

**BEFORE THE POLLUTION CONTROL BOARD  
OF THE STATE OF ILLINOIS**

PARKER'S GAS AND MORE, INC.,	)	
Petitioner,	)	
	)	
v.	)	PCB 2019-079
	)	(LUST Appeal)
ILLINOIS ENVIRONMENTAL	)	
PROTECTION AGENCY,	)	
Respondent.	)	

**NOTICE**

Don Brown, Clerk  
Illinois Pollution Control Board  
James R. Thompson Center  
100 West Randolph, Suite 11-500  
Chicago, IL 60601  
[don.brown@illinois.gov](mailto:don.brown@illinois.gov)

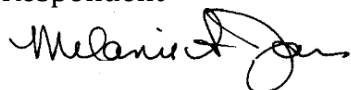
Carol Webb, Hearing Officer  
Illinois Pollution Control Board  
1021 North Grand Avenue East  
P.O. Box 19274  
Springfield, IL 62794-9274  
[carol.webb@illinois.gov](mailto:carol.webb@illinois.gov)

Patrick D. Shaw  
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**PLEASE TAKE NOTICE** that I have today filed with the office of the Clerk of the Pollution Control Board **ILLINOIS EPA'S RESPONSE TO PETITIONER'S OPPOSITION TO LEAVE TO REPLY**, copies of which are herewith served upon you.

Respectfully submitted,

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY,  
Respondent



Melanie A. Jarvis  
Assistant Counsel  
Division of Legal Counsel  
1021 North Grand Avenue, East  
P.O. Box 19276  
Springfield, Illinois 62794-9276  
217/782-5544  
217/782-9143 (TDD)  
Dated: July 12, 2021

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ILLINOIS ENVIRONMENTAL	)	
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**ILLINOIS EPA'S RESPONSE TO PETITIONER'S OPPOSITION TO LEAVE TO REPLY**

NOW COMES the Respondent, the Illinois Environmental Protection Agency ("Illinois EPA"), by one of its attorneys, Melanie A. Jarvis, Assistant Counsel, and, pursuant to 35 Ill. Adm. Code 101.500, hereby responds to Petitioner's opposition to Illinois EPA's Leave to Reply. The Illinois EPA states as follows:

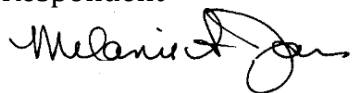
The Petitioner states that "the reargument merely attempts to obscure that there is not any actual supporting documentation lacking, certainly not the fictitious transaction concocted by the Agency."

The Illinois EPA takes great offense to this statement because the only "fictitious" transaction is the one being perpetrated against the State of Illinois by the Petitioner's consultant, Chase Environmental, by asking for reimbursement from a State Fund for something they received for **FREE**. The Petitioner's consultant has provided absolutely no supporting documentation to show that it deserves reimbursement from the Fund.

WHEREFORE, for the reasons stated above, the Illinois EPA hereby respectfully requests that the Board approve the Illinois EPA's leave to file a Reply and ultimately find in favor of the Illinois EPA on summary judgement.

Respectfully submitted,

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY,  
Respondent



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Dated: July 12, 2021

This filing submitted on recycled paper.

**CERTIFICATE OF SERVICE**

I, the undersigned attorney at law, hereby certify that on July 12, 2021, I served true and correct copies of **ILLINOIS EPA'S MOTION TO STRIKE** via the Board's COOL system and email, upon the following named persons:

Don Brown, Clerk  
Illinois Pollution Control Board  
James R. Thompson Center  
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