

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD
ADMINISTRATIVE CITATION

ILLINOIS ENVIRONMENTAL)
PROTECTION AGENCY,)
Complainant,)
vs.)
GEORGE W. WOODCOCK, JR. and,)
GEORGE W. WOODCOCK, III d/b/a)
WEST DRILLING COMPANY)
Respondents.)

AC 16-13
(IEPA No. 30-16-AC)

RECEIVED
CLERK'S OFFICE

MAR 15 2016

STATE OF ILLINOIS
Pollution Control Board



ORIGINAL

PETITION FOR REVIEW OF ORDER ENTERED
FEBRUARY 9, 2016

Now comes the Respondents, GEORGE W. WOODCOCK JR., and GEORGE W. WOODCOCK III d/b/a WEST DRILLING COMPANY, by and through their attorney, George W. Woodcock, Atty #3068579, of the Law Office of George W. Woodcock, and files this request for a Petition for Review of the Order Entered on February 9th, 2016, and in support of said petition states, to wit:

1. That the first alleged examination of the property located at 15716 Highway 1, Mount Carmel, IL was conducted by Garrison Gross on October 19th, 2015.
2. That at the time of the said inspection of the premises, ongoing operations were being performed by Respondents to make the building, and property in compliance with the rules, and regulations of the Illinois Environment Protection Agency.
3. That the investigation of the area by Respondents disclosed that former tenants of the real estate had allowed construction materials, and waste to be located on said property.
4. That contact had been made with Republic Services to

examine the site, and determine what needed to be done to place the property in compliance with the Illinois Environmental Protection Agency.

5. Republic Services, whose telephone number is 866-760-2182, was called, and a request was made by the Respondent to meet with a representative of their company in order to determine what needed to be done in order to place the dump site in compliance with the Illinois Environmental Protection Agency.

6. Republic Services, advised the Respondent to call Comelya Garret, whose telephone number is 618-731-6719. The Respondent, WEST DRILLING COMPANY, called both numbers identified above in excess of twelve times seeking to employee said company to place property in compliance. Neither Republic Services, or Comelya Garret would return the Respondent's calls.

7. Being unable to employee Republic Services, the Respondent, WEST DRILLING COMPANY, contacted Sumner Landfill, and employed the services of JEFF GUISEWITE, INC. See attached Exhibit A.

8. Attached here as Exhibit B, is a Sumner Landfill receipt showing the total weight of the construction materials, and earth.

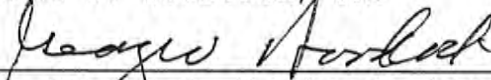
9. That attached hereto as Exhibit C, Exhibit D, Exhibit E, and Exhibit F, are pictures of the work being performed, and the steps taken to clear said area in a timely manner after the alleged violation of December 30th, 2015.

10. That attached hereto as Exhibit G, is a picture showing complete compliance with the rules, and regulation, removal of waste, and restoration of surface of said lands after the work had been completed.

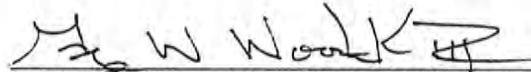
11. That Mount Carmel is a small town, and the area where the property is located in approximately one mile from town. That there are other industrial companies located in that area. That during the October 19th, 2015 inspection, the State of Illinois was in the process of rebuilding a bridge approximately one-quarter of a mile from the alleged violation. That old Illinois Highway 1 is adjacent to the area identified in Exhibit G, and was used by big trucks and vehicles, in order to avoid interfering with construction of the bridge on Illinois Highway 1.

WHEREFORE, the Respondents GEORGE W. WOODCOCK JR., and GEORGE W. WOODCOCK III d/b/a WEST DRILLING COMPANY respectfully prays that Illinois Environmental Protection Agency will acknowledge the complete compliance with its rules, and regulations concerning said property, and will withdraw its demand of Assessment of \$1,500.00 as a Civil Penalty. The Respondents also request the Administrative Citation be dismissed, and acknowledge compliance requested by the IEPA has been met.

GEORGE W. WOODCOCK, JR.


By: George W. Woodcock, his attorney

Under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief and as to such matters, the undersigned certifies as aforesaid that he verily believes the same to be true.



GEORGE W. WOODCOCK, d/b/a
WEST DRILLING COMPANY

George W. Woodcock
Attorney Registration #3068579
LAW OFFICE OF GEORGE W. WOODCOCK
Attorney at Law
120 East 5th - P.O. Drawer 400
Mount Carmel, IL 62863-0400
618-262-5131
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EX- 14

Invoice

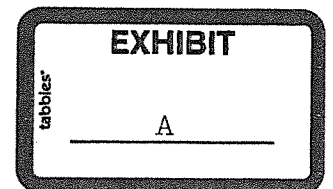
Jeff Guisewite, Inc
16153 E. 1100 Rd.
Mt. Carmel, IL 62863
(618) 262-4933
FAX: (618)262-4983

DATE	INVOICE #
3/8/2016	12393

BILL TO:
WEST DRILLING ATTN: GEORGE WOODCOCK

P.O. NUMBER	TERMS	PROJECT
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QUANTITY	DESCRIPTION	RATE	AMOUNT
	2-22-16 TO 2-29-16		
	USE OF DUMPSTER		
	UNLOADED DUMPSTER & HAULED TO LANDFILL		
1.5	DUMPSTER #9 - SET & PICK UP	70.00	70.00
3.5	MINI TRACKHOE E50	95.00	142.50
11.9	#7 PETERBILT DUMP TRUCK	80.00	280.00
	TONS OF DEBRIS	53.00	630.70



TOTAL \$1,123.20

SUMNER LANDFILL
Route 3 Box 891
Sumner, IL 62466 618-936-9202

01 929248

EX-8

JODI K.

03-02-2016 8:24 am 03-2-2016 8:36 am
GUIES8

000225
JEFF GUISEWITE, INC
16153 E1100 RD
MT CARMEL, IL 62863
3143163356

INVOICE

SCALE IN	GROSS WEIGHT	52,260	NET TONS	11.90
SCALE OUT	TARE WEIGHT	28,460	NET WEIGHT:	23,800

INBOUND

0.00 ' YD TRACKING QTY
11.90 TN SW-CONST DEBRIS CRAWFORD, IL

#

Woodcock Job

Driver Signature TRK #7 Robbie

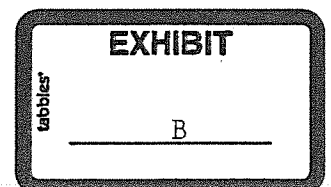




EXHIBIT
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C

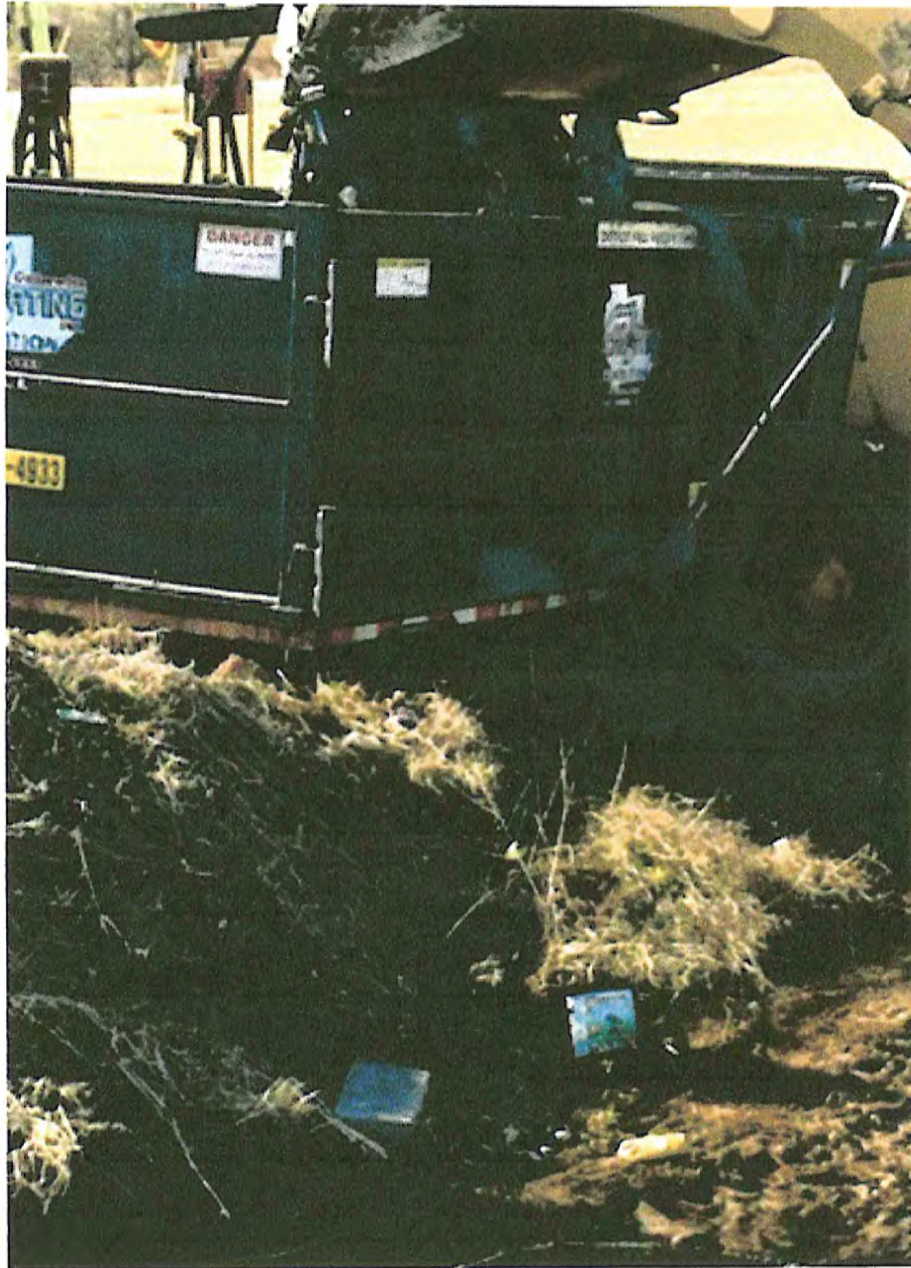


EXHIBIT
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D



EXHIBIT
E

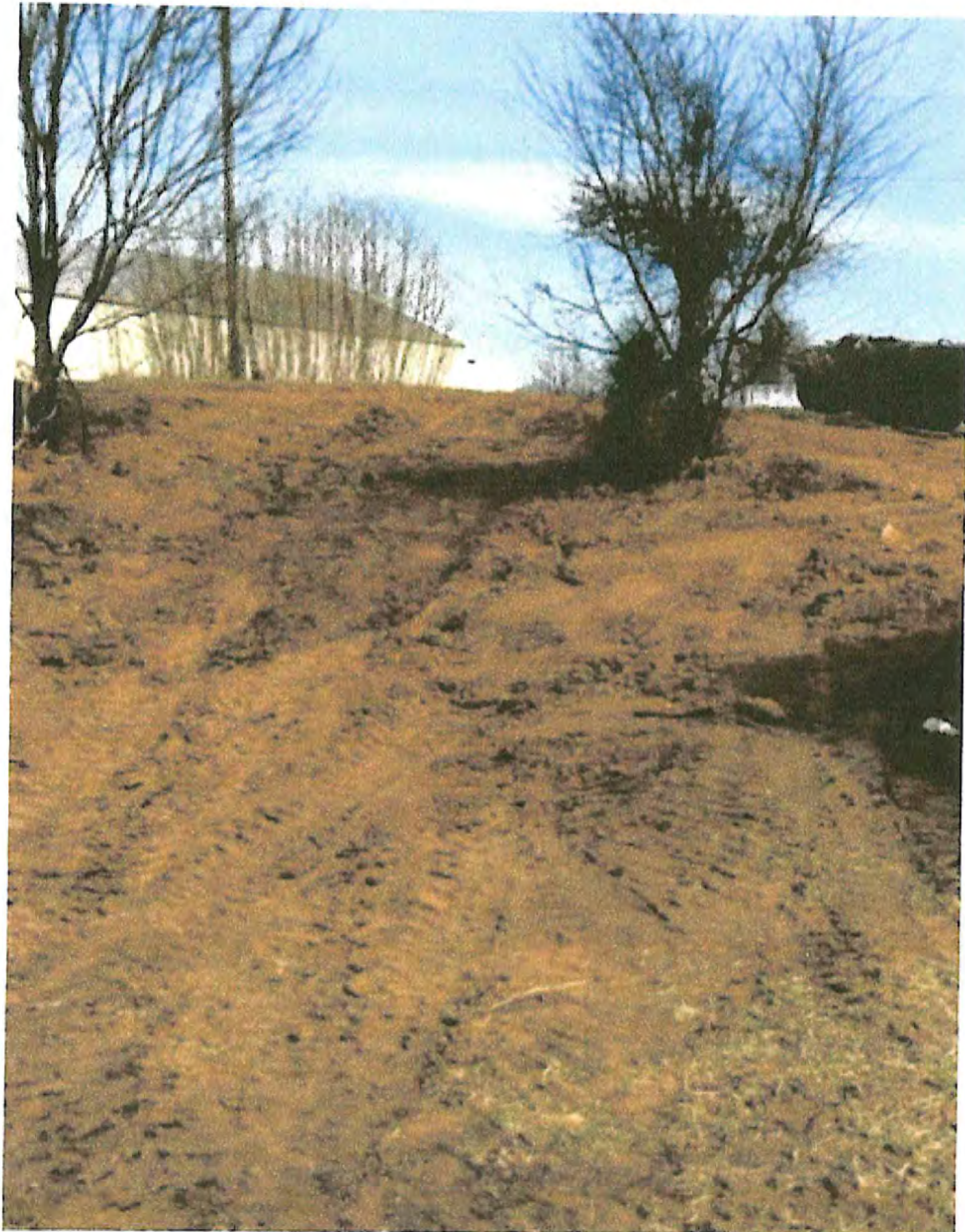


EXHIBIT
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G

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MAR 15 2016

STATE OF ILLINOIS
Pollution Control Board

GEORGE W. WOODCOCK*

gwoodcock@woodcockassociates.com

*ALSO ADMITTED IN KENTUCKY

March 9, 2016

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

AC 16-13

RE: Illinois Environmental Protection Agency vs.
George W. Woodcock, Jr, and George W. Woodcock III
d/b/a West Drilling Company
IEPA File No. 30-16-AC; 1850205044

Dear Mr. Therriault:

Enclosed herewith please find a Petition for Review of the Order Entered on February 9th, 2016, in regards to the above referenced case for all respondents.

Once my office has received the executed return service Certified Mail Receipt, I will be forwarding a copy of such to your office.

If you have any questions, please feel free to contact my office.

Respectfully yours,


George W. Woodcock

GWW/cbb

Enclosures