LAW OFFICES

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RECEIVED CLERK'S OFFICE

JUN 0 4 2007

STATE OF ILLINOIS
Pollution Control Board

Aco 1.54

May 29, 2007

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

Re:

HAROLD A. MILLER

PAUL C. HENDREN MARC R. MILLER

JO C. WILLIAMSON

(1933-1979)

Adolf M. Lo

IEPA File No. 113-07-AC 0198025007 Champaign County Via Certified Mail/Return Receipt

Ladies and Gentlemen:

Enclosed are the following relating to the above:

- A. True copy of the IEPA agency Notice dated May 22, 2007 relating to the above, forwarded to your office via Electronic Filing.
- B. For verification of compliance by the Respondent, we appended a true copy of his "Response to Citation," which we believe had been filed earlier, with a copy of our current Certification of Service.

Should there be a question or concern whatsoever pertaining thereto, please advise for our prompt response.

Cordially,

Miller & Hendren, LLP

Javel Brille

HAM/lso Enclosure

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

ILLINOIS ENVIRONMENTAL)	0.5
PROTECTION AGENCY,)	ORIGINAL
Complainant,)	AC 07-54
v.)	(IEPA No. 113-07-ACRECEIVED CLERK'S OFFICE
ADOLPH M. LO,)	JUN 0 4 2007
Respondent.)	STATE OF ILLINOIS Pollution Control Board

NOTICE OF FILING

To: Harold W. Miller

Miller & Hendren, LLP

P.O. Bpx 980

Champaign, IL 61824-0980

PLEASE TAKE NOTICE that on this date I electronically filed with the Clerk of the Pollution Control Board of the State of Illinois the following instrument(s) entitled CERTIFIED MAIL RECEIPT.

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: May 22, 2007

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

ADMINISTRATIVE CITATION

BEFORE THE ILLI	NOIS POL	LUTION CONTROL BOARD
ADMI	NISTRAT	IVE CITATION Jul Copy
ILLINOIS ENVIRONMENTAL)	
PROTECTION AGENCY,)	
)	
Complainant,)	
)	LPC #019820500 7
v.)	(IEPA No. 113-07-AC) Champaign County, IL
)	
ADOLPH M. LO)	
)	
Respondent.)	

RESPONSE TO CITATION AND ENTRY OF APPEARANCE

Adolf M. Lo, by his attorneys, Miller & Hendren, LLP, for his Response to the Citation herein made, states that:

- He has cleared the subject property, and will continue to clean up debris deposited on his land by others.
- Prior to the entry of this Citation, Respondent had cleared the subject premise on at least two occasions from unauthorized dumping on his property.
- The residence property was then broken into, with windows smashed, plumbing and fixtures removed, leaving the house in deplorable condition, and with rejects and garbage items strewn on the land.
- 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.
- 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 Citation be vacated on the grounds that he will expend every effort to clear dumping by trespassers.

Respectfully submitted,

Prepared by:

Miller & Hendren, LLP

P.O. Box 980

Champaign, IL 61824-0980

Tel (217) 352-2171

Fax (217) 352-3839

er & Hendren, LLP, His Attorneys

ORIGINAL

RECEIVED CLERK'S OFFICE

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

JUN 0 4 2007 _STATE OF ILLINOIS

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)	LPC #0198205007	
)	(IEPA No. 113-07-AC)	
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CERTIFICATE OF SERVICE OF:

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

Clerk of Illinois Pollution Control Bard To: 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 Adolf M. Lo, Respondent, hereby certifies that on this date, the above addresses were duly provided a copy of his 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.

Harred amily

May 10, 2007

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