



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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

DOUGLAS P. SCOTT, DIRECTOR

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

ORIGINAL

AC09-6

July 25, 2008

RECEIVED  
CLERK'S OFFICE

JUL 28 2008

STATE OF ILLINOIS  
Pollution Control Board

John Therriault, 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. Euwell & Phyllis Beers and Jeremy Beers  
IEPA File No. 137-08-AC: 1998535007—Williamson County

Dear Mr. Therriault:

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  
ADMINISTRATIVE CITATION

**RECEIVED**  
CLERK'S OFFICE  
JUL 28 2008  
STATE OF ILLINOIS  
Pollution Control Board

ILLINOIS ENVIRONMENTAL )  
PROTECTION AGENCY, )  
 )  
Complainant, )  
 )  
v. )  
 )  
EUWELL & PHYLLIS BEERS and )  
JEREMY BEERS, )  
 )  
Respondents. )

AC *09-16*  
(IEPA No. 137-08-AC)

ORIGINAL

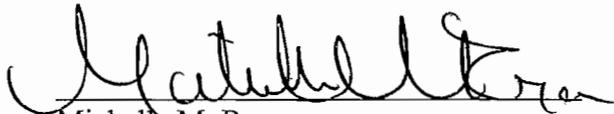
**NOTICE OF FILING**

To: Euwell & Phyllis Beers  
3825 48<sup>th</sup> Ave. N  
St. Petersburg, FL 33714

Jeremy Beers  
15281 Lighthouse Road  
Pittsburg, IL 62974

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  
Assistant Counsel

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

Dated: July 25, 2008



## VIOLATIONS

Based upon direct observations made by Phillip Fatka during the course of his June 19, 2008 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) (2006).
  
- (2) That Respondents caused or allowed the open dumping of waste in a manner resulting in open burning, a violation of Section 21(p)(3) of the Act, 415 ILCS 5/21(p)(3)(2006).
  
- (3) 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) (2006).

## CIVIL PENALTY

Pursuant to Section 42(b)(4-5) of the Act, 415 ILCS 5/42(b)(4-5) (2006), 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 Four Thousand Five Hundred Dollars (\$4,500.00). 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 September 1, 2008, 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 (2006), 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) (2006), if Respondents fail to petition or elect 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 (2006). 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.

  
Douglas P. Scott, Director  
Illinois Environmental Protection Agency

Date: 7/25/08

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

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JUL 28 2008

REMITTANCE FORM

STATE OF ILLINOIS  
Pollution Control Board

ILLINOIS ENVIRONMENTAL )  
PROTECTION AGENCY, )  
) )  
Complainant, ) )  
) )  
v. ) )  
) )  
EUWELL & PHYLLIS BEERS and JEREMY )  
BEERS, ) )  
) )  
) )  
Respondents. )

AC **09-6**  
(IEPA No. 137-08-AC)

FACILITY: Pittsburg/Beers, Jeremy  
COUNTY: Williamson  
DATE OF INSPECTION: June 19, 2008

SITE CODE NO.: 1998535007  
CIVIL PENALTY: \$4,500.00

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.

ORIGINAL

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD  
RECEIVED  
CLERK'S OFFICE

JUL 28 2008

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY )

Complainant, )

STATE OF ILLINOIS  
Pollution Control Board )

v. )

IEPA DOCKET NO. )

Jeremy Beers )  
1998535997 – Williamson County )  
Pittsburg/Beers, Jeremy )

AC09-6

Respondent. )

AFFIDAVIT

Affiant, Phillip Fatka, being first duly sworn, voluntarily deposes and states as follows:

1. Affiant is a field inspector employed by the Land Pollution Control Division of the Illinois Environmental Protection Agency and has been so employed at all times pertinent hereto.

2. On June 19, 2008, between 12:30pm and 1:05pm, Affiant conducted an inspection of a disposal site operated by Jeremy Beers, located in Williamson County, Illinois, and known as Pittsburg/Beers, Jeremy by the Illinois Environmental Protection Agency. Said site has been assigned site code number 1998535007 by the Agency.

3. Affiant inspected said open dumping and open burning site by an on-site inspection which included walking and photographing the site.

4. As a result of the material actions referred to in paragraph 3 above, Affiant completed the Inspection Report form attached hereto and made a part hereof, which, to the best of Affiant's knowledge and belief, is an accurate representation of Affiant's observations and factual conclusions with respect to said open dumping and open burning site.

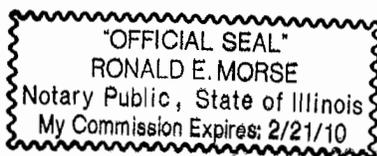
Phillip John

Subscribed and Sworn to before me

this 3<sup>rd</sup> day of July, 2008

Ronald E. Morse  
Notary Public

(Initial Block)



# ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

## Open Dump Inspection Checklist

County: Williamson LPC#: 1998535007 Region: 7 - Marion  
 Location/Site Name: Pittsburg/Beers, Jeremy  
 Date: 06/19/2008 Time: From 12:30pm To 1:05pm Previous Inspection Date: \_\_\_\_\_  
 Inspector(s): P. Fatka, Deputy McCabe Weather: ~85F, Mostly Sunny  
 No. of Photos Taken: # 14 Est. Amt. of Waste: 70 yds<sup>3</sup> Samples Taken: Yes # \_\_\_\_\_ No   
 Interviewed: Keith Lambert Complaint #: C-08-235  
 Latitude: 37.81837 Longitude: -88.80531 Collection Point Description: Dump Location -  
 (Example: Lat.: 41.26493 Long.: -89.38294) Collection Method: GPS -

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

Jeremy Beers  
 15281 Lighthouse Rd  
 Pittsburg, IL 62974

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**RECEIVED**  
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 JUL 28 2008  
 STATE OF ILLINOIS  
 Pollution Control Board

Euwell & Phyllis Beers  
 3825 48<sup>th</sup> Ave N  
 St Petersburg, FL 33714

|   | SECTION | DESCRIPTION  | VIOL                                |
|---|---------|--|-------------------------------------|
| <b>ILLINOIS ENVIRONMENTAL PROTECTION ACT REQUIREMENTS</b> |         |  |                                     |
| 1.  | 9(a)    | CAUSE, THREATEN OR ALLOW AIR POLLUTION IN ILLINOIS   | <input checked="" type="checkbox"/> |
| 2.  | 9(c)    | CAUSE OR ALLOW OPEN BURNING  | <input checked="" type="checkbox"/> |
| 3.  | 12(a)   | CAUSE, THREATEN OR ALLOW WATER POLLUTION IN ILLINOIS   | <input checked="" type="checkbox"/> |
| 4.  | 12(d)   | CREATE A WATER POLLUTION HAZARD  | <input checked="" 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 WASTE INTO THE STATE AT/TO SITES NOT MEETING REQUIREMENTS OF ACT | <input checked="" type="checkbox"/> |
| 8.  | 21(p)   | CAUSE OR ALLOW THE OPEN DUMPING OF ANY WASTE IN A MANNER WHICH RESULTS IN ANY OF THE FOLLOWING OCCURRENCES AT THE DUMP SITE:   |                                     |
|   | (1)     | Litter   | <input checked="" type="checkbox"/> |
|   | (2)     | Scavenging   | <input type="checkbox"/>            |
|   | (3)     | Open Burning   | <input checked="" 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 # 1998535007

Inspection Date: 06/19/2008

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

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.

**Illinois Environmental Protection Agency**  
**Narrative Inspection Report**

**Site #: 1998535007**

**Date: 6-19-08**

**County: Williamson**

**Inspector: P. Fatka**

**Subject: Pittsburg/Beers, Jeremy**

**Complaint #: C-08-235**

**General Remarks**

**G.P.S.: N 37.81837, W 88.80531**

**Time: 12:30pm-1:05pm**

**Volume of waste found at site: ~70 yds<sup>3</sup>**

**Owner of Property: Euwell & Phyllis Beers**

**Weather: ~85°F, Mostly Sunny**

**Soil Conditions: Normal**

This inspection was made as the result of a complaint received by this office. The site is located at 15281 Lighthouse Road northeast of Pittsburg, Illinois. The site was easily accessed by Lighthouse Road. Williamson County Sheriff's Deputy McCabe accompanied this inspector on the site inspection. This inspector knocked on the door and a Mr. Keith Lambert answered. He informed me that Mr. Beers had stepped out to visit a nearby store. I provided him my business card and asked that he pass it along to Mr. Beers. Fourteen (14) pictures were taken of the waste, which consisted of General Construction and Demolition Debris (GC/DD) and general refuse. Open burning was occurring at the site, and had also occurred in the past. Current burning was obvious due to the pit full of smoldering material. The smoke from this burning was pungent and noxious, causing this inspector's eyes to water. Past burning was evidenced by piles of ashes, charred materials, and unconsumed wastes found near the main burn pit. Additionally, the Williamson County Fire Protection District furnished an incident report generated on April 30, 2008 showing they had responded to a forest fire that had been started by a trash fire at this site. A trailer constructed of a pickup truck bed and particle board was found by the burn pit and had "Beers Hauling, 922-9321, weekly trash pickup \$12/month" painted onto it with black spray paint. This burn pit was estimated by pacing to be about 6 yards by 6 yards, and was visually estimated to be 2 yards deep at the deepest point, and was estimated to be 54 cubic yards in total volume. The ruined outbuilding contained what appeared to be 3 yards by 4 yards of material, totaling 12 cubic yards. The pile of abandoned GC/DD by the site entrance was visually estimated to be 2 yards by 2 yards for a total volume of 4 cubic yards. An inspection by Maggie Stevenson of this office on May 14, 2008 showed there are additional wastes near the mobile home found on this site, and that open burning was occurring at the time of that inspection.

The following conditions, which constitute violations, were observed:

**Illinois Environmental Protection Act Requirements:**

1. **9(a) Cause, threaten or allow air pollution in Illinois**
2. **9(c) Cause or allow open burning**
3. **12(a) Cause, threaten or allow water pollution in Illinois**
4. **12(d) Create a water pollution hazard**
5. **21(a) Cause or allow open dumping**
6. **21(d) Conduct any waste-storage, waste-treatment, or waste-disposal operation:**
  - (1) **Without a permit**
  - (2) **In violation of any regulations or standards adopted by the Board**
7. **21(e) Dispose, treat, store, or abandon any waste or transport any waste into the State at/to sites not meeting requirements of Act**
8. **21(p) Cause or allow the open dumping of any waste in a manner which results in any of the following occurrences at the dump site:**
  - (1) **Litter**
  - (3) **Open burning**
  - (7) **Deposition of general construction or demolition debris or clean construction or demolition debris**

### **35 Illinois Administrative Code Requirements Subtitle G**

9. **812.101(a) Failure to submit an application for a permit to develop and operate a landfill**

**Findings:** The deposition of waste materials directly on the ground, uncovered, and unprotected from the elements constitutes open dumping. The materials being open burned in the pit cause air pollution, and because of this pits location at the top of a drainage gully it threatens water pollution. The amount of wastes on site and the presence of a trailer that advertises a waste hauling service indicate that materials are being hauled on site for the purpose of waste disposal. There are no records of a permit being applied for by or issued to this site. The wastes being disposed of at this site are also an eyesore and thus meet the definition of litter. Finally, this site is in violation of the above mentioned regulations and standards.

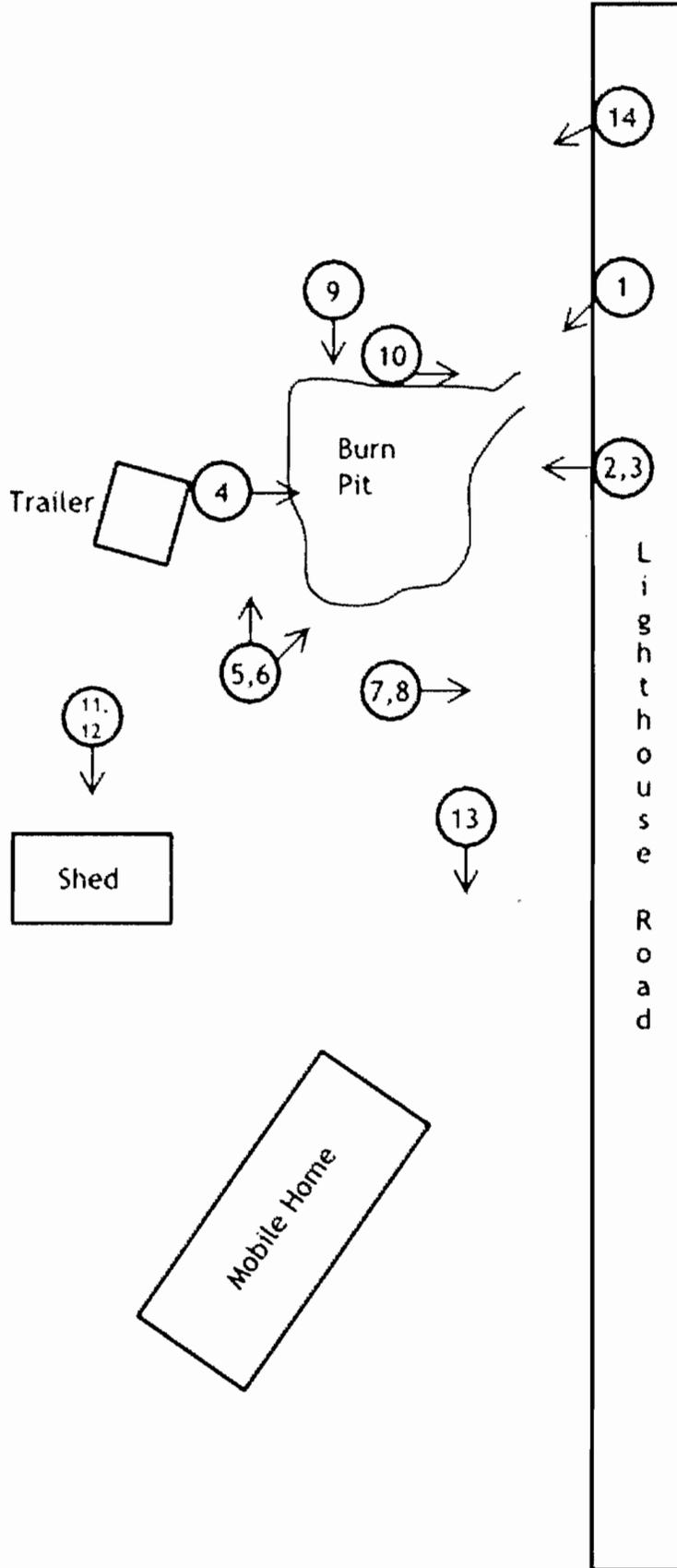
Not to scale  
All locations approximate

↑

N

⊙ → Direction and number of photo

1998535007 - Williamson County  
Pittsburg/Beers 6-19-08





## DIGITAL PHOTOGRAPHS



Date: 6-19-08  
Time: 12:32pm  
Direction: SW  
Photo by: P. Fatka  
Exposure #: 001  
Comments: View from  
the road of the smoke  
from the open burning.



Date: 6-19-08  
Time: 12:55pm  
Direction: W  
Photo by: P. Fatka  
Exposure #: 002  
Comments: A view from  
the road of smoke from  
the open burning and the  
trailer apparently used to  
haul wastes to the burn  
site. "Beers Hauling" was  
spray painted on the side  
of the trailer.

File Names: 1998535007~06192008-[Exp. #].jpg



## DIGITAL PHOTOGRAPHS



Date: 6-19-08  
Time: 12:32pm  
Direction: W  
Photo by: P. Fatka  
Exposure #: 003  
Comments: Another view  
from the road of the  
smoke from the open  
burning and the trailer.



Date: 6-19-08  
Time: 12:58pm  
Direction: E  
Photo by: P. Fatka  
Exposure #: 004  
Comments: The open  
burning pit.

File Names: 1998535007~06192008-[Exp. #].jpg



**DIGITAL PHOTOGRAPHS**



Date: 6-19-08  
Time: 12:58pm  
Direction: N  
Photo by: P. Fatka  
Exposure #: 005  
Comments: View of the open burning pit and the trailer advertising a trash hauling service.



Date: 6-19-08  
Time: 12:59pm  
Direction: NE  
Photo by: P. Fatka  
Exposure #: 006  
Comments: Ashes and other charred remnants of older burns.

File Names: 1998535007-06192008-[Exp. #].jpg



## DIGITAL PHOTOGRAPHS



Date: 6-19-08  
Time: 12:59pm  
Direction: E  
Photo by: P. Fatka  
Exposure #: 007  
Comments: Ashes and  
charred material from  
older burn.



Date: 6-19-08  
Time: 12:59pm  
Direction: E  
Photo by: P. Fatka  
Exposure #: 008  
Comments: Ashes,  
charred material, and  
unburned wastes from  
earlier burn.

File Names: 1998535007-06192008-[Exp. #].jpg



## DIGITAL PHOTOGRAPHS



Date: 6-19-08  
Time: 1:00pm  
Direction: S  
Photo by: P. Fatka  
Exposure #: 009  
Comments: Another view  
of the burn pit.



Date: 6-19-08  
Time: 1:00pm  
Direction: E  
Photo by: P. Fatka  
Exposure #: 010  
Comments: View of the  
burn pit as it empties into  
a natural drainage gully.

File Names: 1998535007~06192008-[Exp. #].jpg



## DIGITAL PHOTOGRAPHS



Date: 6-19-08  
Time: 1:00pm  
Direction: S  
Photo by: P. Fatka  
Exposure #: 011  
Comments: Ruined  
outbuilding full of wastes.



Date: 6-19-08  
Time: 1:00pm  
Direction: S  
Photo by: P. Fatka  
Exposure #: 012  
Comments: Close-up of  
wastes in the ruined  
outbuilding.

File Names: 1998535007~06192008-[Exp. #].jpg



## DIGITAL PHOTOGRAPHS



Date: 6-19-08  
Time: 1:01pm  
Direction: S  
Photo by: P. Fatka  
Exposure #: 013  
Comments: Abandoned  
general construction and  
demolition debris  
(GC/DD).



Date: 6-19-08  
Time: 1:02pm  
Direction: SW  
Photo by: P. Fatka  
Exposure #: 014  
Comments: View of the  
drainage ditch that the  
burn pit empties to.

File Names: 1998535007~06192008-[Exp. #].jpg

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JUL 28 2008

STATE OF ILLINOIS  
Pollution Control Board

**PROOF OF SERVICE**

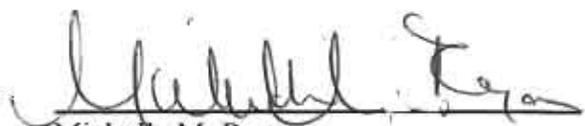
I hereby certify that I did on the 25th day of July 2008, send by Certified Mail, Return Receipt Requested, with postage thereon fully prepaid, by depositing in a United States Post Office Box a true and correct copy of the following instrument(s) entitled ADMINISTRATIVE CITATION, AFFIDAVIT, and OPEN DUMP INSPECTION CHECKLIST

To: Euwell & Phyllis Beers  
3825 48<sup>th</sup> Ave. N  
St. Petersburg, FL 33714

Jeremy Beers  
15281 Lighthouse Road  
Pittsburg, IL 62974

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: 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