



Service List

KESHEV INVESTMENTS LLC  
d/b/a CD ONE PRICE CLEANERS #9  
c/o Pankaj Patel, Registered Agent  
4N156 Doral Drive  
West Chicago, IL 60185-1204

**CERTIFICATE OF SERVICE**

I, Rebecca Kanz, an Assistant Attorney General, certify that on the 15th day of May 2026, I caused to be served the foregoing Notice of Filing and Complaint on the parties named on the attached Service List, by certified mail with return receipt.

/s/ Rebecca Kanz  
Rebecca Kanz  
Assistant Attorney General  
Environmental Bureau  
Illinois Attorney General's Office  
115 S. LaSalle Street, 23<sup>rd</sup> Floor  
Chicago, Illinois 60603  
(312) 814-3532  
[Rebecca.Kanz@ilag.gov](mailto:Rebecca.Kanz@ilag.gov)

**BEFORE THE ILLINOIS POLLUTION CONTROL BOARD**

PEOPLE OF THE STATE OF ILLINOIS,	)	
by KWAME RAOUL,	)	
Attorney General of the State of Illinois,	)	
	)	
Complainant,	)	
	)	
v.	)	PCB No. 26-
	)	(Enforcement - Air)
KESHAV INVESTMENTS, LLC	)	
d/b/a CD One Price Cleaners #9,	)	
an Illinois limited liability company,	)	
	)	
Respondent.	)	

**COMPLAINT**

Complainant, PEOPLE OF THE STATE OF ILLINOIS, by KWAME RAOUL, Attorney General of the State of Illinois (“Complainant”), complains of Respondent, KESHAV INVESTMENTS, LLC, d/b/a CD ONE PRICE CLEANERS #9, an Illinois limited liability company, as follows:

**COUNT I**

**FAILURE TO SUBMIT 2023 AND 2024 ANNUAL EMISSIONS REPORT**

1. This Complaint is brought on behalf of the People of the State of Illinois by Kwame Raoul, Attorney General of the State of Illinois, on his own motion and at the request of the Illinois Environmental Protection Agency (“Illinois EPA”), against Keshav Investments, LLC, d/b/a CD One Price Cleaners #9, an Illinois limited liability company (“Keshav Investments”), pursuant to Section 31 of the Illinois Environmental Protection Act (“Act”), 415 ILCS 5/31 (2024).

2. The Illinois EPA is an administrative agency of the State of Illinois created pursuant to Section 4 of the Act, 415 ILCS 5/4 (2024), and is charged, inter alia, with the duty of enforcing the Act.

3. At all times relevant to this Complaint, Keshav Investments was and is an Illinois corporation in good standing.

4. Upon information and belief, prior to in or around December 2023, Darville, Inc., d/b/a CD One Price Cleaners Chicago (“Darville”), owned and operated a dry-cleaning facility located at 6600 West North Avenue, Chicago, Cook County, Illinois, 60707 (“Facility”).

5. On May 5, 2006, Illinois EPA issued Lifetime Operating Permit (“LOP”) 06020072 to Cleaners Depot #9 for the Facility.

6. On April 10, 2008, Illinois EPA issued revised LOP 06020072 to Darville due to change of ownership of the Facility.

7. In or around December 2023, Keshav Investments became the owner and operator of the Facility.

8. From in or around December 2023, through the date of the filing of this Complaint, Keshav Investments has owned and operated and continues to own and operate the Facility.

9. Upon information and belief, prior to calendar year 2021, the emission units at the Facility included two (2) perchloroethylene dry cleaning machines.

10. Upon information and belief, after calendar year 2021, the emission units at the Facility included and continue to include two (2) DF-2000 dry cleaning machines. DF-2000 is a petroleum solvent.

11. As of the date of the filing of this Complaint, the Facility is located in an area of Environmental Justice (“EJ”) concern as identified using Illinois EPA EJ Start.

12. Section 9(a) of the Act, 415 ILCS 5/9(a) (2024), provides as follows:

No person shall:

- (a) Cause or threaten or allow the discharge or emission of any contaminant into the environment in any State so as to cause or tend to cause air pollution in Illinois, either alone or in combination with

contaminants from other sources, or so as to violate regulations or standards adopted by the Board under this Act.

13. Section 3.315 of the Act, 415 ILCS 5/3.315 (2024), provides the following definition:

“Person” is any individual, partnership, co-partnership, firm, company, limited liability company, corporation, association, joint stock company, trust, estate, political subdivision, state agency, or any other legal entity, or their legal representative, agent or assigns.

14. Keshav Investments is a “person” as that term is defined in Section 3.315 of the Act, 415 ILCS 5/3.315 (2024).

15. Section 3.165 of the Act, 415 ILCS 5/3.165 (2024), provides the following definition:

“Contaminant” is any solid, liquid, or gaseous matter, any odor, or any form of energy, from whatever source.

16. DF-2000 is a “contaminant” as that term is defined by Section 3.165 of the Act, 415 ILCS 5/3.165 (2024).

17. Section 201.302(a) of the Illinois Pollution Control Board (“Board”) Air Pollution Regulations, 35 Ill. Adm. Code 201.302(a), provides as follows:

The owner or operator of any emission unit or air pollution control equipment meeting the applicability criteria contained in 35 Ill. Adm. Code 254.102 shall submit to the Agency as a minimum, annual reports detailing the nature, specific emission units and total annual quantities of all specified air contaminant emissions; provided, however, that the Agency may require more frequent reports when necessary to accomplish the purposes of the Act and this Chapter.

18. Section 254.102(b) of the Illinois EPA Air Pollution Regulations, 35 Ill. Adm. Code 254.102(b), provides as follows:

Subpart C of this Part applies to the owner or operator of any source of regulated air pollutants required to have an operating permit in accordance with 35 Ill. Adm. Code 201 that is not subject to subsection (a) of this Section.

19. Beginning in or around December 2023 through at least March 2026, on dates better known to Keshav Investments, Keshav Investments caused or allowed the operation of an emissions source and therefore was required to have an operating permit in accordance with 35 Ill. Adm. Code 201. Keshav Investments therefore meets the applicability criteria contained in Section 254.102(b) of the Illinois EPA Air Pollution Regulations, 35 Ill. Adm. Code 254.102(b).

20. Section 211.4370 of the Board Air Pollution Regulations, 35 Ill. Adm. Code 211.4370, provides the following definition:

“Owner or operator” means any person who owns, operates, leases, controls, or supervises a source, an emission unit or air pollution control equipment.

21. Section 211.1950 of the Board Air Pollution Regulations, 35 Ill. Adm. Code 211.1950, provides the following definition:

“Emission unit” means any part or activity at a stationary source that emits or has the potential to emit any air pollutant.

22. Section 211.6370 of the Board Air Pollution Regulations, 35 Ill. Adm. Code 211.6370, provides the following definition:

“Stationary source” means any building, structure, facility, or installation that emits or may emit any air pollutant.

23. Section 211.370 of the Board Air Pollution Regulations, 35 Ill. Adm. Code 211.370, provides the following definition:

“Air pollutant” means an air pollution agent or combination of such agents, including any physical, chemical, biological, radioactive (including source material, special nuclear material, and byproduct material) substance or matter which is emitted into or otherwise enters the atmosphere. Such term includes any precursors to the formation of any air pollutant, to the extent that the relevant statute or rule has identified such precursor or precursors for particular purpose for which the term “air pollutant” is used.

24. Since in or around December 2023 through at least March 2026, on dates better known to Keshav Investments, Keshav Investments was and continues to be an “owner or operator” of an “emission unit,” as the Facility has been, and continues to be, a building, structure, facility, or installation that emits an air pollutant and thereby constitutes a “stationary source,” where Keshav Investments operates its dry-cleaning operation, including two (2) DF-2000 dry-cleaning machines, each of which are an “emission unit” capable of emitting volatile organic material (“VOM”), which is an “air pollutant,” as those terms are defined in Sections 211.4370, 211.1950, 211.6370, 211.1950, and 211.370, respectively, of the Board Air Pollution Regulations, 35 Ill. Adm. Code 211.4370, 211.1950, 211.6370, 211.1950, and 211.370.

25. Section 254.132(a) of the Illinois EPA Air Pollution Regulations, 35 Ill. Adm. Code 254.132(a), provides as follows:

Failure to file a complete Annual Emissions Report by the applicable deadlines prescribed in Section 254.137(a) of this Subpart shall be a violation of this Part and 35 Ill. Adm. Code 201.302(a).

26. Section 254.137(a) of the Illinois EPA Air Pollution Regulations, 35 Ill. Adm. Code 254.137(a), provides as follows:

All Annual Emissions Reports are due by May 1 of the year following the calendar year in which the emissions took place.

27. From in or around December 2023, through at least March 2026, on dates better known to Keshav Investments, Keshav Investments, as the owner or operator of emission units, was required pursuant to Section 201.302(a) of the Board Air Pollution Regulations, 35 Ill. Adm. Code 201.302(a), and Sections 254.132(a) and 254.137(a) of the Illinois EPA Air Pollution Regulations, 35 Ill. Adm. Code 254.132(a) and 254.137(a), to submit complete Annual Emissions Reports (“AERs”) to the Illinois EPA each year by May 1 for the preceding calendar year.

28. Keshav Investments failed to submit complete AERs to the Illinois EPA by May 1 for the preceding calendar year for the years 2023 and 2024 in violation of Section 201.302(a) of the Board Air Pollution Regulations, 35 Ill. Adm. Code 201.302(a), and Sections 254.132(a) and 254.137(a) of the Illinois EPA Air Pollution Regulations, 35 Ill. Adm. Code 254.132(a) and 254.137(a).

29. By violating Section 201.302(a) of the Board Air Pollution Regulations, 35 Ill. Adm. Code 201.302(a), and Sections 254.132(a) and 254.137(a) of the Illinois EPA Air Pollution Regulations, 35 Ill. Adm. Code 254.132(a) and 254.137(a), Keshav Investments thereby also violated Section 9(a) of the Act, 415 ILCS 5/9(a) (2024).

WHEREFORE, Complainant, PEOPLE OF THE STATE OF ILLINOIS, respectfully requests that that the Board enter an Order against Respondent, KESHAV INVESTMENTS, LLC, d/b/a CD ONE PRICE CLEANERS #9, with respect to Count I:

1. Authorizing a hearing in this matter at which time Keshav Investments will be required to answer the allegations herein;

2. Finding that Keshav Investments violated Section 9(a) of the Act, 415 ILCS 5/9(a) (2024), Section 201.302(a) of the Board Air Pollution Regulations, 35 Ill. Adm. Code 201.302(a), and Section 254.132(a) of the Illinois EPA Air Pollution Regulations, 35 Ill. Adm. Code 254.132(a);

3. Ordering Keshav Investments to cease and desist from any future violations of Section 9(a) of the Act, 415 ILCS 5/9(a) (2024), Section 201.302(a) of the Board Air Pollution Regulations, 35 Ill. Adm. Code 201.302(a), and Section 254.132(a) of the Illinois EPA Air Pollution Regulations, 35 Ill. Adm. Code 254.132(a);

4. Assessing against Keshav Investments, pursuant to Section 42(a) of the Act, 415 ILCS 5/42(a) (2024), a civil penalty of Fifty Thousand Dollars (\$50,000.00) for each violation of Section 9(a) of the Act, 415 ILCS 5/9(a) (2024), and Section 201.302(a) of the Board Air Pollution Regulations, 35 Ill. Adm. Code 201.302(a), that occurred prior to June 16, 2025, and an additional Ten Thousand Dollars (\$10,000.00) for each day of each violation that continued prior to June 16, 2025;

5. Assessing against Keshav Investments, pursuant to Section 42(a) of the Act, 415 ILCS 5/42(a) (2024),<sup>1</sup> a civil penalty of One Hundred Thousand Dollars (\$100,000.00) for each violation of Section 9(a) of the Act, 415 ILCS 5/9(a) (2024), and Section 201.302(a) of the Board Air Pollution Regulations, 35 Ill. Adm. Code 201.302(a), that occurred after June 16, 2025, and an additional Twenty-Five Thousand Dollars (\$25,000.00) for each day during which the violations continued after June 16, 2025, with an annual increase on July 1st of each subsequent year calculated pursuant to Section 42(l) of the Act, 415 ILCS 5/42(l);

6. Taxing all costs in this action, including, but not limited to, attorney, expert witness and consultant fees, against Keshav Investments; and

7. Granting such other relief as the Board deems appropriate and just.

---

<sup>1</sup> On June 16, 2025, the State of Illinois enacted Public Act 104-006, which amended Section 42(a) of the Act, 415 ILCS 5/42(a), to change the maximum penalty amounts under that section to \$100,000 per violation and \$25,000 per day each violation continues. Pub. Act 104-006 (eff. June 16, 2025), § 5-35. The amendment provides for these amounts to be increased annually based on the consumer price index. *Id.* The amendment took effect immediately. Pub. Act 104-006, § 99-99.

**COUNT II**

**OPERATING WITHOUT REQUISITE PERMIT**

1. This count is brought on behalf of the PEOPLE OF THE STATE OF ILLINOIS *ex rel.* KWAME RAOUL, Attorney General of the State of Illinois, on his own motion, against Defendant, pursuant to Section 31 of the Act, 415 ILCS 5/31 (2024).

2-15. Complainant re-alleges and incorporates by reference herein paragraphs 2 through 11, and 13 through 16 of Count I, as paragraphs 2 through 15 of this Count II.

16. In or around December 2023, Keshav Investments commenced operation of the Facility and was therefore required to submit an application to Illinois EPA to revise LOP 06020072 due to change of ownership and operations.

17. From in or around December 2023, through at least March 2026, Keshav Investments failed to apply for and obtain from Illinois EPA a revised LOP for the Facility.

18. On March 19, 2026, Keshav Investments submitted to Illinois EPA an application for a Registration of Smaller Sources (“ROSS”) Program Permit for the Facility.

19. As of the date of the filing of this Complaint, Keshav Investments has not been issued either a revised LOP or a ROSS Program Permit for the Facility.

20. Section 9(b) of the Act, 415 ILCS 5/9(b) (2024), provides as follows:

No person shall:

(b) Construct, install, or operate any equipment, facility, vehicle, vessel, or aircraft capable of causing or contributing to air pollution or designed to prevent air pollution, of any type designated by Board regulations, (1) without a permit granted by the Agency unless otherwise exempt by this Act or Board regulations or (2) in violation of any conditions imposed by such permit.

21. Section 3.115 of the Act, 415 ILCS 5/3.115 (2024), provides the following definition:

“Air pollution” is the presence in the atmosphere of one or more contaminants in sufficient quantities and of such characteristics and duration as to be injurious to human, plant, or animal life, to health, or to property, or to unreasonably interfere with the enjoyment of life or property.

22. The Facility was and is capable of causing or contributing to “air pollution” as that term is defined by Section 3.115 of the Act, 415 ILCS 5/3.115 (2024), because it emits, or is capable of emitting, contaminants into the atmosphere in sufficient quantities and of such characteristics and duration as to be injurious to human, plant, or animal life, to health, or to property, or to unreasonably interfere with the enjoyment of life and property.

23. From in or around December 2023, through the date of the filing of this Complaint, or on dates better known to Keshav Investments, Keshav Investments has owned and operated and continues to own and operate the Facility without the requisite permit in violation of Section 9(b) of the Act, 415 ILCS 5/9(b) (2024).

WHEREFORE, Complainant, PEOPLE OF THE STATE OF ILLINOIS, respectfully requests that that the Board enter an Order against Respondent, KESHAV INVESTMENTS, LLC, d/b/a CD ONE PRICE CLEANERS #9, with respect to Count II:

1. Authorizing a hearing in this matter at which time Keshav Investments will be required to answer the allegations herein;

2. Finding that Keshav Investments violated Section 9(b) of the Act, 415 ILCS 5/9(b) (2024);

3. Ordering Keshav Investments to cease and desist from any future violations of Section 9(b) of the Act, 415 ILCS 5/9(b) (2024);

4. Assessing against Keshav Investments, pursuant to Section 42(a) of the Act, 415 ILCS 5/42(a) (2024), a civil penalty of Fifty Thousand Dollars (\$50,000.00) for each violation of Section 9(b) of the Act, 415 ILCS 5/9(b) (2024), that occurred prior to June 16, 2025, and an additional Ten Thousand Dollars (\$10,000.00) for each day of each violation that continued prior to June 16, 2025;

5. Assessing against Keshav Investments, pursuant to Section 42(a) of the Act, 415 ILCS 5/42(a) (2024), a civil penalty of One Hundred Thousand Dollars (\$100,000.00) for each violation of Section 9(b) of the Act, 415 ILCS 5/9(b) (2024), that occurred after June 16, 2025, and an additional Twenty-Five Thousand Dollars (\$25,000.00) for each day during which the violations continued after June 16, 2025, with an annual increase on July 1st of each subsequent year calculated pursuant to Section 42(l) of the Act, 415 ILCS 5/42(l);

6. Taxing all costs in this action, including, but not limited to, attorney, expert witness and consultant fees, against Keshav Investments; and

7. Granting such other relief as the Board deems appropriate and just.

Respectfully submitted,

PEOPLE OF THE STATE OF ILLINOIS  
by KWAME RAOUL, Attorney General  
of the State of Illinois

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

BY: /s/ Stephen J. Sylvester  
STEPHEN J. SYLVESTER, Chief  
Environmental Bureau  
Assistant Attorney General

Of Counsel:

Rebecca Kanz  
Assistant Attorney General  
Environmental Bureau  
Illinois Attorney General's Office  
115 S. LaSalle St., 23rd Floor  
Chicago, Illinois 60603  
(312) 814-3532  
Primary email: Rebecca.Kanz@ilag.gov  
Secondary email: Maria.Cacaccio@ilag.gov