

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD


PEOPLE OF THE PEOPLE OF ILLINOIS,)	
)	
Complainant,)	
)	
v.)	PCB No. 2013 - 12
)	(Enforcement – Air)
NACME STEEL PROCESSING, LLC,)	
a Delaware limited liability corporation,)	
)	
Respondent.)	

NOTICE OF FILING

To: See attached service list
(VIA ELECTRONIC FILING)

PLEASE TAKE NOTICE that I have today filed with the Office of the Clerk of the Pollution Control Board by electronic filing the following Complainant's Motion for Leave to Reply, a copy of which is attached and hereby served upon you.

LISA MADIGAN
Attorney General
State of Illinois



Nancy J. Tikalsky

Dated: May 30, 2013

Nancy J. Tikalsky
Assistant Attorney General
Environmental Bureau
Illinois Attorney General's Office
69 W. Washington Street, Suite 1800
Chicago, Illinois 60602
(312) 814-8567

THIS FILING IS SUBMITTED ON RECYCLED PAPER

Service List

For the Respondent

Edward V. Walsh, III
ReedSmith, LLP
10 South Wacker Drive, Suite 4000
Chicago, Illinois 60606

Illinois Pollution Control Board – electronically by email attachment

Bradley P. Halloran
Hearing Officer
Illinois Pollution Control Board
100 West Randolph Street, Suite 11-500
Chicago, Illinois 60601

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

PEOPLE OF THE PEOPLE OF ILLINOIS,)	
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Complainant,)	
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PEOPLE’S MOTION FOR LEAVE TO REPLY

People, THE ILLINOIS ENVIRONMENTAL PROTECTION AGENCY, by and through its attorney, LISA MADIGAN, Attorney General of the State of Illinois, hereby respectfully seeks leave to file a reply to NACME’s Response to the **People’s Motion to Compel Answer and Responses to Written Discovery and for Protective Order and/or Board’s Supervision Of Discovery** (“Response”). In support of its Motion, People states as follows:

Section 101.500(e) of the Board’s Procedural Rules, 35 Ill. Adm. Code 101.500(e), allows for a reply by a movant in order to avoid prejudice. Nacme’s Response contains multiple factual and legal misrepresentations of the People’s position both in this matter, which require the People’s reply to be corrected. The People believe that these misrepresentations could result in material prejudice and therefore requests that the Hearing Officer grant it leave to file its Reply.

The People requests leave to file its reply by June 21, 2013.

WHEREFORE, People, THE ILLINOIS ENVIRONMENTAL PROTECTION AGENCY, respectfully seeks leave to file the **People's Motion to Compel Answer and Responses to Written Discovery and for Protective Order and/or Board's Supervision Of Discovery** by June 21, 2013.

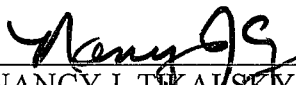
Respectfully Submitted,

THE ILLINOIS ENVIRONMENTAL PROTECTION AGENCY, by

LISA MADIGAN,
Attorney General of the
State of Illinois

MATTHEW J. DUNN, Chief
Environmental Enforcement/Asbestos
Litigation Division

BY:



NANCY J. TIKALSKY
Assistant Attorney General
Environmental Bureau
69 West Washington Street, Suite 1800
Chicago, Illinois 60602
(312) 814-8567

CERTIFICATE OF SERVICE

I, NANCY J. TIKALSKY, an Assistant Attorney General, certify that on the 30th day of MAY 2013, I caused to be served by First Class U.S. Mail the foregoing Notice of Filing and People's Motion for Leave to Reply to the parties named on the attached Service List, by depositing same in postage prepaid envelopes with the United States Postal Service located at 100 West Randolph Street, Chicago, Illinois 60601.



Nancy J. Tikalsky
Assistant Attorney General
Environmental Bureau
Illinois Attorney General's Office
69 W. Washington Street, Suite 1800
Chicago, Illinois 60602
(312) 814-8567