

**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. 25-048
	)	
	)	
MARSHALL FIELD'S CHICAGO, INC.	)	
d/b/a MACY'S BRUNSWICK	)	
SQUARE, a Delaware corporation,	)	
	)	
Respondent.	)	

**NOTICE OF FILING**

To: Persons on Attached Service List  
(VIA ELECTRONIC FILING)

PLEASE TAKE NOTICE that I have today filed with the Office of the Clerk of the Illinois Pollution Control Board by electronic filing Agreed Motion to Substitute Party Respondent for Misnomer, a true and correct copy of which is attached hereto and hereby served upon you.

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

By: /s/ Taylor Desgrosseilliers  
Taylor Desgrosseilliers  
Assistant Attorney General  
Environmental Bureau  
Office of the Illinois Attorney General  
69 W. Washington Street, 18<sup>th</sup> Floor  
Chicago, IL 60602  
(773) 505-5288  
[T.Desgrosseilliers@ilag.gov](mailto:T.Desgrosseilliers@ilag.gov)

Date: April 24, 2025

**SERVICE LIST**

Bradley P. Halloran  
Hearing Officer  
Illinois Pollution Control Board  
60 E. Van Buren Street, Suite 630  
Chicago, IL 60605  
[Brad.Halloran@illinois.gov](mailto:Brad.Halloran@illinois.gov)  
(Via Email)

Corporate Creations Network, Inc.  
Marshall Field's Chicago, Inc.  
1320 Tower Rd.  
Schaumburg, IL 60173  
(Via U.S. Mail)

**CERTIFICATE OF SERVICE**

I, Taylor Desgrosseilliers, an Assistant Attorney General, certify that on the 24th day of April 2025, I caused to be served the foregoing Notice of Filing and Agreed Motion to Substitute Party Respondent for Misnomer on the parties named on the attached Service List via methods described.

/s/ Taylor Desgrosseilliers

Taylor Desgrosseilliers  
Assistant Attorney General  
Environmental Bureau  
69 W. Washington Street, 18<sup>th</sup> Floor  
Chicago, Illinois 60602  
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d/b/a MACY'S BRUNSWICK	)	
SQUARE, a Delaware corporation,	)	
	)	
Respondent.	)	

**AGREED MOTION TO SUBSTITUTE PARTY RESPONDENT FOR MISNOMER**

Complainant, PEOPLE OF THE STATE OF ILLINOIS, by KWAME RAOUL, Attorney General of the State of Illinois, and Respondent, MARSHALL FIELD'S CHICAGO, INC. d/b/a MACY'S BRUNSWICK SQUARE ("Marshall Field's") (collectively the "Parties"), respectfully request that the name in the above-captioned matter be amended to correct the inadvertent misnomer of Respondent, pursuant to Section 103.202(c) of the Illinois Pollution Control Board Regulations ("PCB Regulations"), 35 Ill. Adm. Code 103.202(c). In support thereof, the Parties state as follows:

1. On February 21, 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 Environmental Protection Agency pursuant to pursuant to Section 31 of the Illinois Environmental Protection Act ("Act"), 415 ILCS 5/31 (2022), against Respondent Marshall Field's.

2. On February 27, 2025, Complainant received a United States Postal Service Certified Mail Signature Confirmation, signed by Marshall Field's Registered Agent.

3. On March 18, 2025, Counsel for Marshall Field's informed Plaintiffs that Marshall Field's no longer conducts any business and that Macy's Retail Holdings, LLC is the primary entity responsible for daily operations of the boiler plant located at 111 North State Street, Chicago, Cook County Illinois ("Facility").

4. Section 103.202(c) of the PCB Regulations, 35 Ill. Adm. Code 103.202(c), addresses situations involving misnomer of a party. *See* 35 Ill. Adm. Code 103.202(c) ("Misnomer of a party is not a ground for dismissal; the name of any party may be corrected at any time.").

WHEREFORE, Parties respectfully request that, for the purposes of this case, all subsequent filings that the Parties make be amended to correct the misnomer and that Respondent, Marshall Field's Chicago, Inc. d/b/a Macy's Brunswick Square, be hereafter referred to as MACY'S RETAIL HOLDINGS, LLC.

Respectfully submitted,

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

MACY'S RETAIL HOLDINGS, LLC

By: /s/ Taylor Desgrosseilliers  
Taylor Desgrosseilliers  
Assistant Attorney General  
Environmental Bureau  
Office of the Illinois Attorney General  
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[T.Desgrosseilliers@ilag.gov](mailto:T.Desgrosseilliers@ilag.gov)

By: /s/ Christine Brandt  
Christine Brandt  
Senior Principal, Senior Counsel  
Macy's, Inc.  
(415) 515-1373  
[Christine.Brandt@macys.com](mailto:Christine.Brandt@macys.com)