

OCT 12 2004

STATE OF ILLINOIS
Pollution Control Board

PEOPLE OF THE STATE OF ILLINOIS)
)
Complainant,)
)
vs.)
)
COMMUNITY LANDFILL COMPANY,)
INC., an Illinois corporation, and the CITY OF)
MORRIS, an Illinois municipal corporation,)
)
Respondents.)

Case No. PCB No. 03-191

NOTICE OF FILING

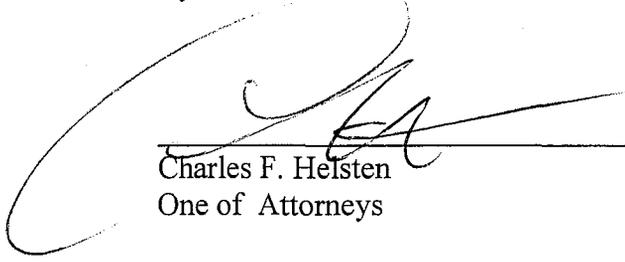
Please take notice that on October 6, 2004 we have served upon the Complainant, People of the State of Illinois, the Supplemental Response of City of Morris to the Complainant's First Set of Interrogatories.

Dated October 6, 2004

Respectfully Submitted,

On behalf of the CITY OF MORRIS

By: Hinshaw & Culbertson LLP



Charles F. Helsten
One of Attorneys

HINSHAW & CULBERTSON LLP
100 Park Avenue
P.O. Box 1389
Rockford, IL 61105-1389
815-490-4900

the City, all such premium notices were sent on by the City of Morris to Community Landfill Company, with a demand upon Community Landfill Company to pay all such premiums.

INTERROGATORY NO. 8: As noted in the City's further answer to Interrogatory No. 7 above, to the best knowledge, information and belief of the City of Morris, Community Landfill Company did all premium amounts due on all premium notices which were issued by Frontier Insurance Company. Copies of all such premium notices had been previously supplied by the City to the State in response to the State's Request for Production of Documents. As such, and although at various times, closure/post closure coverage was obtained in the name of the City for the benefit of CLC, since (to the best knowledge, information and belief of the City of Morris) Community Landfill Corporation was paying or making arrangements for payment of all such premiums as they came due, no documents or files were ever maintained in the City Clerk's office on premium payments.

INTERROGATORY NO. 10: Attached hereto are several pages of the City's most recent annual audit concerning various bond payments. The I-80 Water Tower Bond was paid off in early 2002. The interest rates on those bonds varied from 4.9%-5.4% per annum. The Municipal Compliance Plan Sewer Bonds issued in 1994 will be paid off by December 1, 2004. The interest rate on those bonds ranges from 3%-4.65% per annum. These are the only outstanding bond obligations of the City within the time period designated by the State in its discovery requests.

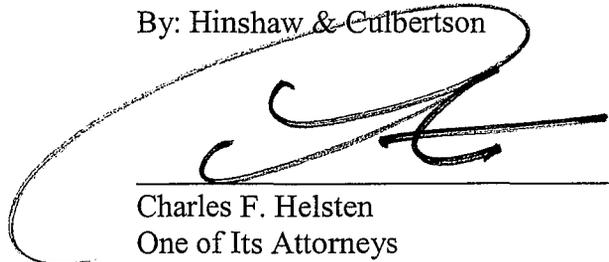
Dated: 10/6/04

Respectfully Submitted,

On behalf of the CITY OF MORRIS, an Illinois
Municipal Corporation

By: Hinshaw & Culbertson

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100 Park Avenue
P.O. Box 1389
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Charles F. Helsten
One of Its Attorneys

AFFIDAVIT OF SERVICE

The undersigned, pursuant to the provisions of Section 1-109 of the Illinois Code of Civil Procedure, hereby under penalty of perjury under the laws of the United States of America, certifies that on October 6, 2004, she served a copy of the foregoing upon:

Mr. Christopher Grant
Assistant Attorney General
Environmental Bureau
188 W. Randolph St., 20th Fl.
Chicago, IL 60601

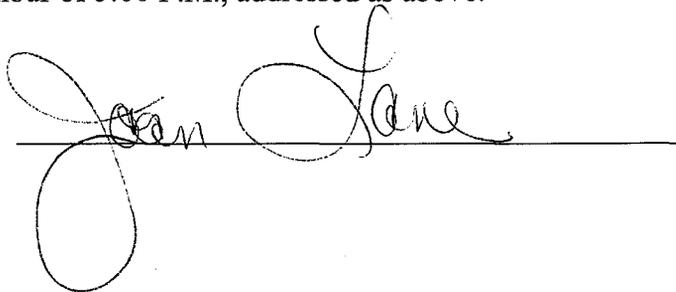
Scott Belt
Scott Belt and Associates, PC
105 E. Main Street, Suite 206
Morris, IL 60450

Clarrisa Grayson
Mark LaRose
LaRose & Bosco, Ltd.
200 N. LaSalle Street, Suite 2810
Chicago, IL 60601

Ms. Dorothy Gunn, Clerk
Pollution Control Board
100 W. Randolph, Suite 11-500
Chicago, IL 60601

Bradley Halloran
Hearing Officer
Pollution Control Board
100 W. Randolph, Suite 11
Chicago, IL 60601

By depositing a copy thereof, enclosed in an envelope in the United States Mail at Rockford, Illinois, proper postage prepaid, before the hour of 5:00 P.M., addressed as above.

A handwritten signature in cursive script, appearing to read "Jean Lane", is written over a horizontal line. The signature is fluid and somewhat stylized.

HINSHAW & CULBERTSON
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