

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

ILLINOIS ENVIRONMENTAL)	
PROTECTION AGENCY,)	
)	
Complainant,)	AC 14-37
)	
v.)	(IEPA No. 41-14-AC)
)	
GERALD CAIN and REYNOLDS)	
SERVICE CO., INC.,)	
)	
Respondents.)	

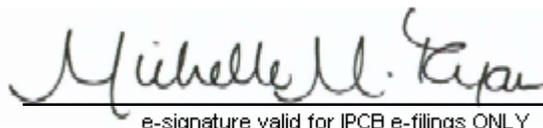
NOTICE OF FILING

To: Allen W. James, Esq.
137 W. Vienna Street
Suite 1A
Anna, IL 62906

Gerald Cain
127 Turner Avenue
Anna, IL 62906

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 AS TO RESPONDENT REYNOLDS SERVICE CO., INC.

Respectfully Submitted,



e-signature valid for IPCB e-filings ONLY

Michelle M. Ryan
Assistant Counsel

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

Dated: March 26, 2014

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

ILLINOIS ENVIRONMENTAL)	
PROTECTION AGENCY,)	
)	
Complainant,)	AC 14-37
)	
v.)	(IEPA No. 41-14-AC)
)	
GERALD CAIN and REYNOLDS)	
SERVICE CO., INC.,)	
)	
Respondents.)	

COMPLAINANT'S MOTION TO WITHDRAW ADMINISTRATIVE CITATION AS TO RESPONDENT
REYNOLDS SERVICE CO., INC.

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 February 11, 2014 , Illinois EPA issued an Administrative Citation to Respondents, Gerald Cain and Reynolds Service Co., Inc., based on an inspection conducted on January 3, 2014.

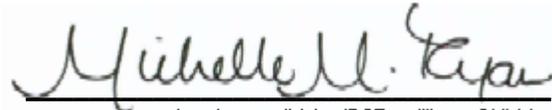
(2) On March 24, 2014, Respondent Reynolds Service Co., Inc., filed a timely petition for review contesting this Administrative Citation.

(3) Based upon facts and circumstances discovered since the filing of the Administrative Citation, Illinois EPA has determined that it is prudent to withdraw this Administrative Citation as to and Reynolds Service Co., Inc. at this time.

WHEREFORE, the Illinois Environmental Protection Agency requests that the Board dismiss the pending action against Respondent Reynolds Service Co., Inc.

ILLINOIS ENVIRONMENTAL
PROTECTION AGENCY,
Complainant

DATED: March 26, 2014



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Michelle M. Ryan
Assistant Counsel

Illinois Environmental Protection Agency
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Springfield, Illinois 62794-9276
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PROOF OF SERVICE

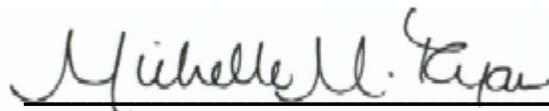
I hereby certify that I did on the 26th day of March, 2014, send by U.S. Mail with postage thereon fully prepaid, by depositing in a United States Post Office Box a true and correct copy of the following instrument(s) entitled MOTION TO WITHDRAW ADMINISTRATIVE CITATION AS TO RESPONDENT REYNOLDS SERVICE CO., INC.

To: Allen W. James, Esq.
137 W. Vienna Street
Suite 1A
Anna, IL 62906

Gerald Cain
127 Turner Avenue
Anna, IL 62906

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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P.O. Box 19276
Springfield, Illinois 62794-9276
(217) 782-5544