ELECTRONIC FILING, RECEIVED, CLERK'S OFFICE, JULY 28, 2005

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

DIMUCCI DEVELOPMENT CORPORATION,

Petitioner,

v.

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY,

PCB No. 04-209 (UST Appeal)

Respondent.

MOTION TO WITHDRAW

Now comes Jeep & Blazer, L.L.C., attorneys for Petitioner, DiMucci Development Corporation, and moves the Illinois Pollution Control Board ("Board") for leave to withdraw. In support thereof, Jeep & Blazer, L.L.C. states as follows:

1. The client and its counsel are unable to work together.

2. The client and its counsel mutually agree that the best interests of the client would be served by counsel's withdrawal.

Wherefore, DiMucci Development Corporation respectfully requests that the Illinois Pollution Control Board (the "Board") enter an order granting Jeep and Blazer, LLC to withdraw as counsel for DiMucci Development Corporation.

Respectfully submitted,

By:

s/ Thomas S. Yu

One of its attorneys

Thomas S. Yu Jeep & Blazer, L.L.C. 1749 S. Naperville Road, Suite 102 Wheaton, IL 60187 (630) 681-2530 tsyu@enviroatty.com

ELECTRONIC FILING, RECEIVED, CLERK'S OFFICE, JULY 28, 2005

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

DIMUCCI DEVELOPMENT CORPORATION,

Petitioner,

v.

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY,

PCB No. 04-209 (UST Appeal)

Respondent.

NOTICE OF FILING AND PROOF OF SERVICE

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

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

DiMucci Development Corporation Larry Kowalczyk 100 West Dundee Rd. Palatine, IL 60067 John J. Kim Special Assistant Attorney General Illinois Environmental Protection Agency Division of Legal Counsel 1021 North Grand Avenue East P.O. Box 19276 Springfield, Illinois 62794-9276

Environmental Protection Industries Michael Musa President/CEO 16650 S. Canal South Holland, IL 60473

PLEASE TAKE NOTICE that on Thursday, July 28, 2005, I filed with the Clerk of the Illinois Pollution Control Board of the State of Illinois via electronic filing, a Motion to Withdraw, for filing in the above-entitled cause, copies of which are attached hereto.

The undersigned hereby certifies that copies of the Notice of Filing, together with copies of the documents described above were served upon the above persons, via certified mail, return receipt requested, and by depositing same in the United States Mail on July 28, 2005

Dated: July 28, 2005

Respectfully Submitted,

s/ Thomas S. Yu

By: _

Thomas S. Yu

Jeep & Blazer, L.L.C. 1749 S. Naperville Road, Suite 102 Wheaton, IL 60187 (630) 681-2530 Fax (630) 690-2812 tsyu@enviroatty.com