Electronic Filing - Received, Clerk's Office: 07/20/2016

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

ILLINOIS ENVIRONMENTAL)	
PROTECTION AGENCY,)	
)	
Complainant,)	AC 2015-033
)	
v.)	(IEPA No. 75-15-AC)
)	
GERALD CAIN and EDDIE JONES,)	
_)	
Respondents.)	

NOTICE OF FILING

To: Eddie Jones 2970 Morgan School Road Jonesboro, IL 62952 Cameron Law Firm, LLC Elvis C. Cameron 205 B North Main Street P. O. Box 196 Anna, IL 62906

PLEASE TAKE NOTICE that on this date I electronically filed with the Clerk of the Pollution Control Board of the State of Illinois the following instrument(s) entitled MOTION TO WITHDRAW ADMINISTRATIVE CITATION.

Respectfully Submitted,

e-signature valid for IPCB e-filings ONL

Michelle M. Ryan Assistant Counsel

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

Dated: July 20, 2016

Electronic Filing - Received, Clerk's Office: 07/20/2016

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

ILLINOIS ENVIRONMENTAL)	
PROTECTION AGENCY,)	
)	
Complainant,)	AC 2015-033
)	
v.)	(IEPA No. 75-15-AC)
)	
GERALD CAIN and EDDIE JONES,)	
)	
Respondents.)	

COMPLAINANT'S MOTION TO WITHDRAW ADMINISTRATIVE CITATION

NOW COMES the Complainant, ILLINOIS ENVIRONMENTAL PROTECTION

AGENCY ("Illinois EPA"), by and through its attorney, Michelle M. Ryan, pursuant to Section

101.500 of the Illinois Pollution Control Board's ("Board") Rules and Regulations, 35 Ill. Adm.

Code 101.500, , and respectfully states as follows:

- 1. In March 2015, the Illinois EPA served the Respondents with Administrative Citation No. 75-15-AC.
- 2. On or about April 13 and May 4, 2015, Respondents Cain and Jones, respectively, filed Petitions for Review contesting the administrative citation.
- 3. Based upon facts and circumstances discovered since the filing of the Administrative Citation, Illinois EPA has determined that it is prudent to withdraw this Administrative Citation at this time.

Electronic Filing - Received, Clerk's Office : 07/20/2016

WHEREFORE, the Illinois Environmental Protection Agency requests that the Board dismiss the pending action against all Respondents.

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY, Complainant

DATED: July 20, 2016

e-signature valid for IPCB e-filings ONLY

Michelle M. Ryan Assistant Counsel

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

Electronic Filing - Received, Clerk's Office: 07/20/2016

PROOF OF SERVICE

I hereby certify that I did on the 20th day of July, 2016, send by U.S. Mail 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 MOTION TO WITHDRAW

ADMINISTRATIVE CITATION

To: Eddie Jones

2970 Morgan School Road Jonesboro, IL 62952 Cameron Law Firm, LLC

Elvis C. Cameron 205 B North Main Street

P. O. Box 196 Anna, IL 62906

and an electronic copy of the same foregoing instrument on the same date via electronic filing

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

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