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Firm No. 14503

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CLERK'S OFFICE

JUL 27 2006

STATE OF ILLINOIS
Pollution Control Board

A 006-56

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD
PETITION FOR REVIEW

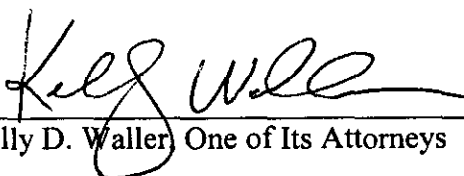
ILLINOIS ENVIRONMENTAL PROTECTION AGENCY,)	
)	
)	
Complainant,)	PR
)	
v.)	(IEPA No. 128-06-PR)
)	
LAKE WILDWIND PARK, L.L.C.,)	
)	
Defendants.)	

NOTICE OF FILING

TO: Michelle Ryan
Division of Legal Counsel
Illinois Environmental Protection Agency
1021 North Grand Avenue East
P.O. Box 19276
Springfield, Illinois 62794-9276

YOU ARE HEREBY NOTIFIED that on July 27, 2006, there was filed with Clerk of the Illinois Pollution Board, **RESPONDENT LAKE WILDWIND PARK, L.L.C.'s APPEARANCE and PETITION FOR REVIEW**, a copy of which is attached and hereby served upon you.

LAKE WILDWIND PARK, L.L.C.

By: 
Kelly D. Waller, One of Its Attorneys

Stephen T. Grossmark
Kelly D. Waller
Tressler, Soderstrom, Maloney & Priess, LLP
Sears Tower, 22nd Floor
233 South Wacker Drive
Chicago, Illinois 60606-6399
(312) 627-4000
Attorneys for Respondent—LAKE WILDWIND PARK, L.L.C.

CERTIFICATE OF SERVICE

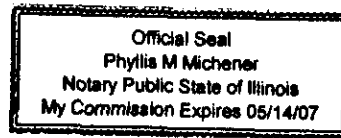
The undersigned, being first duly sworn on oath, deposes and says that he/she served the foregoing Notice of Filing, Appearance and Petition for Review therein by mailing copies to the parties listed at the addresses indicated above and by mailing same in the U.S. Mail at 233 South Wacker Drive, Chicago, Illinois on the 27th day of July, 2006.

Kelly Walle

SUBSCRIBED AND SWORN TO BEFORE ME
this 27th day of July, 2006.

Phyllis M. Michener

NOTARY PUBLIC



BEFORE THE ILLINOIS POLLUTION CONTROL BOARD
PETITION FOR REVIEW

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STATE OF ILLINOIS
Pollution Control Board

Ac06-56

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY,)	
)	
)	
Complainant,)	PR
)	
v.)	(IEPA No. 128-06-PR)
)	
LAKE WILDWIND PARK, L.L.C.,)	
)	
Defendants.)	

APPEARANCE

The undersigned, as attorney, enters the appearance of the Respondent, LAKE WILDWIND PARK, L.L.C.

LAKE WILDWIND PARK, L.L.C.

By: *Kelly D. Waller*
Kelly D. Waller, One of Its Attorneys

Stephen T. Grossmark
Kelly D. Waller
Tressler, Soderstrom, Maloney & Priess, LLP
Sears Tower, 22nd Floor
233 South Wacker Drive
Chicago, Illinois 60606-6399
(312) 627-4000

Attorneys for Respondent - LAKE WILDWIND PARK, L.L.C.

I certify that a copy of the within instrument was served on all parties who have appeared and have not heretofore been found by the Court to be in default for failure to plead.

Kelly D. Waller
Kelly D. Waller, Attorney for Respondent,
LAKE WILDWIND PARK, L.L.C.

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD
PETITION FOR REVIEW

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STATE OF ILLINOIS
Pollution Control Board

ILLINOIS ENVIRONMENTAL PROTECTION)
AGENCY,)

Complainant,)

PR

v.)

(IEPA No. 128-06-PR)

LAKE WILDWIND PARK, L.L.C.,)

Respondent.)

A 206-56

PETITION FOR REVIEW

JURISDICTION

This Petition for Review is submitted pursuant to Section 31.1 of the Illinois Environmental Protection Act ("Act"), 415 ILCS 5/31.1.

FACTS

1. Lake Wildwind Park, L.L.C. ("Respondent" or "Lake Wildwind") admits that it is the present owner and operator of a facility located at 120 Hollyhock Lane, Woodford County, Illinois. Lake Wildwind neither admits nor denies the remaining allegations contained in Paragraph 1 and affirmatively states that it does not possess sufficient knowledge to form a belief as to the truth or falsity of said allegations and demands strict proof thereof.

2. Lake Wildwind denies that said facility is an open dump operating without an Illinois Environmental Protection Agency Permit. Lake Wildwind neither admits nor denies the remaining allegations contained in Paragraph 2 and affirmatively states that it does not possess sufficient knowledge to form a belief as to the truth or falsity of said allegations and demands strict proof thereof.

3. Lake Wildwind admits that it has operated a mobile home park at the facility. It neither admits nor denies the remaining allegations of Paragraph 3 and affirmatively states that it

does not possess sufficient knowledge to form a belief as to the truth or falsity of said allegations and demands strict proof thereof.

4. Lake Wildwind admits that on May 4, 2006, Jeff Port of the Illinois Environmental Protection Agency's ("IEPA") Peoria Regional Office inspected the above-described facility. Lake Wildwind neither admits nor denies the remaining allegations of Paragraph 4 and affirmatively states that it does not possess sufficient knowledge to form a belief as to the truth or falsity of said allegations and demands strict proof thereof.

VIOLATIONS

Lake Wildwind denies each and every allegation contained in the introduction to this section of the citation and Paragraphs 1 and 2, including for the reason that it did not cause or allow any alleged violation.

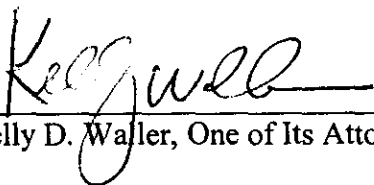
CIVIL PENALTY

Lake Wildwind denies any and all allegations of this section including that a civil penalty or any costs should be imposed against Lake Wildwind.

WHEREFORE the Respondent, LAKE WILDWIND PARK, L.L.C., petitions for review of the matters set out in and raised by IEPA's Administrative Citation and requests that the Illinois Pollution Control Board find that it has not been in violation of the Act as alleged in the Administrative Citation, reverse the finding of the violations alleged therein and enter judgment in its favor and against Complainant.

Respectfully submitted,

LAKE WILDWIND PARK, L.L.C.

By: 
Kelly D. Waller, One of Its Attorneys

Stephen T. Grossmark
Kelly D. Waller
Tressler, Soderstrom, Maloney & Priess, LLP
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Attorneys for Respondent—LAKE WILDWIND PARK, L.L.C.