

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

PEOPLE OF THE STATE OF ILLINOIS,)	
)	
Complainant,)	
)	
v.)	PCB No. 10-
)	(Enforcement - Water)
ROBERT MILLER, doing business as)	
MIL-R-MOR FARM,)	
)	
Respondent.)	

NOTICE OF FILING

To: See Attached Service List.
(VIA ELECTRONIC FILING)

PLEASE TAKE NOTICE that I have today filed with the Office of the Clerk of the Pollution Control Board the Complainant's Complaint for Civil Penalties, a copy of which is herewith served upon you.

Failure to file an answer to this complaint within 60 days may have severe consequences. Failure to answer will mean that all allegations in the complaint will be taken as if admitted for purposes of this proceeding. If you have any questions about this procedure, you should contact the hearing officer assigned to this proceeding, the Clerk's Office or an attorney.

LISA MADIGAN
Attorney General
State of Illinois


JENNIFER A. VAN WIE

Dated: December 15, 2009

Jennifer A. Van Wie
Assistant Attorney General
Environmental Bureau
Illinois Attorney General's Office
69 W. Washington Street, Suite 1800
Chicago, Illinois 60602
(312) 814-0609

THIS FILING IS SUBMITTED ON RECYCLED PAPER

SERVICE LIST

Lyle Krug
Plager, Krug & Bauer, Ltd.
10 North Galena Avenue
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Freeport, IL 61032-0839

Charles Gunnarson
Division of Legal Counsel
Illinois Environmental Protection Agency
1021 North Grand Avenue East
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Springfield, Illinois 62794-9276

CERTIFICATE OF SERVICE

I, the undersigned, certify that I have served the attached Complaint for Civil Penalties, by U.S. Certified Mail (return receipt requested), upon the following persons:

Lyle Krug
Plager, Krug & Bauer, Ltd.
10 North Galena Avenue
P.O. Box 839
Freeport, IL 61032-0839

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MIL-R-MOR FARM,)	
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Respondent.)	

COMPLAINT FOR CIVIL PENALTIES

Complainant, PEOPLE OF THE STATE OF ILLINOIS, by LISA MADIGAN, Attorney General of the State of Illinois, complains of Respondent, ROBERT MILLER, doing business as MIL-R-MOR FARM, as follows:

COUNT I
WATER POLLUTION

1. This Complaint is brought on behalf of the People of the State of Illinois by Lisa Madigan, Attorney General of the State of Illinois, on her own motion and at the request of the Illinois Environmental Protection Agency ("Illinois EPA") pursuant to the terms and provisions of Section 31 of the Illinois Environmental Protection Act ("Act"), 415 ILCS 5/31 (2008), and is an action for civil penalties.

2. The Illinois EPA is an administrative agency established in the executive branch of the State government by Section 4 of the Act, 415 ILCS 5/4 (2008), and is charged, *inter alia*, with the duty of enforcing the Act. This Count is brought pursuant to Section 31 of the Act, 415 ILCS 5/31 (2008).

3. Since approximately 2006, the exact date being better known by the Respondent, Respondent Robert Miller has owned and operated Mil-R-Mor Farm.

4. Mil-R-Mor Farm ("the Farm") is a 1,300 acre dairy farm. The Farm consists of two separate parcels: 765 East Rock Grove Road, Orangeville, Stephenson County, Illinois; and, 1984 Hickory Grove Road, Dakota, Stephenson County, Illinois.

5. The Farm has approximately 130 milk cows, 50 heifers over one year old, and 50 heifers under one year old.

6. Most of the Farm is used for crop production and grazing land, with the crop ground providing land application areas for manure generated from the Farm. The Farm generally operates in a scrape-and-haul fashion, with little storage of manure prior to its field application. The variety of crops planted at the Farm ensures that unplanted fields are available to land-apply the manure.

7. On February 29, 2008, an Illinois EPA inspector visited the Farm. He observed an unprotected manure pile ("Manure Pile") on the Farm at a location south of Rock Grove Road near Afolkey Road ("Site"). The Manure Pile did not have adequate runoff control structures to collect and contain discharges containing livestock waste and direct it to an appropriate holding or disposal facility.

8. Additionally, the Illinois EPA inspector observed at the Site that manure from the Farm had been previously land-applied to a corn field that had been harvested for silage. No cover crop had been seeded to the barren field to reduce the threat of manure-contaminated runoff.

9. The approximately 50 acres of cropland located at the Site drains into a low-lying area that further discharges into a small tributary located on the adjoining land owner's property that ultimately discharges to Brush Creek.

10. Furthermore, the Illinois EPA inspector observed a small amount of brown

runoff water discharging toward the property line, near the low-lying area leading to the small tributary.

11. The Illinois EPA inspector observed a potential threat of manure-contaminated runoff to the small tributary during rain and/or thaw conditions.

12. On March 4, 2008, the Illinois EPA inspector conducted a follow-up inspection at the Site. The Manure Pile that had been observed on February 29, 2008 was removed. However, the inspector observed brown, manure-contaminated wastewater exiting the Site and entering the small tributary causing color and turbidity of other than natural origin.

13. On March 12, 2008, the Illinois EPA sent a non-compliance advisory letter to Mil-R-Mor Farm care of Craig Miller, son of Respondent Robert Miller. The non-compliance advisory letter cited inadequate storage and application of livestock wastes and discharge of livestock-contaminated stormwater from the Farm.

14. On March 28, 2008, Craig Miller responded on behalf of Mil-R-Mor Farm to the non-compliance advisory letter. The letter stated that the Manure Pile at the Site had been moved and spread on a new location away from waterways. The letter indicated that manure from the Farm was now being hauled and land applied to locations away from any streams.

15. On April 11, 2009, the Illinois EPA sent a letter setting forth its determination that Craig Miller's letter, on behalf of Mil-R-Mor Farm, was not responsive to the suggestions made in the non-compliance advisory letter and that a nutrient management plan ("NMP") should be developed. A NMP is a planning tool that identifies the amount, source, time of application and placement of each nutrient needed to produce each crop grown on each field each year.

16. On April 28, 2008, Respondent Robert Miller responded to the Illinois EPA's letter dated April 11, 2008. The letter indicated that the Farm has several days of manure storage

capacity in their concrete structures and noted that the manure pile was immediately cleaned up once Mil-R-Mor Farm was advised of the violation.

17. On May 22, 2008, the Illinois EPA sent a violation notice (“VN”) to Mil-R-Mor Farm care of Robert Miller.

18. On June 3, 2008, Respondent Robert Miller responded to the VN. He reiterated that the manure pile had been relocated immediately after the Illinois EPA’s February 29, 2008 inspection and that he had contacted the Natural Resources Conservation Service about developing a comprehensive manure management plan (“CNMP”). A CNMP encompasses the information contained in a NMP, but is designed specifically to address those needs of a livestock operation including waste management requirements. The CNMP also includes additional practices to control erosion and address issues such as nutrient and water storage, infiltration, aeration, tith, and diversity of soil organisms.

19. On July 23, 2008, a meeting was held between Respondent Robert Miller and the Illinois EPA. The Illinois EPA again requested that a NMP be developed and implemented at the Farm. Respondent Robert Miller agreed to submit the NMP to IEPA by August 14, 2008.

20. On August 14, 2008, Respondent Robert Miller reported that he did not have all the information for the NMP, but that he planned to provide a complete response by the end of August 2008.

21. On September 11, 2008, the Illinois EPA sent a compliance commitment agreement rejection letter because it did not receive the information promised by Respondent Robert Miller on or before the end of August.

22. Between October and December of 2008, Respondent Robert Miller and the Illinois EPA exchanged correspondence regarding the submission of a NMP. Respondent was

given until November 30, 2008 to submit a NMP to the Illinois EPA. Respondent did not submit a NMP by the November 30, 2008 deadline given by the Illinois EPA.

23. On February 10, 2009, the Illinois EPA sent Robert Miller a Notice of Intent to Pursue Legal Action (“NIPLA”) letter.

24. On February 13, 2009, Respondent Robert Miller responded to the NIPLA letter. He indicated that he was working to develop a CNMP and described the progress made in developing the plan and the next steps in completing the plan.

25. On July 31, 2009, Respondent Robert Miller submitted a NMP to the Illinois EPA.

26. On November 2, 2009, Respondent Robert Miller submitted a CNMP to the Illinois EPA.

27. Section 12(a) of the Act, 415 ILCS 5/12 (2008), provides as follows:

No person shall:

- (a) Cause or threaten or allow the discharge of any contaminants into the environment in any State so as to cause or tend to cause water pollution in Illinois, either alone or in combination with matter from other sources, or so as to violate regulations or standards adopted by the Pollution Control Board under this Act.

28. Section 3.315 of the Act, 415 ILCS 5/3.315 (2008), provides the following definition:

“Person” is any individual, partnership, co-partnership, firm, company, limited liability company, corporation, association, joint stock company, trust, estate, political subdivision, state agency, or any other legal entity, or their legal representative, agent or assigns.

29. Respondent Robert Miller is a “person” as that term is defined in Section 3.315 of the Act, 415 ILCS 5/3.315 (2008).

30. Section 3.165 of the Act, 415 ILCS 5/3.165 (2008), provides the following definition:

“Contaminant” is any solid, liquid, or gaseous matter, any odor, or any form of energy, from whatever source.

31. Manure and manure-containing runoff are each a “contaminant” as that term is defined by Section 3.165 of the Act, 415 ILCS 5/3.165 (2008).

32. Section 3.545 of the Act, 415 ILCS 5/3.545 (2008), provides the following definition:

“Water pollution” is such alteration of the physical, thermal, chemical, biological or radioactive properties of any waters of the State, or such discharge of any contaminant into any waters of the State, as will or is likely to create a nuisance or render such waters harmful or detrimental or injurious to public health, safety or welfare, or to domestic, commercial, industrial, agricultural, recreational, or other legitimate uses, or to livestock, wild animals, birds, fish, or other aquatic life.

33. Section 3.550 of the Act, 415 ILCS 5/3.550 (2008), provides the following definition:

“Waters” means all accumulations of water, surface and underground, natural, and artificial, public and private, or parts thereof, which are wholly or partially within, flow through, or border upon this State.

34. The small tributary located on the adjoining land owner’s property and Brush Creek are “waters” as that term is defined in Section 3.550 of the Act, 415 ILCS 5/3.550 (2008).

35. The Respondent caused, threatened and allowed the discharge of contaminants, such as manure and manure-containing runoff, into waters of the State such that they will or are likely to create a nuisance or render such waters harmful or detrimental or injurious.

36. By failing to adequately store and spread livestock waste at the Farm to prevent such wastes from discharging to the environment, Respondent caused and threatened “water pollution” as that term is defined by Section 3.545 of the Act, 415 ILCS 5/3.545 (2008).

37. The Respondent, by causing and threatening the discharge of manure and manure-containing runoff into the small tributary so as to cause water pollution, has violated Section 12(a) of the Act, 415 ILCS 5/12(a) (2008).

WHEREFORE, Complainant, PEOPLE OF THE STATE OF ILLINOIS, respectfully requests that the Board enter an order against Respondent, ROBERT MILLER, doing business as MIL-R-MOR FARM, for the following relief:

1. Authorize a hearing in this matter at which time Respondent will be required to answer the allegations herein;
2. Find that Respondent has violated Section 12(a) of the Act, 415 ILCS 5/12(a) (2008);
3. Order Respondent to cease and desist from any further violations of Section 12(a) of the Act, 415 ILCS 5/12(a) (2008);
4. Order the Respondent to develop and implement a comprehensive nutrient management plan for the Farm;
5. Assess against the Respondent a civil penalty of Fifty Thousand Dollars (\$50,000.00) for each violation of the Act and Board regulations, and an additional civil penalty of Ten Thousand Dollars (\$10,000.00) for each day of violation;
6. Order Respondent to pay all costs, pursuant to Section 42(f) of the Act, 415 ILCS 5/42(f) (2008), including attorney, expert witness and consultant fees expended by the State in its pursuit of this action; and
7. Grant such other relief as the Board deems appropriate and just.

COUNT II
WATER POLLUTION HAZARD

1-26. Complainant realleges and incorporates by reference Paragraphs 1 through 26 of Count I as Paragraphs 1 through 26 of this Count II.

27. Section 12(d) of the Act, 415 ILCS 5/12(d) (2008), provides as follows:

No person shall:

- (d) Deposit any contaminants upon the land in such place and manner so as to create a water pollution hazard.

28-35. Plaintiff realleges and incorporates by reference herein paragraphs 28 through 35 of Count I as paragraphs 28 through 35 of this Count II.

36. Respondent, by stockpiling manure in an area close to surface waters without containment structures and by land-applying manure on fields where no cover crop had been seeded to prevent manure-contaminated runoff to surface waters, deposited contaminants on the land so as to cause water pollution.

37. By depositing contaminants on land so as to cause water pollution, Respondent thereby violated Section 12(d) of the Act, 415 ILCS 5/12(d) (2008).

WHEREFORE, Complainant, PEOPLE OF THE STATE OF ILLINOIS, respectfully requests that the Board enter an order against Respondent, ROBERT MILLER, doing business as MIL-R-MOR FARM, for the following relief:

1. Authorize a hearing in this matter at which time Respondent will be required to answer the allegations herein;
2. Find that Respondent has violated Section 12(d) of the Act, 415 ILCS 5/12(d) (2008);
3. Order Respondent to cease and desist from any further violations of Section 12(d)

of the Act, 415 ILCS 5/12(d) (2008);

4. Order the Respondent to develop and implement a comprehensive nutrient management plan for the Farm;

5. Assess against the Respondent a civil penalty of Fifty Thousand Dollars (\$50,000.00) for each violation of the Act and Board regulations, and an additional civil penalty of Ten Thousand Dollars (\$10,000.00) for each day of violation;

6. Order Respondent to pay all costs, pursuant to Section 42(f) of the Act, 415 ILCS 5/42(f) (2008), including attorney, expert witness and consultant fees expended by the State in its pursuit of this action; and

7. Grant such other relief as the Board deems appropriate and just.

COUNT III
VIOLATION OF THE GENERAL USE WATER QUALITY STANDARDS

1-34. Plaintiff realleges and incorporates by reference herein paragraphs 1 through 34 of Count I as paragraphs 1 through 34 of this Count III.

35. Pursuant to authority granted in Sections 13 and 27 of the Act, 415 ILCS 5/13 and 5/27 (2008), the Board has promulgated rules and regulations to control water pollution in Illinois, codified at 35 Ill. Adm. Code Subtitle C, Chapter I (“Board Water Pollution regulations”).

36. Part 302 of the Board Water Pollution regulations, 35 Ill. Adm. Code Part 302, establishes general use water quality standards for non-specified waters of the State of Illinois.

37. Section 302.203 of the Board Water Pollution regulations, 35 Ill. Adm. Code 302.203, provides, in pertinent part, as follows:

Offensive Conditions

Waters of the State shall be free from sludge or bottom deposits, floating debris, visible oil, odor, plant or algal growth, color or turbidity of other than natural origin...

38. As observed during the Illinois EPA inspection of March 4, 2008, discharge of livestock waste from the Site caused color and turbidity of other than natural origin in a small tributary, in violation of 35 Ill. Admin. Code 302.203.

39. By causing and allowing offensive conditions in violation of Section 302.203 of the Board Water Pollution regulations, 35 Ill. Adm. Code 302.203, Respondent thereby violated Section 12(a) of Act, 415 ILCS 5/12(a) (2008).

WHEREFORE, Complainant, PEOPLE OF THE STATE OF ILLINOIS, respectfully requests that the Board enter an order against Respondent, ROBERT MILLER, doing business as MIL-R-MOR FARM, for the following relief:

1. Authorize a hearing in this matter at which time Respondent will be required to answer the allegations herein;
2. Find that Respondent has violated Section 12(a) of the Act, 415 ILCS 5/12(a) (2008), and Section 302.203 of the Board Water Pollution regulations, 35 Ill. Adm. Code 302.203;
3. Order Respondent to cease and desist from any further violations of Section 12(a) of the Act, 415 ILCS 5/12(a) (2008), and Section 302.203 of the Board Water Pollution regulations, 35 Ill. Adm. Code 302.203;
4. Order the Respondent to develop and implement a comprehensive nutrient management plan for the Farm;
5. Assess against the Respondent a civil penalty of Fifty Thousand Dollars

(\$50,000.00) for each violation of the Act and Board regulations, and an additional civil penalty of Ten Thousand Dollars (\$10,000.00) for each day of violation;

6. Order Respondent to pay all costs, pursuant to Section 42(f) of the Act, 415 ILCS 5/42(f) (2008), including attorney, expert witness and consultant fees expended by the State in its pursuit of this action; and

7. Grant such other relief as the Board deems appropriate and just.

COUNT IV
FAILURE TO PROVIDE ADEQUATE STRUCTURES TO CONTROL
LIVESTOCK WASTE RUNOFF

1-34. Plaintiff realleges and incorporates by reference herein paragraphs 1 through 34 of Count III as paragraphs 1 through 34 of this Count IV.

35. Part 501, Subpart C, of the Board Water Pollution regulations, 35 Ill. Adm. Code Part 501, provides operational rules which require owners and operators of livestock management facilities to come into compliance with Clean Water Act (“CWA”) and National Pollutant Discharge Elimination System (“NPDES”) filing requirements.

36. Section 501.403(a) of the Board Water Pollution regulations, 35 Ill. Adm. Code 501.403(a), provides as follows:

Protection of Livestock Management Facilities and Livestock Waste-Handling Facilities

- a) Existing livestock management facilities and livestock waste-handling facilities shall have adequate diversion dikes, walls or curbs that will prevent excessive outside surface waters from flowing through the animal feeding operation and will direct runoff to an appropriate disposal, holding or storage area. The diversions are required on all aforementioned structures unless there is negligible outside surface water which can flow through the facility or the runoff is tributary to an acceptable disposal area or a livestock waste-handling facility. If inadequate diversions cause or threaten to cause a violation of the Act or applicable regulations, the Agency may require corrective measures.

37. As observed during the Illinois EPA inspection of February 29, 2008, Respondent, by failing to provide adequate runoff control structures to collect and contain discharges containing livestock waste and direct it to an appropriate holding or disposal facility, has violated 35 Ill. Admin. Code 501.403(a).

38. By failing to provide adequate runoff control structures at the Farm in violation of Section 501.403(a) of the Board Water Pollution regulations, 35 Ill. Adm. Code 501.403(a), Respondent thereby violated Section 12(a) of Act, 415 ILCS 5/12(a) (2008).

WHEREFORE, Complainant, PEOPLE OF THE STATE OF ILLINOIS, respectfully requests that the Board enter an order against Respondent, ROBERT MILLER, doing business as MIL-R-MOR FARM, for the following relief:

1. Authorize a hearing in this matter at which time Respondent will be required to answer the allegations herein;

2. Find that Respondent has violated Section 12(a) of the Act, 415 ILCS 5/12(a) (2008), and Section 501.403(a) of the Board Water Pollution regulations, 35 Ill. Adm. Code 501.403(a);

3. Order Respondent to cease and desist from any further violations of Section 12(a) of the Act, 415 ILCS 5/12(a) (2008), and Section 501.403(a) of the Board Water Pollution regulations, 35 Ill. Adm. Code 501.403(a);

4. Order the Respondent to develop and implement a comprehensive nutrient management plan for the Farm;

5. Assess against the Respondent a civil penalty of Fifty Thousand Dollars (\$50,000.00) for each violation of the Act and Board regulations, and an additional civil penalty

of Ten Thousand Dollars (\$10,000.00) for each day of violation;

6. Order Respondent to pay all costs, pursuant to Section 42(f) of the Act, 415 ILCS 5/42(f) (2008), including attorney, expert witness and consultant fees expended by the State in its pursuit of this action; and

7. Grant such other relief as the Board deems appropriate and just.

COUNT V
FAILURE TO PROPERLY CONSTRUCT AND MAINTAIN
A TEMPORARY MANURE STACK

1-34. Plaintiff realleges and incorporates by reference herein paragraphs 1 through 34 of Count III as paragraphs 1 through 34 of this Count V.

35. Section 501.404(b)(1) of the Board Water Pollution regulations, 35 Ill. Adm. Code 501.404(b)(1), provides as follows

Handling and Storage of Livestock Waste

b) Temporary Manure Stacks

- 1) Temporary manure stacks shall be constructed or established and maintained in a manner to prevent runoff and leachate from entering surface or groundwaters.

36. As observed during the Illinois EPA inspection on February 29, 2008, the Respondent failed to construct a temporary manure stack in a manner to prevent runoff and leachate from entering surface waters, in violation of 35 Ill. Admin. Code 501.404(b)(1).

37. By failing to failing to construct a temporary manure stack at the Site in violation of Section 501.404(b)(1) of the Board Water Pollution regulations, 35 Ill. Adm. Code 501.404(b)(1), Respondent thereby violated Section 12(a) of Act, 415 ILCS 5/12(a) (2008).

WHEREFORE, Complainant, PEOPLE OF THE STATE OF ILLINOIS, respectfully requests that the Board enter an order against Respondent, ROBERT MILLER, doing business as

MIL-R-MOR FARM, for the following relief:

1. Authorize a hearing in this matter at which time Respondent will be required to answer the allegations herein;
2. Find that Respondent has violated Section 12(a) of the Act, 415 ILCS 5/12(a) (2008), and Section 501.404(b)(1) of the Board Water Pollution regulations, 35 Ill. Adm. Code 501.404(b)(1);
3. Order Respondent to cease and desist from any further violations of Section 12(a) of the Act, 415 ILCS 5/12(a) (2008), and Section 501.404(b)(1) of the Board Water Pollution regulations, 35 Ill. Adm. Code 501.404(b)(1);
4. Order the Respondent to develop and implement a comprehensive nutrient management plan for the Farm;
5. Assess against the Respondent a civil penalty of Fifty Thousand Dollars (\$50,000.00) for each violation of the Act and Board regulations, and an additional civil penalty of Ten Thousand Dollars (\$10,000.00) for each day of violation;
6. Order Respondent to pay all costs, pursuant to Section 42(f) of the Act, 415 ILCS 5/42(f) (2008), including attorney, expert witness and consultant fees expended by the State in its pursuit of this action; and
7. Grant such other relief as the Board deems appropriate and just.

COUNT VI
IMPROPER FIELD APPLICATION OF LIVESTOCK WASTES

1-34. Plaintiff realleges and incorporates by reference herein paragraphs 1 through 34 of Count III as paragraphs 1 through 34 of this Count VI.

35. Section 501.405(a) of the Board Water Pollution regulations, 35 Ill. Adm. Code

501.405(a), provides, in pertinent part, as follows:

Field Application of Livestock Waste

- a) The quantity of livestock waste applied on soils shall not exceed a practical limit as determined by soil type, especially its permeability, the condition (frozen or unfrozen) of the soil, the percent slope of the land, cover mulch, proximity to surface waters and likelihood of reaching groundwater, and other relevant considerations...

36. As observed during the Illinois EPA inspection on February 29, 2008 and March 4, 2008, the Respondent placed livestock waste upon frozen ground in close proximity to surface waters, in violation of 35 Ill. Adm. Code 501.405(a).

37. By placing livestock wastes on soils in violation of Section 501.405(a) of the Board Water Pollution regulations, 35 Ill. Adm. Code 501.405(a), Respondent thereby violated Section 12(a) of Act, 415 ILCS 5/12(a) (2008).

WHEREFORE, Complainant, PEOPLE OF THE STATE OF ILLINOIS, respectfully requests that the Board enter an order against Respondent, ROBERT MILLER, doing business as MIL-R-MOR FARM, for the following relief:

1. Authorize a hearing in this matter at which time Respondent will be required to answer the allegations herein;
2. Find that Respondent has violated Section 12(a) of the Act, 415 ILCS 5/12(a) (2008), and Section 501.405(a) of the Board Water Pollution regulations, 35 Ill. Adm. Code 501.405(a);
3. Order Respondent to cease and desist from any further violations of Section 12(a) of the Act, 415 ILCS 5/12(a) (2008), and Section 501.405(a) of the Board Water Pollution regulations, 35 Ill. Adm. Code 501.405(a);
4. Order the Respondent to develop and implement a comprehensive nutrient

management plan for the Farm;

5. Assess against the Respondent a civil penalty of Fifty Thousand Dollars (\$50,000.00) for each violation of the Act and Board regulations, and an additional civil penalty of Ten Thousand Dollars (\$10,000.00) for each day of violation;

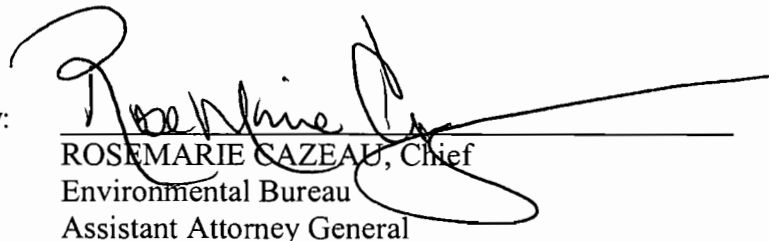
6. Order Respondent to pay all costs, pursuant to Section 42(f) of the Act, 415 ILCS 5/42(f) (2008), including attorney, expert witness and consultant fees expended by the State in its pursuit of this action; and

7. Grant such other relief as the Board deems appropriate and just.

PEOPLE OF THE STATE OF ILLINOIS,
by LISA MADIGAN, Attorney
General of the State of Illinois

MATTHEW J. DUNN, Chief
Environmental Enforcement/
Asbestos Litigation Division

By:


ROSEMARIE CAZEAU, Chief
Environmental Bureau
Assistant Attorney General

Of Counsel:

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