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SEP 22 2003

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

STATE OF ILLINOIS  
Pollution Control Board

ILLINOIS ENVIRONMENTAL )  
PROTECTION AGENCY, )  
 )  
Complainant, )  
 )  
v. )  
 )  
OLEN G. PARKHILL, JR. )  
 )  
Respondent. )

AC 03-33  
(IEPA No. 331-03-AC)

ILLINOIS ENVIRONMENTAL )  
PROTECTION AGENCY, )  
 )  
Complainant, )  
 )  
v. )  
 )  
OLEN G. PARKHILL, JR. )  
 )  
Respondent. )

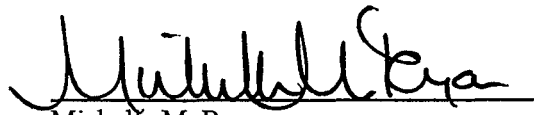
AC 03-# 34  
(IEPA No. 332-03-AC)

NOTICE OF FILING

To: Olen G. Parkhill Jr.  
808 North Prarieview Road  
Mahomet, Illinois 61853

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 MOTION TO CONSOLIDATE FOR PURPOSES OF HEARING.

Respectfully submitted,



Michelle M. Ryan  
Special Assistant Attorney General

Illinois Environmental Protection Agency  
1021 North Grand Avenue East  
P.O. Box 19276  
Springfield, Illinois 62794-9276  
(217) 782-5544

Dated: September 16, 2003

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

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SEP 22 2003

STATE OF ILLINOIS  
*Pollution Control Board*

ILLINOIS ENVIRONMENTAL )  
PROTECTION AGENCY, )  
 )  
Complainant, )  
 )  
v. )  
 )  
OLEN G. PARKHILL, JR. )  
 )  
Respondent. )

AC 03-3  
(IEPA No. 331-03-AC)

ILLINOIS ENVIRONMENTAL )  
PROTECTION AGENCY, )  
 )  
Complainant, )  
 )  
v. )  
 )  
OLEN G. PARKHILL, JR. )  
 )  
Respondent. )

AC 03-4  
(IEPA No. 332-03-AC)

MOTION TO CONSOLIDATE  
FOR PURPOSES OF HEARING

NOW COMES the Complainant, the Illinois Environmental Protection Agency ("Illinois EPA"), by and through its attorney, Special Assistant Attorney General Michelle M. Ryan, pursuant to 35 Ill. Adm. Code 101.406 and 101.500, and respectfully states as follows:

- (1) Pursuant to 35 Ill. Adm. Code 101.500(b) and 101.502, this motion is directed to the hearing officer.

(2) On June 12, Illinois EPA issued two Administrative Citations to the Respondent, based on inspections conducted by Kenneth Keigley on April 15, 2003 (331-03-AC) and May 15, 2003 (332-03-AC) at two separate properties operated by the Respondent.

(3) On July 7, 2003, Respondent filed petitions for review with this Board.

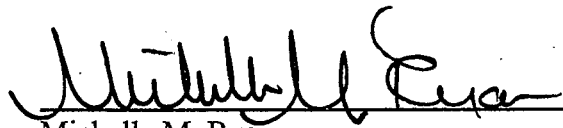
(4) The parties in these two cases are identical, Illinois EPA's main witnesses are likewise identical, and the burdens of proof are identical.

(5) Consolidation for the purpose of hearing is in the interest of convenient, expeditious, and complete determination of claims in each of these cases.

(6) No material prejudice would be caused by consolidating these cases for hearing.

WHEREFORE, the Illinois Environmental Protection Agency requests that the Board consolidate the pending actions against Respondent for purposes of hearing.

ILLINOIS ENVIRONMENTAL  
PROTECTION AGENCY,  
Complainant



Michelle M. Ryan  
Special Assistant Attorney General

Illinois Environmental Protection Agency  
1021 North Grand Avenue East  
P.O. Box 19276  
Springfield, Illinois 62794-9276  
(217) 782-5544

**PROOF OF SERVICE**

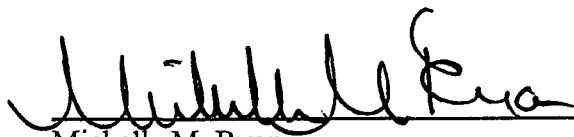
I hereby certify that I did on the 16<sup>th</sup> day of September, 2003, send by U. S. Mail, with postage thereon fully prepaid, a true and correct copy of the following instrument(s) entitled MOTION TO CONSOLIDATE FOR PURPOSES OF HEARING

To: Olen G. Parkhill Jr.  
808 North Prarieview Road  
Mahomet, Illinois 61853

Carol Sudman  
Hearing Officer  
Illinois Pollution Control Board  
1021 North Grand Avenue East  
Springfield, Illinois 62072  
*(via interoffice mail)*

and the original and nine (9) true and correct copies of the same foregoing instruments on the same date by U.S. Mail with postage thereon fully prepaid.

To: Dorothy Gunn, Clerk  
Pollution Control Board  
James R. Thompson Center  
100 West Randolph Street, Suite 11-500  
Chicago, Illinois 60601

  
Michelle M. Ryan  
Special Assistant Attorney General

Illinois Environmental Protection Agency  
1021 North Grand Avenue East  
P.O. Box 19276  
Springfield, Illinois 62794-9276  
(217) 782-5544