

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
PROTECTION AGENCY,)	PCB 2015-207
)	PCB 2016-034 (cons.)
Respondent.)	(Permit Appeals)

NOTICE OF ELECTRONIC FILING

TO: All Parties of Record


PLEASE TAKE NOTICE that on October 26, 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. (bmeginnes@emrslaw.com)
Janaki Nair, Esq. (jnair@emrslaw.com)
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915-1010

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

CLINTON LANDFILL, INC.,)	PCB 2015-060
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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, PCB 2015-195, PCB 2015-207, and PCB 2016-034 (cons.) (the “Consolidated Case”), state as follows:

1. 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. The stay has been extended several times on the joint motion of CLI and the Agency, most recently until October 31, 2015.
3. Settlement negotiations amongst CLI, the Agency, and various other State and local governmental entities, which affect this case, have been on-going for many months. The local governmental entities have now approved the proposed settlement. CLI and the Agency believe that the settlement will be finalized by the end of December, 2015.

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

5. As above, by December 31, 2015, the parties reasonably anticipate that settlement will most likely have been finalized.

6. CLI is filing a deadline waiver to May 31, 2016, which is more than 120 days after December 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 December 9, 2015, at 10:00 a.m., so that the parties can update the Hearing Officer regarding settlement status in advance of December 31, 2015.

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

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

[signature page follows]

Respectfully submitted,

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CLINTON LANDFILL, INC.,
Petitioner

By: 
One of its attorneys

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ILLINOIS ENVIRONMENTAL PROTECTION
AGENCY,
Respondent

By: 
One of its attorneys

CERTIFICATE OF SERVICE

The undersigned certifies that on October 26, 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
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Hearing Officer Carol Webb
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By: 

Attorney

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NOTICE OF ELECTRONIC FILING

TO: All Parties of Record

PLEASE TAKE NOTICE that on October 26, 2015, I filed the following documents electronically with the Clerk of the Pollution Control Board of the State of Illinois:

1. Waiver of the Decision Deadline to May 31, 2016; 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

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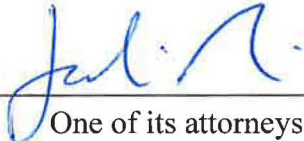
WAIVER OF DECISION DEADLINE TO MAY 31, 2016

NOW COMES the Petitioner, Clinton Landfill, Inc. ("CLI"), by and through its undersigned attorneys, and as and for its Waiver of the Decision Deadline to May 31, 2016, states as follows:

CLI hereby agrees to waive the decision deadline in this case (*i.e.*, the nine above-listed cases that have been consolidated) until **May 31, 2016**.

Respectfully submitted,

CLINTON LANDFILL, INC.,
Petitioner

By: 
One of its attorneys

Brian J. Meginnes, Esq. (bmeginnes@emrslaw.com)
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By: _____


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