

**IN THE CIRCUIT COURT OF THE TWENTY-FIRST JUDICIAL CIRCUIT
KANKAKEE COUNTY, ILLINOIS
CHANCERY DIVISION**

PEOPLE OF THE STATE OF ILLINOIS,)	
<i>ex rel.</i> KWAME RAOUL, Attorney)	
General of the State of Illinois,)	
)	
Plaintiff,)	
)	
v.)	No. 24 CH 11
)	
STONETOWN MANTENO, LLC,)	
a Colorado limited liability company,)	
d/b/a MANTENO MOBILE HOME)	
PARK, and HH MANTENO MHP, LLC,)	
a Delaware limited liability company,)	
)	
Defendants.)	

CONSENT ORDER WITH HH MANTENO MHP, LLC ONLY

Plaintiff, PEOPLE OF THE STATE OF ILLINOIS, *ex rel.* KWAME RAOUL, Attorney General of the State of Illinois, the ILLINOIS ENVIRONMENTAL PROTECTION AGENCY (“Illinois EPA”), and Defendant, HH MANTENO MPH, LLC, a Delaware limited liability company, (“HH Manteno”), (collectively “Parties to the Consent Order”), have agreed to the making of this Consent Order and submit it to this Court for approval.

I. INTRODUCTION

This stipulation of facts is made and agreed upon for purposes of settlement only and as a factual basis for the Court’s entry of the Consent Order and issuance of any injunctive 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 Illinois Pollution Control Board (“Board”) regulations, alleged in the

Complaint except as otherwise provided herein. It is the intent of the Parties to this Consent Order that it be a final judgment on the merits of this matter.

A. Parties

1. On February 28, 2024, 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 Sections 42(d) and (e) of the Act, 415 ILCS 5/42(d) and (e) (2022), against HH Manteno.

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, Defendant HH Manteno was and is a Delaware limited liability company.

4. From September 28, 2021 to the date of filing of this Complaint, HH Manteno owned and operated a sewage treatment plant (“STP”) at its mobile home park (“the Park”) located at 9000 E. Witaker Road, Manteno, Kankakee County, Illinois (PIN 02-03-16-300-002) (“Site”).

B. Allegations of Non-Compliance

Plaintiff contends that the HH Manteno has violated the following provisions of the Act and Illinois Pollution Control Board regulations:

- Count I: Violation of National Pollutant Discharge Elimination System (“NPDES”) permit effluent limitations in violation of Section 12(f) of the Act, 415 ILCS 5/12(f) (2022), Sections 304.141(a) and 309.102(a) of the Board Water Pollution Regulations, 35 Ill. Adm. Code 304.141(a) and 309.102(a), and the terms and conditions of its National Pollutant Discharge Elimination System (“NPDES Permit”); and
- Count II: Causing, threatening, or allowing water pollution in violation of Section 12(a) of the Act, 415 ILCS 5/12(a) (2022).

C. Non-Admission of Violations

HH Manteno represents that it has entered into this Consent Order for the purpose of settling and compromising disputed claims without having to incur the expense of contested litigation. By entering into this Consent Order and complying with its terms, HH Manteno does not affirmatively admit the allegations of violation within the Complaint and referenced above, and this Consent Order shall not be interpreted as including such admission.

D. Compliance Activities to Date

1. In December 2022, HH Manteno hired an engineering consultant, who conducted a full assessment of the Park's STP and provided technical recommendations.

2. In April 2022, HH Manteno replaced various pumps at the Park's STP.

3. In January 2023, HH Manteno installed a new generator at the Park's STP and inspected all connections to the Park's STP, including those below mobile homes.

4. In March 2023, HH Manteno cleaned and jetted the Park's manholes.

6. In June 2023, HH Manteno jetted the sewer lines at the north end of the Park.

7. In July 2023, HH Manteno's engineer conducted a life span assessment of the Park's STP.

8. In August 2023, HH Manteno created a map of the Park's STP system using a camera, and subsequently jetted the STP's lines.

II. APPLICABILITY

1. This Consent Order shall apply to and be binding upon the Parties to the Consent Order. HH Manteno waives as a defense to any enforcement action taken pursuant to this Consent Order 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 Consent

Order. This Consent Order may be used against HH Manteno 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).

2. HH Manteno shall notify each contractor to be retained to perform work required in this Consent Order of each of the requirements of this Consent Order relevant to the activities to be performed by that contractor, including all relevant work schedules and reporting deadlines, and shall provide a copy of this Consent Order to each contractor already retained no later than thirty (30) calendar days after the date of entry of this Consent Order. In addition, HH Manteno shall provide copies of all schedules for implementation of the provisions of this Consent Order to the prime vendor(s) supplying the control technology systems and other equipment required by this Consent Order.

3. No change in ownership, corporate status or operator of the facility shall in any way alter the responsibilities of HH Manteno under this Consent Order. In the event that HH Manteno proposes to sell or transfer any real property or operations subject to this Consent Order, HH Manteno shall notify the Plaintiff thirty (30) calendar days prior to the conveyance of title, ownership or other interest, including a leasehold interest in the facility or a portion thereof. HH Manteno shall make as a condition of any such sale or transfer, that the purchaser or successor provide HH Manteno site access and all cooperation necessary for HH Manteno to perform to completion any compliance obligation(s) required by this Consent Order. HH Manteno shall provide a copy of this Consent Order to any such successor in interest and HH Manteno shall continue to be bound by and remain liable for performance of all obligations under this Consent Order. In appropriate circumstances, however, HH Manteno and a proposed

purchaser or operator of the facility may jointly request, and the Plaintiff, in its discretion, may consider modification of this Consent Order to obligate the proposed purchaser or operator to carry out future requirements of this Consent Order in place of, or in addition to, HH Manteno. This provision does not relieve HH Manteno from compliance with any regulatory requirement regarding notice and transfer of applicable facility permits.

III. JUDGMENT ORDER

This Court has jurisdiction of the subject matter herein and of the Parties to the Consent Order and, having considered the stipulated facts and being advised in the premises, finds the following relief appropriate:

IT IS HEREBY ORDERED, ADJUDGED AND DECREED:

A. Civil Penalty

1. HH Manteno shall pay a civil penalty of Ten Thousand Dollars (\$10,000.00).

Payment shall be tendered at time of entry of the Consent Order.

2. The civil penalty payment shall be made by certified check or money order payable to the Illinois EPA for deposit into the Environmental Protection Trust Fund ("EPTF").

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

B. Stipulated Penalties, Interest and Default

1. If HH Manteno fails to complete any activity or fails to comply with any response or reporting requirement by the date specified in this Consent Order, HH Manteno shall provide notice to the Plaintiff of each failure to comply with this Consent Order and shall pay stipulated penalties in the amount of \$400.00 per day per violation for up to the first fifteen (15) days of violation, \$500.00 per day per violation for the next fifteen (15) days of violation, and \$1,000.00

per day per violation thereafter until such time that compliance is achieved. The Plaintiff may make a demand for stipulated penalties upon HH Manteno for its noncompliance with this Consent Order. However, failure by the Plaintiff to make this demand shall not relieve HH Manteno of the obligation to pay stipulated penalties. All stipulated penalties shall be payable within thirty (30) calendar days of the date HH Manteno knows or should have known of its noncompliance with any provision of this Consent Order.

2. Pursuant to Section 42(g) of the Act, interest shall accrue on any penalty amount owed by HH Manteno 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.

3. The stipulated penalties shall be enforceable by the Plaintiff and shall be in addition to, and shall not preclude the use of, any other remedies or sanctions arising from the failure to comply with this Consent Order.

C. Stipulated Penalty and Interest Payment Procedures

1. All payments required by Section III.B of this Consent Order shall be made by certified check or money order payable to the Illinois EPA for deposit into the EPTF. Payments shall be sent by first class mail and delivered to:

Illinois Environmental Protection Agency
Fiscal Services
1021 North Grand Avenue East
P.O. Box 19276
Springfield, IL 62794-9276

2. The case name and case number shall appear on the face of the certified check or money order. A copy of the certified check or money order and any transmittal letter shall be

sent to:

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

D. Future Compliance

1. On or before September 1, 2024, HH Manteno shall replace the STP clarifier's existing failing weir with a new weir and submit documentation to Illinois EPA via email to the persons identified in Section III.H. of this Consent Order demonstrating the existing weir's replacement.

2. On or before December 31, 2024, HH Manteno shall install a sump pump at the STP's clarifier sludge return system and submit documentation to Illinois EPA via email to the persons identified in Section III.H. of this Consent Order demonstrating the installation of the sump pump at the STP's clarifier sludge return system.

3. On or before December 31, 2024, HH Manteno shall replace sewer line sections at the park identified as contributing to inflow and infiltration in the STP system and submit documentation to Illinois EPA via email to the persons identified in Section III.H. of this Consent Order demonstrating the replacement of sewer line sections at the park contributing to inflow and infiltration in the STP system.

4. On or before March 1, 2025, HH Manteno shall submit a status report to Plaintiff via email to the persons identified in Section III.H. of this Consent Order. This status report shall either (a) demonstrate that HH Manteno returned to and maintained compliance with the terms and conditions of its NPDES Permit No. IL0038199 including, but not limited to, terms and conditions limiting effluent concentration for total suspended solids, nitrogen, and carbonaceous

biochemical oxygen demand; or (b) notify Plaintiff that further actions will be necessary to achieve and maintain compliance with the terms and conditions of NPDES Permit No. IL0038199.

5. If HH Manteno provides notification of compliance under Section III.D.4(a) of the Consent Order, thereafter HH Manteno shall maintain compliance with the terms and conditions of its NPDES Permit No IL0038199 including, but not limited to, the effluent concentration limits for total suspended solids, nitrogen and carbonaceous biochemical oxygen demand.

6. If HH Manteno provides a notification under Section III.D.4(b) of the Consent Order that further actions will be necessary to achieve and maintain compliance, on or before May 1, 2025, HH Manteno shall submit a plan to Illinois EPA via email to the persons identified in Section III.H. of this Consent Order, for review and approval, for such actions, including a schedule for implementation.

7. If Plaintiff and/or Illinois EPA approves such plan, the Parties to the Consent Order will modify this Consent Order via Section III.F of this Consent Order.

8. If the Plaintiff and/or Illinois EPA approves any plan or submittal, the Defendant shall implement the approved plan or other submittal pursuant to the approved schedule. If the Plaintiff and/or Illinois EPA approves with conditions or disapproves of any plan or other submittal, or any revisions thereto, the Defendant shall, within twenty-one (21) days after receiving written notice of such approval with conditions or disapproval, submit a proposal that addresses the Plaintiff's and/or Illinois EPA's conditions or reasons for disapproval. This process shall continue until the Plaintiff and/or Illinois EPA approves the document or either party invokes the Dispute Resolution provision in Section III.H of this Consent Order as to that

document.

9. The Illinois EPA, its employees and representatives, and the Attorney General, his employees and representatives, shall have the right of entry into and upon the HH Manteno's Site which is the subject of this Consent Order, 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, and the Attorney General, his employees and representatives, may take photographs, samples, and collect information, as they deem necessary.

10. This Consent Order in no way affects the responsibilities of HH Manteno to comply with any other federal, state or local laws or regulations, including but not limited to the Act, Board Regulations, and the terms and conditions of NPDES Permit No. IL0038199.

11. HH Manteno shall cease and desist from future violations of the Act, Board Regulations, and the terms and conditions of NPDES Permit No. IL0038199 that were the subject matter of the Complaint.

E. *Force Majeure*

1. *Force majeure* is an event arising solely beyond the control of HH Manteno, which prevents the timely performance of any of the requirements of this Consent Order and shall include, but is not limited to, events such as floods, fires, tornadoes, other natural disasters, and labor disputes beyond the reasonable control of HH Manteno. An increase in costs associated with implementing any requirement of this Consent Order shall not, by itself, excuse HH Manteno for a failure to comply with such a requirement.

2. When a *force majeure* event occurs which causes or may cause a delay in the performance of any of the requirements of this Consent Order, HH Manteno shall orally notify the Illinois EPA via Plaintiff's representatives listed in Section III.H of this Consent Order

within forty-eight (48) hours of the occurrence. Written notice shall be given to the Plaintiff's representatives as listed in Section III.H of this Consent Order as soon as practicable, but no later than ten (10) calendar days after the claimed occurrence. This section shall be of no effect as to the particular event involved if HH Manteno fails to comply with these notice requirements.

3. Within ten (10) calendar days of receipt of any written *force majeure* notice, the Plaintiff shall respond in writing regarding HH Manteno's claim of a delay or impediment to performance. If the Plaintiff agrees that the delay or impediment to performance has been or will be caused by circumstances beyond the control of HH Manteno and that HH Manteno could not have prevented the delay by the exercise of due diligence, the parties shall stipulate to an extension of the required deadline(s) for all requirement(s) affected by the delay, by a period equivalent to the delay actually caused by such circumstances. Such stipulation may be filed as a modification to this Consent Order. HH Manteno shall not be liable for stipulated penalties for the period of any such stipulated extension.

4. If the Plaintiff does not accept HH Manteno's claim of a *force majeure* event, HH Manteno must file a petition with the Court within twenty (20) calendar days of receipt of the Plaintiff's determination in order to contest the imposition of stipulated penalties. The Plaintiff shall have twenty (20) calendar days to file its response to said petition. The burden of proof of establishing that a *force majeure* event prevented the timely performance shall be upon HH Manteno. If this Court determines that the delay or impediment to performance has been or will be caused by circumstances solely beyond the control of HH Manteno and that HH Manteno could not have prevented the delay by the exercise of due diligence, HH Manteno shall be excused as to that event (including any imposition of stipulated penalties), for all requirements affected by the delay, for a period of time equivalent to the delay or such other period as may be

determined by this Court.

F. Enforcement and Modification of Consent Order

1. This Consent Order is a binding and enforceable order of this Court. This Court shall retain jurisdiction of this matter and shall consider any motion by any party for the purposes of interpreting and enforcing the terms and conditions of this Consent Order. HH Manteno agrees that notice of any subsequent proceeding to enforce this Consent Order may be made by mail and waives any requirement of service of process.

2. The Parties to the Consent Order may, by mutual written consent, extend any compliance dates or modify the terms of this Consent Order without leave of this Court. A request for any modification shall be made in writing and submitted to the representatives designated in Section III.H of this Consent Order. Any such request shall be made by separate document, and shall not be submitted within any other report or submittal required by this Consent Order. Any such agreed modification shall be in writing and signed by authorized representatives of each party, for filing and incorporation by reference into this Consent Order.

G. Dispute Resolution

1. Except as provided herein, the Parties to the Consent Order may seek to informally resolve disputes arising under this Consent Order, including but not limited to the Illinois EPA's decision regarding appropriate or necessary response activity, approval or denial of any report, plan or remediation objective, or the Plaintiff's rejection of a request for modification or termination of the Consent Order. The Plaintiff reserves the right to seek enforcement by the Court where HH Manteno has failed to satisfy any compliance deadline within this Consent Order. The following are also not subject to the dispute resolution procedures provided by this section: a claim of *force majeure*, a failure to make any required

payment and any circumstances posing a substantial danger to the environment or to the public health or welfare of persons.

2. The dispute resolution procedure must be invoked by a party through a written notice describing the nature of the dispute and the party's position with regard to such dispute. The other party shall acknowledge receipt of the notice and schedule a meeting to discuss the dispute informally not later than fourteen (14) calendar days from the receipt of such notice. These informal negotiations shall be concluded within thirty (30) calendar days from the date of the first meeting between the parties, unless the parties agree, in writing, to shorten or extend this period. The invocation of dispute resolution, in and of itself, shall not excuse compliance with any requirement, obligation or deadline contained herein, and stipulated penalties may be assessed for failure or noncompliance during the period of dispute resolution. As part of the resolution of any dispute, the Parties to the Consent Order, by agreement or by order of this Court, may extend or modify the schedule for completion of work under this Consent Order to account for the delay in the work that occurred as a result of dispute resolution.

3. In the event that the parties are unable to reach agreement during the informal negotiation period, the Plaintiff shall provide HH Manteno with a written summary of its position regarding the dispute. The position advanced by the Plaintiff shall be considered binding unless, within twenty (20) calendar days of HH Manteno's receipt of the written summary of the Plaintiff's position, HH Manteno files a petition with this Court seeking judicial resolution of the dispute. The Plaintiff shall respond to the petition by filing the administrative record of the dispute and any argument responsive to the petition within twenty (20) calendar days of service of HH Manteno's petition. The administrative record of the dispute shall include the written notice of the dispute, any responsive submittals, the Plaintiff's written summary of its position,

HH Manteno's petition before the Court and the Plaintiff's response to the petition. The Plaintiff's position shall be affirmed unless, based upon the administrative record, it is against the manifest weight of the evidence.

H. Notice and Submittals

Except for payments, the submittal of any notice, reports or other documents required under this Consent Order, shall be delivered to the following designated representatives:

As to the Plaintiff

Kevin Garstka
Assistant Attorney General
Environmental Bureau
Illinois Attorney General's Office
69 W. Washington Street, Suite 1800
Chicago, Illinois 60602
Kevin.garstka@ilag.gov
(773) 590-7029

Gabriel Neibergall
Assistant Counsel, Division of Legal Counsel
Illinois Environmental Protection Agency
1021 North Grand Avenue East
P.O. Box 19276
Springfield, Illinois 62794-9276
Gabriel.Neibergall@illinois.gov
(217)-7854824

Todd Bennett
Illinois EPA, Division of Water
Pollution Control
Field Operations Section Manager
1021 North Grand Avenue East
Springfield, Illinois 62794-9276
(217) 782-8367

As to the Defendant

S. Lee Johnson
Honigman LLP
660 Woodward Ave
Suite #2290

Detroit, MI 48226
(313) 465-7432
sljohnson@honigman.com

Todd Woodruff
HH Manteno MHP, LLC
PO Box 340256
Austin, TX 78734
todd@woodlandleasing.com
(832) 285-2056

I. Release from Liability

In consideration of HH Manteno's payment of a \$10,000.00 penalty, its commitment to cease and desist as contained in Section III.D.11 above, and completion of all activities required hereunder, the Plaintiff releases, waives and discharges HH Manteno 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 Plaintiff's Complaint filed on February 28, 2024. The Plaintiff reserves, and this Consent Order is without prejudice to, all rights of the State of Illinois against HH Manteno with respect to all other matters, including but not limited to the following:

- a. criminal liability;
- b. liability for future violations;
- c. liability for natural resources damage arising out of the alleged violations; and
- d. HH Manteno's failure to satisfy the requirements of this Consent Order.

Nothing in this Consent Order 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, other than HH Manteno.

J. Notice and Public Comment

After this Consent Order is signed by all the Parties to the Consent Order but prior to entry by the Court, it shall be posted on the Illinois EPA's website for a period of not less than thirty (30) days for public notice and comment. The Plaintiff reserves the right to withdraw or withhold its consent prior to entry by the Court if the comments regarding the Consent Order disclose facts or considerations which indicate that the Consent Order is inappropriate, improper, or inadequate. HH Manteno consents to the entry of this Consent Order and agrees not to withdraw from or oppose the entry of this Consent Order or to challenge any provision of the Consent Order unless the Plaintiff has notified HH Manteno in writing that it withdraws or withholds its consent for the Consent Order. In the event the Plaintiff notifies HH Manteno that it withdraws or withholds its consent for the Consent Order, then the terms of the agreement may not be used as evidence in any litigation between those entities.

L. Execution and Entry of Consent Order

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

[THE REMAINDER OF THIS PAGE IS INTENTIONALLY LEFT BLANK]

WHEREFORE, the parties, by their representatives, enter into this Consent Order and submit it to this Court that it may be approved and entered.

AGREED:

FOR THE PLAINTIFF:

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

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

ILLINOIS ENVIRONMENTAL
PROTECTION AGENCY

JAMES JENNINGS, Director
Illinois Environmental Protection Agency

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

BY: _____
ANDREW B. ARMSTRONG
Chief Legal Counsel

DATE: _____

DATE: _____

FOR THE DEFENDANT:

HH MANTENO MHP, LLC

ENTERED:

BY: _____


Its: _____
Manager

J U D G E

DATE: _____

DATE: _____
August 19, 2024


WHEREFORE, the parties, by their representatives, enter into this Consent Order and submit it to this Court that it may be approved and entered.

AGREED:

FOR THE PLAINTIFF:

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

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

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

DATE: 9/13/24

ILLINOIS ENVIRONMENTAL
PROTECTION AGENCY

JAMES M. JENNINGS, Interim Director
Illinois Environmental Protection Agency

BY: 
ANDREW B. ARMSTRONG
Chief Legal Counsel

DATE: 09/13/2024

FOR THE DEFENDANT:

HH MANTENO MHP, LLC

BY: _____

Its: _____

DATE: _____

ENTERED:

J U D G E

DATE: _____

**IN THE CIRCUIT COURT OF THE TWENTY-FIRST JUDICIAL CIRCUIT
KANKAKEE COUNTY, ILLINOIS
CHANCERY DIVISION**

PEOPLE OF THE STATE OF ILLINOIS,)	
<i>ex rel.</i> KWAME RAOUL, Attorney)	
General of the State of Illinois,)	
)	
Plaintiff,)	
)	
v.)	No. 2024CH11
)	
STONETOWN MANTENO, LLC,)	
a Colorado limited liability company,)	
d/b/a MANTENO MOBILE HOME)	
PARK, and HH MANTENO MHP, LLC,)	
a Delaware limited liability company,)	
)	
Defendants.)	

COMPLAINT FOR INJUNCTIVE RELIEF AND CIVIL PENALTIES

Plaintiff, PEOPLE OF THE STATE OF ILLINOIS, *ex rel.* KWAME RAOUL, Attorney General of the State of Illinois, on his own motion and at the request of the ILLINOIS ENVIRONMENTAL PROTECTION AGENCY, complains of Defendants, STONETOWN MANTENO, LLC, a Colorado limited liability company, d/b/a MANTENO MOBILE HOME PARK (“Stonetown”), and HH MANTENO MHP, LLC, a Delaware limited liability company (“HH Manteno”), as follows:

COUNT I
VIOLATION OF NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM
(“NPDES”) PERMIT EFFLUENT LIMITATIONS
AS TO DEFENDANTS STONETOWN AND HH MANTENO

1. This Count is brought on behalf of the PEOPLE OF THE STATE OF ILLINOIS, *ex rel.* KWAME RAOUL, Attorney General of the State of Illinois, on his own motion and at the request of the Illinois Environmental Protection Agency (“Illinois EPA”), against Defendants,

pursuant to Section 42(d) and (e) of the Illinois Environmental Protection Act (“Act”), 415 ILCS 5/42(d) and (e) (2022).

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), and charged with, *inter alia*, the duty of enforcing the Act.

3. At all times relevant to this Complaint, Stonetown has been and is a Colorado limited liability company. On September 6, 2022, Stonetown withdrew its limited liability company from the State of Illinois. On July 8, 2022, Stonetown dissolved its limited liability company in the State of Colorado.

4. At all times relevant to this Complaint, HH Manteno has been and is a Delaware limited liability company, in good standing with the Illinois Secretary of State.

5. From at least October 1, 2017 through September 27, 2021, Stonetown owned and operated a sewage treatment plant (“STP”) at its mobile home park (“the Park”), located at 9000 E. Witaker Road, Manteno, Kankakee County, Illinois (PIN 02-03-17-300-002), which collects and treats wastewater for the park’s 74 single family dwellings.

6. On September 28, 2021, Stonetown sold Manteno Mobile Home Park to HH Manteno.

7. From September 28, 2021 through the date of filing of this Complaint, HH Manteno has owned and operated the STP at the Park.

8. Stonetown discharged and HH Manteno discharges wastewater from the Park’s STP through its Outfall 001 into the Exline Slough, a tributary to Baker Creek, which is a tributary to the Kankakee River.

9. Section 402 of the federal Clean Water Act (“CWA”), 33 U.S.C. § 1342, establishes the National Pollutant Discharge Elimination System (“NPDES”) program to address water pollution by regulating point sources that discharge pollutants to the waters of the United States.

10. The United States Environmental Protection Agency has authorized the State of Illinois to issue NPDES permits through the Illinois EPA in compliance with NPDES federal regulations.

11. Section 12(f) of the Act, 415 ILCS 5/12(f) (2022), provides as follows:

No person shall:

* * *

- (f) Cause, threaten or allow the discharge of any contaminant into the waters of the State, as defined herein, including but not limited to, waters to any sewage works, or into any well or from any point source within the State, without an NPDES permit for point source discharges issued by the Agency under Section 39(b) of this Act, or in violation of any term or condition imposed by such permit, or in violation of any NPDES permit filing requirement established under Section 39(b), or in violation of any regulations adopted by the Board or of any order adopted by the Board with respect to the NPDES program.

12. Section 309.102(a) of the Illinois Pollution Control Board (“Board”) Water Pollution Regulations, 35 Ill. Adm. Code 309.102(a), provides as follows:

Except as in compliance with the provisions of the Act, Board Regulations, and the CWA, and the provisions and conditions of the NPDES permit issued to the discharger, the discharge of any contaminant or pollutant by any person into the waters of the State from a point source or into a well shall be unlawful.

13. Section 3.315 of the Act, 415 ILCS 5/3.315 (2022), provides the following definition:

“Person” means 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.

14. Stonetown, a limited liability company, is a “person” as that term is defined in Section 3.315 of the Act, 415 ILCS 5/3.315 (2022).

15. HH Manteno, a limited liability company, is a “person” as that term is defined in Section 3.315 of the Act, 415 ILCS 5/3.315 (2022).

16. Section 3.165 of the Act, 415 ILCS 5/3.165 (2022), provides the following definition:

“Contaminant” is any solid, liquid, or gaseous matter, any odor, or any form of energy, from whatever source.

17. The wastewater discharged from Defendants’ STP is a “contaminant,” as that term is defined by Section 3.165 of the Act, 415 ILCS 5/3.165 (2022).

18. Section 3.550 of the Act, 415 ILCS 5/3.550 (2022), provides the following definition:

“Waters” means all accumulations of water, surface and underground, natural, and artificial, public and private, or parts thereof, which are wholly or partially within, flow through, or border upon the State.

19. The Exline Slough constitutes “waters” as that term is defined in Section 3.550 of the Act, 415 ILCS 5/3.550 (2022).

20. Section 401.11(d) of the Code of Federal Regulations (“C.F.R.”), 40 C.F.R. 401.11(d), provides as follows:

The term point source means any discernible, confined and discrete conveyance, including but not limited to any pipe, ditch, channel, tunnel, conduit, well, discrete fissure, container, rolling stock, concentrated animal feeding operation, or vessel or other floating craft, from which pollutants are or may be discharged.

21. Defendants' STP Outfall 001 is a "point source" within the meaning of 40 C.F.R. 401.11(d).

22. Defendants are required to have an NPDES permit for wastewater discharges from their STP pursuant to Section 12(f) of the Act, 415 ILCS 5/12(f) (2022).

23. On September 27, 2017, Illinois EPA issued to Stonetown NPDES permit No. IL0038199 ("NPDES Permit") for discharges of wastewater from its STP, with an effective date of October 1, 2017, and expiration date of September 30, 2022.

24. On September 16, 2022, Illinois EPA re-issued to HH Manteno the NPDES Permit for discharges of wastewater from its STP, with an effective date of October 1, 2022, and expiration date of September 30, 2027.

25. Defendants' NPDES Permit includes, among other things, discharge limitations, including effluent limits for total suspended solids ("TSS"), carbonaceous biochemical oxygen demand ("CBOD"), and Nitrogen ("N").

26. From October 1, 2017 to September 27, 2021, the effluent Stonetown discharged from its STP contained TSS and N.

27. From September 28, 2021 and continuing through the date of filing of this Complaint, the effluent HH Manteno discharges from its STP contains TSS and N.

28. The following concentration limits described in milligrams per liter ("mg/L") are set forth in Defendants' NPDES Permit for TSS, CBOD, and N:

PARAMETER	CONCENTRATION LIMITS mg/L (Monthly Average)
TSS	12
CBOD	10
Ammonia as N:	
• April – May/September - October	1.5
• June - August	1.5

• November - February	4.0
• March	2.4

29. Section 304.141(a) of the Board Water Pollution Regulations, 35 Ill. Adm. Code 304.141(a), provides as follows:

NPDES Effluent Standards

- a. No person to whom an NPDES Permit has been issued may discharge any contaminant in his effluent in excess of the standards and limitations for that contaminant which are set forth in his permit.

30. As recorded on Stonetown's monthly Discharge Monitoring Reports ("DMRs"), from December 31, 2019 to September 27, 2021, the effluent Stonetown discharged from its STP contained the following concentrations of TSS that exceeded the monthly average limit set forth in its NPDES Permit:

Parameter	Sample Value (mg/L)	Concentration Limit – Monthly Average (mg/L)	Monitoring Period End Date
TSS	24	12	01/31/2020
TSS	36.5	12	02/29/2020
TSS	29.5	12	03/31/2020
TSS	41	12	04/30/2020
TSS	40.8	12	05/31/2020
TSS	19.2	12	06/30/2020
TSS	39	12	07/31/2020
TSS	132	12	08/31/2020
TSS	21	12	09/30/2020
TSS	63	12	10/31/2020
TSS	90	12	11/30/2020
TSS	66	12	12/31/2020
TSS	49	12	01/31/2021
TSS	29	12	02/28/2021
TSS	36	12	03/31/2021
TSS	27	12	04/30/2021
TSS	18	12	05/31/2021
TSS	27	12	06/30/2021
TSS	26	12	07/31/2021
TSS	25	12	08/31/2021

31. As recorded on HH Manteno's monthly DMRs, from September 28, 2021 to the date of filing of this Complaint, the effluent HH Manteno discharged from its STP contained the following concentrations of TSS that exceeded the monthly average limit set forth in its NPDES Permit:

Parameter	Sample Value (mg/L)	Concentration Limit – Monthly Average (mg/L)	Monitoring Period End Date
TSS	35	12	09/30/2021
TSS	26	12	10/31/2021
TSS	28	12	11/30/2021
TSS	25	12	12/31/2021
TSS	22	12	01/31/2022
TSS	58	12	02/28/2022
TSS	14	12	03/31/2022
TSS	46	12	04/30/2022
TSS	36	12	05/31/2022
TSS	42	12	06/30/2022
TSS	16	12	07/31/2022
TSS	44	12	08/31/2022
TSS	59	12	09/30/2022
TSS	38	12	10/31/2022
TSS	58	12	11/30/2022
TSS	37	12	12/31/2022
TSS	26	12	01/31/2023
TSS	25	12	02/28/2023
TSS	29	12	03/31/2023
TSS	60	12	04/30/2023
TSS	63	12	05/31/2023
TSS	132	12	06/30/2023
TSS	56	12	07/31/2023
TSS	61	12	08/31/2023
TSS	17	12	09/30/2023
TSS	90	12	10/31/2023
TSS	59	12	11/30/2023
TSS	42	12	12/31/2023

32. As recorded on Stonetown's monthly DMRs, from December 31, 2019 to September 27, 2021, the effluent Stonetown discharged from its STP contained the following concentrations of CBOD that exceeded the monthly average limit set forth in its NPDES Permit:

Parameter	Sample Value (mg/L)	Concentration Limit – Monthly Average (mg/L)	Monitoring Period End Date
CBOD	20.1	10	01/31/2020
CBOD	14.8	10	02/29/2020
CBOD	19.8	10	03/31/2020
CBOD	23.3	10	04/30/2020
CBOD	23.7	10	05/31/2020
CBOD	105	10	08/31/2020
CBOD	23	10	09/30/2020
CBOD	46	10	10/31/2020
CBOD	166	10	11/30/2020
CBOD	14	10	12/31/2020
CBOD	23	10	01/31/2021
CBOD	15	10	02/28/2021
CBOD	21	10	03/31/2021
CBOD	12	10	04/30/2021
CBOD	14	10	05/31/2021
CBOD	16	10	07/31/2021
CBOD	63	10	08/31/2021

33. As recorded on HH Manteno's monthly DMRs, from September 28, 2021 to the date of filing of this Complaint, the effluent HH Manteno discharged from its STP contained the following concentrations of CBOD that exceeded the monthly average limit set forth in its NPDES Permit:

Parameter	Sample Value (mg/L)	Concentration Limit – Monthly Average (mg/L)	Monitoring Period End Date
CBOD	20	10	09/30/2021
CBOD	18	10	11/30/2021
CBOD	16	10	12/31/2021
CBOD	22	10	01/31/2022
CBOD	35	10	02/28/2022
CBOD	20	10	03/31/2022
CBOD	21	10	05/31/2022
CBOD	23	10	06/30/2022
CBOD	13	10	07/31/2022
CBOD	19	10	08/31/2022
CBOD	28	10	09/30/2022
CBOD	27	10	10/31/2022
CBOD	35	10	11/30/2022
CBOD	29	10	12/31/2022

CBOD	14	10	02/28/2023
CBOD	22	10	03/31/2023
CBOD	34	10	04/30/2023
CBOD	36	10	05/31/2023
CBOD	37	10	06/30/2023
CBOD	30	10	07/31/2023
CBOD	17	10	08/31/2023
CBOD	16	10	10/31/2023
CBOD	19	10	11/30/2023
CBOD	12	10	12/31/2023

34. As recorded on Stonetown's monthly DMRs, from January 31, 2020 to September 27, 2021, the effluent Stonetown discharged from its STP contained the following concentrations of N that exceeded monthly average limit set forth in its NPDES Permit:

Parameter	Sample Value (mg/L)	Concentration Limit – Monthly Average (mg/L)	Monitoring Period End Date
N	4.32	4	02/29/2020
N	5.74	2.4	03/31/2020
N	5.66	1.5	04/30/2020
N	1.76	1.5	05/31/2020
N	1.59	1.5	06/30/2020
N	7.26	1.5	07/31/2020
N	19.1	1.5	08/31/2020
N	18.6	1.5	09/30/2020
N	19	1.5	10/31/2020
N	19.6	4	11/30/2020
N	17.6	4	12/31/2020
N	11.3	4	01/31/2021
N	8.25	4	02/28/2021
N	8.41	2.4	03/31/2021
N	10.7	1.5	04/30/2021
N	5.89	1.5	05/31/2021
N	9.18	1.5	07/31/2021
N	14	1.5	08/31/2021

35. As recorded on HH Manteno's monthly DMRs, from September 28, 2021 to the date of filing of this Complaint, the effluent HH Manteno discharged from its STP contained the following concentrations of N that exceeded monthly average limit set forth in its NPDES Permit:

Parameter	Sample Value (mg/L)	Concentration Limit – Monthly Average (mg/L)	Monitoring Period End Date
N	11	1.5	09/30/2021
N	3.13	1.5	10/31/2021
N	6.32	4	11/30/2021
N	6.17	4	12/31/2021
N	6.32	4	01/31/2022
N	5.31	4	02/28/2022
N	4.56	2.4	03/31/2022
N	8	1.5	04/30/2022
N	5.19	1.5	05/31/2022
N	6.41	1.5	06/30/2022
N	4.91	1.5	07/31/2022
N	14.6	1.5	08/31/2022
N	17.7	1.5	09/30/2022
N	14.3	1.5	10/31/2022
N	15.7	4	11/30/2022
N	15.7	4	12/31/2022
N	10.1	4	01/31/2023
N	4.71	4	02/28/2023
N	7.27	2.4	03/31/2023
N	12.6	1.5	04/30/2023
N	17	1.5	06/30/2023
N	11.3	1.5	07/31/2023
N	17.3	1.5	08/31/2023
N	17.9	1.5	09/30/2023
N	25.2	1.5	10/31/2023
N	11.1	4	11/30/2023

36. By discharging effluent from its facility that exceeded NPDES Permit concentration limits for TSS, CBOD, and N, from January 1, 2020 through September 27, 2021, Stonetown violated Sections 304.141(a) and 309.102(a) of the Board Water Pollution Regulations, 35 Ill. Adm. Code 304.141(a) and 309.102(a), and thereby also violated Section 12(f) of the Act, 415 ILCS 5/12(f) (2022) and the terms and conditions of its NPDES Permit.

37. By discharging effluent from its facility that exceeded NPDES Permit concentration limits for TSS, CBOD, and N, from September 28, 2021 through the date of filing of this Complaint, HH Manteno violated Sections 304.141(a) and 309.102(a) of the Board Water

Pollution Regulations, 35 Ill. Adm. Code 304.141(a) and 309.102(a), and thereby also violated Section 12(f) of the Act, 415 ILCS 5/12(f) (2022) and the terms and conditions of its NPDES Permit.

38. Violations of the pertinent environmental statutes and regulations will continue unless and until this Court grants equitable relief in the form of preliminary and, after trial, permanent injunctive relief.

WHEREFORE, Plaintiff, PEOPLE OF THE STATE OF ILLINOIS, respectfully requests that this Court enter a preliminary and, after a trial, permanent injunction in favor of Plaintiff and against Defendants, STONETOWN MANTENO, LLC, d/b/a MANTENO MOBILE HOME PARK, and HH MANTENO MHP, LLC, with respect to Count I:

1. Finding that Defendants each violated Section 12(f) of the Act, 415 ILCS 5/12(f) (2022), Sections 304.141(a) and 309.102(a) of the Board Water Pollution Regulations, 35 Ill. Adm. Code 304.141(a) and 309.102(a), and the terms and conditions of their NPDES Permit;

2. Enjoining each of the Defendants from any future violations of Section 12(f) of the Act, 415 ILCS 5/12(f) (2022), Sections 304.141(a) and 309.102(a) of the Board Water Pollution Regulations, 35 Ill. Adm. Code 304.141(a) and 309.102(a), and the terms and conditions of their NPDES Permit;

3. Ordering HH Manteno to immediately take the necessary corrective action that will result in a final and permanent abatement of the violations of Section 12(f) of the Act, 415 ILCS 5/12(f) (2022), Sections 304.141(a) and 309.102(a) of the Board Water Pollution Regulations, 35 Ill. Adm. Code 304.141(a) and 309.102(a), and the terms and conditions of its NPDES Permit;

4. Assessing against each of the Defendants a civil penalty of Ten Thousand Dollars (\$10,000.00) for each day of violation of Section 12(f) of the Act, 415 ILCS 5/12(f) (2022),

Sections 304.141(a) and 309.102(a) of the Board Water Pollution Regulations, 35 Ill. Adm. Code 304.141(a) and 309.102(a), and the terms and conditions of their NPDES Permit;

5. Ordering each of the Defendants to pay all costs, pursuant to Section 42(f) of the Act, 415 ILCS 5/42(f) (2022), including any attorney, expert witness, and consultant fees expended by the State in its pursuit of this action; and

6. Granting such other relief as this Court deems appropriate and just.

COUNT II
CAUSING, THREATENING, OR ALLOWING WATER POLLUTION
AS TO DEFENDANTS STONETOWN AND HH MANTENO

1-34. Plaintiff realleges and incorporates herein paragraphs 1 through 10, 13 through 28, and 30 through 37 of Count I, as paragraphs 1 through 34 of this Count II.

35. Section 12(a) of the Act, 415 ILCS 5/12(a) (2022), provides, as follows:

No person shall:

Cause or threaten or allow the discharge of any contaminants into the environment in any State so as to cause or tend to cause water pollution in Illinois, either alone or in combination with matter from other sources, or so as to violate regulations or standards adopted by the Pollution Control Board under the Act.

36. Section 3.545 of the Act, 415 ILCS 5/3.545 (2022), provides the following definition:

“Water pollution” is such alteration of the physical, thermal, chemical, biological or radioactive properties of any waters of the State, or such discharge of any contaminant into any waters of the State, as will or is likely to create a nuisance or render such waters harmful or detrimental or injurious to public health, safety or welfare, or to domestic, commercial, industrial, agricultural, recreational, or other legitimate uses, or to livestock, wild animals, birds, fish, or other aquatic life.

37. From January 1, 2020 through September 27, 2021, Stonetown’s discharge of TSS and N into the Exline Slough in concentrations that exceeded the limits set forth in its NPDES Permit and caused CBOD in excess of its NPDES Permit has created a nuisance or

rendered such waters harmful or detrimental to public health, safety or welfare, or to legitimate uses and thus constitutes “water pollution” as that term is defined in Section 3.545 of the Act, 415 ILCS 5/3.545 (2022).

38. From September 28, 2021 to the date of filing of this Complaint, HH Manteno’s discharge of TSS and N into the Exline Slough in concentrations that exceeded the limits set forth in its NPDES Permit and caused CBOD in excess of its NPDES Permit has created a nuisance or rendered such waters harmful or detrimental to public health, safety or welfare, or to legitimate uses and thus constitutes “water pollution” as that term is defined in Section 3.545 of the Act, 415 ILCS 5/3.545 (2022).

39. By causing and/or allowing contaminants to be discharged into waters of the State in concentrations that exceeded its NPDES permit limits, Stonetown and HH Manteno each caused, threatened and/or allowed water pollution in violation of Section 12(a) of the Act, 415 ILCS 5/12(a) (2022).

40. Violations of the pertinent environmental statutes and regulations will continue unless and until this Court grants equitable relief in the form of preliminary and, after trial, permanent injunctive relief.

WHEREFORE, Plaintiff, PEOPLE OF THE STATE OF ILLINOIS, respectfully requests that this Court enter a preliminary and, after a trial, permanent injunction in favor of Plaintiff and against Defendants, STONETOWN MANTENO, LLC, d/b/a MANTENO MOBILE HOME PARK, and HH MANTENO MHP, LLC, with respect to Count II:

1. Finding that Defendants each violated Section 12(a) of the Act, 415 ILCS 5/12(a) (2022);

2. Enjoining each of the Defendants from any future violations of Section 12(a) of the Act, 415 ILCS 5/12(a) (2022);

3. Ordering HH Manteno to immediately take the necessary corrective action that will result in a final and permanent abatement of the violations of Section 12(a) of the Act, 415 ILCS 5/12(a) (2022);

4. Assessing against each of the Defendants a civil penalty of Fifty Thousand Dollars (\$50,000.00) for each violation of the Act, and an additional civil penalty of Ten Thousand Dollars (\$10,000.00) for each day of violation;

5. Ordering each of the Defendants to pay all costs, pursuant to Section 42(f) of the Act, 415 ILCS 5/42(f) (2022), including any attorney, expert witness, and consultant fees expended by the State in its pursuit of this action; and

6. Granting such other relief as this Court deems appropriate and just.

COUNT III
VIOLATION OF NPDES SPECIAL PERMIT CONDITION NO. 10
FOR DEFENDANT STONETOWN ONLY

1-19. Plaintiff realleges and incorporates herein paragraphs 1 through 3, 5, 8 through 14, and 16 through 23 of Count I, as paragraphs 1 through 19 of this Count III.

20. NPDES Permit No. IL0038199 includes, among other things, reporting requirements.

21. Special Condition No. 10 of the NPDES Permit provides as follows:

The Permittee shall submit to the IEPA, at a minimum, a semi-annual summary report of the quantities of sludge generated and disposed of, in units of dry tons or gallons (average total percent solids) by different disposal methods . . .

* * *

The Said reports shall be submitted to the IEPA by January 31 and July 31 of each year reporting the preceding January through June and July through December interval of sludge disposal operations.

22. NPDES Permit Special Condition No. 10 requires Stonetown to submit semi-annual sludge reports to Illinois EPA by January 31 and July 31 of each year reporting the preceding January through June and July through December intervals of sludge disposal operations.

23. On March 3, 2021, a minimum of approximately thirteen months late and a maximum of approximately 37 months late, Stonetown untimely submitted to Illinois EPA semi-annual sludge reports for the following: (1) July 1st through December 31st 2017 interval; (2) January 1st through June 30th 2018 interval; (3) July 1st through December 31st 2018 interval; (4) January 1st through June 30th 2019 interval; and (5) July 1st through December 31st 2019 interval, required by NPDES Permit Special Condition No. 10, thereby violating NPDES Permit Special Condition No. 10.

24. Section 305.102(b) of the Board Water Pollution Regulations, 35 Ill. Adm. Code 305.102(b), provides, in pertinent part, as follows:

Every holder of an NPDES ... permit is required to comply with the monitoring, sampling, recording and reporting requirements set forth in the permit and this Chapter.

25. By failing to timely comply with the reporting requirements set forth in Special Condition No. 10 of the NPDES Permit, Stonetown violated Section 305.102(b) of the Board Water Pollution Regulations, 35 Ill. Adm. Code 305.102(b), and thereby also violated Section 12(f) of the Act, 415 ILCS 5/12(f) (2022), Section 309.102(a) of the Board Water Pollution Regulations, 35 Ill. Adm. Code 309.102(a), and NPDES Permit Special Condition No. 10.

WHEREFORE, Plaintiff, PEOPLE OF THE STATE OF ILLINOIS, respectfully requests that this Court enter a preliminary and, after a trial, permanent injunction in favor of Plaintiff and against Defendant, STONETOWN MANTENO, LLC, d/b/a MANTENO MOBILE HOME PARK, with respect to Count III:

1. Finding Stonetown has violated Sections 12(f) of the Act, 415 ILCS 5/12(f) (2022), Sections 305.102(b) and 309.102(a) of the Board Water Pollution Regulations, 35 Ill. Adm. Code 305.102(b) and 309.102(a), and NPDES Permit Special Condition No. 10;

2. Enjoining Stonetown from any future violations of Section 12(f) of the Act, 415 ILCS 5/12(f) (2022), Sections 305.102(b) and 309.102(a) of the Board Water Pollution Regulations, 35 Ill. Adm. Code 305.102(b) and 309.102(a), and NPDES Permit Special Condition No. 10;

3. Assessing against Stonetown a civil penalty of Ten Thousand Dollars (\$10,000.00) for each day of violation of Section 12(f) of the Act, 415 ILCS 5/12(f) (2022), Sections 305.102(b) and 309.102(a) of the Board Water Pollution Regulations, 35 Ill. Adm. Code 305.102(b) and 309.102(a), and NPDES Permit Special Condition No. 10;

4. Ordering Stonetown to pay all costs, pursuant to Section 42(f) of the Act, 415 ILCS 5/42(f) (2022), including any attorney, expert witness, and consultant fees expended by the State in its pursuit of this action; and

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5. Granting such other relief as this Court deems appropriate and just.

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

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

BY: /s/ Stephen J. Sylvester
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