### **BEFORE THE ILLINOIS POLLUTION CONTROL BOARD**

PEOPLE OF THE STATE OF ILLINOIS, by KWAME RAOUL, Attorney General of the State of Illinois,	
Complainant,	
V.	) PCB No. 2020-016 ) (Enforcement)
IRONHUSTLER EXCAVATING, INC., an Illinois corporation, RIVER CITY	)
CONSTRUCTION, LLC, an Illinois limited liability company, and VENOVICH	)
CONSTRUCTION CO., an Illinois corporation,	
Respondents.	)

# NOTICE OF FILING

TO: See attached service list

PLEASE TAKE NOTICE that I did on September 19, 2019, file with the Office of the Clerk of the Illinois Pollution Control Board by electronic filing the following Notice of Filing and Amended Certificate of Service, copies of which are 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.

<u>Failure to file an answer to this complaint within 60 days may have severe</u> <u>consequences</u>. 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. <u>NOTIFICATION</u> - 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.

PEOPLE OF THE STATE OF ILLINOIS KWAME RAOUL, ATTORNEY GENERAL

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

BY: s/Raymond J. Callery

Raymond J. Callery, #6193579 Assistant Attorney General 500 South Second Street Springfield, Illinois 62701 217/782-9031 <u>rcallery@atg.state.il.us</u> <u>ebs@atg.state.il.us</u>

Dated: September 19, 2019

#### Service List

#### For the Respondents

Venovich Construction Company c/o Joseph L. Venovich, Jr., Registered Agent 207 South Sampton Street P.O. Box 410 Tremont, IL 61568

Kenneth Eathington Quinn Johnston Henderson & Pretorius 227 N.E. Jefferson Street Peoria, IL 61602 Via certified mail – return receipt requested

William Campbell Davis & Campbell L.L.C. 401 Main Street, Suite 1600 Peoria, IL 61602-1241 Via certified mail – return receipt requested

## AMENDED CERTIFICATE OF SERVICE

I, Raymond J. Callery, an Assistant Attorney General, certify that on the 19th day of

September, 2019, I caused to be served via certified mail, return receipt requested as indicated,

and by regular mail as indicated, a copy of the foregoing Notice of Filing, Amended Certificate of

Service and Complaint to the following:

Venovich Construction Company c/o Joseph L. Venovich, Jr., Registered Agent 207 South Sampton Street P.O. Box 410 Tremont, IL 61568 Via regular mail

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> s/Raymond J. Callery Raymond J. Callery Assistant Attorney General 500 South Second Street Springfield, IL 62701 217/782-9031 rcallery@atg.state.il.us ebs@atg.state.il.us