

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

PEOPLE OF THE STATE OF ILLINOIS,)	
LISA MADIGAN, Attorney General of)	
the State of Illinois,)	
)	
Complainant,)	
)	
vs)	PCB No. 05-51
)	(Enforcement-Air)
ENVIRONMENTAL HEALTH AND SAFETY)	
SERVICES, INC., an Illinois corporation)	
)	
Respondent.)	

RESPONSE TO REQUEST FOR ADMISSION OF FACTS

NOW COMES the Respondent, ENVIRONMENTAL HEALTH AND SAFETY SERVICES, INC., an Illinois corporation, by its attorneys, SCHLUETER ECKLUND and for its response to Complainant's Request for Admission of Facts states as follows:

1. Respondent admits Fact No. 1.
2. Respondent admits Fact No. 2.
3. Respondent admits Fact No. 3.
4. Respondent denies Fact No. 4.
5. Respondent denies Fact No. 5.
6. Respondent denies Fact No. 6.
7. Respondent denies Fact No. 7.
8. Respondent admits Fact No. 8.
9. Respondent admits a notification was sent but currently is unsure of the date

and therefore denies the remaining facts stated.

10. Respondent states that the notification speaks for itself.
11. Respondent states that the notification speaks for itself.
12. Respondent states that the notification speaks for itself.
13. Respondent states that the notification speaks for itself.
14. Respondent states that the notification speaks for itself.
15. Respondent denies Fact No. 15.
16. Respondent denies Fact No. 16.
17. Respondent admits Fact No. 17.
18. Respondent states that the notification speaks for itself.
19. Respondent states that the notification speaks for itself.
20. Respondent states that the notification speaks for itself.
21. Respondent states that the notification speaks for itself.
22. Respondent has insufficient knowledge to form an opinion, therefore denies
the same.
23. Respondent denies Fact No. 23.
24. Respondent denies Fact No. 24.
25. Respondent denies Fact No. 25.
26. Respondent denies Fact No. 26.
27. Respondent denies Fact No. 27.
28. Respondent denies Fact No. 28.
29. Respondent denies Fact No. 29.

30. Respondent denies Fact No. 30.

31. Respondent denies Fact No. 31.

32. Respondent denies Fact No. 32.

33. Respondent denies as the temperatures were below freezing.

34. Respondent has insufficient information to form a belief as to the statement made in Fact No. 34 and therefore denies the same.

35. Respondent has insufficient information to form a belief as to the statement made in Fact No. 35 and therefore denies the same.

36. Respondent denies Fact No. 36.

37. Respondent denies Fact No. 37.

38. Respondent has insufficient information therefore denies the same.

39. Respondent denies Fact No. 39.

40. Respondent has insufficient information to form a belief as to the statement made in Fact No. 40 and therefore denies the same.

41. Respondent has insufficient information to form a belief as to the statement made in Fact No. 41 and therefore denies the same.

42. Respondent denies Fact No. 42.

43. Respondent denies Fact No. 43.

44. Respondent denies Fact No. 44.

45. Respondent denies Fact No. 45.

46. Respondent denies Fact No. 46.

47. Respondent denies Fact No. 47.

48. Respondent denies Fact No. 48.

Respectfully submitted,
ENVIRONMENTAL HEALTH AND SAFETY
SERVICES, INC., an Illinois corporation, Respondent

By: SCHLUETER ECKLUND

BRYAN G. SELANDER, One of its attorneys

DATE: January 17, 2006

Bryan G. Selander #316
SCHLUETER ECKLUND
4023 Charles Street
Rockford, IL 61108
(815) 229-5333

CERTIFICATE OF SERVICE

I, BRYAN G. SELANDER, Attorney for Respondent, do certify that I caused to be mailed this 17th day of January, 2006, the foregoing RESPONSES TO ADMISSION OF FACTS to the persons listed on the said NOTICE by first-class mail in a postage prepaid envelope and depositing same with the United States Postal Service located at 5225 Harrison Avenue, Rockford, IL 61125.

It is hereby certified that a true copy of the foregoing Notice was electronically filed with the following on January 17, 2006:

Dorothy M. Gunn
Illinois Pollution Control Board
James R. Thompson Center
100 West Randolph, Suite 11-500
Chicago, IL 60601

BRYAN G. SELANDER
Attorney for Respondent
Schlueter Ecklund
4023 Charles Street
Rockford, IL 61108
(815) 229-5333

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NOTICE OF FILING

TO: Katherine M. Hausrath	Bradley P. Halloran
Assistant Attorney General	Hearing Officer
Environmental Bureau	Illinois Pollution Control Board
188 W. Randolph St., 20 th Flr.	James R. Thompson Center, Suite 11-500
Chicago, IL 60601	100 W. Randolph Street
	Chicago, IL 60601

PLEASE TAKE NOTICE that I have today electronically filed with the Office of the Clerk of the Illinois Pollution Control Board a copy of Respondent's Response to Admission of Facts, a copy of which is attached and herewith served upon you.

Dated: January 17, 2006.

Respectfully submitted,

ENVIRONMENTAL HEALTH and SAFETY

SERVICES, INC.

BY: SCHLUETER ECKLUND

BRYAN G. SELANDER, one of its attorneys