

RECEIVED
CLERK'S OFFICE

APR 03 2006

STATE OF ILLINOIS
Pollution Control Board

INFORMATIONAL NOTICE !!!

ACC-34

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 James R. Thompson 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**.

Any person other than individuals **MUST** appear through an attorney-at-law licensed and registered to practice law. Individuals may appear on their own behalf, or through an attorney. 35 Ill. Adm. Code 101.400(a).

RECEIVED
CLERK'S OFFICE

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

APR 03 2006

ADMINISTRATIVE CITATION

STATE OF ILLINOIS
Pollution Control Board

ILLINOIS ENVIRONMENTAL)
 PROTECTION AGENCY,)
)
 Complainant,)
)
 v.)
)
 CLIFFORD LAWSON,)
)
 Respondent.)

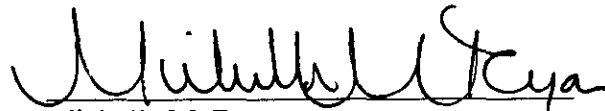
AC *06-34*
 (IEPA No. 73-06-AC)

NOTICE OF FILING

To: Clifford Lawson
 1086 Cordum Avenue
 Gillespie, IL 62033

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: March 31, 2006

RECEIVED
CLERK'S OFFICE
APR 03 2006
STATE OF ILLINOIS
Pollution Control Board

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD
ADMINISTRATIVE CITATION

ILLINOIS ENVIRONMENTAL
PROTECTION AGENCY,)

Complainant,)

v.)

CLIFFORD LAWSON,)

Respondent.)

AC *06-34*

(IEPA No. 73-06-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 (2004).

FACTS

1. That Clifford Lawson ("Respondent") is the present owner and operator of a facility located at 1086 Cordum Avenue, Henderson, Macoupin County, Illinois. The property is commonly known to the Illinois Environmental Protection Agency as Henderson/Lawson.
2. That said facility is an open dump operating without an Illinois Environmental Protection Agency Operating Permit and is designated with Site Code No. 1178055008.
3. That Respondent has owned and operated said facility at all times pertinent hereto.
4. That on February 17, 2006, Charlie King of the Illinois Environmental Protection Agency's Springfield Regional Office inspected the above-described facility. A copy of his inspection report setting forth the results of said inspection is attached hereto and made a part hereof.

VIOLATIONS

Based upon direct observations made by Charlie King during the course of his February 17, 2006 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) (2004).

- (2) That Respondent caused or allowed the open dumping of waste in a manner resulting in the 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) (2004).

CIVIL PENALTY

Pursuant to Section 42(b)(4-5) of the Act, 415 ILCS 5/42(b)(4-5) (2004), 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 May 15, 2006, 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 (2004), 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) (2004), 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 (2004). 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.


Douglas P. Scott, Director *fwc*
Illinois Environmental Protection Agency

Date: 3/31/06

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

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

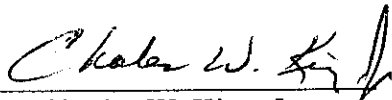
AFFIDAVIT

IN THE MATTER OF:)
)
Illinois Environmental)
Protection Agency)
)
vs.)
)
Clifford Lawson,)
)
Respondent.)

IEPA DOCKET NO.

Affiant, Charles W. King, Jr., being first duly sworn, voluntarily deposes and states as follows:

1. Affiant is a field inspector employed by the Division of Land Pollution Control/Field Operations Section of the Illinois Environmental Protection Agency and has been so employed at all times pertinent hereto.
2. On February 17, 2006 between 8:50 AM and 9:25 AM, Affiant conducted an inspection of a disposal site operated without an Illinois Environmental Protection Agency permit, located in Macoupin County, Illinois, and known as Henderson/Lawson by the Illinois Environmental Protection Agency. Said site has been assigned site code number LPC# 1178055008 by the Illinois Environmental Protection Agency.
3. Affiant inspected said Henderson/Lawson 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, Affiant completed the Inspection Report form attached hereto and made a part hereof, which, to the best of Affiant's knowledge and belief, is an accurate representation of Affiant's observations and factual conclusions with respect to said Henderson/Lawson open dump.


Charles W. King, Jr.

Subscribed and Sworn To before me
This 9th day of March, 2006



Notary Public



**ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
Open Dump Inspection Checklist**

County: Macoupin LPC#: 1178055008 Region: 5 - Springfield
 Location/Site Name: Henderson/Lawson
 Date: 02/17/2006 Time: From 0850 To 0925 Previous Inspection Date: 11/04/2005
 Inspector(s): Charlie King Weather: Sunny, cold, 17 deg. F., Winds NW @ 10mph
 No. of Photos Taken: # 10 Est. Amt. of Waste: 109 yds³ Samples Taken: Yes # No
 Interviewed: Clifford Lawson Complaint #:

Responsible Party
Mailing Address(es)
and Phone
Number(s):

Clifford Lawson
1086 Cordum Avenue
Gillespie, IL 62033
217/839-3810

James Gucciardo
Cahokia Township
Road Commissioner
21117 Sunset
Litchfield, IL 62056
217/839-2993

	SECTION	DESCRIPTION	VIOL
ILLINOIS ENVIRONMENTAL PROTECTION ACT REQUIREMENTS			
1.	9(a)	CAUSE, THREATEN OR ALLOW AIR POLLUTION IN ILLINOIS	<input checked="" type="checkbox"/>
2.	9(c)	CAUSE OR ALLOW OPEN BURNING	<input checked="" 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 AND REGULATIONS	<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 checked="" 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 # 1178055008

Inspection Date: 02/17/2006

	(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"/>
			<input type="checkbox"/>
			<input type="checkbox"/>
			<input type="checkbox"/>
			<input type="checkbox"/>
			<input type="checkbox"/>

Informational Notes

1. [Illinois] Environmental Protection Act: 415 ILCS 5/4.
2. Illinois Pollution Control Board: 35 Ill. Adm. Code, Subtitle G.
3. 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.
4. 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.
5. 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).
6. Items marked with an "NE" were not evaluated at the time of this inspection.

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

MEMORANDUM

DATE: March 8, 2006
TO: Land Division File
FROM: Charlie King, DLPC/FOS – Springfield Region
SUBJECT: LPC # 1178055008 – Macoupin County
Henderson/Lawson
FOS File

NARRATIVE RE-INSPECTION REPORT DOCUMENT

The purpose of this memorandum is to serve as the Narrative Re-Inspection Report Document on an inspection conducted at the subject site on February 17, 2006 from approximately 8:50 a.m. until 9:25 a.m., by this author. No one accompanied me on the re-inspection. The purpose of the re-inspection was to follow-up the initial site inspection conducted on November 4, 2005. That initial inspection was conducted because one of the respondents, Clifford Lawson, was caught in the act burning wire on his property by this investigator. An inspection was conducted and both Mr. Lawson, the property owner, and Cahokia Township, where much of the waste is located on a township road, were deemed the appropriate respondents at the site.

As mentioned in the original Narrative Inspection Report Document Memorandum to the Land Division File from this author, dated December 8, 2005, there was no initial outside complaint. This inspector was in the process of inspecting a property on a health department complaint across the street, when the resident respondent was observed setting wire on fire just south of Mine Street in a grassy area. Mine Street is small and unpaved in that area and could easily be mistaken as a separate driveway. This is because Henderson is an unincorporated town. However, the respondent was firm that it was not on his property and was partially on a continuation of Mine Street. Several old piles of wastes extended eastward on the road and past it where the road ends under the wastes. It is the belief of this inspector that respondent Lawson is indeed responsible for wastes on the township property, as someone else would have to pass by his home and go around two junk trucks that he has parked there, as well as other wastes of his that have been strung over the Mine Street road and right-of-way. That initial inspection resulted in the issuance of an Open Dump Administrative Citation Warning Notice issued to two respondents. One was issued to the property owner, Clifford Lawson and the other to Cahokia Township. Mr. Lawson never responded to the ACWN as required. The Township responded, alluded to the wastes being open dumped by Mr. Lawson, and requested our assistance in taking action against Mr. Lawson.

The original inspection report listed the name of the respondents, the location of the site, at 1086 Cordum Avenue, Henderson (mailing address is the same street address in Gillespie, IL 62033). Mr. Lawson's telephone number is 217/839-3810. Mr. James Gucciardo is the township road commissioner, 21117 Sunset, Litchfield, IL 62056. His telephone number is 217/839-2993. Information regarding the Quitclaim Deed, such as ownership and legal description was presented with the original site inspection report and will not be repeated herein. A copy of the Deed is in both the Division and DLPC/FOS – Springfield Region files.

Upon arrival at the site on the day of the re-inspection, the weather was sunny and cold with an air temperature of approximately 17° F., with northwesterly winds at approximately 10 mph. Surface soil conditions were frozen.

During the re-inspection, 10 digital photographs were taken with a digital camera. They show the conditions on the day of the re-inspection. From the digital photographs and a previous inspection report sketch, this author developed a computer-generated sketch of the site. It shows the approximate layout of the site, as well as the locations and directions of the re-inspection photos. The digital camera assigns a three-digit number to each photograph, i.e., 001, 002 and 003. This is how the numbers of the photographs are presented herein and in the Digital Photographs. To save space on the Site Sketch, real numbers have been used, i.e., 1, 2, etc. Copies of the Digital Photographs and the Site Sketch accompany this report.

The Digital Photographs that were taken on February 17, 2006 show wastes still present both on Mr. Lawson's property and on the adjacent Cahokia Township Mine Road and Mine Road right-of-way. The 10 photographs are described as follows:

Photo # 001 shows the site as seen from Mine Street, just east of the intersection with Cordum Avenue.

Photo # 002 shows a cluttered yard in the foreground and waste in the background. A wrecked Chevy S-10 pick-up truck has been placed on Mine Street, immediately south of Mr. Lawson's property. He admitted it was his truck and that he had recently wrecked it.

Photo # 003 shows a burned spot south of Mine Street, immediately south of Mr. Lawson's property, which measured 3' x 3'. This was an area where Mr. Lawson was caught burning wire during the initial site inspection. The burned wire had been removed.

Photo # 004 shows buckets of metals, some dumped on Mine Street, immediately south of Lawson's property. Mr. Lawson admitted that those buckets and the metals were his. The apparently inoperable old green Chevy truck in the background reportedly also belongs to Mr. Lawson.

Photo # 005 shows another burned spot, also approximately 3' x 3', in grass immediately south of Mine Street.

Photo # 006 shows the apparent junk truck that is the same shown in photo # 003 on Mine Street.

Photo # 007 shows waste metals, plastics and general household refuse to the north and east of the junk green Chevy pickup truck shown in photo #s 004 and 006.

Photo # 008 shows another burned spot on the ground.

Photo # 009 shows general household refuse, metals, paper, cardboard, plastics and glass, much of it burned, at the east end of Mine Street. The waste in the background has vegetation growing in it and appears very old. Some of the waste in the foreground is very recent.

Photo # 010 shows the pile of the recently placed waste, shown in the foreground of photo # 009. It is shown here from another angle, looking towards Mr. Lawson's property.

During the inspection, apparent violations of the Act and the regulations, Title 35, Illinois Administrative Code, Subtitle G (35 IAC) were observed. Those apparent violations of the Act, include Sections: 9(a), 9(c), 21(a), 21(d)(1), 21(d)(2), 21(e), 21(p)(1), 21(p)(3) and 21(p)(7). An apparent violation of the Act, Section 55(a)(1) that was alleged during the initial site inspection is no longer alleged, because waste tires were not observed during the re-inspection. Upon inquiry, Mr. Lawson stated that he put some of them in his garage and doesn't know what happened to the rest of them. There were only about 10 used tires observed during the initial site inspection. An apparent violation of the regulations, 35 IAC was Section 812.101(a). The Open Dump Inspection Checklist that accompanies this report provides additional information.

OTHER COMMENTS

1. Upon arrival at the site, Mr. Lawson came outside of his home to find out what I was doing. I told him I was re-inspecting the properties and asked why he had not responded to the ACWN. He told me that he didn't know he had too. I told him that his ACWN clearly states that he must respond in writing. He replied that he didn't read very good. I told him then he should have had someone else read it to him.

He was very adamant that wastes at the end of and around Mine Road were not his, and that it was township property and he did not dump wastes there. I told him that if someone else dumped there, they would have had to likely go past his house. I asked why he would think that someone else would dump waste so close to his house. He said he didn't know but it wasn't his. However, when I asked who owned the two junk trucks on Mine road, next to his house, and who owned the metal dumped from the five-gallon buckets that were there, he stated that those were his.

2. No one else approached me during the inspection.

CK

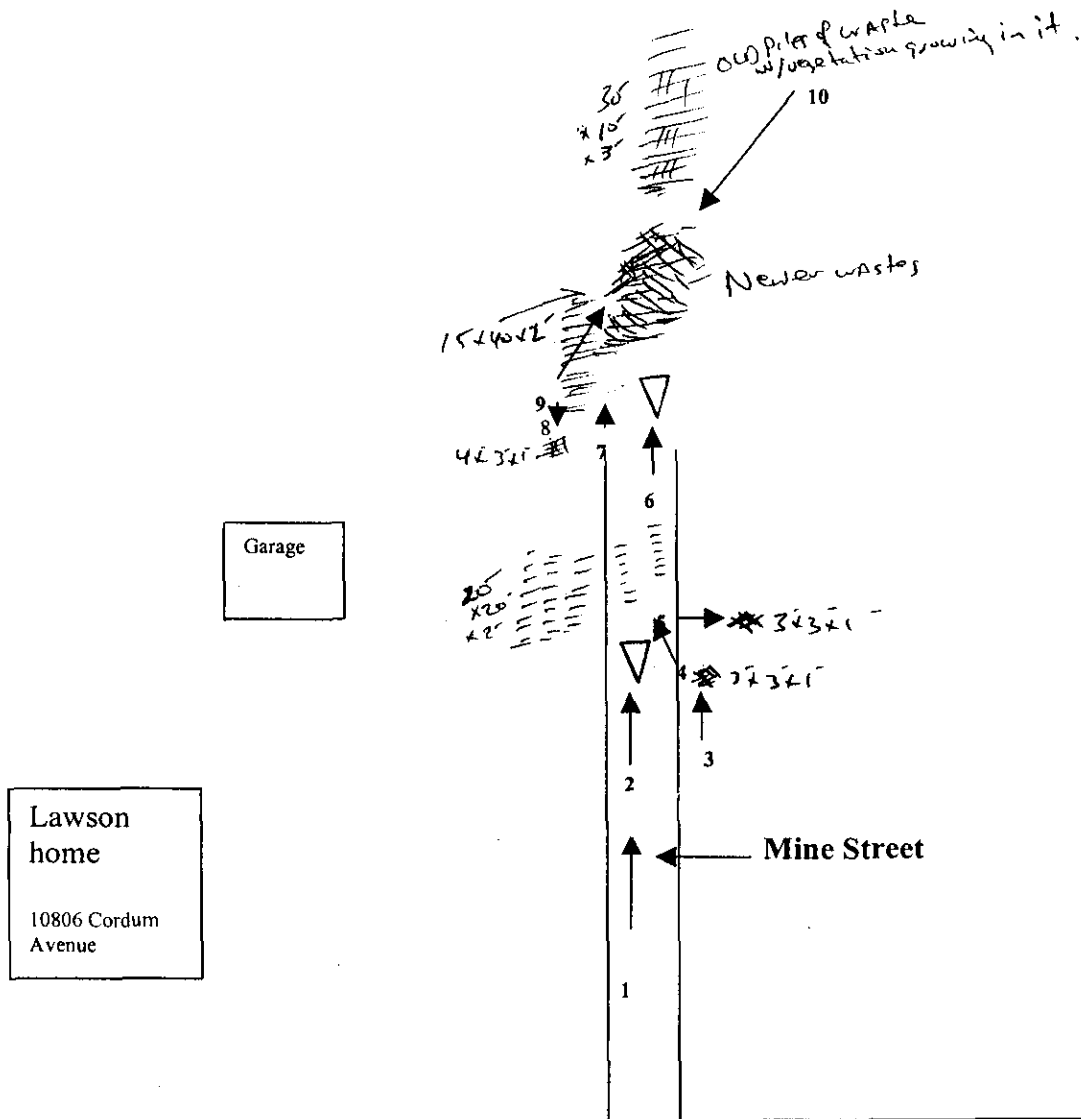
cc: DLPC/FOS – Springfield Region
Macoupin County, Cahokia Township Road Commissioner, James Gucciardo
Verticchio & Verticchio, Attorneys at Law, Rick Verticchio

SITE SKETCH

Site name: Henderson/Lawson
LPC #: 1178055008
Inspector: Charlie King

County: Macoupin
Date: February 17, 2006
Time: 8:50 a.m. - 9:25 a.m.

A digital camera was used for the Inspection photos. Distances are approximate - Not drawn to scale



Cordum Avenue

LEGEND

- 2 → - Denotes location and direction of photo.
- △ - Junk vehicle
- ≡ - Open dumping
- ≡ - Open Burning

N ←



DIGITAL PHOTOGRAPHS



Date: February 17, 2006
Time: 9:06 a.m.
Direction: E
Photo by: Charlie King
Exposure #: 001
Comments: The site as seen from Mine Street, just east of the intersection with Cordum Avenue.

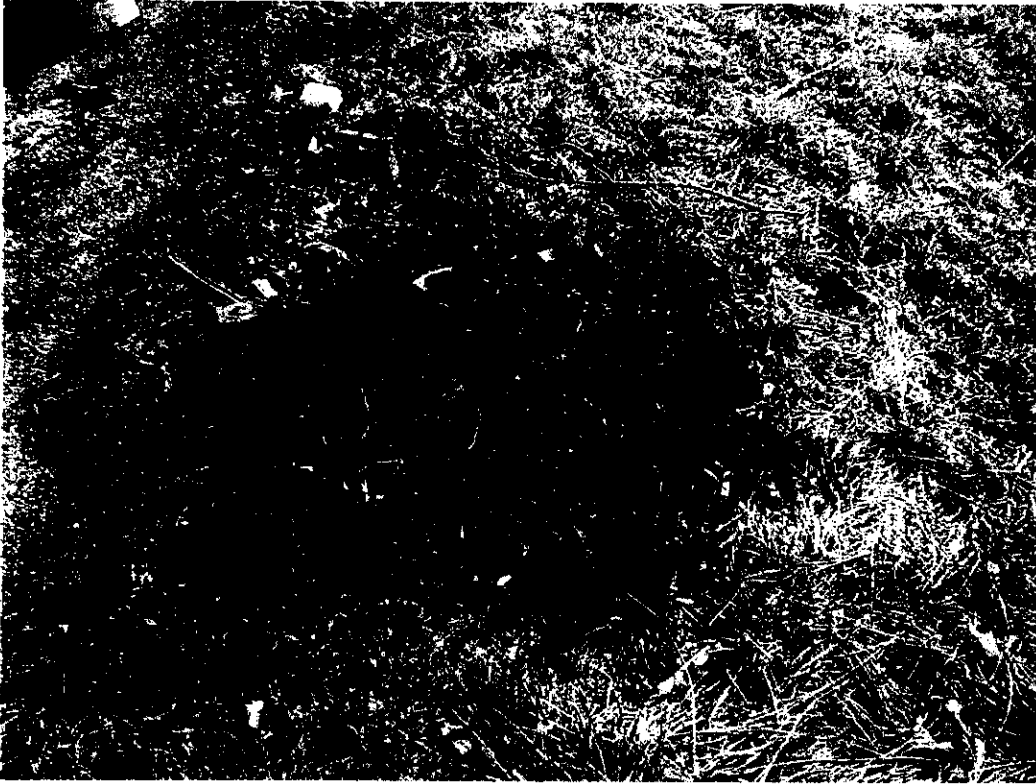


Date: February 17, 2006
Time: 9:13 a.m.
Direction: E
Photo by: Charlie King
Exposure #: 002
Comments: A cluttered yard in the foreground and waste in the background. A wrecked Chevy S-10 pick-up truck has been placed on Mine Street, immediately south of Mr. Lawson's property. He admitted it was his truck and that he had recently wrecked it.

File Names: 0178055008~02172006-[Exp. #].jpg



DIGITAL PHOTOGRAPHS



Date: February 17, 2006
Time: 9:14 a.m.
Direction: E
Photo by: Charlie King
Exposure #: 003
Comments: A burned spot south of Mine Street, immediately south of Mr. Lawson's property, measured 3' x 3'. This was an area where Mr. Lawson was caught burning wire during the initial site inspection. The burned wire had been removed.

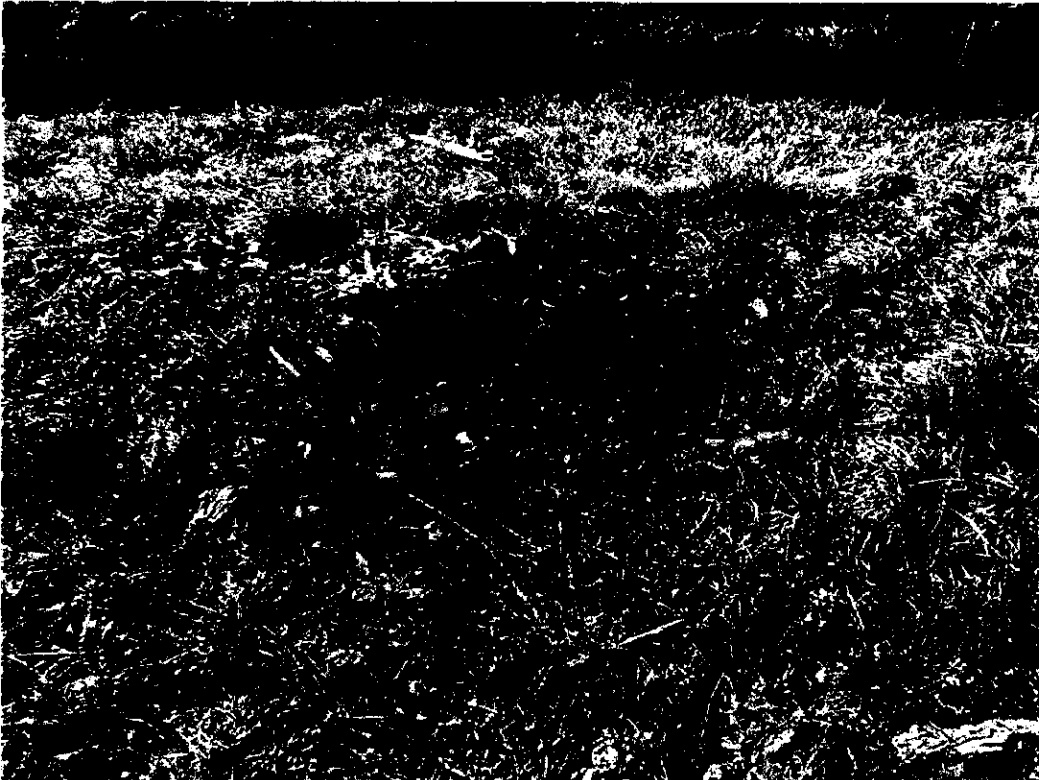


Date: February 17, 2006
Time: 9:14 a.m.
Direction: NE
Photo by: Charlie King
Exposure #: 004
Comments: Buckets of metals, some dumped on Mine Street, immediately south of Lawson's property. Mr. Lawson admitted that those buckets and the metals were his. The apparently inoperable old green Chevy truck in the background reportedly also belongs to Mr. Lawson.

File Names: 0178055008~02172006-[Exp. #].jpg



DIGITAL PHOTOGRAPHS



Date: February 17, 2006
Time: 9:15 a.m.
Direction: S
Photo by: Charlie King
Exposure #: 005
Comments: Another
burned spot, also
approximately 3' x 3',
in grass immediately
south of Mine Street.



Date: February 17, 2006
Time: 9:17 a.m.
Direction: E
Photo by: Charlie King
Exposure #: 006
Comments: The
apparent junk truck is
the same shown in
photo # 003 on Mine
Street.

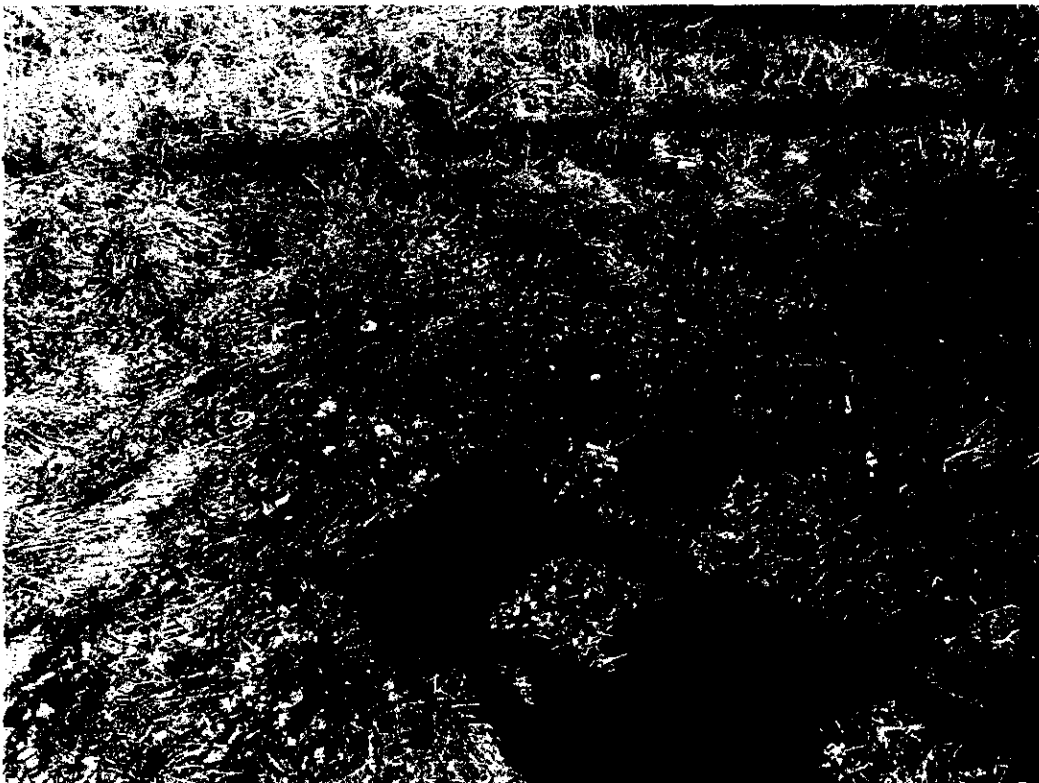
File Names: 0178055008~02172006-[Exp. #].jpg



DIGITAL PHOTOGRAPHS



Date: February 17, 2006
Time: 9:17 a.m.
Direction: E
Photo by: Charlie King
Exposure #: 007
Comments: Waste metals, plastics and general household refuse are shown to the north and east of the junk green Chevy pickup truck shown in photo #s 004 and 006.



Date: February 17, 2006
Time: 9:18 a.m.
Direction: W
Photo by: Charlie King
Exposure #: 008
Comments: Another burned spot on the ground.

File Names: 0178055008~02172006-[Exp. #].jpg



DIGITAL PHOTOGRAPHS



Date: February 17, 2006
Time: 9:19 a.m.
Direction: SE
Photo by: Charlie King
Exposure #: 009
Comments: General household refuse, metals, paper, cardboard, plastics and glass, much of it burned, at the east end of Mine Street. The waste is the background has vegetation growing in it and appears very old. Some of the waste in the foreground is very recent.



Date: February 17, 2006
Time: 9:20 a.m.
Direction: NW
Photo by: Charlie King
Exposure #: 010
Comments: The pile of the recently placed waste, shown in the foreground of photo # 009, is shown here from another angle, looking towards Mr. Lawson's property.

File Names: 0178055008~02172006-[Exp. #].jpg

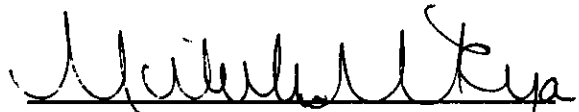
PROOF OF SERVICE

I hereby certify that I did on the 31st day of March 2006, 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: Clifford Lawson
1086 Cordum Avenue
Gillespie, IL 62033

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