

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

RECEIVED
CLERK'S OFFICE

SEP 29 2009

STATE OF ILLINOIS
Pollution Control Board

PEOPLE OF THE STATE OF ILLINOIS,

Complainant,

v.

WASTE HAULING LANDFILL, INC.,
JERRY CAMFIELD,
A.E. STALEY MANUFACTURING CO.,
ARCHER DANIELS MIDLAND, INC.,
ARAMARK UNIFORM SERVICES, INC.,
BELL SPORTS, INC.,
BORDEN CHEMICAL CO.,
BRIDGESTONE / FIRESTONE, INC.,
CLIMATE CONTROL, INC.,
CATERPILLAR, INC.,
COMBE LABORATORIES, INC.,
GENERAL ELECTRIC RAILCAR
SERVICES CORPORATION,
P & H MANUFACTURING, INC.,
TRINITY RAIL GROUP, INC.,
TRIPLE S REFINING CORPORATION, and
ZEXEL ILLINOIS, INC.

Respondents.

PCB 10-9

(Enforcement – Land, Cost Recovery)

NOTICE OF FILING

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

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

Matthew J. Dunn, Chief
James L. Morgan, Sr. Assistant
Attorney General
Environmental Bureau
Environmental Enforcement/Asbestos
Litigation Division
500 South Second Street
Springfield, IL 62706

SEE ATTACHED SERVICE LIST

PLEASE TAKE NOTICE that on this date I have issued for filing with the Office of the Clerk of the Pollution Control Board the following:

- MOTION FOR ADMISSION *PRO HAC VICE* of Mathew L. Larsen to appear on behalf of Hexion Specialty Chemicals, Inc., alleged successor-in-interest to named Respondent Borden Chemical Co.
- MOTION FOR ADMISSION *PRO HAC VICE* of William J. Denton to appear on behalf of Hexion Specialty Chemicals, Inc., alleged successor-in-interest to named Respondent Borden Chemical Co.
- APPEARANCE of Mathew L. Larsen on behalf of Hexion Specialty Chemicals, Inc., alleged successor-in-interest to named Respondent Borden Chemical Co.
- APPEARANCE of William J. Denton on behalf of Hexion Specialty Chemicals, Inc., alleged successor-in-interest to named Respondent Borden Chemical Co.
- AGREED MOTION FOR EXTENSION OF TIME

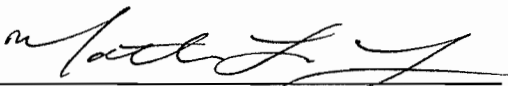
copies of which are herewith served upon you.

I verify this filing is submitted on recycled paper.

Dated: September 28, 2009

Respectfully submitted,

SHOOK, HARDY & BACON, L.L.P.

By: 

William J. Denton, *pro hac vice pending*
Mathew L. Larsen, *pro hac vice pending*
2555 Grand Blvd.

Kansas City, Missouri 64108

Telephone: (816) 474-6550

Facsimile: (816) 421-5547

Attorney for Hexion Specialty Chemicals, Inc.,
alleged successor-in-interest to named
Respondent Borden Chemical Co.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 28th day of September, 2009 a true and correct copy of the foregoing NOTICE OF FILING, MOTIONS FOR ADMISSION *PRO HAC VICE*, APPEARANCES and MOTION FOR EXTENSION OF TIME were issued for filing to the Clerk of the Illinois Pollution Control Board by Federal Express at the following address:

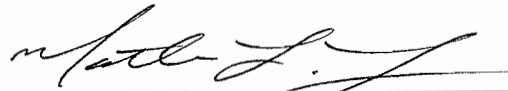
Mr. John Therriault, Assistant Clerk of the Board
Illinois Pollution Control Board
James R. Thompson Center, Suite 11-500
100 West Randolph Street
Chicago, IL 60601-3218

Copies were also served this same date by Federal Express upon:

Carol Webb
Hearing Officer
Illinois Pollution Control Board
1021 No. Grand Avenue East
P.O. Box 19274
Springfield, IL 62794-9274

Matthew J. Dunn, Chief
James L. Morgan, Sr. Assistant
Attorney General
Environmental Bureau
Environmental Enforcement/Asbestos
Litigation Division
500 So. Second Street
Springfield, IL 62706

and served upon the parties identified on the attached Service List by U.S. Mail.



Attorney for Hexion Specialty Chemicals,
Inc., alleged successor-in-interest to named
Respondent Borden Chemical Co.

SERVICE LIST

A.E. STALEY MANUFACTURING CO.
(see Tate and Lyle Ingredients Americas, Inc.)

ARAMARK UNIFORM SERVICES, INC.
Jennifer T. Nijman
Susan M. Franzetti
Nijman Franzetti LLP
10 S. LaSalle Street, Suite 3600
Chicago, IL 60603

ARCHER DANIELS MIDLAND, INC.
c/o CT Corporation system
208 S. LaSalle Street, Ste. 814
Chicago, IL 60604

BELL SPORTS, INC.
John E. Collins
Husch Blackwell Sanders, LLP
190 Carondelet Plaza, Ste. 600
St. Louis, MO 63105-3441

BRIDGESTONE FIRESTONE, INC.
c/o CT Corporation system
208 S. LaSalle Street, Ste. 814
Chicago, IL 60604

JERRY CAMFIELD, SR.
2938 Oakmont Drive
Decatur, IL 62521

CATERPILLAR, INC.
Kevin Desharnais
Jennifer Simon
Mayer Brown LLP
71 S. Wacker Drive
Chicago, IL 60606-4637

CLIMATE CONTROL, INC.
Edward Q. Costa
Samuels, Miller, Schroeder, Jackson & Sly
P. O. Box 1400
225 N. Water Street, Ste. 301
Decatur, IL 62525-1400

COMBE LABORATORIES, INC.
Theresa Duckett
Locke Lord Bissell & Liddell
111 S. Wacker Drive
Chicago, IL 60606

GENERAL ELECTRIC RAILCAR SERVICES CORP.
c/o Illinois Corporation System
801 Adlai Stevenson Drive
Springfield, IL 62703

P&H MANUFACTURING, INC.

Edward Dwyer
Hodge Dwyer & Driver
3150 Roland Avenue
P.O. Box 5776
Springfield, IL 62705-5776

TRINITY RAIL GROUP, INC.

c/o CT Corporation system
208 S. LaSalle Street, Ste. 814
Chicago, IL 60604

WASTE HAULING LANDFILL, INC.

c/o Jerry Camfield, Sr.
2938 Oakmont Drive
Decatur, IL 62521

**TATE AND LYLE INGREDIENTS
AMERICAS, INC.**

(improperly named A.E. Staley Manu. Co.)

James L. Curtis
Jeryl L. Olson
Elizabeth Leifel Ash
Seyfarth Shaw
131 S. Dearborn Street, Ste. 2400
Chicago, IL 60604

TRIPLE S REFINING CORPORATION

David DeCelles
Jeffrey Zeiger
Kirkland & Ellis LLP
300 North LaSalle
Chicago, IL 60654-3406

ZEXEL ILLINOIS, INC.

c/o Kathy Carter, R.A.
625 Southside Drive
Decatur, IL 62525

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

PEOPLE OF THE STATE OF ILLINOIS,

Complainant,

v.

WASTE HAULING LANDFILL, INC.,
JERRY CAMFIELD.
A.E. STALEY MANUFACTURING CO.,
ARCHER DANIELS MIDLAND, INC.,
ARAMARK UNIFORM SERVICES, INC.,
BELL SPORTS, INC.,
BORDEN CHEMICAL CO.,
BRIDGESTONE / FIRESTONE, INC.,
CLIMATE CONTROL, INC.,
CATERPILLAR, INC.,
COMBE LABORATORIES, INC.,
GENERAL ELECTRIC RAILCAR
SERVICES CORPORATION,
P & H MANUFACTURING, INC.,
TRINITY RAIL GROUP, INC.,
TRIPLE S REFINING CORPORATION, and
ZEXEL ILLINOIS, INC.

Respondents.

RECEIVED
CLERK'S OFFICE

SEP 29 2009

STATE OF ILLINOIS
Pollution Control Board

PCB 10-9

(Enforcement – Land, Cost Recovery)

MOTION FOR LEAVE TO APPEAR PRO HAC VICE

Pursuant to Ill. Admin. Code tit. 35, §101.400(a)(3), Mathew L. Larsen, of the law firm Shook, Hardy & Bacon LLC, respectfully requests the Illinois Pollution Control Board's permission to appear *pro hac vice* as counsel for Hexion Specialty Chemicals, Inc., alleged successor-in-interest to named Respondent Borden Chemical Co., in the above-captioned proceedings.

In support of this motion, I, Mathew L. Larsen, state as follows:

1. I am an attorney with the law firm of Shook, Hardy & Bacon, LLP, which has a business address of 2555 Grand Boulevard, Kansas City, Missouri 64108. The firm's main telephone number is (816) 474-6550.

2. I am a member in good standing and licensed to practice law in the State of Missouri since 2007; my Missouri Bar Number is 60168.

3. I am a member in good standing and licensed to practice law in the State of California since 2003; my California Bar Number is 227810.

4. I have never been suspended or disbarred and have never resigned from the practice of law as a result of a disciplinary discharge, investigation, or proceeding in any jurisdiction.

5. No disciplinary proceedings are presently pending against me in any jurisdiction.

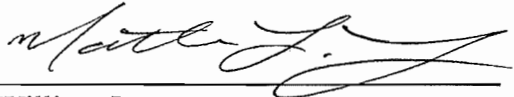
WHEREFORE, I respectfully request this Board admit me to appear *pro hac vice* in this matter on behalf of Hexion Specialty Chemicals, Inc., alleged successor-in-interest to named Respondent Borden Chemical Co.

Dated: September 28, 2009

Respectfully submitted,

SHOOK, HARDY & BACON, L.L.P.

By: _____


William J. Denton, *pro hac vice pending*
Mathew L. Larsen, *pro hac vice pending*
2555 Grand Blvd.
Kansas City, Missouri 64108
Telephone: (816) 474-6550
Facsimile: (816) 421-5547

Attorneys for Hexion Specialty Chemicals, Inc., alleged successor-in-interest to named Respondent Borden Chemical Co.

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

RECEIVED
CLERK'S OFFICE

SEP 29 2009

STATE OF ILLINOIS
Pollution Control Board

PEOPLE OF THE STATE OF ILLINOIS,

Complainant,

v.

PCB 10-9

(Enforcement – Land, Cost Recovery)

WASTE HAULING LANDFILL, INC.,
JERRY CAMFIELD.
A.E. STALEY MANUFACTURING CO.,
ARCHER DANIELS MIDLAND, INC.,
ARAMARK UNIFORM SERVICES, INC.,
BELL SPORTS, INC.,
BORDEN CHEMICAL CO.,
BRIDGESTONE / FIRESTONE, INC.,
CLIMATE CONTROL, INC.,
CATERPILLAR, INC.,
COMBE LABORATORIES, INC.,
GENERAL ELECTRIC RAILCAR
SERVICES CORPORATION,
P & H MANUFACTURING, INC.,
TRINITY RAIL GROUP, INC.,
TRIPLE S REFINING CORPORATION, and
ZEXEL ILLINOIS, INC.

Respondents.

ENTRY OF APPEARANCE

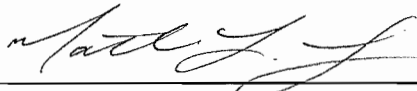
Mathew L. Larsen files his appearance in this proceeding, on behalf of Hexion Specialty Chemicals, Inc., alleged successor-in-interest to named Respondent Borden Chemical Co. Mr. Larsen will be acting as lead attorney for purposes of phone and mail contact pertaining to the proceeding.

A motion for leave to appear in this proceeding *pro hac vice* has been submitted.

Dated: September 28, 2009

Respectfully submitted,

SHOOK, HARDY & BACON, L.L.P.

By: 
William J. Denton, *pro hac vice pending*
Mathew L. Larsen, *pro hac vice pending*
2555 Grand Blvd.
Kansas City, Missouri 64108
Telephone: (816) 474-6550
Facsimile: (816) 421-5547
Attorneys for Hexion Specialty Chemicals,
Inc., alleged successor-in-interest to named
Respondent Borden Chemical Co.

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

PEOPLE OF THE STATE OF ILLINOIS,

Complainant,

v.

WASTE HAULING LANDFILL, INC.,
JERRY CAMFIELD.
A.E. STALEY MANUFACTURING CO.,
ARCHER DANIELS MIDLAND, INC.,
ARAMARK UNIFORM SERVICES, INC.,
BELL SPORTS, INC.,
BORDEN CHEMICAL CO.,
BRIDGESTONE / FIRESTONE, INC.,
CLIMATE CONTROL, INC.,
CATERPILLAR, INC.,
COMBE LABORATORIES, INC.,
GENERAL ELECTRIC RAILCAR
SERVICES CORPORATION,
P & H MANUFACTURING, INC.,
TRINITY RAIL GROUP, INC.,
TRIPLE S REFINING CORPORATION, and
ZEXEL ILLINOIS, INC.

Respondents.

RECEIVED
CLERK'S OFFICE

SEP 29 2009

PCB 10-9

(Enforcement - Land, Air, & Water Pollution Control Board)

STATE OF ILLINOIS
Pollution Control Board

MOTION FOR LEAVE TO APPEAR PRO HAC VICE

Pursuant to Ill. Admin. Code tit. 35, §101.400(a)(3), William J. Denton, of the law firm Shook, Hardy & Bacon LLC, respectfully requests the Illinois Pollution Control Board's permission to appear *pro hac vice* as counsel for Hexion Specialty Chemicals, Inc., alleged successor-in-interest to named Respondent Borden Chemical Co., in the above-captioned proceedings.

In support of this motion, I, William J. Denton, state as follows:

1. I am an attorney with the law firm of Shook, Hardy & Bacon, LLP, which has a business address of 2555 Grand Boulevard, Kansas City, Missouri 64108. The firm's main telephone number is (816) 474-6550.

2. I am a member in good standing and licensed to practice law in the State of Missouri since 1989; my Missouri Bar Number is 38809.

3. I am a member in good standing and licensed to practice law in the State of Kansas since 1989; my Kansas Bar Number is 14056.

4. I was granted license to practice law in the State of Texas in 1973; my Texas Bar Number is 5765600; I am currently inactive in that state.

5. I have never been suspended or disbarred and have never resigned from the practice of law as a result of a disciplinary discharge, investigation, or proceeding in any jurisdiction.

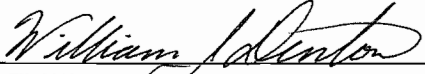
6. No disciplinary proceedings are presently pending against me in any jurisdiction.

WHEREFORE, I respectfully request this Board to admit me to appear *pro hac vice* in this matter on behalf of Hexion Specialty Chemicals, Inc., alleged successor-in-interest to named Respondent Borden Chemical Co.

Dated: September 28, 2009

Respectfully submitted,

SHOOK, HARDY & BACON, L.L.P.

By: 
William J. Denton, *pro hac vice pending*
Mathew L. Larsen, *pro hac vice pending*
2555 Grand Blvd.
Kansas City, Missouri 64108
Telephone: (816) 474-6550
Facsimile: (816) 421-5547
Attorneys for Hexion Specialty Chemicals,
Inc., alleged successor-in-interest to named
Respondent Borden Chemical Co.

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

PEOPLE OF THE STATE OF ILLINOIS,

Complainant,

v.

WASTE HAULING LANDFILL, INC.,
JERRY CAMFIELD.
A.E. STALEY MANUFACTURING CO.,
ARCHER DANIELS MIDLAND, INC.,
ARAMARK UNIFORM SERVICES, INC.,
BELL SPORTS, INC.,
BORDEN CHEMICAL CO.,
BRIDGESTONE / FIRESTONE, INC.,
CLIMATE CONTROL, INC.,
CATERPILLAR, INC.,
COMBE LABORATORIES, INC.,
GENERAL ELECTRIC RAILCAR
SERVICES CORPORATION,
P & H MANUFACTURING, INC.,
TRINITY RAIL GROUP, INC.,
TRIPLE S REFINING CORPORATION, and
ZEXEL ILLINOIS, INC.

Respondents.

RECEIVED
CLERK'S OFFICE

SEP 29 2009

PCB 10-9

(Enforcement – Land Use Control Board)

STATE OF ILLINOIS
Pollution Control Board

ENTRY OF APPEARANCE

William J. Denton files his appearance in this proceeding, on behalf of Hexion Specialty Chemicals, Inc. as alleged successor-in-interest to named Respondent Borden Chemical Co.

A motion for leave to appear in this proceeding *pro hac vice* has been submitted.

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

RECEIVED
CLERK'S OFFICE

SEP 29 2009

STATE OF ILLINOIS
Pollution Control Board

PEOPLE OF THE STATE OF ILLINOIS,

Complainant,

v.

PCB 10-9

(Enforcement – Land, Cost Recovery)

WASTE HAULING LANDFILL, INC.,
JERRY CAMFIELD,
A.E. STALEY MANUFACTURING CO.,
ARCHER DANIELS MIDLAND, INC.,
ARAMARK UNIFORM SERVICES, INC.,
BELL SPORTS, INC.,
BORDEN CHEMICAL CO.,
BRIDGESTONE / FIRESTONE, INC.,
CLIMATE CONTROL, INC.,
CATERPILLAR, INC.,
COMBE LABORATORIES, INC.,
GENERAL ELECTRIC RAILCAR
SERVICES CORPORATION,
P & H MANUFACTURING, INC.,
TRINITY RAIL GROUP, INC.,
TRIPLE S REFINING CORPORATION, and
ZEXEL ILLINOIS, INC.

Respondents.

AGREED MOTION FOR EXTENSION OF TIME

Pursuant to Ill. Admin. Code tit. 35, § 101.522, Hexion Specialty Chemicals, Inc., alleged successor-in-interest to named Respondent Borden Chemical Co. ("Hexion"), submits this Motion for Extension of Time to answer or otherwise respond to the Complaint. In support of this motion, Hexion states as follows:

1. The Attorney General, on behalf of the People of the State of Illinois, served the Complaint on Hexion's representative on or about August 3, 2009.

2. On September 16, 2009, the Attorney General filed its Motion to file its "First Amended Complaint." That Motion has not yet been heard.

3. Counsel for Hexion contacted the Attorney General's office and requested an extension of time to answer or otherwise respond to the Complaint. The Attorney General's office agreed to an extension until November 20, 2009.

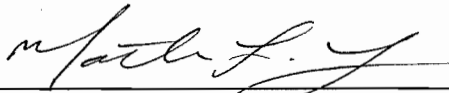
4. As Hexion's response to the Complaint is due on or before this Friday, October 2, 2009, Hexion respectfully requests the Hearing Officer's decision as to this motion for extension of time as soon as is convenient to the Hearing Officer's schedule.

WHEREFORE, Hexion requests the Hearing Officer grant its Motion for Extension of Time to respond to the Complaint until November 20, 2009.

Dated: September 28, 2009

Respectfully submitted,

SHOOK, HARDY & BACON, L.L.P.

By: 

William J. Denton, *pro hac vice pending*
Mathew L. Larsen, *pro hac vice pending*
2555 Grand Blvd.

Kansas City, Missouri 64108

Telephone: (816) 474-6550

Facsimile: (816) 421-5547

Attorneys for Hexion Specialty Chemicals,
Inc., alleged successor-in-interest to named
Respondent Borden Chemical Co.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 28th day of September, 2009 a true and correct copy of the foregoing Agreed Motion for Extension of Time was issued for filing to the Clerk of the Illinois Pollution Control Board by Federal Express, Priority Overnight at the following address:

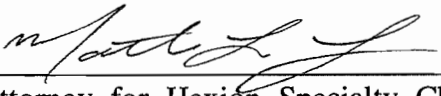
Mr. John Therriault, Assistant Clerk of the Board
Illinois Pollution Control Board
James R. Thompson Center, Suite 11-500
100 West Randolph Street
Chicago, IL 60601-3218

Copies were also served this same date by Federal Express, Priority Overnight, upon:

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

Matthew J. Dunn, Chief
James L. Morgan, Sr. Assistant
Attorney General
Environmental Bureau
Environmental Enforcement/Asbestos
Litigation Division
500 S. Second Street
Springfield, IL 62706

and served upon the parties identified on the attached Service List by U.S. Mail.



Attorney for Hexion Specialty Chemicals,
Inc., alleged successor-in-interest to named
Respondent Borden Chemical Co.

SERVICE LIST

A.E. STALEY MANUFACTURING CO.
(see Tate and Lyle Ingredients Americas, Inc.)

ARAMARK UNIFORM SERVICES, INC.
Jennifer T. Nijman
Susan M. Franzetti
Nijman Franzetti LLP
10 S. LaSalle Street, Suite 3600
Chicago, IL 60603

ARCHER DANIELS MIDLAND, INC.
c/o CT Corporation system
208 S. LaSalle Street, Ste. 814
Chicago, IL 60604

BELL SPORTS, INC.
John E. Collins
Husch Blackwell Sanders, LLP
190 Carondelet Plaza, Ste. 600
St. Louis, MO 63105-3441

BRIDGESTONE FIRESTONE, INC.
c/o CT Corporation system
208 S. LaSalle Street, Ste. 814
Chicago, IL 60604

JERRY CAMFIELD, SR.
2938 Oakmont Drive
Decatur, IL 62521

CATERPILLAR, INC.
Kevin Desharnais
Jennifer Simon
Mayer Brown LLP
71 S. Wacker Drive
Chicago, IL 60606-4637

CLIMATE CONTROL, INC.
Edward Q. Costa
Samuels, Miller, Schroeder, Jackson & Sly
P. O. Box 1400
225 N. Water Street, Ste. 301
Decatur, IL 62525-1400

COMBE LABORATORIES, INC.
Theresa Duckett
Locke Lord Bissell & Liddell
111 S. Wacker Drive
Chicago, IL 60606

GENERAL ELECTRIC RAILCAR SERVICES CORP.
c/o Illinois Corporation System
801 Adlai Stevenson Drive
Springfield, IL 62703

P&H MANUFACTURING, INC.

Edward Dwyer
Hodge Dwyer & Driver
3150 Roland Avenue
P.O. Box 5776
Springfield, IL 62705-5776

TRINITY RAIL GROUP, INC.

c/o CT Corporation system
208 S. LaSalle Street, Ste. 814
Chicago, IL 60604

WASTE HAULING LANDFILL, INC.

c/o Jerry Camfield, Sr.
2938 Oakmont Drive
Decatur, IL 62521

**TATE AND LYLE INGREDIENTS
AMERICAS, INC.**

(improperly named A.E. Staley Manu. Co.)

James L. Curtis
Jeryl L. Olson
Elizabeth Leifel Ash
Seyfarth Shaw
131 S. Dearborn Street, Ste. 2400
Chicago, IL 60604

TRIPLE S REFINING CORPORATION

David DeCelles
Jeffrey Zeiger
Kirkland & Ellis LLP
300 North LaSalle
Chicago, IL 60654-3406

ZEXEL ILLINOIS, INC.

c/o Kathy Carter, R.A.
625 Southside Drive
Decatur, IL 62525