

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

PRAIRIE POWER, INC., (f/k/a Soyland Power Cooperative, Inc.),
Petitioner,
vs.
ILLINOIS ENVIRONMENTAL PROTECTION AGENCY,
Respondent.

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AUG 01 2012
STATE OF ILLINOIS
Pollution Control Board

PCB No. 06-55
(CAAPP Permit Appeal)

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NOTICE

John Therriault, Assistant Clerk
Illinois Pollution Control Board
State of Illinois Center
100 West Randolph Street
Suite 11-500
Chicago, IL 60601


Jane McBride
Sr. Assistant Attorney General
Environmental Bureau
Illinois Attorney General's Office
500 South Second Street
Springfield, IL 62706

Carol Webb
Hearing Officer
Illinois Pollution Control Board
1021 North Grand Avenue East
P.O. Box 19274
Springfield, IL 62794-9174

PLEASE TAKE NOTICE that I have today filed with the office of the Clerk of the Pollution Control Board a Motion to Voluntarily Withdraw Permit Appeal, a copy of which is herewith served upon you.

PRAIRIE POWER, INC. (f/k/a Soyland Power Cooperative, Inc.), Petitioner

BY: RAMMELKAMP BRADNEY, P.C.
its Attorneys

BY: 
Amy L. Jackson, Attorney

Attorneys for Petitioner:
Amy L. Jackson
Rammelkamp Bradney, P.C.
232 West State Street
P.O. Box 550
Jacksonville, IL 62650

PROOF OF SERVICE

The undersigned certifies that the foregoing instrument was served upon all parties to the above cause to each of the attorneys of record herein at their respective addresses disclosed on the pleadings on July 30 _____, 2012, by:

<input checked="" type="checkbox"/> U.S. Mail	<input type="checkbox"/> FAX
<input type="checkbox"/> Hand Delivered	<input type="checkbox"/> Overnight Courier
<input type="checkbox"/> Federal Express	<input type="checkbox"/> Other:

Signature: Paul Wilson

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

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PRAIRIE POWER, INC., (f/k/a Soyland)
Power Cooperative, Inc.),)
)
Petitioner,)
)
vs.)
)
ILLINOIS ENVIRONMENTAL)
PROTECTION AGENCY,)
)
Respondent.)

PCB No. 06-55
(CAAPP Permit Appeal)

MOTION TO VOLUNTARILY WITHDRAW PERMIT APPEAL

COMES NOW the Petitioner, PRAIRIE POWER, INC. (f/k/a Soyland Power Cooperative, Inc.) and submits this Motion to Voluntarily Withdraw Permit Appeal, stating in support whereof, as follows:

1. Petitioner originally filed its CAAPP Permit Appeal with regard to the Title V Permit that was issued by the Illinois Environmental Protection Agency for the Petitioner's facility in Pearl, Illinois, which at the time was a coal-fired electric generating power facility.
2. Since filing of the CAAPP Permit Appeal, Petitioner has decided to close the Pearl facility.
3. In fact, the Pearl facility has now ceased operations.
4. Since the Pearl plant will no longer be operating as a coal-fired electric generating power facility, the need for a CAAPP Permit is moot.
5. Petitioner has made the fact of its facility closure known to the IEPA and understands that the IEPA has no objection to this Motion which would allow for the voluntary withdrawal of the permit appeal.
6. Accordingly, Petitioner requests an Order granting this Motion to Voluntarily Withdraw the pending permit appeal.

WHEREFORE, Petitioner respectfully requests that the Board grant its Motion.

PRAIRIE POWER, INC. (f/k/a Soyland
Power Cooperative, Inc.), Petitioner

BY: RAMMELKAMP BRADNEY, P.C.
its Attorneys

BY: 

Amy L. Jackson, Attorney

Attorneys for Petitioner:

Amy L. Jackson
Rammelkamp Bradney, P.C.
232 West State Street
P.O. Box 550
Jacksonville, IL 62650

Attorney for Respondent:

Jane McBride
Sr. Assistant Attorney General
Environmental Bureau
Illinois Attorney General's Office
500 South Second Street
Springfield, IL 62706

For the Board:

John Therriault, Assistant Clerk
Illinois Pollution Control Board
State of Illinois Center
100 West Randolph Street
Suite 11-500
Chicago, IL 60601

Carol Webb
Hearing Officer
Illinois Pollution Control Board
1021 North Grand Avenue East
P.O. Box 19274
Springfield, IL 62794-9174

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- | | |
|---|--|
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| <input type="checkbox"/> Hand Delivered | <input type="checkbox"/> Overnight Courier |
| <input type="checkbox"/> Federal Express | <input type="checkbox"/> Other: |

Signature: Dale Wilson



RAMMELKAMP BRADNEY

• Attorneys at Law •

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STATE OF ILLINOIS
Pollution Control Board

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July 30, 2012

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

RE: Prairie Power, Inc. (f/k/a Soyland Power Cooperative, Inc.) vs. Illinois
Environmental Protection Agency
PCB No.: 06-55 (CAAPP Permit Appeal)
Our File No.: AJ-2076/125

Dear Mr. Therriault:

Please find enclosed an original and ten (10) copies a Notice of Filing and Motion to Voluntarily Dismiss Permit Appeal. Please file the original and nine (9) copies, and return one file-stamped copy to my office. I have enclosed a self-addressed, stamped envelope for your convenience.

Please do not hesitate to contact me if you have any questions.

Yours truly,

RAMMELKAMP BRADNEY, P.C.

By: 
AMY L. JACKSON

Enclosure as indicated

LARRY D. KUSTER
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ROBERT E. BRADNEY,
OF COUNSEL

RICHARD E. MANN,
OF COUNSEL



L.O. VAUGHT,
1865-1955

CARL E. ROBINSON,
1886-1964

ORVILLE N. FOREMAN,
1904-1972

ALBERT W. HALL,
1912-1986

THEODORE C.
RAMMELKAMP SR.,
1919-2005

*ALSO LICENSED IN IOWA

** ALSO LICENSED IN
MISSOURI