

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

PEOPLE OF THE STATE OF ILLINOIS,)	
by KWAME RAOUL, Attorney)	
General of the State of Illinois,)	
)	
Complainant,)	
)	
v.)	PCB No.
)	(Enforcement – Water)
VILLAGE OF OLYMPIA FIELDS,)	
a municipal corporation,)	
)	
Respondent.)	

NOTICE OF FILING

PLEASE TAKE NOTICE that I have today caused to be filed with the Clerk of the Illinois Pollution Control Board by electronic filing the following Complaint, Motion for Relief from Hearing Requirement, and Stipulation and Proposal for Settlement, true and correct copies of which are attached hereto and hereby served upon you.

PEOPLE OF THE STATE OF ILLINOIS,
KWAME RAOUL, Attorney General
of the State of Illinois

By: /s/ Rebecca Kanz
Rebecca Kanz
Assistant Attorney General
Environmental Bureau
Illinois Attorney General's Office
69 W. Washington Street, Suite 1800
Chicago, Illinois 60602
(773) 590-7968
Primary: Rebecca.Kanz@ilag.gov
Secondary: Maria.Cacaccio@ilag.gov

Date: February 14, 2025

SERVICE LIST

Village of Olympia Fields

John Murphey
Odelson, Murphey, Frazier & McGrath, Ltd.
3318 W. 95th Street
Evergreen Park, IL 60805
jmurphey@omfmlaw.com

CERTIFICATE OF SERVICE

I, Rebecca Kanz, an Assistant Attorney General, do certify that on this 14th day of February 2025, I caused to be served a copy of the foregoing Notice of Filing, Complaint, Motion for Relief from Hearing Requirement, and Stipulation and Proposal for Settlement, upon the persons listed on the Service List via certified mail and email.

/s/ Rebecca Kanz

Rebecca Kanz
Assistant Attorney General
Environmental Bureau
Illinois Attorney General's Office
69 W. Washington Street, Suite 1800
Chicago, Illinois 60602
(773) 590-7968
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COMPLAINT

Complainant, PEOPLE OF THE STATE OF ILLINOIS, by KWAME RAOUL, Attorney General of the State of Illinois, complains of Respondent, VILLAGE OF OLYMPIA FIELDS, a municipal corporation (“Olympia Fields”), as follows:

COUNT I

FAILURE TO SUBMIT LEAD AND COPPER SAMPLE RESULTS

1. This count is brought on behalf of the PEOPLE OF THE STATE OF ILLINOIS by KWAME RAOUL, Attorney General of the State of Illinois, on his own motion and at the request of the Illinois EPA, against Olympia Fields, pursuant Section 31 of the Illinois Environmental Protection Act (“Act”), 415 ILCS 5/31 (2022).

2. The Illinois EPA is an administrative agency of the State of Illinois created by the Illinois General Assembly in Section 4 of the Act, 415 ILCS 5/4 (2022), and charged, *inter alia*, with the duty of enforcing the Act.

3. Olympia Fields was and is a municipal corporation duly organized and existing under the laws of the State of Illinois, located in Cook County, Illinois.

4. Olympia Fields owns and operates a public water supply (“PWS”) that has 1,853 service connections, and serves approximately 4,988 residents.

5. Olympia Fields’ operation of its water supply system is subject to the Act and the Rules and Regulations promulgated by the Illinois Pollution Control Board (“Board”). The Board’s regulations for public water supplies are found in Title 35, Subtitle F, Chapter I of the Illinois Administrative Code (“Board Public Water Supply Regulations”).

6. The Illinois EPA requires PWSs to sample their drinking water for the presence of microorganisms, chemicals, and other contaminants, and to maintain compliance with monitoring and reporting standards that are set by the Board regulations. Among others, PSWs are required to sample for lead and copper.

7. Section 18(a)(2) of the Act, 415 ILCS 5/18(a)(2) (2022), provides, in pertinent part, as follows:

(a) No person shall:

* * *

(2) Violate regulations or standards adopted by the Agency pursuant to Section 15(b) or this Act or by the Board under this Act; . . .

8. Sections 3.145, 3.315, and 3.365 of the Act, 415 ILCS 5/3.145, 5/3.315, and 5/3.365 (2022), respectively, provide the following definitions:

“COMMUNITY WATER SUPPLY” means a public water supply which serves or is intended to serve at least 15 service connections used by residents or regularly serves at least 25 residents.

“PERSON” is any individual, partnership, co-partnership, firm, company, limited liability company, corporation, association, joint stock company, trust, estate, political subdivision, state agency, or any other legal entity, or their legal representative, agent or assigns.

“PUBLIC WATER SUPPLY” means all mains, pipes and structures through which water is obtained and distributed to the public, including wells and well structures, intakes and cribs, pumping stations, treatment plants, reservoirs, storage tanks and appurtenances, collectively or severally, actually used or intended for use for the purpose of furnishing water for drinking or general domestic use and which serve at least 15 service connections or which regularly serve at least 25 persons at least 60 days per year. A public water supply is either a “community water supply” or a “non-community water supply”.

9. Olympia Fields, a municipal corporation, is a “person,” as that term is defined in Section 3.315 of the Act, 415 ILCS 5/3.315 (2022).

10. Olympia Fields’ water supply system, which serves approximately 4,988 residents, is a “public water supply” that is a “community water supply,” as those terms are defined in Sections 3.145 and 3.365 of the Act, 415 ILCS 5/3.145 and 5/3.365 (2022).

11. Section 611.1350(a)¹ of the Board Public Water Supplies Regulations, 35 Ill. Adm. Code 611.1350(a) provides, in pertinent part, as follows:

a) Applicability and Scope

1) Applicability and Complying with this Subpart AG. Subpart G and this Subpart AG constitute [National Primary Drinking Water Regulations] for lead and copper. Subpart G and this Subpart AG apply to all community water systems (CWSs) and non-transient, non-community water systems (NTNCWSs).

A) A supplier must comply with this Subpart AG until the earlier of when the supplier complies with Subpart AG or October 16, 2024.

12. Section 611.1350(h) of the Board Public Water Supplies Regulations, 35 Ill. Adm. Code 611.1350(h), provides the following:

¹ On November 2, 2023, the Illinois Pollution Control Board amended the Lead and Copper Rule (“LCR”) contained in Section 611, Subpart G, to reflect USEPA’s Lead and Copper Rule Revisions (“LCRR”). However, compliance with the LCRR now contained in Subpart G is not required until October 16, 2024. In the interim, the LCR applies, and has been moved to Section 611, Subpart AG.

- h) Monitoring and Analytical Requirements. Suppliers must complete all tap water monitoring for lead and copper, monitoring for water quality parameters, source water monitoring for lead and copper, and analyses of the monitoring results under this Subpart AG in compliance with Sections 611.1356, 611.1357, 611.1358, and 611.1359.

13. Section 611.101 of the Board Public Water Supplies Regulations, 35 Ill. Adm. Code 611.101, provides the following definition:

“Supplier of water” or “supplier” means any person who owns or operates a public water system (PWS). This term includes the “official custodian.”

14. Olympia Fields, a person that owns and operates a PWS, is a “supplier,” as that term is defined in Section 611.01 of the Board Public Water Supplies Regulations, 35 Ill. Adm. Code 611.101.

15. Section 611.1350(b) of the Board Public Water Supplies Regulations, 35 Ill. Adm. Code 611.1350(b), provides the following definition:

“Medium-sized system” means a water system that regularly serves water to more than 3,300 up to 50,000 or fewer persons.

16. Olympia Fields’ PWS regularly serves water to approximately 4,988 residents and is therefore a “medium-sized system” as that term is defined in Section 611.1350(b) of the Board Public Water Supplies Regulations, 35 Ill. Adm. Code 611.1350(b).

17. Section 611.1356(c) of the Board Public Water Supplies Regulations, 35 Ill. Adm. Code 611.1356(c), sets forth the number of lead and copper samples that must be taken by a supplier and provides the following:

c) Number of Samples

- 1) A supplier must collect at least one sample each from the number of sites in the first column of Table D (labelled “standard monitoring”) during each six-month monitoring period subsection (d) specifies.

- 2) A supplier conducting reduced monitoring under subsection (d)(4) must collect one sample each from the number of sites in the second column of Table D (labelled “reduced monitoring”) during each reduced monitoring period subsection (d)(4) specifies. The reduced monitoring sites must represent the sites standard monitoring requires.

18. Section 611.TABLE D of the Board Public Water Supplies Regulations, 35 Ill.

Adm. Code 611.TABLE D, provides the following:

Section 611.TABLE D Number of Lead and Copper Monitoring Sites

System Size (Persons Served)	Number of Sites (Standard Monitoring)	Number of Sites (Reduced Monitoring)
More than 100,000	100	50
10,001-100,000	60	30
3,301 to 10,000	40	20
501 to 3,300	20	10
101 to 500	10	5
100 or fewer	5	5

19. As a medium sized system, Olympia Fields was required to collect 40 samples under standard monitoring or 20 samples under reduced monitoring pursuant to Section 611.1356(c) and 611.TABLE D of the Board Public Water Supplies Regulations, 35 Ill. Adm. Code 611.1356(c) and 611.TABLE D.

20. Section 611.1356(d)(4) of the Board Public Water Supplies Regulations, 35 Ill. Adm. Code 611.1356(d)(4), sets forth the provisions for reduced monitoring and provides the following:

- 4) Reduced Monitoring
 - A) Reducing to Annual Monitoring for Small and Medium-Sized System Suppliers Meeting the Lead and Copper Action Levels. A small or medium-sized system supplier meeting the lead and copper action levels during each of two consecutive six-month monitoring periods may reduce the

number of samples under subsection (c) and sampling frequency to once per year....

* * *

- C) Reduction to Triennial for Small- and Medium-Sized Suppliers
 - i) Small- and Medium-Sized System Suppliers Meeting Lead and Copper Action Levels. A small- or medium-sized system supplier that meets the lead action level and that meets the lead and copper action levels during three consecutive years of monitoring may reduce the frequency of monitoring for lead and copper from annually to once every three years.
- D) Sampling at a Reduced Frequency. A supplier reducing the number and frequency of sampling must collect these samples from the pool of targeted sampling sites the supplier selected under subsection (a), preferentially using those sampling sites from the highest tier first. A supplier sampling annually or less frequently must conduct lead and copper tap sampling during June, July, August, or September, unless the Agency approves a different sampling period under subsection (d)(4)(D)(i).

21. By meeting the lead and copper action levels during three consecutive years of monitoring, Olympia Fields was authorized to reduce its frequency of sampling to once every three years during the calendar year immediately following 2001, as provided for in Sections 611.1350(h) and 611.1356(d)(4)(C)(i) of the Board Public Water Regulations, 35 Ill. Adm. Code 611.1350(h) and 611.1356(d)(4)(C)(i).

22. Section 611.1360(a)(1) of the Board Public Water Supplies Regulations, 35 Ill. Adm. Code 611.1360(a)(1), provides, in relevant part, the following:

- a) Reporting for Tap, Lead, and Copper, and Water Quality Parameter Monitoring
 - 1) Except as subsection (a)(1)(H) provides otherwise, a supplier must report certain information for all samples Section 611.1356 specifies . . . within ten days after the end of each applicable sampling period Section[] 611.1356 . . . specify....

* * *

23. For the triennial monitoring period from 2017 to 2020, Olympia Fields, as a medium-sized system supplier on reduced triennial monitoring, was required to submit to Illinois EPA twenty sample results for lead and copper within ten days of end of the June 1, 2020 to September 30, 2020 sampling period.

24. Olympia Fields submitted to Illinois EPA nineteen of the twenty required sample results for lead and copper for the June 1, 2020 to September 30, 2020 sampling period.

25. On July 28, 2021, Illinois EPA notified Olympia Fields that because it did not submit all twenty results for lead and copper for the June 1, 2020 to September 30, 2020 sampling period, it was required to conduct lead and copper compliance sampling on an annual basis instead of a triennial basis, thus requiring the collection of twenty lead and copper distribution samples during the June 1, 2021 through September 30, 2021 sampling period.

26. As of the date of the filing of this Complaint, Olympia Fields has failed to submit to Illinois EPA sample results for lead and copper for the June 1, 2021 to September 30, 2021 sampling period.

27. By failing to submit to Illinois EPA sample results for lead and copper for the June 1, 2021 to September 30, 2021 sampling period, Olympia Fields violated Section 611.1356(d)(4) of the Board Public Water Supplies Regulations, 35 Ill. Adm. Code 611.1356(d)(4), and thereby also violated Section 18(a)(2) of the Act, 415 ILCS 5/18(a)(2) (2022).

WHEREFORE, Complainant, PEOPLE OF THE STATE OF ILLINOIS, respectfully requests that that the Board enter an Order against Respondent, VILLAGE OF OLYMPIA FIELDS, with respect to Count I:

1. Authorizing a hearing in this matter at which time Olympia Fields will be required to answer the allegations herein;
2. Finding that Olympia Fields violated Section 18(a)(2) of the Act, 415 ILCS 5/18(a)(2) (2022), and Section 611.1356(d)(4) of the Board Public Water Supplies Regulations, 35 Ill. Adm. Code 611.1356(d)(4);
3. Ordering Olympia Fields to cease and desist from any future violations of Section 18(a)(2) of the Act, 415 ILCS 5/18(a)(2) (2022), and Section 611.1356(d)(4) of the Board Public Water Supplies Regulations, 35 Ill. Adm. Code 611.1356(d)(4);
4. Assessing against Olympia Fields a civil penalty of Fifty Thousand Dollars (\$50,000.00) for each violation of the Act and pertinent regulations, and an additional civil penalty of Ten Thousand Dollars (\$10,000.00) for each day the violations continued;
5. Taxing all costs in this action, including, but not limited to, attorney, expert witness and consultant fees, against Olympia Fields; and
6. Granting such other relief as the Board deems appropriate and just.

PEOPLE OF THE STATE OF ILLINOIS,
by KWAME RAOUL,
Attorney General of the State of Illinois

MATTHEW J. DUNN, Chief
Environmental Enforcement/
Asbestos Litigation Division

By: /s/ Stephen J. Sylvester
STEPHEN J. SYLVESTER, Chief
Environmental Bureau
Assistant Attorney General

Of Counsel:
Rebecca Kanz
Assistant Attorney General
Environmental Bureau
Illinois Attorney General's Office
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312.814.3532
Primary: Rebecca.kanz@ilag.gov
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v.)	PCB No.
)	(Enforcement – Water)
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a municipal corporation,)	
)	
Respondent.)	

MOTION FOR RELIEF FROM HEARING REQUIREMENT

NOW COMES Complainant, PEOPLE OF THE STATE OF ILLINOIS, by KWAME RAOUL, Attorney General of the State of Illinois, and pursuant to Section 31(c)(2) of the Illinois Environmental Protection Act (“Act”), 415 ILCS 5/31(c)(2) (2022), moves that the Illinois Pollution Control Board (“Board”) grant the parties in the above-captioned matter relief from the hearing requirement imposed by Section 31(c)(1) of the Act, 415 ILCS 5/31(c)(1) (2022). In support of this motion, Complainant states as follows:

1. The Complainant in this matter alleges violations of Section 18(a)(2) of the Act, 415 ILCS 5/18(a)(2) (2022), and Section 611.1356(d)(4) of the Board Public Water Supplies Regulations, 35 Ill. Adm. Code 611.1356(d)(4).
2. The parties have reached agreement on all outstanding issues in this matter.
3. This agreement is presented to the Board in a Stipulation and Proposal for Settlement filed this same date.

4. All parties agree that a hearing on the Stipulation and Proposal for Settlement is not necessary, and respectfully request relief from such a hearing as allowed by Section 31(c)(2) of the Act, 415 ILCS 5/31(c)(2) (2022).

WHEREFORE, Complainant, PEOPLE OF THE STATE OF ILLINOIS, hereby requests that the Board grant this motion for relief from the hearing requirement set forth in Section 31(c)(1) of the Act, 415 ILCS 5/31(c)(1) (2022).

Respectfully submitted,

PEOPLE OF THE STATE OF ILLINOIS
KWAME RAOUL,
Attorney General of the State of Illinois

BY: /s/ Rebecca Kanz
Rebecca Kanz
Assistant Attorney General
Environmental Bureau
Illinois Attorney General's Office
69 W. Washington Street, Suite 1800
Chicago, Illinois 60602
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DATE: February 14, 2025

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STIPULATION AND PROPOSAL FOR SETTLEMENT

Complainant, PEOPLE OF THE STATE OF ILLINOIS, by KWAME RAOUL, Attorney General of the State of Illinois, the ILLINOIS ENVIRONMENTAL PROTECTION AGENCY (“Illinois EPA”), and Respondent, VILLAGE OF OLYMPIA FIELDS (“Olympia Fields”), a municipal corporation, (collectively “Parties to the Stipulation”), have agreed to the making of this Stipulation and Proposal for Settlement (“Stipulation”) and submit it to the Illinois Pollution Control Board (“Board”) for approval. This stipulation of facts is made and agreed upon for purposes of settlement only and as a factual basis for the Board’s approval of this Stipulation and issuance of relief. None of the facts stipulated herein shall be introduced into evidence in any other proceeding regarding the violations of the Illinois Environmental Protection Act (“Act”), 415 ILCS 5/1, et seq. (2022), and the Board’s regulations, alleged in the Complaint except as otherwise provided herein. It is the intent of the Parties to the Stipulation that it be a final adjudication of this matter.

I. STATEMENT OF FACTS

A. Parties

1. On February 14, 2025, a Complaint was filed on behalf of the People of the State of Illinois by Kwame Raoul, Attorney General of the State of Illinois, on his own motion and upon the request of the Illinois EPA, pursuant to Section 31 of the Illinois Environmental Protection Act (“Act”), 415 ILCS 5/31 (2022), against Olympia Fields (“Complaint”).

2. The Illinois EPA is an administrative agency of the State of Illinois, created pursuant to Section 4 of the Act, 415 ILCS 5/4 (2022).

3. At all times relevant to the Complaint, Olympia Fields was and is a municipal corporation duly organized and existing under the laws of the State of Illinois, located in Cook County, Illinois.

4. At all times relevant to the Complaint, Olympia Fields owns and operates a public water supply (“PWS”) that has 1,853 service connections, and serves approximately 4,988 residents.

B. Allegations of Non-Compliance

Complainant contends that Olympia Fields has violated the following provisions of the Act and Board regulations:

Count 1: Failure to Submit Lead and Copper Results in violation of Section 18(a)(2) of the Act, 415 ILCS 5/18(a)(2) (2022), and Section 611.1356(d)(4) of the Board Public Water Supplies Regulations, 35 Ill. Adm. Code 611.1356(d)(4).

C. Admission of Violations

Olympia Fields admits to the violations alleged in the Complaint filed in this matter and referenced within Section I.B herein.

II. APPLICABILITY

This Stipulation shall apply to and be binding upon the Parties to the Stipulation. Olympia Fields shall not raise as a defense to any enforcement action taken pursuant to this Stipulation the failure of any of its officers, directors, agents, employees or successors or assigns to take such action as shall be required to comply with the provisions of this Stipulation. This Stipulation may be used against Olympia Fields in any subsequent enforcement action or permit proceeding as proof of a past adjudication of violation of the Act and the Board regulations for all violations alleged in the Complaint in this matter, for purposes of Sections 39 and 42 of the Act, 415 ILCS 5/39 and 42 (2022).

III. IMPACT ON THE PUBLIC RESULTING FROM ALLEGED NON-COMPLIANCE

Section 33(c) of the Act, 415 ILCS 5/33(c) (2022), provides as follows:

In making its orders and determinations, the Board shall take into consideration all the facts and circumstances bearing upon the reasonableness of the emissions, discharges, or deposits involved including, but not limited to:

1. the character and degree of injury to, or interference with the protection of the health, general welfare and physical property of the people;
2. the social and economic value of the pollution source;
3. the suitability or unsuitability of the pollution source to the area in which it is located, including the question of priority of location in the area involved;
4. the technical practicability and economic reasonableness of reducing or eliminating the emissions, discharges or deposits resulting from such pollution source; and
5. any subsequent compliance.

In response to these factors, the Parties to the Stipulation state the following:

1. Human health and the environment were threatened and the Illinois EPA's information gathering responsibilities hindered by Olympia Fields' violations.

2. There is social and economic benefit to the PWS.
3. Operation of the PWS was and is suitable for the area in which it is located.
4. Submission of required lead and copper sample results from Olympia Fields' PWS to Illinois EPA is both technically practicable and economically reasonable.
5. Olympia Fields did not take the lead and copper samples for the June 1, 2021 to September 30, 2021 sampling period and as such cannot remedy this violation. However, since that sampling period, Olympia Fields has subsequently complied with the Act and the Board regulations, including the requirement to sample its PWS for lead and copper and submit the results to Illinois EPA.

IV. CONSIDERATION OF SECTION 42(h) FACTORS

Section 42(h) of the Act, 415 ILCS 5/42(h) (2022), provides as follows:

In determining the appropriate civil penalty to be imposed under . . . this Section, the Board is authorized to consider any matters of record in mitigation or aggravation of penalty, including but not limited to the following factors:

1. the duration and gravity of the violation;
2. the presence or absence of due diligence on the part of the respondent in attempting to comply with requirements of this Act and regulations thereunder or to secure relief therefrom as provided by this Act;
3. any economic benefits accrued by the respondent because of delay in compliance with requirements, in which case the economic benefits shall be determined by the lowest cost alternative for achieving compliance;
4. the amount of monetary penalty which will serve to deter further violations by the respondent and to otherwise aid in enhancing voluntary compliance with this Act by the respondent and other persons similarly subject to the Act;
5. the number, proximity in time, and gravity of previously adjudicated violations of this Act by the respondent;

6. whether the respondent voluntarily self-disclosed, in accordance with subsection i of this Section, the non-compliance to the Agency;
7. whether the respondent has agreed to undertake a supplemental environmental project, which means an environmentally beneficial project that a respondent agrees to undertake in settlement of an enforcement action brought under this Act, but which the respondent is not otherwise legally required to perform; and
8. whether the respondent has successfully completed a Compliance Commitment Agreement under subsection (a) of Section 31 of this Act to remedy the violations that are the subject of the complaint.

In response to these factors, the Parties to the Stipulation state as follows:

1. Olympia Fields did not take and therefore failed to submit lead and copper samples to Illinois EPA for the June 1, 2021 to September 30, 2021 sampling period. The alleged violations began on October 10, 2021, but since Olympia Fields did not take the lead and copper samples for the June 1, 2021 to September 30, 2021 sampling period, Olympia Fields cannot remedy the violation. However, Olympia Fields submitted lead and copper samples for the next monitoring period, from January 1, 2022 through June 30, 2022, and Olympia Fields has subsequently complied with the Act and the Board regulations, including the requirement to sample its PWS for lead and copper and submit the results to Illinois EPA.

2. Olympia Fields did not take the lead and copper samples for the June 1, 2021 to September 30, 2021 sampling period and as such cannot remedy this violation. However, since that sampling period, Olympia Fields has been diligent in attempting to come back into compliance with the Act and Board regulations, including the requirement to sample its PWS for lead and copper and submit the results to Illinois EPA.

3. The civil penalty takes into account any economic benefit realized by Olympia Fields as a result of avoided or delayed compliance.

4. Complainant has determined, based upon the specific facts of this matter, that a

penalty of \$3,456.00 will serve to deter further violations and aid in future voluntary compliance with the Act and Board regulations.

5. On December 10, 2008, Olympia Fields entered into a Consent Order in Circuit Court with Complainant regarding violations of its National Pollutant Discharge Elimination System ("NPDES") Permit. Olympia Fields paid a civil penalty of \$12,026 and performed a supplemental environmental project valued at \$35,000 to offset \$5,000 of the civil penalties.

6. Self-disclosure is not at issue in this matter.

7. The settlement of this matter does not include a supplemental environmental project.

8. A Compliance Commitment Agreement was not at issue in this matter.

V. TERMS OF SETTLEMENT

A. Penalty Payment

1. Olympia Fields shall pay a civil penalty in the sum of \$3,456.00 within thirty (30) days from the date the Board adopts and accepts this Stipulation.

B. Stipulated Penalties, Interest, and Default

1. If Olympia Fields fails to make any payment required by this Stipulation on or before the date upon which the payment is due, Olympia Fields shall be in default and the remaining unpaid balance of the penalty, plus any accrued interest, shall be due and owing immediately. In the event of default, the Complainant shall be entitled to reasonable costs of collection, including reasonable attorney's fees.

2. Pursuant to Section 42(g) of the Act, interest shall accrue on any penalty amount owed by Olympia Fields not paid within the time prescribed herein. Interest on unpaid penalties shall begin to accrue from the date such are due and continue to accrue to the date full payment is

received. Where partial payment is made on any penalty amount that is due, such partial payment shall be first applied to any interest on unpaid penalties then owing.

C. Payment Procedures

1. All payments required by this Stipulation shall be made by certified check or money order payable to the Illinois EPA for deposit into the Environmental Protection Trust Fund ("EPTF"). Payments shall be sent by first class mail and delivered to:

Illinois Environmental Protection Agency
Fiscal Services
2520 W. Iles Avenue
P.O. Box 19276
Springfield, Illinois 62794-9276

2. The case name and case number shall appear on the face of the certified check or money order.

3. A copy of the certified check or money order and any transmittal letter shall be sent to:

Rebecca Kanz
Assistant Attorney General
Environmental Bureau
Illinois Attorney General's Office
69 W. Washington Street, Suite 1800
Chicago, Illinois 60602

D. Future Compliance

1. In addition to any other authorities, the Illinois EPA, its employees and representatives, the Attorney General, his employees and representatives, shall have the right of entry into and upon Olympia Fields's PWS which is the subject of this Stipulation, at all reasonable times for the purposes of conducting inspections and evaluating compliance status. In conducting such inspections, the Illinois EPA, its employees and representatives, the Attorney General, his employees and representatives, may take photographs, samples, and collect information, as they

deem necessary.

2. This Stipulation in no way affects the responsibilities of Olympia Fields to comply with any other federal, state or local laws or regulations, including but not limited to the Act and the Board regulations.

3. Olympia Fields shall cease and desist from future violations of the Act and Board regulations that were the subject matter of the Complaint.

E. Release from Liability

In consideration of Olympia Fields' payment of a \$3,456.00 penalty, its commitment to cease and desist as contained in Section III.D.3. above, completion of all activities required hereunder, and upon the Board's approval of this Stipulation, the Complainant releases, waives and discharges Olympia Fields from any further liability or penalties for the violations of the Act and Board regulations that were the subject matter of the Complaint herein. The release set forth above does not extend to any matters other than those expressly specified in Complainant's Complaint filed on February 14, 2025. The Complainant reserves, and this Stipulation is without prejudice to, all rights of the State of Illinois against Olympia Fields with respect to all other matters, including but not limited to the following:

- a. criminal liability;
- b. liability for future violation of state, federal, local, and common laws and/or regulations;
- c. liability for natural resources damage arising out of the alleged violations; and
- d. Olympia Fields' failure to satisfy the requirements of this Stipulation.

Nothing in this Stipulation is intended as a waiver, discharge, release, or covenant not to sue for any claim or cause of action, administrative or judicial, civil or criminal, past or future, in law or

in equity, which the State of Illinois may have against any person, as defined by Section 3.315 of the Act, 415 ILCS 5/3.315, or entity other than Olympia Fields.

F. Enforcement of Stipulation

Upon the entry of the Board's Order approving and accepting this Stipulation, that Order is a binding and enforceable order of the Board and may be enforced as such through any and all available means.


G. Execution and Entry of the Stipulation

The undersigned representatives for the Parties to the Stipulation certify that they are fully authorized by the party whom they represent to enter into the terms and conditions of this Stipulation and to legally bind them to it. This Stipulation may be executed by the parties in one or more counterparts, all of which taken together shall constitute one and the same instrument.

WHEREFORE, the Parties to the Stipulation request that the Board adopt and accept the foregoing Stipulation and Proposal for Settlement as written.

PEOPLE OF THE STATE OF ILLINOIS
KWAME RAOUL, Attorney General
State of Illinois

MATTHEW J. DUNN, Chief
Environmental Enforcement/
Asbestos Litigation Division

BY: 
STEPHEN J. SYLVESTER, Chief
Environmental Bureau
Assistant Attorney General

DATE: 2/6/25

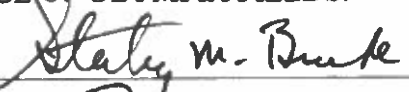
ILLINOIS ENVIRONMENTAL
PROTECTION AGENCY

JAMES JENNINGS, Acting Director
Illinois Environmental Protection Agency

BY: 
ANDREW ARMSTRONG
Chief Legal Counsel

DATE: 02/06/2025

VILLAGE OF OLYMPIA FIELDS.

BY: 
Its: President

DATE: 1/16/25