

ORIGINAL

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

ADMINISTRATIVE CITATION

ILLINOIS ENVIRONMENTAL )  
 PROTECTION AGENCY, )  
 )  
 Complainant, )  
 )  
 v. )  
 )  
 REYNOLDS SERVICE CO., INC, )  
 )  
 Respondent. )

AC 09-14  
 (IEPA No. 214-08-AC)

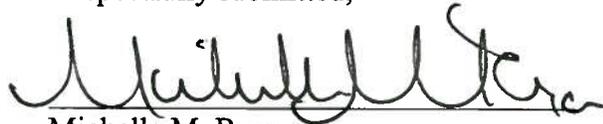
RECEIVED  
 CLERK'S OFFICE  
 SEP 11 2008  
 STATE OF ILLINOIS  
 Pollution Control Board

NOTICE OF FILING

To: Reynolds Service Co., Inc.  
 Attn: Terry Reynolds  
 2875 Route 146 West  
 P.O. Box 786  
 Jonesboro, IL 62952

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: September 9, 2008

ORIGINAL

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

ADMINISTRATIVE CITATION

ILLINOIS ENVIRONMENTAL )  
PROTECTION AGENCY, )  
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v. )  
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REYNOLDS SERVICE CO. INC., )  
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AC 09-14  
(IEPA No. 214-08-AC)

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Pollution Control Board

JURISDICTION

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 (2006).

FACTS

1. That Reynolds Service Co., Inc. ("Respondent") is the present owner and operator of a facility located at the following: Section 23, TWP 12, Rng 2W, Part of SE corner of NE NE, Union County, Illinois. The property is commonly known to the Illinois Environmental Protection Agency as Jonesboro/Reynolds Service Co., Inc.
2. That said facility is an open dump operating without an Illinois Environmental Protection Agency Operating Permit and is designated with Site Code No. 1818565001.
3. That Respondent has owned and operated said facility at all times pertinent hereto.
4. That on August 4, 2008, Sheila Williams of the Illinois Environmental Protection Agency's Marion Regional Office inspected the above-described facility. A copy of her inspection report setting forth the results of said inspection is attached hereto and made a part hereof.



## VIOLATIONS

Based upon direct observations made by Sheila Williams during the course of her August 4, 2008 inspection of the above-named facility, the Illinois Environmental Protection Agency has determined that Respondent has violated the Illinois Environmental Protection Act (hereinafter, the "Act") as follows:

- (1) That Respondent 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 Respondent caused or allowed the open dumping of waste in a manner resulting in proliferation of disease vectors, a violation of Section 21(p)(5) of the Act, 415 ILCS 5/21(p)(5) (2006).
  
- (3) That Respondent 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), Respondent is 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 Respondent elects not to petition the Illinois Pollution Control Board, the statutory civil penalty specified above shall be due and payable no later than October 15, 2008, unless otherwise provided

by order of the Illinois Pollution Control Board.

If Respondent elects 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, Respondent 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 Respondent fails 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, Respondent 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 Respondent 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 Respondent in Circuit Court to collect said penalty and/or hearing costs, plus any interest accrued.

PROCEDURE FOR CONTESTING THIS  
ADMINISTRATIVE CITATION

Respondent has 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 Respondent elects to contest this Administrative Citation, then Respondent 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 Respondent.

  
Douglas P. Scott, Director  
Illinois Environmental Protection Agency

Date: 9/9/08

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

REMITTANCE FORM

ILLINOIS ENVIRONMENTAL )  
PROTECTION AGENCY, )  
 )  
Complainant, )  
 )  
v. )  
 )  
REYNOLDS SERVICE CO. INC., )  
 )  
Respondent. )

AC 09-14  
(IEPA No. 214-08-AC)

FACILITY: Jonesboro/Reynolds Service Co., Inc. SITE CODE NO.: 1818565001  
COUNTY: Union CIVIL PENALTY: \$4,500.00  
DATE OF INSPECTION: August 4, 2008

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.

# ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

## Open Dump Inspection Checklist

County: Union                      LPC#: 1818565001                      Region: 7 - Marion  
 Location/Site Name: Jonesboro/Reynolds Service Co., Inc.  
 Date: 08/04/2008    Time: From 3:45 PM    To 4:55 PM    Previous Inspection Date: 08/23/2002  
 Inspector(s): S. Williams                      Weather: sunny, humid, ~95 F.  
 No. of Photos Taken: # 31    Est. Amt. of Waste: >2,984 yds<sup>3</sup>    Samples Taken: Yes # \_\_\_\_\_ No   
 Interviewed: Jeff Reynolds & Gladice Jones                      Complaint #: 09-007M  
 Latitude: 37.46395    Longitude: -89.28810    Collection Point Description: Site Entrance -  
 (Example: Lat.: 41.26493                      Long.: -89.38294)                      Collection Method: GPS -

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

Reynolds Service Co., Inc.  
 Attn: Terry Reynolds  
 2875 Route 146 West  
 P.O. Box 786  
 Jonesboro, IL 62952

	SECTION	DESCRIPTION	VIOL
<b>ILLINOIS ENVIRONMENTAL PROTECTION ACT REQUIREMENTS</b>			
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 checked="" 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 WASTE INTO THE STATE AT/TO SITES NOT MEETING REQUIREMENTS OF ACT AND REGULATIONS	<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 type="checkbox"/>
	(4)	Deposition of Waste in Standing or Flowing Waters	<input type="checkbox"/>
	(5)	Proliferation of Disease Vectors	<input checked="" type="checkbox"/>
	(6)	Standing or Flowing Liquid Discharge from the Dump Site	<input type="checkbox"/>

LPC # 1818565001

Inspection Date: 08/04/2008

	(7)	Deposition of: (i) General Construction or Demolition Debris as defined in Section 3.160(a); or (ii) Clean Construction or Demolition Debris as defined in Section 3.160(b)	<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 checked="" type="checkbox"/>
	(2)	Cause or Allow Open Burning of Any Used or Waste Tire	<input type="checkbox"/>
<b>35 ILLINOIS ADMINISTRATIVE CODE REQUIREMENTS 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: 807.201</b>	Subject to such exemption as expressly provided in Section 21(e) (Ill. Rev. Stat. 1981, ch. 111 1/2, par. 1021(e)) of the Act as to the requirement of obtaining a permit, no person shall cause or allow the development of any new solid waste management site or cause or allow the modification of an existing solid waste management site without a Development Permit issued by the Agency.	<input checked="" type="checkbox"/>
16.	<b>807.202a</b>	New Solid Waste Management Sites. Subject to such exemption as expressly provided in Section 21(e) of the Act (Ill. Rev. Stat. 1982, ch. 111 1/2, par. 1021(e)) as to the requirement of obtaining a permit, no person shall cause or allow the use or operation of any solid waste management site for which a Development Permit is required under Section 807.201 without an Operating Permit issued by the Agency, except for such testing operations as may be authorized by the Development Permit.	<input checked="" 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.

# **NARRATIVE INSPECTION REPORT**

Date: August 4, 2008 Inspector: Sheila Williams

Site Code: 1818565001 County: Union

Site Name: Jonesboro/Reynolds Service Co., Inc. Time: 3:45 P.M. – 4:55 P.M.

## **GENERAL REMARKS**

On August 4, 2008 I conducted an inspection at the Jonesboro/Reynolds Service Co., Inc. site as the result of a complaint. This site is located at 2875 Route 146 West Jonesboro, IL. The complainant indicated mobile homes are torn down & burned along a creek. The complainant said people in the area have asked Terry Reynolds to stop this type of operation for the last two & a half years. At the onset of the inspection I spoke with a man who identified himself as Jeff Reynolds, a cousin to Terry Reynolds. J. Reynolds explained they fix up mobile homes & resale them. He said they do not burn on site. Also, he added they reuse almost everything that is brought to the site. It was apparent J. Reynolds had been working in the large pole barn when I arrived. This appears to be where the majority of the work is done. Early in the inspection I spoke with a woman who identified herself as Gladice Jones. She said she lives in a mobile home at the site. It is adjacent to the mobile home designated as Area A. Ms. Jones said her son, E. Jones works in the evenings for Terry Reynolds. She said he is currently working on the mobile next to where she lives.

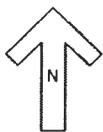
Other than scattered debris, five areas of apparent violations were observed. These have been designated as Area A, Area B, Area C, Area D & Area E. Among the scattered refuse were tires, pipes, general refuse, fabrics & demolition debris. Area A consisted of a dilapidated mobile home. Most of the outside wall running lengthwise on one side of the mobile home was missing. Insulation, as well as other debris, was spilling out of the mobile home onto the ground. Area A was visually estimated to be

approximately 400 cubic yards (45'x20'x12') in size. Among the debris in Area B were bicycles, fabric, gas containers, cardboard, kitchen utensils, plastics, wires, demolition debris, tools & equipment. Area B was estimated to be approximately seven cubic yards (20'x5'x2') in size. Waste in Area C included, but was not limited to, siding, demolition wood, a broken door, cardboard & general refuse. In the eastern end of Area C, concrete with protruding metal was hovering along an embankment just above what appeared to be an intermittent creek bed with a small amount of water in it. Area C was estimated to be approximately 73 cubic yards (52.5'x15'x2.5') in size. Area D consisted of no less than five dilapidated mobile homes, a building that appears to have been a house at one time and other debris. The structures were open to the atmosphere either as a result of broken or missing windows or doors or the lack of whole walls. The structures contained a wide range of waste including, but not limited to furniture, tires, demolition debris & food condiments. The structures were not in use, not useable in their current condition &/or not being protected for future use. Among the other debris in Area D were demolition debris, a toilet, a variety of metal, clothing, furniture, an undetermined number of tires (due to extensive vegetation), a drum labeled as Rotella T15 W-40 with Advanced Soot Control & plastic containers holding water. I observed active mosquito larvae in one of the containers. Area D was estimated to be approximately 2500 cubic yards (135'x100'x5') in size. Area E consisted of approximately 36 tires amongst vegetation. Area E was estimated to be approximately four cubic yards (10'x5'x2') in size.

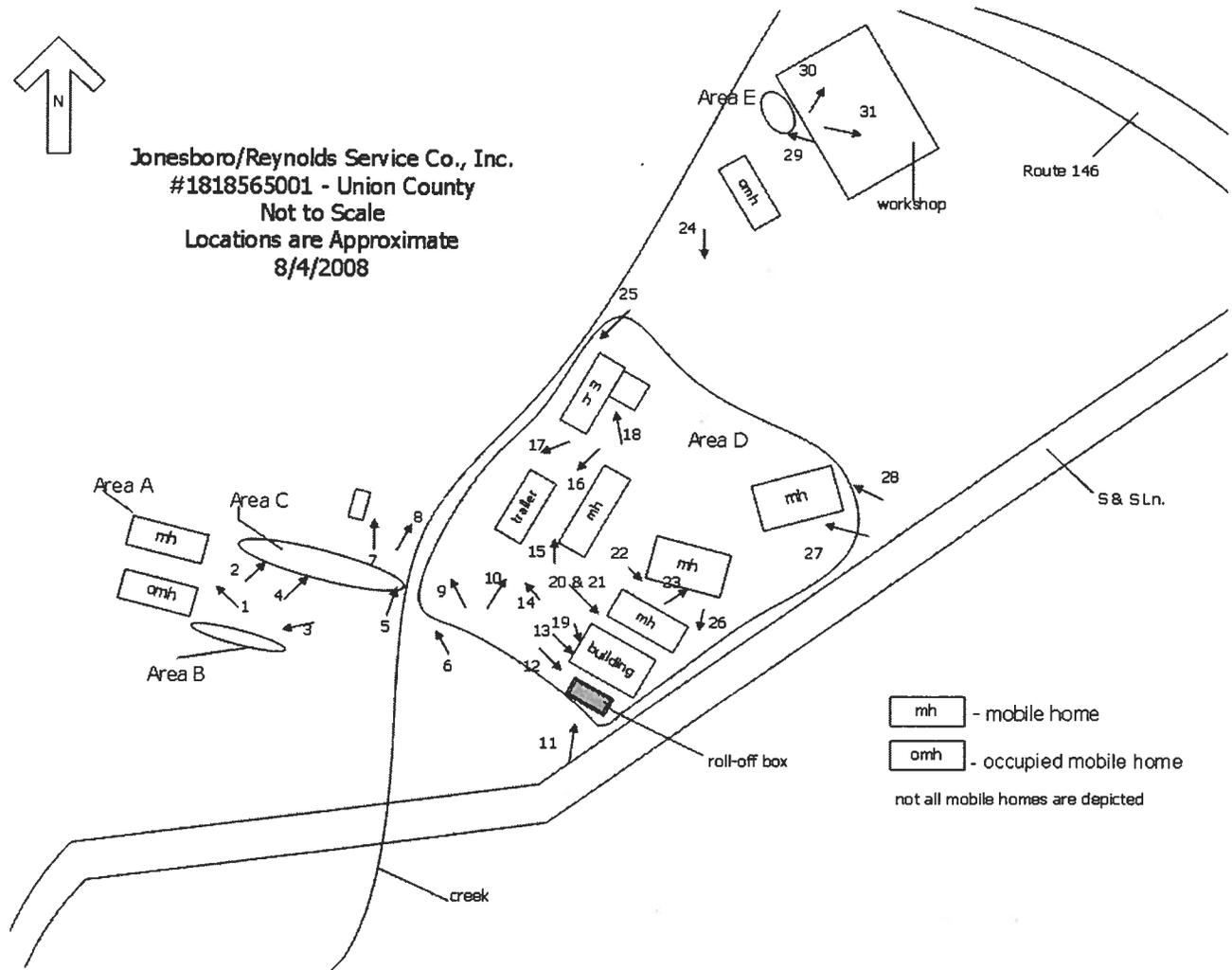
A review of Agency records revealed that this site was initially inspected on July 27, 2000 at which time apparent violations resulting in litter, open burning & the deposition of general construction or demolition debris or clean construction or demolition debris were observed. Following an October 11, 2000 inspection indicating continuing violations, an Administrative Citation was mailed to the attention of Terry Reynolds of Reynolds Manufactured Homes & Transport. On August 5, 2008 I received an e-mail from Michelle Ryan, IEPA Division of Legal Counsel, that indicated the civil penalty of \$1,500 was never paid.

The State of Illinois' corporation file detail report available through the Secretary of State's website revealed Terry Reynolds at 2875 Route 146 West Jonesboro, IL is the president & Linda Reynolds of the same address is the Agent for this corporation.

According to the Union County Supervisor of Assessments Office, the real estate tax bill for this piece of property is sent to Terry Reynolds at 2875 Route 146 West Jonesboro, IL.



Jonesboro/Reynolds Service Co., Inc.  
#1818565001 - Union County  
Not to Scale  
Locations are Approximate  
8/4/2008



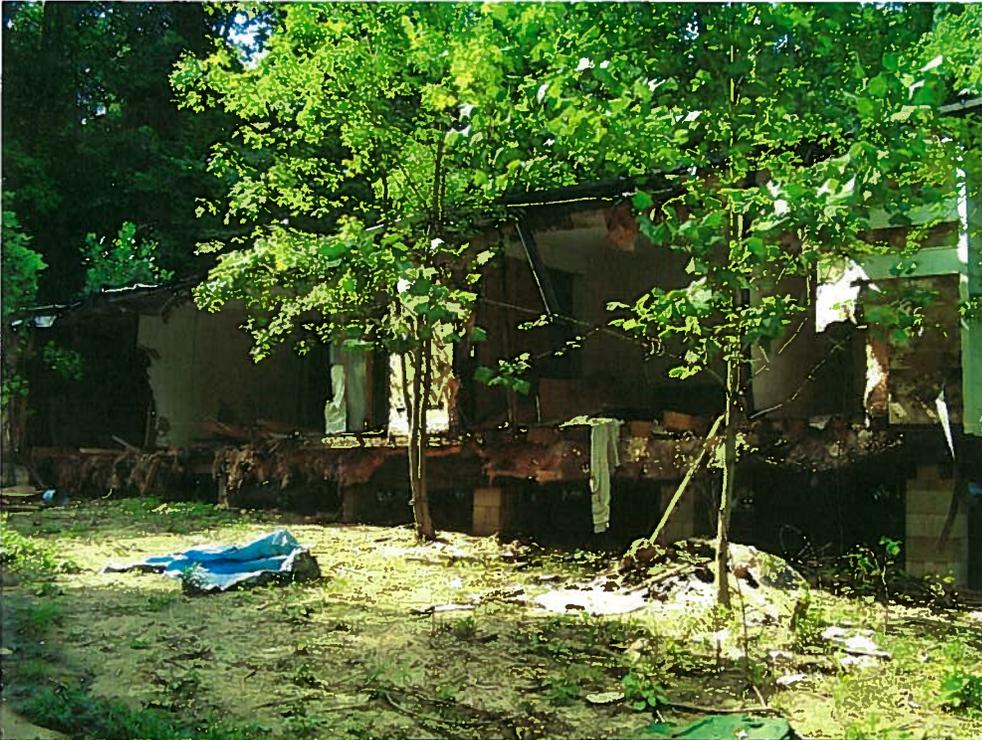
mh - mobile home  
omh - occupied mobile home  
not all mobile homes are depicted



**Illinois Environmental Protection Agency  
Bureau of Land  
Division of Land Pollution Control**

**LPC #1818565001 – Union County  
Jonesboro/Reynolds Service Co., Inc.  
FOS File**

## **DIGITAL PHOTOGRAPHS**



**Date: 8/4/2008  
Time: 3:41 P.M.  
Direction:  
northwest  
Photo by: S.  
Williams  
Exposure #: 001  
Comments:  
dilapidated mobile  
home with debris  
falling onto the  
ground**



**Date: 8/4/2008  
Time: 3:44 P.M.  
Direction:  
northeast  
Photo by: S.  
Williams  
Exposure #: 002  
Comments: siding,  
demolition wood,  
a hose, lawn chair  
& plastic bottle**

**File Names: 1818565001~08042008 - [Exp. #].jpg**



**Illinois Environmental Protection Agency  
Bureau of Land  
Division of Land Pollution Control**

**LPC #1818565001 – Union County  
Jonesboro/Reynolds Service Co., Inc.  
FOS File**

## **DIGITAL PHOTOGRAPHS**



**Date: 8/4/2008  
Time: 3:45 P.M.  
Direction:  
southwest  
Photo by: S.  
Williams  
Exposure #: 003  
Comments: bicycles,  
fabric, gas  
containers, kitchen  
utensils, plastics,  
wires, tools &  
equipment**



**Date: 8/4/2008  
Time: 3:49 P.M.  
Direction: northeast  
Photo by: S.  
Williams  
Exposure #: 004  
Comments: broken  
door, demolition  
wood & general  
refuse**

**File Names: 1818565001~08042008 - [Exp. #].jpg**



**Illinois Environmental Protection Agency  
Bureau of Land  
Division of Land Pollution Control**

**LPC #1818565001 – Union County  
Jonesboro/Reynolds Service Co., Inc.  
FOS File**

### **DIGITAL PHOTOGRAPHS**



**Date: 8/4/2008  
Time: 3:52 P.M.  
Direction: northeast  
Photo by: S.  
Williams  
Exposure #: 005  
Comments: metal &  
concrete on the  
creek embankment**



**Date: 8/4/2008  
Time: 3:53 P.M.  
Direction: northwest  
Photo by: S.  
Williams  
Exposure #: 006  
Comments: cooler,  
gas tank, jacket,  
toilet & tank**

**File Names: 1818565001~08042008 - [Exp. #].jpg**



**Illinois Environmental Protection Agency  
Bureau of Land  
Division of Land Pollution Control**

**LPC #1818565001 – Union County  
Jonesboro/Reynolds Service Co., Inc.  
FOS File**

### **DIGITAL PHOTOGRAPHS**



**Date: 8/4/2008  
Time: 3:55 P.M.  
Direction: north  
Photo by: S.  
Williams  
Exposure #: 007  
Comments: vehicle  
containing debris  
flowing onto the  
ground**



**Date: 8/4/2008  
Time: 3:56 P.M.  
Direction: northeast  
Photo by: S.  
Williams  
Exposure #: 008  
Comments: tires &  
pipe in vegetation**

**File Names: 1818565001~08042008 - [Exp. #].jpg**



**Illinois Environmental Protection Agency  
Bureau of Land  
Division of Land Pollution Control**

**LPC #1818565001 – Union County  
Jonesboro/Reynolds Service Co., Inc.  
FOS File**

## **DIGITAL PHOTOGRAPHS**



**Date: 8/4/2008  
Time: 3:59 P.M.  
Direction: northwest  
Photo by: S.  
Williams  
Exposure #: 009  
Comments: pipe,  
demolition wood &  
fabric along the  
creek embankment**



**Date: 8/4/2008  
Time: 4:01 P.M.  
Direction: northeast  
Photo by: S.  
Williams  
Exposure #: 010  
Comments: toilet,  
demolition debris,  
corrugated metal,  
propane tanks,  
dilapidated mobile  
home, fabrics,  
ceiling light & fan**

**File Names: 1818565001~08042008 - [Exp. #].jpg**



**Illinois Environmental Protection Agency  
Bureau of Land  
Division of Land Pollution Control**

**LPC #1818565001 – Union County  
Jonesboro/Reynolds Service Co., Inc.  
FOS File**

## **DIGITAL PHOTOGRAPHS**



**Date: 8/4/2008  
Time: 4:07 P.M.  
Direction: northeast  
Photo by: S.  
Williams  
Exposure #: 011  
Comments:  
dumpster &  
dilapidated building**



**Date: 8/4/2008  
Time: 4:09 P.M.  
Direction: southeast  
Photo by: S.  
Williams  
Exposure #: 012  
Comments:  
demolition debris  
spilling out of  
building, oven &  
washing machine**

**File Names: 1818565001~08042008 - [Exp. #].jpg**



**Illinois Environmental Protection Agency  
Bureau of Land  
Division of Land Pollution Control**

**LPC #1818565001 – Union County  
Jonesboro/Reynolds Service Co., Inc.  
FOS File**

## **DIGITAL PHOTOGRAPHS**



**Date: 8/4/2008  
Time: 4:09 P.M.  
Direction: southeast  
Photo by: S. Williams  
Exposure #: 013  
Comments: cooking  
pots, demolition  
wood, grill & plastic  
container holding  
water**



**Date: 8/4/2008  
Time: 4:11 P.M.  
Direction: northwest  
Photo by: S. Williams  
Exposure #: 014  
Comments: plastic  
container holding  
water with active  
mosquito larvae**

**File Names: 1818565001~08042008 - [Exp. #].jpg**



**Illinois Environmental Protection Agency  
Bureau of Land  
Division of Land Pollution Control**

**LPC #1818565001 – Union County  
Jonesboro/Reynolds Service Co., Inc.  
FOS File**

## **DIGITAL PHOTOGRAPHS**



**Date: 8/4/2008  
Time: 4:12 P.M.  
Direction: north  
Photo by: S.  
Williams  
Exposure #: 015  
Comments: clothing,  
demolition debris &  
a mattress**



**Date: 8/4/2008  
Time: 4:14 P.M.  
Direction: southwest  
Photo by: S.  
Williams  
Exposure #: 016  
Comments:  
mattress, demolition  
debris & what  
appeared to be  
carpeting amongst  
vegetation**

**File Names: 1818565001~08042008 - [Exp. #].jpg**

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY )  
 )  
 Complainant, )  
 )  
 )  
 )  
 v. )  
 )  
 Reynolds Service Co. Inc. )  
 )  
 )  
 Respondent. )

AC 09-14  
 IEPA DOCKET NO.

AFFIDAVIT

Affiant, Sheila Williams, being first duly sworn, voluntarily deposes and states as follows:

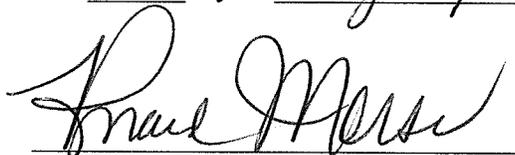
1. Affiant is a field inspector employed by the Land Pollution Control Division of the Illinois Environmental Protection Agency and has been so employed at all times pertinent hereto.
  
2. On August 4, 2008, between 3:35 p.m. and 4:55 p.m., Affiant conducted an inspection of a disposal site operated by Reynolds Service Co., Inc., located in Union County, Illinois, and known as Reynolds Service Co., Inc. by the Illinois Environmental Protection Agency. Said site has been assigned site code number 1818565001 by the Agency.
  
3. Affiant inspected said Reynolds Service Co., Inc. 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 Reynolds Service Co., Inc..

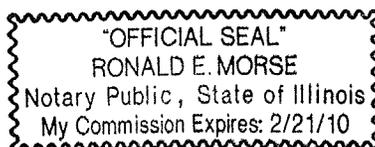


Subscribed and Sworn to before me

this 12 day of August, 2008



Notary Public



SRW:jkb/37261/08-11-08

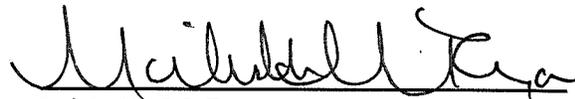
**PROOF OF SERVICE**

I hereby certify that I did on the 9th day of September 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: Reynolds Service So., Inc.  
Attn: Terry Reynolds  
2875 Route 146 West  
P.O. Box 786  
Jonesboro, IL 62952

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



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

September 9, 2008

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

RECEIVED  
CLERK'S OFFICE  
SEP 11 2008  
STATE OF ILLINOIS  
Pollution Control Board  
AC 09-14

Re: Illinois Environmental Protection Agency v. Reynolds Service Co.  
IEPA File No. 214-08-AC: 181565001—Union 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