

State of Illinois )  
                  ) SS  
County of Sangamon )


OCT 22 1970

BEFORE THE POLLUTION CONTROL BOARD  
OF THE STATE OF ILLINOIS

Environmental Protection Agency    )  
  )  
  )           NO. PCB 70-9  
  )  
City of Springfield and Springfield )  
City Water, Light and Power Company )

MOTION FOR LEAVE TO  
AMEND THE COMPLAINT

The Environmental Protection Agency hereby moves for leave to amend its complaint in the above entitled matter. A copy of the amended complaint is attached hereto.

  
Thomas W. Scheuneman  
Chief Enforcement Officer  
Environmental Protection Agency

State of Illinois )  
                  )SS  
County of Sangamon )

OCT 27 1970

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City of Springfield and Springfield )  
City Water, Light and Power Company )

AMENDED COMPLAINT


The ENVIRONMENTAL PROTECTION AGENCY, complaining of the CITY OF SPRINGFIELD and SPRINGFIELD CITY WATER, LIGHT AND POWER COMPANY, states:

1. On July 29 and 30, 1970, the CITY OF SPRINGFIELD and SPRINGFIELD CITY WATER, LIGHT AND POWER COMPANY were observed to be emitting smoke from the Springfield City Water, Light and Power Company "Lakeside" and "Dallman" plants in violation of Rule 3-3.122 of the Rules and Regulations Governing the Control of Air Pollution, effective pursuant to Section 49(c) of the Environmental Protection Act.
2. Since July 1, 1970 the CITY OF SPRINGFIELD and SPRINGFIELD CITY WATER, LIGHT AND POWER COMPANY have operated their "Lakeside" and "Dallman" plants in violation of Rule 3-3.112 of the Rules and Regulations Governing the Control of Air Pollution, effective pursuant to Section 49(c) of the Environmental Protection Act.
3. Since July 1, 1970 the CITY OF SPRINGFIELD and SPRINGFIELD CITY WATER, LIGHT AND POWER COMPANY have operated their "Lakeside" and

"Dallman" plants so as to cause, threaten or allow air pollution in violation of Section 9(a) of the Environmental Protection Act.

4. Since July 1, 1970 the CITY OF SPRINGFIELD and SPRINGFIELD CITY WATER, LIGHT AND POWER COMPANY have operated their power plant complex (consisting of the "Lakeside" and "Dallman" plants and related property) so as to cause, threaten or allow water pollution in violation of Sections 12(a) and 12(d) of the Environmental Protection Act.

WHEREFORE: The ENVIRONMENTAL PROTECTION AGENCY asks for the entry of an order directing the CITY OF SPRINGFIELD and SPRINGFIELD CITY WATER, LIGHT AND POWER COMPANY to cease and desist the aforesaid violations, and for the assessment of a penalty in the amount of \$10,000, plus \$1,000 for each day each such violation shall be shown to have continued.

  
Thomas W. Scheuneman  
Chief Enforcement Officer  
Environmental Protection Agency