

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

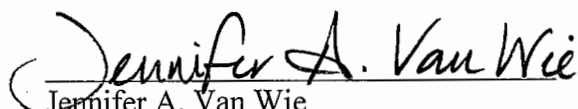
CLINTON LANDFILL, INC.,)	
)	
Petitioner,)	
)	
v.)	PCB 15-60
)	(Permit Appeal - Land)
ILLINOIS ENVIRONMENTAL)	
PROTECTION AGENCY,)	
)	
Respondent.)	

NOTICE OF ELECTRONIC FILING

PLEASE TAKE NOTICE that on the 3rd day of September 2014, I have filed with the Office of the Clerk of the Pollution Control Board the Appearances of Stephen Sylvester and Jennifer A. Van Wie on behalf of Respondent, Illinois Environmental Protection Agency, and a Notice of Intent to File a Response in Opposition to Petitioner's Motion to Stay. Copies of the documents are attached hereto and served upon the persons listed in the attached Service List.

ILLINOIS ENVIRONMENTAL
PROTECTION AGENCY

By LISA MADIGAN
Attorney General of the
State of Illinois


Jennifer A. Van Wie
Assistant Attorney General
Environmental Bureau
69 W. Washington Street, Suite 1800
Chicago Illinois, 60602
(312)814-0609
jvanwie@atg.state.il.us

Date: September 3, 2014

SERVICE LIST

For Petitioner:

Brian J. Meginnnes
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Elias, Meginnnes, Riffle & Seghetti, P.C.
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Peoria, Illinois 61602-1153
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For Respondent:

James Jennings
Division of Legal Counsel
Illinois Environmental Protection Agency
1021 North Grand Avenue East
P.O. Box 19276
Springfield, Illinois 62794-9276
(by electronic mail)

For the Illinois Pollution Control Board:

Mr. John Therriault
Assistant Clerk
Illinois Pollution Control Board
100 W. Randolph
Chicago, Illinois 60601
(by electronic filing)

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

CLINTON LANDFILL, INC.,)	
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ILLINOIS ENVIRONMENTAL)	
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)	
Respondent.)	

APPEARANCE

I hereby enter my appearance in this matter as lead counsel for Respondent, the Illinois Environmental Protection Agency.

Respectfully submitted,

ILLINOIS ENVIRONMENTAL
PROTECTION AGENCY

By:


Stephen J. Sylvester
Assistant Attorney General
Environmental Bureau
69 West Washington Street, Suite 1800
Chicago, Illinois 60602
(312) 814-2087
ssylvester@atg.state.il.us

Date: September 3, 2014

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CLINTON LANDFILL, INC.,)
)
 Petitioner,)
)
 v.)
)
 ILLINOIS ENVIRONMENTAL)
 PROTECTION AGENCY,)
)
 Respondent.)

PCB 15-60
 (Permit Appeal - Land)

APPEARANCE

I hereby enter my appearance in this matter as additional counsel for Respondent, the Illinois Environmental Protection Agency. Assistant Attorney General Stephen J. Sylvester is lead counsel for Respondent in this matter.

Respectfully submitted,

ILLINOIS ENVIRONMENTAL
 PROTECTION AGENCY

By: Jennifer A. Van Wie
 Jennifer A. Van Wie
 Assistant Attorney General
 Environmental Bureau
 69 West Washington Street, Suite 1800
 Chicago, Illinois 60602
 (312) 814-0609
 jvanwie@atg.state.il.us

Date: September 3, 2014

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PROTECTION AGENCY,)	
)	
Respondent.)	

**NOTICE OF INTENT TO FILE A RESPONSE
IN OPPOSITION TO PETITIONER'S MOTION TO STAY**

Now comes Respondent, ILLINOIS ENVIRONMENTAL PROTECTION AGENCY ("IEPA"), by LISA MADIGAN, Attorney General of the State of Illinois, and hereby gives notice of its intent to respond to Petitioner's, CLINTON LANDFILL, INC. ("CLI"), Motion to Stay. In support of this filing, the IEPA states as follows:

1. On August 28, 2014, CLI filed its Petition for Review of Permit ("Petition") and Motion for Order Regarding Stay ("Motion to Stay") with the Illinois Pollution Control Board ("Board").
2. On September 2, 2014, the IEPA received CLI's Petition and Motion to Stay.
3. On September 2, 2014, the Illinois Attorney General's Office received the IEPA's request for representation in the above-captioned matter.
4. Pursuant to Section 101.500(d) of the Board Procedural Rules, 35 Ill. Adm. Code 101.500(d), a party may file a response to a motion within 14 days after service of the motion. Therefore, Respondent's response to the Motion to Stay is due by September 16, 2014.
5. The Petition is on the Board's September 4, 2014 Meeting Agenda ("Agenda").

6. In its Petition and Motion, Petitioner suggests it is entitled to a stay by operation of law.


7. Although the Agenda does not indicate that the Motion to Stay is before the Board at this time, out of an abundance of caution, by this filing Respondent informs the Board and CLI that it intends to timely file its response to CLI's Motion to Stay by September 16, 2014.

WHEREFORE, Respondent, ILLINOIS ENVIRONMENTAL PROTECTION AGENCY, hereby requests that the Board take notice of Respondent's intent to file a response to Petitioner's Motion to Stay within the regulatory period provided to respond found in 35 Ill. Adm. Code 101.500(d).

Respectfully submitted,

ILLINOIS ENVIRONMENTAL
PROTECION AGENCY

By LISA MADIGAN
Attorney General of the State of Illinois

BY: 
Jennifer A. Van Wie
Stephen J. Sylvester
Assistant Attorneys General
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(312) 814-0609
(312) 814-2087
jvanwie@atg.state.il.us
ssylvester@atg.state.il.us

DATE: September 3, 2014

CERTIFICATE OF SERVICE

I, JENNIFER A. VAN WIE, an attorney, do certify that I caused the Appearances of Stephen Sylvester and Jennifer A. Van Wie and a Notice of Intent to File a Response in Opposition to Petitioner's Motion to Stay in this matter to be served upon the persons listed in the Service List by electronic mail and/or placing same in an envelope bearing sufficient postage with the United States Postal Service located at 100 W. Randolph, Chicago, Illinois.


JENNIFER A. VAN WIE

Date: September 3, 2014