

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 North Grand Avenue East, P.O. Box 19276, Springfield, Illinois 62794-9276 • (217) 782-2829 James R. Thompson Center, 100 West Randolph, Suite 11-300, Chicago, IL 60601 • (312) 814-6026

PAT QUINN, GOVERNOR

Douglas P. Scott, Director

RECEIVED CLERK'S OFFICE

JUL 1 3 2009

STATE OF ILLINOIS Pollution Control Board

OR/G/NAL

(217) 782-9817

TDD: (217) 782-9143

July 8, 2009

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

Re:

Illinois Environmental Protection Agency v. Jess Spradlin dba Spradlin Mobile Home Sales,

Acro-

and Drewnard Woods and Kris Warren dba W&W Auto Service IEPA File No.136-09-AC; 1671205263—Sangamon County

Dear Mr. Therriault:

Enclosed for filing with the Illinois Pollution Control Board, please find the original and nine true and correct copies of the Administrative Citation Package, consisting of the Administrative Citation, the inspector's Affidavit, and the inspector's Illinois Environmental Protection Agency Open Dump Inspection Checklist, issued to the above-referenced respondent(s).

On this date, a copy of the Administrative Citation Package was sent to the Respondent(s) via Certified Mail. As soon as I receive the return receipt, I will promptly file a copy with you, so that the Illinois Pollution Control Board may calculate the thirty-five (35) day appeal period for purposes of entering a default judgment in the event the Respondent(s) fails or elects not to file a petition for review contesting the Administrative Citation.

If you have any questions or concerns, please do not hesitate to contact me at the number above. Thank you for your cooperation.

Sincerely,

Michelle M. Ryan Assistant Counsel

Enclosures

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD ADMINISTRATIVE CITATION

| ILLINOIS ENVIRONMENTAL PROTECTION AGENCY, |)))))) Control Board |
|---|----------------------------|
| Complainant, |) AC 10-1 |
| v. |) (IEPA No. 139-09-AC) |
| JESS SPRADLIN, dba SPRADLIN MOBILE HOME SALES, and DREWNARD WOODS and KRIS WARREN dba W&W AUTO SERVICE, | ORIGINAL |
| Respondents. |) |

NOTICE OF FILING

To: Jess Spradlin

> dba Spradlin Mobile Home Sales 1034 East Morton Avenue

> Jacksonville, Illinois 62650-3302

Drewnard Woods and Kris Warren

dba W&W Auto Service 1709 South Dirksen Parkway Springfield, Illinois 62702

PLEASE TAKE NOTICE that on this date I mailed for filing with the Clerk of the Pollution

Control Board of the State of Illinois the following instrument(s) entitled ADMINISTRATIVE CITATION, AFFIDAVIT, and OPEN DUMP INSPECTION CHECKLIST.

Respectfully submitted,

Michelle M. Ryan Assistant Counsel

Illinois Environmental Protection Agency 1021 North Grand Avenue East P.O. Box 19276 Springfield, Illinois 62794-9276 (217) 782-5544

Dated: July 8, 2009

| BEFORE THE ILLINOIS POL ADMINISTRAT | IVE CITATION JUL 13 2002 |
|---|---|
| ILLINOIS ENVIRONMENTAL PROTECTION AGENCY, | STATE OF ILLINOIS Pollution Control Board |
| Complainant, | AC 10 - |
| V | (IEPA No.139-09-AC) |
| JESS SPRADLIN, dba SPRADLIN MOBILE HOME SALES, and DREWNARD WOODS and KRIS WARREN dba W&W AUTO SERVICE, | ORIGINAL |
| Respondents. |) |

JURISDICTION

This Administrative Citation is issued pursuant to the authority vested in the Illinois Environmental Protection Agency by Section 31.1 of the Illinois Environmental Protection Act, 415 ILCS 5/31.1 (2006).

FACTS

- 1. That Jess Spradlin dba Spradlin Mobile Home Sales, and Drewnard Woods and Kris Warren dba W&W Auto Service are the current owners and operators ("Respondents") of a facility located at 1709 South Dirksen Parkway, Springfield, Sangamon County, Illinois. The property is commonly known to the Illinois Environmental Protection Agency as Springfield/W&W Auto Service Property.
- 2. That said facility is an open dump operating without an Illinois Environmental Protection Agency Operating Permit and is designated with Site Code No. 1671205263.
 - 3. That Respondents have owned and operated said facility at all times pertinent hereto.
- 4. That on May 20, 2009, Jan Mier of the Illinois Environmental Protection Agency's ("Illinois EPA") Springfield Regional Office inspected the above-described facility. A copy of her

inspection report setting forth the results of said inspection is attached hereto and made a part hereof.

5. That on July 8, 2009, Illinois EPA sent this Administrative Citation via

Certified Mail No. 7007 3020 0002 3214 3698 AND 7007 3020 0002 3214 3695.

VIOLATIONS

Based upon direct observations made by Jan Mier during the course of her May 20, 2009 inspection of the above-named facility, the Illinois Environmental Protection Agency has determined that Respondents have violated the Illinois Environmental Protection Act (hereinafter, the "Act") as follows:

(1) That Respondents caused or allowed the open dumping of waste in a manner resulting in litter, a violation of Section 21(p)(1) of the Act, 415 ILCS 5/21(p)(1) (2006).

CIVIL PENALTY

Pursuant to Section 42(b)(4-5) of the Act, 415 ILCS 5/42(b)(4-5) (2006), Respondents are subject to a civil penalty of One Thousand Five Hundred Dollars (\$1,500.00) for each of the violations identified above, for a total of <u>One Thousand, Five Hundred Dollars (\$1,500.00)</u>. If Respondents elect not to petition the Illinois Pollution Control Board, the statutory civil penalty specified above shall be due and payable no later than <u>August 1, 2009</u>, unless otherwise provided by order of the Illinois Pollution Control Board.

If Respondents elect to contest this Administrative Citation by petitioning the Illinois Pollution Control Board in accordance with Section 31.1 of the Act, 415 ILCS 5/31.1 (2006), and if the Illinois Pollution Control Board issues a finding of violation as alleged herein, after an adjudicatory hearing, Respondents shall be assessed the associated hearing costs incurred by the Illinois Environmental Protection Agency and the Illinois Pollution Control Board. Those hearing costs shall be assessed

in addition to the One Thousand Five Hundred Dollar (\$1,500.00) statutory civil penalty for each violation.

Pursuant to Section 31.1(d)(1) of the Act, 415 ILCS 5/31.1(d)(1) (2006), if Respondents fail to petition or elect not to petition the Illinois Pollution Control Board for review of this Administrative Citation within thirty-five (35) days of the date of service, the Illinois Pollution Control Board shall adopt a final order, which shall include this Administrative Citation and findings of violation as alleged herein, and shall impose the statutory civil penalty specified above.

When payment is made, Respondent's check shall be made payable to the Illinois Environmental Protection Trust Fund and mailed to the attention of Fiscal Services, Illinois Environmental Protection Agency, 1021 North Grand Avenue East, P.O. Box 19276, Springfield, Illinois 62794-9276. Along with payment, Respondents shall complete and return the enclosed Remittance Form to ensure proper documentation of payment.

If any civil penalty and/or hearing costs are not paid within the time prescribed by order of the Illinois Pollution Control Board, interest on said penalty and/or hearing costs shall be assessed against the Respondents from the date payment is due up to and including the date that payment is received. The Office of the Illinois Attorney General may be requested to initiate proceedings against Respondents in Circuit Court to collect said penalty and/or hearing costs, plus any interest accrued.

PROCEDURE FOR CONTESTING THIS ADMINISTRATIVE CITATION

Respondents have the right to contest this Administrative Citation pursuant to and in accordance with Section 31.1 of the Act, 415 ILCS 5/31/1 (2006). If Respondents elect to contest this Administrative Citation, then Respondents shall file a signed Petition for Review, including a Notice of Filing, Certificate of Service, and Notice of Appearance, with the Clerk of the Illinois Pollution Control Board, State of Illinois Center, 100 West Randolph, Suite 11-500, Chicago, Illinois 60601. A copy of said Petition for Review shall be filed with the Illinois Environmental Protection Agency's Division of Legal Counsel at 1021 North Grand Avenue East, P.O. Box 19276, Springfield, Illinois 62794-9276. Section 31.1 of the Act provides that any Petition for Review shall be filed within thirty-five (35) days of the date of service of this Administrative Citation or the Illinois Pollution Control Board shall enter a default judgment against the Respondents.

Douglas P. Scott, Director

Illinois Environmental Protection Agency

Past Director Date: 7/7/09

Prepared by:

Susan E. Konzelmann, Legal Assistant

Division of Legal Counsel

Illinois Environmental Protection Agency

1021 North Grand Avenue East

P.O. Box 19276

Springfield, Illinois 62794-9276

(217) 782-5544

| | REMITTANCE FORM | STATE = |
|--|---------------------|--|
| ILLINOIS ENVIRONMENTAL PROTECTION AGENCY, |) | STATE OF ILLINOIS Pollution Control Board |
| Complainant, |) AC 10- | |
| V. |) (IEPA No. 139 | |
| JESS SPRADLIN, dba SPRADLIN MOBILE HOME SA and DREWNARD WOODS and KRIS V dba W&W AUTO SERVICE, | ý | |
| Respondents. |) | ORENIA |
| FACILITY: Springfield/W&W Aut | to Service Property | |

SITE CODE NO .: 1671205263

COUNTY: Sangamon

CIVIL PENALTY: \$1,500.00

DATE OF INSPECTION: May 20, 2009

DATE REMITTED:

SS/FEIN NUMBER:

SIGNATURE:

NOTE

Please enter the date of your remittance, your Social Security number (SS) if an individual or Federal Employer Identification Number (FEIN) if a corporation, and sign this Remittance Form. Be sure your check is enclosed and mail, along with Remittance Form, to Illinois Environmental Protection Agency, Attn.: Fiscal Services, P.O. Box 19276, Springfield, Illinois 62794-9276.

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY LERK'S OFFICE AFFIDAVIT STATE OF ILLINOIS STATE OF ILLINOIS STATE OF ILLINOIS Pollution Control Board Vs. IEPA DOCKET NO. Jess Spradlin, dba Spradlin Mobile Homes Sales, and Drewnard Woods and Kris Warren, dba W&W Auto Service, Respondents

Affiant, Jan Mier, being first duly sworn, voluntarily deposes and states as follows:

- 1. Affiant is a field inspector employed by the Division of Land Pollution Control/Field Operations Section of the Environmental Protection Agency and has been so employed at all times pertinent hereto.
- 2. On May 20, 2009, between 11:45 a.m. and 12:05 p.m., Affiant conducted an inspection of an open dump, located in Sangamon County, Illinois and known as *Springfield/W&W Auto Service* by the Illinois Environmental Protection Agency. Said site has been assigned site code number LPC #1671205263 by the Agency.
- 3. Affiant inspected said site by an on-site inspection, which included walking and photographing the site.
- 4. As a result of the activities referred to in Paragraph 3 above, Affiant completed the Inspection Report form attached hereto and made a part hereof, which, to the best of Affiant's knowledge and belief, is an accurate representation of Affiant's observations and factual conclusions with respect to said open dump.

Jan Mier

Subscribed and Sworn to Before Me this 17 day of June, 2009

Marlene Y. Lowell
Notary Public

OFFICIAL SEAL
CHARLENE K. POWELL
NOTARY PUBLIC - STATE OF ILLINOIS
MY COMMISSION EXPIRES MARCH 15, 2012

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY'S OFFICE **Open Dump Inspection Checklist**

JUL 1 3 2009

| County: | Sangamon | | L | _PC#: 16 | 37120 | 5263 | Regio STATA | F-QTH-HANS In Control Board |
|--|------------|---------|---------|-----------|-------|-----------|---------------------------|--------------------------------|
| Location/S | Site Name: | Springf | ield/W8 | W Auto Se | rvice | | Tolicae | |
| Date: | 5/20/09 | Time: | From | 11:45 AM | То | 12:05 PM. | Previous Inspection Date: | 1/23/09 |
| Inspector(s): Jan Mier Weather: 75° Sunny | | | | | | | | |
| No. of Photos Taken: # 15 Est. Amt. of Waste: 55 yds³ Samples Taken: Yes # | | | | | No x | | | |
| Interviewed: Kris Warren | | | | _ | Compl | aint #: | | |
| | | | | | | | | |

Responsible Party Mailing Address(es) and Phone Number(s):

Drewnard Woods and Kris Warren dba W&W Auto Service 1709 S. Dirksen Parkway Springfield, IL 62702 217/525-2376

Jess Spradlin Spradlin Mobile Homes Sales 1034 E. Morton Ave. Jacksonville, IL 62650-3302 217/243-4449/

| | SECTION | DESCRIPTION | VIOL |
|----|---------|--|-------------|
| | ILL | INOIS ENVIRONMENTAL PROTECTION ACT REQUIREMENTS | |
| 1. | 9(a) | CAUSE, THREATEN OR ALLOW AIR POLLUTION IN ILLINOIS | |
| 2. | 9(c) | CAUSE OR ALLOW OPEN BURNING | |
| 3. | 12(a) | CAUSE, THREATEN OR ALLOW WATER POLLUTION IN ILLINOIS | |
| 4. | 12(d) | CREATE A WATER POLLUTION HAZARD | |
| 5. | 21(a) | CAUSE OR ALLOW OPEN DUMPING | \boxtimes |
| 6. | 21(d) | CONDUCT ANY WASTE-STORAGE, WASTE-TREATMENT, OR WASTE- DISPOSAL OPERATION: | |
| | (1) | Without a Permit | |
| | (2) | In Violation of Any Regulations or Standards Adopted by the Board | |
| 7. | 21(e) | DISPOSE, TREAT, STORE, OR ABANDON ANY WASTE, OR TRANSPORT ANY WASTE INTO THE STATE AT/TO SITES NOT MEETING REQUIREMENTS OF ACT AND REGULATIONS | |
| 8. | 21(p) | CAUSE OR ALLOW THE OPEN DUMPING OF ANY WASTE IN A MANNER WHICH REIN ANY OF THE FOLLOWING OCCURRENCES AT THE DUMP SITE: | SULTS |
| | (1) | Litter | \boxtimes |
| | (2) | Scavenging | |
| | (3) | Open Burning | |
| | (4) | Deposition of Waste in Standing or Flowing Waters | |
| | (5) | Proliferation of Disease Vectors | |
| | (6) | Standing or Flowing Liquid Discharge from the Dump Site | |
| | | | |

LPC# 1671205263

Inspection Date: 5/20/09

| | (7) | Deposition of: (i) General Construction or Demolition Debris as defined in Section 3.160(a); or (ii) Clean Construction or Demolition Debris as defined in Section 3.160(b) | | | | |
|-----|---|---|-------------|--|--|--|
| 9. | 55(a) | NO PERSON SHALL: | | | | |
| | (1) | Cause or Allow Open Dumping of Any Used or Waste Tire | \boxtimes | | | |
| | (2) | Cause or Allow Open Burning of Any Used or Waste Tire | | | | |
| | (3) | Cause or Allow Water to Accumulate in Used Tires | \boxtimes | | | |
| | 35 ILLINOIS ADMINISTRATIVE CODE REQUIREMENTS SUBTITLE G | | | | | |
| 10. | 812.101(a) | FAILURE TO SUBMIT AN APPLICATION FOR A PERMIT TO DEVELOP AND OPERATE A LANDFILL | | | | |
| 11. | 722.111 | HAZARDOUS WASTE DETERMINATION | | | | |
| 12. | 808.121 | SPECIAL WASTE DETERMINATION | | | | |
| 13. | 809.302(a) | ACCEPTANCE OF SPECIAL WASTE FROM A WASTE TRANSPORTER WITHOUT A WASTE HAULING PERMIT, UNIFORM WASTE PROGRAM REGISTRATION AND PERMIT AND/OR MANIFEST | | | | |
| | OTHER REQUIREMENTS | | | | | |
| 14. | | APPARENT VIOLATION OF: () PCB; () CIRCUIT COURT CASE NUMBER: ORDER ENTERED ON: | | | | |
| 15. | OTHER: | | | | | |
| | | | | | | |
| | | | | | | |
| | | | | | | |
| | | | | | | |
| | | | | | | |

Informational Notes

- 1. [Illinois] Environmental Protection Act: 415 ILCS 5/4.
- 2. Illinois Pollution Control Board: 35 Ill. Adm. Code, Subtitle G.
- 3. Statutory and regulatory references herein are provided for convenience only and should not be construed as legal conclusions of the Agency or as limiting the Agency's statutory or regulatory powers. Requirements of some statutes and regulations cited are in summary format. Full text of requirements can be found in references listed in 1. and 2. above.
- 4. The provisions of subsection (p) of Section 21 of the [Illinois] Environmental Protection Act shall be enforceable either by administrative citation under Section 31.1 of the Act or by complaint under Section 31 of the Act.
- 5. This inspection was conducted in accordance with Sections 4(c) and 4(d) of the [Illinois] Environmental Protection Act: 415 ILCS 5/4(c) and (d).
- 6. Items marked with an "NE" were not evaluated at the time of this inspection.

STATE OF ILLINOIS ENVIRONMENTAL PROTECTION AGENCY INSPECTION NARRATIVE

LPC#1671205263 - Sangamon County - Springfield/W&W Auto Service FOS File

DATE: 5/20/09

INSPECTOR: Jan Mier

On May 20, 2009, I conducted a re-inspection at the above referenced site located at 1709 S. Dirksen Parkway in Springfield, IL. The property is owned by Jess Spradlin, who operates Spradlin Mobile Home Sales at the property. Drewnard Woods and Kris Warren, operate W&W Auto Service at the site. Both parties were sent an Administrative Citation Warning Notice dated February 18, 2009. A written response was not received from either party. Mr. Spradlin called me in April of 2009, requesting a few days extra to remove the remaining waste. I agreed. Their original deadline was March 23, 2009.

I arrived at 11:45 a.m. Kris Warren, who runs the business, was on site. I told him I was going in back to see if the violations had been taken care of. I first observed used tires off the rim (see photo #001) that contained water (see photo #002). On rim used tires were stacked in with vinyl siding, a barbeque grill, and lumber (see photo #003) against a shed. Also along the shed were pieces of metal, lumber and windows (see photo #004). On the west side of the property, I observed a desk and chair and a camper top and lumber lying on the ground (see photo #005). Some used tires on and off the rim were nearby. The off rim used tires held water (see photo #006). Pieces of insulation were lying on the ground (see photo #007). More on rim used tires were lying on the ground next to commercial lighting posts and a file cabinet, and two empty yellow drums (see photo #008). Along the fence on the east side of the property, I observed used on rim tires, an empty blue drum, plastic sheeting, and part of a sign (see photo #009). Also along the fence were more on rim used tires, a plastic bucket, and pieces of metal that were covered by vegetation (see photo #010). On the south side of the garage there were more auto body parts than during my previous inspection. The three drums (one of which contains paint waste), as well as an air conditioner, a pile of shingles, and plastic and metal containers (see photo #011). Photo #012 is a continuation of photo #011, showing more auto body parts, a weathered wooden structure, and a white plastic tank. Cinder blocks, a white plastic bucket, pvc pipe, an empty drum, and a green plastic container are shown in Photo #013. The row of mobile homes were still onsite (see photo #014). During my previous inspection, Mr. Warren said they were for sale for \$200.00 In the middle of the lot was a pickup truck bed cover, a stack of pallets, and oil pan, car mats, and paper (see photo #015).

I went back inside to garage to speak to Mr. Warren. I asked where the shed was that used tires were kept in during my last inspection. He said he had a tarp over the waste tires, but it had blown off in the storm that passed through. I told him to drain and cover the used tires immediately. The used oil tank had been labeled, resolving a violation of Section 739.122(c)(1) of the Illinois Pollution Control Board Regulations. I asked Mr. Warren if he had disposed of any used tires since I was last here. He called D's Auto World and had them fax me a copy of a receipt for 163 tires from Tire Shredders Unlimited on 4/17/09. This arrived on May 20, 2009 (see attached). I departed at 12:05 p.m. Continuing violations observed during the inspection are noted on the attached checklist.

cc: DLPC Division File DLPC/FOS – Springfield Region

STATE OF ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

SITE SKETCH

Date of Inspection:

5/20/09

Site Code:

Site:

LPC#1671205263

Springfield/W&W Auto Service

Inspector:

Jan Mier

County:

Sangamon

Time:

11:45 a.m. - 12:05 p.m.

Measurements Approximate Direction of Photo →

NORTH Not to Scale (15)5 Garage





Date: 5/20/09 Tlme: 11:47 a.m. Direction: W Photo by: Jan Mier Exposure #: 001 Comments:

Off rim used tires and empty drums



Date: 5/20/09 Time: 11:47 a.m. Direction: W Photo by: Jan Mier Exposure #: 002 Comments:

Off rim used tires with water inside them



Date: 5/20/09
Time: 11:47 a.m.
Direction: SW
Photo by: Jan Mier
Exposure #: 003
Comments:

On rim used tires, vinyl siding, barbeque grill, and lumber



Date: 5/20/09
Time: 11:48 a.m.
Direction: SW
Photo by: Jan Mier
Exposure #: 004
Comments:

Pieces of metal and lumber



Date: 5/20/09
Time: 11:49 a.m.
Direction: NW
Photo by: Jan Mier
Exposure #: 005
Comments:

Desk, chair, used tires, pickup camper top and lumber



Date: 5/20/09 Time: 11:50 a.m. Direction: NW Photo by: Jan Mier Exposure #: 006 Comments:

Used on and off rim tires with water in the off rim tire





Date: 5/20/09 Time: 11:51 a.m. Direction: N Photo by: Jan Mier Exposure #: 007 Comments:

Insulation



Date: 5/20/09 Time: 11:51 a.m. Direction: E Photo by: Jan Mier Exposure #: 008 Comments:

Commercial lighting, used on rim tires and empty yellow drums, and file cabinet



Date: 5/20/09 Time: 11:52 a.m. Direction: NE Photo by: Jan Mier Exposure #: 009 Comments:

Used on rim tires, empty blue drum, plastic sheeting, and part of a sign



Date: 5/20/09
Time: 11:53 a.m.
Direction: SE
Photo by: Jan Mier
Exposure #: 010
Comments:

Two used tires and white plastic containers with metal underneath vegetation



Date: 5/20/09 Time: 11:53 a.m. Direction: SE Photo by: Jan Mier Exposure #: 011 Comments:

Top blue drum with paint waste, blue and yellow empty drums, air conditioner, vehicle body parts, shingles, and plastic and metal containers



Date: 5/20/09 Time: 11:55 a.m. Direction: NE Photo by: Jan Mier Exposure #: 012 Comments:

Vehicle body parts, tanks, plastic containers, weathered wooded structure and white plastic tank in background overgrown with weeds



Date: 5/20/09
Time: 11:56 a.m.
Direction: SE
Photo by: Jan Mier
Exposure #: 013
Comments:

Concrete blocks, plastic container with unknown fluid, green plastic container, pvc pipe, plastic tank, and empty drum over grown with vegetation



Date: 5/20/09 Time: 11:57 a.m. Direction: N Photo by: Jan Mier Exposure #: 014 Comments:

Old mobile homes and vehicles

LPC #1671205263 - Sangamon County Springfield/W&W Auto Service FOS File

DIGITAL PHOTOGRAPHS



Date: 5/20/09 **Time:** 11:57 a.m. **Direction:** E

Photo by: Jan Mier Exposure #: 015 Comments:

Pickup bed cover, stack of pallets, oil pan, car mats, rubber, and paper





I hereby certify that I did on the 8th day of July 2009, send by Certified Mail, Renth Recount Requested, 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 ADMINISTRATIVE CITATION, AFFIDAVIT, and OPEN DUMP INSPECTION CHECKLIST

To: Jess Spradlin

> dba Spradlin Mobile Home Sales 1034 East Morton Avenue Jacksonville, Illinois 62650-3302

Drewnard Woods and Kris Warren dba W&W Auto Service

1709 South Dirksen Parkway Springfield, Illinois 62702

and the original and nine (9) true and contains date by Certified Mail, Return Receipt Requested, with postage thereon fully prepaid

To: John Therriault

> Pollution Control Board James R. Thompson Center

100 West Randolph Street, Suite 11-500

Chicago, Illinois 60601

Michelle M. Rvan

Assistant Counsel

Illinois Environmental Protection Agency 1021 North Grand Avenue East P.O. Box 19276 Springfield, Illinois 62794-9276 (217) 782-5544