



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

RECEIVED
CLERK'S OFFICE

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276, 217-782-3397
JAMES R. THOMPSON CENTER, 100 WEST RANDOLPH, SUITE 11-300, CHICAGO, IL 60601, 312-814-6026

ROD R. BLAGOJEVICH, GOVERNOR

RENEE CIPRIANO, DIRECTOR

STATE OF ILLINOIS
Pollution Control Board

(217) 782-9817
TDD: (217) 782-9143

AC04-83

June 3, 2004

The Honorable Dorothy Gunn, Clerk
Illinois Pollution Control Board
James R. Thompson Center
100 West Randolph Street, Suite 11-500
Chicago, Illinois 60601

Re: Illinois Environmental Protection Agency v. Giuffre II, LLC and Reload, Inc.
IEPA File No. 273-04-AC; 2010355004—Winnebago County

Dear Clerk Gunn:

Enclosed for filing with the Illinois Pollution Control Board, please find the original and nine true and correct copies of the Administrative Citation Package, consisting of the Administrative Citation, the inspector's Affidavit, and the inspector's Illinois Environmental Protection Agency Open Dump Inspection Checklist, issued to the above-referenced respondent(s).

On this date, a copy of the Administrative Citation Package was sent to the Respondent(s) via Certified Mail. As soon as I receive the return receipt, I will promptly file a copy with you, so that the Illinois Pollution Control Board may calculate the thirty-five (35) day appeal period for purposes of entering a default judgment in the event the Respondent(s) fails or elects not to file a petition for review contesting the Administrative Citation.

If you have any questions or concerns, please do not hesitate to contact me at the number above.
Thank you for your cooperation.

Sincerely,

Michelle M. Ryan
Assistant Counsel

Enclosures

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

RECEIVED
CLERK'S OFFICE

ADMINISTRATIVE CITATION

JUN 07 2004

STATE OF ILLINOIS
Pollution Control Board

ILLINOIS ENVIRONMENTAL
PROTECTION AGENCY,

Complainant,

v.

GIUFFRE II, LLC and RELOAD, INC.,

Respondents.

AC

0483

(IEPA No. 273-04-AC)

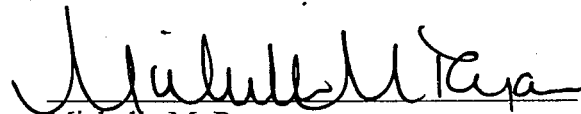
NOTICE OF FILING

To: Giuffre II, LLC
C T Corporation System
208 So LaSalle St.- Suite 814
Chicago, Illinois 60604

RELOAD, Inc.
Phillip A. Penner, President
615 South Main St.
Rockford, Illinois 61105

PLEASE TAKE NOTICE that on this date I mailed for filing with the Clerk of the Pollution Control Board of the State of Illinois the following instrument(s) entitled ADMINISTRATIVE CITATION, AFFIDAVIT, and OPEN DUMP INSPECTION CHECKLIST.

Respectfully submitted,



Michelle M. Ryan
Special Assistant Attorney General

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

Dated: June 3, 2004

JUN 07 2004

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

ILLINOIS ENVIRONMENTAL
PROTECTION AGENCY,

Complainant,

V.

GIUFFRÉ II, LLC and RELOAD, INC.,

Respondents.

AC

(IEPA No. 273-04-AC)

This Administrative Citation is issued pursuant to the authority vested in the Illinois Environmental Protection Agency by Section 31.1 of the Illinois Environmental Protection Act, 415 ILCS 5/31.1 (2002).

1. That Giuffre II, LLC is the present owner and RELOAD, Inc. is the present operator (collectively "Respondents") of a facility located at 1165 Prairie Hill Road in Rockton, Winnebago County, Illinois. The property is commonly known to the Illinois Environmental Protection Agency as Rockton/RELOAD (former Beloit Corporation Property).

2. That said facility is an open dump operating without an Illinois Environmental Protection Agency Operating Permit and is designated with Site Code No. 2010355004.

3. That Respondents have owned and/or operated said facility at all times pertinent hereto.

4. That on April 22, 2004, Jason Thorp of the Illinois Environmental Protection Agency's Rockford Regional Office inspected the above-described facility. A copy of his inspection report setting forth the results of said inspection is attached hereto and made a part hereof.

VIOLATIONS

Based upon direct observations made by Jason Thorp during the course of his April 22, 2004 inspection of the above-named facility, the Illinois Environmental Protection Agency has determined that Respondents have violated the Illinois Environmental Protection Act (hereinafter, the "Act") as follows:

- (1) That Respondents caused or allowed the open dumping of waste in a manner resulting in litter, a violation of Section 21(p)(1) of the Act, 415 ILCS 5/21(p)(1) (2002).
- (2) That Respondents caused or allowed the open dumping of waste in a manner resulting in deposition of general construction or demolition debris or clean construction or demolition debris, a violation of Section 21(p)(7) of the Act, 415 ILCS 5/21(p)(7) (2002).

CIVIL PENALTY

Pursuant to Section 42(b)(4-5) of the Act, 415 ILCS 5/42(b)(4-5) (2002), Respondents are subject to a civil penalty of One Thousand Five Hundred Dollars (\$1,500.00) for each of the violations identified above, for a total of Three Thousand Dollars (\$3,000.00). If Respondents elect not to petition the Illinois Pollution Control Board, the statutory civil penalty specified above shall be due and payable no later than June 30, 2004, unless otherwise provided by order of the Illinois Pollution Control Board.

If Respondents elect to contest this Administrative Citation by petitioning the Illinois Pollution Control Board in accordance with Section 31.1 of the Act, 415 ILCS 5/31.1 (2002), and if the Illinois Pollution Control Board issues a finding of violation as alleged herein, after an adjudicatory hearing, Respondents shall be assessed the associated hearing costs incurred by the Illinois Environmental

Protection Agency and the Illinois Pollution Control Board. Those hearing costs shall be assessed in addition to the One Thousand Five Hundred Dollar (\$1,500.00) statutory civil penalty for each violation.

Pursuant to Section 31.1(d)(1) of the Act, 415 ILCS 5/31.1(d)(1) (2002), if Respondents fail to petition or elects not to petition the Illinois Pollution Control Board for review of this Administrative Citation within thirty-five (35) days of the date of service, the Illinois Pollution Control Board shall adopt a final order, which shall include this Administrative Citation and findings of violation as alleged herein, and shall impose the statutory civil penalty specified above.

When payment is made, Respondent's check shall be made payable to the Illinois Environmental Protection Trust Fund and mailed to the attention of Fiscal Services, Illinois Environmental Protection Agency, 1021 North Grand Avenue East, P.O. Box 19276, Springfield, Illinois 62794-9276. Along with payment, Respondents shall complete and return the enclosed Remittance Form to ensure proper documentation of payment.

If any civil penalty and/or hearing costs are not paid within the time prescribed by order of the Illinois Pollution Control Board, interest on said penalty and/or hearing costs shall be assessed against the Respondents from the date payment is due up to and including the date that payment is received. The Office of the Illinois Attorney General may be requested to initiate proceedings against Respondents in Circuit Court to collect said penalty and/or hearing costs, plus any interest accrued.

PROCEDURE FOR CONTESTING THIS
ADMINISTRATIVE CITATION

Respondents have the right to contest this Administrative Citation pursuant to and in accordance with Section 31.1 of the Act, 415 ILCS 5/31/1 (2002). If Respondents elect to contest this Administrative Citation, then Respondents shall file a signed Petition for Review, including a Notice of Filing, Certificate of Service, and Notice of Appearance, with the Clerk of the Illinois Pollution Control Board, State of Illinois Center, 100 West Randolph, Suite 11-500, Chicago, Illinois 60601. A copy of said Petition for Review shall be filed with the Illinois Environmental Protection Agency's Division of Legal Counsel at 1021 North Grand Avenue East, P.O. Box 19276, Springfield, Illinois 62794-9276. Section 31.1 of the Act provides that any Petition for Review shall be filed within thirty-five (35) days of the date of service of this Administrative Citation or the Illinois Pollution Control Board shall enter a default judgment against the Respondents.

Renee Cipriano
Renee Cipriano, Director *by wcc*
Illinois Environmental Protection Agency

Date: 5/3/04

Prepared by: Susan E. Konzelmann, Legal Assistant
Division of Legal Counsel
Illinois Environmental Protection Agency
1021 North Grand Avenue East
P.O. Box 19276
Springfield, Illinois 62794-9276
(217) 782-5544

REMITTANCE FORM

ILLINOIS ENVIRONMENTAL
PROTECTION AGENCY,

Complainant,

V.

GIUFFRE II, LLC and RELOAD, INC.,

Respondents.

AC

(IEPA No. 273-04-AC)

FACILITY: Rockton/RELOAD, Inc.
(former Beloit Corp. Property)

SITE CODE NO.: 2010355004

COUNTY: Winnebago

CIVIL PENALTY: \$3,000.00

DATE OF INSPECTION: April 22, 2004

DATE REMITTED:

SS/FEIN NUMBER:

SIGNATURE:

NOTE

Please enter the date of your remittance, your Social Security number (SS) if an individual or Federal Employer Identification Number (FEIN) if a corporation, and sign this Remittance Form. Be sure your check is enclosed and mail, along with Remittance Form, to Illinois Environmental Protection Agency, Attn.: Fiscal Services, P.O. Box 19276, Springfield, Illinois 62794-9276.

AFFIDAVIT

IEPA DOCKET NO.

"OFFICIAL SEAL"
TERESA LABUNSKI
Notary Public, State of Illinois
My Commission Expires 1/10/2007

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

Open Dump Inspection Checklist

County: Winnebago LPC#: 2010355004 Region: 1 - Rockford
 Location/Site Name: Rockton / RELOAD Inc.-Mallory Properties
 Date: 04/22/2004 Time: From 10:00AM To 10:45am Previous Inspection Date: 12/11/2003
 Inspector(s): Thorp/Retzlaff Weather: 45°F, Overcast, Wind E/10mph
 No. of Photos Taken: # 13 Est. Amt. of Waste: 400 yds³ Samples Taken: Yes # No ☒
 Interviewed: Mike Salek Complaint #: C-04-065R

Responsible Party
 Mailing Address(es)
 and Phone
 Number(s):

RELOAD Inc.
 1165 Prairie Hill Road
 Rockton, IL 61072
 Attn: Mike Salek
 (815) 389-1959

Mallory Properties
 445 West Oklahoma Avenue
 Milwaukee, WI 53207
 Attn: Andrew Bandy
 (414) 747-7400

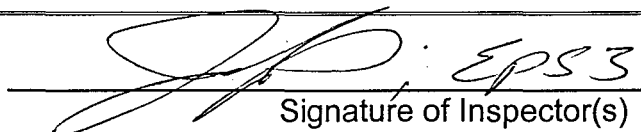
RECEIVED
 MAY 24 2004

	SECTION	DESCRIPTION	VIOL
ILLINOIS ENVIRONMENTAL PROTECTION ACT REQUIREMENTS			
1.	9(a)	CAUSE, THREATEN OR ALLOW AIR POLLUTION IN ILLINOIS	<input type="checkbox"/>
2.	9(c)	CAUSE OR ALLOW OPEN BURNING	<input type="checkbox"/>
3.	12(a)	CAUSE, THREATEN OR ALLOW WATER POLLUTION IN ILLINOIS	<input type="checkbox"/>
4.	12(d)	CREATE A WATER POLLUTION HAZARD	<input type="checkbox"/>
5.	21(a)	CAUSE OR ALLOW OPEN DUMPING	<input checked="" type="checkbox"/>
6.	21(d)	CONDUCT ANY WASTE-STORAGE, WASTE-TREATMENT, OR WASTE- DISPOSAL OPERATION:	
	(1)	Without a Permit	<input checked="" type="checkbox"/>
	(2)	In Violation of Any Regulations or Standards Adopted by the Board	<input checked="" type="checkbox"/>
7.	21(e)	DISPOSE, TREAT, STORE, OR ABANDON ANY WASTE, OR TRANSPORT ANY	<input type="checkbox"/>
8.	21(p)	CAUSE OR ALLOW THE OPEN DUMPING OF ANY WASTE IN A MANNER WHICH RESULTS	
	(1)	Litter	<input checked="" type="checkbox"/>
	(2)	Scavenging	<input type="checkbox"/>
	(3)	Open Burning	<input type="checkbox"/>
	(4)	Deposition of Waste in Standing or Flowing Waters	<input type="checkbox"/>
	(5)	Proliferation of Disease Vectors	<input type="checkbox"/>
	(6)	Standing or Flowing Liquid Discharge from the Dump Site	<input type="checkbox"/>

LPC # 2010355004

Inspection Date: 12/11/2003

	(7)	Deposition of General Construction or Demolition Debris; or Clean Construction or	<input checked="" type="checkbox"/>
9.	55(a)	NO PERSON SHALL:	
	(1)	Cause or Allow Open Dumping of Any Used or Waste Tire	<input type="checkbox"/>
	(2)	Cause or Allow Open Burning of Any Used or Waste Tire	<input type="checkbox"/>
35 ILLINOIS ADMINISTRATIVE CODE REQUIREMENTS SUBTITLE G			
10.	812.101(a)	FAILURE TO SUBMIT AN APPLICATION FOR A PERMIT TO DEVELOP AND OPERATE A LANDFILL	<input checked="" type="checkbox"/>
11.	722.111	HAZARDOUS WASTE DETERMINATION	<input type="checkbox"/>
12.	808.121	SPECIAL WASTE DETERMINATION	<input type="checkbox"/>
13.	809.302(a)	ACCEPTANCE OF SPECIAL WASTE FROM A WASTE TRANSPORTER WITHOUT A WASTE HAULING PERMIT, UNIFORM WASTE PROGRAM REGISTRATION AND PERMIT AND/OR MANIFEST	<input type="checkbox"/>
OTHER REQUIREMENTS			
14.		APPARENT VIOLATION OF: (<input type="checkbox"/>) PCB; (<input type="checkbox"/>) CIRCUIT COURT CASE NUMBER: ORDER ENTERED ON:	<input type="checkbox"/>
15.	OTHER:		<input type="checkbox"/>
			<input type="checkbox"/>
			<input type="checkbox"/>
			<input type="checkbox"/>
			<input type="checkbox"/>
			<input type="checkbox"/>


Signature of Inspector(s)

Informational Notes

1. [Illinois] Environmental Protection Act: 415 ILCS 5/4.
2. Illinois Pollution Control Board: 35 Ill. Adm. Code, Subtitle G.
3. Statutory and regulatory references herein are provided for convenience only and should not be construed as legal conclusions of the Agency or as limiting the Agency's statutory or regulatory powers. Requirements of some statutes and regulations cited are in summary format. Full text of requirements can be found in references listed in 1. and 2. above.
4. The provisions of subsection (p) of Section 21 of the [Illinois] Environmental Protection Act shall be enforceable either by administrative citation under Section 31.1 of the Act or by complaint under Section 31 of the Act.
5. This inspection was conducted in accordance with Sections 4(c) and 4(d) of the [Illinois] Environmental Protection Act: 415 ILCS 5/4(c) and (d).
6. Items marked with an "NE" were not evaluated at the time of this inspection.

2010355004 – Winnebago County
Rockton / RELOAD (a.k.a Beloit Corporation)
FOS File

NARRATIVE INSPECTION REPORT

On December 11, 2003, Jason Thorp conducted a complaint investigation at the RELOAD, Inc., property located at 1165 Prairie Hill Road in Rockton, Illinois. A complaint (C-04-065R) regarding the subject facility was received by the Illinois EPA's Rockford Field Office on December 03, 2003. The complainant alleged the open dumping of debris into an on-site gravel pit. The subject facility is situated on a portion of property also known as the Beloit Corporation NPL Site, which is now owned by Mallory Properties. Agency correspondence relating to this complaint investigation will be directed to the owner and operator of the property as follows:

Owner

Mallory Properties
445 W. Oklahoma
Milwaukee, WI 53207
Attn: Andrew Bandy

Operator

RELOAD, Inc.
1165 Prairie Hill Road
Rockton, IL 61072
Attn: Mike Salek

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MAY 24 2004

IEPA-DLPC

Jason Thorp arrived at the entrance to the subject gravel pit at 0900 hours. A call was placed to the respondent, RELOAD, Inc., to discuss the complaint allegations and gain access to the subject gravel pit. Mr. Thorp was connected with RELOAD, Inc. General Manager, Mike Salek. Mr. Salek was informed of the complaint allegations and agreed to meet Mr. Thorp at the subject gravel pit. At 0915 hours Mr. Thorp and Mr. Salek entered the subject gravel pit. Digital photographs 2010355004~12112003-001 through -004 depict solid waste piles of sheetrock, wood and scrap metal located within the subject gravel pit. Mr. Salek indicated that RELOAD, Inc. was responsible for the placement of sheetrock within the subject gravel pit. According to Mr. Salek, the sheetrock is received by RELOAD, Inc. as dunnage from the sheetrock manufacturer. During initial operations at RELOAD, Inc. this sheetrock dunnage was placed into roll-off boxes and properly disposed of at a permitted facility. At a later date, Mr. Salek believed the sheetrock was composed of natural materials and could be placed within the subject gravel pit. He was informed that sheetrock did not meet the definition of clean fill. The majority of solid waste disposed of within the subject gravel pit consists of sheetrock. Mr. Salek pointed out the area of sheetrock disposal which measures approximately 150yd³. The complaint investigation concluded at 0945hours and Mr. Thorp departed from the site. The following solid waste violations were cited during the complaint investigation: 21(a), 21(d)(1), 21(d)(2), 21(p)(1) and 21(p)(7) of the Environmental Protection Act and 812.101(a) of the Illinois Administrative Code.

On December 22, 2003, Mr. Thorp contacted Mallory Properties to apprise them of the complaint details and informed them of their responsibilities to remove and properly dispose of the waste in the event RELOAD, Inc. does not comply. A voice message was left for Andrew Bandy regarding the aforementioned.

On December 23, 2003, an ACWN was sent out to RELOAD, Inc. (Operator) and Mallory Properties (Owner) via certified mail. The ACWN was received by RELOAD, Inc. and Mallory Properties on December 26, 2003 and December 29, 2003, respectively. Both respondents were given 90 days from the date of the ACWN to comply with the corrective actions set forth within the ACWN.

On January 13, 2004, a written response was received from RELOAD, Inc. representative Mike Salek (General Manager). The written response was reviewed by Jason Thorp, Dave Retzlaff and Paul Jagiello and determined to be inadequate, as it did not address the removal of the waste. No response was ever received from Mallory Properties. A decision was made to re-inspect the subject gravel pit and issue an AC to RELOAD, Inc. and Mallory Properties.

On April 22, 2004, Jason Thorp and Dave Retzlaff arrived on-site at 1000 hours to conduct a re-inspection of the subject gravel pit. Prior to the re-inspection, Mike Salek had requested a meeting to discuss the regulations and the possibility of leaving the sheetrock in the gravel pit as an inert waste. Mr. Salek was informed he would be responsible for making the inert waste determination and complying with the regulations for operating an inert waste landfill. He was also provided with a list of accredited laboratories and appropriate analytical methodology for making an inert waste determination. He was advised that he would still be subject to the AC process regardless of the inert waste determination results. At the conclusion of the meeting Mr. Salek accompanied Mr. Thorp and Mr. Retzlaff to the subject gravel pit. Upon entering the subject gravel pit, Mr. Thorp observed an additional volume of sheetrock had been deposited since the initial inspection. The current estimated volume of solid waste is 400yd³. Digital photographs 2010355004-04222004-001 through -015 depict solid waste piles of sheetrock, wood and scrap metal located within the subject gravel pit. The re-inspection concluded at 1045 hours. The following solid waste violations were cited during the complaint investigation: 21(a), 21(d)(1), 21(d)(2), 21(p)(1) and 21(p)(7) of the Environmental Protection Act and 812.101(a) of the Illinois Administrative Code.

2010355004 – Winnebago County
Rockton / Reload (Mallory Properties)
FOS

DIGITAL PHOTOGRAPHS

DATE:
04222004

TIME:
1024

DIRECTION:
Southeast

PHOTO by:
Jason Thorp

PHOTO FILE NAME:
2010355004~04222004-001

COMMENTS:

Photo taken towards the disposal of
sheetrock within the on-site gravel
pit.



DATE:
04222004

TIME:
1025

DIRECTION:
Southeast

PHOTO by:
Jason Thorp

PHOTO FILE NAME:
2010355004~04222004-002

COMMENTS:

Photo taken towards the disposal of
sheetrock within the on-site gravel
pit.



2010355004 – Winnebago County
Rockton / Reload (Mallory Properties)
FOS

DIGITAL PHOTOGRAPHS

DATE:

04222004

TIME:

1025

DIRECTION:

Northeast

PHOTO by:

Jason Thorp

PHOTO FILE NAME:

2010355004~04222004-003

COMMENTS:

Photo taken towards the disposal of sheetrock within the on-site gravel pit.



DATE:

04222004

TIME:

1025

DIRECTION:

Northeast

PHOTO by:

Jason Thorp

PHOTO FILE NAME:

2010355004~04222004-004

COMMENTS:

Photo taken towards the disposal of sheetrock within the on-site gravel pit.



2010355004 – Winnebago County
Rockton / Reload (Mallory Properties)
FOS

DIGITAL PHOTOGRAPHS

DATE:

04222004

TIME:

1027

DIRECTION:

Northwest

PHOTO by:

Jason Thorp

PHOTO FILE NAME:

2010355004~04222004-005

COMMENTS:

Photo taken towards the disposal of sheetrock within the on-site gravel pit.



DATE:

04222004

TIME:

1027

DIRECTION:

Northwest

PHOTO by:

Jason Thorp

PHOTO FILE NAME:

2010355004~04222004-006

COMMENTS:

Photo taken towards the disposal of sheetrock within the on-site gravel pit.



2010355004 – Winnebago County
Rockton / Reload (Mallory Properties)
FOS

DIGITAL PHOTOGRAPHS

DATE:

04222004

TIME:

1028

DIRECTION:

West

PHOTO by:

Jason Thorp

PHOTO FILE NAME:

2010355004~04222004-007

COMMENTS:

Photo taken towards the disposal of
sheetrock within the on-site gravel
pit.



DATE:

04222004

TIME:

1028

DIRECTION:

West

PHOTO by:

Jason Thorp

PHOTO FILE NAME:

2010355004~04222004-008

COMMENTS:

Photo taken towards the disposal of
sheetrock within the on-site gravel
pit.



2010355004 – Winnebago County
Rockton / Reload (Mallory Properties)
FOS

DIGITAL PHOTOGRAPHS

DATE:

04222004

TIME:

1029

DIRECTION:

East

PHOTO by:

Jason Thorp

PHOTO FILE NAME:

2010355004~04222004-009

COMMENTS:

Photo taken towards the disposal of
wood debris and scrap metal within
the on-site gravel pit.



DATE:

04222004

TIME:

1032

DIRECTION:

Southwest

PHOTO by:

Jason Thorp

PHOTO FILE NAME:

2010355004~04222004-010

COMMENTS:

Photo taken towards the disposal of
sheetrock within the on-site gravel
pit.



2010355004 – Winnebago County
Rockton / Reload (Mallory Properties)
FOS

DIGITAL PHOTOGRAPHS

DATE:

04222004

TIME:

1032

DIRECTION:

Southwest

PHOTO by:

Jason Thorp

PHOTO FILE NAME:

2010355004~04222004-011

COMMENTS:

Photo taken towards the disposal of sheetrock within the on-site gravel pit.



DATE:

04222004

TIME:

1033

DIRECTION:

East

PHOTO by:

Jason Thorp

PHOTO FILE NAME:

2010355004~04222004-012

COMMENTS:

Photo taken towards the disposal of sheetrock within the on-site gravel pit.



2010355004 – Winnebago County
Rockton / Reload (Mallory Properties)
FOS

DIGITAL PHOTOGRAPHS

DATE:

04222004

TIME:

1034

DIRECTION:

East

PHOTO by:

Jason Thorp

PHOTO FILE NAME:

2010355004~04222004-013

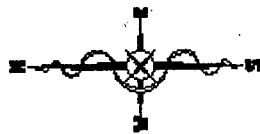
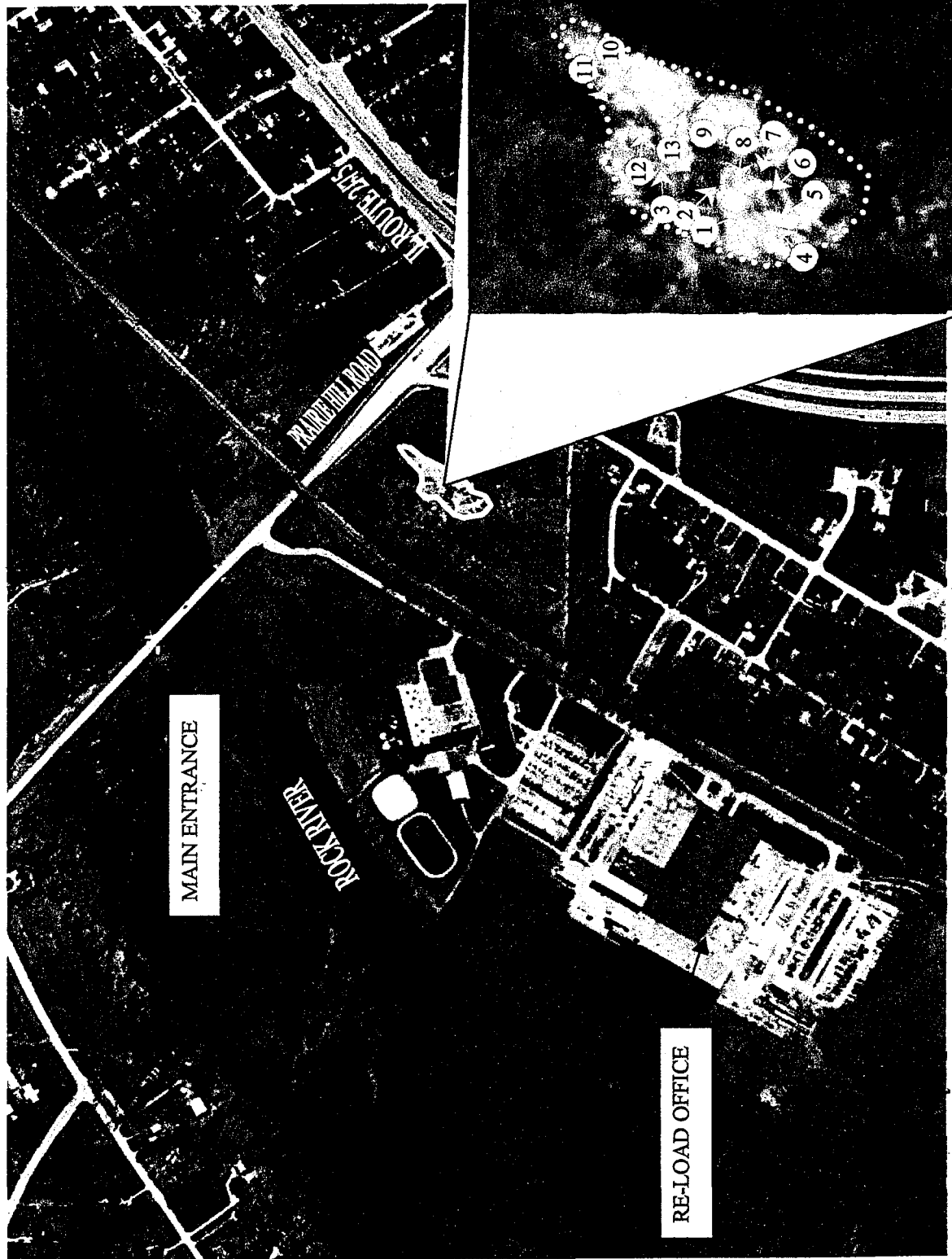
COMMENTS:

Photo taken towards the disposal of
sheetrock, wood debris, scrap metal
and tires within the on-site gravel
pit.



Site Map

(features plotted on USGS aerial photograph, 14 April 1998)



2010355004 / Winnebago County
 Rockton - Reload/Mallory Properties
 FOS

KEY

Gravel Pit

Photograph # & Direction



PROOF OF SERVICE

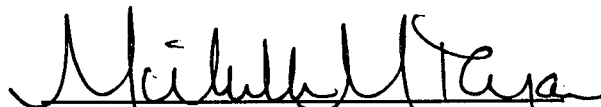
I hereby certify that I did on the 3rd day of June 2004, send by Certified Mail, Return Receipt Requested, with postage thereon fully prepaid, by depositing in a United States Post Office Box a true and correct copy of the following instrument(s) entitled ADMINISTRATIVE CITATION, AFFIDAVIT, and OPEN DUMP INSPECTION CHECKLIST

To: Giuffre II, LLC
C T Corporation System
208 So LaSalle St.- Suite 814
Chicago, Illinois 60604

RELOAD, Inc.
Phillip A. Penner, President
615 South Main St.
Rockford, Illinois 61105

and the original and nine (9) true and correct copies of the same foregoing instruments on the same date by Certified Mail, Return Receipt Requested, with postage thereon fully prepaid

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



Michelle M. Ryan
Special Assistant Attorney General

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