

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

HAMILTON & GROVE)
 PROPERTIES, INC.)
)
 Petitioner,)
)
 v.)
 ILLINOIS ENVIRONMENTAL)
 PROTECTION AGENCY,)
)
 Respondent.)

PCB 15-71
 (Permit Appeal – Land, SRP)

NOTICE

John T. Therriault
 Clerk of the Board
 Illinois Pollution Control Board
 100 West Randolph Street, Suite 11-500
 Chicago, Illinois 60601-3218

James B. Williams
 Law Offices of James B. Williams
 7705 S. Cottage Grove Avenue
 Chicago, Illinois 60619

Bradley P. Halloran
 Hearing Officer
 Illinois Pollution Control Board
 100 West Randolph Street, Suite 11-500
 Chicago, Illinois 60601-3218

PLEASE TAKE NOTICE that I have today caused to be filed a MOTION FOR LEAVE TO SUPPLEMENT ADMINISTRATIVE RECORD with the Illinois Pollution Control Board, a copy of which is served upon you.


Respectfully submitted,

ILLINOIS ENVIRONMENTAL
 PROTECTION AGENCY,

Dated: February 5, 2015

Scott B. Sievers
 Attorney Registration No. 6275924
 1021 North Grand Avenue East
 P.O. Box 19276
 Springfield, Illinois 62794-9276
 (217) 782-5544

Respondent,

BY: 

 Scott B. Sievers
 Special Assistant Attorney General

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

HAMILTON & GROVE)	
PROPERTIES, INC.)	
)	
Petitioner,)	
)	
v.)	PCB 15-71
)	(Permit Appeal – Land, SRP)
ILLINOIS ENVIRONMENTAL)	
PROTECTION AGENCY,)	
)	
Respondent.)	

MOTION FOR LEAVE TO SUPPLEMENT ADMINISTRATIVE RECORD

NOW COMES the Respondent, ILLINOIS ENVIRONMENTAL PROTECTION AGENCY (“Illinois EPA”), by and through its counsel, Special Assistant Attorney General Scott B. Sievers, and moves this honorable Board for leave to supplement the administrative record. In support, the Respondent states the following:

1. On January 27, 2015, the Respondent filed the administrative record in this action.
2. After said filing, the Respondent identified additional documents that warranted inclusion in the administrative record pursuant to 35 Ill. Adm. Code 105.212.
3. Consequently, the Respondent seeks leave to supplement the administrative record with those additional documents, copies of which are enclosed.
4. The undersigned has conferred with counsel for the Petitioner, and the Petitioner has no objection to this motion.

WHEREFORE, the Respondent, ILLINOIS ENVIRONMENTAL PROTECTION AGENCY, prays that this honorable Board ALLOW this Motion for Leave to Supplement Administrative Record to include the enclosed documents.

Respectfully submitted,

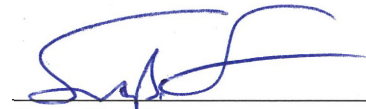
ILLINOIS ENVIRONMENTAL
PROTECTION AGENCY,

Dated: February 5, 2015

Scott B. Sievers
Attorney Registration No. 6275924
1021 North Grand Avenue East
P.O. Box 19276
Springfield, Illinois 62794-9276
(217) 782-5544

Respondent,

BY:



Scott B. Sievers
Special Assistant Attorney General

Hamilton & Grove Properties, Inc. v. Illinois Environmental Protection Agency
Pollution Control Board No. 15-71

CERTIFICATE OF SERVICE

Scott B. Sievers, Special Assistant Attorney General, herein certifies that he has served a copy of the foregoing **MOTION FOR LEAVE TO SUPPLEMENT ADMINISTRATIVE RECORD** upon:

John T. Therriault
Clerk of the Board
Illinois Pollution Control Board
100 West Randolph Street, Suite 11-500
Chicago, Illinois 60601-3218

James B. Williams
Law Offices of James B. Williams
7705 S. Cottage Grove Avenue
Chicago, Illinois 60619
james.b.williams@sbcglobal.net

Bradley P. Halloran
Hearing Officer
Illinois Pollution Control Board
James R. Thompson Center, Suite 11-500
100 W. Randolph Street
Chicago, Illinois 60601
Brad.Halloran@illinois.gov

by e-mail where indicated and by mailing true copies thereof to the addresses referred to above in envelopes duly addressed bearing proper first class postage and deposited in the United States mail at Springfield, Illinois, on February 5, 2015.

Respectfully submitted,

ILLINOIS ENVIRONMENTAL
PROTECTION AGENCY,

Dated: February 5, 2015

Scott B. Sievers
Attorney Registration No. 6275924
1021 North Grand Avenue East
P.O. Box 19276
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Respondent,

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Scott B. Sievers
Special Assistant Attorney General

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Respectfully submitted,


ILLINOIS ENVIRONMENTAL
PROTECTION AGENCY,

Respondent,

Dated: February 5, 2015

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Special Assistant Attorney General