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ILLINOIS POLLUTION CONTROL BOARD

ILLINOIS ENVIRONMENTAL)
PROTECTION AGENCY,)
)
Plaintiff,)
) AC 05-18
Vs.)(IEPA No. 409-00-AC)
)(Administrative Citation)
WILLIAM SHRUM,)
)
Defendant.)

Proceedings held on November 17, 2005, at 1:30 p.m., at Perry County Courthouse, Public Square, Pinckneyville, Illinois, before Carol Webb, Hearing Officer.

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A P P E A R A N C E S

ILLINOIS POLLUTION CONTROL BOARD
HEARING OFFICER

BY: Carol Webb
1021 North Grand Ave
Springfield, Illinois 62794

FOR RESPONDENT WILLIAM SHRUM

BY: Mr. Kevin Babb.

FOR ENVIRONMENTAL PROTECTION AGENCY
SPECIAL ASSISTANT ATTORNEY GENERAL

BY: Ms. Michelle Ryan

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E X H I B I T S

NUMBER

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4	Exhibit No. 1	8
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P R O C E E D I N G S

(November 17, 2005; 1:30 p.m.)

HEARING OFFICER WEBB: Good afternoon, my
name is Carol Webb, and I'm a hearing officer with the

6 Pollution Control Board. This is the hearing for
7 AC-05-18, IEPA verses William Shrum. It is November 17,
8 2005, and we are beginning at 1:30 p.m.

9 I will note for the record there are no
10 members of the public present. Members of the public
11 are allowed to provide public comment if they so choose.

12 As issue in this case is EPA's allegation
13 that respondent violated Sections 21(p)(1) and (p)(7) of
14 the Environmental Protection Act at his facility located
15 about three miles northwest of Tamaroa in Perry County.

16 You should know that it is the Pollution
17 Control Board, and not me, that will make the final
18 decision in this case. My purpose is to conduct the
19 hearing in a neutral and orderly manner, so that we have
20 a clear record of the proceedings. I will also assess
21 the credibility of any witness on the record at the end
22 of the hearing.

23 This hearing was noticed pursuant to the Act
24 and the Board's rules, and will be conducted pursuant to

5

1 Sections 101.600 through 101.632 of the Board's
2 procedural rules.

3 I would like to ask the parties to please
4 make their appearances on the record.

5 MS. RYAN: Michelle Ryan, Special Assistant
6 Attorney General for the EPA.

7 MR. BABB: Kevin Babb on behalf of
8 respondent, William Shrum.

9 HEARING OFFICER WEBB: Thank you, are there
10 any preliminary matters to discuss on the record?

11 MS. RYAN: No, just that I also, as I did
12 this morning, left my formal appearance on my desk in
13 Springfield, and I will have that filed as soon as I get
14 back to my desk.

15 HEARING OFFICER WEBB: Okay. Ms. Ryan, would
16 you like to make an opening statement?

17 MS. RYAN: Yes. We believe that the evidence
18 today will show that on July 2, 2004, open dumping
19 resulting in litter and the deposition of construction
20 or demolition debris occurred at the Shrum property,
21 approximately three and a half miles northwest of
22 Tamaroa in Perry County, Illinois.

23 HEARING OFFICER WEBB: Mr. Babb, do you care
24 to make an opening statement?

6

1 MR. BABB: We believe the evidence will show
2 that during the time that the respondent has owned the
3 property, that there has been no dumping of any debris,
4 which is the subject of the citation, resulted from the
5 act of third parties, not a party to this proceeding,
6 and were not the responsibility, the acts, or control of
7 the respondent.

8 HEARING OFFICER WEBB: Thank you. Ms. Ryan,
9 you may call your first witness.

10 DIRECT EXAMINATION

11

By Ms. Ryan:

12

MS. RYAN: We call Kent Johnson.

13

(Witness Sworn.)

14

Q. Can you state your name and spell it for the

15

record?

16

A. My name is Kent Johnson, K-E-N-T J-O-H-N-S-O-N.

17

Q. On July 2, 2004 what was your job?

18

A. I work for Bureau of Land with the Illinois

19

Environmental Protection Agency as an inspector.

20

Q. How many years were you an inspector for the

21

Bureau of Land with the Illinois EPA?

22

A. Approximately twelve and a half years.

23

Q. In the twelve and a half years that you did land

24

inspections, approximately how many inspections did you

7

1

conduct?

2

A. Several hundred, at a minimum.

3

Q. What's your educational background?

4

A. I have a bachelor's degree in aquatic biology.

5

Q. From?

6

A. Bemidji State University. Spelling of Bemidji is

7

B-E-M-I-D-J-I, State University in Minnesota.

8

Q. Have you had any other training related to

9

inspections besides your educational background?

10

A. In house training and seminars, on the job

11

training through Illinois EPA relating to everything

12

from ground water, to land fills, to inspector training

13

technique, various types of training in that regard.

14 Q. Are you familiar with the property that Illinois
15 EPA has designated Tamaroa William Shrum Number 2?

16 A. I am.

17 Q. Where is that property located?

18 A. It's located northwest of Tamaroa, Illinois, in
19 Perry County, it's at the intersection of Shamrock Road,
20 and Corgan Road, as I recall. The Shamrock turns to the
21 west at that location, and the roads just basically to
22 the north of that intersection.

23 Q. On July 2, 2004 who owned that property?

24 A. William Shrum.

8

1 Q. How many inspections did you conduct at that
2 property?

3 A. One.

4 Q. Do you recall what caused you to conduct an
5 inspection on July 2, 2004?

6 A. On that date, it was in response to a complaint
7 alleging open dumping of demolition debris and litter.

8 Q. Who was that complaint from?

9 A. It was an anonymous complaint related through
10 another member of the Illinois EPA, Brian Rodley.

11 Q. And who does Brian Rodley work for in Illinois
12 EPA?

13 A. He is working for Office of Pollution Prevention.

14 Q. Did Brian Rodley do any investigation of the
15 complaint before he reported it to you?

16 A. As he lives in the area, he did take photos from
17 off site for reference, and provided them to me.

18 Q. I've provided you what we've marked for reference
19 as Exhibit 1. Can you identify those? Do you recognize
20 this photograph?

21 A. I do.

22 Q. And where did they come from?

23 A. They are of the property in question, William
24 Shrum Number two.

9

1 Q. Did you take those photographs?

2 A. I did not take them.

3 Q. Do you know who did?

4 A. Brian Rodley, as he explained to me that he
5 provided them to me.

6 Q. It was these photographs that caused you to
7 conduct an inspection later on July 2, 2004?

8 A. That, in addition to verbal complaint received,
9 yes.

10 Q. Do you know when you were supplied these
11 photographs?

12 A. June of 2004, I don't recall exact date I was
13 provided the photos, I believe they were taken in the
14 early part of June 2004.

15 Q. I now am showing you what I marked as Exhibit 2.
16 Do you recognize this document?

17 A. I do.

18 Q. What is it?

19 A. It is a copy of my inspection report from the
20 July 2, 2004 inspection.

21 Q. Is this an accurate and complete copy of your
22 report?

23 A. It appears to be, yes.

24 Q. Can you describe the property, generally?

10

1 A. The property generally as I indicate before is
2 rural property, consisting of no dwellings on this part
3 of the property, as I understand it, it does extend to
4 another part across the road, but this is an
5 intersection, largely just vegetation, and at the time
6 of the inspection, waste and debris.

7 Q. Trees or low vegetation, or a combination?

8 A. The property had woody vegetation, short
9 vegetation, grassy vegetation, except in the area of
10 recent activity, where there was no vegetation, and
11 recent dirt work, and waste was in that area.

12 Q. How did the condition of the site when you went
13 out there on July 2, 2004, compare to the photograph
14 that you received from Brian Rodley?

15 A. The photos that Brian provided show materials in
16 piles, where as, when I did my inspection in July '04,
17 the material had appeared to have been spread by some
18 type of moving equipment, dozer or something of that
19 nature.

20 Q. Did you see any such equipment on the property

21 when you were out there?

22 A. I did not, not in that area.

23 Q. Who took the photographs attached to the July 2,
24 2004 report?

11

1 A. I did.

2 Q. And starting with photograph number 1, which
3 Kevin, if you look at the photo file name, the very last
4 three digits, are the photo number. Starting with photo
5 number one, if you can describe what is shown in the
6 picture?

7 A. Photos one and two were taken, basically at the
8 north end of the active area, looking down for the most
9 part, and show the type of debris that's in there.
10 There's blocks, photo one there's a board there, maybe
11 part of a palate, I'm not sure, may not, I'm not really
12 sure about it. There's also some other -- basically
13 burned debris. Photo two is consistent except in the
14 fact that the materials shown, there's what appeared to
15 be a mattress, and a waste tire, were also intermingled
16 with the debris.

17 Q. If I could go back to photo one, some block, can
18 you describe better the type of block you're talking
19 about?

20 A. It's a type of block, and it's not a concrete
21 block, it's a little different type block, and I'm not
22 familiar with the exact make up of the block, but it
23 appears to be from a building.

24 Q. Whenever you're ready, you can continue to the

12

1 the next photo.

2 A. I'm sorry. Photos three and four, are photo
3 three is a picture taken at the north end facing south,
4 basically showing the lay of the area. You can somewhat
5 tell in the photo, the slope slopes down as you go
6 north, the material had been spread, into a low area, I
7 would presume to level it, shows again block, wood,
8 things of that nature that spread across. Photo four is
9 basically a close up of the ground in that area showing
10 a little better what type of waste is in there. There's
11 wood, block, dirt intermingled with blocks and just
12 different types of things in there, where it had been
13 intermingled with the debris from being pushed down.
14 Photo five again, is a close up, appears to be part of a
15 palate, indicates evidence of charring, as it had been
16 burnt. It did not look like it had been burnt on
17 property, from the sense that there was no charred
18 vegetation in the area amongst that. And photos six
19 through eight are taken mainly from the south, facing
20 the north-northwest, of the area that had been worked,
21 with heavy equipment. Again, showing kind of a
22 panoramic shot of the area of concern with the waste and
23 the dirt and the block and everything intermingled.

24 Q. The waste that you took photographs of on July 2,

13

1 2004, was that visible from the road when you approached
2 the property?

3 A. It was.

4 Q. These photographs accurately depict what you saw
5 on the site that day?

6 A. They do.

7 Q. When was this report generated?

8 A. Shortly after the time of the inspection, I don't
9 recall the contact date, but we typically file within
10 ten days.

11 Q. Does Illinois EPA keep documents such as
12 inspection reports and complainant photos in the regular
13 course of it's business?

14 A. We do.

15 MS. RYAN: At this time, I move Exhibits one
16 and two into evidence.

17 MR. BABB: No objection.

18 HEARING OFFICER WEBB: Exhibits one and two
19 are admitted into evidence.

20 MS. RYAN: And I have nothing else at this
21 time.

22 HEARING OFFICER WEBB: Mr. Babb?

23 MR. BABB: Thank you.

24 C R O S S E X A M I N A T I O N

14

1 By Mr. Babb:

2 Q. Mr. Johnson, when Mr. Rodley was out at the

3 scene, did he report to you that he saw any active
4 dumping going on at that time?

5 A. When I spoke to Brian Rodley, he said he did not
6 mention anything specific, that there was anything being
7 dumped actively at that moment.

8 Q. All right.

9 A. He just took photographs of the materials in
10 question.

11 Q. Very good. When you were out there on July the
12 2nd, and made your inspection, you did not see any
13 active dumping going on?

14 A. There was no one, other than Mr. Clapp from Perry
15 County, and myself, there was no one on site.

16 Q. And neither you nor Mr. Clapp, to the best of
17 your knowledge, saw any dumping going on on that site at
18 the time of your inspection?

19 A. There was nothing actively being dumped, there
20 was material that had been previously dumped on the
21 property.

22 Q. And in terms of when this material was dumped on
23 the property, based on your own inspection, you can't
24 give any kind of opinion as far as the date of when that

15

1 dumping was done?

2 A. Not with any specificity, no.

3 Q. And I think you indicated that it's your opinion
4 or your interpretation of these photographs, the first

5 set or earlier set compare to the second set, that the
6 debris that is pictured in the earlier set of
7 photographs appeared, by the time you got out there, to
8 have been spread around or be in a different
9 configuration. Do I understand your testimony
10 correctly?

11 A. I think it would be a fair assessment, yes.

12 Q. All right.

13 A. It appeared to have been leveled.

14 Q. By leveled, you're talking about the debris being
15 in a different configuration or occupying a different
16 footprint on the property?

17 A. I would say it that would be fair, yes.

18 Q. In terms of any type of change in the volume of
19 material that you observed on the property, did you
20 attempt to make any judgement as to whether from the
21 first time -- from when these first photographs were
22 taken, until you were out there personally, did you
23 attempt to quantify as to whether there was an increase
24 of the volume of material that was on the property?

16

1 A. With regard to specific volume, it would be
2 difficult, if not impossible without being an intrusive
3 investigation. I did not attempt to go through and go
4 to depth on everything and try to figure out the depth
5 of the waste. I used, for the calculations of the waste
6 on site, I used the length, the width of the area, and
7 then basically the depth at the maximum, and took that

8 basically in half, as an average of the depth.

9 Q. And so it would be certainly consistent, or not
10 inconsistent, with your observations that the amount of
11 waste that was on the property when Mr. Rodley was out
12 there was the same amount, or same volume as when you
13 were out there?

14 A. That's possible.

15 Q. You can't say one way or the other?

16 A. I can't say one way or the other, but that's
17 possible.

18 Q. And you certainly can't say with any degree of
19 certainty that the volume of waste that was out there on
20 the property when you were out there, was substantially
21 or any extent greater than when Mr. Rodley was out there
22 and took those photographs?

23 A. If I understand your question correctly, no, to
24 me, I can't say one way or the other that it was greater

17

1 or less, but I certainly wouldn't guess as it being
2 greater.

3 Q. But that would just be a guess on your part?

4 A. It would be.

5 MR. BABB: No other questions.

6 HEARING OFFICER WEBB: Ms. Ryan?

7 MS. RYAN: Nothing further.

8 HEARING OFFICER WEBB: Thank you very much,

9 Mr. Johnson.

10 MS. RYAN: I have no other witnesses.

11 HEARING OFFICER WEBB: Mr. Babb, you my call
12 your first witness.

13 MR. BABB: Thank you.

14 D I R E C T E X A M I N A T I O N

15 By Mr. Babb:

16 MR. BABB: I would call the respondent,
17 William Shrum.

18 (Witness Sworn.)

19 Q. Could you please state your name for us?

20 A. William Shrum.

21 Q. And Bill, what's your current address?

22 A. 6694 Shamrock Road.

23 Q. And where is your residence address in relation
24 to the property that we've been talking about during the

18

1 Pollution Board's case against you?

2 A. It's approximately a mile and a half up the road.

3 Q. All right. When did you first own that property?

4 A. I bought the property some time in early 2004.

5 Q. Okay. And at that time, did you buy just that
6 parcel, or was there more that you bought?

7 A. Well, at the time I didn't actually didn't
8 realize that this went with it, there was an eleven and
9 a half acre piece of property that I bought for rental
10 property to redo and fix up. This is a piece of
11 property that's separated from the main structure of the
12 property that I bought, and it being across the road on

13 two and a half acres.

14 Q. So it's separate from your other property, it's
15 separated by Shamrock Road?

16 A. Correct.

17 Q. Or Shamrock Lane?

18 A. Correct.

19 Q. And you're not initially from Perry County?

20 A. No, I'm not.

21 Q. You originally from Metro East area?

22 A. Yes, sir.

23 Q. Do you, based on your own personal knowledge, did
24 you have any information when you bought that property

19

1 what it's use had been before you bought it?

2 A. No, I did not.

3 Q. And when you say you bought that property in
4 2004, I take it was before the events that we've heard
5 about in June and July of 2004?

6 A. That's correct.

7 Q. You bought it some time earlier in the year?

8 A. That's correct.

9 Q. Did you have occasion following your purchase of
10 this property in 2004, to discover that there was some
11 kind of debris or refuse on the property?

12 A. Yes, I did.

13 Q. And approximately when did you make that
14 discovery?

15 A. When I had learned that the two and a half acres
16 was on the adjoining side of the road, this grassy area
17 that you see here was grown up quite high, I had taken a
18 brush hog over there and cut that down, and exposed the
19 debris or whatever you want to call it, that was there.

20 Q. So it's clear in the record for the Board, when
21 you're talking about the grassy area that shows the
22 refuge, that is the first photograph in what was
23 submitted by the Board as Exhibit No. 1?

24 A. That's correct.

20

1 Q. All right. So, describe for us, if you could,
2 what was the debris that you found?

3 A. It just looked like a bunch of piles of, I would
4 call it back fill rock, debris. There was some
5 construction debris, there was toilets, shingles,
6 mattresses. There was, you know, like home building,
7 some other home building debris there.

8 Q. And as the Board's attorney was -- EPA's attorney
9 was going through her evidence, you and I sat here going
10 through photographs, correct?

11 A. Correct.

12 Q. And in the photograph that Mr. Johnson indicated
13 as being taken by him in July of 2004, do those
14 photographs show the waste that you first observed on
15 the property when you became aware of this rubbish on
16 the property?

17 A. Yes.

18 Q. What did you do at that time when you discovered
19 this waste was on there?

20 A. Well, we wanted to level it off. I have a 655
21 John Deere high lift, I brought it down to the location
22 and there was like the toilet, anything, there was some
23 glass there, I cleaned up the glass and toiletry, most
24 of the -- anything that I didn't feel was in my eyes, a

21

1 back fill debris, I removed that debris, and then I took
2 the stuff that was there and I leveled it off.
3 Basically, there was a lower lying area on the end of
4 the property, and I just pushed it back and forth to
5 make it a level, clean area. I brought some dirt in to
6 back fill, just to dress it up, it was quite an eyesore,
7 and I wanted to cut the whole property, and you couldn't
8 cut it where this debris was at.

9 Q. What did you do with the debris that you removed
10 from the property?

11 A. I put it in a dumpster, at my home I have about a
12 ten yard dumpster that the trash people haul off, I put
13 it in there.

14 Q. And that's a dumpster that's provided to you as
15 part of a commercial service?

16 A. Yes.

17 Q. Then disposed of by other persons?

18 A. That's correct.

19 Q. And I'm sorry, could you describe for us what the

20 equipment was that you used?

21 A. It was a 655 John Deere high lift.

22 Q. All right, and is that on wheels or tracks?

23 A. It's on tracks.

24 Q. So that would leave in the area of which you

22

1 drove it, some tracks in the mud around that area?

2 A. Correct.

3 Q. Okay. Do the photographs that were introduced by
4 the EPA during it's case, showing the first time that
5 they had photographs taken out there, and then when
6 Mr. Johnson took the photographs, does that show the
7 work you did out there in terms of moving the rubbish
8 that was left on the property?

9 A. Yes, it does.

10 Q. Did you at any time ever add any rubbish or put
11 any kind of rubbish or waste on the property?

12 A. No, I had not.

13 Q. And in the time you've owned the property, have
14 you ever used that for any kind of dumping?

15 A. No, I have not.

16 MR. BABB: Those are all the questions I
17 have.

18 HEARING OFFICER WEBB: Ms. Ryan?

19 MS. RYAN: I don't have anything. Thank you.

20 HEARING OFFICER WEBB: Thank you, Mr. Shrum.

21 Mr. Babb, you may call your next witness.

22 MR. BABB: The next witness we want to call

23 is Keith Moss.

24 HEARING OFFICER WEBB: M-O-S-S.

23

1 MR. BABB: Yes, ma'am.

2 (Witness Sworn.)

3 D I R E C T E X A M I N A T I O N

4 By Mr. Babb:

5 Q. Would you state your name for us?

6 A. Keith Moss.

7 Q. And where do you currently reside?

8 A. 343 Hickory Creek Road, in Dubois, Illinois.

9 Q. And with respect to the property that we're
10 talking about in this hearing today, are you familiar
11 with that property?

12 A. Yes, I am.

13 Q. How are you familiar?

14 A. I used to work for Dan Kleiboecker, he used to
15 own the house that Bill purchased.

16 Q. All right.

17 A. And I'd done some construction work for him at
18 that time.

19 Q. What time period are we talking about here?

20 A. 2000 end of, 2001 beginning of.

21 Q. And is it your understanding that Mr. Kleiboecker
22 owned the property that's involved here?

23 A. At the time?

24 Q. Yes, sir.

1 A. Yes.

2 Q. Are you aware of duping of debris going on on
3 that property when Mr. Kleiboeker owned it?

4 A. Yes, I am.

5 Q. Tell us what happened, as far as that goes?

6 A. Well, they was building that house, and you
7 always got excess dry wall and buckets and lumber, and
8 whatever was left, he just threw in a dump truck 'til it
9 got full, I never seen who was driving the truck because
10 I was up on the roof, but you could see it all day long
11 going across the road there and dumping lumber. Didn't
12 look like anything toxic that I seen, like lumber,
13 drywall.

14 Q. Okay. That would include, since he was tearing
15 down a house, that would include things such as plumbing
16 fixtures?

17 A. Right.

18 Q. There was some furniture in the house?

19 A. Uh-huh.

20 Q. Would that also include things like household
21 furnishings, beds, mattresses, that type of things?

22 A. Anything that was in there he didn't want.

23 Q. From your vantage point, there on the roof
24 building the new house, you were able to observe this?

1 A. Yes, sir.

2 Q. Showing you the photographs that have been taken
3 here, and have been introduced by the agency in their
4 case, do those photographers appear to show the debris
5 which was deposited on the property by Mr. Kleiboeker
6 during the work?

7 A. Yes, all just miscellaneous stuff just like that.
8 A little bit of everything.

9 Q. Describe, if you would, the things that are shown
10 here that you recall being deposited on the property
11 during the time Mr. Kleiboeker owned it?

12 A. Cinder blocks, just some lumber, left over scrap.

13 Q. Okay.

14 A. Trash, you know, cans, bags. Everything he didn't
15 need at the time, I guess.

16 MR. BABB: Thank you. Those are all the
17 questions I have.

18 MS. RYAN: I don't have anything.

19 HEARING OFFICER WEBB: Thank you.

20 Mr. Babb, do you have any exhibits you'd
21 like to offer?

22 MR. BABB: I do not.

23 (Whereupon, a discussion was held off the
24 record.)

26

1 HEARING OFFICER WEBB: Back on the record.
2 We've just had an off the record discussion regarding
3 post hearing briefs. The transcript of these

4 proceedings will be available by December 1st, and will
5 be posted on the board's web site. The public comment
6 deadline is December 15, and public comment must be
7 filed in accordance with section 101.628 of the Board's
8 procedural rules. The complainant brief is due December
9 29, 2005. Respondent brief is due January 26, 2006, and
10 complainant's reply, if any, is due February 6, 2006.

11 Ms. Ryan, would you like to make a closing
12 argument?

13 MS. RYAN: No, I would like to reserve that
14 for my brief.

15 HEARING OFFICER WEBB: Mr. Babb, would you
16 like to make a closing argument?

17 MR. BABB: Also reserve for the brief.

18 HEARING OFFICER WEBB: Okay. Noting again
19 that there are no members of the public present to make
20 any comments, I will proceed to make a statement as to
21 the credibility of witnesses testifying during this
22 hearing.

23 Based on my legal judgement and experience,
24 I find all of the witnesses testifying to be credible.

27

1 At this time, I will conclude the proceedings, we stand
2 adjourned, and I thank all of you for your
3 participation.

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1 STATE OF ILLINOIS)

2 MARION COUNTY)

3

4

5 I, ANGIE R. KELLY, a Notary Public in and for the
6 County of Marion, State of Illinois, and St. Louis City,
7 State of Missouri, DO HEREBY CERTIFY that appeared
8 before me on November 17, 2005 at the offices of Perry

9 County Courthouse, Public Square, Pinckneyville,
10 Illinois, that a hearing by the Illinois Pollution
11 Control Board was held.

12 IN WITNESS WHEREOF, I have hereunto set my hand and
13 affixed my Notarial Seal this 17th day of November,
14 2005.

15

16

17

Angie R. Kelly

18

My Commission Expires September 27, 2009

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