

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

ADMINISTRATIVE CITATION

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY,)	
)	
Complainant,)	AC 2023-
)	
v.)	(IEPA No. 56-23-AC)
)	
ROBERT C. CROWDER TRUST, MARY E. MCCLELLAND TRUST, and MAX MCCLELLAND)	
)	
Respondents.)	

NOTICE OF FILING

**To: Illinois Environmental Protection Agency Division of Legal Counsel
Attn: Michelle Ryan
1021 North Grand Avenue East
P.O. Box 19276
Springfield, Illinois 62794-9276**

PLEASE TAKE NOTICE that I have today filed with the Office of the Clerk of the Pollution Control Board the following documents entitled PETITION FOR REVIEW and NOTICE OF FILING and NOTICE OF APPEARANCE and CERTIFICATE OF SERVICE of ROBERT C. CROWDER TRUST and MARY E. MCCLELLAND TRUST and MAX MCCLELLAND a copy of which is herewith served upon you.

Respectfully Submitted,

ROBERT C. CROWDER TRUST, MARY E. MCCLELLAND TRUST, and MAX MCCLELLAND, Respondents

By: RAMMELKAMP BRADNEY, P.C., attorneys

By: 
Joseph A. Hughs, Counsel

Attorneys for Respondents:

Rammelkamp Bradney, P.C.
Joseph A. Hughs, Of Counsel (#6343379)
232 West State Street, P. O. Box 550
Jacksonville, IL 62651-0550
Telephone: (217) 245-6177
Fax: (217) 243-7322
Email: jhughs@rbawyers.net

Dated: May 30, 2023

PROOF OF SERVICE

The undersigned certifies that the foregoing instrument was served upon all parties to the above cause to each of the attorneys of record herein at their respective addresses disclosed on the pleadings on May 30, 2023, by:

U.S Mail (*certified*) FAX
 Hand Delivered Overnight Courier
 Federal Express Other:

Signature: *Walter J. Parton*

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)	
v.)	(IEPA No. 56-23-AC)
)	
ROBERT C. CROWDER TRUST, MARY)	
E. MCCLELLAND TRUST, and MAX)	
MCCLELLAND)	
)	
Respondents.)	

NOTICE OF APPEARANCE

I hereby file my appearance in this proceeding on behalf of ROBERT C. CROWDER TRUST, MARY E. MCCLELLAND TRUST, and MAX MCCLELLAND.

Respectfully Submitted,

ROBERT C. CROWDER TRUST, MARY E. MCCLELLAND TRUST, and MAX MCCLELLAND, Respondents

By: RAMMELKAMP BRADNEY, P.C., attorneys

By:  _____
Joseph A. Hughs, Counsel

Attorneys for Respondents:
Rammelkamp Bradney, P.C.
Joseph A. Hughs, Of Counsel (#6343379)
232 West State Street, P. O. Box 550
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Signature: W. J. Parter

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Complainant,)	AC 2023-
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)	
Respondents.)	

PETITION FOR REVIEW

COMES NOW Respondents, by and through the undersigned attorneys, and for Respondent's Petition for Review, states as follows:

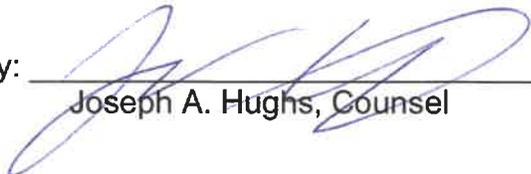
1. Administrative Citation number IEPA No. 56-23-AC was served upon Respondents on or about June 12, 2019.
2. The alleged violation was the result of uncontrollable circumstances.

WHEREFORE, Respondents respectfully request a hearing to review the Administrative Citation and for such other relief as the Hearing Officer deems just and proper.

Respectfully Submitted,

ROBERT C. CROWDER TRUST, MARY E. MCCLELLAND TRUST, and MAX MCCLELLAND, Respondents

By: RAMMELKAMP BRADNEY, P.C., attorneys

By: 

 Joseph A. Hughs, Counsel

Attorneys for Respondents:

Rammelkamp Bradney, P.C.
Joseph A. Hughs, Of Counsel (#6343379)
232 West State Street, P. O. Box 550
Jacksonville, IL 62651-0550
Telephone: (217) 245-6177
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Email: jhughs@rbawyers.net

Dated: May 30, 2023

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<input checked="" type="checkbox"/>	U.S Mail <i>(certified)</i>	<input type="checkbox"/>	FAX
<input type="checkbox"/>	Hand Delivered	<input type="checkbox"/>	Overnight Courier
<input type="checkbox"/>	Federal Express	<input type="checkbox"/>	Other:

Signature: 

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)	
Respondents.)	

CERTIFICATE OF SERVICE

COMES NOW Respondents, by and through the undersigned attorney, and for this Certificate of Service, states as follows:

I, the undersigned, certify that I have served on this 30th day of May, 2023 the attached NOTICE OF FILING, PETITION FOR REVIEW, and NOTICE OF APPEARANCE upon:

Illinois Environmental Protection Agency Division of Legal Counsel
Attn: Michelle Ryan
1021 North Grand Avenue East
P.O. Box 19276
Springfield, Illinois 62794-9276

by delivering said documents to the US Postal Service to be sent via certified mail, with proper postage or delivery charges prepaid.

Respectfully Submitted,

ROBERT C. CROWDER TRUST, MARY E. MCCLELLAND TRUST, and MAX MCCLELLAND, Respondents

By: RAMMELKAMP BRADNEY, P.C., attorneys

By: 
Joseph A. Hughs, Counsel

Attorneys for Respondents:
Rammelkamp Bradney, P.C.
Joseph A. Hughs, Of Counsel (#6343379)
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Signature: 