

**BEFORE THE BOARD OF COMMISSIONERS OF THE
METROPOLITAN WATER RECLAMATION DISTRICT OF GREATER CHICAGO**

METROPOLITAN WATER RECLAMATION)	
DISTRICT OF GREATER CHICAGO,)	
)	Case No. 23B-002
Complainant,)	
v.)	Show Cause Proceedings Under
)	Sewage & Waste Control Ordinance
CODY METAL FINISHING, INC.,)	
)	Hearing Officer Lesley D. Gool
Respondent.)	

AGREED ORDER OF SETTLEMENT

This matter comes before the assigned Hearing Officer, Lesley D. Gool, by agreement of Complainant Metropolitan Water Reclamation District of Greater Chicago (“District”), through its General Counsel Susan T. Morakalis, and Respondent Cody Metal Finishing, Inc. (“Cody Metal”), through its attorney David L. Rieser (collectively, the “Parties”), with due notice having been given and Hearing Officer Gool being fully advised in the premises.

I. STIPULATION OF FACTS

This stipulation of facts and jurisdiction is made and agreed upon for purposes of providing factual and jurisdictional bases for entry of this Agreed Order of Settlement (“Agreed Order”).

A. Parties and Background

1. The District is a body corporate and politic organized and existing under the laws of the State of Illinois for the purpose of collecting and treating sewage and industrial wastes, protecting the waterways, and reducing instances of flooding for its service area covering most of Cook County, Illinois. *See* 70 ILCS 2605/1, et seq.

2. At all relevant times, Cody Metal was:

- a) An Illinois corporation, organized and existing under the laws of the State of Illinois, engaged in the business of metal finishing and electroplating at

its facility located at 1620 North Throop Street in Chicago, Illinois (“Facility”), which contains a one-story commercial/industrial building and is located within the District’s service area.

- b) A categorical Significant Industrial User (“SIU”), as defined under Article II of the District’s Sewage & Waste Control Ordinance (“SWCO”), subject to the categorical pretreatment standards contained in Appendix C, Article III, Sections 1 (Categorical Standards) and 2 (Compliance Determination) of the SWCO, which mandate compliance with federal categorical pretreatment standards under 40 CFR 413, applicable to the Electroplating Point Source Category, and 40 CFR 433, applicable to the Metal Finishing Point Source Category.
- c) Authorized to, and has, discharged process wastewater from the Facility to a sewerage system tributary to the District’s water reclamation facilities pursuant to a current valid Discharge Authorization (“DA”) issued by the District for the Facility.
- d) Subject to Appendix B, Section 1 of the SWCO (Pollutant Concentration Limits) for discharges of process wastewater from the Facility to a sewerage system tributary to the District’s water reclamation facilities.
- e) Subject to Appendix C, Article I, Section 2 of the SWCO (Compliance Schedule), which makes it unlawful for any SIU to continue discharging process wastewater to a sewerage system under the District’s jurisdiction if the Executive Director has found the person to be in violation of the SWCO pursuant to any Cease & Desist Order (“C&D”) issued by the District, or that fails to comply with any compliance schedule submitted by the SIU to the District in response to any C&D issued by the District.
- f) Subject to Appendix D, Section 1 of the SWCO (Discharge Authorizations), which makes it unlawful for any SIU to cause or allow the discharge of process wastewater into the sewerage system under the District’s jurisdiction unless such SIU is in conformance with all terms and special conditions of a current valid DA, and Section 8, which authorizes the District’s Executive Director to order any person or entity that fails to comply with a C&D issued by the District to show cause why the DA should not be revoked.

3. The DA is known as Industrial User Discharge Authorization Nos. 12340-1 through

-12 (as renewed).

4. The DA authorizes the discharge of process wastewater from the Facility to a sewerage system tributary to the District's water reclamation facilities, subject to the terms and special conditions of the DA and any written renewal thereof subsequently issued by the District.

5. The DA authorizes sampling at the Facility from sampling point 3A, a manhole located in the parking area on Throop Street.

6. Special Condition 3 of the DA (Effluent Limits) provides that wastewater discharges at the indicated sampling point shall not exceed the DA's effluent limits at any time, including for Zinc. The DA's daily maximum effluent limit for Zinc is 2.51 mg/L and its monthly average effluent limit for Zinc is 1.42 mg/L, each based on the federal limits established for the Category 433, Metal Finishing Industrial Point Source Category, as adjusted by a combined wastestream formula factor of 0.960.

B. Jurisdiction over Show Cause Proceedings

7. Jurisdiction over these proceedings exists pursuant to Article VI of the SWCO (Administrative Proceedings).

8. Each C&D referenced below was served on Cody Metal on or about the date of issuance.

9. On May 15, 2023, the District filed with the District's Clerk a two-count Show Cause Complaint against Cody Metal for violations of the DA's daily maximum effluent limit for Zinc of 2.51 mg/L and its monthly average effluent limit for Zinc of 1.42 mg/L pertaining to wastewater discharges from the Facility into a sewerage system tributary to the District's water reclamation facilities based on sampling events occurring between January 2020 to November 2022.

10. The Show Cause Complaint notified and ordered Cody Metal to show cause before a Board of Commissioners (“Board”) appointed Hearing Officer on why it has failed or refused to comply with the C&Ds issued by the District and why the DA should not be revoked.

C. Cody Metal’s Violations of the SWCO

11. The Show Cause Complaint alleges violations of the SWCO based on the following seven (7) C&Ds and twenty-eight (28) amended C&Ds:

- a) C&D No. 95149 issued on or about March 11, 2020, for effluent violations of excessive concentrations of Zinc based upon the analytical results of samples collected by the District in January 2020
- b) Amended C&D No. 95149, referenced as Enforcement Action (“EA”) No. 95185, issued on or about April 9, 2020, for effluent violations self-reported by Cody Metal of excessive concentrations of Zinc based upon the analytical results of samples collected by Cody Metal in February 2020
- c) Amended C&D No. 95149, referenced as EA No. 95253, issued on or about May 7, 2020, for effluent violations self-reported by Cody Metal of excessive concentrations of Zinc based upon the analytical results of samples collected by the District in February 2020
- d) Amended C&D No. 95149, referenced as EA No. 95284, issued on or about May 28, 2020, for effluent violations of excessive concentrations of Zinc based upon the analytical results of samples collected by the District in March 2020
- e) Amended C&D No. 95149, referenced as EA No. 95332, issued on or about July 1, 2020, for effluent violations self-reported by Cody Metal of excessive concentrations of Zinc based upon the analytical results of samples collected by the District in May 2020
- f) C&D No. 95440 issued on or about August 4, 2020, for effluent violations of excessive concentrations of Zinc based upon the analytical results of samples collected by the District in June 2020
- g) Amended C&D No. 95440, referenced as EA No. 95517, issued on or about September 23, 2020, for effluent violations of excessive concentrations of Zinc based upon the analytical results of samples collected by the District in July and August 2020
- h) Amended C&D No. 95440, referenced as EA No. 95619, issued on or about November 10, 2020, for effluent violations of excessive concentrations of Zinc

based upon the analytical results of samples collected by the District in September 2020

- i) Amended C&D No. 95440, referenced as EA No. 95682, issued on or about December 10, 2020, for effluent violations of excessive concentrations of Zinc based upon the analytical results of samples collected by the District in October 2020
- j) C&D No. 95683 issued on or about December 10, 2020, for effluent violations of excessive concentrations of Zinc based upon the analytical results of samples collected by the District in October 2020
- k) Amended C&D No. 95683, referenced as EA No. 95751, issued on or about January 27, 2021, for effluent violations of excessive concentrations of Zinc based upon the analytical results of samples collected by the District in November 2020
- l) Amended C&D No. 95683, referenced as EA No. 95764, issued on or about February 5, 2021, for effluent violations of excessive concentrations of Zinc based upon the analytical results of samples collected by the District in December 2020
- m) Amended C&D No. 95683, referenced as EA No. 95807, issued on or about March 16, 2021, for effluent violations of excessive concentrations of Zinc based upon the analytical results of samples collected by the District in January 2021
- n) Amended C&D No. 95683, referenced as EA No. 95843, issued on or about April 1, 2021, for effluent violations of excessive concentrations of Zinc based upon the analytical results of samples collected by the District in February 2021
- o) Amended C&D No. 95683, referenced as EA No. 95903, issued on or about May 3, 2021, for effluent violations of excessive concentrations of Zinc based upon the analytical results of samples collected by the District in March 2021
- p) C&D No. 95893 issued on or about May 5, 2021, for effluent violations of excessive concentrations of Zinc based upon the analytical results of samples collected by the District and Cody Metal in March 2021
- q) Amended C&D No. 95893, referenced as EA No. 96020, issued on or about July 12, 2021, for effluent violations of excessive concentrations of Zinc based upon the analytical results of samples collected by the District in April and May 2021
- r) Amended C&D No. 95893, referenced as EA No. 96106, issued on or about August 24, 2021, for effluent violations of excessive concentrations of Zinc

based upon the analytical results of samples collected by the District in April, May, and June 2021

- s) Amended C&D No. 95893, referenced as EA No. 96345, issued on or about October 13, 2021, for effluent violations of excessive concentrations of Zinc based upon the analytical results of samples collected by the District in June, July, and August 2021
- t) C&D No. 96368 issued on or about October 13, 2021, for effluent violations of excessive concentrations of Zinc based upon the analytical results of samples collected by the District in August 2021
- u) Amended C&D No. 96368, referenced as EA No. 96450, issued on or about November 18, 2021, for effluent violations of excessive concentrations of Zinc based upon the analytical results of samples collected by the District and Cody Metal in September 2021
- v) Amended C&D No. 96368, referenced as EA No. 96558, issued on or about January 11, 2022, for effluent violations of excessive concentrations of Zinc based upon the analytical results of samples collected by the District in October and November 2021
- w) Amended C&D No. 96368, referenced as EA No. 96686, issued on or about March 8, 2022, for effluent violations of excessive concentrations of Zinc based upon the analytical results of samples collected by the District in December 2021 and January 2022
- x) Amended C&D No. 96368, referenced as EA No. 96867, issued on or about May 20, 2022, for effluent violations of excessive concentrations of Zinc based upon the analytical results of a sample collected by the District in November 2022
- y) C&D No. 96690 issued on or about March 9, 2022, for effluent violations of excessive concentrations of Zinc based upon the analytical results of samples collected by the District in January 2022
- z) Amended C&D No. 96690, referenced as EA No. 96770, issued on or about April 12, 2022, for effluent violations of excessive concentrations of Zinc based upon the analytical results of samples collected by the District in February 2022
- aa) Amended C&D No. 96690, referenced as EA No. 96883, issued on or about June 3, 2022, for effluent violations of excessive concentrations of Zinc based upon the analytical results of samples collected by the District and Cody Metal in March 2022

- bb) Amended C&D No. 96690, referenced as EA No. 96914, issued on or about June 8, 2022, for effluent violations of excessive concentrations of Zinc based upon the analytical results of samples collected by the District in April 2022
- cc) Amended C&D No. 96690, referenced as EA No. 97012, issued on or about July 19, 2022, for effluent violations of excessive concentrations of Zinc based upon the analytical results of samples collected by the District in May 2022
- dd) C&D No. 97086 issued on or about August 23, 2022, for effluent violations of excessive concentrations of Zinc based upon the analytical results of samples collected by the District in June 2022
- ee) Amended C&D No. 97086, referenced as EA No. 97188, issued on or about September 21, 2022, for effluent violations of excessive concentrations of Zinc based upon the analytical results of samples collected by the District in July 2022
- ff) Amended C&D No. 97086, referenced as EA No. 97297, issued on or about October 26, 2022, for effluent violations of excessive concentrations of Zinc based upon the analytical results of samples collected by the District in August 2022
- gg) Amended C&D No. 97086, referenced as EA No. 97311, issued on or about October 28, 2022, for effluent violations of excessive concentrations of Zinc based upon the analytical results of samples collected by the District in September 2022
- hh) Amended C&D No. 97086, referenced as EA No. 97436, issued on or about December 16, 2022, for effluent violations of excessive concentrations of Zinc based upon the analytical results of samples collected by the District in October 2022
- ii) Amended C&D No. 97086, referenced as EA No. 97485, issued on or about January 26, 2023, for effluent violations of excessive concentrations of Zinc based upon the analytical results of samples collected by the District in November 2022

12. Additional sampling and testing of the Facility's process wastewater occurring after the District filed the Show Cause Complaint has resulted in the issuance of the following C&Ds and amended C&Ds:

- a) C&D No. 97486 issued on or about February 8, 2023, for effluent violations of excessive concentrations of Zinc based upon the analytical results of samples collected by the District in November 2022

- b) Amended C&D No. 97486, referenced as EA No. 97533, issued on or about February 22, 2023, for effluent violations of excessive concentrations of Zinc based upon the analytical results of samples collected by the District in December 2022
- c) Amended C&D No. 97486, referenced as EA No. 97624, issued on or about March 29, 2023, for effluent violations of excessive concentrations of Zinc based upon the analytical results of samples collected by the District in January 2023
- d) Amended C&D No. 97486, referenced as EA No. 97689, issued on or about April 18, 2023, for effluent violations of excessive concentrations of Zinc based upon the analytical results of samples collected by the District in February 2023
- e) Amended C&D No. 97486, referenced as EA No. 97756, issued on or about May 17, 2023, for effluent violations of excessive concentrations of Zinc based upon the analytical results of samples collected by the District in March 2023

13. Each of the effluent violations for Zinc referenced in Paragraphs I(C)(11) and (12) above was based upon samples of process wastewater taken from the Facility's sampling point by the District and/or Cody Metal, and subsequently tested in an accredited lab.

14. Cody Metal does not dispute, nor contest, the analytical results memorialized in each C&D and amended C&D attached to the Show Cause Complaint and each C&D and amended C&D stated in Paragraph I(C)(12) above indicating that the Facility's discharged process wastewater did in each instance exceed the DA's daily maximum effluent limit for Zinc of 2.51 mg/L where indicated and its monthly average effluent limit for Zinc of 1.42 mg/L where indicated.

II. HEARING OFFICER'S FINDINGS AND ORDERS

Hearing Officer Gool has jurisdiction over the subject matter herein and over the Parties, and having considered the stipulated facts set forth above and being otherwise fully advised in the premises, finds the following relief appropriate.

IT IS HEREBY ORDERED, ADJUDGED, AND DECREED:

A. Payment of Civil Penalties and Outstanding User Charges, Noncompliance Enforcement Charges, and Late Filing Fees

1. Subject to Board approval of the Agreed Order and pursuant to Article VI, Sections 3(e) and 5 of the SWCO, Cody Metal shall pay \$50,000.00 to the District in satisfaction of all civil penalties sought by the District in these proceedings for the SWCO violations listed above. Nothing contained in this Paragraph shall excuse, diminish or offset any amounts owed by Cody Metal, whether currently or in the future, for assessed User Charges (including penalties and interest), Noncompliance Enforcement Charges, and/or Late Filing Fees.

2. Payment of the \$50,000.00 shall be made no later than ninety (90) calendar days after the date that the Agreed Order is approved by the Board (“Date of Board Approval”).

3. Cody Metal shall also pay all outstanding User Charges (including penalties and interest), Noncompliance Enforcement Charges, and Late Filing Fees, currently in the total amount of \$35,812.17¹, on or before the Date of Board Approval.

4. Payment can be submitted by one of the following methods:

a) Via paper checks mailed to:

MWRD
PO Box 95089
Chicago, IL 60694-5089

b) Online through the following link:

<https://mwrld.org/form/user-charge-payment?fnm=&lnm=&email=&dtl=>

¹ This amount also includes an amendment to C&D No. 97486, referenced as EA No. 97903, in the process of being served by the District, and C&D No. 97955, expected to be issued by the District in July 2023 to Cody Metal for Zinc violations occurring in May 2023.

c) Direct ACH

Bank Name: BMO Harris Bank NA

ABA Routing #: 0710 0028 8

Account Title: Metropolitan Water Reclamation District of Greater Chicago

Account Subtitle: Lockbox

Account #: 3306719

B. Compliance Period

5. Cody Metal shall exercise all due diligence in performing necessary upgrades to the Facility's pretreatment system, including installing a new filter press and hiring a professional consultant Accu-Labs, Inc. to supply chemicals and oversee the Facility's wastewater treatment system's upgrades until the upgrades are completed.

6. Cody Metal shall have a full-time designated person possessing a valid IEPA Class K Operators License onsite during regular business hours who will provide direct and active field supervision of all pretreatment facilities to ensure they are functioning properly and that all necessary chemicals are being supplied. Additional Cody Metal staff shall be trained on the operation of the Facility's wastewater treatment system for operational redundancy during Cody Metal's regular business hours.

7. Cody Metal shall complete all upgrades to the Facility's pretreatment system no later than ninety (90) calendar days following the Date of Board Approval and provide the District with monthly progress reports during this compliance period due on the first Friday of each month clearly showing the milestones achieved in the pretreatment system upgrades with an ultimate objective of bringing Cody Metal into compliance with the SWCO.

8. Cody Metal shall sample and test its process wastewater in accordance with the SWCO's standards and frequency, and submit all the samples/results to the District for review, including during this Compliance Period. Nothing in this Paragraph shall limit or restrict in any

way the District's right to sample and test the Facility's process wastewater consistent with the SWCO.

9. Should the analytical results of sampling and testing performed by either party or both after the Date of Board Approval but before the Compliance Period lapses show any discharge of Facility process wastewater exceeding the DA's daily maximum effluent limit for Zinc of 2.51 mg/L or its monthly average effluent limit for Zinc of 1.42 mg/L or any DA effluent limit exceedance resulting in the issuance by the District of a C&D or amended C&D, Cody Metal shall promptly pay to the District the assessed Noncompliance Enforcement Charge, which is currently \$10,000.00 for each newly issued C&D (Recurring) and \$500.00 for each Amendment to a C&D under the SWCO. For purposes of this Paragraph, promptly means no later than 30 days after the date of issuance of each such C&D.

10. Cody Metal shall provide District staff with access to the Facility upon request during regular business hours for purposes of inspecting the Facility's process wastewater and pretreatment facilities and determining compliance with the Agreed Order.

C. Post-Compliance Period Effluent Violations

11. After the Compliance Period has lapsed, should the analytical results of sampling and testing performed by either party or both show any discharge of Facility process wastewater exceeding the DA's daily maximum effluent limit for Zinc of 2.51 mg/L or its monthly average effluent limit for Zinc of 1.42 mg/L or any DA effluent limit exceedance resulting in the issuance by the District of a C&D or amended C&D, Cody Metal shall promptly pay to the District: a) the assessed Noncompliance Enforcement Charge, which is currently \$10,000.00 for each newly issued C&D (Recurring) and \$500.00 for each Amendment to a C&D under the SWCO; and b) a civil penalty in the amount of \$2,000.00 for each documented day of effluent violation(s), with a

regulatory multiple day average that exceeds acceptable limits constituting a separate day of offense. For purposes of this Paragraph, promptly means no later than 30 days after the date of issuance of each such C&D or Amended C&D.

D. Board Review and Approval of the Agreed Order

12. In the event that the Board does not approve the Agreed Order, the District shall promptly file a motion to reinstate the Show Cause Complaint, which shall include a date agreed to by the Parties for the Formal Show Cause Hearing, with proper notice to Cody Metal. Upon reinstatement and approval of such new date by Hearing Officer Gool, the District shall promptly file and serve a Notice of Formal Show Cause Hearing specifying the date of the hearing. Nothing in this Agreed Order shall constitute an admission or statement against interest by either Party in the event the Board does not approve this Agreed Order.

13. In the event that the Board approves the Agreed Order, it will automatically become a binding and enforceable final order, with Hearing Officer Gool, or her successor, retaining jurisdiction of this matter to consider any motion by any party for the purposes of enforcing the terms of this Agreed Order.

E. Reinstatement after Board Approval of the Agreed Order

14. Hearing Officer Gool, or her successor, shall retain jurisdiction to enforce the terms of the Agreed Order for a period of two (2) years following the Date of Board Approval.

15. During such time, the District shall have leave to reinstate this case for the limited purpose of seeking to revoke the DA in the event that: a) Cody Metal fails to pay the \$50,000.00 in civil penalties and/or the outstanding User Charges (including penalties and interest), Noncompliance Enforcement Charges, and Late Filing Fees in the time period provided in Paragraph II(A) above; and/or b) after the Compliance Period has lapsed, any Facility discharge

exceeds the DA's daily maximum effluent limit for Zinc of 2.51 mg/L or its monthly average effluent limit for Zinc of 1.42 mg/L or any DA effluent limit.

16. In the event this case is reinstated as provided above, Cody Metal waives all rights to contest the underlying effluent violations memorialized in each C&D and amended C&D attached to the Show Cause Complaint and each C&D and amended C&D stated in Paragraph I(C)(12) above indicating that the Facility's discharged process wastewater did in each instance exceed the DA's daily maximum effluent limit for Zinc of 2.51 mg/L where indicated and its monthly average effluent limit for Zinc of 1.42 mg/L where indicated.

17. Reinstatement of this case shall under no circumstances excuse Cody Metal from performing all of its obligations under the Agreed Order, including payment of \$50,000.00 in civil penalties, the outstanding User Charges (including penalties and interest), Noncompliance Enforcement Charges, and Late Filing Fees in the time period provided in Paragraph II(A) above, the Noncompliance Enforcement Charges provided in Paragraph II(B)(9) and the Noncompliance Enforcement Charges and civil penalties provided in Paragraph II(C)(11) above.

18. Cody Metal shall have leave to file a motion to contest any sampling and testing data from the District that form the basis of any effluent violation resulting in the imposition of any new Noncompliance Enforcement Charges and/or civil penalties assessed by the District pursuant to Paragraphs II(B)(9) and II(C)(11) above. There is a rebuttable presumption that such data is valid and accurately reflects the effluent violations detected. No legal challenge of any effluent violation will be considered, and is forever waived, unless the motion to contest is filed with the District's Clerk within fourteen (14) days of Cody Metal's receipt of written notice of the violation from the District, whether by issuance of a C&D, Amended C&D, or other written notice from the District.

F. Anticipated Sale of Cody Metal

19. It is anticipated that an entity named Corduroy Finishing, LLC (“Corduroy”) will be purchasing and operating Cody Metal’s business at the Facility and requesting transfer of the DA. Corduroy, or any other entity purchasing Cody Metal’s business and seeking transfer of the DA, will have leave to intervene in these proceedings upon filing a motion with the District’s Clerk with proper notice to the parties of record requesting to be added as a party respondent and being granted such leave by Hearing Officer Gool, or her successor, for such good cause shown. Upon being granted leave to intervene, said entity will be subject to the terms and conditions of the Agreed Order to the same extent as Cody Metal. Cody Metal shall provide written notice to the District of any such sale within five (5) business days of closing. Any request to transfer the DA shall be administered solely by the District in accordance with the SWCO.

G. Notice and Submittals

20. Except for payments, service of any notice or other documentation as required or otherwise provided under the Agreed Order shall be upon the following designated representatives by First Class U.S. Mail and by email if an email address is provided below:

As to the District:

Christopher M. Murray
Head Assistant Attorney
Metropolitan Water Reclamation District of Greater Chicago
100 East Erie Street, 3rd Floor
Chicago, IL 60611
Murrayc@mwrld.org

As to Cody Metal:

Stephen Obert, President
1620 North Throop Street
Chicago, IL 60622
steveobert@msn.com

cc: David L. Rieser
Of Counsel
K&L Gates LLP
70 West Madison Street
Suite 3300
Chicago, IL 60602
david.rieser@klgates.com

H. Failure to Insist on Performance Shall Not Constitute Waiver

21. In the event that the District fails to insist on the performance or partial performance by Cody Metal of any act or requirement contained in the Agreed Order, it shall not constitute a waiver by the District of any kind, nor shall it release Cody Metal from its duty to satisfy all present and future obligations arising under the Agreed Order in their entirety. Any such instance shall be construed strictly in the District's favor and shall not estop the District from enforcing any provisions of the Agreed Order. Cody Metal agrees that if it violates any terms of the Agreed Order, no waiver by the District of its right to take advantage of such violation shall constitute a waiver of any other obligations under the Agreed Order.

I. Execution of the Agreed Order

22. The Agreed Order may be executed by the Parties and Hearing Officer Gool in one or more counterparts, all of which taken together shall constitute the same instrument. The Agreed Order may also be executed and accepted by facsimile signature and any such signature shall be of the same force and effect as an original signature. The undersigned representatives for each of the Parties certify that they are fully authorized by the party whom they represent to enter into the terms and conditions of the Agreed Order and to legally bind them to it.

WHEREFORE, the Parties, by their undersigned representatives, enter into this Agreed Order of Settlement and submit it to Hearing Officer Gool so that it may be signed by her, then submitted to the District's Board of Commissioners for approval.

AGREED BY:

Complainant METROPOLITAN WATER RECLAMATION DISTRICT OF GREATER CHICAGO, a body corporate and politic

By: Susan T. Morakalis /ema
Susan T. Morakalis, General Counsel

DATE: JULY 3, 2023

Respondent CODY METAL FINISHING, INC., an Illinois corporation

By: _____
Stephen Obert, President

DATE: _____

Approved By: _____
David L. Rieser, Esq.

DATE: _____

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AGREED BY:

Complainant METROPOLITAN WATER RECLAMATION DISTRICT OF GREATER CHICAGO, a body corporate and politic

By: _____
Susan T. Morakalis, General Counsel

DATE: _____

Respondent CODY METAL FINISHING, INC., an Illinois corporation

By:  _____
Stephen Obert, President

DATE: 6-3-23 _____

Approved By: _____
David L. Rieser, Esq.

DATE: _____

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AGREED BY:

Complainant METROPOLITAN WATER RECLAMATION DISTRICT OF GREATER CHICAGO, a body corporate and politic

By: _____
Susan T. Morakalis, General Counsel

DATE: _____

Respondent CODY METAL FINISHING, INC., an Illinois corporation

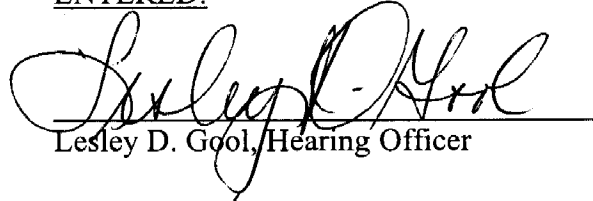
By: _____
Stephen Obert, President

DATE: _____

Approved By: /s/ David L. Rieser
David L. Rieser, Esq.

DATE: July 3, 2023

ENTERED:


Lesley D. Gool, Hearing Officer

DATE: 7/5/2023

Susan T. Morakalis, General Counsel
Christopher M. Murray/Kevin H. Yim
100 East Erie Street, 3rd Floor
Chicago, Illinois 60611
Phone: 312-751-6569 (Direct)
Attorney Code: 28138
morakaliss@mwr.org; murrayc@mwr.org; yimk@mwr.org