

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

AUG 06 2007

STATE OF ILLINOIS
Pollution Control Board

PEOPLE OF THE STATE OF ILLINOIS,)
)
Complainant,)
)
v.)
)
C. GRANTHAM COMPANY, an Illinois)
Corporation,)
)
Respondent.)

PCB No. 07-132

RESPONDENT'S ANSWER TO THE COMPLAINT

NOW COMES Respondent, C. GRANTHAM COMPANY, through its undersigned attorney, and pursuant to this Board's procedural rule 103.204(d), 35 Ill. Adm. Code Section 103.204(d), hereby submits its Answer to the Complaint filed in this case.

Count I

Respondent, C. GRANTHAM COMPANY, hereby **DENIES** the following allegations of Count I of the Complaint: Paragraphs 3, 5, 6, 7, 13, 14, 16 and 17.

As to all paragraphs of Count I purporting to quote any statute or regulation, Respondent **DENIES** that said paragraphs fully or accurately quote the statute or regulation, and answering further, states that said statutes and regulations speak for themselves.

WHEREFORE Respondent, C. GRANTHAM COMPANY, requests that this Board enter an order in favor of Respondent as to Count I of the Complaint, and award to Respondent all such other and further relief as is meet, just and available.

Count II

Respondent, C. GRANTHAM COMPANY, hereby **DENIES** the following allegations of Count II of the Complaint: Paragraphs 3, 9, 10, 11, 12, 13, 14, 15, 16, 17 and 18.

As to all paragraphs of Count II purporting to quote any statute or regulation, Respondent **DENIES** that said paragraphs fully or accurately quote the statute or regulation, and answering further, states that said statutes and regulations speak for themselves.

WHEREFORE Respondent, C. GRANTHAM COMPANY, requests that this Board enter an order in favor of Respondent as to Count II of the Complaint, and grant to Respondent all such other and further relief as is meet, just and available.

Count III

Respondent, C. GRANTHAM COMPANY, hereby **DENIES** the following allegations of Count III of the Complaint: Paragraphs 3, 9, 10, 11, 12, 16, 17, 18 and 19.

As to all paragraphs of Count III purporting to quote any statute or regulation, Respondent **DENIES** that said paragraphs fully or accurately quote the statute or regulation, and answering further, states that said statutes and regulations speak for themselves.

WHEREFORE Respondent, C. GRANTHAM COMPANY, requests that this Board enter an order in favor of Respondent as to Count III of the Complaint, and award to Respondent all such other and further relief as is meet, just and available.

Count IV

Respondent, C. GRANTHAM COMPANY, hereby **DENIES** the following allegations of Count IV of the Complaint: Paragraphs 3, 5, 6, 7 and 9.

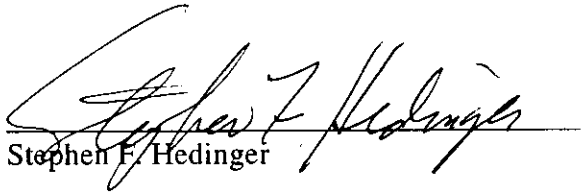
As to all paragraphs of Count IV purporting to quote any statute or regulation, Respondent **DENIES** that said paragraphs fully or accurately quote the statute or regulation, and answering further, states that said statutes and regulations speak for themselves.

WHEREFORE Respondent, C. GRANTHAM COMPANY, requests that this Board enter an order in favor of Respondent as to Count IV of the Complaint, and award to Respondent all such other and further relief as is meet, just and available.

Respectfully submitted,

C. Grantham Company, Respondent

By and through its attorney,


Stephen F. Hedinger

Hedinger Law Office
2601 South Fifth Street
Springfield, IL 62703
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NOTICE OF FILING AND PROOF OF SERVICE

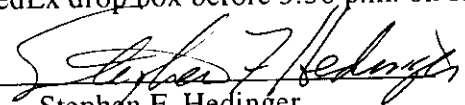
The undersigned certifies that an original and nine copies of C. GRANTHAM COMPANY'S ANSWER TO THE COMPLAINT were served upon the Clerk of the Illinois Pollution Control Board, and one copy was served upon each of the following parties of record and the Hearing Officer in this cause by enclosing same in envelopes addressed to:

Dorothy Gunn, Clerk (FedEx)
Illinois Pollution Control Board
James R. Thompson Center
100 W. Randolph St., Suite 11-500
Chicago, IL 60601

Carol Webb, Hearing Officer
Illinois Pollution Control Board
1021 North Grand Avenue East
Springfield, IL 62794

Michael D. Mankowski
Office of the Attorney General
Environmental Bureau
500 South Second Street
Springfield, IL 62706

with postage fully prepaid, and by depositing said envelopes in a U.S. Post Office Mail Box in Springfield, Illinois on the 3rd day of August, 2007, before 5:30 p.m., except the original and nine copies served upon the Clerk were placed in a FedEx drop box before 5:30 p.m. on said date.


Stephen F. Hedinger

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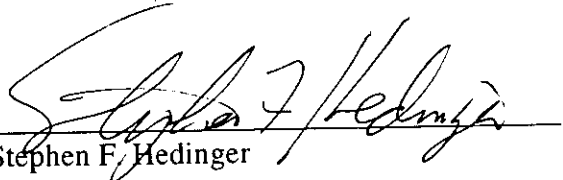
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ENTRY OF APPEARANCE

The undersigned, STEPHEN F. HEDINGER, of the Hedinger Law Office, hereby enters his appearance as Counsel of Record on behalf of Respondent, C. GRANTHAM COMPANY, an Illinois Corporation, in this matter.

Respectfully submitted,


Stephen F. Hedinger

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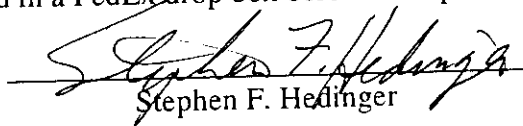
The undersigned certifies that an original and nine copies of C. GRANTHAM COMPANY'S ENTRY OF APPEARANCE were served upon the Clerk of the Illinois Pollution Control Board, and one copy was served upon each of the following parties of record and the Hearing Officer in this cause by enclosing same in envelopes addressed to:

Dorothy Gunn, Clerk (FedEx)
Illinois Pollution Control Board
James R. Thompson Center
100 W. Randolph St., Suite 11-500
Chicago, IL 60601

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