

**BEFORE THE ILLINOIS POLLUTION CONTROL BOARD
ADMINISTRATIVE CITATION**

ILLINOIS ENVIRONMENTAL)	
PROTECTION AGENCY,)	
)	
Complainant,)	
)	
v.)	AC14-22
)	
ROGER E. RAY,)	
)	
Respondent.)	

NOTICE OF FILING

PLEASE TAKE NOTICE that today I have filed with the Office of the Clerk of the Pollution Control Board the Appearance of William D. Ingersoll and the Petition for Review of Administrative Citation of Roger E. Ray. Copies of these documents are hereby served upon you.

To: Pollution Control Board, Attn: Clerk
100 West Randolph Street
James R. Thompson Center, Suite 11-500
Chicago, Illinois 60601-3218

Michelle M. Ryan
Division of Legal Counsel
Illinois Environmental Protection Agency
1021 North Grand Avenue, East
P.O. Box 19276
Springfield, Illinois 62794-9276

Dated: November 25, 2013

Respectfully submitted,

ROGER E. RAY,

BROWN, HAY & STEPHENS, LLP

William D. Ingersoll
Registration No. 6186363
wingersoll@bhslaw.com
205 S. Fifth Street, Suite 700
P.O. Box 2459
Springfield, IL 62705-2459
(217) 544-849

By: /s/William D. Ingersoll
His Attorney

**BEFORE THE ILLINOIS POLLUTION CONTROL BOARD
ADMINISTRATIVE CITATION**

ILLINOIS ENVIRONMENTAL)	
PROTECTION AGENCY,)	
)	
Complainant,)	
)	
v.)	AC14-22
)	
ROGER E. RAY,)	
)	
Respondent.)	

APPEARANCE

I hereby file my appearance in this proceeding, on behalf of ROGER E. RAY in the above-captioned matter.

Respectfully submitted,

ROGER E. RAY

Dated: November 25, 2013

By: /s/William D. Ingersoll
William D. Ingersoll

BROWN, HAY & STEPHENS, LLP
William D. Ingersoll
Registration No. 6186363
wingersoll@bhslaw.com
205 S. Fifth Street, Suite 700
P.O. Box 2459
Springfield, IL 62705-2459
(217) 544-8491

**BEFORE THE ILLINOIS POLLUTION CONTROL BOARD
ADMINISTRATIVE CITATION**

ILLINOIS ENVIRONMENTAL)	
PROTECTION AGENCY,)	
)	
Complainant,)	
)	
v.)	AC14-22
)	
ROGER E. RAY,)	
Respondent.)	

PETITION FOR REVIEW OF ADMINISTRATIVE CITATION

NOW COMES Respondent, ROGER E. RAY (“Respondent”), by and through his attorneys, BROWN HAY & STEPHENS, LLP, and hereby requests a review of the Administrative Citation issued by Complainant, Illinois Environmental Protection Agency (“Agency” or “IEPA”) in the above entitled case. In support of his Petition, Roger E. Ray states as follows:

1. Respondent received the Administrative Citation on October 19, 2013 therefore, this Petition is timely filed.
2. Respondent admits only that he is an owner of the property identified in the Administrative Citation. Respondent denies that the property is a “facility.” Respondent denies that he is an “operator” of a facility.
3. Respondent denies the allegations of violation in the Administrative Citation.

WHEREFORE, for the above reasons, Respondent respectfully requests that the Pollution Control Board enter an order dismissing the Administrative Citation and denying the civil penalties and other relief sought by Complainant.

Respectfully submitted,

ROGER E. RAY

By: /s/William D. Ingersoll
His Attorney

Dated: November 25, 2013

BROWN, HAY & STEPHENS, LLP

William D. Ingersoll

Registration No. 6186363

205 S. Fifth Street, Suite 700

P.O. Box 2459

Springfield, IL 62705-2459

(217) 544-8491

wingersoll@bhslaw.com

CERTIFICATE OF SERVICE

I, William D. Ingersoll, certify that I have this date served the attached Notice of Filing, Appearance, and Petition for Review of Administrative Citation by means described below, upon the following persons:

To: Pollution Control Board, Attn: Clerk
100 West Randolph Street
James R. Thompson Center, Suite 11-500
Chicago, Illinois 60601-3218
(Via Electronic Filing)

Michelle M. Ryan
Division of Legal Counsel
Illinois Environmental Protection Agency
1021 North Grand Avenue, East
P.O. Box 19276
Springfield, Illinois 62794-9276
(Via First-Class Mail and Email)

Dated: November 25, 2013

BROWN, HAY & STEPHENS, LLP

William D. Ingersoll
Registration No. 6186363
wingersoll@bhslaw.com
205 S. Fifth Street, Suite 700
P.O. Box 2459
Springfield, IL 62705-2459
(217) 544-8491

By: /s/William D. Ingersoll
William D. Ingersoll