ILLINOIS POLLUTION CONTROL BOARD

ORIGINAL JUN 0 4 2007 ILLINOIS ENVIRONMENTAL STATE OF ILLINOIS **Pollution Control Board** PROTECTION AGENCY, Complainant, AC 07-53 (IEPA No. 58-07-AC) ٧. (Administrative Citation) RENEE C. LO Respondent.

### PETITION FOR WITHDRAWAL OF ORDER ENTERED ON MAY 17, 2007

Renee C. Lo, by her attorneys, Miller & Hendren, LLP, for her Motion in the above cause, states that:

- Her Response to Citation with Entry of Appearance was forwarded on May 10, 2007 as confirmed by the appended true copy.
- Said order entered on May 12, 2007 apparently did not consider the timely 2. response provided.

WHEREFORE, Respondent respectfully requests that the order be vacated and that consideration be given to the Response provided and submitted a second time for the within purpose. Rener C. Lo

> Respectfully submitted by Renee C. Lo By Miller & Hendren, LLP, her attorneys

> > Harold a mille

RECEIVED

of Counsel

# CERTIFICATE OF SERVICE RIGINAL RECEIVED

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Illinois Pollution Control Board James R. Thompson Center 100 W. Randolph St., Suite 11-500 Chicago, IL 60601

JUN 0 4 2007

STATE OF ILLINOIS Pollution Control Board

The undersigned, for and on behalf of Renee C. Lo, Respondent, hereby certifies that on this date, the above address was duly provided a copy of her Petition for Withdrawal of Order Entered May 17, 2007, by forwarding copies thereof to each by depositing the same in the U.S. Mail Service in Champaign, Illinois, properly addressed, and with appropriate postage affixed.

May 30, 2007

Prepared by: Miller & Hendren, LLP P.O. Box 980 Champaign, IL 61824-0980 Tel (217) 352-2171 Fax (217) 352-3839



# BEFORE THE ILLINOIS POLLUTION CONTROL BOARD JUN 0 4 2007

		STATE OF ILLINOIS Pollytion Control/Beard
ILLINOIS ENVIRONMENTAL PROTECTION AGENCY,	GRIGINAL	MAY 10:07 AC SUBMISSION
Complainant,	) ) IEPA No. 58-07	ac Submission
v	) and ) 0198025005 Cha	mpaign County
RENEE C. LO	)	
Respondent	)	

### RESPONSE TO CITATION AND ENTRY OF APPEARANCE

Renee C. Lo, by her attorney, Miller & Hendren, LLP, for her Response to the Citation herein made, states the 🛨

- 1. She has cleared the subject property, and will continue to clean up debris deposited on her land by trespassers.
- 2. Prior to the entry of this citation Respondent had cleared the subject premises several occasions from unauthorized dumping of garbage, old furniture and trash on this property.
- 3. The condition reviewed by the environmental inspection was caused by unknown parties on several occasions with an effort each time by the Respondent to clear the property.
- 4. Assurance is hereby given that Respondent will timely act each time to correct known violations of environmental regulations by those trespassers.

WHEREFORE, Respondent respectfully requests that the Citations be vacated on the grounds that she will expend every effort to clear dumping by trespassers.

Respectfully submitted,

Renee C. Lo

By: Miller & Hendren, LLP, Her Attorneys

Prepared by: Miller & Hendren, LLP PO Box 980 Champaign, IL 61824-0980 Tel (217) 352-2171 Fax (217) 352-3839

## BEFORE THE ILLINOIS POLLUTION CONTROL REPORT VED CLERK'S OFFICE

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PROTECTION AGENCY,	RIGINAL	STATE OF ILLINOIS Pollution Control Board	
Complainant,	)		
V.	· · · · · · · · · · · · · · · · · · ·	LPC #0198205005 Champaign, Illinois (IEPA No. 58-07-AC)	
	)	,	
RENEE C. LO	)		
Respondent.	)		

#### **CERTIFICATE OF SERVICE OF:**

- A. Notice of Filing of Response to Citation;
- Notice of Entry of Appearance thereto. B.

To: Clerk of Illinois Pollution Control Bard State of Illinois Center 100 West Randolph, Suite 115 Chicago, IL 60601

and to

Illinois Environmental Agency's Division Legal Counsel 1021 North Grand East P.O. Box 19276 Springfield, IL 62794-9276

The undersigned, for and on behalf of Renee C. Lo, Respondent, hereby certifies that on this date, the above addresses were duly provided a copy of her Response to the above entitled Citation, by forwarding copies thereof to each by depositing the same in the U.S. Mail Service in Champaign, Illinois, properly addressed, and with appropriate postage affixed.

Thouga Mille

May 10, 2007

Prepared by: Miller & Hendren, LLP P.O. Box 980 Champaign, IL 61824-0980

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