BEFORE	THE	ILLINOIS	POLLUTION	CONTROI	
ILLINOIS ENVIRONME PROTECTION AGENCY,	NTAL		}		SEP 0 6 2006
Complainant,) AC (04-51	STATE OF ILLINOIS Pollution Control Board
V .) (IEPA	A NO. 8	33-04-AC)
MICHEAL MORETON			}		
Respondent.))		

POST-HEARING BREEF OF RESPONDENT

The respondent, not being trained in law, and unable to afford legal counsel, will use layman logic to defend the charges.

The complaintants witness testified he had made a previos trip to this site, and observed a recycling operation in progess An the inspection of February 23, 2004, he observed mobile homes that he assumed were abandend, but failed to check at the coles county courthouse to see if the paper work was done tolegally store them. He t hem observed a stove and a small pile of multy -colored items, but failed to bend over and pick one up to see whither it was plastic or metal HeHthenobsevered piles of what he called construtio deb. but from a previous visit, he know it was pitwash and that it was there fora specific purpose. Pit weah is a bi product of a concrete operation, never been previosly used, never been used in a road, never been a concrete block, never been any part of a building, it is a new material until it is used the first time. It is also recycleable. He observed a mobile home in the process of being dismanteld for recycling, and apile of wood that is a bi product of the recycling process, as are tires from recycling cars. The 255 tires he estimated that were on the property, would be less than 60 recycled cars, and from his pictures, all but appoximatey 30 were in or on containers, and all but about 30 were still on the

rims waiting for more recycling. The wheel steel and even the tires are recycleable material. He then took pictures of 2- 55 gallon barrels and from aprevious visit knew it was hydralic oil from a care crusher, and a n accidental spill resulting from a repair, it has since been cleaned up and disposed of.

In all the complaintants witness contered all of his charges. He acknowleged that respondent was licesed by the secretary of state at that location. Thaty from previous visit he knew and even observed respondent in the process of recycling.

And finally, he knew that a problem existed between respondant and a deputy sherriff, and nowa an ajacent land owmer, using the power of his office to financally hurt me. There are laws to protect people from this. If they don't want me there, they should take me in fromt of a judge in coles county, not thru the secrery of state or the pollution control board.

Rspectfully submitted,

Mulal Mal

MICHEAL L. MORETON