

FBEFORE THE ILLINOIS POLLUTION CONTROL BOARD

ILLINOIS ENVIRONMENTAL)
PROTECTION AGENCY,) AC 12-51
)
Complainant,)
) (IEPA No. 87-12-AC)
v.)
)
NORTHERN ILLINOIS)
SERVICE COMPANY,)
)
Respondent.)

**RESPONDENT’S MEMORANDUM OF LAW IN RESPONSE TO
COMPLAINANT’S MOTION FOR SUMMARY JUDGMENT**

NOW COMES the respondent, NORTHERN ILLINOIS SERVICE COMPANY, (“NORTHERN”) by its attorney, Peter DeBruyne, P.C. and for its Memorandum of Law in Response to Complainant’s Motion for Summary Judgment, states as follows:

I. FACTS

A. Background Facts.

William Hoff (“Hoff”) is Northern’s general field superintendent and is in charge of scheduling crews for all of the work. (Deposition of Paul Munson, (“Munson Dep.”), p. 11”). Hoff runs the field; Paul Munson (“Munson”) runs the office. (Deposition of William Hoff, (“Hoff Dep., p. 6”). Hoff has a civil engineering degree from Purdue and is a licensed engineering intern. (Hoff Dep., pps. 7-8).

Munson’s responsibility is to find bidding opportunities for Northern, preparation of the bids, and managing the projects. (Munson Dep., p. 10). His job does not involve going outside the office building at Northern’s site and supervising people. (Munson Dep., p. 10).

Northern recycles concrete, asphalt, and other masonry materials including brick and stone at its office site. (Hoff Dep., p. 21). Northern makes stone out of its recycled concrete.

(Munson Dep., p. 7). The materials on site include concrete and asphalt pavement, brick, block, and other masonry materials brought in for recycling. (Munson Dep., p. 14). After the recycling operation has been completed, Northern will store the materials which have been recycled, stone and metal, in its yard. See Affidavit of William Hoff attached hereto as Exhibit A. In addition Northern's office site also stores materials for its construction operations such as piping and precast concrete. (Munson Dep., p. 15). The above materials are stored on the ground at Northern's office site and are not sensitive to the elements nor damaged in any way by the elements. (Munson Dep., p. 18). Northern has a yard full of materials which look like the materials photographed in Munson Dep. Exh. 6. (Munson Dep., pps. 38, 55). Hoff noted that the photograph identified as Munson Dep. Exh. 6 showed a few small pieces of concrete or brick and further noted that concrete was poured on the premises that year. (Hoff Dep., p. 25). No evidence exists indicating how long the materials in Munson Dep. Exh. 6 had been at the location in the photo prior to the time the photograph was taken. (Hoff Dep., p. 27).

The documents bates stamped 135 and 136 from Shehane Dep. Exh. 12 are receipts from Veolia ES Orchard Hills Landfill in Davis Junction, Illinois for materials received from Northern on February 8, 2012. Documents bates stamped NISC503-NISC539 attached to William Hoff's Affidavit and previously furnished to complainant as a response to complainant's request for production of documents, are additional material receipts from landfills for Northern's material of various dates. Northern has a plan or a policy of removing to landfills any materials that are intended for disposal. See Affidavit of William Hoff filed contemporaneously herewith at paragraphs two through five.

Inspector Shehane ("Shehane") testified that on March 14, 2012 the allocation of her time in her daily work was 60% on listed tire sites, 15% on permitted facilities, and 25% on complaints and what she saw in the field. (Shehane Dep., pps. 14-15). Her first inspection of

Northern in 2009 (Shehane Dep. Exh. 1) was not because of a complaint nor because Northern was on a list but rather because of tires she saw on its premises as she drove by on Route 20. (Shehane Dep., p. 21). She was not instructed by anyone to inspect Northern. (Shehane Dep., p. 22). Shehane testified that tire storage sites are allowed 14 days from the generation or receipt of the tire to control water accumulation by covering them or drilling holes. (Shehane Dep., p. 32). Shehane testified that there was an informal rule at the EPA that warnings come before citations. (Shehane Dep., p. 48). Shehane visited Northern in December, 2011 because Northern was a registered tire storage site. (Shehane Dep., p. 43). In response to what she observed, Shehane drafted Shehane Dep. Exh. 11 which was a warning and not a citation. (Shehane Dep., pps. 47-48). Shehane testified that her being provided with receipts from landfills was significant to her in showing whether waste was disposed of properly (Shehane Dep., p. 43) as were receipts for disposal of tires to see if there was proper disposal of tires. (Shehane Dep., p. 50). When Shehane visited Northern's site on March 14, 2012, she was supplied with Shehane Dep. Exh. 12 evidencing disposal of tires and waste, presumably of the materials she observed in her visit of December 2011. (Shehane Dep., p. 50). Shehane did not issue a warning to Northern for what she observed on March 14, 2012 but went directly to a citation.

Shehane's specialty with complainant was with the used tire unit until August 2013. (Shehane Dep., p. 8). Shehane stated that a resident placing garbage out for pick up would be enough for her to conclude that the house was an unpermitted landfill. (Shehane Dep., p. 33). She also stated that a resident putting garbage out in a tied up plastic bag for pick up the next day would not be considered by her to be open dumping as she would base her decision on open dumping on the waste being contained in a bag. (Shehane Dep., p. 16). Shehane stated that whether there is "open dumping" of waste depends on whether it is going to be taken away. (Shehane Dep., pps. 18-19). She uses judgment and discretion in determining whether there is

open dumping of waste and she would consider things such as the size and background of a facility, whether there were any prior issues, weather, odor, etc. (Shehane Dep., p. 57). Shehane acknowledged that refuse is always being generated by businesses and she understood it was typical for businesses to put it somewhere before it was taken to the dump. (Shehane Dep., p. 59). In her six years in Rockford she never issued a citation to a business where it generates waste but doesn't take it to the dump right away. (Shehane Dep., pps. 60-61). Regarding landscape waste, Shehane testified she has never issued a citation for trees or limbs falling during fall or spring cleanup at a residence as it is more of a "minor" thing. (Shehane Dep., pps. 83-84).

B. Facts Regarding Tires.

Shehane testified that the problem to be addressed in the EPA law addressing water collecting in tires was the breeding of disease carrying mosquitos. (Shehane Dep., p. 32). With respect to a previous inspection, (Shehane Dep. Exh. 5), where photos showed tires with water collected in them at Northern's site, she testified there was no apparent violation because she did not know if 14 days had passed. (Shehane Dep., p. 42, bates stamped document 044, Shehane Dep. Exh. 5). Specifically regarding the tires pictured in Shehane Dep. Exh. 13, the inspection which lead to the current citation, bates stamped 137, exposure 001 and 002, she testified that she did not know when the tires were placed on the ground. (Shehane Dep. Exh. 78). Munson testified that the tires shown in exposure 5 to Shehane Dep. Exh. 13 were Northern's demolition equipment. The tires are attached to an excavator and swung against large concrete foundations or dropped on concrete slabs to break them up. The tires act as shock absorbers so there is no damage to things you do not want damaged. (Munson Dep., p. 34-35). The large tires shown in Munson Dep. Exhs. 1 and 2 (same as exposures 001 and 002 in Shehane Dep. Exh. 13) would have come from Northern. (Munson Dep., p. 37). Hoff testified that many of the tires he observed were stacked for future use in demolition. (Hoff Dep., p. 14). Hoff testified that the

materials pictured in Munson and Hoff Dep. Exh. 5 were semi tires used for shock absorption when the demolition wrecking balls are swung. (Hoff Dep., p. 19). Northern's Second Supplemental Answers to Complainant's First Interrogatories to Respondent (Munson Dep. Exh. 8), specifically interrogatory answers 4, 5, 6, 7, 8, 10, state that exposures 1 through 3 which are part of Shehane Dep. Exh. 14 (same as exposures 001, 002, and 003 in Shehane Dep. Exh. 13) at bates stamped 137-138 are Northern's equipment, generated from Northern's site, and were removed from a Northern vehicle.

C. Facts Regarding Downed Trees And Tree Limbs.

Shehane testified that that part of the citation issued with respect to the downed trees and/or limbs may not have been issued depending on whether the trees came from Northern and on the length of time they were there. (Shehane Dep., p. 80). She had thought, because of her conversation with Munson, that the trees had been fly dumped. (Shehane Dep. Exh. 81). Had the trees been cut down on her inspection day and on-site generated it would have made a difference. (Shehane Dep. Exh. 79). She has never cited anyone for fall or spring cleanup in connection with this type of material. (Shehane Dep., p. 83).

Munson confirmed that he had told Shehane that the downed trees and/or limbs could have come from someone fly dumping (Munson Dep., p. 24) but he was unsure what he was talking about because he did not know where Shehane was inspecting on the property. (Munson Dep., pps. 27-28. Munson had no knowledge of the trees shown in Munson Dep. Exh. 3 as he had not personally seen them before or after the picture was taken although he knew work was being done that spring. (Munson Dep., p. 31). Munson later learned that the trees were generated from Northern's property and not fly dumped. (Munson Dep., p. 48). Hoff told him that the trees were cleared from Northern property (Munson Dep., p. 50) and said that the trees were cut and removed. (Munson Dep., p. 51).

Hoff testified that the trees were cut down in the fall or spring from Northern's property as it was clearing along the highway and then taken to a site where they were disposed of. (Hoff Dep., p. 17). Hoff testified that the trees and tree limbs were not fly dumped. (Hoff Dep., p. 32).

D. Facts Re Alleged "Waste Pile."

In her inspection of Northern on March 14, 2012, Shehane spent 20 minutes at the site (Shehane Dep., p. 52) canvassing all of the material shown in her photographs. She concluded that the materials depicted in exposure 004 in Shehane Dep. Exh. 14 were waste solely from her observation as she did not know what the materials were used for prior to her taking the picture. (Shehane Dep., pps. 54, 58). She also stated that the Munson statement that "he said that he tries to tell the guys not to dump the demolition debris, but they don't always listen" was a factor in her finding but she would have found waste regardless of the statement. (Shehane Dep., p. 55). She also considered that Northern previously had received a warning notice and what she had previously observed. (Shehane Dep., p. 57).

Shehane admitted that nothing in exposure 004 looked like sludge from a waste treatment plant or from a water supply treatment or from an air pollution control facility or that it was garbage. (Shehane Dep., pp. 64-65.) She further stated that if the material in exposure 004 were in a dump truck she would not have found open dumping because it would have been off the ground and there would have been no potential of entering the environment other than air which it could do even if it were in a garbage truck. (Shehane Dep., p. 66). She could not tell from looking at the material in exposure 004 what could be emitted into the air nor what could be emitted into the ground water. (Shehane Dep., p. 67). With respect to Northern's intent on what she determined was waste, Shehane stated:

"Q. What did you think they were going to do with it?

A. I believed eventually it would be disposed of." (Shehane Dep., p. 69).

She asked no questions as to when the materials in exposure 004 were placed on the ground. (Shehane Dep., p. 69). Shehane had her in mind only “open dumped waste” when she wrote “litter” in her report. (Shehane Dep., p. 70). Regarding construction debris, Shehane pointed out stones or concrete or brick which she circled at number three on exposure 004. (Shehane Dep., p. 71). She concluded that the materials resulted from construction or demolition activities because she saw lumber, metal, and piping which are materials related to structures and that Northern was a construction demolition company. (Shehane Dep., p. 72). She could not tell if the material in the exposure was “nonhazardous painted, treated, and coated wood and wood products” as she just saw “wood.” (Shehane Dep., p. 74). She did not see any wall coverings or plaster and did not have drywall in mind. (Shehane Dep., pps. 74-75). She did not see or have in mind plumbing fixtures, nonasbestos insulation, roofing shingles, asphalt, glass or electrical wiring. (Shehane Dep., pps. 75-76).

Hoff pointed out that some of the materials in the “waste pile” materials were comprised of packaging material from the shop and from job sites. Additionally, there was scrap pipe from job sites. (Hoff Dep., p. 12). Hoff pointed out that all of the materials in the pile came from Northern’s yard except for the small bit of plastic pipe and the silt fence. (Hoff Dep., p. 25). The silt fence was used as equipment in Northern’s work for erosion control (Hoff dep., p. 23). The wood pallets in the photos supported materials shipped to Northern for its work either at the yard or at a work site (Hoff Dep., p. 23) as almost everything received at the yard comes on pallets (Hoff Dep., p. 24). Hoff pointed out that the dimensional lumber in the photos came from the yard inasmuch as it was equipment used for pouring of concrete at the yard that year. (Hoff Dep., p. 24). Hoff identified a 12 x 12 piece of oak which is other equipment used as Northern’s site and used for cribbing to block equipment in the air. (Hoff Dep., p. 24). There is plastic visqueen in the picture which came from concrete that was poured on the site. (Hoff Dep., p.

25). Hoff did not know how long the materials were there. Hoff stated that the material was not open dumped waste and that it was not inasmuch as Northern did not intend to dispose of it at Northern's site nor was the material off-site generated waste. (Hoff Dep., p. 31). Hoff also pointed out that demolition materials are never dumped at Northern's site. (Hoff Dep., p. 31).

II. ARGUMENT

A. Standard For Summary Judgment.

Section 2-1005 of the Code of Civil Procedure, 735 ILCS 5/2-1005, provides that summary judgment will lie in those cases where there is no "genuine issue as to any material fact and... the moving party is entitled to judgment as a matter of law." "Summary judgment should be granted only if the pleadings, affidavits, depositions, and admissions on file, when viewed in the light most favorable to the nonmovant, show that there is no genuine issue of material fact and that the movant is entitled to a judgment as a matter of law." *Bier v. Leanna Lakeside Property Ass'n.*, 305 Ill.App.3d 45, 50, 711 N.E.2d 773, 777 (2nd Dist. 1999). "Summary judgment is a drastic means of resolving litigation and should be allowed only when the right of the moving party is clear and free from doubt." *Id.* at 778. "Where a reasonable person could draw divergent inferences from undisputed facts, summary judgment should be denied." *Outboard Marine Corp. v. Liberty Mut. Ins. Co.*, 154 Ill.2d 90.

B. Shehane's Background And Her Description Of Her Methodology Of Inspection Prevents The Entry Of Summary Judgment.

Before addressing the substance of Northern's alleged violations of the Environmental Protection Act ("Act"), it should be noted that summary judgment should be denied based solely on Shehane's explanation of her background and methodology in inspections. Though the vast majority of Shehane's work (75%) arose from lists of businesses she had been furnished for inspection (and Northern was not initially on a list) and no one had complained to complainant about Northern's

business, she on her own chose to investigate Northern in 2009. Both at that time and at the time of her inspection in 2012, she specialized in the tire unit of complainant. She only started in the construction debris field in 2013. Shehane acknowledged that businesses were always generating waste, that it was typical for such businesses to put it somewhere before it was dumped, and that in her six years of experience in Rockford she had never issued a citation to a business where waste was generated but it was not taken to the dump right away. Though Shehane admitted she did not know what the materials in the alleged "waste pile" were used for prior to her taking her photographs nor when the materials were deposited on the ground in the photograph, though she spent only 20 minutes at Northern looking at all of the stuff in the photographs, landscape materials, tires, and "waste pile," and though she reached her conclusions solely from observation and not talking to anyone, she concluded that Northern had violated the law. And she concluded this despite her admission that she thought that Northern would "dispose of" the waste pile eventually. Given these admissions, and without consideration of the specific content of any of the landscape materials or "waste pile," a genuine issue of fact exists. If, as Shehane testified, "open dumping" depends on whether it is going to be taken away and, if as Shehane testified, she assumed Northern was going to take away the "waste pile," then the citation should not have been issued. If she has never issued a citation to a business because of waste generation at its facility and her understanding that such waste is not taken to the dump right away, then Northern should not have been cited in this instance. If Shehane did not know when the materials in question were deposited on the ground nor what they were, a fact issue exists because citations are improperly issued if "waste materials" are intercepted by an inspector in midair from the time the "waste" leaves the hand and alights on the ground. As Shehane acknowledged, she uses judgment and discretion in determining whether there is an open dumping of waste. Such judgment and discretion should be at a minimum the object of a full trial and not just

conceded to complainant that the judgment and discretion has been correctly exercised. Thus summary judgment should be denied based on the preliminary testimony of Shehane herself.

C. Genuine Issues Of Fact Or Law Exists Regarding Northern's Alleged Violation Of 415 *ILCS* 55(k)(1).

Shehane testified that tire storage sites were allowed 14 days from the generation of a tire or its receipt to control water accumulation by covering them or drilling holes. Indeed, even though a previous Shehane inspection of Northern resulted in a Shehane photograph showing water in a tire, she testified there was no apparent violation because she did not know whether 14 days had passed from the receipt or generation of the tire. Nevertheless, Shehane's inspection at issue here resulted in a citation for water in a tire even though there is no evidence presented that Shehane know how long the tires in question had been at Northern's site.

Further, Shehane transgressed complainant's informal rule of warnings before citations by citing Northern for water in tires with no warning given. Recall here that Shehane testified the point of the warning was to bring potential violators into compliance and compliance is precisely what Northern had demonstrated to Shehane on every previous visit from Shehane where she had issued a warning citation. Even though Northern furnished Shehane with receipts for tire disposals on her visit of March 14, 2012, she proceeded to issue a citation. This creates a factual issue whether Northern violated the law at all or whether complainant engaged in selective enforcement.

Shehane picked out only one or two tires containing water and this occurred in the middle of March when no one would claim mosquito season is in bloom. The small number of tires in evidence and the zero chance of the issue at concern, mosquitos, would make any violation de minimis and not worthy of a citation.

Finally, and most importantly, Shehane and complainant have repeatedly referred to the tires photographed by Shehane as "used" tires. This is not correct. The citation references under

“VIOLATIONS” at (3): . . . used or waste tires . . .” 415 *ILCS* 5/54.08 defines a “Reused tire” as a “a used tire that is used again, in part or as a whole, by being employed in a particular function or application as an effective substitute for a commercial product or fuel without having been converted.” The uniform testimony from Hoff and Munson as well as Northern’s interrogatory answers established that the photographed tires were actually Northern’s equipment and used as shock absorbers around hardened equipment used for demolishing structures and concrete slabs. Additionally, the tires were also used as a base for temporary light poles or temporary power at construction sites. The tires bases are filled with concrete and thus provide stability for an upright pole which is centered in the tire. As such, the tires which were the subject of the citation were not “used” but rather Northern’s equipment, no more capable of a “used” tire violation of the Act than had it been an end loader which had gathered melting snow on one of its horizontal surfaces. Thus, not only are there issues of fact in connection with the allegation of 415 *ILCS* 55(k)(1), it appears there is no basis at all for the matter with respect to tires proceeding to trial.

D. Complainant Apparently Has Given Up On Its Summary Judgment Intention Regarding Downed Tire Limbs; In All Events, Factual Issues Exist Preventing Summary Judgment.

Complainant in its brief has said not one word about the photographs of downed tree limbs on Northern’s site. The facts permit the inference that the tree limbs had been cut the day of Shehane’s arrival. Additionally, the facts permit the inference that the tree limbs had been removed the day of Shehane’s arrival but after her exit from Northern’s premises. Clearly spring and fall cleanup are not the objects of complainant’s focus when it comes landscape waste. Shehane herself testified that her report with respect to the citation assumed that the trees had been “fly dumped” when the testimony established that they had not been. She also noted that it would have made a difference had the trees been generated on site and cut down that day. She further noted that she had never cited anyone for

fall or spring cleanup in connection with the type of material photographed. Given all this, at a minimum fact issues exist and the summary judgment should be denied.

E. Complainant's Motion With Respect To The "Waste Pile" Fails As A Matter Of Law; Additionally, There Are Factual Issues Presenting Summary Judgment.

The citation alleges as follows under "VIOLATIONS:"

. . . (1) That Respondent caused or allowed the open dumping of waste in a manner resulting in litter, a violation Section 21(p)(1) of the Act, 415 *ILCS* 5/21/(p)(1)(2010).

(2) That Respondent caused or allowed the open dumping of waste in a manner resulting in deposition of general construction or demolition debris or clean construction or demolition debris, a violation of Section 21(p)(7) of the Act, 415 *ILCS* 5/21/(p)(7)(2010).

The citation is not more specific as to whether these allegations relate to the tires, the downed tree limbs, or the "waste pile," but for the purposes of this section of Northern's response, it will be assumed that the allegations relate to the "waste pile." (See Shehane Dep. Exh. 13, bates stamped 010, exposure #004; Shehane Dep. Exh. 14, bates stamped 138, exposure #004; Shehane Dep. Exh. 14, bates stamped 143; Munson Dep. Exh. 6). The key terms in the quoted material are "open dumping," "waste," "litter," "deposition," "general construction or demolition debris," and "clean construction or demolition debris."

To begin, "open dumping" is critical to the establishment of a violation under allegations 1 and 2 above. "Open dumping" is defined at 415 *ILCS* 5/3/305 as "the consolidation of refuse from one or more sources at a disposal site that does not fulfill the requirements of a sanitary landfill." Here, Shehane was persistent in insisting that not only was Northern's site an "unpermitted landfill," but so also would be a residence which placed garbage out for pickup. Given that admission, the relevant definition is contained a 35 Ill. Admin. Code 810.103 which defines "open dumping" in relevant part as:

The discharge, deposit, injection, dumping, spilling, leaking or placing of any solid waste into or on any land or water or into any well such that solid waste or any constituent of the solid waste may enter the environment by being emitted into the area or discharged into any waters, including the ground water. If the solid waste is accumulated and not confined or contained to prevent its entry into the environment, or there is no certain place for its disposal elsewhere, such accumulation will constitute disposal.

Assuming *arguendo* that the photographed material constituted “solid waste,” the testimony from all witnesses, Shehane, Hoff, and Munson, was consistent that the “waste pile” was not intended for “disposal” at Northern’s site, but was intended to be taken away to a landfill. Hoff’s Affidavit demonstrates that Northern has had a plan and practice of removing materials from its yard to a landfill. First, Shehane testified that receipts from landfills were significant in demonstrating to her whether waste was disposed of properly. The evidence showed that landfill receipts were consistently provided to both Shehane and the EPA demonstrating Northern’s consistent removal of materials to landfills. Thus, according to Shehane, whatever previously had been at Northern’s site had been disposed of properly. Secondly, Shehane admitted that whether there is “open dumping” of waste depended upon whether it was going to be taken away. In this regard, Hoff noted that he disagreed with the citation alleging open dumped waste because Northern intended to dispose of it at a site other than Northern’s office site. Shehane herself testified as to her expectation of Northern’s intention with respect to the “waste pile,” that “eventually it would be disposed.” The court in *E.P.A. v. Pollution Control Board*, 162 Ill.Dec. 401, 219 Ill.App.3d 975 (5th Dist. 1971) held that a building demolition site could not be regarded as a “disposal site” if the resulting waste were cleared away to another location before being allowed to be dissipated back into the environment or emitted into the air (citation). Similarly here, whatever the contents of the “waste pile,” it could not be regarded as a “disposal site” when the evidence was that it was going to be cleared away to another location for disposal.

In *Jerry Russell Bliss, Inc. v. E.P.A.*, 138 Ill.App.3d 699, 192 Ill.Dec. 911 (Ill.App. 5th 1985), the court noted: Consequently proof of prior use or origin of substance must be present to establish that a substance is a ‘waste’” (138 Ill.App.3d 699, 706). Here, a principal weakness of complainant’s case is that Shehane admitted she had no knowledge of the prior use of the materials in the “waste pile” before her observation, asked no questions of anyone as to the use of the materials, and did not know when they had been deposited on the ground. She did not ask when the material was going to be taken away. “Open dumping” depends upon all of these facts. Further, Shehane’s admission that she has never cited a business for generating waste even if not taken to the dump right away militates against the finding of open dumping here. Summary judgment must be denied because Northern had a plan and practice of removing material from its site to a landfill. Summary judgment must be denied because of the scant evidence of the prior use of the materials. When the evidence was produced during discovery, it turned out that the materials were not either general construction or clean construction or demolition debris. Summary judgment must be denied because complainant has produced no evidence of how long the “waste pile” existed before it was taken away to a landfill. Finally, summary judgment must be denied because the material was confined or contained to prevent its entry into the environment as shown by the photographs and as testified to by Munson.

Bypassing again for the moment the contents of the material referenced as a “waste pile,” such material did not result in “litter.” “Litter” under the Act should be and has been construed in *pari materia* with the use of that term in the Litter Control Act, 415 ILCS 105 et seq. “Litter” under the Litter Control Act requires “discarding” and the evidence establishes that Northern did not discard the “waste pile” but intended to and did dispose of it at a landfill. Further, at 415 ILCS 105/4 the Litter Control Act provides an exception from the depositing of litter if “the person is the owner . . . and does not create a public health or safety hazard, a public nuisance, or a fire hazard. . .” Here of course there

was no complaint from anyone regarding the “waste pile” on Northern’s site and no insinuation that it created a public health or safety hazard, a nuisance, or a fire hazard. Further, Section 6 of the Litter Control Act, 415 *ILCS 105/6* provides that there is an exception to the accumulation of litter upon an owner’s land if the litter cannot be “blown or otherwise carried by the natural elements onto the real property of another person.” The photographs of the “waste pile” reveal, as does the lack of testimony from anyone, that the materials could not be blown onto the real property of another person. Therefore, viewing the Litter Control Act and the Act in *pari materia*, the complainant has not established that the material in the waste pile was “litter” which properly is the subject of a citation.

Again, bypassing the precise contents of the “waste pile,” the complainant alleges a resultant of “deposition of general construction or demolition debris or clean construction or demolition debris . . .” 415 *ILCS 5/3.160* defines in relevant part general construction or demolition debris as that material “resulting from the construction, remodeling, repair, and demolition of utilities, structures and roads, limited to the following . . .” Further, the definition in that section of clean construction or demolition debris is in part “uncontaminated broken concrete without protruding metal bars, bricks, rock, stone, reclaimed or other asphalt pavement, or soil generated from construction or demolition activities . . .” Shehane reached her conclusion of construction debris only from a 20 minute observation of Northern’s entire site. A factual inference could be she spent less than a few minutes observing the “waste pile.” She jumped to the conclusion that the material she was looking at resulted from construction or demolition. Yet the uniform evidence and testimony was that the material she was looking at did not result from construction or demolition. Hoff testified without contradiction that demolition materials are never dumped at Northern’s office site. Rather, it arose from packaging material containing equipment or supplies delivered to Northern either at its office or at construction sites, parts of plastic material which was original material used by Northern in sewer work, bricks, rock or stone which resulted from its recycling operation at its office site, or other equipment such as

silt fencing used to prevent environmental harm or plastic visqueen to cover freshly laid concrete at its office site. Thus the materials do not meet the definitions of “general construction or demolition debris” or “clean construction or demolition debris” and the citation fails.

Turning to the contents of the “waste pile,” it was composed of packaging material, equipment, supplies, and recycled material of Northern, not “waste” material as that term would be commonly understood. Shehane spent a brief amount of time observing the waste pile and never inquired as to its previous use or the date of its deposition at Northern. An inference would be that she was influenced by what she had seen at Northern on her previous inspections. Recall that Northern operates a recycling operation at the office site, completely unobjectionable according to Shehane, which recycles materials from various construction contractors into its component parts such as metal, stone, brick, etc. Materials for the recycling are stored at Northern’s site as well as are the materials produced from the recycling. Thus, again going to the “waste pile,” any pointing to bricks, concrete, stones, etc. are the materials destined for the recycling or resulting from the recycling.

The wooden materials were packaging pallets upon which Northern’s equipment and supplies arrived. The 12 x 12 oak was equipment used in connection with the recycling operation. Likewise, the plastic visqueen was used as a tool in covering the cement poured on site and plastic piping portions were original equipment of Northern used in its construction work. The fencing material was used as a tool on construction site to prevent other environmental harm. In sum, there was no “construction debris” or commonly understood “waste” in the pile. Nor was any of the material destined for final deposit at Northern. What Shehane was looking at was no different from what she would have seen had she peered into the backyard of a homeowner who the day before had received materials for constructing a backyard deck. She would have seen wooden pallets, bricks and/or flag stones, perhaps chipped bricks and/or flag stones, packaging material etc. Is there any question that Shehane would not have considered for a moment the citation of that homeowner for the deposition of

“waste?” Shehane did not take the time to ask questions as to the source of the materials nor did she have any expertise in the type of work Northern was doing on the day of her inspection. This lead her to conclude that the materials she was looking at was far different from what the “waste pile” actually consisted of and lead her into concluding that it was construction and demolition debris. Shehane noted that she has never issued a citation against a business which generated waste at its own site for disposal later elsewhere. Here, the materials she was looking at were not “waste” but rather equipment, supplies, and packaging for the same generated generally at Northern’s site. It was a step down even from that material which Shehane stated that she has never cited.

The definition of “disposal” at 35 Ill. Admin. Code 810.103 also includes a requirement that the waste “may enter into the environment by being emitted into the air or discharged into any waters, including ground water.” Complainant has presented no evidence that the “waste pile” did or could contain anything that could be emitted into the air or discharged into the water. Shehane could identify nothing in the “waste pile” that could be emitted into the air as a contaminant nor could she identify anything other than “potentially,” and even that a guess, which could be emitted into ground water. (Shehane Dep., p. 67). Munson testified that the materials stored on the ground in the yard are not sensitive to the elements. (Munson Dep., pps. 17-18).

Regarding whether the materials in the “waste pile” actually constituted “waste” under 415 *ILCS* 5/3.535, Shehane testified that the material was not “garbage, sludge from a waste treatment plant, water supply treatment plant or air pollution control facility,” all terms used in the definition of “waste.” The material had not been “discarded” as Northern had plans to “discard it” in a landfill and Shehane herself adverted to her own expectation that this would happen. The materials did not result from “industrial, commercial, mining and agricultural operations.” Thus complainant has not established that the “waste pile” contained “waste.” To the extent that an isolated item in the “waste pile” could be designated as “waste” as a guess, such designation would be de minimis and not worthy

of a citation. Summary judgment should be denied on the basis that no "waste" existed in the "waste pile."


Northern is a construction and demolition contractor. Its recycles materials at the site which is the subject of the citation. Its workers do not dress in tuxedos and take a break for tea and crumpets at 4:00 p.m. The materials which are the subject of complainant's Motion are a normal part and parcel of the business of Northern. There is no evidence of disposal or of intent to dispose of any of the materials at Northern's site.

III. CONCLUSION

Summary judgment requires a clear right to relief under the law and no genuine issue of fact. Here there are issues of law which prevent summary judgment even if the facts were as complainant would have them. They are not. Summary judgment should be denied.

NORTHERN ILLINOIS SERVICE COMPANY,
Respondent,

By Peter DeBruyne, P.C.

By 

Peter DeBruyne, Its Attorney

Peter DeBruyne
A.R.D.C. #0599840
Peter DeBruyne, P.C.
838 North Main Street
Rockford, IL 61103
Telephone (815) 964-3810
Fax (815) 964-3813
Email: pdebruyne@sbcglobal.net

CERTIFICATE OF SERVICE

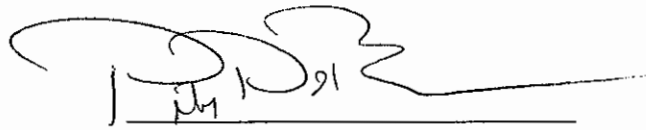
Peter DeBruyne hereby certifies that he has served a copy of the foregoing RESPONDENT'S MEMORANDUM OF LAW IN RESPONSE TO COMPLAINANT'S MOTION FOR SUMMARY JUDGMENT upon:

John T. Therriault (E-Filed)
Assistant Clerk

Bradley P. Halloran
Hearing Officer
Brad.Halloran@illinois.gov

Scott B. Sievers
Special Assistant Attorney General
Scott.Sievers@illinois.gov

by e-filing true copies thereof with the Assistant Clerk of the Illinois Pollution Control Party and via e-mail from Rockford, Illinois to the designated e-mail address of record of the attorney after 2:00 p.m. on the afternoon of April 7, 2014.



Peter DeBruyne

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

ILLINOIS ENVIRONMENTAL)	
PROTECTION AGENCY,)	AC 12-51
)	
Complainant,)	
)	(IEPA No. 87-12-AC)
v.)	
)	
NORTHERN ILLINOIS)	
SERVICE COMPANY,)	
)	
Respondent.)	

AFFIDAVIT OF WILLIAM HOFF

STATE OF ILLINOIS)
) SS
COUNTY OF WINNEBAGO)

I, WILLIAM HOFF, under oath, state that I have personal knowledge of the statements contained in this Affidavit, that I am over 21 years of age and of sound mind and body, and if called to testify, I would testify as follows:

1. I am employed as Superintendent for Northern Illinois Service Company and have been so employed continuously for eight years through the date of this Affidavit.
2. I have a degree in civil engineering from Purdue University. Additionally, I am a licensed engineering intern.
3. Northern has a plan and practice of regularly disposing of materials from its office site at 4781 Sandy Hollow Road, Rockford, IL 61109.
4. Documents bates stamped NISC503 through NISC539 attached to this Affidavit are invoices and associated documents from landfills which show a regular disposal of materials from Northern's office site at 4781 Sandy Hollow Road, Rockford, IL 61109 and from its job sites.

5. Northern uses a code "990" to designate materials removed to a landfill from its office site at 4781 Sandy Hollow Road, Rockford, IL 61109. Codes other than "990" designate construction and demolition debris removed from construction and demolition sites directly to the landfills. Construction and demolition debris is never brought to the Northern office site but instead goes from the construction or demolition site directly to the landfill.

6. The tires depicted in exposures 001 and 002 in Shehane Deposition Exhibit 14 are Northern's equipment. They are used as bases to be filled with concrete for temporary light poles or power poles used in work away from Northern's office site. In addition, the tires which are removed from Northern's end loader equipment are destined to be used again as replacement tires in the event of a flat.

7. Northern uses the tires referenced above as part of its equipment. They are not used or waste tires.

FURTHER AFFIANT SAYETH NOT.



WILLIAM HOFF

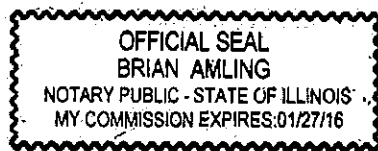
Subscribed and sworn to

before me this 7th day of

April, 2014



Notary Public.



MAILED 12/28/10

2011



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
Used and/or Waste Tire Activity
Notification & Registration Form



Any person who operates a tire storage site or a tire disposal site that contains more than fifty (50) used or waste tires must give notice to the Illinois Environmental Protection Agency (Illinois EPA). The Illinois EPA also maintains an inventory of all tire retailers for compliance assistance purposes.

NOTE: If you have used and/or waste tires at other locations, complete a separate form for each location.

PART A

PLEASE PRINT

Facility Name: Northern Illinois Service Company

Site Number: 2010301120 (Assigned by Illinois EPA)

Street Address: 4781 Sandy Hollow Rd.

Owner's Name: NORTHERN ILLINOIS SERVICE CO.

City, State & Zip: Rockford IL 61109

Street Address: 4781 SANDY HOLLOW RD.

Phone #: 815/ 874-4422

County: Winnebago

City, State & Zip: ROCKFORD, IL 61109

Contact: Paul Munson

Phone #: 815-874-4422

What is the largest number of used or waste tires present at this location at any one time?

Less than 50

Do you sell new and/or used tires at retail at this location? Please place an "X" in the appropriate box.

Yes No

PLEASE CHECK THE APPROPRIATE BOX(ES) FOR YOUR TYPE OF OPERATION:

- Used Tire Storage **Exempt Site** **LESS THAN 50 TIRES ARE STORED AT ANY ONE TIME**
 - Used tires are separated from the vehicle wheel rim at this site and not more than 250 used tires are kept at any one time.
 - Used tires are accepted in trade as part of a sale of new tires and not more than 250 used tires are kept at any one time.
 - This site sells tires at retail in the regular course of business and not more than 250 used tires are kept at any one time.
 - This site sells tires at retail and maintains less than 1,300 recyclable tires, 1,300 tire carcasses, and 1,300 used tires on site and those tires are stored in a building or so they are prevented from accumulating water.
- Used Tire Storage Site
 - This site is a tire retailer and exceeds the accumulation limits identified above.
 - This site is not a tire retailer and maintains more than 50 used tires at any one time.
- Used Tire Processing Site
 - Used tires are altered (e.g., shredded), converted (e.g., manufactured into a commodity other than a tire), or reprocessed (e.g., recapped, retreaded, regrooved) at this site.
- Used Tire Disposal Site
 - This site disposes used tires (except combustion) at this location.
- Used Tire Combustion Site
 - This site combusts used tires on site.

List all registered used tire transporters (and corresponding Illinois EPA registration numbers) used by this facility (attach additional sheet if more space is needed).

Transporter Name: STAR USED TIRE DISPOSAL	Transporter Name: _____	Transporter Name: _____
Registration #: T8450	Registration #: _____	Registration #: _____

This Agency is authorized to require this information under Section 55(c) [415 ILCS 5/55(c)]. Disclosure of this information is required. Failure to do so may result in a civil penalty of not to exceed \$50,000 and an additional civil penalty of not to exceed \$10,000 for each day during which the violation occurs. In addition, it is a Class A misdemeanor to submit false information under Section 44 of the Illinois Environmental Protection Act [415 ILCS 5/44]. This form is approved by the Forms Management Center.

Any person who operates a tire storage site that contains more than 50 used tires must register the site with the Illinois EPA annually by January 1 of each year. The Illinois EPA also maintains an inventory of all tire retailers for compliance assistance purposes.

PART B

1. How are vectors controlled at this site?

Mark all boxes that apply:

Drained of water on day of generation or receipt and stored inside under cover.

Drained of water on day of generation or receipt and processed or altered within 14 days so as not to hold water.

2. Explain in the space provided below the steps taken to handle and process the tires at this site: _____

a. Where are the tires that are removed from your site sent (attach sheet if more space is needed)?

Name: _____

Name: _____

Name: _____

Address: _____

Address: _____

Address: _____

Phone: _____

Phone: _____

Phone: _____

b. How often are the tires removed from your site (e.g., weekly, monthly)? _____

3. Pay to the Agency an annual fee of \$100. Make the check payable to "IEPA for deposit into UTMF." N/A

Amount Enclosed: \$ _____

Check #: _____

PART C

I certify that the above listed site complies with all applicable requirements of Section 55 of the Illinois Environmental Protection Act (415 ILCS 5/1 et. seq) and 35 Ill. Adm. Code 848 and that the information submitted is, to the best of my knowledge, it is true, correct, and complete.

Signature: Paul Munson

Date: 12/14/10

Printed Name: PAUL MUNSON

Use the enclosed, preprinted mailing label to return this completed form along with payment (if applicable) to:

Illinois Environmental Protection Agency
Used Tire Unit
1021 North Grand Avenue East
P.O. Box 19276
Springfield, IL 62794-9276



VEOLIA

ENVIRONMENTAL SERVICES
8290 Highway 251 South
Davis Junction, IL 61020
Return Service Requested

Veolia ES Orchard Hills Landfill, Inc.
www.billonline.com/veoliaes
(815) 874-9000

INVOICE

Date: 01-10-09

ACCOUNT NO T5000272-7	INVOICE NO 150000017013
INVOICE TOTAL \$2,119.40	BALANCE DUE \$8,568.33
EBPP WEB PIN # 0291	SITE NUMBER 0000

NORTHERN ILLINOIS SERVICE CO.
4781 SANDY HOLLOW ROAD
ROCKFORD, IL 61109-2623

DUE DATE 01-30-09

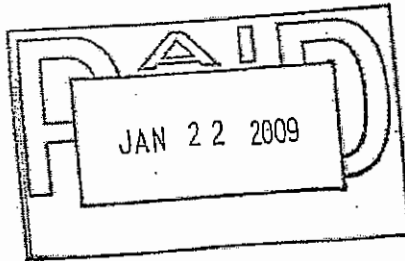
If payment is not received within 30 days of invoice date you may be assessed a service charge of at least \$5.95 or 1.5% of the unpaid balance.



PAGE 1 OF 1

(QESP) 43:V001:000227:001:1000:00000: IM-25011009.TXT

DATE	CODE	DESCRIPTION	REFERENCE	QTY	AMOUNT
01-05-09	02	C & D <i>Hammer Park 2008009</i>	671452 0 TN ✓	2.15	\$82.78
01-06-09	02	C & D <i>Shop 161</i>	671629 0 TN ✓	11.85	\$456.23
01-06-09	02	C & D	671658 0 TN ✓	18.69	\$719.57
01-06-09	02	C & D <i>2008990</i>	671722 0 TN ✓	17.86	\$687.61
**Site Total					\$1,946.19
Fuel Environmental Fee					.00
Material Summary <i>3 lds</i>					\$173.21
C & D					50.55
Invoice Total					\$2,119.40



JOB _____
GL 5009
DEP 1
CC 530
CT 5

CURRENT	30 DAYS	60 DAYS	90 DAYS	BALANCE DUE
\$8,568.33	\$0.00	\$0.00	\$0.00	\$8,568.33



Orchard Hills Landfill
5290 Highway 251 South
Davis Junction, IL 61020

Weighmaster: MAHAGONY
Ticket: 571722T5
6 January 2009 1:13 pm
6 January 2009 1:13 pm
Vehicle: NORT29

000272
NORTHERN ILLINOIS SERVICE CO.
4781 SANDY HOLLOW ROAD
Contract: NORTHERN IL SVC 2009
Reference:

000000 0000 0.00
Inbound - DISPOSAL CHARGE
WINNEBAGO CTY/IL

00 Gross Weight 70,190.00 lb
Stored Tare Weight 34,460.00 lb
Net Weight 35,720.00 lb 17.86 TN

Quantity	Unit	Description	Rate	Total
17.86	TN	02 C & D		

Net Amount:

I hereby certify that this load does not contain any unauthorized waste.

SIGNATURE:



Orchard Hills Landfill
8290 Highway 251 South
Davis Junction, IL 61020

Weighmaster: CINDY
Ticket: 671629T5
6 January 2009 10:27 am
6 January 2009 10:27 am
Vehicle: NORT29

000272
NORTHERN ILLINOIS SERVICE CO.
4781 SANDY HOLLOW ROAD
Contract: NORTHERN IL SVC 2009
Reference:

000000 0000 0.00
Inbound - DISPOSAL CHARGE
WINNEBAGO CTY/IL

00 Gross Weight 58,160.00 lb
Stored Tare Weight 34,460.00 lb
Net Weight 23,700.00 lb 11.85 TN

Quantity	Unit	Description	Rate	Total
11.85	TN	02 C & D		

Net Amount:

I hereby certify that this load does not contain any unauthorized waste.

SIGNATURE:



Orchard Hills Landfill
8290 Highway 251 South
Davis Junction, IL 61020

Weighmaster: MAHAGONY
Ticket: 67165875
6 January 2009 11:33 am
6 January 2009 11:33 am
Vehicle: NORT29

000272

NORTHERN ILLINOIS SERVICE CO.
4761 SANDY HOLLOW ROAD
Contract: NORTHERN IL SVC 2009
Reference:

000000 0000 0.00
Inbound - DISPOSAL CHARGE
WINNEBAGO CTY/IL

Gross Weight 71,840.00 lb
Stored Tare Weight 34,460.00 lb
Net Weight 37,380.00 lb 18.69 TN

Quantity	Unit	Description	Rate	Total
18.69	TN	02 C & D		

Net Amount:

I hereby certify that this load does not contain any unauthorized waste.

SIGNATURE: 



8290 Highway 251 South
Davis Junction, IL 61020
Return Service Requested

Veolia ES Orchard Hills Landfill, Inc.
www.billonline.com/veoliaes
(815) 874-9000

INVOICE

Date: 03-21-09

ACCOUNT NO 150002727	INVOICE NO 150000017355
INVOICE TOTAL \$1,239.38	BALANCE DUE \$7,007.12
EBPP WEB PIN # 0291	SITE NUMBER 0000

NORTHERN ILLINOIS SERVICE CO.
4781 SANDY HOLLOW ROAD
ROCKFORD, IL 61109-2623

DUE DATE 04-10-09

If payment is not received within 30 days of invoice date
you may be assessed a service charge of at least \$5.95
or 1.5% of the unpaid balance.



PAGE 1 OF 1

DATE	CODE	DESCRIPTION	REFERENCE	QTY	AMOUNT
03-17-09	02	C & D	686349 0 TR	14.59	\$561.72
03-17-09	02	C & D	686537 0 TR	15.30	\$589.05
		**Site Total			\$1,150.77
		Fuel Environmental Fee		.00	\$88.61
		----- Material Summary			
		C & D		29.89	\$1,150.77
		Invoice Total			\$1,239.38

Shop Yard

JOB 2009998
GL 5009
DEP 4
CC 530
CT 5

CURRENT	30 DAYS	60 DAYS	90 DAYS	BALANCE DUE
\$7,007.12	\$0.00	\$0.00	\$0.00	\$7,007.12

Please return this portion with your payment. Thank you!

NISC507



Orchard Hills Landfill
8290 Highway 251 South
Davis Junction, IL 61020

Weighmaster: CINDY
Ticket: 686349T5
17 March 2009 8:10 am
17 March 2009 8:10 am
Vehicle: NORT29

000272
NORTHERN ILLINOIS SERVICE CO.
4781 SANDY HOLLOW ROAD
Contract: NORTHERN IL SVC 2009
Reference:

000000 0000 0.00
Inbound - DISPOSAL CHARGE
WINNEBAGO CTY/IL

00 Gross Weight 70,100.00 lb
Stored Tare Weight 41,000.00 lb
Net Weight 29,100.00 lb 14.59 TN

Quantity	Unit	Description	Rate	Total
14.59	TN	02 C & D		

drop yard

Net Amount:

I hereby certify that this load does not contain any unauthorized waste.

SIGNATURE: Bali



Orchard Hills Landfill
8290 Highway 251 South
Davis Junction, IL 61020

Weighmaster: MAHAGONY
Ticket: 68653775
17 March 2009 2:36 pm
17 March 2009 2:36 pm
Vehicle: NORTON

000272
NORTHERN ILLINOIS SERVICE CO.
4781 SANDY HOLLOW ROAD
Contract: NORTHERN IL SVC 2009
Reference:

000000 0000 0.00
. Inbound - DISPOSAL CHARGE
WINNEBAGO CTY/IL

00 Gross Weight 71,500.00 lb
Stored Tare Weight 41,000.00 lb
Net Weight 30,500.00 lb 15.30 TN

Quantity	Unit	Description	Rate	Total
15.30	TN	OE C & D		

Net Amount: *[Signature]*

I hereby certify that this load does not contain any unauthorized waste.

SIGNATURE: *[Signature]*



8290 Highway 251 South
Davis Junction, IL 61020
Return Service Requested

Veolia ES Orchard Hills Landfill, Inc.
www.billonline.com/veoliaes
(815) 874-9000

INVOICE

Date: 11-25-09

ACCOUNT NO T5000272-7	INVOICE NO 150000018782
INVOICE TOTAL \$4,024.30	BALANCE DUE \$4,024.30

Pay by Web: www.billonline.com/veoliaes
Web Pin #: 0291
Site #: 0000

NORTHERN ILLINOIS SERVICE CO.
4781 SANDY HOLLOW ROAD
ROCKFORD, IL 61109-2623

DUE DATE 12-15-09

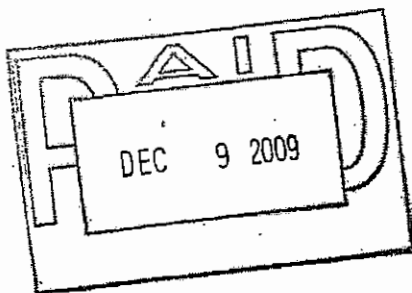
If payment is not received within 30 days of invoice date you may be assessed a service charge of at least \$5.95 or 1.5% of the unpaid balance.



PAGE 1 OF 1
(PDF) 40:7041:014842:001:1000:1000000: 12-25112509.DXF

DATE	CODE	DESCRIPTION	REFERENCE	QTY	AMOUNT
10-25-09		Balance forward			\$1,222.27
10-26-09		Payment received			(\$867.56)
11-09-09		Payment received			(\$354.71)
11-18-09	E2	EXT-C&D-EXTERNAL <i>Yard Clean</i>	745053 0 TN ✓	15.64	\$626.23
11-18-09	E2	EXT-C&D-EXTERNAL	745056 0 TN ✓	15.84	\$634.23
11-18-09	E2	EXT-C&D-EXTERNAL	745085 0 TN ✓	12.86	\$514.91
11-18-09	E2	EXT-C&D-EXTERNAL	745091 0 TN ✓	11.77	\$471.27
11-18-09	E2	EXT-C&D-EXTERNAL <i>Yard Clean</i>	745133 0 TN ✓	12.53	\$501.70
11-21-09	E2	EXT-C&D-EXTERNAL <i>7th Ave Drive</i>	745851 0 TN ✓	10.82	\$433.23
11-21-09	E2	EXT-C&D-EXTERNAL	745861 0 TN ✓	12.74	\$510.11
		**Site Total			\$3,691.68
		Fuel Environmental Fee		.00	\$332.62
		----- Material Summary			
		EXT-C&D-EXTERNAL		92.20	\$3,691.68
		Invoice Total			\$4,024.30

JOB _____
GL 5009
DEP \$
CC 530



CURRENT	30 DAYS	60 DAYS	90 DAYS	BALANCE DUE
\$4,024.30	\$0.00	\$0.00	\$0.00	\$4,024.30



Orchard Hills Landfill
8290 Highway 251 South
Davis Junction, IL 61020

Weighmaster: CINDY
Ticket: 745085T5
18 November 2009 10:02 am
18 November 2009 10:02 am
Vehicle: NORT12

000272
NORTHERN ILLINOIS SERVICE CO.
4781 SANDY HOLLOW ROAD
Contract: NORTHERN IL SVC 2010
Reference:

000000 0000 0.00
Inbound - DISPOSAL CHARGE
WINNEBAGO CTY/IL

00 Gross Weight 66,040.00 lb
Stored Tare Weight 40,320.00 lb
Net Weight 25,720.00 lb 12.86 TN

Quantity	Unit	Description	Rate	Total
12.86	TN	E2 EXT-C&D-EXTERNAL		

Net Amount:

I hereby certify that this load does not contain any unauthorized waste.

SIGNATURE: 



Orchard Hills Landfill
8290 Highway 251 South
Davis Junction, IL 61020

Weighmaster: CINDY
Ticket: 745056T5
18 November 2009 8:22 am
18 November 2009 8:36 am
Vehicle: NORT12

000272
NORTHERN ILLINOIS SERVICE CO.
4781 SANDY HOLLOW ROAD
Contract: NORTHERN IL SVC 2010
Reference:

000000 0000 0.00
Inbound - DISPOSAL CHARGE
WINNEBAGO CTY/IL

00 Gross Weight 71,940.00 lb
Stored Tare Weight 40,260.00 lb
Net Weight 31,680.00 lb 15.84 TN

Quantity	Unit	Description	Rate	Total
15.84	TN	E2 EXT-C&D-EXTERNAL		

Net Amount:

I hereby certify that this load does not contain any unauthorized waste.

SIGNATURE: _____



Orchard Hills Landfill
8290 Highway 251 South
Davis Junction, IL 61020

Weighmaster: MAHAGONY
Ticket: 74513375
18 November 2009 11:47 am
18 November 2009 11:47 am
Vehicle: NORT29

000272
NORTHERN ILLINOIS SERVICE CO.
4781 SANDY HOLLOW ROAD
Contract: NORTHERN IL SVC 2010
Reference:

000000 0000 0.00
Inbound - DISPOSAL CHARGE
WINNEBAGO CTY/IL

Gross Weight 56,060.00 lb
Stored Tare Weight 41,000.00 lb
Net Weight 25,060.00 lb 12.53 TN

Quantity	Unit	Description	Rate	Total
12.53	TN	E2 EXT-C&D-EXTERNAL		

Yard Clean UP

Net Amount:

I hereby certify that this load does not contain any unauthorized waste.

SIGNATURE: *Bob Jones*



Orchard Hills Landfill
8290 Highway 251 South
Davis Junction, IL 61028

Weighmaster: CINDY
Ticket: 745091T5
18 November 2009 10:17 am
18 November 2009 10:17 am
Vehicle: NORT29

000272
NORTHERN ILLINOIS SERVICE CO.
4781 SANDY HOLLOW ROAD
Contract: NORTHERN IL SVC 2010
Reference:

000000 0000 0.00
Inbound - DISPOSAL CHARGE
WINNEBAGO CTY/IL

: 00 Gross Weight 54,540.00 lb
Stored Tare Weight 41,000.00 lb
Net Weight 23,540.00 lb 11.77 TN

Quantity	Unit	Description	Rate	Total
11.77	TN	E2 EXT-C&D-EXTERNAL		

Jeffery Clean
NYS

Net Amount:

I hereby certify that this load does not contain any unauthorized waste.

SIGNATURE: *Belt*



Orchard Hills Landfill
9290 Highway 251 South
Davis Junction, IL 61020

Weighmaster: CINDY
Ticket: 745053T5
18 November 2009 8:30 am
18 November 2009 8:30 am
Vehicle: NQRT29

000272
NORTHERN ILLINOIS SERVICE CO.
4781 SANDY HOLLOW ROAD
Contract: NORTHERN IL SVC 2010
Reference:

000000 0000 0.00
Inbound - DISPOSAL CHARGE
WINNEBAGO CTY/IL

00 Gross Weight 72,200.00 lb
Stored Tare Weight 41,000.00 lb
Net Weight 31,200.00 lb 15.64 TN

Quantity	Unit	Description	Rate	Total
15.64	TN	EXT-C&D-EXTERNAL		

yard clean up

Net Amount:

I hereby certify that this load does not contain any unauthorized waste.

SIGNATURE: *Bob*

VEOLIA
 ENVIRONMENTAL
 SERVICES
 8290 Highway 251 South
 Davis Junction, IL 61020
 Return Service Requested

Veolia ES Orchard Hills Landfill, Inc.
 www.billonline.com/veoliaes
 (815) 874-9000

INVOICE Date: 12-25-09

ACCOUNT NO T5000272-7	INVOICE NO 150000018924
INVOICE TOTAL \$1,657.16	BALANCE DUE \$26,249.70

Pay by Web: www.billonline.com/veoliaes
 Web Pin #: 0291
 Site #: 0000

NORTHERN ILLINOIS SERVICE CO.
 4781 SANDY HOLLOW ROAD
 ROCKFORD, IL 61109-2623

DUE DATE 01-14-10

If payment is not received within 30 days of invoice date
 you may be assessed a service charge of at least \$5.95
 or 1.5% of the unpaid balance.

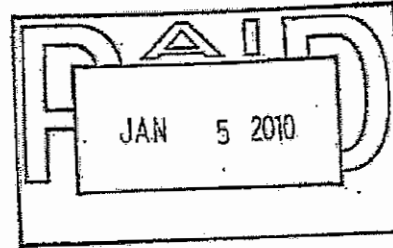


PAGE 1 OF 1
(00SP)40:7028:018835:001:1000:00000: 28-T5122509.TXT

DATE	CODE	DESCRIPTION	REFERENCE	QTY	AMOUNT
12-19-09		Balance forward			\$24,592.54
12-21-09	E2	EXT-C&D-EXTERNAL	751861 0 TH	9.80	\$392.39
12-21-09	F2	EXT-C&D-EXTERNAL	751905 0 TN	18.90	\$756.76
12-22-09	E2	EXT-C&D-EXTERNAL	752165 0 TH	9.09	\$363.96
		**Site Total			\$1,513.11
		Fuel Environmental Fee		.00	\$144.05
		----- Material Summary			
		EXT-C&D-EXTERNAL		37.79	\$1,513.11
		Invoice Total			\$1,657.16

Handwritten notes: 429.67, August 2009/08, Sharp Year, Sharp Year, 2000/09/0, 1,227.49

JOB _____
 GL 5009
 DEP 5
 CC 530
 CT 5



CURRENT	30 DAYS	60 DAYS	90 DAYS	BALANCE DUE
\$26,249.70	\$0.00	\$0.00	\$0.00	\$26,249.70

Please return this notice with your payment. Thank you.



Orchard Hills Landfill
6290 Highway 251 South
Davis Junction, IL 61020

Weighmaster: CINDY
Ticket: 751905T5
21 December 2009 9:05 am
21 December 2009 9:05 am
Vehicle: NORT28

*Stop
UPAD*

000272
NORTHERN ILLINOIS SERVICE CO.
4701 SANDY HOLLOW ROAD
Contract: NORTHERN IL SVC 2010
Reference:

000000 0000 0.00
Inbound - DISPOSAL CHARGE
WINNEBAGO CTY/IL

Gross Weight 78,450.00 lb
Stored Tare Weight 40,660.00 lb
Net Weight 37,800.00 lb 18.90 TN

Quantity	Unit	Description	Rate	Total
18.90	TN	EXT-C&D-EXTERNAL		

Net Amount:

I hereby certify that this load does not contain any unauthorized waste.

SIGNATURE: _____



Orchard Hills Landfill
8290 Highway 251 South
Davis Junction, IL 61020

Weighmaster: CINDY
Ticket: 752165T5
22 December 2009 6:41 am
22 December 2009 6:41 am
Vehicle: NORT28

0000272
NORTHERN ILLINOIS SERVICE CO.
4781 SANDY HOLLOW ROAD
Contract: NORTHERN IL SVC 2010
Reference:

000000 0000 0.00
Inbound - DISPOSAL CHARGE
WINNEBAGO CTY/IL

Gross Weight 52,100.00 lb
Stored Tare Weight 34,000.00 lb
Net Weight 18,100.00 lb 9.09 TN

Quantity	Unit	Description	Rate	Total
9.09	TN	E2 EXT-C&D-EXTERNAL		

Net. Amount:

I hereby certify that this load does not contain any unauthorized waste.

SIGNATURE: 



VEOLIA ES ORCHARD HILLS LANDFILL, INC - T5
8290 HWY 251 S. DAVIS JUNCTION IL 61020

Pay By Phone: 1-877-774-9993
Phone Account #: 000272
Phone Pin #:0890002720000

Thank You For Being A Valued Veolia Customer!

"Our business is environmental services. Our passion is the environment."

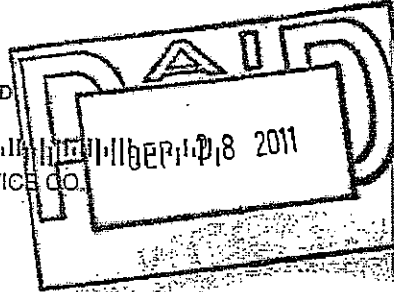
If payment is not received by due date you may be assessed a service charge of at least \$5.95 or 1.5% of the unpaid balance.

RETURN SERVICE REQUESTED

000033 000000005



NORTHERN ILLINOIS SERVICE CO.
4781 SANDY HOLLOW RD
ROCKFORD IL 61109-2623



Account Information	
Account Number	T5000272
Site number	0000
Invoice Date	September 17, 2011
Invoice Number	T50000022079

Previous Balance		\$1,445.02
07/18/11	Lockbox	-\$536.81
07/25/11	Lockbox	-\$908.21
Payments and Adjustments		-\$1,445.02

Account Summary	
Previous Balance	\$1,445.02
Payments/Adjustments	-\$1,445.02
Current Invoice Amount	\$456.25

Amount Due	\$456.25
Due Date	October 06, 2011

Invoice Breakdown	
Current	\$456.25
30 days - past due	\$0.00
60 days - past due	\$0.00
90 days - past due	\$0.00

Contact Us	
(815) 874-9000	
orchardhills.sw@veoliaes.com	

Date	Description	Reference	Qty	Unit Price	Amount
09/13/11	EXT-C&D-EXTERNAL	T5 910826	9.82TN	41.64	408.90
09/17/11	Fuel Environmental Fee at 11.580%		408.90		47.35

Material Summary		Qty	Unit Price	Amount
EXT-C&D-EXTERNAL		9.82		408.90

Current Charges	\$456.25
Amount Due	\$456.25

GL 2011998
 DEP 5009
 CC 4
 CT 530
5

T5110919.101.txt-65-000000005

Any correspondence should be sent directly to the Veolia servicing address at the top of this invoice.

Printed on recycled paper

Veolia ES Orchard Hills Landfill T5
 8290 Highway 251 South
 Davis Junction IL 61020
 815-874-9000
 000272
 NORTHERN ILLINOIS SERVICE CO.
 4781 SANDY HOLLOW ROAD

WO # Route # Seq # Cell #
 0 0 0.00

INVOICE INBOUND
 In Time 9/13/11 11:42 am
 Out Time 9/13/11 12:04 pm

GROSS WEIGHT 60,560.00
 TARE WEIGHT 40,920.00
 NET WEIGHT 19,640.00

Ticket # .910828 Origin: WINNEBAGO CTY/IL

Vehicle: NORT28

Contract: NORTHERN IL SVC 2011

Scale Operator 41310

Reference:

Note:

Qty	UOM	Material	Rate	Mat Total	Tax	Total
9.82	TN	EXT-C&D-EXTERNAL				

Total

Paid

Change Due

Inv Total

Driver Signature _____

Customers Copy



VEOLIA ES ORCHARD HILLS LANDFILL, INC - T5
8290 HWY 251 S. DAVIS JUNCTION IL 61020

Pay By Phone: 1-877-774-9993
Phone Account #: 000272
Phone Pin #:0890002720000

Thank You For Being A Valued Veolia Customer!

"Our business is environmental services. Our passion is the environment."

If payment is not received by due date you may be assessed a service charge of at least \$5.95 or 1.5% of the unpaid balance.

RETURN SERVICE REQUESTED

000030 000000007

NORTHERN ILLINOIS SERVICE CO.
4781 SANDY HOLLOW RD
ROCKFORD IL 61109-2623

MAY 17 2011

Account Information	
Account Number	T5000272
Site number	0000
Invoice Date	May 07 2011
Invoice Number	T50000021445

Previous Balance	\$6,058.05
05/02/11 Lockbox	-\$1,993.18
Payments and Adjustments	-\$1,993.18

Account Summary	
Previous Balance	\$6,058.05
Payments/Adjustments	-\$1,993.18
Current Invoice Amount	\$361.22

Date	Description	Reference	Qty	Unit Price	Amount
05/04/11	EXT-C&D-EXTERNAL	T5 879138	7.74TN	41.64	322.29
05/07/11	Fuel/Environmental Fee at 12.080%		322.29		38.93
	Material Summary				
	EXT-C&D-EXTERNAL		7.74		322.29

Amount Due	\$4,426.09
Due Date	May 26, 2011

Current Charges	\$361.22
Amount Due	\$4,426.09

Invoice Breakdown	
Current	\$4,426.09
30 days - past due	\$0.00
60 days - past due	\$0.00
90 days - past due	\$0.00

Contact Us	
(815) 874-9000	
orchardhills.sw@veoliaes.com	

GL 5009
DEP 1
CC 530
CT 5

T5110509.I.txt-59-000000007

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Printed on recycled paper

Veolia ES Orchard Hills Landfill T5
 8290 Highway 251 South
 Davis Junction IL 61020
 815-874-9000
 000272
 NORTHERN ILLINOIS SERVICE CO.
 4781 SANDY HOLLOW ROAD

WO # 0 Route # 0 Seq # 0.00 Cell #
 INVOICE INBOUND
 In Time 5/4/11 1:14 pm
 Out Time 5/4/11 1:14 pm
 GROSS WEIGHT 56,800.00
 TARE WEIGHT 41,320.00
 NET WEIGHT 15,480.00

Ticket # 879138 Origin: WINNEBAGO CTY/IL

Vehicle: NORT29

Contract: NORTHERN IL SVC 2011

Scale Operator 41309

Reference:

Note:

Qty	UOM	Material	Rate	Mat Total	Tax	Total
7.74	TN	EXT-C&D-EXTERNAL				

Total

Paid

Change Due

Inv Total

Driver Signature _____

Customers Copy



Pay By Phone: 1-877-774-9993
Phone Account #: 000272
Phone Pin #:0890002720000

VEOLIA ES ORCHARD HILLS LANDFILL, INC - T5
8290 HWY 251 S. DAVIS JUNCTION IL 61020

Thank You For Being A Valued Veolia Customer!

RETURN SERVICE REQUESTED

000029 000000006

MAY 12 2011
NORTHERN ILLINOIS SERVICE CO.
4781 SANDY HOLLOW RD
ROCKFORD IL 61109-2623

"Our business is environmental services. Our passion is the environment."

If payment is not received by due date you may be assessed a service charge of at least \$5.95 or 1.5% of the unpaid balance.

Account Information	
Account Number	T5000272
Site number	0000
Invoice Date	April 30, 2011
Invoice Number	T50000024391

Previous Balance		\$6,723.64
04/25/11	Lockbox	-\$440.70
04/25/11	Lockbox	-\$995.88
Payments and Adjustments		-\$1,436.58

Account Summary	
Previous Balance	\$6,723.64
Payments/Adjustments	-\$1,436.58
Current Invoice Amount	\$770.99

Date	Description	Reference	Qty	Unit Price	Amount
04/29/11	EXT-C&D-EXTERNAL	T5-877724	16.52TN	41.64	687.89
04/30/11	Fuel/Environmental Fee at 12.080%		687.89		83.10

Amount Due	\$6,058.05
Due Date	May 20, 2011

Material Summary					
	EXT-C&D-EXTERNAL		16.52		687.89

Invoice Breakdown	
Current	\$6,058.05
30 days - past due	\$0.00
60 days - past due	\$0.00
90 days - past due	\$0.00

Current Charges	\$770.99
Amount Due	\$6,058.05

Contact Us
(815) 874-9000
orchardhills.sw@veoliaes.com

GL 5009
DEP 1
CC 530
CT 5

T5110502.Ltx-57-000000006

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Veolia ES Orchard Hills Landfill T5
 8290 Highway 251 South
 Davis Junction IL 61020
 815-874-9000
 000272
 NORTHERN ILLINOIS SERVICE CO.
 4781 SANDY HOLLOW ROAD

WO # Route # Seq # Cell #
 0 0 0.00

INVOICE INBOUND
 In Time 4/29/11 2:39 pm
 Out Time 4/29/11 2:39 pm

GROSS WEIGHT 70,240.00
 TARE WEIGHT 37,200.00
 NET WEIGHT 33,040.00

Ticket # 877724 Origin: WINNEBAGO CTY/IL

Vehicle: NORT28

Contract: NORTHERN IL SVC 2011

Scale Operator 41309

Reference:

Note:

Qty	UOM	Material	Rate	Mat Total	Tax	Total
16.52	TN	EXT-C&D-EXTERNAL				

Total

Paid

Change Due

Inv Total

Driver Signature _____

Customers Copy

Clean Construction & Recycling, LLC

Invoice

13125 N. Second Street
Roscoe, IL 61073

Date	Invoice #
9/13/2011	6646

Bill To
Northern Illinois Service Co. 4781 Sandy Hollow Road Rockford, IL. 61109

Ship To
Northern Illinois Service Co. 4781 Sandy Hollow Road Rockford, IL. 61109

B.O.L.	Terms	Due Date	Ship	Via	Trailer #	Release #
	Net 20	10/3/2011	9/13/2011			

Quantity	Item Code	Description	Price Each	Amount
2.5	Tip Fee-Construct...	Tip Fee-Construction Ticket #14836 <i>2011040</i>	41.00	102.50
13	Tip Fee-Construct...	Tip Fee-Construction Ticket #14840 <i>2011990</i>	41.00	533.00
			Total	\$635.50

JOB _____
GL <u>5009</u>
DEP <u>1</u>
CC <u>530</u>
CT <u>5</u>

PAID

SEP 28 2011

Phone #	Fax #
815-389-6563	815-389-6463

Next there M
FL

(#12)

Shop

74840
12/29

(+D)

Net 91 08
Gross 91 02600
Net 91 00010

12:05 pm 09/13/11

11/21/60 12:06 pm 09/13/11

26,000

12:05 pm 09/13/11

39,360

65,360

09/20/11

74440 16

Gross:

74440 16

Net:

00 16

Net

11/21/60 12:05 pm 09/13/11

WINNEBAGO LANDFILL COMPANY

5450 WANSFORD WAY #201
ROCKFORD, IL 61109
PH: 815-963-7523 FX: 815-381-5647

DATE 11/15/2012

INVOICE NUMBER 11691420

ACCOUNT # 408448

BILL TO:
NORTHERN ILLINOIS SERVICE
4781 SANDY HOLLOW ROAD
ROCKFORD, IL 61109

REMIT TO:
WINNEBAGO LANDFILL COMPANY
P.O. BOX 5523
ROCKFORD, IL 61125-5523

TERMS: NET 20 DAYS DUE DATE: 12/5/2012

TONS RATE FEE

YARD	JOBS	CE
CODE		
990		

UI	1.00	-598.32	-598.32
UI	1.00	-5,602.32	-5,602.32
2012076	7.98	36.00	287.28
2012076	8.63	36.00	310.68
2012090	8.22	36.00	295.92
2012045	8.31	36.00	299.16
2012045	8.40	36.00	302.40
2012045	10.37	36.00	373.32
2012045	10.46	36.00	376.56
2012045	10.87	36.00	391.32
2012045	12.24	36.00	440.64
2012045	5.08	36.00	182.88
2012085	2.83	36.00	101.88

5009

5

530

5

TOTAL ACCOUNT BALANCE: \$ 3,362.04

INVOICE TOTAL \$3,362.04

MATERIAL SUMMARY	UNITS	AMOUNT
DEMOLITION DEBRIS	93.39	3,362.04

Winnebago Landfill must be advised of disputes concerning this invoice via phone or in writing within 20 days from date of invoice or any right to dispute is waived. Undisputed amounts must be paid within standard invoice terms.

WINNEBAGO LANDFILL COMPANY

8403 LINDENWOOD * ROCKFORD, IL 61109

OFFICE: 815-874-4806 SCALEHOUSE: 815-874-7375 FAX: 815 874 4630

VISIT US ONLINE @ www.winnebagolandfill.com

CHARGE TICKET

DATE: 11/07/12

TICKET #: 1014319

NAME: NORTHERN ILLINOIS SERVICE
ACCT #: 408448
TRUCK#: NIS0029

TIME IN: 02:50 PM TIME OUT: 03:10 PM
WEIGHMASTER: KRISTAL

ORIGIN:
PO/JOB #: *Shop Cleanup (2012990)*

NOTES:

<u>MATERIAL</u>	GROSS WT.:	57,220 LBS	28.61 TONS
039	TARE WT.:	40,780 LBS	20.39 TONS
DEMOLITION DEBRIS	NET WT.:	16,440 LBS	8.22 TONS

Brad C.

AUTHORIZED SIGNATURE:

WINNEBAGO LANDFILL COMPANY

5450 WANSFORD WAY #201
 ROCKFORD, IL 61109
 PH: 815-963-7523 FX: 815-963-7535

DATE 10/15/2012
 INVOICE NUMBER 11568717
 ACCOUNT # 408448

BILL TO:
 NORTHERN ILLINOIS SERVICE
 4781 SANDY HOLLOW ROAD
 ROCKFORD, IL 61109

REMIT TO:
 WINNEBAGO LANDFILL COMPANY
 P.O. BOX 5523
 ROCKFORD, IL 61125-5523

BILLING PERIOD ENDING: 10/15/2012

TERMS: NET 20 DAYS

DUE DATE: 11/4/2012

TICKET	DATE	TRUCK	MATERIAL LABEL	TONS	RATE	FEE
<u>PAYMENTS RECEIVED</u>						
47837	10/12/12		PAYMENT THANK YOU!	1.00	-5,152.32	-5,152.32
<u>CHARGES THIS INVOICE</u>						
1004583 ✓	10/04/12	NIS0028	DEMOLITION DEBRIS	4.95 ✓	36.00	178.20
1004731 ✓	10/04/12	NIS0028	DEMOLITION DEBRIS	2.65 ✓	36.00	95.40
1007262 ✓	10/15/12	NIS0028	DEMOLITION DEBRIS	9.02 ✓	36.00	324.72

2 Lds.
 2012073
 2012990
 1 Ld.



5009
 530
 5

TOTAL ACCOUNT BALANCE: \$ 598.32

INVOICE TOTAL \$598.32

MATERIAL SUMMARY	UNITS	AMOUNT
DEMOLITION DEBRIS	16.62	598.32

Winnebago Landfill must be advised of disputes concerning this invoice via phone or in writing within 20 days from date of invoice or any right to dispute is waived. Undisputed amounts must be paid within standard invoice terms.

WINNEBAGO LANDFILL COMPANY

8403 LINDENWOOD * ROCKFORD, IL 61109

OFFICE: 815-874-4806 SCALEHOUSE: 815-874-7375 FAX: 815 874 4630

VISIT US ONLINE @ www.winnebago landfill.com

CHARGE TICKET

DATE: 10/15/12

TICKET #: 1007262

NAME : NORTHERN ILLINOIS SERVICE

TIME IN: 08:17 AM

TIME OUT: 08:39 AM

ACCT #: 408448

WEIGHMASTER: LINDA

TRUCK#: NIS0028

ORIGIN:

PO/JOB #:

NOTES:

MATERIAL

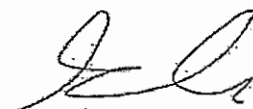
GROSS WT.: 59,200 LBS 29.60 TONS

039

TARE WT.: 41,160 LBS 20.58 TONS

DEMOLITION DEBRIS

NET WT.: 18,040 LBS 9.02 TONS



AUTHORIZED SIGNATURE:



VEOLIA ES ORCHARD HILLS LANDFILL, INC - T5
8290 HWY 251 S. DAVIS JUNCTION IL 61020

Pay By Phone: 1-877-774-9993
Phone Account #: 000272
Phone Pin #:0890002720000

Thank You For Being A Valued Veolia Customer!

"Our business is environmental services. Our passion is the environment."

If payment is not received by due date you may be assessed a service charge of at least \$5.95 or 1.5% of the unpaid balance.

RETURN SERVICE REQUESTED

000024 000000006



NORTHERN ILLINOIS SERVICE CO.
4781 SANDY HOLLOW RD
ROCKFORD IL 61109-2623



Account Information	
Account Number	T5000272
Site number	0000
Invoice Date	March 31, 2012
Invoice Number	T50000022950

Previous Balance **\$1,485.99**
Payments and Adjustments **\$0.00**

Account Summary	
Previous Balance	\$1,485.99
Payments/Adjustments	\$0.00
Current Invoice Amount	\$348.28

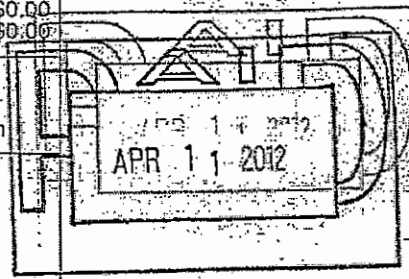
Date	Description	Reference	Qty	Unit Price	Amount
03/30/12	EXT-C&D-EXTERNAL	T5 933173	7.47TN	41.64	311.05
03/31/12	Fuel/Environmental Fee at 1.97%				37.23
	----- Material Summary -----				
	EXT-C&D-EXTERNAL		7.47		311.05

Amount Due **\$1,834.27**
Due Date **April 19, 2012**

Current Charges **\$348.28**
Amount Due **\$1,834.27**

Invoice Breakdown	
Current	\$1,834.27
30 days - past due	\$0.00
60 days - past due	\$0.00
90 days - past due	\$0.00

Contact Us
(815) 874-9000
orchardhills.sw@veoliaes.com



JOB 2012990
GL 5009
DEP \$
CC 530
5

T5120402.101.txt-47-000000006

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VEOLIA ES ORCHARD HILLS LANDFILL, INC - T5
8290 HWY 251 S. DAVIS JUNCTION IL 61020

Pay By Phone: 1-877-774-9993
Phone Account #: 000272
Phone Pin #:0890002720000

Thank You For Being A Valued Veolia Customer!

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If payment is not received by due date you may be assessed a service charge of at least \$5.95 or 1.5% of the unpaid balance.

RETURN SERVICE REQUESTED

000024 000000008



NORTHERN ILLINOIS SERVICE CO.
4781 SANDY HOLLOW RD
ROCKFORD IL 61109-2623



Account Information	
Account Number	T5000272
Site number	0000
Invoice Date	March 17, 2012
Invoice Number	T50000022874

Previous Balance	\$1,322.51
03/08/12 Lockbox	-\$1,322.51
Payments and Adjustments	-\$1,322.51

Account Summary	
Previous Balance	\$1,322.51
Payments/Adjustments	-\$1,322.51
Current Invoice Amount	\$765.76

Date	Description	Reference	Qty	Unit Price	Amount
03/16/12	EXT-C&D-EXTERNAL	T5 931926	16.48	41.64	686.23
03/17/12	Fuel Environmental Fee at 11.590%		686.23		79.53
	Material Summary				
	EXT-C&D-EXTERNAL		16.48		686.23

Amount Due	\$765.76
Due Date	April 05, 2012

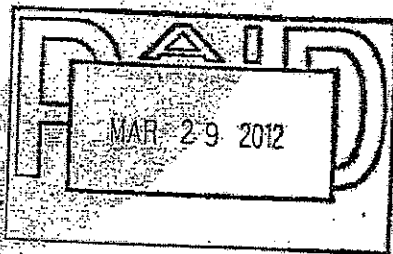
Current Charges	\$765.76
Amount Due	\$765.76

Invoice Breakdown	
Current	\$765.76
30 days - past due	\$0.00
60 days - past due	\$0.00
90 days - past due	\$0.00

Contact Us	
(815) 874-9900	
orchardhills.sw@veoliaes.com	

GL	
DEP	

2012990
5009
530



T5120319.101.txt-47-000000008

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Printed on recycled paper

Veolia ES Orchard Hills Landfill T5
 8290 Highway 251 South
 Davis Junction IL 61020
 815-874-9000
 000272
 NORTHERN ILLINOIS SERVICE CO.
 4781 SANDY HOLLOW ROAD

WO # 0 Route # 0 Seq # 0.00 Cell #

INVOICE INBOUND
 In Time 3/16/12 10:10 am
 Out Time 3/16/12 10:10 am

GROSS WEIGHT 69,980.00
 TARE WEIGHT 37,020.00
 NET WEIGHT 32,960.00

Ticket # 931926 Origin: WINNEBAGO CTY/IL

Vehicle: NORT25

Contract: NORTHERN IL SVC 2011

Reference:

Note:

*Shop Cleanup
 pile*

Scale Operator: 41309

Qty	UOM	Material	Rate	Mat Total	Tax	Total
16.48	TN	EXT-C&D-EXTERNAL				

Total

Paid

Change Due

Inv Total

Driver Signature _____

Customers Copy



VEOLIA ES ORCHARD HILLS LANDFILL, INC - T5
8290 HWY 251 S. DAVIS JUNCTION IL 61020

Pay By Phone: 1-877-774-9993
Phone Account #: 000272
Phone Pin #:0890002720000

Thank You For Being A Valued Veolia Customer!

"Our business is environmental services. Our passion is the environment."

If payment is not received by due date you may be assessed a service charge of at least \$5.95 or 1.5% of the unpaid balance.

RETURN SERVICE REQUESTED

000026 000000007



NORTHERN ILLINOIS SERVICE CO.
4781 SANDY HOLLOW RD
ROCKFORD IL 61109-2623



23

Account Information	
Account Number	T5000272
Site number	0000
Invoice Date	March 25, 2012
Invoice Number	T50000022930

Previous Balance \$765.76
Payments and Adjustments \$0.00

Account Summary	
Previous Balance	\$765.76
Payments/Adjustments	\$0.00
Current Invoice Amount	\$720.23

Date	Description	Reference	Qty	Unit Price	Amount
03/22/12	EXT-C&D-EXTERNAL	T5 932494	7.26TN	41.64	302.31
03/22/12	EXT-C&D-EXTERNAL	T5 932502	8.24TN	41.64	343.11
03/25/12	Fuel/Environmental Fee at 11.590%		645.42		74.81

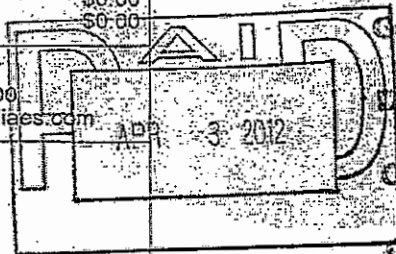
Amount Due \$1,485.99
Due Date April 15, 2012

Material Summary:
EXT-C&D-EXTERNAL 15.50 645.42

Invoice Breakdown	
Current	\$1,485.99
30 days - past due	\$0.00
60 days - past due	\$0.00
90 days - past due	\$0.00

Current Charges 2012990
Amount Due JOB ~~\$720.23~~
\$1,485.99

Contact Us
(815) 874-9000
orchardhills.sw@veoliaes.com



Handwritten notes and markings:
JOB
5009
5
530
5

T5120326.01.txt-51-00000007

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Printed on recycled paper

Veolia ES Orchard Hills Landfill T5
 8290 Highway 251 South
 Davis Junction IL 61020
 815-874-9000
 000272
 NORTHERN ILLINOIS SERVICE CO.
 4781 SANDY HOLLOW ROAD

WO # Route # Seq # Cell #
 0 0 0.00
 INVOICE INBOUND
 In Time 3/22/12 2:26 pm
 Out Time 3/22/12 2:26 pm
 GROSS WEIGHT 53,780.00
 TARE WEIGHT 37,300.00
 NET WEIGHT 16,480.00

Ticket # 932502 Origin: WINNEBAGO CTY/IL

Vehicle: NORT29

Contract: NORTHERN IL SVC 2011

Scale Operator 41310

Reference:

Note:

Qty	UOM	Material	Rate	Mat Total	Tax	Total
8.24	TN	EXT-C&D-EXTERNAL				

Total

Paid

Change Due

Inv Total

Driver Signature _____

Customers Copy

Veolia ES Orchard Hills Landfill T5
 8290 Highway 251 South
 Davis Junction IL 61020
 815-874-9000
 000272
 NORTHERN ILLINOIS SERVICE CO.
 4781 SANDY HOLLOW ROAD

WO # Route # Seq # Cell #
 0 0 0.00

INVOICE INBOUND
 In Time 3/22/12 1:02 pm
 Out Time 3/22/12 1:28 pm
 GROSS WEIGHT 51,820.00
 TARE WEIGHT 37,300.00
 NET WEIGHT 14,520.00

Ticket # 932494 Origin: WINNEBAGO CTY/IL

Vehicle: NORT29

Contract: NORTHERN IL SVC 2011

Scale Operator 41310

Reference:

Note:

Qty	UOM	Material	Rate	Mat Total	Tax	Total
7.26	TN	EXT-C&D-EXTERNAL				

Total

Paid

Change Due

Inv Total

Driver Signature _____

Customers Copy



VEOLIA ES ORCHARD HILLS LANDFILL, INC - T5
8290 HWY 251 S. DAVIS JUNCTION IL 61020

Pay By Phone: 1-877-774-9993
Phone Account #: 000272
Phone Pin #:0890002720000

Thank You For Being A Valued Veolia Customer!

"Our business is environmental services. Our passion is the environment."

If payment is not received by due date you may be assessed a service charge of at least \$5.95 or 1.5% of the unpaid balance.

RETURN SERVICE REQUESTED

000022 000000004

NORTHERN ILLINOIS SERVICE CO.
4781 SANDY HOLLOW RD
ROCKFORD IL 61109-2623

Account Information	
Account Number	T5000272
Site number	0000
Invoice Date	February 11, 2012
Invoice Number	T50000022735

Previous Balance			\$3,554.63
01/16/12	Lockbox		-\$2,918.51
01/30/12	Lockbox		-\$636.12
Payments and Adjustments			-\$3,554.63

Account Summary	
Previous Balance	\$3,554.63
Payments/Adjustments	\$3,554.63
Current Invoice Amount	\$1,322.51

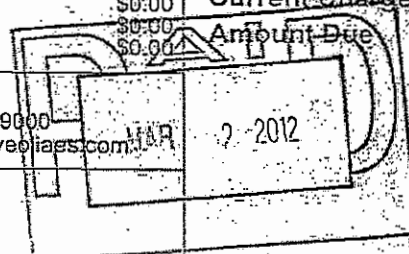
Date	Description	Reference	Qty	Unit Price	Amount
02/08/12	EXT-C&D-EXTERNAL	T5 929227	12.91TN	41.64	537.57
02/08/12	EXT-C&D-EXTERNAL	T5 929241	15.59TN	41.64	649.17
02/11/12	Fuel/Environmental Fee at 11.440%		1186.74		135.77

Amount Due **\$1,322.51**
Due Date **March 01, 2012**

Invoice Breakdown	
Current	\$1,322.51
30 days - past due	\$0:00
60 days - past due	\$0:00
90 days - past due	\$0:00

Material Summary			
EXT-C&D-EXTERNAL	2012990	28.50	1,186.74
Current Charges			\$1,322.51

Contact Us
(815) 874-9000
orchardhills.sw@veoliaes.com



GL 5009 \$1,322.51
DEP 4
CC 530
CT 5

T5120213.101.txt-43-000000004

Any correspondence should be sent directly to the Veolia servicing address at the top of this invoice.

Printed on recycled paper

Veolia ES Ofchard Hills Landfill T5
 8290 Highway 251 South
 Davis Junction IL 61020
 815-874-9000
 000272
 NORTHERN ILLINOIS SERVICE CO.
 4781 SANDY HOLLOW ROAD

WO # 0 Route # 0 Seq # 0.00 Cell #

INVOICE INBOUND
 In Time 2/8/12 1:14 pm
 Out Time 2/8/12 1:14 pm

GROSS WEIGHT 62,840.00
 TARE WEIGHT 37,020.00
 NET WEIGHT 25,820.00

Ticket # 929227 Origin: WINNEBAGO CTY/IL

Vehicle: NORT25

Contract: NORTHERN IL SVC 2011

Reference:

Note:

Yard Cleanup

Scale Operator 41310

Qty	UOM	Material	Rate	Mat Total	Tax	Total
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12.91	TN	EXT-C&D-EXTERNAL				
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Total

Paid

Change Due

Inv Total

Driver Signature _____

Customers Copy

Veolia ES Ofchard Hills Landfill T5
 8290 Highway 251 South
 Davis Junction IL 61020
 815-874-9000
 000272
 NORTHERN ILLINOIS SERVICE CO.
 4781 SANDY HOLLOW ROAD

WO # 0 Route # 0 Seq # 0.00 Cell #

INVOICE INBOUND
 In Time 2/8/12 2:22 pm
 Out Time 2/8/12 2:22 pm

GROSS WEIGHT 68,200.00
 TARE WEIGHT 37,020.00
 NET WEIGHT 31,180.00

Ticket # 929241 Origin: WINNEBAGO CTY/IL
 Vehicle: NORT25
 Contract: NORTHERN IL SVC 2011
 Reference:
 Note:

Yard Cleanup

Scale Operator 41310

Qty	UOM	Material	Rate	Mat Total	Tax	Total
15.59	TN	EXT-C&D-EXTERNAL				

Total

Paid

Change Due

Inv Total

Driver Signature _____

Customers Copy