



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276, 217-782-3397

JAMES R. THOMPSON CENTER, 100 WEST RANDOLPH, SUITE 11-300, CHICAGO, IL 60601, 312-8

ROD R. BLAGOJEVICH, GOVERNOR

RENEE CIPRIANO, DIRECTOR

RECEIVED
CLERK'S OFFICE

JUL 13 2004

STATE OF ILLINOIS
Pollution Control Board

ACOS-04

(217) 782-9817
TDD: (217) 782-9143

July 9, 2004

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

Re: Illinois Environmental Protection Agency v. G.T. & L, Inc.
IEPA File No. 307-04-AC; 0314865009—Cook County

Dear Clerk Gunn:

Enclosed for filing with the Illinois Pollution Control Board, please find the original and nine true and correct copies of the Administrative Citation Package, consisting of the Administrative Citation, the inspector's Affidavit, and the inspector's Illinois Environmental Protection Agency Open Dump Inspection Checklist, issued to the above-referenced respondent(s).

On this date, a copy of the Administrative Citation Package was sent to the Respondent(s) via Certified Mail. As soon as I receive the return receipt, I will promptly file a copy with you, so that the Illinois Pollution Control Board may calculate the thirty-five (35) day appeal period for purposes of entering a default judgment in the event the Respondent(s) fails or elects not to file a petition for review contesting the Administrative Citation.

If you have any questions or concerns, please do not hesitate to contact me at the number above. Thank you for your cooperation.

Sincerely,

Michelle M. Ryan
Assistant Counsel

Enclosures

INFORMATIONAL NOTICE !!!

IT IS IMPORTANT THAT YOU READ THE ENCLOSED DOCUMENTS.

NOTE: This Administrative Citation refers to TWO separate State of Illinois Agencies. One is the **ILLINOIS POLLUTION CONTROL BOARD** located at State of Illinois Center, 100 West Randolph Street, Suite 11-500, Chicago, Illinois 60601. The other state agency is the **ILLINOIS ENVIRONMENTAL PROTECTION AGENCY** located at: 1021 North Grand Avenue East, P.O. Box 19276, Springfield, Illinois 61794-9276.

If you elect to contest the enclosed Administrative citation, you must file a **PETITION FOR REVIEW** with **thirty-five (35) days** of the date the Administrative Citation was served upon you. Any such Petition for Review must be filed with the clerk of the Illinois Pollution Control Board by either hand delivering or mailing to the Board at the address given above. A copy of the Petition for Review should be either hand-delivered or mailed to the Illinois Environmental Protection Agency at the address given above and should be marked to the **ATTENTION: DIVISION OF LEGAL COUNSEL.**

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

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CLERK'S OFFICE

JUL 13 2004

STATE OF ILLINOIS
Pollution Control Board

ADMINISTRATIVE CITATION

ILLINOIS ENVIRONMENTAL)
PROTECTION AGENCY,)
))
Complainant,)
))
v.)
))
G.T. & L., INC.,)
))
Respondents.)

AC *05-04*
(IEPA No. 307-04-AC)

NOTICE OF FILING

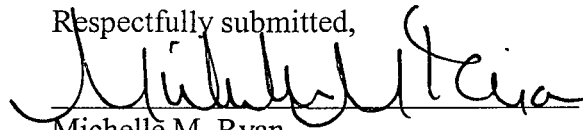
To: Mark A. Kursten, President
2508 Hickory Road
Homewood, IL 60430

Donald P. Bailey, Registered Agent
10729 W. 159th Street
Orland Park, IL 60467

W. Ed Kuersten, Vice President
22341 Sherman Road
Steger, IL 60475

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 ADMINISTRATIVE CITATION, AFFIDAVIT, and OPEN DUMP INSPECTION CHECKLIST.

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: July 8, 2004

RECEIVED
CLERK'S OFFICE

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

JUL 13 2004

ADMINISTRATIVE CITATION

STATE OF ILLINOIS
Pollution Control Board

ILLINOIS ENVIRONMENTAL
PROTECTION AGENCY,)

Complainant,)

v.)

G.T. & L., INC.,)

Respondent.)

AC 05-04

(IEPA No.307-04-AC)

JURISDICTION

This Administrative Citation is issued pursuant to the authority vested in the Illinois Environmental Protection Agency by Section 31.1 of the Illinois Environmental Protection Act, 415 ILCS 5/31.1 (2002).

FACTS

1. That G.T. & L., Inc. ("Respondent") is the present owner and operator of a facility located at 22341 Sherman Road, Steger, Cook County, Illinois. The property is commonly known to the Illinois Environmental Protection Agency as Steger/G.T. & L., Inc.
2. That said facility is an open dump operating without an Illinois Environmental Protection Agency Operating Permit and is designated with Site Code No. 0314865009.
3. That Respondent has owned and operated said facility at all times pertinent hereto.
4. That on May 14, 2004, Calvin Harris and Chris Holy of the Illinois Environmental Protection Agency's DesPlaines Regional Office inspected the above-described facility. A copy of their inspection report setting forth the results of said inspection is attached hereto and made a part hereof.

VIOLATIONS

Based upon direct observations made by Calvin Harris and Chris Holy during the course of their May 14, 2004 inspection of the above-named facility, the Illinois Environmental Protection Agency has determined that Respondent has violated the Illinois Environmental Protection Act (hereinafter, the "Act") as follows:

- (1) That Respondent caused or allowed the open dumping of waste in a manner resulting in litter, a violation of Section 21(p)(1) of the Act, 415 ILCS 5/21(p)(1) (2002).

- (2) That Respondent caused or allowed the open dumping of waste in a manner resulting in deposition of general construction or demolition debris or clean construction or demolition debris, a violation of Section 21(p)(7) of the Act, 415 ILCS 5/21(p)(7) (2002).

CIVIL PENALTY

Pursuant to Section 42(b)(4-5) of the Act, 415 ILCS 5/42(b)(4-5) (2002), Respondent is subject to a civil penalty of One Thousand Five Hundred Dollars (\$1,500.00) for each of the violations identified above, for a total of Three Thousand Dollars (\$3,000.00). If Respondent elects not to petition the Illinois Pollution Control Board, the statutory civil penalty specified above shall be due and payable no later than July 30, 2004, unless otherwise provided by order of the Illinois Pollution Control Board.

If Respondent elects to contest this Administrative Citation by petitioning the Illinois Pollution Control Board in accordance with Section 31.1 of the Act, 415 ILCS 5/31.1 (2002), and if the Illinois Pollution Control Board issues a finding of violation as alleged herein, after an adjudicatory hearing, Respondent shall be assessed the associated hearing costs incurred by the Illinois Environmental

Protection Agency and the Illinois Pollution Control Board. Those hearing costs shall be assessed in addition to the One Thousand Five Hundred Dollar (\$1,500.00) statutory civil penalty for each violation.

Pursuant to Section 31.1(d)(1) of the Act, 415 ILCS 5/31.1(d)(1) (2002), if Respondent fails to petition or elects not to petition the Illinois Pollution Control Board for review of this Administrative Citation within thirty-five (35) days of the date of service, the Illinois Pollution Control Board shall adopt a final order, which shall include this Administrative Citation and findings of violation as alleged herein, and shall impose the statutory civil penalty specified above.

When payment is made, Respondent's check shall be made payable to the Illinois Environmental Protection Trust Fund and mailed to the attention of Fiscal Services, Illinois Environmental Protection Agency, 1021 North Grand Avenue East, P.O. Box 19276, Springfield, Illinois 62794-9276. Along with payment, Respondent shall complete and return the enclosed Remittance Form to ensure proper documentation of payment.

If any civil penalty and/or hearing costs are not paid within the time prescribed by order of the Illinois Pollution Control Board, interest on said penalty and/or hearing costs shall be assessed against the Respondent from the date payment is due up to and including the date that payment is received. The Office of the Illinois Attorney General may be requested to initiate proceedings against Respondent in Circuit Court to collect said penalty and/or hearing costs, plus any interest accrued.

PROCEDURE FOR CONTESTING THIS
ADMINISTRATIVE CITATION

Respondent has the right to contest this Administrative Citation pursuant to and in accordance with Section 31.1 of the Act, 415 ILCS 5/31/1 (2002). If Respondent elects to contest this Administrative Citation, then Respondent shall file a signed Petition for Review, including a Notice of Filing, Certificate of Service, and Notice of Appearance, with the Clerk of the Illinois Pollution Control Board, State of Illinois Center, 100 West Randolph, Suite 11-500, Chicago, Illinois 60601. A copy of said Petition for Review shall be filed with the Illinois Environmental Protection Agency's Division of Legal Counsel at 1021 North Grand Avenue East, P.O. Box 19276, Springfield, Illinois 62794-9276. Section 31.1 of the Act provides that any Petition for Review shall be filed within thirty-five (35) days of the date of service of this Administrative Citation or the Illinois Pollution Control Board shall enter a default judgment against the Respondent.

Renee Cipriano
Renee Cipriano, Director *by will*
Illinois Environmental Protection Agency

Date: 7/9/04

Prepared by: Susan E. Konzelmann, Legal Assistant
Division of Legal Counsel
Illinois Environmental Protection Agency
1021 North Grand Avenue East
P.O. Box 19276
Springfield, Illinois 62794-9276
(217) 782-5544

REMITTANCE FORM

ILLINOIS ENVIRONMENTAL)
PROTECTION AGENCY,)
)
Complainant,) AC
)
v.) (IEPA No. 307-04-AC)
)
G.T. & L., INC.,)
)
Respondent.)

FACILITY: Steger/G.T. & L., Inc. SITE CODE NO.: 0314865009
COUNTY: Cook CIVIL PENALTY: \$3,000.00
DATE OF INSPECTION: May 14, 2004

DATE REMITTED:
SS/FEIN NUMBER:
SIGNATURE:

NOTE

Please enter the date of your remittance, your Social Security number (SS) if an individual or Federal Employer Identification Number (FEIN) if a corporation, and sign this Remittance Form. Be sure your check is enclosed and mail, along with Remittance Form, to Illinois Environmental Protection Agency, Attn.: Fiscal Services, P.O. Box 19276, Springfield, Illinois 62794-9276.

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

AFFIDAVIT

IN THE MATTER OF:

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)
)
)
)

IEPA DOCKET NO.

Respondent,

Affiants, Calvin Harris and Chris Holy, being first duly sworn, voluntary deposes and states as follows:

1. Affiants are field inspectors employed by the Land Pollution Control Division of the Environmental Protection Agency and has been so employed at all times pertinent hereto.
2. On May 14, 2004 between 12:24 PM and 12:55 PM, Affiants conducted an inspection of a disposal site operated without an Agency Permit, located in Cook County, Illinois and known as G.T. & L., Inc. by the Illinois Environmental Protection Agency. Said site has been assigned site code number 0314865009 by the Agency.
3. Affiants inspected said G.T. & L., Inc. open dump site by an on-site inspection which included walking and photographing the site.
4. As a result of the activities referred to in paragraph 3 above, Affiants completed the Inspection Report form attached hereto and made a part hereof, which, to the best of Affiants' knowledge and belief, is an accurate representation of Affiants' observations and factual conclusions with respect to said G.T. & L., Inc. open dump.

Calvin Harris

Christopher J Holy

Subscribed and Sworn to before me
this 8th day of June 2004.

Darlene F. Armstrong
 Notary Public
 "OFFICIAL SEAL"
 DARLENE F. ARMSTRONG
 NOTARY PUBLIC, STATE OF ILLINOIS
 MY COMMISSION EXPIRES 11/17/2006

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

Open Dump Inspection Checklist

County: Cook LPC#: 0314865009 Region: 2 - Des Plaines
 Location/Site Name: Steger/G. T. & L., Inc.
 Date: 05/14/2004 Time: From 12:24 PM To 12:55 PM Previous Inspection Date: 01/08/2004
 Inspector(s): Calvin Harris, Chris Holy Weather: Cloudy, low 70's
 No. of Photos Taken: # 10 Est. Amt. of Waste: >150 yds³ Samples Taken: Yes # No
 Interviewed: No one on site Complaint #: C02-100N

Responsible Party Mailing Address(es) and Phone Number(s):	Mark A. Kuersten, President 2508 Hickory Road Homewood, IL. 60430 Donald P. Bailey, Registered Agent 10729 W. 159 th St. Orland Park, IL. 60467	W. Ed Kuersten, Vice President 22341 Sherman Road Steger, Il. 60475 (708) 757-4210 <div style="text-align: center; font-weight: bold; font-size: 1.2em;">RECEIVED</div> <div style="text-align: center;">JUN 10 2004</div>
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IEPA-DLPC

	SECTION	DESCRIPTION	VIOL
ILLINOIS ENVIRONMENTAL PROTECTION ACT REQUIREMENTS			
1.	9(a)	CAUSE, THREATEN OR ALLOW AIR POLLUTION IN ILLINOIS	<input type="checkbox"/>
2.	9(c)	CAUSE OR ALLOW OPEN BURNING	<input type="checkbox"/>
3.	12(a)	CAUSE, THREATEN OR ALLOW WATER POLLUTION IN ILLINOIS	<input type="checkbox"/>
4.	12(d)	CREATE A WATER POLLUTION HAZARD	<input type="checkbox"/>
5.	21(a)	CAUSE OR ALLOW OPEN DUMPING	<input checked="" type="checkbox"/>
6.	21(d)	CONDUCT ANY WASTE-STORAGE, WASTE-TREATMENT, OR WASTE- DISPOSAL OPERATION:	
	(1)	Without a Permit	<input checked="" type="checkbox"/>
	(2)	In Violation of Any Regulations or Standards Adopted by the Board	<input checked="" type="checkbox"/>
7.	21(e)	DISPOSE, TREAT, STORE, OR ABANDON ANY WASTE, OR TRANSPORT ANY WASTE INTO THE STATE AT/TO SITES NOT MEETING REQUIREMENTS OF ACT	<input checked="" type="checkbox"/>
8.	21(p)	CAUSE OR ALLOW THE OPEN DUMPING OF ANY WASTE IN A MANNER WHICH RESULTS IN ANY OF THE FOLLOWING OCCURRENCES AT THE DUMP SITE:	
	(1)	Litter	<input checked="" type="checkbox"/>
	(2)	Scavenging	<input type="checkbox"/>
	(3)	Open Burning	<input type="checkbox"/>
	(4)	Deposition of Waste in Standing or Flowing Waters	<input type="checkbox"/>
	(5)	Proliferation of Disease Vectors	<input type="checkbox"/>
	(6)	Standing or Flowing Liquid Discharge from the Dump Site	<input type="checkbox"/>

LPC # 05/14/04

Inspection Date: 0314865009

	(7)	Deposition of General Construction or Demolition Debris; or Clean Construction or Demolition Debris	<input checked="" type="checkbox"/>
9.	55(a)	NO PERSON SHALL:	
	(1)	Cause or Allow Open Dumping of Any Used or Waste Tire	<input type="checkbox"/>
	(2)	Cause or Allow Open Burning of Any Used or Waste Tire	<input type="checkbox"/>
35 ILLINOIS ADMINISTRATIVE CODE REQUIREMENTS SUBTITLE G			
10.	812.101(a)	FAILURE TO SUBMIT AN APPLICATION FOR A PERMIT TO DEVELOP AND OPERATE A LANDFILL	<input checked="" type="checkbox"/>
11.	722.111	HAZARDOUS WASTE DETERMINATION	<input type="checkbox"/>
12.	808.121	SPECIAL WASTE DETERMINATION	<input type="checkbox"/>
13.	809.302(a)	ACCEPTANCE OF SPECIAL WASTE FROM A WASTE TRANSPORTER WITHOUT A WASTE HAULING PERMIT, UNIFORM WASTE PROGRAM REGISTRATION AND PERMIT AND/OR MANIFEST	<input type="checkbox"/>
OTHER REQUIREMENTS			
14.		APPARENT VIOLATION OF: (<input type="checkbox"/>) PCB; (<input type="checkbox"/>) CIRCUIT COURT CASE NUMBER: ORDER ENTERED ON:	<input type="checkbox"/>
15.	OTHER:		<input type="checkbox"/>
16.	21(q)	No person shall conduct a landscape waste composting operation without an Agency Permit.	<input checked="" type="checkbox"/>
17.	807.201	Development of a solid waste management site without a Development Permit issued by the Agency.	<input checked="" type="checkbox"/>
18.	807.202	Operating a solid waste management site without an Operating Permit issued by the Agency.	<input checked="" type="checkbox"/>
			<input type="checkbox"/>
			<input type="checkbox"/>

Calvin H. Christopher Holy
Signature of Inspector(s)

Informational Notes

- [Illinois] Environmental Protection Act: 415 ILCS 5/4.
- Illinois Pollution Control Board: 35 Ill. Adm. Code, Subtitle G.
- Statutory and regulatory references herein are provided for convenience only and should not be construed as legal conclusions of the Agency or as limiting the Agency's statutory or regulatory powers. Requirements of some statutes and regulations cited are in summary format. Full text of requirements can be found in references listed in 1. and 2. above.
- The provisions of subsection (p) of Section 21 of the [Illinois] Environmental Protection Act shall be enforceable either by administrative citation under Section 31.1 of the Act or by complaint under Section 31 of the Act.
- This inspection was conducted in accordance with Sections 4(c) and 4(d) of the [Illinois] Environmental Protection Act: 415 ILCS 5/4(c) and (d).
- Items marked with an "NE" were not evaluated at the time of this inspection.

0314865009-Cook County
Steger/ G.T. & L., Inc.
FOS
C02-100N
June 7, 2004
Calvin Harris
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RECEIVED

JUN 10 2004

IEPA-DLPC

NARRATIVE
Prepared by Calvin Harris

On May 14, 2004, I conducted a follow-up inspection at G. T. & L., Inc., located at 22341 Sherman Road, Steger, Illinois. This inspection was conducted to assess the quantities of landscape debris and construction or demolition debris observed on site since an inspection conducted on January 8, 2004. IEPA inspector Chris Holy accompanied me. No one from G.T. & L., Inc., was present during the inspection.

During the inspection I observed landscape debris that had been placed on the eastern part of the property. This material in the form of grass clippings appeared to be composting. Also, concrete with protruding metal was also seen on site. The amount of this material exceeded quantities observed during the January 8, 2004 inspection. In addition, large quantities of soil commingled with construction or demolition debris were observed on site. This quantity exceeded 100 cubic yards. The slag material observed during previous inspections appeared to be used as road based material.

The following apparent violations were observed on site:

Section 21(a): No person shall or allow open dumping of any waste.

Section 21(d)(1): No person shall conduct any waste storage, waste treatment, or waste disposal operation: without a Permit.

Section 21(d)(2): No person shall conduct any waste storage, waste treatment, or waste disposal operation: in violation of any Regulations or Standards adopted by the Board.

Section 21(e): No person shall dispose, treat, store, or abandon any waste, or transport any waste into the State at/to sites not meeting the requirements of the Act.

Section 21(p)(1): No person shall cause or allow the open dumping of any waste in a manner which results in any of the following occurrences at the dump site: Litter.

0314865009-Cook County
Steger/ G.T. & L., Inc.
FOS
C02-100N
June 7, 2004
Calvin Harris
Page 2

Section 21(p)(7): No person shall cause or allow the open dumping of any waste in a manner which results in any of the following occurrences at the dump site: deposition of general construction or demolition debris as defined in Section 3.160(a) of this Act.

Section 21(q): No person shall conduct a landscape waste composting operation without an Agency Permit.

35 IAC 807.201: No person shall cause or allow the development of any new solid waste management site without a Development Permit issued by the Agency.

35 IAC 807.202: No person shall operate any solid waste management site for which a Development Permit is required under Section 807.201 without an Operating Permit issued by the Agency.

35 IAC 812.101(a): All persons, except those specifically exempted by Section 21(d) of the Environmental Protection Act (Act) (Ill. Rev. Stat. 1991, ch. 111 ½, pars. 1021(d) [415 ILCS 5/12 (d)] shall submit to the Agency an application for a permit to develop and operate a landfill. The application must contain the information required by this Subpart and Section 39(a) of the Act, except as otherwise provided in 35 Ill. Adm. Code 817. No Permit Application was submitted to the Agency.

0314865009-Cook County

Steger/G.T. & L., Inc.

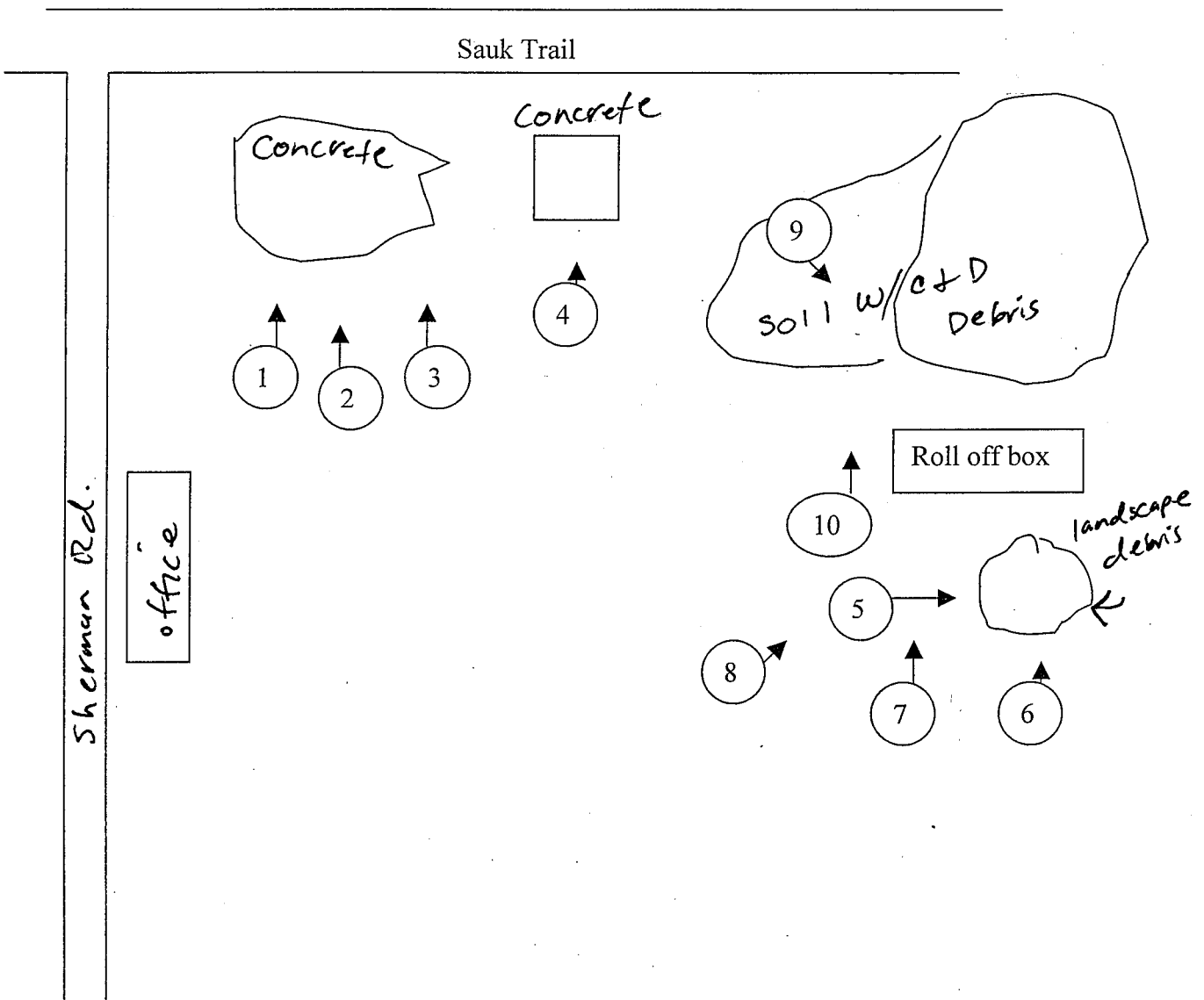
FOS

C02-100N

May 14, 2004; Not to scale



Photograph taken and direction; 12:24 PM-12:55 PM



LPC # 0314865009- Cook County
Steger/G.T. & L., Inc.
FOS File

DIGITAL PHOTOGRAPH PHOTOCOPIES

DATE: 05/14/04
TIME: 12:24 PM-12:55 PM
DIRECTION: North
PHOTO by: C. Harris
PHOTO FILE NAME:
0314865009~05142004-001
COMMENTS: North view of
piled concrete.



DATE: 05/14/04
TIME: 12:24 PM-12:55 PM
DIRECTION: North
PHOTO by: C. Harris
PHOTO FILE NAME:
0314865009~05142004-002
COMMENTS: North view of
piled concrete.



LPC # 0314865009- Cook County
Steger/G.T. & L., Inc.
FOS File

DIGITAL PHOTOGRAPH PHOTOCOPIES

DATE: 05/14/04
TIME: 12:24 PM-12:55 PM
DIRECTION: North
PHOTO by: C. Harris
PHOTO FILE NAME:
0314865009~05142004-003
COMMENTS: North view of
piled concrete and bricks.



DATE: 05/14/04
TIME: 12:24 PM-12:55 PM
DIRECTION: North
PHOTO by: C. Harris
PHOTO FILE NAME:
0314865009~05142004-004
COMMENTS: North view of
stacked concrete.



LPC # 0314865009- Cook County
Steger/G.T. & L., Inc.
FOS File

DIGITAL PHOTOGRAPH PHOTOCOPIES

DATE: 05/14/04
TIME: 12:24 PM-12:55 PM
DIRECTION: East
PHOTO by: C. Harris
PHOTO FILE NAME:
0314865009~05142004-005
COMMENTS: East view of
grass clippings.



DATE: 05/14/04
TIME: 12:24 PM-12:55 PM
DIRECTION: ~~East~~ North *CH*
PHOTO by: C. Harris
PHOTO FILE NAME:
0314865009~05142004-006
COMMENTS: ~~East~~ view of
composting grass clippings.



LPC # 0314865009- Cook County
Steger/G.T. & L., Inc.
FOS File

DIGITAL PHOTOGRAPH PHOTOCOPIES

DATE: 05/14/04
TIME: 12:24 PM-12:55 PM
DIRECTION: North
PHOTO by: C. Harris
PHOTO FILE NAME:
0314865009~05142004-007
COMMENTS: North view of
soil commingled with
construction or demolition debris;
15 cubic yard roll-off box with
landscape debris.



DATE: 05/14/04
TIME: 12:24 PM-12:55 PM
DIRECTION: Northeast
PHOTO by: C. Harris
PHOTO FILE NAME:
0314865009~05142004-008
COMMENTS: Northeast view of
soil commingled with
construction or demolition debris;
15 cubic yard roll-off box with
landscape debris.



LPC # 0314865009- Cook County
Steger/G.T. & L., Inc.
FOS File

DIGITAL PHOTOGRAPH PHOTOCOPIES

DATE: 05/14/04
TIME: 12:24 PM-12:55 PM
DIRECTION: Southeast
PHOTO by: C. Harris
PHOTO FILE NAME:
0314865009~05142004-009
COMMENTS: Southeast view of
soil commingled with
construction or demolition debris.



DATE: 05/14/04
TIME: 12:24 PM-12:55 PM
DIRECTION: North
PHOTO by: C. Harris
PHOTO FILE NAME:
0314865009~05142004-010
COMMENTS: North view of
soil commingled with
construction or demolition debris.



PROOF OF SERVICE

I hereby certify that I did on the 9th day of July 2004, send by Certified Mail, Return Receipt Requested, with postage thereon fully prepaid, by depositing in a United States Post Office Box a true and correct copy of the following instrument(s) entitled ADMINISTRATIVE CITATION, AFFIDAVIT, and OPEN DUMP INSPECTION CHECKLIST

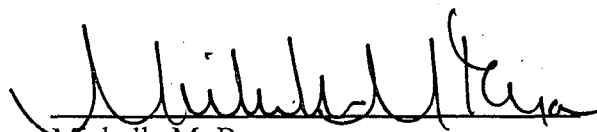
To: Mark A. Kursten, President
2508 Hickory Road
Homewood, IL 60430

Donald P. Bailey, Registered Agent
10729 W. 159th Street
Orland Park, IL 60467

W. Ed Kuersten, Vice President
22341 Sherman Road
Steger, IL 60475

and the original and nine (9) true and correct copies of the same foregoing instruments on the same date by Certified Mail, Return Receipt Requested, 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