

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

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STATE OF ILLINOIS
Pollution Control Board

ILLINOIS ENVIRONMENTAL)
PROTECTION AGENCY,)
Complainant,)

AC 06-20

Vs.)

(IEPA no. 459-05-AC)

GEORGIA SHANK AND)
STEVE SHANK)

Respondents.)

MOTION TO DISMISS

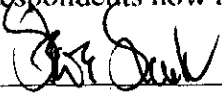
Respondents move to dismiss due to the following relevant facts-

1. Respondent(s) do not operate a facility at Route 40 and Elm Street, Greenville, IL
2. Facility is not an open dump.
3. Kendall Couch has never made a complete inspection of said property.

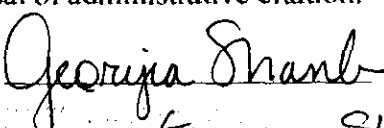
Response to False accusations of purported violations

1. Respondents have not caused or allowed the open dumping of waste.
2. Respondents did not cause or allow open burning.
3. Respondents have the right to store, on a temporary basis, certain clean construction debris.

Respondents now respectfully request dismissal of administrative citation.



STEVE SHANK



Georgia Shank

cc Senator Frank Watson
cc Representative Ron Stephens