BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

)	PCB 2015-060
)	PCB 2015-076
)	PCB 2015-111
)	PCB 2015-113
)	PCB 2015-166
)	PCB 2015-194
)	PCB 2015-195 (cons.)
)	
)	(Permit Appeals)
)	
))))))

NOTICE OF ELECTRONIC FILING

TO: All Parties of Record

PLEASE TAKE NOTICE that on June 29, 2015, I filed the following documents electronically with the Clerk of the Pollution Control Board of the State of Illinois:

- 1. Joint Motion to Extend Stay; and
- 2. This Notice of Electronic Filing

Copies of the above-listed documents were served upon you in the manner stated in the Certificate of Service attached hereto.

Respectfully submitted,

CLINTON LANDFILL, INC., Petitioner

By: One of its attorneys

Brian J. Meginnes, Esq. (<u>bmeginnes@emrslaw.com</u>) Janaki Nair, Esq. (<u>jnair@emrslaw.com</u>) Elias, Meginnes & Seghetti, P.C. 416 Main Street, Suite 1400 Peoria, IL 61602 Telephone: (309) 637-6000 Facsimile: (309) 637-8514

915-0587

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

CLINTON LANDFILL, INC.,)	PCB 2015-060
)	PCB 2015-076
Petitioner,)	PCB 2015-111
)	PCB 2015-113
V.)	PCB 2015-166
)	PCB 2015-194
ILLINOIS ENVIRONMENTAL)	PCB 2015-195 (cons.)
PROTECTION AGENCY,)	
	Ĵ	(Permit Appeals)
Respondent.)	

JOINT MOTION TO EXTEND STAY

NOW COMES the Petitioner, CLINTON LANDFILL, INC. ("CLI"), and the Respondent, the ILLINOIS ENVIRONMENTAL PROTECTION AGENCY (the "Agency"), by and through their undersigned attorneys, and as and for their Joint Motion to Extend the Stay in these consolidated cases, PCB 2015-060, PCB 2015-076, PCB 2015-111, PCB 2015-113, PCB 2015-166, PCB 2015-194, and PCB 2015-195 (cons.) (the "Consolidated Case"), state as follows:

 The Consolidated Case concerns the unilateral modification of Permit No. 2005-070-LF by the Agency on July 31, 2014.

2. CLI and the Agency previously moved for a stay of the Consolidated Case until April 30, 2015, which was granted by the Board, and then moved for an extension of the stay until June 30, 2015, which was also granted by the Board.

3. Settlement negotiations between CLI and the Agency are continuing. If these negotiations are successfully concluded, CLI will most likely dismiss the Consolidated Case.

4. CLI and the Agency jointly submit that it is in the interest of efficiency and would aid the parties in resolving these matters for the Board to extend the stay on the proceedings in

the Consolidated Case until **July 31, 2015**, at which time, unless the stay is extended by request of the parties, the stay will be lifted.

5. By July 31, 2015, the parties reasonably anticipate that settlement negotiations will most likely have concluded, either successfully or not.

6. CLI will file a deadline waiver to November 19, 2015, which is at least 120 days after July 31, 2015.

7. If the stay is imposed, the parties ask that the Board nevertheless retains on the docket, the telephonic status conference that is presently set for July 21, 2015, at 10:30 a.m., so that the parties can update the Hearing Officer regarding settlement status in advance of July 31, 2015.

CLI and the Agency each reserve the right to seek to lift the stay prior to July 31,
 2015.

WHEREFORE, CLI and the Agency jointly request that the Board or the Hearing Officer enter an Order staying the case until **July 31, 2015**, in accordance with the above.

[signature page follows]

Respectfully submitted,

Brian J. Meginnes, Esq. Janaki Nair, Esq. Elias, Meginnes & Seghetti, P.C. 416 Main Street, Suite 1400 Peoria, IL 61602 Telephone: (309) 637-6000 Facsimile: (309) 637-8514 Emails: <u>bmeginnes@emrslaw.com</u> jnair@emrslaw.com CLINTON LANDFILL, INC., Petitioner

By: One of its attorneys

Jennifer A. Van Wie, Assistant Atty. General Stephen Sylvester, Assistant Atty. General Illinois Attorney General's Office Environmental Bureau 69 W. Washington St., Suite 1800 Chicago, Illinois 60602 Emails: jvanwie@atg.state.il.us ssylvester@atg.state.il.us

915-0586

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY, Respondent

By: _

One of its attorneys

Respectfully submitted,

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Jennifer A. Van Wie, Assistant Atty. General Stephen Sylvester, Assistant Atty. General Illinois Attorney General's Office Environmental Bureau 69 W. Washington St., Suite 1800 Chicago, Illinois 60602 Emails: jvanwie@atg.state.il.us ssylvester@atg.state.il.us CLINTON LANDFILL, INC., Petitioner

By: _

One of its attorneys

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY, Respondent

One of its attorneys By:

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Filed Electronically - Printed on Recycled Paper per 35 Ill, Adm. Code §§101.202 and 101.302(g) as Applicable.

CERTIFICATE OF SERVICE

The undersigned certifies that on June 29, 2015, the foregoing document will be served upon each party to this case in the following manner:

X VIA EMAIL with confirmation by United States Mail ONLY

Jennifer A. Van Wie, Esq., Assistant Attorney General Stephen Sylvester, Esq., Assistant Attorney General Environmental Bureau 69 W. Washington St., Suite 1800 Chicago, Illinois 60602 Emails: jvanwie@atg.state.il.us ssylvester@atg.state.il.us

Matthew J. Dunn Division Chief, Environmental Enforcement and Asbestos Litigation Division Illinois Attorney General's Office 500 South Second Street Springfield, Illinois 62706 Email: mdunn@atg.state.il.us

Hearing Officer Carol Webb VIA EMAIL ONLY: <u>Carol.Webb@illinois.gov</u>

By: Attorney

Brian J. Meginnes, Esq. (<u>bmeginnes@emrslaw.com</u>) Janaki Nair, Esq. (<u>jnair@emrslaw.com</u>) Elias, Meginnes & Seghetti, P.C. 416 Main Street, Suite 1400 Peoria, IL 61602 Telephone: (309) 637-6000 Facsimile: (309) 637-8514