BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

PEOPLE OF THE STATE OF ILLINOIS,)
Complainant,)
v.) PCB No. 2020-16) (Enforcement)
IRONHUSTLER EXCAVATING, INC.,)
an Illinois corporation, RIVER CITY)
CONSTRUCTION, LLC, an Illinois limited)
liability company, and VENOVICH)
CONSTRUCTION CO., an Illinois)
corporation,)
Respondents.	1

NOTICE OF FILING

TO: See attached service list

PLEASE TAKE NOTICE that I did on December 5, 2019, file with the Office of the Clerk of the Illinois Pollution Control Board by electronic filing the following Notice of Filing and Notice of Service of Discovery of Documents, copies of which are hereby served upon you.

PÉOPLE OF THE STATE OF ILLINOIS ex.rel. KWAME RAOUL, Attorney General of the State of Illinois

MATTHEW J. DUNN, Chief Environmental Enforcement/Asbestos Litigation Division

BY: s/Raymond J. Callery

Raymond J. Callery, #6193579 Assistant Attorney General 500 South Second Street Springfield, Illinois 62701 217/782-9031

rcallery@atg.state.il.us ebs@atg.state.il.us

Dated: December 5, 2019

Electronic Filing: Received, Clerk's Office 12/05/2019

Service List

For the Respondents

Kenneth R. Eathington Jeffrey A. Ryva Matthew A. Warner Quinn Johnston Henderson & Pretorius 227 N.E. Jefferson Street Peoria, IL 61602

Jay H. Scholl Davis & Campbell L.L.C. 401 Main Street, Suite 1600 Peoria, IL 61602-1241

Electronic Filing: Received, Clerk's Office 12/05/2019

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

PEOPLE OF THE STATE OF ILLINOIS,)
Complainant,)
v.) PCB No. 20-16) (Enforcement – Land)
IRONHUSTLER EXCAVATING, INC.,	·)
an Illinois corporation, RIVER CITY)
CONSTRUCTION, LLC, an Illinois limited)
liability company, and VENOVICH)
CONSTRUCTION CO., an Illinois corporation,)
Respondents.	ý

NOTICE OF SERVICE OF DISCOVERY DOCUMENTS

PLEASE TAKE NOTICE that I did on December 5, 2019, served on the Defendants, the following discovery documents in the above-referenced matter.

First Request for Production of Documents to IronHustler Excavating, Inc. First Set of Interrogatories to IronHustler Excavating, Inc. First Request for Production of Documents to River City Construction, LLC First Set of Interrogatories to River City Construction, LLC

Respectfully submitted,

PEOPLE OF THE STATE OF ILLINOIS, ex rel. KWAME RAOUL, Attorney General of the State of Illinois

MATTHEW J. DUNN, Chief Environmental Enforcement/Asbestos Litigation Division

BY: s/Raymond J. Callery

RAYMOND J. CALLERY, #6193579
Assistant Attorney General
Office of the Illinois Attorney General
500 South Second Street
Springfield, Illinois 62706
(217) 782-9031
rcallery@atg.state.il.us
ebs@atg.state.il.us

Electronic Filing: Received, Clerk's Office 12/05/2019

CERTIFICATE OF SERVICE

I, Raymond J. Callery, an Assistant Attorney General, certify that on the 5th day of December, 2019, I caused to be served by e-mail the foregoing Notice of Filing and Notice of Service of Discovery of Documents to the following:

Kenneth R.Eathington
Jeffrey A. Ryva
Matthew A. Warner
Quinn Johnston Henderson & Pretorius
227 N.E. Jefferson Street
Peoria, IL 61602
keathington@quinnjohnston.com
jryva@quinnjohnston.com
mwarner@quinnjohnston.com
Attorneys for River City Construction, LLC

Jay H. Scholl
Davis & Campbell L.L.C.
401 Main Street, Suite 1600
Peoria, IL 61602-1241
jhscholl@dcamplaw.com
Attorney for IronHustler Excavating, Inc.

Carol Webb Illinois Pollution Control Board 1021 North Grand Avenue East P.O. Box 19274 Springfield, IL 62794-9274 carol.webb@illinois.gov

s/Raymond J. Callery
Raymond J. Callery
Assistant Attorney General
500 South Second Street
Springfield, IL 62701
217/782-9031
rcallery@atg.state.il.us
ebs@atg.state.il.us