

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

ILLINOIS ENVIRONMENTAL)
PROTECTION AGENCY,)
)
Complainant,)
)
v.)
)
GERALD CAIN and REYNOLDS)
SERVICE CO., INC.,)
)
Respondents.)

AC 14-37
(IEPA No. 41-14-AC)

RECEIVED
CLERK'S OFFICE

APR 11 2014

STATE OF ILLINOIS
Pollution Control Board

NOTICE OF FILING

 ORIGINAL

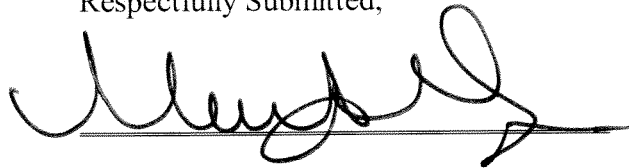
To: Allen W. James, Esq.
137 W. Vienna Street
Suite 1A
Anna, IL 62906

Gerald Cain
127 Turner Avenue
Anna, IL 62906

Collin Cain
8355 State Route 146W
Jonesboro, IL 62952

PLEASE TAKE NOTICE that on this date I electronically filed with the Clerk of the Pollution Control Board of the State of Illinois the following instrument(s) entitled MOTION TO WITHDRAW ADMINISTRATIVE CITATION.

Respectfully Submitted,



Michelle M. Ryan
Assistant Counsel

Illinois Environmental Protection Agency
1021 North Grand Avenue East
P.O. Box 19276
Springfield, Illinois 62794-9276
(217) 782-5544

Dated: April 7, 2014

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

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STATE OF ILLINOIS
Pollution Control Board

ILLINOIS ENVIRONMENTAL)
PROTECTION AGENCY,)
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Complainant,) AC 14-37
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v.) (IEPA No. 41-14-AC)
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GERALD CAIN and REYNOLDS)
SERVICE CO., INC.,)
)
Respondents.)

COMPLAINANT'S MOTION TO WITHDRAW ADMINISTRATIVE CITATION

NOW COMES the Complainant, the Illinois Environmental Protection Agency ("Illinois EPA"), by and through its attorney, Assistant Counsel Michelle M. Ryan, pursuant to 35 Ill. Adm. Code 101.500, and respectfully states as follows:

- (1) On February 11, 2014, Illinois EPA issued an Administrative Citation to Respondents, Gerald Cain and Reynolds Service Co., Inc., based on an inspection conducted on January 3, 2014.
- (2) On March 26, 2014, Complainant filed a Motion to Withdraw Administrative Citation as to Respondent Reynolds Service Co., Inc.
- (3) Based upon facts and circumstances discovered since the filing of the Administrative Citation, Illinois EPA has determined that it is prudent to withdraw this Administrative Citation as to the remaining Respondent, Gerald Cain, at this time.

WHEREFORE, the Illinois Environmental Protection Agency requests that the Board dismiss the pending action against all Respondents.

ILLINOIS ENVIRONMENTAL
PROTECTION AGENCY,
Complainant

DATED: April 7, 2014

A handwritten signature in black ink, appearing to read "Michelle M. Ryan", written over a horizontal line.

Michelle M. Ryan
Assistant Counsel

Illinois Environmental Protection Agency
1021 North Grand Avenue East
P.O. Box 19276
Springfield, Illinois 62794-9276
(217) 782-5544

PROOF OF SERVICE

I hereby certify that I did on the 7th day of April, 2014, send by U.S. Mail with postage thereon fully prepaid, by depositing in a United States Post Office Box a true and correct copy of the following instrument(s) entitled MOTION TO WITHDRAW ADMINISTRATIVE CITATION

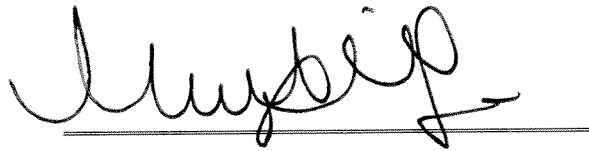
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Gerald Cain
127 Turner Avenue
Anna, IL 62906

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STATE OF ILLINOIS
Pollution Control Board

and the original and nine (9) copies of the same foregoing instrument on the same date

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



Michelle M. Ryan
Assistant Counsel

Illinois Environmental Protection Agency
1021 North Grand Avenue East
P.O. Box 19276
Springfield, Illinois 62794-9276
(217) 782-5544