

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

PAUL CHRISTIAN PRATAPAS,)

Complainant,)

) PCB No: 23-013

v.) (Citizens Enforcement – Water))

,)

Respondents)

Lisle Township Road District)

NOTICE OF FILING

TO: See Attached Service List

PLEASE TAKE NOTICE that on 08/09/2023, PAUL CHRISTIAN PRATAPAS electronically filed with the Office of the Clerk of the Illinois Pollution Control Board

RESPONSE TO MOTION, copy of which is hereby served upon you.

Paul Christian Pratapas
Complainant

 _____ 8/9/2023

Paul Christian Pratapas
paul.pratapas@gmail.com
1779 Kirby Parkway, STE 1-92
Memphis, TN 38138
630.210.1637

NOTICE SERVICE

I, Paul Christian Pratapas, certify that I caused the foregoing RESPONSE TO MOTION to be served all parties of record, as shown below:

Paul Christian Pratapas
paulpratapas@gmail.com
1779 Kirby Parkway, Ste 1, #92
Memphis, Tennessee 38138

Illinois Pollution Control Board
Don Brown - Clerk of the Board
don.brown@illinois.gov
100 W. Randolph St. Suite 11-500
Chicago, Illinois 60601
(312)-814-3620

Ancil Glink
David Silverman
dsilverman@ancelglink.com
140 S Dearborn Street. 6th Floor
Chicago, IL 60603
(312)-604-9160

by causing a copy of same to be sent via US Mail to the mailing addresses reflected above,
on the 9th day of 2023, 2023.

Paul Christian Pratapas

Complainant

Paul Christian Pratapas

8/9/2023

08/09/2023
IPCB 2023-013

Paul Christian Pratapas
Complainant
v
Lisle Township Road District
Respondent

COMPLAINANTS RESPONSE TO MOTION

WHEREAS Complainant provided clear photographic evidence with the initial filing depicting violations of The Act by Respondent

WHEREAS Complainant has been ready to proceed since filing the formal complaint

WHEREAS Respondent's failure to understand their responsibilities under The Act lead to egregious violations and delays in proceedings while they circled back and tried to figure out what they did wrong

WHEREAS Respondent has filed two motions delaying the process on 8/10/23 and 9/9/23 respectively

WHEREAS Respondent's violations of The Act posed a direct risk to public health

WHEREAS Respondent has not provided to the board anything to demonstrate their acceptance of responsibility and an abatement plan to avoid similar violations in the future

WHEREAS Without intervention from The Board, this violation will continue to occur not only by Respondent in the same program, but all over The State of Illinois

 8/9/2023

Paul Christian Pratapas
1779 Kirby Parkway, Ste 1, #92
Memphis, TN 38138
630.210.1637