

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

RECEIVED  
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OCT 09 2007

STATE OF ILLINOIS  
Pollution Control Board

FLAGG CREEK WATER RECLAMATION  
DISTRICT,

Complainant

v.

VILLAGE OF HINSDALE, METROPOLITAN  
WATER RECLAMATION DISTRICT OF  
GREATER CHICAGO, ILLINOIS  
DEPARTMENT OF TRANSPORTATION,  
DUPAGE COUNTY,

Respondents.

ORIGINAL

PCB 06-141

Administrative Hearing  
Officer  
Bradley Halloran

**SUBPOENA DUCES TECUM**

TO: **RJN Group, Inc.**  
**200 W. Front Street**  
**Wheaton, IL 60187**

Pursuant to Section 5(e) of the Environmental Protection Act (415 ILCS 5/5(e)  
(2002)) and 35 Ill. Adm. Code 101, Subpart F, you are ordered to attend and give  
testimony at the hearing/deposition in the above-captioned matter at 10:00 a.m. on  
October 31, 2007 at the law offices of Drinker Biddle Gardner Carton, LLP located at 191  
North Wacker Drive, Suite 3700 Chicago, Illinois 60606.

You are also ordered to bring with you documents relevant to the matter under  
consideration and designated herein, related to the work that RJN Group, Inc. performed  
in connection with Village of Hinsdale's (VOH) combined sewer overflow system.

Please include any correspondence to and from RJN and VOH including but not limited to documents, reports, studies, and invoices with payments rendered for services performed.

Failure to comply with this subpoena will subject you to sanctions under 35 Ill. Adm. Code 101.622(g) and 101.802.


ENTER:



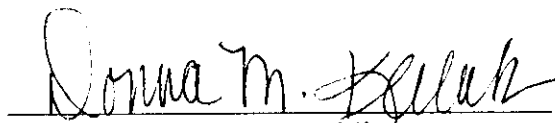
John T. Therriault, Assistant Clerk  
Pollution Control Board

Date: October 9, 2007

I served this subpoena duces tecum by certified mail to RJN Group, Inc. on  
October 9, 2007

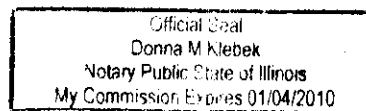


Subscribed and sworn to before me this 9<sup>th</sup> day of October, 2007.



Notary Public

CH01/ 12521031.1



**CERTIFICATE OF SERVICE**

I, Yesenia Villasenor-Rodriguez, an attorney in the law firm of Drinker Biddle Gardner Carton LLP, certify that a copy of the foregoing Subpoena Duces Tecum – RJN Group, Inc. was delivered upon:

ORIGINAL

John Therriault  
Assistant Clerk  
Illinois Pollution Control Board  
James R. Thompson Center  
100 West Randolph Street  
Suite 11-500  
Chicago, IL 60601

**RECEIVED**  
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OCT 09 2007  
STATE OF ILLINOIS  
Pollution Control Board

Bradley P. Halloran  
Hearing Officer  
Illinois Pollution Control Board  
James R. Thompson Center  
100 West Randolph Street  
Suite 11-500  
Chicago, IL 60601

by hand delivery on this 9<sup>th</sup> day of October, 2007.

Y. Villasenor-Rodriguez  
Yesenia Villasenor-Rodriguez

October 9, 2007

191 North Wacker Drive  
Suite 3700  
Chicago, IL  
60606-1698  
  
(312) 569-1000 phone  
(312) 569-1000 fax  
www.drinkerbiddle.com

**Via Certified Mail**

Alan J. Hollenbeck, P.E. Principal  
RJN Group, Inc.  
200 West Front Road  
Wheaton, IL 60187

**Re: *Subpoena Request in Regards to Flagg Creek Water Reclamation  
District v. Village of Hinsdale et. seq. PCB 06-141***

Dear Mr. Hollenbeck:

We represent the Flagg Creek Water Reclamation District in the above matter against the Village of Hinsdale (VOH) that is currently before the Illinois Pollution Control Board (Board). We are writing this letter in connection with the subpoena that we have served upon your organization with this letter. Specifically, we are requesting the deposition of the person most knowledgeable about the work that RJN Group, Inc. (RJN) performed for VOH in connection with the Village of Hinsdale's combined sewer overflows; along with copies of documents, reports, correspondence to and from Village of Hinsdale and RJN, and other relevant documents related to same.

The subpoena requires your presence at our offices located at 191 North Wacker Drive, Suite 3700 in Chicago, Illinois 60606 on October 31, 2007 at 10:00 a.m. Please be advised that there is no legal action being taken against you in this matter. We simply are requesting the deposition of said person, along with the documents in your possession related to this matter as provided herein. We have included a letter that was written by you to the Illinois Environmental Protection Agency dated January 25, 2005 as a reference to facilitate your production of the documents requested. Alternatively, if you produce these documents by October 31, 2007, we will excuse your attendance until such time as may be necessary if at all.

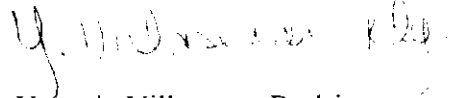
Under Section 35 Ill. Adm. Code Section 101.622(e) of the Board Regulations, because you are not a party to this action you are entitled to receive witness fee compensation for your attendance at the deposition as provided in section 4.3 of the Circuit Court Act 705 ILCS 35/4.3. We have included a check in the amount of \$100.00. If you produce the documents by the required subpoena date or other date as agreed by us, you may apply this check towards the reproduction costs of the documents we are requesting.

October 9, 2007

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If you have any questions, please feel free to contact me at (312) 569-1444.  
Thank you for your time.

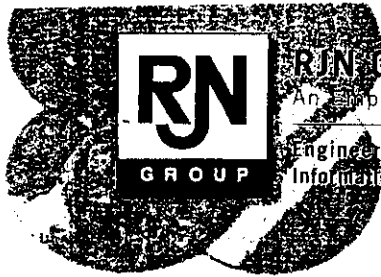
Very truly yours,



Yesenia Villasenor-Rodriguez

cc: Illinois Pollution Control Board, Clerk (w/enclosure) ✓  
Bradley P. Halloran, Hearing Officer (w/enclosure)

CI101/ 12521004.1



**RJN GROUP, INC.**

An Employee-Owned Firm

Engineering Consulting and  
Information Technology Services

200 West Front Street

Wheaton, IL 60187

630.682.4700

fax 630.682.4754

[www.rjn.com](http://www.rjn.com)

January 25, 2005

Ms. Melissa A. Parrott  
Office Administrator  
Permits Section  
Division of Water Pollution Control  
Illinois Environmental Protection Agency  
1021 North Grand Avenue East  
Springfield, Illinois 62794-9276

Subject: NPDES Permit No. IL 0066818  
Village of Hinsdale Combined Sewer Overflows

Dear Ms. Parrott:

The Village of Hinsdale has retained RJN Group, Inc. to provide assistance in applying for re-issuance of NPDES Permit Number IL006618. Attached are one original and two copies of the required permit application along with supporting documentation. Please contact the undersigned directly if you have any questions regarding the enclosed permit application.

Very truly yours;

RJN GROUP, INC.

Alan J. Hollenbeck, P.E.  
Principal

CC: Dan Schoenberg – Village of Hinsdale