



# ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276 • (217) 782-2829  
JAMES R. THOMPSON CENTER, 100 WEST RANDOLPH, SUITE 11-300, CHICAGO, IL 60601 • (312) 814-6026

PAT QUINN, GOVERNOR

LISA BONNETT, DIRECTOR

(217) 782-9817  
TDD: (217) 782-9143

August 15, 2014

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

*AC15-8*

RECEIVED  
CLERK'S OFFICE

AUG 20 2014

STATE OF ILLINOIS  
Pollution Control Board



ORIGINAL

Re: Illinois Environmental Protection Agency v Karen Youmans  
IEPA File No. 274-14-AC; 0458035007

Dear Mr. Therriault:

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

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

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

Sincerely,

*Michelle M. Ryan*  
Michelle M. Ryan  
Assistant Counsel  
*by JR*

Enclosures

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD  
ADMINISTRATIVE CITATION

RECEIVED  
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AUG 20 2014

STATE OF ILLINOIS  
Pollution Control Board

ILLINOIS ENVIRONMENTAL  
PROTECTION AGENCY,

Complainant,

v.

KAREN YOUMANS,

Respondent.

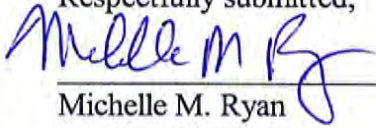
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AC 15-8  
(IEPA No. 274-14-AC)

**NOTICE OF FILING**

To: Karen Youmans  
17580E Terre Haute Road  
Paris, IL 67994

PLEASE TAKE NOTICE that on this date I mailed for filing with the Clerk of the Pollution Control Board of the State of Illinois the following instrument(s) entitled ADMINISTRATIVE CITATION, AFFIDAVIT, and OPEN DUMP INSPECTION CHECKLIST.

Respectfully submitted,  
  
\_\_\_\_\_  
Michelle M. Ryan  
Assistant Counsel  
by JLR

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

Dated: August 15, 2014

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD  
ADMINISTRATIVE CITATION

RECEIVED  
CLERK'S OFFICE  
AUG 20 2014

STATE OF ILLINOIS  
Pollution Control Board

ILLINOIS ENVIRONMENTAL PROTECTION )  
AGENCY, )  
Complainant, )  
v. )  
KAREN YOUMANS, )  
Respondent. )

AC 15-8  
(IEPA No. 274-14-AC)

JURISDICTION

This Administrative Citation is issued pursuant to the authority vested in the Illinois Environmental Protection Agency by Section 31.1 of the Illinois Environmental Protection Act, 415 ILCS 5/31.1 (2014).

FACTS

1. That Karen Youmans is the current owner ("Respondent") of a facility located at 17580 E. Terre Haute Road, Paris, Edgar County, Illinois. The property is commonly known to the Illinois Environmental Protection Agency as Paris/Youmans.
2. That said facility is designated with Site Code No. 0458035007.
3. That Respondent has owned said facility at all times pertinent hereto.
4. That on July 11, 2014, Dustin Burger of the Illinois Environmental Protection Agency's ("Illinois EPA") Champaign Regional Office inspected the above-described facility. A copy of his inspection report setting forth the results of said inspection is attached hereto and made a part hereof.
5. That on 8-15-14, Illinois EPA sent this Administrative Citation via Certified Mail No. 7012 0470 0001 3000 9408.

## VIOLATIONS

Based upon direct observations made by Dustin Burger during the course of his July 11, 2014 inspection of the above-named facility, the Illinois Environmental Protection Agency has determined that Respondent has violated the Illinois Environmental Protection Act (hereinafter, the "Act") as follows:

- (1) That Respondent caused or allowed the open dumping of waste in a manner resulting in litter, a violation of Section 21(p)(1) of the Act, 415 ILCS 5/21(p)(1) (2014).

## CIVIL PENALTY

Pursuant to Section 42(b)(4-5) of the Act, 415 ILCS 5/42(b)(4-5) (2014), Respondent is subject to a civil penalty of One Thousand Five Hundred Dollars (\$1,500.00) for each of the violations identified above, for a total of One Thousand Five Hundred Dollars (\$1,500.00). If Respondent elects not to petition the Illinois Pollution Control Board, the statutory civil penalty specified above shall be due and payable no later than September 24, 2014, unless otherwise provided by order of the Illinois Pollution Control Board.

If Respondent elects to contest this Administrative Citation by petitioning the Illinois Pollution Control Board in accordance with Section 31.1 of the Act, 415 ILCS 5/31.1 (2014), and if the Illinois Pollution Control Board issues a finding of violation as alleged herein, after an adjudicatory hearing, Respondent shall be assessed the associated hearing costs incurred by the Illinois Environmental Protection Agency and the Illinois Pollution Control Board. Those hearing costs shall be assessed in addition to the One Thousand Five Hundred Dollar (\$1,500.00) statutory civil penalty for each violation.

Pursuant to Section 31.1(d)(1) of the Act, 415 ILCS 5/31.1(d)(1) (2014), if Respondent fails to petition or elects not to petition the Illinois Pollution Control Board for review of this Administrative

Citation within thirty-five (35) days of the date of service, the Illinois Pollution Control Board shall adopt a final order, which shall include this Administrative Citation and findings of violation as alleged herein, and shall impose the statutory civil penalty specified above.

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

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

PROCEDURE FOR CONTESTING THIS  
ADMINISTRATIVE CITATION

Respondent has the right to contest this Administrative Citation pursuant to and in accordance with Section 31.1 of the Act, 415 ILCS 5/31/1 (2014). If Respondent elects to contest this Administrative Citation, then Respondent shall file a signed Petition for Review, including a Notice of Filing, Certificate of Service, and Notice of Appearance, with the Clerk of the Illinois Pollution Control Board, State of Illinois Center, 100 West Randolph, Suite 11-500, Chicago, Illinois 60601. A copy of said Petition for Review shall be filed with the Illinois Environmental Protection Agency's Division of Legal Counsel at 1021 North Grand Avenue East, P.O. Box 19276, Springfield, Illinois 62794-9276. Section 31.1 of the Act provides that any Petition for Review shall be filed within thirty-five (35) days of the date of service of this Administrative Citation or the Illinois Pollution Control Board shall enter a default judgment against the Respondent.

*Lisa Bonnett* <sup>KME</sup>

Date:

8-15-14

Lisa Bonnett, Director  
Illinois Environmental Protection Agency

Prepared by: Susan E. Konzelmann, Legal Assistant  
Division of Legal Counsel  
Illinois Environmental Protection Agency  
1021 North Grand Avenue East  
P.O. Box 19276  
Springfield, Illinois 62794-9276  
(217) 782-5544

REMITTANCE FORM

RECEIVED  
CLERK'S OFFICE  
AUG 20 2014

STATE OF ILLINOIS  
Pollution Control Board

ILLINOIS ENVIRONMENTAL PROTECTION )  
AGENCY, )  
Complainant, )  
v. )  
KAREN YOUMANS, )  
Respondent. )

AC 15-8  
(IEPA No. 274-14-AC)

FACILITY: Paris/Youmans  
SITE CODE NO.: 0458035007  
COUNTY: Edgar  
CIVIL PENALTY: \$1,500.00  
DATE OF INSPECTION: July 11, 2014

DATE REMITTED:  
SS/FEIN NUMBER:  
SIGNATURE:

NOTE

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

RECEIVED  
CLERK'S OFFICE

AUG 20 2014

STATE OF ILLINOIS  
Pollution Control Board

STATE OF ILLINOIS  
COUNTY OF EDGAR

)  
) SS )

AC158

AFFIDAVIT

I, Dustin Burger, being first duly sworn upon oath, depose and state as follows:

1. Affiant is a field inspector employed by the Land Pollution Control Division of the Illinois Environmental Protection Agency and has been so employed at all times pertinent hereto.

2. On July 11, 2014, between 10:15 and 10:35 A.M, Affiant conducted an inspection of the open dump in Edgar County, Illinois, known as Paris/Youmans, Illinois Environmental Protection Agency Site No. 0458035007.

3. Affiant inspected said Paris/Youmans open dump site by an on-site inspection, which included walking and photographing the site.

4. As a result of the activities referred to in Paragraph 3 above, Affiant completed the Inspection Report form attached hereto and made a part hereof, which, to the best of Affiant's knowledge and belief, is an accurate representation of Affiant's observations and factual conclusions with respect to said Paris/Youmans open dump.

FURTHER AFFIANT SAYETH NOT.

Dustin Burger

Subscribed and Sworn to before me this 25 day of July, 2014

Rebecca L Harden  
Notary Public





## ILLINOIS ENVIRONMENTAL PROTECTION AGENCY Open Dump Inspection Checklist

County: Edgar LPC#: 0458035007 Region: 4 - Champaign  
 Location/Site Name: Paris/Youmans  
 Date: 07/11/2014 Time: From 10:15A To 10:35a Previous Inspection Date: 04/15/2014  
 Inspector(s): Dustin Burger Weather: Pt Cloudy, 70s  
 No. of Photos Taken: # 8 Est. Amt. of Waste: 50 yds<sup>3</sup> Samples Taken: Yes #      No   
 Interviewed: No one present Complaint #:       
 Latitude: N39.52442 Longitude: W-87.6277 Collection Point Description: Dump Location -  
 (Example: Lat.: 41.26493 Long.: -89.38294) Collection Method: Other Interpolation RECEIVED Googlemaps

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

 Karen Youmans  
 17580 E. Terre Haute Road  
 Paris, IL 67944

CLERK'S OFFICE  
 AUG 20 2014  
 STATE OF ILLINOIS  
 Pollution Control Board

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

LPC # 0458035007

Inspection Date: 07/11/2014

	(7)	Deposition of: (i) General Construction or Demolition Debris as defined in Section 3.160(a); or (ii) Clean Construction or Demolition Debris as defined in Section 3.160(b)	<input type="checkbox"/>
9.	55(a)	<b>NO PERSON SHALL:</b>	
	(1)	Cause or Allow Open Dumping of Any Used or Waste Tire	<input type="checkbox"/>
	(2)	Cause or Allow Open Burning of Any Used or Waste Tire	<input type="checkbox"/>
10.	55(k)	<b>NO PERSON SHALL:</b>	
	(1)	Cause or Allow Water to Accumulate in Used or Waste Tires	<input type="checkbox"/>
	(4)	Transport Used or Waste Tires in Violation of the Registration and Placarding Requirements	<input type="checkbox"/>
<b>35 ILLINOIS ADMINISTRATIVE CODE REQUIREMENTS SUBTITLE G</b>			
11.	812.101(a)	FAILURE TO SUBMIT AN APPLICATION FOR A PERMIT TO DEVELOP AND OPERATE A LANDFILL	<input type="checkbox"/>
12.	722.111	HAZARDOUS WASTE DETERMINATION	<input type="checkbox"/>
13.	808.121	SPECIAL WASTE DETERMINATION	<input type="checkbox"/>
14.	809.302(a)	ACCEPTANCE OF SPECIAL WASTE FROM A WASTE TRANSPORTER WITHOUT A WASTE HAULING PERMIT, UNIFORM WASTE PROGRAM REGISTRATION AND PERMIT AND/OR MANIFEST	<input type="checkbox"/>
15.	815.201	FAILURE TO FILE AN INITIAL FACILITY REPORT WITH THE AGENCY TO PROVIDE INFORMATION CONCERNING LOCATION AND DISPOSAL PRACTICES OF THE FACILITY.	<input type="checkbox"/>
<b>OTHER REQUIREMENTS</b>			
16.		APPARENT VIOLATION OF: <input type="checkbox"/> PCB; <input type="checkbox"/> CIRCUIT COURT CASE NUMBER: ORDER ENTERED ON:	<input type="checkbox"/>
17.	OTHER:		<input type="checkbox"/>
			<input type="checkbox"/>
			<input type="checkbox"/>
			<input type="checkbox"/>
			<input type="checkbox"/>
			<input type="checkbox"/>

Informational Notes

- [Illinois] Environmental Protection Act: 415 ILCS 5/4.
- Illinois Pollution Control Board: 35 Ill. Adm. Code, Subtitle G.
- Statutory and regulatory references herein are provided for convenience only and should not be construed as legal conclusions of the Agency or as limiting the Agency's statutory or regulatory powers. Requirements of some statutes and regulations cited are in summary format. Full text of requirements can be found in references listed in 1. and 2. above.
- The provisions of subsection (p) of Section 21 and subsection (k) of Section 55 of the [Illinois] Environmental Protection Act shall be enforceable either by administrative citation under Section 31.1 of the Act or by complaint under Section 31 of the Act.
- This inspection was conducted in accordance with Sections 4(c) and 4(d) of the [Illinois] Environmental Protection Act: 415 ILCS 5/4(c) and (d).
- Items marked with an "NE" were not evaluated at the time of this inspection.

**Illinois Environmental Protection Agency**  
Bureau of Land ♦ Field Operations Section ♦ Champaign

LPC#0458035007—Edgar County  
Paris/Youmans  
FOS File  
July 11, 2014 Inspection  
Inspector: Dustin Burger

**Narrative Inspection Report**

I conducted an open dump reinspection at the above referenced facility on July 11, 2014. The inspection lasted from approximately 10:15-10:35 A.M. This inspection was conducted to determine the regulatory status and evaluate compliance with the Environmental Protection Act (Act) and Title 35 Illinois Administrative Code, Subtitle G: Land Pollution (Regulations). Eight (8) photos and no samples were taken. The weather was partly cloudy, calm, with temperatures in the 70s. Ms. Karen Youmans, the owner of the property, was not present during the inspection.

**Initial Inspection**

Champaign FOS received a complaint from the local fire department Chief, Brian Gates, alleging the owner of the property at 17580 E. Terre Haute Road, Paris, Illinois, was bringing in waste and dumping it on her property.

The property is located South of Paris 6-7 miles on Lower Terre Haute Road, which turns east at the Youmans property and becomes East Terre Haute Road. The property consists of a dilapidated house, a garage, and yard and pasture with horses. When I arrived, I could not park in the driveway because part of the drive was filled with miscellaneous material. The yard and part of the pasture had items collected from unknown sources piled about. The material included large amounts of furniture, books, plastic, sheeting, metal storage boxes, doors and windows, empty animal food bags, carpet, lumber, and cardboard. The garage door was packed to the ceiling with material including books, furniture, and bedding.

While the majority of the materials outside were not inherently wastes, the fact they are left outside in the weather and are not treated as valuable produces would qualify the material was wastes. The books and furniture, particularly, have been ruined by exposure to precipitation.

A check with the assessor's office found the site owner was Karen Youmans, who is listed as living at the property.

### Follow-up Inspection

An ACWN was sent on May 8, 2014 with a clean-up deadline set for July 1, 2014. The letter was sent first class mail and was not returned. No response was received from Ms. Youmans.

A reinspection on July 1, 2014 found the site essentially unchanged from the previous inspection. The driveway was still filled with debris, including furniture, ruined books and magazines, baskets, windows and doors, and empty feed bags. There were several suitcases, a trunk, boxes, and several pallets in the yard. Several pieces of furniture were found exposed to the elements in the horse enclosure south of the house (photo 5). The whole yard was overgrown, and I had to pick my way around poison ivy to the house.

Despite the derelict condition of the house (photo 8), the Assessor's office still lists Ms. Youmans as living at the address. I do not know about the accuracy of the assessor's records, but someone had been at the site recently as evidenced by a plastic dish with still fairly fresh cut tomatoes found on the ground near the entrance (photo 3).

### Apparent violations observed during this inspections:

Environmental Protection Act. 415 ILCS 5/1 et. seq. (formerly Ill. Rev. Stat. Ch. 111 1/2, 1001 et. seq.) {hereinafter called the "Act"}

- #1 Pursuant to Section 21(a) of the Act, no person shall cause or allow the open dumping of any waste.

A violation of Section 21(a) is alleged for the following reason: **evidence of open dumping of waste was observed during the inspection.**

- #2 Pursuant to Section 21(d)(1) of the Act, in relevant part, no person shall conduct any waste-storage, waste-treatment, or waste-disposal operation without a permit granted by the Agency or in violation of any conditions imposed by such permit, including periodic reports and full access to adequate records and the inspection of facilities, as may be necessary to assure compliance with this Act and with regulations and standards adopted there under.

A violation of Section 21(d)(1) of the [Illinois] Environmental Protection Act (415 ILCS 5/21(d)(1)) is alleged for the following reason: **A waste storage and waste disposal operation is being conducted without a permit.**

- #3 Pursuant to Section 21(d)(2) of the Act, no person shall conduct any waste-storage, waste-treatment, or waste-disposal operation in violation of any regulations or standards adopted by the Board under this Act.

A violation of Section 21(d)(2) of the [Illinois] Environmental Protection Act (415 ILCS 5/21(d)(2)) is alleged for the following reason: **A waste storage and waste disposal operation is being conducted in violation of the Act and Regulations**

- #4 Pursuant to Section 21(e) of the Act, no person shall dispose, treat, store or abandon any waste or transport any waste into this State for disposal, treatment, storage, or abandonment, except at a site or facility which meets the requirements of this Act and of regulations and standards thereunder.

A violation of Section 21(e) is alleged for the following reason: **waste was stored and disposed of at this site which does not meet the requirements of the Act and of regulations and standards thereunder.**

- #5 Pursuant to Section 21(p)(1) of the Act, no one shall cause or allow the open dumping of any waste in a manner which results in litter.

A violation of Section 21(p)(1) is alleged for the following reason: **waste was open dumped at this site resulting in litter.**

35 Illinois Administrative Code. (Title 35: Environmental Protection, Subtitle G: Land Pollution, Chapter I: Pollution Control Board) [Regulations]

- #6 Pursuant to Section 812.101(a) of the Regulations, All persons, except those specifically exempted by Section 21(d) of the Act, shall submit to the Agency an application for a permit to develop and operate a landfill.

A violation of Section 812.101(a) is alleged for the following reason: **this waste management site has not submitted an application to the Agency for a permit to develop and operate a landfill.**



Illinois Environmental Protection Agency  
Bureau of Land

## ***DIGITAL PHOTOGRAPHS***

LPC #0458035007—Edgar County  
Paris/Youmans  
FOS File

DATE July 11, 2014  
TIME 10:15-10:35 A.M  
DIRECTION: West  
PHOTO by: Dustin Burger  
PHOTO FILENAME  
0458035007~07112014-001.jpg  
COMMENTS:



DATE July 11, 2014  
TIME 10:15-10:35 A.M  
DIRECTION: Northwest  
PHOTO by: Dustin Burger  
PHOTO FILENAME  
0458035007~07112014-002.jpg  
COMMENTS:





Illinois Environmental Protection Agency  
Bureau of Land

## ***DIGITAL PHOTOGRAPHS***

LPC #0458035007—Edgar County  
Paris/Youmans  
FOS File

DATE July 11, 2014  
TIME 10:15-10:35 A.M.  
DIRECTION: Down (West)  
PHOTO by: Dustin Burger  
PHOTO FILENAME  
0458035007~07112014-003.jpg  
COMMENTS:



DATE July 11, 2014  
TIME 10:15-10:35 A.M.  
DIRECTION: Southwest  
PHOTO by: Dustin Burger  
PHOTO FILENAME  
0458035007~07112014-004.jpg  
COMMENTS:





Illinois Environmental Protection Agency  
Bureau of Land

## ***DIGITAL PHOTOGRAPHS***

LPC #0458035007—Edgar County  
Paris/Youmans  
FOS File

DATE July 11, 2014  
TIME 10:15-10:35 A.M  
DIRECTION: Southwest  
PHOTO by: Dustin Burger  
PHOTO FILENAME  
0458035007~07112014-005.jpg  
COMMENTS:



DATE July 11, 2014  
TIME 10:15-10:35 A.M  
DIRECTION: Northeast  
PHOTO by: Dustin Burger  
PHOTO FILENAME  
0458035007~07112014-006.jpg  
COMMENTS:







Illinois Environmental Protection Agency  
Bureau of Land

## ***DIGITAL PHOTOGRAPHS***

LPC #0458035007—Edgar County  
Paris/Youmans  
FOS File

DATE: July 11, 2014  
TIME: 10:15-10:35 A.M  
DIRECTION: North  
PHOTO by: Dustin Burger  
PHOTO FILENAME  
0458035007~07112014-007.jpg  
COMMENTS:



DATE: July 11, 2014  
TIME: 10:15-10:35 A.M  
DIRECTION: NNW  
PHOTO by: Dustin Burger  
PHOTO FILENAME  
0458035007~07112014-008.jpg  
COMMENTS:



**PROOF OF SERVICE**

I hereby certify that I did on the 15th day of August 2014, send by Certified Mail, Return Receipt Requested, with postage thereon fully prepaid, by depositing in a United States Post Office Box a true and correct copy of the following instrument(s) entitled ADMINISTRATIVE CITATION, AFFIDAVIT, and OPEN DUMP INSPECTION CHECKLIST

To: Karen Youmans  
17580E Terre Haute Road  
Paris, IL 67994

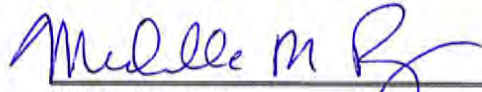
**RECEIVED**  
CLERK'S OFFICE

AUG 20 2014

STATE OF ILLINOIS  
Pollution Control Board

and the original and nine (9) true and correct copies of the same foregoing instruments on the same date by Certified Mail, Return Receipt Requested, with postage thereon fully prepaid

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

  
\_\_\_\_\_  
Michelle M. Ryan  
Assistant Counsel  
*by JR*

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