#### BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

NACME STEEL PROCESSING LLC,	)	
Petitioner,	)	
vs.	) PCB 15-153 ) (Permit App	
ILLINOIS ENVIRONMENTAL PROTECTION AGENCY,	) ) )	
Respondent.	) ) )	

### **NOTICE OF ELECTRONIC FILING**

PLEASE TAKE NOTICE that on November 17, 2015, the undersigned filed Respondent's Motion for Additional Time to File Response, by electronic filing. A copy of the document so filed is attached hereto, and served upon you.

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

LISA MADIGAN, Attorney General of the State of Illinois

BY:

CHRISTOPHER GRANT
Assistant Attorney General
Environmental Bureau
69 W. Washington Street, #1800
Chicago, Illinois 60602

(312) 814-5388

#### BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

NACME STEEL PROCESSING LLC,	)	
Petitioner,	)	
i cuttoner,	)	
vs.	)	PCB 15-153
	)	(Permit Appeal-CAAPP)
	)	
ILLINOIS ENVIRONMENTAL	)	
PROTECTION AGENCY,	)	
Respondent.	)	
	)	

#### RESPONDENT'S MOTION FOR ADDITIONAL TIME TO FILE RESPONSE

Now comes Respondent, the ILLINOIS ENVIRONMENTAL PROTECTION AGENCY, through its attorney LISA MADIGAN, Attorney General of the State, and requests that the Hearing Officer grant it an additional extension, until December 1, 2015, to file its Response to Petitioner's Motion for Summary Judgment. In support thereof, Respondent states as follows:

- 1. Petitioner filed its Motion for Summary Judgment in this matter on October 21, 2015. On November 5, 2015, the Hearing Officer granted Respondent's Motion to extend the date for filing its Response to Petitioner's Motion to November 20, 2015.
- 2. Assistant Attorney General Nancy Tikalsky is the lead attorney for Respondent in this matter. On November 14, 2015, a close family member of Ms. Tikalsky passed away unexpectedly. As of the date of filing this Motion, Ms. Tikalsky is out-of-state to attend the funeral, and to assist in family business related to the death of the family member. Ms. Tikalsky, who has drafted all documents filed in this matter by the Respondent, is not expected back in time to complete the Response by the current filing deadline.
- 3. On November 16, 2015, the undersigned contacted Mr. Edward Walsh, counsel for Petitioner, to request an extension of the Response deadline until December 1, 2015. Mr.

Walsh has graciously agreed to the extension.

4. This matter is set for status on November 24, 2015, at which time the Parties and the Hearing Officer may discuss any issues arising due to the granting of the requested extension.

WHEREFORE, Respondent, THE ILLINOIS ENVIRONMENTAL PROTECTION
AGENCY, respectfully requests that the Hearing Officer grant additional time, until December
1, 2015, for the filing of Respondent's Response to Petitioner's Motion for Summary Judgment.

RESPECTFULLY SUBMITTED,

BY:

CHRISTOPHER GRANT Assistant Attorney General Environmental Bureau

69 W. Washington St., #1800 Chicago, Illinois 60602

(312) 814-5388

#### BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

NACME STEEL PROCESSING LLC,	)	
Petitioner,	)	
VS.	)	PCB 15-153 (Permit Appeal-Air)
ILLINOIS ENVIRONMENTAL	)	(1 cmm 1 1 pp cm 1 m)
PROTECTION AGENCY,  Respondent.	)	
respondent.	)	

#### **CERTIFICATE OF SERVICE**

I, CHRISTOPHER GRANT, an attorney, do certify that I caused to be served this 17th day of November, 2015, the foregoing Motion for Extension of Time to File Response, and Notice of Electronic Filing, upon the persons listed below, by electronic mail, and by placing same in an envelope bearing sufficient postage with the United States Postal Service located at 100 W. Randolph, Chicago Illinois.

CHRISTOPHER GRANT

Service List:

Mr. Edward V. Walsh III ReedSmith LLP 10 S. Wacker Drive, Suite 4000 Chicago, Illinois 60606 (by electronic mail and first class mail)

Mr. Bradley P. Halloran Hearing Officer Illinois Pollution Control Board 100 W. Randolph, 11<sup>th</sup> Floor Chicago, Il 60601 (by electronic mail)

Mr. John Therriault Clerk, Illinois Pollution Control Board (by electronic filing)