

**IN THE CIRCUIT COURT FOR COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT; CHANCERY DIVISION**

PEOPLE OF THE STATE OF ILLINOIS,)	
<i>ex rel.</i> KWAME RAOUL,)	
Attorney General of the State of Illinois,)	
)	
Plaintiff,)	
)	
v.)	No. 2022CH07878
)	
NEWLY WEDS FOODS, INC.,)	
a Delaware corporation,)	
)	
Defendant.)	

CONSENT ORDER

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, NEWLY WEDS FOODS, INC., a Delaware corporation, (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.* (2020), the provisions of CAAPP Permit 00050031 (as defined below) and the provisions of Original Construction Permit 20110029 (as defined below), alleged in the First Amended Complaint (as defined below), as well as the Additional Violations set forth in Section I.C. below, 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 August 12, 2022, a Complaint for Injunctive Relief and Civil Penalties (the “Original 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) (2020), against Newly Weds Foods, Inc., a Delaware corporation (“Defendant”). On November 21, 2022, with Court approval, Plaintiff filed a First Amended Complaint for Injunctive Relief and Civil Penalties 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) (2020), against Defendant (the “First Amended Complaint”).

2. The Illinois EPA is an administrative agency of the State of Illinois, created pursuant to Section 4 of the Act, 415 ILCS 5/4 (2020).

3. At all times relevant to the Original Complaint and the First Amended Complaint, Defendant was and is a Delaware corporation qualified to transact business in the State of Illinois and registered with the Illinois Secretary of State’s Office as a foreign corporation in good standing.

4. At all times relevant to the Original Complaint and the First Amended Complaint, Defendant has operated, and continues to operate, a bakery located at or around 4140 West Fullerton Avenue, Chicago, Cook County, Illinois (“Facility”).

5. As of the date of the filing of the Original Complaint and the First Amended Complaint, the Facility was located, and continues to be located, in an area of Environmental Justice (“EJ”) concern as identified using Illinois EPA EJ Start.

6. On June 29, 2020, Illinois EPA issued “Revised” Clean Air Act Permit Program (CAAPP) Permit No. 00050031 (“CAAPP Permit 00050031”) to Defendant for its operation of the Facility, which includes production and emission limits for Defendant’s JBC Line 3.

7. On November 22, 2021, Illinois EPA issued Construction Permit No. 20110029 to Defendant for the construction of the new American Bread Crumb line and the two new Japanese Bread Crumb lines at the Facility (“Original Construction Permit 20110029”).

8. On January 31, 2023, Illinois EPA issued a “Construction Permit – Revised” to Defendant to construct emission source(s) and/or air pollution control equipment consisting of an American Bread Crumb Line and two Japanese Bread Crumb Lines, and changes to the existing Japanese Bread Crumb Line, at the Facility (“Revised Construction Permit 20110029”).

B. Allegations of Non-Compliance

Plaintiff contends that Defendant has violated the following provisions of the Act, CAAPP Permit 00050031, and Original Construction Permit 20110029:

Count I: **Exceedances of Annual Volatile Organic Material Emissions Limit** in violation of Section 39.5(6)(a) of the Act, 415 ILCS 5/39.5(6)(a) (2020), and Condition 4.3.2(c)(i)(B) of CAAPP Permit 00050031.

Count II: **Exceedances of Baked Goods Production Limits** in violation of Section 39.5(6)(a) of the Act, 415 ILCS 5/39.5(6)(a) (2020), and Condition 4.3.2(e)(i)(A) of CAAPP Permit 00050031.

Count III: **Failure to Timely Submit Deviation Reports Between October 2020 and April 2021** in violation of Section 39.5(6)(a) of the Act, 415 ILCS 5/39.5(6)(a) (2020), and Conditions 4.3.5(a)(i)(A) and (B) of CAAPP Permit 00050031.

- Count IV: **Failure to Timely Submit Semiannual Monitoring Reports** in violation of Section 39.5(6)(a) of the Act, 415 ILCS 5/39.5(6)(a) (2020), and Condition 3.5(b) of CAAPP Permit 00050031.
- Count V: **Failure to Timely Conduct Emissions Testing** in violation of Section 39.5(6)(a) of the Act, 415 ILCS 5/39.5(6)(a) (2020), and Condition 1.4(a)(i) of Original Construction Permit 20110029.
- Count VI: **Failure to Timely Submit Deviation Reports in 2022** in violation of Section 39.5(6)(a) of the Act, 415 ILCS 5/39.5(6)(a) (2020), Conditions 4.3.5(a)(i)(A) and (B) of CAAPP Permit 00050031, and Condition 1.7 of Original Construction Permit 20110029.

C. Defendant's Additional Violations.

1. Through its deviation reports dated October 26, 2022, November 30, 2022, and December 21, 2022, Defendant notified Illinois EPA of its violation of the organic material emission limitation, work practice requirement, and throughput limitation provisions of Conditions 2.1.2, 2.1.3, 2.2.2, and 2.2.4 of Original Construction Permit 20110029 for the period of April 2022 thru November 2022, thereby also violating Section 39.5(6)(a) of the Act, 415 ILCS 5/39.5(6)(a) (2020).

2. Through its Semiannual Monitoring Report dated January 31, 2023 and its deviation report dated February 28, 2023, Defendant notified Illinois EPA of its pre-January 31, 2023 violation of the pressure monitoring device requirement set forth in Condition 2.2.3.a.i.C. of Original Construction Permit 20110029, and its post-January 31, 2023 violation of the pressure monitoring device requirement set forth in Conditions 2.1.3.a.i.C and 2.2.3.a.i.C of Revised Construction Permit 20110029, thereby also violating Section 39.5(6)(a) of the Act, 415 ILCS 5/39.5(6)(a) (2020).

3. Through its deviation report dated March 30, 2023, Defendant notified Illinois EPA of its violation of the monitoring requirement for the pressure monitoring device set forth in

Conditions 2.1.5.c.i and 2.2.5.c.i of the Revised Construction Permit 2011029, thereby also violating Section 39.5(6)(a) of the Act, 415 ILCS 5/39.5(6)(a) (2020).

D. Non-Admission of Violations

Defendant 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, Defendant does not affirmatively admit the allegations of violation within the First Amended Complaint and the Additional Violations set forth in Section I.C. above, and this Consent Order shall not be interpreted as including such admission.

E. Compliance Activities to Date

1. On April 2, 2021, Defendant submitted a construction permit application to Illinois EPA for a new American Bread Crumb line and two new Japanese Bread Crumb lines at the Facility. On October 22, 2021, Defendant submitted a construction permit application to Illinois EPA for higher production limits for the JBC Line 3, the new American Bread Crumb line, and the two new Japanese Bread Crumb lines. On November 22, 2021, Illinois EPA issued Original Construction Permit 20110029 to Defendant for the Facility.

2. On August 2, 2022, Defendant submitted to Illinois EPA its (a) Revised Construction Permit Application for a Proposed Project at a Clean Air Act Permit Program (CAAPP) Source to allow Defendant to increase production on the American Breadcrumb Line and three Japanese Breadcrumb Lines as well as install a new oxidizer for Japanese Breadcrumb Line 3 and connect all four dryers to the oxidizers, and (b) Revised Construction Permit Application for a Proposed Project at a Clean Air Act Permit Program (CAAPP) Source to allow Defendant to connect the oven from the American Breadcrumb Line to the existing oxidizer, so as

to achieve compliance with Conditions 4.3.2(c)(i)(B) and 4.3.2(e)(i)(A) of CAAPP Permit 00050031.

3. On January 31, 2023, Illinois EPA issued Revised Construction Permit 20110029 to Defendant for the Facility.

II. APPLICABILITY

1. This Consent Order shall apply to and be binding upon the Parties to the Consent Order. Defendant 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 Defendant in any subsequent enforcement action or permit proceeding as proof of a past adjudication of violation of the Act, CAAPP Permit 00050031 provisions, and Original Construction Permit 20110029 provisions for all violations alleged in the First Amended Complaint in this matter, as well as the Additional Violations alleged in Section I.C. above, for purposes of Sections 39 and 42 of the Act, 415 ILCS 5/39 and 42 (2020).

2. Defendant 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, Defendant 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 Defendant under this Consent Order. In the event that Defendant proposes to sell or transfer any real property or operations subject to this Consent Order, Defendant 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. Defendant shall make as a condition of any such sale or transfer, that the purchaser or successor provide to Defendant site access and all cooperation necessary for Defendant to perform to completion any compliance obligation(s) required by this Consent Order. Defendant shall provide a copy of this Consent Order to any such successor in interest and Defendant shall continue to be bound by and remain liable for performance of all obligations under this Consent Order. In appropriate circumstances, however, Defendant 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, Defendant. This provision does not relieve Defendant 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. Defendant shall pay a civil penalty of Seven Hundred and Fifty-Five Thousand Dollars (\$755,000.00). 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 Defendant fails to complete any activity or fails to comply with any response or reporting requirement by the date specified in this Consent Order, Defendant 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 Defendant for its noncompliance with this Consent Order. However, failure by the Plaintiff to make this demand shall not relieve Defendant of the obligation to pay stipulated penalties. All stipulated penalties shall be payable within thirty (30) calendar days of the date Defendant knows or should have known of its noncompliance with any provision of this Consent Order.

2. If Defendant fails to make any payment required by this Consent Order on or before the date upon which the payment is due, Defendant shall be in default and the remaining unpaid balance of the penalty, plus any accrued interest, shall be due and owing immediately. In the event

of default, the Plaintiff shall be entitled to reasonable costs of collection, including reasonable attorney's fees.

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

4. 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:

Kathryn A. Pamerter
Senior Assistant Attorney General
Environmental Bureau
Illinois Attorney General's Office
69 W. Washington Street, Suite 1800
Chicago, Illinois 60602

D. Future Compliance

1. Commencing on the date of the entry of this Consent Order, Defendant shall comply with (a) CAAPP Permit 00050031 issued on June 29, 2020, as may be modified or revised from to time, and (b) Revised Construction Permit 20110029 that Illinois EPA issued on January 31, 2023, for the Facility, including any timelines set forth therein. In addition:

- a. After Defendant completes construction in accordance with Revised Construction Permit 20110029, Defendant shall conduct emissions testing to demonstrate compliance with permitted emission limits. Defendant shall perform such testing in accordance with the provisions of such permit, the applicable test methods, Title 35 of the Illinois Administrative Code, and an Illinois EPA-approved test protocol and schedule for testing.
- b. If the results of testing performed pursuant to Section III.D.1.a. above do not demonstrate compliance with permitted emission limits, Defendant shall develop, and submit to Illinois EPA, a construction permit application corresponding to a new revised control system for the Facility's American Breadcrumb Line and Japanese Breadcrumb Lines, pursuant to a timeline and other requirements established by Illinois EPA.

2. Within sixty (60) days of the date of the entry of this Consent Order, Defendant shall (a) install a pressure monitoring device at the Facility, as required in Conditions 2.1.3.a.i.C and 2.2.3.a.i.C of Revised Construction Permit 20110029, and (b) submit to Illinois EPA written documentation regarding the completion of such installation that also demonstrates how the Facility's pressure monitoring device complies with the 0.007" water column (WC) criteria of USEPA Method 204.

3. The Illinois EPA, its employees and representatives, and the Attorney General, his employees and representatives, shall have the right of entry into and upon Defendant's Facility 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.

4. This Consent Order in no way affects the responsibilities of Defendant to comply with any other federal, state or local laws or regulations, including but not limited to the Act and the Illinois Pollution Control Board regulations.

5. Defendant shall cease and desist from future violations of the Act, CAAPP Permit 00050031 provisions, Original Construction Permit 20110029 provisions and Revised Construction Permit 20110029 that were the subject matter of the First Amended Complaint and the Additional Violations set forth in Section I.C. above.

E. *Force Majeure*

1. *Force majeure* is an event arising solely beyond the control of Defendant, 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 Defendant. An increase in costs associated with implementing any requirement of this Consent Order shall not, by itself, excuse Defendant 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, Defendant shall orally notify the Illinois EPA (Kent Mohr, Compliance Manager, 217-782-5544) 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 Defendant 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 Defendant'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 Defendant and that Defendant 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. Defendant shall not be liable for stipulated penalties for the period of any such stipulated extension.

4. If the Plaintiff does not accept Defendant's claim of a *force majeure* event, Defendant 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 Defendant. If this Court determines that the delay or impediment to performance has been or will be caused by circumstances solely beyond the control of Defendant and that Defendant could not have prevented the delay by the exercise of due diligence, Defendant 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. Defendant 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 Defendant 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 Defendant 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 Defendant's receipt of the written summary of the Plaintiff's position, Defendant 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 Defendant'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, Defendant'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

Kathryn A. Pamenter
Senior Assistant Attorney General
Environmental Bureau
Illinois Attorney General's Office
69 W. Washington Street, Suite 1800
Chicago, Illinois 60602

Maureen Wozniak
Acting Deputy General Counsel, Division of Legal Counsel
Illinois Environmental Protection Agency
1021 North Grand Avenue East
P.O. Box 19276
Springfield, Illinois 62794-9276

As to Defendant

Elizabeth S. Harvey
Swanson, Martin & Bell, LLP
330 N. Wabash Ave., Suite 3300
Chicago, IL 60611

Timothy Whelan
Vice President and General Counsel
Newly Weds Foods, Inc.
4140 W. Fullerton Ave.
Chicago, IL 60639

I. Release from Liability

In consideration of Defendant's payment of a \$755,000.00 penalty, its commitment to cease and desist as contained in Section III.D.5. above, and completion of all activities required hereunder, the Plaintiff releases, waives and discharges Defendant from any further liability or penalties for the violations of the Act, CAAPP Permit 00050031 provisions, Original Construction

Permit 20110029 provisions and Revised Construction Permit 20110029 provision that were the subject matter of the First Amended Complaint and the Additional Violations set forth in Section I.C. above. The release set forth herein does not extend to any matters other than those expressly specified in Plaintiff's First Amended Complaint filed on November 21, 2022, and the Additional Violations set forth in Section I.C. above. The Plaintiff reserves, and this Consent Order is without prejudice to, all rights of the State of Illinois against Defendant 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. Defendant'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 Defendant.

J. 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.

[Remainder of Page Blank; Text Continues on Page 17]

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:

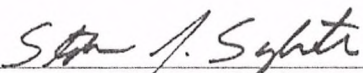
FOR THE PLAINTIFF:

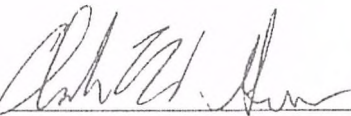
PEOPLE OF THE STATE OF ILLINOIS
ex rel. KWAME RAOUL, Attorney General
of the State of Illinois

ILLINOIS ENVIRONMENTAL
PROTECTION AGENCY

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

JOHN J. KIM, Director
Illinois Environmental Protection Agency

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

BY: 
CHARLES W. GUNNARSON
Chief Legal Counsel

DATE: 8/31/23

DATE: 8/29/23

FOR DEFENDANT:

NEWLY WEDS FOODS, INC.

BY: _____

Its: _____

DATE: _____

ENTERED:

JUDGE

DATE: _____

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

ILLINOIS ENVIRONMENTAL
PROTECTION AGENCY

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

JOHN J. KIM, Director
Illinois Environmental Protection Agency

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

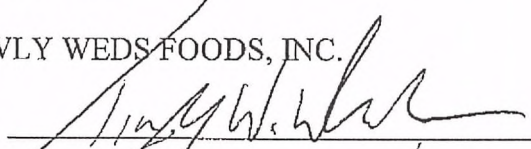
BY: _____
CHARLES W. GUNNARSON
Chief Legal Counsel

DATE: _____

DATE: _____

FOR DEFENDANT:

NEWLY WEDS FOODS, INC.

BY: 

Its: Vice President & General

DATE: 8/30/2023 Counsel

ENTERED:

Judge Joel Chupack

SEP 05 2023

Circuit Court - 2227

JUDGE

DATE: September 5, 2023