

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

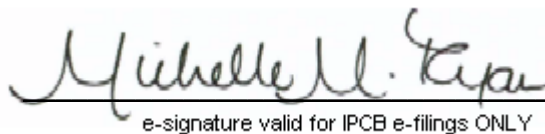
ILLINOIS ENVIRONMENTAL)	
PROTECTION AGENCY,)	
)	AC 09-46
Complainant,)	AC 08-19
)	AC 07-24
)	(Consolidated)
)	
C. JOHN BLICKHAN,)	(IEPA Nos. 94-09-AC, 23-08-AC,
)	304-06-AC)
Respondent.)	

NOTICE OF FILING

To: Thomas D. Lupo
Hinshaw & Culbertson, P.C.
222 North LaSalle Street
Suite 300
Chicago, IL 60601-1081

PLEASE TAKE NOTICE that on this date I electronically filed with the Clerk of the Pollution Control Board of the State of Illinois the following instrument(s) entitled MOTION TO WITHDRAW ADMINISTRATIVE CITATION.

Respectfully Submitted,



e-signature valid for IPCB e-filings ONLY

Michelle M. Ryan
Special Assistant Attorney General

Illinois Environmental Protection Agency
1021 North Grand Avenue East
P.O. Box 19276
Springfield, Illinois 62794-9276
(217) 782-5544

Dated: August 2, 2016

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

ILLINOIS ENVIRONMENTAL)	
PROTECTION AGENCY,)	
)	AC 09-46
Complainant,)	AC 08-19
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C. JOHN BLICKHAN,)	(IEPA Nos. 94-09-AC, 23-08-AC,
)	304-06-AC)
Respondent.)	

COMPLAINANT'S AMENDED MOTION TO
WITHDRAW ADMINISTRATIVE CITATION

NOW COMES the Complainant, the Illinois Environmental Protection Agency ("Illinois EPA"), by and through its attorney, Assistant Counsel Michelle M. Ryan, pursuant to 35 Ill. Adm. Code 101.500, and respectfully states as follows:

(1) On October 25, 2006, February 26, 2008, and May 13, 2009 , Illinois EPA issued Administrative Citations to Respondents, in the above-named cases.

(2) On June 10, 2008, Complainant filed a Motion to Consolidate the above-named cases for purposes of hearing.

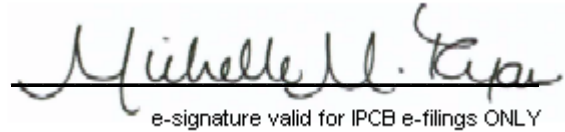
(3) Based upon facts and circumstances discovered since the filing of the Administrative Citations, Illinois EPA has determined that it is prudent to withdraw each of these Administrative Citations at this time.

(4) On August 2, 2016, Complainant filed a Motion to Withdraw Administrative Citation in the above-numbered cases with an incorrect caption. This Amended Motion corrects the caption.

WHEREFORE, the Illinois Environmental Protection Agency requests that the Board dismiss the pending actions against Respondent.

ILLINOIS ENVIRONMENTAL
PROTECTION AGENCY,
Complainant

DATED: August 3, 2016



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Michelle M. Ryan
Special Assistant Attorney General

Illinois Environmental Protection Agency
1021 North Grand Avenue East
P.O. Box 19276
Springfield, Illinois 62794-9276
(217) 782-5544

PROOF OF SERVICE

I hereby certify that I did on the 3rd day of August, 2016, send via e-mail with prior permission a true and correct copy of the following instrument(s) entitled MOTION TO WITHDRAW ADMINISTRATIVE CITATION

To: Thomas D. Lupo
Hinshaw & Culbertson, P.C.
222 North LaSalle Street
Suite 300
Chicago, IL 60601-1081
tlupo@hinshawlaw.com

and an electronic copy of the same foregoing instrument on the same date via electronic filing

To: John Therriault, Clerk
Pollution Control Board
James R. Thompson Center
100 West Randolph Street, Suite 11-500
Chicago, Illinois 60601



e-signature valid for IPCB e-filings ONLY

Michelle M. Ryan
Special Assistant Attorney General

Illinois Environmental Protection Agency
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