

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

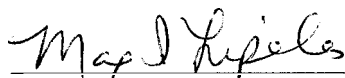
AMERICAN BOTTOM CONSERVANCY)	
)	
Petitioner)	
)	
v.)	
)	PCB 06-171
ILLINOIS ENVIRONMENTAL PROTECTION)	(NPDES Permit Appeal)
AGENCY and UNITED STATES STEEL)	
CORPORATION - GRANITE CITY WORKS)	
)	
Respondents)	

NOTICE OF FILING

PLEASE TAKE NOTICE that on June 21,2006, I filed with the Office of the Clerk of the Pollution Control Board the following documents:

- 1) MOTION FOR PRO HAC VICE ADMISSION OF EDWARD J. HEISEL;
- 2) ENTRY OF APPEARANCE BY EDWARD J. HEISEL; AND
- 3) DESIGNATION OF LEAD ATTORNEY

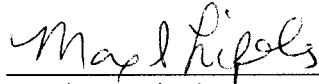
I filed the above document electronically with the Clerk of the Pollution Control Board and with Carol Webb, Hearing Officer, at webbc@ipcb.state.il.us. In addition, I served copies of the foregoing electronically upon Sanjay K. Sofat, counsel for respondent Illinois Environmental Protection Agency, at Sanjay.Sofat@epa.state.il.us, and Erika K. Powers, counsel for respondent United States Steel Corporation – Granite City Works, at epowers@btlaw.com.



Maxine I. Lipeles, Pro Hac Vice
Counsel for Petitioner
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(314) 935-5837 (phone); (314) 935-5171 (fax)
milipele@wulaw.wustl.edu

Certificate of Service

I, Maxine I. Lipeles, certify that on June 21, 2006, I filed 1) MOTION FOR PRO HAC VICE ADMISSION OF EDWARD J. HEISEL; 2) ENTRY OF APPEARANCE OF EDWARD J. HEISEL; AND 3) DESIGNATION OF LEAD ATTORNEY electronically with the Clerk of the Pollution Control Board and with Carol Webb, Hearing Officer, at webbc@ipcb.state.il.us. In addition, I served copies of the foregoing electronically upon Sanjay K. Sofat, counsel for respondent Illinois Environmental Protection Agency, at Sanjay.Sofat@epa.state.il.us, and Erika K. Powers, counsel for respondent United States Steel Corporation – Granite City Works, at epowers@btlaw.com.



Maxine I. Lipeles
Counsel for Petitioner

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MOTION FOR PRO HAC VICE ADMISSION OF EDWARD J. HEISEL

Pursuant to 35 Ill. Adm. Code § 101.400(a)(3), I, Edward J. Heisel, respectfully request that the Illinois Pollution Control Board authorize me to appear *pro hac vice* in the above-captioned matter on behalf of petitioner American Bottom Conservancy. The grounds for this motion are as follows:

1. I am a licensed attorney in the State of Missouri, where I was admitted to the practice of law April 21, 2000. My attorney registration number in Missouri is 51746, and I am in good standing.

2. I was admitted to the California bar on December 9, 1997. Due to my current residence in Missouri and the fact that I no longer practice in California, I voluntarily resigned my California law license as of May 13, 2006.

3. I am a member in good standing of the bars of the following federal courts: U.S. Court of Appeals for the Eighth Circuit (admitted June 12, 2000); U.S. Court of Appeals for the Ninth Circuit (January 7, 1998); U.S. District Court for the Eastern District of Missouri (April 21, 2000); U.S. District Court for the Western District of Missouri (April 28, 2000); U.S. District Court for the Southern District of California

(June 26, 1998); U.S. District Court for the Central District of California (June 29, 1998);
U.S. District Court for the Eastern District of California (June 25, 1998).

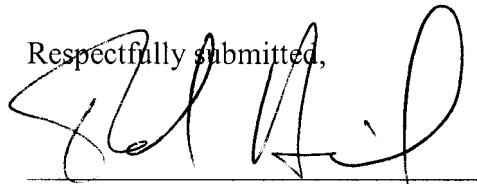
4. No disciplinary proceedings are pending or have been brought against me.
5. I have never been disbarred or subject to disbarment proceedings.
6. Petitioner American Bottom Conservancy is represented by the Interdisciplinary Environmental Clinic at Washington University School of Law. I am a staff attorney at the Clinic.

7. I am familiar with the provisions of the Illinois Code of Civil Procedure, the Illinois Supreme Court Rules, and the Rules of the Illinois Pollution Control Board and I understand and agree to be bound by them in all proceedings before the Illinois Pollution Control Board.

8. With the Board's permission, attached is my Entry of Appearance in this matter

Wherefore, I, Edward J. Heisel, respectfully request permission to appear *pro hac vice* on behalf of petitioner American Bottom Conservancy.

Respectfully submitted,

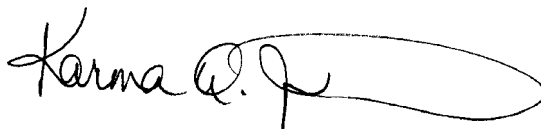


Edward J. Heisel
Interdisciplinary Environmental Clinic
Washington University School of Law
One Brookings Drive – Campus Box 1120
St. Louis, MO 63130-4899
314.935.8760

Dated: June 21, 2006

Subscribed and Sworn to before me this 21st day of June, 2006

City, State, Zip: St. Louis, MO 63130



KARMA Q. JENKINS
Notary Public, Notary Seal
State of Missouri, St. Louis County
My Commission Expires 07/29/2007

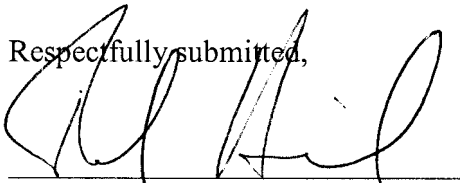
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ENTRY OF APPEARANCE OF EDWARD J. HEISEL

I hereby enter my appearance in the above-captioned proceeding, on behalf of petitioner American Bottom Conservancy.

Respectfully submitted,



Edward J. Heisel, Pro Hac Vice
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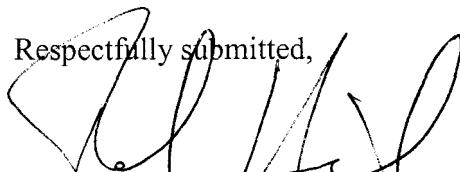
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DESIGNATION OF LEAD ATTORNEY

Pursuant to 35 Ill. Adm. Code § 101.400(a)(4), Edward J. Heisel is designated lead attorney in the above captioned proceeding for purposes of phone and mail contact.

Respectfully submitted,



Edward J. Heisel, Pro Hac Vice
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