

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

In the Matter of:)	
)	
STANDARDS FOR THE DISPOSAL)	
OF COAL COMBUSTION RESIDUALS)	R 20-19(A)
IN SURFACE IMPOUNDMENTS:)	
PROPOSED NEW 35 ILL. ADM.)	(Rulemaking – Land)
CODE 845)	

NOTICE OF FILING

TO: Mr. Don A. Brown,	Vanessa Horton,
Clerk of the Board	Hearing Officer
Illinois Pollution Control Board	Illinois Pollution Control Board
100 West Randolph Street, Suite 11-500	100 West Randolph Road, Suite 11-500
Chicago, Illinois 60601	Chicago, Illinois 60601
(VIA ELECTRONIC MAIL)	(VIA ELECTRONIC MAIL)

(SEE PERSONS ON ATTACHED SERVICE LIST)

PLEASE TAKE NOTICE that I have today filed with the Office of the Clerk of the Illinois Pollution Control Board, a **MOTION FOR EXTENSION OF TIME TO FILE THE ILLINOIS ENVIRONMENTAL REGULATORY GROUP'S RESPONSE TO THE MOTION TO MODIFY** copies of which are hereby served upon you.

Respectfully submitted,

ILLINOIS ENVIRONMENTAL
REGULATORY GROUP,

Dated: September 16, 2022

By: /s/ Melissa S. Brown

Melissa S. Brown
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BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

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STANDARDS FOR THE DISPOSAL)
OF COAL COMBUSTION RESIDUALS) **R 20-19(A)**
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MOTION FOR EXTENSION OF TIME TO FILE THE ILLINOIS ENVIRONMENTAL REGULATORY GROUP’S RESPONSE TO MOTION TO MODIFY

NOW COMES the Illinois Environmental Regulatory Group (“IERG”), by and through its attorneys, HEPLERBROOM, LLC, and hereby submits its Motion for Extension of Time to File IERG’s Response to Motion to Modify. In support of this motion, IERG states as follows:

1. On September 2, 2022, the Environmental Law & Policy Center, Little Village Environmental Justice Organization, Prairie Rivers Network, and Sierra Club (collectively “Environmental Groups”) filed a Motion to Modify Certain Provisions of Part 845 and Memorandum in Support.
2. Pursuant to Section 101.500 of the Illinois Pollution Control Board’s regulations, a response to the Motion to Modify would be due 14 days from the date of filing, i.e., by September 16, 2022. 35 Ill. Adm. Code 101.500(d).
3. IERG requires additional time to review the Motion to Modify, discuss the Motion to Modify with IERG’s members, and to determine a path forward.
4. IERG requests an extension up to and including November 4, 2022 to file a response, if any, to the Motion to Modify. This extension request is consistent with the Illinois Environmental Protection Agency’s Motion for Extension also filed today.

5. The requested extension is not for purposes of delay and would not prejudice or harm any party.

WHEREFORE, the Illinois Environmental Regulatory Group respectfully requests that the Illinois Pollution Control Board enter an Order granting IERG's Motion for Extension of Time to File Response to Motion to Modify, granting IERG up to and including November 4, 2022 to file a response with the Illinois Pollution Control Board.

Respectfully submitted,

ILLINOIS ENVIRONMENTAL
REGULATORY GROUP

Dated: September 16, 2022

By: /s/ Melissa S. Brown
One of Its Attorneys

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CERTIFICATE OF SERVICE

I, the undersigned, on oath state the following:

That I have served the attached MOTION FOR EXTENSION OF TIME FOR THE ILLINOIS ENVIRONMENTAL REGULATORY GROUP'S RESPONSE TO THE MOTION TO MODIFY via electronic mail upon:

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That my email address is Melissa.Brown@heplerbroom.com

That the number of pages in the email transmission is 6.

That the email transmission took place before 5:00 p.m. on the date of September 16, 2022.

Date: September 16, 2022

/s/ Melissa S. Brown
Melissa S. Brown