

**BEFORE THE ILLINOIS POLLUTION CONTROL BOARD**

PEOPLE OF THE STATE OF ILLINOIS,	)	
	)	
Complainant,	)	
	)	
-vs-	)	PCB No. 19-
	)	(Enforcement - Air)
BYRD'S CLEANERS AND LAUNDRY, INC.,	)	
an Illinois corporation,	)	
	)	
Respondent.	)	

**NOTICE OF FILING**

TO: See attached service list (VIA ELECTRONIC FILING)

PLEASE TAKE NOTICE that I have today filed with the Office of the Clerk of the Illinois Pollution Control Board by electronic filing the following Complaint, a copy of which is attached and hereby served upon you. You may be required to answer the charges of the Complaint at a hearing before the Board, at a date set by the Board.

Failure to file an answer to this complaint within 60 days may have severe consequences. Failure to answer will mean that all allegations in the complaint will be taken as if admitted for purposes of this proceeding. If you have any questions about this procedure, you should contact the hearing officer assigned to this proceeding, the clerk's office, or an attorney.

NOTIFICATION - YOU ARE HEREBY NOTIFIED that financing may be available through the Illinois Environmental Facilities Financing Act [20 ILCS 3515/1, et seq.] to correct the alleged violations.

Respectfully submitted,

PEOPLE OF THE STATE OF ILLINOIS,  
KWAME RAOUL, Attorney General of the  
State of Illinois

By: s/Raymond Callery  
Raymond Callery  
Assistant Attorney General  
Environmental Bureau  
Illinois Attorney General's Office  
500 S. Second Street  
Springfield, IL 62701  
(217)782-9031  
[rcallery@atg.state.il.us](mailto:rcallery@atg.state.il.us)  
[ebs@atg.state.il.us](mailto:ebs@atg.state.il.us)

Date: April 3, 2019

**Service List**

For the Respondent

Ronald D. Woods  
Byrd's Cleaners & Laundry, Inc.  
41 W. Coolidge Ave.  
Charleston, IL 61920

**BEFORE THE ILLINOIS POLLUTION CONTROL BOARD**

**PEOPLE OF THE STATE OF ILLINOIS,** )  
**by KWAME RAOUL, Attorney General** )  
**of the State of Illinois,** )  
) )  
**Complainant,** )  
) )  
**v.** )  
) )  
**BYRD'S CLEANERS AND LAUNDRY, INC.,** )  
**an Illinois corporation,** )  
) )  
**Respondent.** )

**PCB No. 2019-  
(Enforcement-Air)**

**COMPLAINT**

Complainant, PEOPLE OF THE STATE OF ILLINOIS, by KWAME RAOUL, Attorney General of the State of Illinois, on his own motion and at the request of the Illinois Environmental Protection Agency, complains of the Respondent, BYRD'S CLEANERS AND LAUNDRY, INC., an Illinois corporation, as follows:

**COUNT I**  
**FAILURE TO SUBMIT ANNUAL EMISSIONS REPORT**

1. This Complaint is brought on behalf of the People of the State of Illinois, by Kwame Raoul, Attorney General of the State of Illinois, on his own motion and at the request of the Illinois Environmental Protection Agency ("Illinois EPA"), pursuant to the terms and provisions of Section 31 of the Illinois Environmental Protection Act ("Act"), 415 ILCS 5/31 (2016).
2. The Illinois EPA is an administrative agency of the State of Illinois, created pursuant to Section 4 of the Act, 415 ILCS 5/4 (2016), and is charged, *inter alia*, with the duty of enforcing the Act.

3. Respondent, BYRD'S CLEANERS AND LAUNDRY, INC., is an Illinois corporation in good standing and authorized to do business in the State of Illinois by the Illinois Secretary of State.

4. At all times relevant to this Complaint, Respondent is and was the operator of a petroleum dry cleaning facility located at 41 W. Coolidge Avenue, Charleston, Coles County, Illinois ("Facility").

5. The Facility currently consists of the following emission source: one petroleum dry cleaning machine.

6. The emission source at the Facility is capable of emitting volatile organic material ("VOM").

7. Section 9(a) of the Act, 415 ILCS 5/9(a) (2016), provides as follows:

No person shall:

- (a) Cause or threaten or allow the discharge or emission of any contaminant into the environment in any State so as to cause or tend to cause air pollution in Illinois, either alone or in combination with contaminants from other sources, or so as to violate regulations or standards adopted by the Board under this Act.

8. Section 3.315 of the Act, 415 ILCS 5/3.315 (2016), provides the following definition:

"Person" means any individual, partnership, co-partnership, firm, company, limited liability company, corporation, association, joint stock company, trust, estate, political subdivision, state agency, or any other legal entity, or their legal representative, agent or assigns.

9. Respondent, a corporation, is a "person" as that term is defined in Section 3.315 of the Act, 415 ILCS 5/3.315 (2016).

10. Section 3.115 of the Act, 415 ILCS 5/3.115 (2016), provides the following definition:

“Air pollution” is the presence in the atmosphere of one or more contaminants in sufficient quantities and of such characteristics and duration as to be injurious to human, plant, or animal life, to health, or to property, or to unreasonably interfere with the enjoyment of life or property.

11. Section 3.165 of the Act, 415 ILCS 5/3.165 (2016), provides the following definition:

“Contaminant” is any solid, liquid, or gaseous matter, any odor, or any form of energy, from whatever source.

12. VOM is a “contaminant” as that term is defined under Section 3.165 of the Act, 415 ILCS 5/3.165 (2016).

13. Because the equipment described in paragraph 5, above, emits, emitted, and/or is capable of emitting VOM to the atmosphere, the aforementioned equipment is capable of causing or contributing to air pollution.

14. On June 18, 2002, Respondent was issued Lifetime Operating Permit No. 02050039 by the Illinois EPA for the emission unit at the Facility.

15. Section 201.302(a) of the Illinois Pollution Control Board’s (“Board”) Air Pollution Regulations, 35 Ill. Adm. Code 201.302(a), provides as follows:

- a) The owner or operator of any emission unit or air pollution control equipment meeting the applicability criteria contained in 35 Ill. Adm. Code 254.102 shall submit to the Agency as a minimum, annual reports detailing the nature, specific emission units and total annual quantities of all specified air contaminant emissions; provided, however, that the Agency may require more frequent reports when necessary to accomplish the purposes of the Act and this Chapter.

16. Section 254.102(b) of the Illinois EPA's Air Pollution Regulations, 35 Ill. Adm.

Code 254.102(b), provides as follows:

- b) Subpart C of this Part applies to the owner or operator of any source of regulated air pollutants required to have an operating permit in accordance with 35 Ill. Adm. Code 201 that is not subject to subsection (a) of this Section.

17. Section 254.132(a) of the Illinois EPA's Air Pollution Regulations, 35 Ill. Adm.

Code 254.132(a), provides as follows:

- a) Failure to file a complete Annual Emissions Report by the applicable deadlines prescribed in Section 254.137(a) of this Subpart shall be a violation of this Part and 35 Ill. Adm. Code 201.302(a).

18. Section 254.137(a) of the Illinois EPA's Air Pollution Regulations, 35 Ill. Adm.

Code 254.137(a), provides as follows:

- a) All Annual Emissions Reports are due by May 1 of the year following the calendar year in which the emissions took place.

19. Section 211.4370 of the Board's Air Pollution Regulations, 35 Ill. Adm. Code

211.4370, provides the following definition:

"Owner or operator" means any person who owns, operates, leases, controls, or supervises a source, an emission unit or air pollution control equipment.

20. Section 211.5500(b) of the Board's Air Pollution Regulations, 35 Ill. Adm. Code

211.5500(b), provides the following definition:

- b) "Regulated air pollutant" shall, for the purposes of 35 Ill. Adm. Code 201.180(a), mean any air contaminant as to which this Subtitle contains emission standards or other specific limitations and any contaminant regulated in Illinois pursuant to Section 9.1 of the Act.

21. Section 211.1950 of the Board's Air Pollution Regulations, 35 Ill. Adm. Code 211.1950, provides the following definition:

"Emission unit" means any part or activity at a stationary source that emits or has the potential to emit any air pollutant.

22. VOM is a regulated air pollutant as that term is defined in Section 211.5500 of the Board's Air Pollution Regulations, 35 Ill. Adm. Code 211.5500.

23. Respondent is an "owner or operator," as that term is defined in Section 211.4370 of the Board's Air Pollution Regulations, 35 Ill. Adm. Code 211.4370, of the emission unit at the Facility and, therefore, was required to submit an Annual Emissions Report ("AER") to the Illinois EPA, by May 1 of the following calendar year in which the emissions took place pursuant to Section 254.137(a) of the Illinois EPA's Air Pollution Regulations, 35 Ill. Adm. Code 254.137(a).

24. On June 25, 2014, the Illinois EPA issued Violation Notice ("VN") A-2014-00083 to Respondent for failure to timely submit an AER for calendar year 2013. Respondent subsequently submitted the 2013 AER and no further enforcement action was taken.

25. On June 14, 2017, the Illinois EPA issued VN A-2017-00041 to Respondent for failure to timely submit an AER for calendar year 2016. On September 6, 2017, the Illinois EPA entered into a Compliance Commitment Agreement with Respondent to resolve VN A-2017-00041.

26. On July 9, 2018, the Illinois EPA issued VN A-2018-00070 to Respondent for failure to timely submit an AER for calendar year 2017.

27. On August 24, 2018, Respondent responded to the most recent VN by submitting an AER for calendar year 2017. This AER was submitted to Illinois EPA approximately 115 days late.

28. By failing to submit an AER for the Facility for the year 2017 to the Illinois EPA by May 1, 2018, Respondent violated Section 201.302(a) of the Board's Air Pollution Regulations, 35 Ill. Adm. Code 201.302(a), and Section 254.132(a) of the Illinois EPA's Air Pollution Regulations, 35 Ill. Adm. Code 254.132(a).

29. By failing to submit to the Illinois EPA an AER for calendar year 2017 by May 1, 2018, in violation of Board and Illinois EPA regulations, Respondent thereby violated Section 9(a) of the Act, 415 ILCS 5/9(a) (2016).

**PRAYER FOR RELIEF**

WHEREFORE, Complainant, PEOPLE OF THE STATE OF ILLINOIS, respectfully requests that the Board enter an order in favor of the Complainant and against the Respondent, BYRD'S CLEANERS AND LAUNDRY, INC., for the following relief:

A. Authorizing a hearing in this matter at which time the Respondent will be required to answer the allegations herein;

B. Finding that the Respondent has violated Section 9(a) of the Act, 415 ILCS 5/9(a) (2016), Section 201.302(a) of the Board's Air Pollution Regulations, 35 Ill. Adm. Code 201.302(a), and Section 254.132(a) of the Illinois EPA Air Pollution Regulations, 35 Ill. Adm. Code 254.132(a);

C. Ordering the Respondent to cease and desist from any further violations of Section 9(a) of the Act, 415 ILCS 5/9(a) (2016), Section 201.302(a) of the Board's Air Pollution Regulations, 35 Ill. Adm. Code 201.302(a), and Section 254.132(a) of the Illinois EPA Air Pollution Regulations, 35 Ill. Adm. Code 254.132(a);

D. Pursuant to Section 42(a) of the Act, 415 ILCS 5/42(a) (2016), assessing against the Respondent a civil penalty of \$50,000.00 for each violation of the Act, and an additional civil



penalty of \$10,000.00 for each day the violations continued;

E. Ordering the Defendant to pay all costs, including expert witness, consultant and attorney fees, expended by the State in pursuit of this action; and

F. Ordering such other and further relief as the Board deems appropriate and just.

Respectfully submitted,

PEOPLE OF THE STATE OF ILLINOIS,  
by KWAME RAOUL, Attorney General  
of the State of Illinois

MATTHEW J. DUNN, Chief  
Environmental Enforcement/Asbestos  
Litigation Division

BY:



ANDREW B. ARMSTRONG, Chief  
Environmental Bureau  
Assistant Attorney General

Of Counsel  
RAYMOND J. CALLERY  
Assistant Attorney General  
Environmental Bureau  
Illinois Attorney General's Office  
500 South Second Street  
Springfield, Illinois 62706  
(217) 782-9035  
[rcallery@atg.state.il.us](mailto:rcallery@atg.state.il.us)  
[ebs@atg.state.il.us](mailto:ebs@atg.state.il.us)

**BEFORE THE ILLINOIS POLLUTION CONTROL BOARD**

<b>PEOPLE OF THE STATE OF ILLINOIS,</b>	)	
<b>by KWAME RAOUL, Attorney General</b>	)	
<b>of the State of Illinois,</b>	)	
	)	
<b>Complainant,</b>	)	
	)	
<b>v.</b>	)	<b>PCB No. 2019-</b>
	)	<b>(Enforcement - Air)</b>
<b>BYRD'S CLEANERS AND LAUNDRY, INC.,</b>	)	
<b>an Illinois corporation,</b>	)	
	)	
<b>Respondent.</b>	)	

**STIPULATION AND PROPOSAL FOR SETTLEMENT**

Complainant, PEOPLE OF THE STATE OF ILLINOIS, by KWAME RAOUL, Attorney General of the State of Illinois, the Illinois Environmental Protection Agency ("Illinois EPA"), and BYRD'S CLEANERS AND LAUNDRY, INC., an Illinois corporation ("Respondent") ("Parties to the Stipulation"), have agreed to the making of this Stipulation and Proposal for Settlement ("Stipulation") and submit it to the Illinois Pollution Control Board ("Board") for approval. This stipulation of facts is made and agreed upon for purposes of settlement only and as a factual basis for the Board's approval of this Stipulation and issuance of relief. None of the facts stipulated herein shall be introduced into evidence in any other proceeding regarding the violations of the Illinois Environmental Protection Act ("Act"), 415 ILCS 5/1 *et seq.* (2016), and the Board's Regulations, alleged in the Complaint except as otherwise provided herein. It is the intent of the Parties to the Stipulation that it be a final adjudication of this matter.

## I. STATEMENT OF FACTS

### A. Parties

1. On April 1, 2019, a Complaint was filed on behalf of the People of the State of Illinois by Kwame Raoul, Attorney General of the State of Illinois, on his own motion and upon the request of the Illinois EPA, pursuant to Section 31 of the Act, 415 ILCS 5/31 (2016), against the Respondent.

2. The Illinois EPA is an administrative agency of the State of Illinois, created pursuant to Section 4 of the Act, 415 ILCS 5/4 (2016).

3. Byrd's Cleaners and Laundry, Inc. ("Respondent"), is an Illinois corporation in good standing that is and was the owner and operator of a petroleum dry cleaning facility located at 41 W. Coolidge Avenue, Charleston, Coles County, Illinois (the "Facility").

4. The Facility operates one emission source, a petroleum dry cleaning machine.

5. The emission source at the Facility is capable of emitting volatile organic material ("VOM").

6. The owner or operator of each emission source must submit Annual Emissions Reports. All Annual Emission Reports are due by May 1 of the year following the calendar year in which the emissions took place.

### B. Allegations of Non-Compliance

Complainant contends that the Respondent has violated the following provisions of the Act and Board regulations:

Count I:        Failure to Submit Annual Emissions Report  
                  415 ILCS 5/9(a) (2016)  
                  35 Ill. Adm. Code 201.302(a)  
                  35 Ill. Adm. Code 254.132(a)

**C.     Non-Admission of Violations**

Respondent represents that it has entered into this Stipulation for the purpose of settling and compromising disputed claims without having to incur the expense of contested litigation. By entering into this Stipulation and complying with its terms, Respondent does not affirmatively admit the allegations of violation within the Complaint and referenced within Section I.B herein, and this Stipulation shall not be interpreted as including such admission.

**D.     Compliance Activities**

On August 24, 2018, Respondent submitted to Illinois EPA its Annual Emissions Report for calendar year 2017.

**II. APPLICABILITY**

This Stipulation shall apply to and be binding upon the Parties to the Stipulation. Respondent shall not raise as a defense to any enforcement action taken pursuant to this Stipulation the failure of any of its officers, directors, agents, employees or successors or assigns to take such action as shall be required to comply with the provisions of this Stipulation. This Stipulation may be used against Respondent in any subsequent enforcement action or permit proceeding as proof of a past adjudication of violation of the Act and the Board Regulations for all violations alleged in the Complaint in this matter, for purposes of Sections 39 and 42 of the Act, 415 ILCS 5/39 and 42 (2016).

### III. IMPACT ON THE PUBLIC RESULTING FROM ALLEGED NON-COMPLIANCE

Section 33(c) of the Act, 415 ILCS 5/33(c) (2016), provides as follows:

In making its orders and determinations, the Board shall take into consideration all the facts and circumstances bearing upon the reasonableness of the emissions, discharges, or deposits involved including, but not limited to:

1. the character and degree of injury to, or interference with the protection of the health, general welfare and physical property of the people;
2. the social and economic value of the pollution source;
3. the suitability or unsuitability of the pollution source to the area in which it is located, including the question of priority of location in the area involved;
4. the technical practicability and economic reasonableness of reducing or eliminating the emissions, discharges or deposits resulting from such pollution source; and
5. any subsequent compliance.

In response to these factors, the Parties to the Stipulation state the following:

1. Respondent submitted its Annual Emissions Report for calendar year 2017 approximately 115 days late. The requirement of submitting timely Annual Emissions Reports is of significant importance to Illinois EPA's air program.
2. There is social and economic benefit in the operation of Respondent's dry cleaning and laundry facility.
3. Respondent's dry cleaning and laundry facility was suitable for the area in which it was being operating.
4. Submitting Annual Emissions Reports in a timely manner was both technically practicable and economically reasonable.
5. Respondent has subsequently resolved the allegations in the Complaint.

#### IV. CONSIDERATION OF SECTION 42(h) FACTORS

Section 42(h) of the Act, 415 ILCS 5/42(h) (2016), provides as follows:

In determining the appropriate civil penalty to be imposed under . . . this Section, the Board is authorized to consider any matters of record in mitigation or aggravation of penalty, including but not limited to the following factors:

1. the duration and gravity of the violation;
2. the presence or absence of due diligence on the part of the respondent in attempting to comply with requirements of this Act and regulations thereunder or to secure relief therefrom as provided by this Act;
3. any economic benefits accrued by the respondent because of delay in compliance with requirements, in which case the economic benefits shall be determined by the lowest cost alternative for achieving compliance;
4. the amount of monetary penalty which will serve to deter further violations by the respondent and to otherwise aid in enhancing voluntary compliance with this Act by the respondent and other persons similarly subject to the Act;
5. the number, proximity in time, and gravity of previously adjudicated violations of this Act by the respondent;
6. whether the respondent voluntarily self-disclosed, in accordance with subsection i of this Section, the non-compliance to the Agency;
7. whether the respondent has agreed to undertake a "supplemental environmental project," which means an environmentally beneficial project that a respondent agrees to undertake in settlement of an enforcement action brought under this Act, but which the respondent is not otherwise legally required to perform; and
8. whether the respondent has successfully completed a Compliance Commitment Agreement under subsection (a) of Section 31 of this Act to remedy the violations that are the subject of the complaint.

In response to these factors, the Parties to the Stipulation state as follows:

1. Respondent submitted its Annual Emissions Report for calendar year 2017 approximately 115 days late. The requirement of submitting timely Annual Emissions Reports is

of significant importance to Illinois EPA's air program.

2. Respondent did not submit the Annual Emissions Report for calendar year 2017 until after receiving a Violation Notice from Illinois EPA.

3. No calculable economic benefit has been derived from the failure to timely submit the Annual Emissions Report for calendar year 2017.

4. Complainant has determined, based upon the specific facts of this matter, that a penalty of Five Thousand Dollars (\$5,000.00) will serve to deter further violations and aid in future voluntary compliance with the Act and Board regulations.

5. To Complainant's knowledge, Respondent has no previously adjudicated violations of the Act.

6. Self-disclosure is not at issue in this matter.

7. The settlement of this matter does not include a supplemental environmental project.

8. A Compliance Commitment Agreement was not at issue in this matter.

## V. TERMS OF SETTLEMENT

### A. Penalty Payment

Respondent shall pay a civil penalty in the sum of Five Thousand Dollars (\$5,000.00) within thirty (30) calendar days from the date the Board adopts and accepts this Stipulation.

### B. Interest and Default

1. If Respondent fails to make any payment required by this Stipulation on or before the date upon which the payment is due, Respondent shall be in default and the remaining unpaid

balance of the penalty, plus any accrued interest, shall be due and owing immediately. In the event of default, Complainant shall be entitled to reasonable costs of collection, including reasonable attorney's fees.

2. Pursuant to Section 42(g) of the Act, interest shall accrue on any penalty amount owed by Respondent not paid within the time prescribed herein. Interest on unpaid penalties shall begin to accrue from the date such are due and continue to accrue to the date full payment is received. Where partial payment is made on any penalty amount that is due, such partial payment shall be first applied to any interest on unpaid penalties then owing.

**C. Payment Procedures**

All payments required by this Stipulation shall be made by certified check or money order payable to the Illinois EPA for deposit into the Environmental Protection Trust Fund ("EPTF"). Payments shall be sent by first class mail and delivered to:

Illinois Environmental Protection Agency  
Fiscal Services  
1021 North Grand Avenue East  
P.O. Box 19276  
Springfield, IL 62794-9276

The name and case number shall appear on the face of the certified check or money order. A copy of the certified check or money order and any transmittal letter shall be sent to:

Raymond J. Callery  
Assistant Attorney General  
Environmental Bureau  
Illinois Attorney General's Office  
500 South Second Street  
Springfield, Illinois 62706



**D. Future Compliance**

1. This Stipulation in no way affects the responsibilities of Respondent to comply with any other federal, state or local laws or regulations, including but not limited to the Act and the Board Regulations.

2. Respondent shall cease and desist from future violations of the Act and Board Regulations that were the subject matter of the Complaint.

**E. Release from Liability**

In consideration of Respondent's payment of the \$5,000.00 penalty, its commitment to cease and desist as contained in Section V.D.2 above, and upon the Board's approval of this Stipulation, Complainant releases, waives and discharges Respondent from any further liability or penalties for the violations of the Act and Board Regulations that were the subject matter of the Complaint herein. The release set forth above does not extend to any matters other than those expressly specified in Complainant's Complaint filed on April 1, 2019. Complainant reserves, and this Stipulation is without prejudice to, all rights of the State of Illinois against Respondent with respect to all other matters, including but not limited to, the following:

- a. criminal liability;
- b. liability for future violation of state, federal, local, and common laws and/or regulations;
- c. liability for natural resources damage arising out of the alleged violations; and
- d. liability or claims based on the Respondent's failure to satisfy the requirements of this Stipulation.

Nothing in this Stipulation is intended as a waiver, discharge, release, or covenant not to sue for any claim or cause of action, administrative or judicial, civil or criminal, past or future, in law or in equity, which the State of Illinois may have against any person, as defined by Section 3.315 of the Act, 415 ILCS 5/3.315, or entity other than the Respondent.

**F. Enforcement**

Upon the entry of the Board's Order approving and accepting this Stipulation, that Order is a binding and enforceable order of the Board and may be enforced as such through any and all available means.

**G. Execution of Stipulation**

The undersigned representatives for the Parties to the Stipulation certify that they are fully authorized by the party whom they represent to enter into the terms and conditions of this Stipulation and to legally bind them to it.

REMAINDER OF PAGE LEFT INTENTIONALLY BLANK

WHEREFORE, the Parties to the Stipulation request that the Board adopt and accept the foregoing Stipulation and Proposal for Settlement as written.

PEOPLE OF THE STATE OF ILLINOIS,

KWAME RAOUL  
Attorney General  
of the State of Illinois

MATTHEW J. DUNN, Chief  
Environmental Enforcement/  
Asbestos Litigation Division

BY: \_\_\_\_\_  
ANDREW ARMSTRONG, Chief  
Environmental Bureau  
Assistant Attorney General

DATE: \_\_\_\_\_

ILLINOIS ENVIRONMENTAL  
PROTECTION AGENCY

JOHN J. KIM, Acting Director  
Illinois Environmental Protection Agency

BY: \_\_\_\_\_  
DANA VETTERHOFFER  
Acting Chief Legal Counsel

DATE: \_\_\_\_\_

BYRD'S CLEANERS AND  
LAUNDRY, INC.,

BY: Ronald D Woods  
RONALD D. WOODS, President

DATE: 3/13/19

WHEREFORE, the Parties to the Stipulation request that the Board adopt and accept the foregoing Stipulation and Proposal for Settlement as written.

PEOPLE OF THE STATE OF ILLINOIS,

KWAME RAOUL  
Attorney General  
of the State of Illinois

MATTHEW J. DUNN, Chief  
Environmental Enforcement/  
Asbestos Litigation Division

BY: Andrew Armstrong  
ANDREW ARMSTRONG, Chief  
Environmental Bureau  
Assistant Attorney General

DATE: 03/26/2019

ILLINOIS ENVIRONMENTAL  
PROTECTION AGENCY

JOHN J. KIM, Acting Director  
Illinois Environmental Protection Agency

BY: Dana Vetterhoffer  
DANA VETTERHOFFER  
Acting Chief Legal Counsel

DATE: 3-22-19

BYRD'S CLEANERS AND  
LAUNDRY, INC.,

BY: \_\_\_\_\_  
RONALD D. WOODS, President

DATE: \_\_\_\_\_



WHEREFORE, Complainant, PEOPLE OF THE STATE OF ILLINOIS, hereby requests that the Board grant this motion for relief from the hearing requirement set forth in Section 31(c)(1) of the Act, 415 ILCS 5/31(c)(1) (2012).

Respectfully submitted,

PEOPLE OF THE STATE OF ILLINOIS, *ex rel.*, KWAME RAOUL, ATTORNEY GENERAL

MATTHEW J. DUNN, Chief  
Environmental Enforcement/Asbestos  
Litigation Division

BY: s/Raymond J. Callery

RAYMOND J. CALLERY  
Environmental Bureau  
Assistant Attorney General  
500 South Second Street  
Springfield, Illinois 62701  
(217)782-9031

Dated: April 3, 2019.

**CERTIFICATE OF SERVICE**

I, Raymond Callery, an Assistant Attorney General, certify that on the 3rd day of April, 2019, I caused to be served by Regular U.S. Mail the foregoing Notice of Filing, Complaint, Stipulation and Proposal for Settlement and Motion for Relief from Hearing Requirements to the party named herein, by depositing same in postage prepaid envelopes with the United States Postal Service, Springfield, IL.

Ronald D. Woods  
Byrd's Cleaners & Laundry, Inc.  
41 W. Coolidge Ave.  
Charleston, IL 61920

s/Raymond Callery  
Raymond Callery  
Assistant Attorney General  
Environmental Bureau  
Illinois Attorney General's Office  
500 South Second Street  
Springfield, IL 62701  
(217)782-9031  
[rcallery@atg.state.il.us](mailto:rcallery@atg.state.il.us)  
[ebs@atg.state.il.us](mailto:ebs@atg.state.il.us)