

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

**RECEIVED**  
CLERK'S OFFICE

APR 22 2008

STATE OF ILLINOIS  
Pollution Control Board  
v.

PEOPLE OF THE STATE OF ILLINOIS, )  
 Complainant, )  
 )  
 )  
 AET ENVIRONMENTAL INC., a Colorado )  
 Corporation, and E.O.R. ENERGY, LLC, a )  
 Colorado limited liability company, )  
 )  
 Respondent. )

PCB 07-95

Enforcement

**NOTICE OF FILING**

PLEASE TAKE NOTICE that I have today filed with the Office of the Clerk of the Pollution Control Board the Respondent's Answer to the Complainant's Complaint and my Appearance on behalf of AET ENVIRONMENTAL INC., a Colorado Corporation, copies of which are hereby served upon you.



Lori M. DeVito

*April 2007*  
May 14, 2007

Lori M. DeVito  
AET Environmental, Inc.  
14 Lakeside Lane  
Denver, CO 80212  
(303) 333-8521



BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

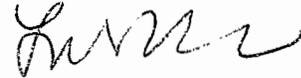
PEOPLE OF THE STATE OF ILLINOIS, )  
Complainant, )  
)  
AET ENVIRONMENTAL INC., a Colorado )  
Corporation, and E.O.R. ENERGY, LLC, a )  
Colorado limited liability company, )  
)  
Respondent. )

PCB 07-95  
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Pollution Control Board

**APPEARANCE**

I hereby file my appearance pro se, as a non-attorney, on behalf of AET ENVIRONMENTAL, INC., a Colorado Corporation.



\_\_\_\_\_  
Lori M. DeVito

Lori M. DeVito  
AET Environmental, Inc.  
14 Lakeside Lane  
Denver, CO 80212  
(303) 333-8521

**CERTIFICATE OF SERVICE**

I, the undersigned, certify that I have served the attached Respondent's Answer to Complainant's Complaint and my Appearance on behalf of AET ENVIRONMENTAL INC., a Colorado Corporation, by first class mail on April 14, 2008 upon the following party:

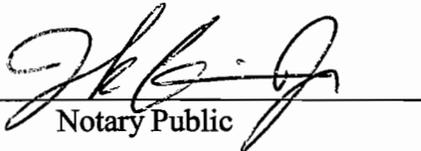
Michael D. Mankowski  
Assistant Attorney General  
Illinois Attorney General's Office  
500 S. Second St.  
Springfield, Illinois 62706



Lori M. DeVito

NOTARY SEAL  
FRANK W. GINES JR.  
NOTARY  
PUBLIC  
STATE OF COLORADO

SUBSCRIBED AND SWORN TO ME this 14<sup>th</sup>  
day of April, 20 08



Notary Public

April 14, 2008

John T. Therriault, Assistant Clerk  
Illinois Pollution Control Board  
James R. Thompson Center, Ste. 11-500  
100 West Randolph  
Chicago, Illinois 60601

RE: People v. AET Environmental, Inc., a Colorado corp., and E.O.R. Energy, LLC, a Colorado limited liability company.  
PCB 07-95

Dear Sir:

Enclosed for filing please find the original and five copies of a Notice of Filing and RESPONDENT'S answers to COMPLAINANT'S REQUEST TO ADMIT FACTS BY AET ENVIRONMENTAL, INC., in regard to the above-captioned matter. Please file the originals and return file-stamped copies to me in the enclosed, self-addressed envelope.

Sincerely,



Lori M. DeVito

encl.

***Source Environmental, Inc.***

***Denver:*** 14 Lakeside Ln. • Denver, CO 80212 • 303-333-8521  
***Salt Lake:*** 3653 So. 700 W • Salt Lake City, UT 84119 • 801-281-3507  
***Las Vegas:*** 3725 West Teco Ave. • Las Vegas, NV 89118 • 702-436-6228  
***Panama City:*** 3160 Airport Rd. • Panama City, FL 32405 • 850-873-8070



BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

PEOPLE OF THE STATE OF ILLINOIS, )  
Complainant, )  
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)  
AET ENVIRONMENTAL INC., a Colorado )  
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**RESPONDENT'S ANSWER TO COMPLAINANT'S COMPLAINT**

The Respondent, AET ENVIRONMENTAL INC., a Colorado Corporation, arguing on its own behalf, herein responds to the Complainant's Complaint as provided in Section 103.204(d) of the Board's rules.

**COMPLAINANT'S REQUEST TO ADMIT FACTS BY AET ENVIRONMENTAL, INC.**

1. In response to item 1, the Respondent is without knowledge or information as to the definition of "hazardous waste broker" sufficient to form a belief as to the truth of the allegations.
2. In response to item 2, the Respondent is without knowledge or information sufficient as to the meaning of the term "handles" to form a belief as to the truth of the allegations.
3. In response to item 3, the Respondent admits the allegations.
4. In response to item 4, the Respondent admits the allegations.
5. In response to item 5, the Respondent admits the allegations.
6. In response to item 6, the Respondent admits the allegations.
7. In response to item 7, the Respondent admits the allegations.
8. In response to item 8, the Respondent admits the allegations.
9. In response to item 9, the Respondent admits the allegations.
10. In response to item 10, the Respondent admits the allegations.

11. In response to item 11, the Respondent admits the allegations.
12. In response to item 12, the Respondent admits the allegations.
13. In response to item 13, the Respondent admits the allegations.
14. In response to items 14, the Respondent admits the allegations.
15. In response to item 15, the Respondent is without knowledge or information sufficient to form a belief as to the truth of the allegations.
16. In response to item 16, the Respondent believes the statements to be true but has no direct knowledge or information sufficient as to form an opinion as to the accuracy of the statements.
17. In response to item 17, the Respondent believes the statements to be true but has no direct knowledge or information sufficient as to form an opinion as to the accuracy of the statements.
18. In response to item 18, the Respondent believes the statements to be true but has no direct knowledge or information sufficient as to form an opinion as to the accuracy of the statements.
19. In response to item 19, the Respondent believes the statements to be true but has no direct knowledge or information sufficient as to form an opinion as to the accuracy of the statements.
20. In response to item 20, the Respondent does not understand the meaning of “hired to remove” nor believes that the date of July 15, 2002 is correct.
21. In response to item 21, the Respondent denies that it was hired to dispose of any materials.
22. In response to item 22, the Respondent admits to having a supplier deliver totes to Luxury Wheels in July of 2002.
23. In response to item 23, the Respondent admits the totes were ordered from Grief Bros and were delivered directly to Luxury Wheels.
- 24-25. In response to items 24 and 25, the Respondent believes the statements to be true.
26. In response to item 26, the Respondent is without knowledge or information sufficient to form a belief as to the truth of the allegations.
27. In response to item 27, the Respondent denies the allegations.
28. In response to item 28, the Respondent denies the allegations.
29. In response to item 29, the Respondent believes the statement to be true but is without sufficient knowledge or information to form a belief and to the truth of the allegations.

30. In response to item 30, the Respondent denies that the statement fully discloses the creation of the profile as to the involvement of all parties.
- 31-32. In response to item 31 and 32, the Respondent believes the statement to be correct.
33. In response to item 33, the Respondent denies the allegation.
- 34-41. In response to item 34 through 41, the Respondent believes the statements to be substantially true.
42. In response to item 42, the Respondent denies that the statement fully discloses the creation of the manifest as to the involvement of all parties.
- 43-46. In response to items 43 through 46, the Respondent believes the statements to be substantially correct.
47. In response to item 47, the Respondent denies the allegation.
- 48-49. In response to items 48 and 49, the Respondent believes the statements to be substantially correct.
50. In response to item 50, the Respondent does not have sufficient knowledge or information to attest to the validity of the statement due to the overly broad and ambiguous nature of the statement.
51. In response to item 51, the Respondent denies the allegation.
52. In response to item 52, the Respondent denies the allegation.
53. In response to item 53, the Respondent denies the allegation.
54. In response to item 54, the Respondent denies the allegation.
55. In response to item 55, the Respondent does not have sufficient knowledge or information as to the nature of the description to attest to the truth of the statement.
- 56-59. In response to items 56 through 59, the Respondent believes the statements to be substantially correct.
60. In response to item 60, the Respondent is without sufficient knowledge or information in order to develop a belief as to the accuracy of the statement.
61. In response to item 61, the Respondent denies the allegation.
62. In response to item 62, the Respondent denies the allegation.

63. In response to item 63, the Respondent denies the allegation but admits that the manifest was modified at the direction of the generator.
64. In response to item 64, the Respondent denies the allegation but admits that the manifest was modified at the direction of the generator.
65. In response to item 65, the Respondent denies the allegation but admits that the manifest was modified at the direction of the generator.
66. In response to item 66, the Respondent admits to statement.
67. In response to item 67, the Respondent admits to statement.
68. In response to item 68, the Respondent denies the allegation.
69. In response to item 69, the Respondent denies the allegation but admits that a profile was created at the direction of the generator for Safety Kleen.
- 70-72. In response to items 70 through 72, the Respondent believes the statements to be correct.
73. In response to item 73, the Respondent denies the allegation.
74. In response to item 74, the Respondent admits to statement.
- 75-84. In response to items 75 through 84, the Respondent believes the statements to be substantially correct.
85. In response to item 85, the Respondent denies the allegation.
86. In response to item 86, the Respondent denies the allegation.
- 87-88. In response to items 87 and 88, the Respondent denies the allegation.
89. In response to item 89, the Respondent denies the statement, the material arrived in a semi trailer and was not moved.
- 90-92. In response to items 90 through 92, the Respondent admits that the statements are substantially correct.
93. In response to item 93, the Respondent denies the allegation.
94. In response to item 94, the Respondent admits to the statement.
95. In response to item 95, the Respondent denies the allegation.

96. In response to item 96, the Respondent denies the allegation.
97. In response to item 97, the Respondent denies the allegation.
- 98-106. In response to items 98 through 106, the Respondent denies the allegations.
107. In response to item 107, the Respondent does not have sufficient knowledge or information so as to form a belief as to the truth of the statement.
108. In response to item 108, the Respondent denies the truth of the statement.
109. In response to item 109, the Respondent denies the truth of the statement.
110. In response to item 110, the Respondent denies the truth of the statement.
111. In response to item 111, the Respondent deems the allegation to be ambiguous and is without sufficient knowledge or information in order to develop a belief as to the truth of the statement.
112. In response to item 112, the Respondent deems the allegation to be ambiguous and is without sufficient knowledge or information in order to develop a belief as to the truth of the statement.
113. In response to item 113, the Respondent denies the allegation.
114. In response to item 114, the Respondent denies the allegation but admits that material was added at the direction of the generator.
115. In response to item 115, the Respondent denies the allegation but admits that material was added at the direction of the generator.
116. In response to item 116, the Respondent denies the allegation but admits that the material was redistributed for the later convenience of use at the direction on the generator.
117. In response to item 117, the Respondent admits to the statement.
118. In response to item 118, the Respondent admits to the statement.
119. In response to item 119, the Respondent denies the allegation.
120. In response to item 120, the Respondent denies the allegation.
121. In response to item 121, the Respondent denies the allegation.
122. In response to item 122, the Respondent believes the statement to be correct.

123. In response to item 123, the Respondent is without knowledge or information sufficient in order to develop a belief as to the truth of the statement.

124. In response to item 124, the Respondent denies the allegation.

125. In response to item 125, the Respondent deems the allegation to be ambiguous and is without sufficient knowledge or information in order to develop a belief as to the truth of the statement

126. In response to item 126, the Respondent denies the allegation.

127. In Response to item 127, the Respondent deems the allegation to be ambiguous and is without sufficient knowledge or information in order to form a belief as to the truth of the statements.

128 to

137. In response to items 128 through 137, the Respondent believes the statements to be substantially correct, and all were performed at the direction of the generator.

138. In response to item 138, the Respondent is without knowledge or information sufficient to know the accuracy of the statement.

139. In response to item 139, the Respondent admits to the statement.

Respectfully submitted,



---

Lori M. Devito

Lori M. Devito  
AET Environmental, Inc.  
14 Lakeside Lane  
Denver, CO 80212  
(303) 333-8521