

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

ILLINOIS ENVIRONMENTAL )  
PROTECTION AGENCY, )  
 )  
Complainant, ) AC 07-24  
 )  
v. ) (IEPA No. 304-06-AC)  
 )  
C. JOHN BLICKHAN, )  
 )  
Respondent. )

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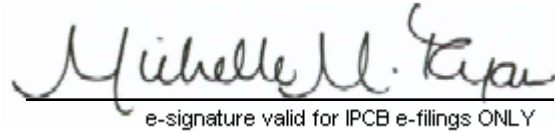
ILLINOIS ENVIRONMENTAL )  
PROTECTION AGENCY, )  
 )  
Complainant, ) AC 08-19  
 )  
v. ) (IEPA No. 23-08-AC)  
 )  
C. JOHN BLICKHAN, )  
 )  
Respondent. )

**NOTICE OF FILING**

To: Jon S. Faletto  
Hinshaw & Culbertson, LLP  
416 North Main Street  
Suite 600  
Peoria, Illinois 61602

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 MOTION TO CONSOLIDATE FOR PURPOSES OF HEARING.

Respectfully Submitted,



*Michelle M. Ryan*

e-signature valid for IPCB e-filings ONLY

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: June 10, 2008

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MOTION TO CONSOLIDATE  
FOR PURPOSES OF HEARING

NOW COMES the Complainant, the Illinois Environmental Protection Agency (“Illinois EPA”), by and through its attorney, Special Assistant Attorney General Michelle M. Ryan, pursuant to 35 Ill. Adm. Code 101.406 and 101.500, and respectfully states as follows:

(1) Pursuant to 35 Ill. Adm. Code 101.500(b) and 101.502, this motion is directed to the hearing officer.

(2) On October 30, 2006, Illinois EPA filed Administrative Citation AC 07-24 against Respondent, C. John Blickhan (“Respondent”) based on an inspection conducted at a property

designated with Site Code No. 0010650002. On November 9, 2006, Respondent filed a Petition for Review.

(3) On February 29, 2008, Illinois EPA filed Administrative Citation AC 08-19 against the Respondent, based on an inspection conducted at the same property. On March 24, 2008, Respondent filed a Petition for Review through Jon S. Faletto, Hinshaw and Culbertson LLP.

(4) On April 14, 2008, Jon Faletto moved for substitution of counsel in AC 07-24.

(5) The parties and attorneys in these two cases are identical, Illinois EPA's main witnesses are likewise identical, and the burdens of proof are identical.

(6) Consolidation for the purpose of hearing is in the interest of convenient, expeditious, and complete determination of claims in each of these cases.

(7) No material prejudice would be caused by consolidating these cases for hearing.

WHEREFORE, the Illinois Environmental Protection Agency requests that the Board consolidate the pending actions against Respondent for purposes of hearing.

ILLINOIS ENVIRONMENTAL  
PROTECTION AGENCY,  
Complainant



Michelle M. Ryan  
e-signature valid for IPCB e-filings ONLY

Michelle M. Ryan  
Special Assistant Attorney General

Illinois Environmental Protection Agency  
1021 North Grand Avenue East  
P.O. Box 19276  
Springfield, Illinois 62794-9276  
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**PROOF OF SERVICE**


I hereby certify that I did on the 10<sup>th</sup> day of June, 2008, send by U.S. Mail with postage thereon fully prepaid, by depositing in a United States Post Office Box a true and correct copy of the following instrument(s) entitled MOTION TO CONSOLIDATE FOR PURPOSES OF HEARING.

To: Jon S. Faletto  
Hinshaw & Culbertson, LLP  
416 North Main Street  
Suite 600  
Peoria, Illinois 61602

Carol Webb, Hearing Officer  
Pollution Control Board  
P.O. Box 19274  
1021 North Grand Avenue East  
Springfield, Illinois 62794-9274

and an electronic copy of the same foregoing instrument on the same date via electronic filing

To: John Therriault, Acting Clerk  
Pollution Control Board  
James R. Thompson Center  
100 West Randolph Street, Suite 11-500  
Chicago, Illinois 60601



e-signature valid for IPCB e-filings ONLY

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