

**BEFORE THE ILLINOIS
POLLUTION CONTROL BOARD**

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CLERK'S OFFICE

JUL 19 2005

STATE OF ILLINOIS
Pollution Control Board

GRAND PIER CENTER LLC)
AMERICAN INTERNATIONAL)
SPECIALTY LINES INSURANCE CO.)
as subrogee of GRAND PIER CENTER LLC)

Complainants,)

v.)

RIVER EAST LLC)
CHICAGO DOCK AND CANAL TRUST)
CHICAGO DOCK AND CANAL COMPANY)
KERR-McGEE CHEMICAL LLC)

Respondents.)

PCB 05-157

(Citizens Enforcement - Land)

NOTICE OF MOTION

TO:	Frederick S. Mueller Daniel C. Murray Garrett L. Boehm, Jr. JOHNSON & BELL, LTD. 55 East Monroe Street Suite 4100 Chicago, IL 60603-5803	Donald J. Moran Pedersen & Houpt 161 North Clark Street Suite 3100 Chicago, IL 60601-3242	Michael P. Connelly Garrett C. Carter Connelly Roberts & McGivney, LLC One North Franklin Street Suite 1200 Chicago, IL 60606
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NOTICE OF FILING

PLEASE TAKE NOTICE that on July 7, 2005, we caused to be filed with the Illinois Pollution Control Board in the James R. Thompson Center, Chicago, Illinois, our Motion to Appear Pro Hac Vice and Appearance on behalf of Kerr-McGee Chemical LLC, a copy of which is served upon you along with this notice.

Dated: July 7, 2005

Respectfully submitted,

Kerr-McGee Chemical LLC

By: _____

One of its attorneys

J.T. Smith II – Lead Attorney
Thomas E. Hogan
COVINGTON & BURLING
1201 Pennsylvania Ave., N.W.
Washington, D.C. 20004-2401
(202) 662-6000

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CHICAGO DOCK AND CANAL COMPANY
KERR-McGEE CHEMICAL LLC

Respondents.

PCB 05-157
(Enforcement)

MOTION TO APPEAR *PRO HAC VICE*

Pursuant to 35 Ill. Adm. Code 101.400(a)(3), J.T. Smith II and Thomas E. Hogan of the law firm of Covington & Burling, located in Washington, D.C., request the Illinois Pollution Control Board to enter an order allowing them to appear *pro hac vice* in the above-captioned case as additional counsel for Kerr-McGee Chemical LLC.

Dated: July 7, 2005

Respectfully submitted,

Kerr-McGee Chemical LLC

By: _____

One of its attorneys

J.T. Smith II – Lead Attorney
Thomas E. Hogan
COVINGTON & BURLING
1201 Pennsylvania Ave., N.W.
Washington, D.C. 20004-2401
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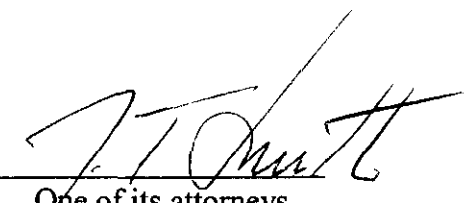
RIVER EAST LLC)
CHICAGO DOCK AND CANAL TRUST)
CHICAGO DOCK AND CANAL COMPANY)
KERR-McGEE CHEMICAL LLC)

Respondents.)

PCB 05-157
(Enforcement)

APPEARANCE

I hereby file my appearance in this proceeding, on behalf of **Kerr-McGee Chemical LLC.**

By: 
One of its attorneys

J.T. Smith II – Lead Attorney
Thomas E. Hogan
COVINGTON & BURLING
1201 Pennsylvania Ave., N.W.
Washington, D.C. 20004-2401
(202) 662-6000

PROOF OF SERVICE

Clara Santos, a non-attorney, on oath states that she served the foregoing Motion to Appear *Pro Hac Vice* and Appearance for counsel for Kerr-McGee Chemical LLC by enclosing same in an envelope addressed to the following parties as stated below, and by depositing same in the U.S. mail on or before 5:00 p.m. on this 7th day of July, 2005.

Frederick S. Mueller
Daniel C. Murray
Garrett L. Boehm, Jr.
Johnson & Bell, Ltd.
55 East Monroe Street, Suite 4100
Chicago, Illinois 60603

Donald J. Moran
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Michael P. Connelly
Garrett C. Carter
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Chicago, IL 60606

Bradley P. Halloran
Hearing Officer
Illinois Pollution Control Board
James R. Thompson, Suite 11-500
100 W. Randolph Street
Chicago, IL 60601



Clara Santos