

**BEFORE THE ILLINOIS POLLUTION CONTROL BOARD**

PEOPLE OF THE STATE OF ILLINOIS, )

Complainant, )

v. )

QUANTUM COLOR GRAPHICS, L.L.C., an )  
Illinois limited liability company, )

Respondent. )

PCB No. 06-35

(Enforcement-Air)


**NOTICE OF FILING**

TO: See attached service list (VIA ELECTRONIC FILING)

PLEASE TAKE NOTICE that today I have electronically filed with the Office of the Clerk of the Pollution Control Board a Motion to Request Relief from Hearing, and a Stipulation and Proposal for Settlement as to Respondent Quantum Color Graphics, LLC, a copy of which is attached and hereby served upon you.

Respectfully submitted,

PEOPLE OF THE STATE OF ILLINOIS,  
LISA MADIGAN,  
Attorney General of the State of Illinois

By:   
KATHERINE M. HAUSRATH  
Assistant Attorney General  
Environmental Bureau  
188 W. Randolph St., 20th Floor  
Chicago, Illinois 60601  
(312) 814-0660

**SERVICE LIST**

Mr. Robert M. Baratta, Jr.  
Freeborn & Peters  
311 South Wacker Drive, Suite 3000  
Chicago, IL 60606-6677

Mr. Howard A. Balikov  
555 Skokie Blvd.  
Suite 400  
Northbrook, IL 60062

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

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**MOTION TO REQUEST RELIEF**  
**FROM HEARING REQUIREMENT**

NOW COMES the Complainant, PEOPLE OF THE STATE OF ILLINOIS, by LISA MADIGAN, Attorney General of the State of Illinois, and requests relief from the hearing requirement in the above-captioned matter. In support thereof, the Complainant states as follows:

1. On September 6, 2005, the Complaint was accepted for hearing by the Pollution Control Board ("Board") in this matter. On September 11, 2006, a Stipulation and Proposal for Settlement with Respondent Quantum Color Graphics, LLC was filed with the Board. If accepted, the Stipulation and Proposal for Settlement will dispose of the case.
2. Section 31(c)(2) of the Illinois Environmental Protection Act ("Act"), 415 ILCS 5/31(c)(2) (2004), allows the parties in certain enforcement cases to request relief

from the mandatory hearing requirement where the parties have submitted to the Board a stipulation and proposal for settlement. Section 31(c)(2) provides:

Notwithstanding the provisions of subdivision (1) of this subsection (c), whenever a complaint has been filed on behalf of the Agency or by the People of the State of Illinois, the parties may file with the Board a stipulation and proposal for settlement accompanied by a request for relief from the requirement of a hearing pursuant to subdivision (1). Unless the Board, in its discretion, concludes that a hearing will be held, the Board shall cause notice of the stipulation, proposal and request for relief to be published and sent in the same manner as is required for hearing pursuant to subdivision (1) of this subsection. The notice shall include a statement that any person may file a written demand for hearing within 21 days after receiving the notice. If any person files a timely written demand for hearing, the Board shall deny the request for relief from a hearing and shall hold a hearing in accordance with the provisions of subdivision (1).

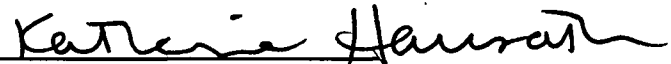
3. No hearing is currently scheduled in the instant case.

4. Both parties agree that a hearing on the Stipulation and Proposal for Settlement is not necessary, and respectfully request relief from such hearing as allowed by Section 31(c)(2) of the Act, 415 ILCS 5/31(c)(2) (2004).

WHEREFORE, the Complainant, PEOPLE OF THE STATE OF ILLINOIS, by LISA MADIGAN, Attorney General of the State of Illinois, respectfully requests that the Board grant this motion for relief from the hearing requirement set forth in Section 31(c)(1) of the Act, 415 ILCS 5/31(c)(1) (2004).

Respectfully submitted,

PEOPLE OF THE STATE OF ILLINOIS,  
LISA MADIGAN,  
Attorney General of the State of Illinois

By:   
KATHERINE M. HAUSRATH  
Assistant Attorney General  
Environmental Bureau  
188 W. Randolph St., 20th Floor

Chicago, Illinois 60601  
(312) 814-0660

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	)	
Respondent.	)	

**STIPULATION AND PROPOSAL FOR SETTLEMENT**

Complainant, PEOPLE OF THE STATE OF ILLINOIS, by LISA MADIGAN, Attorney General of the State of Illinois, the Illinois Environmental Protection Agency ("Illinois EPA"), and QUANTUM COLOR GRAPHICS, L.L.C. ("Respondent" or "Quantum"), have agreed to the making of this Stipulation and Proposal for Settlement ("Stipulation") and submit it to the Illinois Pollution Control Board ("Board") for approval. The parties agree that the statement of facts contained herein represents a fair summary of the evidence and testimony which would be introduced by the parties if a hearing were held. The parties further stipulate that this statement of facts is made and agreed upon for purposes of settlement only and that neither the fact that a party has entered into this Stipulation, nor any of the facts stipulated herein, shall be introduced into evidence in any other proceeding regarding the claims asserted in the Complaint except as otherwise provided herein. If the Board approves and enters this Stipulation, Respondent agrees

to be bound by the Stipulation and Board Order and not to contest their validity in any subsequent proceeding to implement or enforce their terms.

### **I. JURISDICTION**

The Board has jurisdiction of the subject matter herein and of the parties consenting hereto pursuant to the Illinois Environmental Protection Act ("Act"), 415 ILCS 5/1 *et seq.* (2004).

### **II. AUTHORIZATION**

The undersigned representatives for each party certify that they are fully authorized by the party whom they represent to enter into the terms and conditions of this Stipulation and to legally bind them to it.

### **III. STATEMENT OF FACTS**

#### **A. Parties**

1. On September 6, 2005, a Complaint was filed on behalf of the People of the State of Illinois by Lisa Madigan, Attorney General of the State of Illinois, on her own motion and upon the request of the Illinois EPA, pursuant to Section 31 of the Act, 415 ILCS 5/31(2004), against the Respondent, Quantum.

2. The Illinois EPA is an administrative agency of the State of Illinois, created pursuant to Section 4 of the Act, 415 ILCS 5/4 (2004).

3. At all times relevant to this Stipulation, Respondent, Quantum, was and is an Illinois limited liability company in good standing.

**B. Site Description**

1. At all times relevant to this Stipulation, Respondent owned and operated a printing facility located at 6511 West Oakton Street, Morton Grove, Cook County, Illinois ("Facility"). The emissions sources at the Facility include four lithographic printing presses.

2. In 1985, Quantum constructed and began operation of lithographic printing press #240-1 ("Press 1"). Operation of Press 1 was discontinued in May of 1998. In June of 1994, Quantum constructed and began operation of lithographic printing press #640-4 ("Press 4"). Operation of Press 4 was discontinued in July of 2004. In September of 1997, Quantum constructed and began operation of lithographic printing press #640-2 ("Press 2"), and lithographic printing press #640-3 LYL ("Press 3"). In May of 1998, Quantum constructed and began operation of lithographic printing press #540-5 ("Press 5"). In August of 2004, Quantum constructed and began operation of lithographic printing press #840-4 ("Press 6"). As of the time of the filing of the complaint in this matter, Press 2, Press 3, Press 5 and Press 6 were still in operation.

3. The construction of Press 2 and Press 3 in 1997 increased Quantum's potential to emit ("PTE") to greater than twenty-five tons per year of volatile organic matter.

**C. Allegations of Non-Compliance**



Complainant contends that Quantum has violated the following provisions of the Act and Board regulations:

- Count I:**        Constructing Emission Sources Without a Permit  
Violation of Section 9(b) of the Act, 415 ILCS 5/9(b) (2004), and Section 201.142 of the Board Air Pollution Regulations, 35 Ill. Adm. Code 201.142.
- Count II:**        Operating Emission Sources Without a Permit  
Violation of Section 9(b) of the Act, 415 ILCS 5/9(b) (2004), and Section 201.143 of the Board Air Pollution Regulations, 35 Ill. Adm. Code 201.143.
- Count III:**       Failure to Obtain a CAAPP Permit for a Major Source  
Violation of Section 39.5(6)(b) of the Act, 415 ILCS 5/39.5(6)(b) (2004).
- Count IV:**        Failure to Comply with New Source Review Requirements  
Violation of Section 9(a) of the Act, 415 ILCS 5/9(a) (2004), and Section 203.201 of the Board Air Pollution Regulations, 35 Ill. Adm. Code 203.201.
- Count V:**         Failure to Submit Certification  
Violation of Section 9(a) of the Act, 415 ILCS 5/9(a) (2004), and Sections 218.411(a)(1)(A) and (c)(1) of the Board Air Pollution Regulations, 35 Ill. Adm. Code 218.411(a)(1)(A) and (c)(1).
- Count VI:**        Failure to Keep Records  
Violation of Section 9(a) of the Act, 415 ILCS 5/9(a) (2004), and Section 218.411(c)(2) of the Board Air Pollution Regulations, 35 Ill. Adm. Code 218.411(c)(2).
- Count VII:**       Failure to Submit a Fugitive Dust Plan  
Violation of Section 9(a) of the Act, 415 ILCS 5/9(a) (2004), and Section 212.309(a) of the Board Air Pollution Regulations, 35 Ill. Adm. Code 212.309(a).
- Count VII:**       Failure to Submit Annual Emission Reports  
Violation of Section 9(a) of the Act, ILCS 5/9(a) (2004), and Sections 201.302(a) of the Board Air Pollution Regulations, 35 Ill. Adm. Code 201.302(a).

**D. Non-Admission of Violations**

The Respondent represents that it has entered into this Stipulation for the purpose of settling and compromising disputed claims without having to incur the expense of contested litigation. By entering into this Stipulation and complying with its terms, the Respondent does not affirmatively admit the allegations of violation within the Complaint and referenced within Section III.C herein, and this Stipulation shall not be interpreted as including such admission.

**E. Compliance Activities to Date**

1. On June 16, 2004, the Illinois EPA received Quantum's Clean Air Act Permit Program ("CAAPP") permit application. The CAAPP permit application is currently pending with the Illinois EPA, but has not yet been issued.

2. In October, 2004, Quantum began to keep records concerning its lithographic printing operations, submitted a fugitive dust plan to the Illinois EPA, and submitted the annual emissions reports accurately documenting all Facility emissions for 1997 to 2003.

**IV. APPLICABILITY**

This Stipulation shall apply to and be binding upon the Complainant and Quantum, and any officer, director, agent, or employee of Quantum, as well as any successors or assigns of Quantum. Quantum shall not raise as a defense to any enforcement action taken pursuant to this Stipulation the failure of any of its officers, directors, agents, employees or successors or assigns to take such action as shall be required to comply with the provisions of this Stipulation.

## **V. COMPLIANCE WITH OTHER LAWS AND REGULATIONS**

This Stipulation in no way affects the responsibilities of Quantum to comply with any other federal, state or local laws or regulations including, but not limited to, the Act and the Board regulations, 35 Ill. Adm. Code, Subtitles A through H.

## **VI. IMPACT ON THE PUBLIC RESULTING FROM ALLEGED NON-COMPLIANCE**

Section 33(c) of the Act, 415 ILCS 5/33(c)(2004), provides as follows:

In making its orders and determinations, the Board shall take into consideration all the facts and circumstances bearing upon the reasonableness of the emissions, discharges, or deposits involved including, but not limited to:

1. the character and degree of injury to, or interference with the protection of the health, general welfare and physical property of the people;
2. the social and economic value of the pollution source;
3. the suitability or unsuitability of the pollution source to the area in which it is located, including the question of priority of location in the area involved;
4. the technical practicability and economic reasonableness of reducing or eliminating the emissions, discharges or deposits resulting from such pollution source; and
5. any subsequent compliance.

In response to these factors, the parties state the following:

1. The Illinois EPA's information gathering responsibilities were hindered by Quantum's construction and operation of the six emission units without the proper permits,

operation without submission of a CAAPP permit from 1997 to 2004, failure to comply with New Source Review requirements, failure to timely file and keep required reports and records, and failure to file a fugitive dust plan.

2. The Facility has a social and economic benefit.
  3. Operation of the printing Facility is suitable for the area in which it is located.
  4. Obtaining permits prior to construction and operation of the emission units at the Facility, timely filing and keeping required reports and certifications, complying with the New Source Review requirements, and filing a fugitive dust plan were all technically practicable and economically reasonable.
  5. Respondent has committed to comply with the Act and the Board Regulations.
- Respondent will be in full compliance upon issuance of its CAAPP permit.

## **VII. CONSIDERATION OF SECTION 42(h) FACTORS**

Section 42(h) of the Act, 415 ILCS 5/42(h)(2004), provides as follows:

In determining the appropriate civil penalty to be imposed under . . . this Section, the Board is authorized to consider any matters of record in mitigation or aggravation of penalty, including but not limited to the following factors:

1. the duration and gravity of the violation;
2. the presence or absence of due diligence on the part of the respondent in attempting to comply with requirements of this Act and regulations thereunder or to secure relief therefrom as provided by this Act;
3. any economic benefits accrued by the respondent because of delay in compliance with requirements, in which case the economic benefits shall be determined by the lowest cost alternative for achieving compliance;

4. the amount of monetary penalty which will serve to deter further violations by the respondent and to otherwise aid in enhancing voluntary compliance with this Act by the respondent and other persons similarly subject to the Act;
5. the number, proximity in time, and gravity of previously adjudicated violations of this Act by the respondent;
6. whether the respondent voluntarily self-disclosed, in accordance with subsection i of this Section, the non-compliance to the Agency; and
7. whether the respondent has agreed to undertake a "supplemental environmental project," which means an environmentally beneficial project that a respondent agrees to undertake in settlement of an enforcement action brought under this Act, but which the respondent is not otherwise legally required to perform.

In response to these factors, the parties state as follows:

1. Plaintiff alleges that Quantum failed to obtain a permit for construction of at least six emission units and has operated some or all of those emission units for a period of eighteen years without an operating permit. Plaintiff alleges Quantum also constructed a major source without demonstrating compliance with the Board's New Source Review regulations. Plaintiff alleges Quantum operated from 1997 to June 16, 2004 without submitting a CAAPP permit application. From March 15, 1996 through October 2004, Plaintiff alleges Quantum failed to keep records concerning its lithographic printing operations and failed to submit certifications of compliance with the Board's lithographic printing regulations. Plaintiff alleges from 1996 through October 13, 2004, Quantum failed to submit a fugitive dust plan to the Illinois EPA. Plaintiff alleges for calendar years 1997 through 2003, Quantum failed to submit to the Illinois EPA annual emissions reports accurately documenting all Facility emissions.

2. Quantum was diligent in attempting to come back into compliance with the Act, Board regulations and applicable federal regulations, once Quantum became aware of the full extent of its noncompliance. In 2004, Quantum informed the Illinois EPA that it believed it needed a CAAPP permit, and asked to meet with the Illinois EPA in order to resolve any outstanding violations. In October, 2004, Quantum began to keep records concerning its lithographic printing operations, submitted a fugitive dust plan to the Illinois EPA, and submitted the annual emissions reports for 1997 to 2003

3. The economic benefit of noncompliance to Quantum is calculated at \$12,725.00. This amount represents avoided construction and operating permit fees from 1986 through 2003.

4. Complainant has determined, based upon the specific facts of this matter, that a penalty of Forty-Four Thousand Dollars (\$44,000.00), which represents Twelve Thousand Seven Hundred Twenty-Five Dollars (\$12,725.00) in recovered economic benefit, and Thirty-One Thousand Two Hundred Seventy-Five Dollars (\$31,275.00) in penalties, will serve to deter further violations and aid in future voluntary compliance with the Act and Board regulations.

5. To Complainant's knowledge, Quantum has no previously adjudicated violations of the Act.

6. Self-disclosure in accordance with Section 42(i) of the Act, 415 ILCS 5/42(i) (2004), is not at issue in this matter.

7. The settlement of this matter does not include a supplemental environmental project.

## **VIII. TERMS OF SETTLEMENT**

### **A. Penalty Payment**

1. Quantum shall pay a civil penalty in the sum of Forty-Four Thousand Dollars (\$44,000.00) within thirty (30) days from the date the Board adopts and accepts this Stipulation. Quantum stipulates that payment has been tendered to Quantum's attorney of record in this matter in a form acceptable to that attorney. Further, Quantum stipulates that said attorney has been directed to make the penalty payment on behalf of Quantum, within thirty (30) days from the date the Board adopts and accepts this Stipulation, in a manner prescribed below. The amount of Thirty-One Thousand Two Hundred Seventy-Five Dollars (\$31,275.00) shall be paid by certified check, money order or electronic funds transfer payable to the Illinois EPA, designated to the Illinois Environmental Protection Trust Fund and submitted to:

Illinois Environmental Protection Agency  
Fiscal Services Section  
1021 North Grand Avenue East  
P.O. Box 19276  
Springfield, Illinois 62794-9276

The amount of Twelve Thousand Seven Hundred Twenty-Five Dollars (\$12,725.00) shall be paid by certified check, money order or electronic funds transfer payable to the Illinois EPA, designated to the Environmental Inspection and Permit Fund and submitted to:

Illinois Environmental Protection Agency  
Fiscal Services Section  
1021 North Grand Avenue East  
P.O. Box 19276  
Springfield, Illinois 62794-9276

The name and number of the case and Quantum's Federal Employer Identification Number ("FEIN"), 36-4015016, shall appear on the check(s). A copy of the certified check(s), money order(s) or record(s) of electronic funds transfer and any transmittal letter(s) shall be sent to:

Katherine M. Hausrath  
Assistant Attorney General  
Environmental Bureau  
188 W. Randolph St., 20<sup>th</sup> Floor  
Chicago, Illinois 60601

Maureen Wozniak  
Assistant Counsel  
Illinois Environmental Protection Agency  
1021 North Grand Avenue East  
P.O. Box 19276  
Springfield, Illinois 62794-9276

2. Pursuant to Section 42(g) of the Act, 415 ILCS 5/42(g) (2004), interest shall accrue on any payment not paid within the time period prescribed above at the maximum rate allowable under Section 1003(a) of the Illinois Income Tax Act, 35 ILCS 5/1003 (2004). Interest on any unpaid payment shall begin to accrue from the date the payment is due and continue to accrue until the date payment is received. When partial payment(s) are made, such partial payment shall be first applied to any interest on unpaid payment then due and owing. All interest on payment owed shall be paid by certified check, money order or electronic funds transfer, payable to the Illinois EPA, designated to the Illinois Environmental Protection Trust Fund and delivered to the address and in the manner described above.

3. For purposes of payment and collection, Quantum may be reached at the following address:

Raymond Barrett  
Quantum Color Graphics, L.L.C.



6511 West Oakton Street  
Morton Grove, Illinois 60053

with a copy to:

Robert M. Baratta, Jr.  
Freeborn & Peters LLP  
311 South Wacker Drive  
Suite 3000  
Chicago, Illinois 60606

4. In the event of default of this Section VIII.A, the Complainant shall be entitled to all available relief including, but not limited to, reasonable costs of collection and reasonable attorney's fees.

**B. Future Compliance**

1. Upon the issuance of the CAAPP permit for the Facility by the Illinois EPA, Quantum shall at all times operate its Facility in compliance with all of the terms and conditions of said CAAPP Permit, including any and all special and standard conditions contained therein.

2. Defendant shall at all times in the future timely submit to the Illinois EPA its CAAPP permit renewal application.

**C. Future Use**

Notwithstanding any other language in this Stipulation to the contrary, and in consideration of the mutual promises and conditions contained in this Stipulation, including the Release from Liability contained in Section VIII.E, below, Quantum hereby agrees that this Stipulation may be used against Quantum in any subsequent enforcement action or permit proceeding as proof of a past adjudication of violation of the Act and the Board Regulations

promulgated thereunder for all violations alleged in the Complaint in this matter, for purposes of Section 39(a) and (i) and/or 42(h) of the Act, 415 ILCS 5/39(a) and(i) and/or 5/42(h)(2004).

Further, Quantum agrees to waive any rights to contest, in any subsequent enforcement action or permit proceeding, any allegations that these alleged violations were adjudicated.

**D. Cease and Desist**

Quantum shall cease and desist from future violations of the Act and Board Regulations that were the subject matter of the Complaint as outlined in Section III.C ("Allegations of Non-Compliance") of this Stipulation.

**E. Release from Liability**

In consideration of Quantum's payment of the \$44,000.00 penalty and any specified costs and accrued interest, completion of all activities required hereunder, to Cease and Desist as contained in Section VIII.D and upon the Pollution Control Board's acceptance and approval of the terms of this Stipulation, the Complainant releases, waives and discharges Quantum from any further liability or penalties for violations of the Act and Board Regulations that were the subject matter of the Complaint herein. The release set forth above does not extend to any matters other than those expressly specified in Complainant's Complaint filed on September 6, 2005. The Complainant reserves, and this Stipulation is without prejudice to, all rights of the State of Illinois against Quantum with respect to all other matters, including but not limited to, the following:

- a. criminal liability;
- b. liability for future violation of state, federal, local, and common laws and/or regulations;
- c. liability for natural resources damage arising out of the alleged violations; and
- d. liability or claims based on Quantum's failure to satisfy the requirements of this Stipulation.

Nothing in this Stipulation is intended as a waiver, discharge, release, or covenant not to sue for any claim or cause of action, administrative or judicial, civil or criminal, past or future, in law or in equity, which the State of Illinois or the Illinois EPA may have against any person, as defined by Section 3.315 of the Act, 415 ILCS 5/3.315, or entity other than Quantum.

**F. Right of Entry**

In addition to any other authority, the Illinois EPA, its employees and representatives, and the Attorney General, her agents and representatives, shall have the right of entry into and upon Quantum's Facility which is the subject of this Stipulation, at all reasonable times for the purposes of carrying out inspections. In conducting such inspections, the Illinois EPA, its employees and representatives, and the Attorney General, her employees and representatives may take photographs, samples, and collect information, as they deem necessary.

**G. Correspondence, Reports and Other Documents**

Any and all correspondence, reports and any other documents required under this

Stipulation, except for payments pursuant to Sections VIII.A ("Penalty Payment") of this

Stipulation shall be submitted as follows:

As to the Complainant

Katherine M. Hausrath  
Assistant Attorney General  
Environmental Bureau  
188 W. Randolph St., 20<sup>th</sup> Floor  
Chicago, Illinois 60601

Maureen Wozniak  
Assistant Counsel  
Illinois EPA  
1021 North Grand Avenue East  
P.O. Box 19276  
Springfield, Illinois 62794-9276

Manager  
Compliance and Enforcement Section  
Illinois EPA  
1021 North Grand Avenue East  
P.O. Box 19276  
Springfield, Illinois 62794-9276

As to Quantum

Raymond Barrett  
Quantum Color Graphics, L.L.C.  
6511 West Oakton Street  
Morton Grove, Illinois 60053

with a copy to:

Robert M. Baratta, Jr.  
Freeborn & Peters LLP  
311 South Wacker Drive  
Suite 3000

Chicago, Illinois 60606

**H. Modification of Stipulation**

The parties may, by mutual written consent, agree to extend any compliance dates or modify the terms of this Stipulation. A request for any modification shall be made in writing and submitted to the contact persons identified in Section VIII.G. Any such request shall be made by separate document, and shall not be submitted within any other report or submittal required by this Stipulation. Any such agreed modification shall be in writing, signed by authorized representatives of each party, and then accompany a joint motion to the Illinois Pollution Control Board seeking a modification of the prior order approving and accepting the Stipulation to approve and accept the Stipulation as amended.

**I. Enforcement of Board Order**

1. Upon the entry of the Board's Order approving and accepting this Stipulation, that Order is a binding and enforceable order of the Illinois Pollution Control Board and may be enforced as such through any and all available means.

2. Quantum agrees that notice of any subsequent proceeding to enforce the Board Order approving and accepting this Stipulation may be made by mail and waives any requirement of service of process.

3. The parties agree that, if the Board does not approve and accept this Stipulation, then neither party is bound by the terms herein.

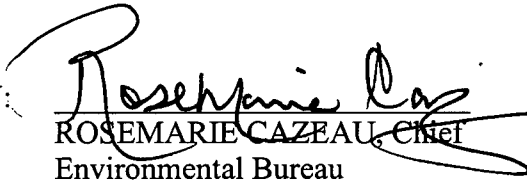
4. It is the intent of the Complainant and Quantum that the provisions of this Stipulation and any Board Order accepting and approving such shall be severable, and should any provision be declared by a court of competent jurisdiction to be inconsistent with state or federal law, and therefore unenforceable, the remaining clauses shall remain in full force and effect.

WHEREFORE, Complainant and Quantum request that the Board adopt and accept the foregoing Stipulation and Proposal for Settlement as written.

PEOPLE OF THE STATE OF ILLINOIS,


LISA MADIGAN  
Attorney General  
State of Illinois

MATTHEW J. DUNN, Chief  
Environmental Enforcement/  
Asbestos Litigation Division

BY:   
ROSEMARIE CAZEAU, Chief  
Environmental Bureau  
Assistant Attorney General


DATE: 7/7/06

ILLINOIS ENVIRONMENTAL PROTECTION  
AGENCY

BY:   
ROBERT A. MESSINA  
Chief Legal Counsel

DATE: 7/5/06

QUANTUM COLOR GRAPHICS, L.L.C., an Illinois  
limited liability company.

BY: 

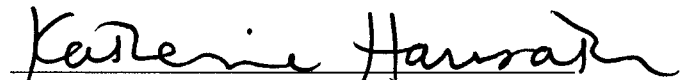
DATE: 8/15/06

Name: Raymond J. Bannan

Title: CEO

**CERTIFICATE OF SERVICE**

I, KATHERINE M. HAUSRATH, an Assistant Attorney General, do certify that I caused to be mailed this 11 day of September, 2006, the foregoing Motion to Request Relief from Hearing, Stipulation and Proposal for Settlement with Respondent Quantum Color Graphics, LLC, and Notice of Filing, upon the persons listed on said notice, by certified mail.



KATHERINE M. HAUSRATH  
Assistant Attorney General  
Environmental Bureau  
188 West Randolph, 20<sup>th</sup> Floor  
Chicago, IL 60601  
312-814-0660