

RECEIVED
CLERK'S OFFICE

OCT 31 2003

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD
ADMINISTRATIVE CITATION

STATE OF ILLINOIS
Pollution Control Board

COUNTY OF VERMILION, ILLINOIS,

Complainant,

v.

VILLAGE OF TILTON,

Respondent.

AC No. 04-22

County File No. 03-03

JURISDICTION

This Administrative Citation is issued pursuant to the authority vested in the Illinois Environmental Protection Agency by sections 4(e) and 31.1 of the Illinois Environmental Protection Act ("Act"), 415 ILCS 5/4(e), 5/31.1, and delegated to Vermilion County pursuant to section 4(r) of the Act, 415 ILCS 5/4(r).

FACTS

1. Respondent, Village of Tilton, is, and was at all times relevant to this Administrative Citation, contracted as the operator of property located southeast of the intersection of 1st Avenue and 15th Street, recorded with the Supervisor of Assessments as DOR 0768 and DOR 0772, Tilton, County of Vermilion, State of Illinois.
2. Said property is operated as an unlicensed open dump, and designated with Illinois Environmental Protection Agency Site Code No. 1830905032.
3. On August 25, 2003, Douglas Toole of the Vermilion County Health Department inspected the above-described property. Douglas Toole's Affidavit and a copy of his inspection report are attached hereto and made a part hereof by reference.

VIOLATION

On the basis of the direct observation of Douglas Toole, the County of Vermilion has determined that on August 25, 2003, Respondent was conducting an unlicensed open dump at the above-described address, which is required to have a permit pursuant to 415 ILCS 5/21(a) of the Act, in a manner which resulted in the following conditions:

- A. Open dumping resulting in open burning was observed at the site, in violation of Section 21(p)(3) of the Act, 415 ILCS 5/21(p)(3), which provides no person shall...cause or allow the open dumping of any waste in a manner which results in ...open burning.

CIVIL PENALTY

Pursuant to section 42(b)(4-5) of the Act, 415 ILCS 5/42(b)(4-5), Respondent herein is subject to a civil penalty of One Thousand Five Hundred Dollars (\$1500.00) for the above-mentioned violation. Additionally, should Respondent elect to petition the Illinois Pollution Control Board under the review process described herein, and if there is a finding of the violation alleged herein after an adjudicatory hearing, Respondent shall be assessed the associated hearing costs incurred by the Illinois Pollution Control Board, in addition to the One Thousand Five Hundred Dollar (\$1500.00) statutory penalty for the violation.

PROCEDURE FOR CONTESTING THIS ADMINISTRATIVE CITATION

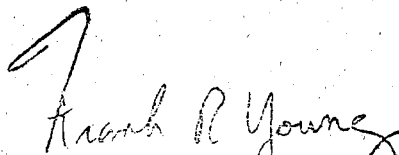
You have the right to contest this Administrative Citation under section 31.1(d) of the Act, 415 ILCS 5/31.1(d). If you elect to contest this Administrative Citation, you must file a Petition for Review with the Clerk of the Illinois Pollution Control Board, at the State of Illinois Center, 100 West Randolph Street, Suite 11-500, Chicago, Illinois 60601. Such Petition for Review must be filed within thirty-five (35) days of the date of service of this Administrative Citation, or a default judgment will be issued by the Illinois Pollution Control Board. A copy of the Petition for Review should be filed with the Vermilion County State's Attorney's Office, 7 North Vermilion Street, Danville, Illinois 61832.

If you acknowledge the violation cited herein, the civil penalty specified above shall be due and payable no later than November 21, 2003. If you do not petition the Illinois Pollution Control Board for review of this Administrative Citation within thirty-five (35) days of service hereof and have not paid the civil penalty by the due date stated above, or if you elect to contest this Administrative Citation, any judgment rendered shall specify the due date of the statutory civil penalty and any costs assessed against you.

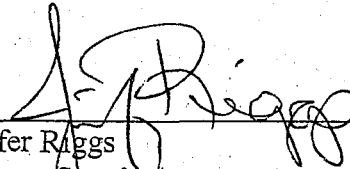
When payment is made, your check should be made payable to the County of Vermilion, Illinois, and mailed to the Vermilion County Health Department, 200 South College Street, Danville, Illinois 61832, together with a completed copy of the Remittance Form attached hereto.

If any civil penalty, by reason of acknowledgment, default or finding after adjudicatory hearing, is not paid when due, the Vermilion County State's Attorney may initiate proceedings in the Circuit Court to collect said civil penalty. In addition to the previously assessed civil penalty and any hearing costs of the Illinois Pollution Control Board, the State's Attorney's Office will seek to recover its costs of litigation.

Dated: 10/28/03



Frank R. Young
State's Attorney for Vermilion County



By: Jennifer Riggs
Assistant State's Attorney

Prepared by:
Jennifer Riggs
Office of the State's Attorney
7 N. Vermilion St.
Danville, IL 61832
217-554-7750

REMITTANCE FORM

IN THE MATTER OF

VILLAGE OF TILTON,

AC No. _____

County File No. 03-03

Respondent.

Facility/Property:

DOR 0768 and DOR 0772, Tilton, Illinois

County:

Vermilion

Date of Inspection:

August 25, 2003

Site Code No.:

1830905032

Civil Penalty:

\$1500.00

Date Remitted:

SSN/FEIN No.:

Signature:

NOTE

Please enter the date of your remittance, your Social Security Number (SSN) if an individual, or Federal Employer Identification Number (FEIN) if a business, and sign this Remittance Form. Your check should be made out to the County of Vermilion, Illinois. Be sure your check is enclosed with this Remittance Form and mail to: Vermilion County Health Department, 200 S. College Street, Danville, Illinois 61832.

RECEIVED
CLERK'S OFFICE

OCT 31 2003

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

STATE OF ILLINOIS
Pollution Control Board

AFFIDAVIT

IN THE MATTER OF
VILLAGE OF TILTON,

Respondent.

AC No. 04-22
County File No. 03-03

The Affiant, Douglas Toole, being first duly sworn, voluntarily deposes and states as follows:

1. Affiant is a field inspector employed by the Vermilion County Health Department and has been so employed at all times pertinent hereto.
2. On August 25, 2003, between 2:20 p.m. and 2:30 p.m., Affiant conducted an inspection of property located southeast of the intersection of 1st Avenue and 15th Street, recorded with the Supervisor of Assessments as DOR 0768 and DOR 0772, within the County of Vermilion, State of Illinois, operated by Village of Tilton.
3. Affiant inspected the property by an on-site inspection, which included walking on the site.
4. Prior to said inspection, Affiant had reviewed Illinois Environmental Protection Agency permits issued to the subject site.
5. As a result of the activities referred to in paragraphs 2, 3 and 4 above, Affiant completed the Solid Waste Landfill Inspection Checklist, with the accompanying Inspection Report Narrative, Site Sketch and photographs, attached hereto and made a part hereof, which, to the best of Affiant's knowledge and belief, is an accurate representation of Affiant's observations and factual conclusions with respect to the property located southeast of the intersection of 1st Avenue and 15th Street, recorded with the Supervisor of Assessments as DOR 0768 and DOR 0772, Tilton, Illinois, on August 25, 2003.

Douglas Toole

Douglas Toole

SIGNED and SWORN to before me this 23rd day of October, 2003, by Douglas Toole.



Barb Carter
NOTARY PUBLIC

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

IN THE MATTER OF)

VILLAGE OF TILTON,)

Respondent.)

AC No. _____

County File No. 03-03

AFFIDAVIT OF SERVICE ON CORPORATION

State of Illinois)

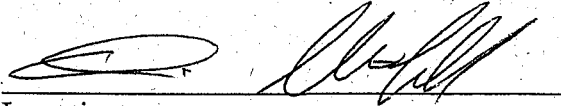
) ss

County of Vermilion)

I, the undersigned, on oath state that I have served the attached Administrative Citation on the Respondent, Village of Tilton, by leaving a copy of the same with (name):

David Phillips, at (address): 201 W. 5th at (time):

9:35 A.M., on (date): 10/24/03, 2003.


Investigator

Vermilion County State's Attorney Office

SUBSCRIBED AND SWORN TO BEFORE ME this 28th day of October, 2003.


NOTARY PUBLIC

THIS FILING IS SUBMITTED ON RECYCLED PAPER



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

Open Dump Inspection Checklist

County: VERMILION LPC#: 1830905032 Region: 4
 Location/Site Name: TILTON / BUTLER
 Date: 8/25/03 Time: From 2:20 P.M. To 2:30 P.M. Previous Inspection Date: _____
 Inspector(s): DOUGLAS TOOLE Weather: HAZY, DRY, 90°F
 No. of Photos Taken: # 12 Est. Amt. of Waste: 100 yds³ Samples Taken: Yes # _____ No ☒
 Interviewed: _____ Complaint #: _____

Responsible Party
 Mailing Address(es)
 and Phone
 Number(s):

MILDRED BUTLER
 1721 N. LOGAN AVENUE
 DANVILLE, IL 61832
 (217) 443-6777

VILLAGE OF TILTON
 201 W. 5TH STREET
 TILTON, IL 61833
 (217) 442-4178

	SECTION	DESCRIPTION	VIOL
ILLINOIS ENVIRONMENTAL PROTECTION ACT REQUIREMENTS			
1.	9(a)	CAUSE, THREATEN OR ALLOW AIR POLLUTION IN ILLINOIS	☒
2.	9(c)	CAUSE OR ALLOW OPEN BURNING	☒
3.	12(a)	CAUSE, THREATEN OR ALLOW WATER POLLUTION IN ILLINOIS	☐
4.	12(d)	CREATE A WATER POLLUTION HAZARD	☐
5.	21(a)	CAUSE OR ALLOW OPEN DUMPING	☒
6.	21(d)	CONDUCT ANY WASTE-STORAGE, WASTE-TREATMENT, OR WASTE- DISPOSAL OPERATION:	
	(1)	Without a Permit	☒
	(2)	In Violation of Any Regulations or Standards Adopted by the Board	☒
7.	21(e)	DISPOSE, TREAT, STORE, OR ABANDON ANY WASTE, OR TRANSPORT ANY WASTE INTO THE STATE AT/TO SITES NOT MEETING REQUIREMENTS OF ACT	☒
8.	21(p)	CAUSE OR ALLOW THE OPEN DUMPING OF ANY WASTE IN A MANNER WHICH RESULTS IN ANY OF THE FOLLOWING OCCURRENCES AT THE DUMP SITE:	
	(1)	Litter	☒
	(2)	Scavenging	☐
	(3)	Open Burning	☒
	(4)	Deposition of Waste in Standing or Flowing Waters	☐
	(5)	Proliferation of Disease Vectors	☐
	(6)	Standing or Flowing Liquid Discharge from the Dump Site	☐

LPC #1830905032

Inspection Date: 8/25/03

	(7)	Deposition of General Construction or Demolition Debris; or Clean Construction or Demolition Debris	☒
9.	55(a)	NO PERSON SHALL:	
	(1)	Cause or Allow Open Dumping of Any Used or Waste Tire	☒
	(2)	Cause or Allow Open Burning of Any Used or Waste Tire	☒
35 ILLINOIS ADMINISTRATIVE CODE REQUIREMENTS SUBTITLE G			
10.	812.101(a)	FAILURE TO SUBMIT AN APPLICATION FOR A PERMIT TO DEVELOP AND OPERATE A LANDFILL	☒
11.	722.111	HAZARDOUS WASTE DETERMINATION	☐
12.	808.121	SPECIAL WASTE DETERMINATION	☐
13.	809.302(a)	ACCEPTANCE OF SPECIAL WASTE FROM A WASTE TRANSPORTER WITHOUT A WASTE HAULING PERMIT, UNIFORM WASTE PROGRAM REGISTRATION AND PERMIT AND/OR MANIFEST	☐
OTHER REQUIREMENTS			
14.		APPARENT VIOLATION OF: (☐) PCB; (☐) CIRCUIT COURT CASE NUMBER: ORDER ENTERED ON:	☐
15.	OTHER:		☐
			☐
			☐
			☐
			☐
			☐

Douglas Toole

Signature of Inspector(s)

Informational Notes

1. [Illinois] Environmental Protection Act: 415 ILCS 5/4.
2. Illinois Pollution Control Board: 35 Ill. Adm. Code, Subtitle G.
3. Statutory and regulatory references herein are provided for convenience only and should not be construed as legal conclusions of the Agency or as limiting the Agency's statutory or regulatory powers. Requirements of some statutes and regulations cited are in summary format. Full text of requirements can be found in references listed in 1. and 2. above.
4. The provisions of subsection (p) of Section 21 of the [Illinois] Environmental Protection Act shall be enforceable either by administrative citation under Section 31.1 of the Act or by complaint under Section 31 of the Act.
5. This inspection was conducted in accordance with Sections 4(c) and 4(d) of the [Illinois] Environmental Protection Act: 415 ILCS 5/4(c) and (d).
6. Items marked with an "NE" were not evaluated at the time of this inspection.



PUBLIC HEALTH IS PRICELESS

VERMILION COUNTY HEALTH DEPARTMENT

STEPHEN LAKER, M.S.
PUBLIC HEALTH ADMINISTRATOR

HEALTH AND EDUCATION BUILDING
200 SOUTH COLLEGE, SUITE A
DANVILLE, IL 61832
PHONE/TDD 217 431-2662
FAX 217 431-7483

LPC #1830905032
Tilton/Butler
FOS
08/25/03

OPEN DUMP INSPECTION NARRATIVE

This unpermitted open dump was inspected on August 25, 2003, by Douglas Toole of the Vermilion County Health Department. The weather was hazy, dry and about 90 degrees Fahrenheit. Twelve photos were taken of the site.

The site is located in Vermilion County, southeast of the intersection of 1st Avenue and 15th Street in Tilton, Illinois. The site is the location of the former Skyway Haunted House, which has not been open in recent years.

INSPECTORS FINDINGS

By way of background, I initially received a complaint about waste tires on the west part of the property along 15th Street (photo 12) in June, 2003. I investigated the complaint and sent a letter to the owner, Mildred Butler, on June 26, 2003, notifying her that the conditions on the property violated Sections 3.3, 9.1 and 10.3 of the Vermilion County Health Department's Ordinance Governing Solid Waste Disposal, and ordering her to correct the violations by August 26, 2003. Ms. Butler called me on July 7, 2003 and said that the village of Tilton now owned the property. I called Dave Phillips, the mayor of Tilton, later that afternoon, and was told that the village had an option to purchase the property from Ms. Butler, and would look into having the house on the property burned as part of a firefighter training exercise and the refuse removed for her.

I arrived to recheck the site at 2:20 p.m. on August 25, 2003. No one was present on the site when I arrived. I first noticed that the dozen waste tires which had been piled on the west part of the property were gone, as was the reddish-brown truck trailer next to them (photo 12). I then observed a smoldering waste pile behind the haunted house (photo 11).



LPC #1830905032

Tilton/Butler

8/25/03

Page 2 of 4

Along the east end of 15th Street, I observed the haunted house, a brown mobile home and two truck trailers, all of which appeared to be damaged and deteriorating (photos 1-3). I then walked behind the haunted house to the smoldering waste pile (photo 4). In the pile I observed dirt, grass, branches, metal fencing, boards, three tire rims with tire belts around them, clay tile, scrap metal, demolition debris, concrete and other refuse (photos 5-10). Many of the items in the north and central part of the pile appeared to be partially burnt, and smoke was rising from the middle of the pile.

I left the site at about 2:30 p.m.

I called the Tilton Village Hall later that afternoon, and was told that village workers had burned some brush at the site. On the following day, August 26, 2003, I spoke with Mayor Phillips, who confirmed that village workers had done the cleanup and burned some brush and fencing at the site. He defended the workers' efforts in cleaning up the property, and then questioned the validity and legality of my inspection there.

On the Inspection Report Checklist for this reinspection, I estimated that there were 100 cubic yards of waste on the site. No measurements were performed to arrive at that estimation, only my observations at the time. The actual amount of waste on the site may vary significantly from that estimation.

SUMMARY OF APPARENT VIOLATIONS

ILLINOIS ENVIRONMENTAL PROTECTION ACT (415 ILCS 5/1 et seq.)

Section 9 (a) of the Act: No person shall ... 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. Contaminants on the site were discharged into the environment in a manner that tends to cause air pollution.

Section 9 (c) of the Act: No person shall ... cause or allow the open burning of refuse. Open burning of refuse was observed on the site.

Section 21 (a) of the Act: No person shall ... cause or allow the open dumping of any waste. Open dumping was observed on the site.

Section 21 (d)(1) of the Act: No person shall ... conduct any waste storage, waste-treatment, or waste-disposal operation without ... a permit granted by the Agency. No Agency permit to conduct a waste storage, waste-treatment, or waste-disposal operation for the site was issued.

Section 21 (d)(2) of the Act: No person shall ... conduct any waste-storage, waste-treatment, or waste disposal operation ... in violation of any regulations or standards adopted by the Board under the Act. Violations of the Illinois Pollution Control Board Regulations were observed at the site where waste storage, waste-treatment, or waste-disposal operations were taking place.

Section 21(e) of the Act: No person shall ... dispose, treat, store or abandon any waste ... except at a site or facility which meets the requirements of this Act and of regulations and standards thereunder. The storage and disposal of waste was occurring at a site which did not meet the requirements of the Illinois Environmental Protection Act and the Illinois Pollution Control Board Regulations.

Section 21 (p)(1) of the Act: No person shall ... cause or allow the open dumping of any waste which results in ... litter. Open dumping of waste resulting in litter was observed at the site.

Section 21 (p)(3) of the Act: No person shall ... cause or allow the open dumping of any waste which results in ... open burning. The open dumping of waste resulting in open burning was observed at the site.

Section 21 (p)(7) of the Act: No person shall ... cause or allow the open dumping of any waste which results in ... the deposition of general construction or demolition debris; or clean construction or demolition debris. Open dumping resulting in the deposition of general and clean construction and demolition debris was observed at the site.

Section 55 (a)(1) of the Act: No person shall ... cause or allow the open dumping of any used or waste tire. Open dumping of waste tires was observed at the site.

Section 55 (a)(2) of the Act: No person shall ... cause or allow the open burning of any used or waste tire. Evidence of the open burning of waste tires was observed at the site.

LPC #1830905032

Tilton/Butler

8/25/03

Page 4 of 4

ILLINOIS POLLUTION CONTROL BOARD; 35 ILLINOIS ADMINISTRATIVE CODE,
SUBTITLE G
(REGULATIONS)

Section 812.101 of the Regulations: ... All persons, except those specifically exempted by Section 21(d) of the Environmental Protection Act (Act) [415 ILCS 5/21(d)], shall submit to the Agency an application for a permit to develop and operate a landfill. The application must contain the information required by this Subpart and by Section 39(a) of the Act, except as otherwise provided in 35 Ill. Adm. Code 817. No such application for a permit to develop and operate a landfill was submitted.

STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY

SITE SKETCH

Date of Inspection: AUGUST 25, 2003

Inspector: DOUGLAS TOOLE

Site Code: 1 8 3 0 9 0 5 0 3 2

County: VERMILION

Site Name: TILTON / BUTLER

Time: 2:20 P.M. - 2:30 P.M.

1ST
AVENUE

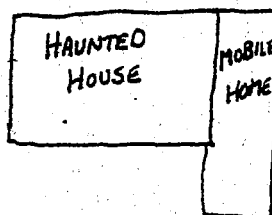
4
N

15TH STREET

12

11

1, 2

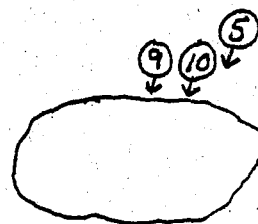


3



4

8

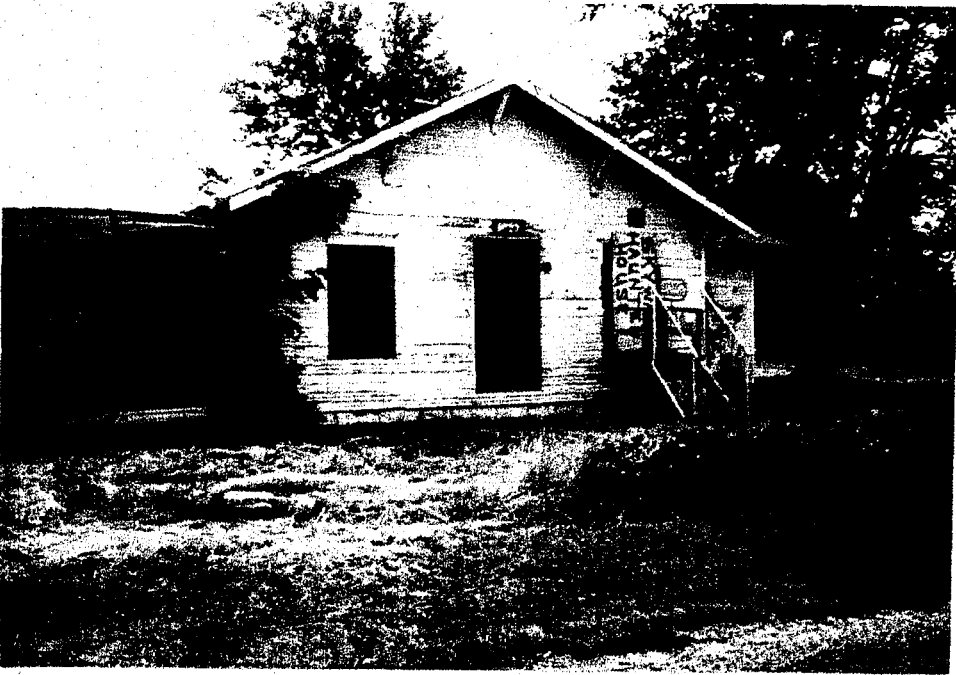


7

6



INSPECTION PHOTOS

DATE: <u>8 / 25 / 03</u>	SITE #: <u>1 8 3 0 9 0 5 0 3 2</u> CO.: <u>VERMILION</u>
TIME: <u>2:21 P.M.</u>	SITE NAME: <u>TILTON / BUTLER</u>
PHOTOGRAPH TAKEN BY: <u>DOUGLAS TOOLE</u>	
COMMENTS: Pictures taken toward: <u>SW</u>	
OVERVIEW OF SITE	
FROM <u>15TH STREET;</u>	
<u>1ST OF 2 PANORAMIC SHOTS</u>	
ROLL #: PHOTO #: <u>1</u>	

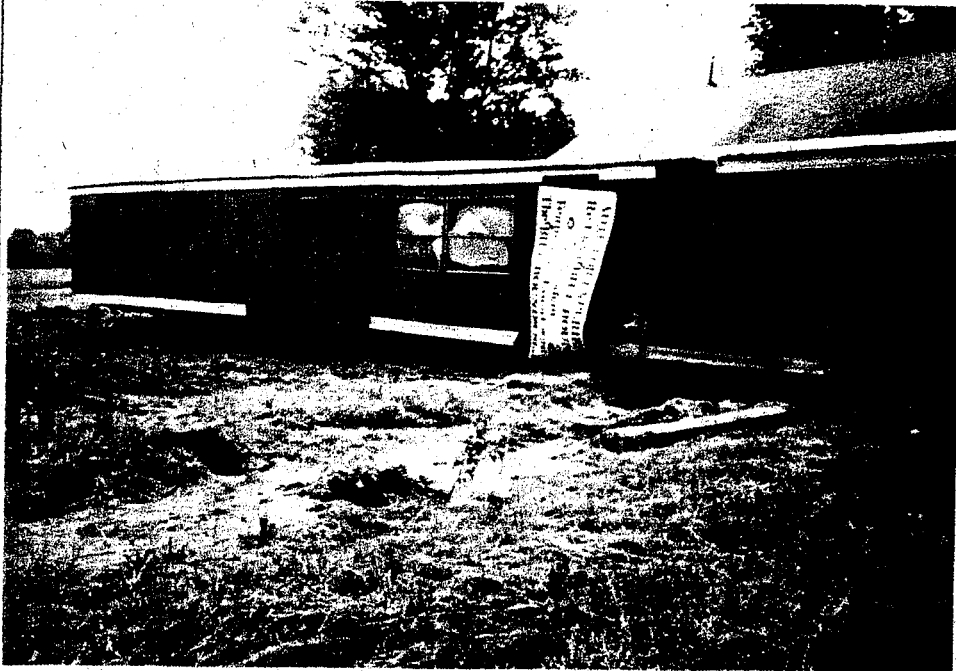
DATE: <u>8 / 25 / 03</u>
TIME: <u>2:21 P.M.</u>
PHOTOGRAPH TAKEN BY: <u>DOUGLAS TOOLE</u>
COMMENTS: Pictures taken toward: <u>SE</u>
OVERVIEW OF SITE
FROM <u>15TH STREET;</u>
<u>2ND OF 2 PANORAMIC SHOTS</u>
ROLL #: PHOTO #: <u>2</u>



FOS



INSPECTION PHOTOS

DATE: <u>8 / 25 / 03</u>	SITE #: <u>1 8 3 0 9 0 5 0 3 2</u> CO.: <u>VERMILION</u>
TIME: <u>2:22 P.M.</u>	SITE NAME: <u>TILTON / BUTLER</u>
PHOTOGRAPH TAKEN BY: <u>DOUGLAS TOOLE</u>	
COMMENTS: Pictures taken toward: <u>SW</u>	
<u>MOBILE HOME FROM PHOTOS #1+2</u>	
ROLL #: PHOTO #: <u>3</u>	

DATE: <u>8 / 25 / 03</u>
TIME: <u>2:22 P.M.</u>
PHOTOGRAPH TAKEN BY: <u>DOUGLAS TOOLE</u>
COMMENTS: Pictures taken toward: <u>S</u>
<u>VIEW OF PILE FROM NORTH</u>
ROLL #: PHOTO #: <u>4</u>



FOS



INSPECTION PHOTOS

DATE: <u>8 / 25 / 03</u>	SITE #: <u>1 8 3 0 9 0 5 0 3 2</u> CO.: <u>VERMILION</u>
TIME: <u>2:23 P.M.</u>	SITE NAME: <u>TILTON / BUTLER</u>
PHOTOGRAPH TAKEN BY: <u>DOUGLAS TOOLE</u>	
COMMENTS: Pictures taken toward: <u>SW</u>	
<u>VIEW OF PILE FROM NORTH</u>	
ROLL #: PHOTO #: <u>5</u>	

DATE: <u>8 / 25 / 03</u>
TIME: <u>2:24 P.M.</u>
PHOTOGRAPH TAKEN BY: <u>DOUGLAS TOOLE</u>
COMMENTS: Pictures taken toward: <u>NW</u>
<u>VIEW OF PILE FROM SOUTH</u>
ROLL #: PHOTO #: <u>6</u>



FOS



INSPECTION PHOTOS

DATE: <u>8 / 25 / 03</u>	SITE #: <u>1 8 3 0 9 0 5 0 3 2</u> CO.: <u>VERMILION</u>
TIME: <u>2:24 P.M.</u>	SITE NAME: <u>TILTON / BUTLER</u>
PHOTOGRAPH TAKEN BY: <u>DOUGLAS TOOLE</u>	
COMMENTS: Pictures taken toward: <u>N</u>	
<u>VIEW OF PILE FROM SOUTH</u>	
ROLL #: PHOTO #: <u>7</u>	

DATE: <u>8 / 25 / 03</u>
TIME: <u>2:24 P.M.</u>
PHOTOGRAPH TAKEN BY: <u>DOUGLAS TOOLE</u>
COMMENTS: Pictures taken toward: <u>E</u>
<u>VIEW OF PILE FROM WEST</u>
ROLL #: PHOTO #: <u>8</u>



FOS



INSPECTION PHOTOS

DATE: <u>8 / 25 / 03</u>	SITE #: <u>1 8 3 0 9 0 5 0 3 2</u> CO.: <u>VERMILION</u>
TIME: <u>2:26 P.M.</u>	SITE NAME: <u>TILTON / BUTLER</u>
PHOTOGRAPH TAKEN BY: <u>DOUGLAS TOOLE</u>	
COMMENTS: Pictures taken toward: <u>S</u>	
<u>CLOSER SHOT OF AREA</u> <u>FROM PHOTO #5</u>	
ROLL #: PHOTO #: <u>9</u>	

DATE: <u>8 / 25 / 03</u>
TIME: <u>2:26 P.M.</u>
PHOTOGRAPH TAKEN BY: <u>DOUGLAS TOOLE</u>
COMMENTS: Pictures taken toward: <u>SW</u>
<u>CLOSER SHOT OF AREA</u> <u>FROM PHOTO #5</u>
ROLL #: PHOTO #: <u>10</u>



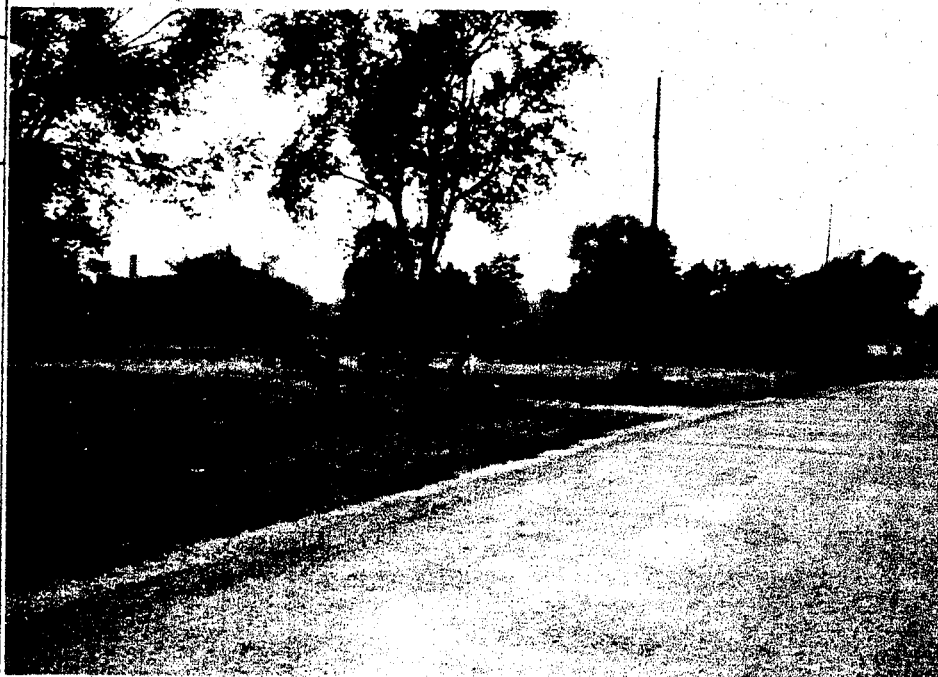
FOS



INSPECTION PHOTOS

DATE: <u>8 / 25 / 03</u>	SITE #: <u>1 8 3 0 9 0 5 0 3 2</u> CO.: <u>VERMILION</u>
TIME: <u>2:28 P.M.</u>	SITE NAME: <u>TILTON / BUTLER</u>
PHOTOGRAPH TAKEN BY: <u>DOUGLAS TOOLE</u>	
COMMENTS: Pictures taken toward: <u>SE</u>	
<u>VIEW OF SITE</u>	
<u>FROM 15TH STREET</u>	
ROLL #: PHOTO #: <u>11</u>	

DATE: <u>8 / 25 / 03</u>
TIME: <u>2:28 P.M.</u>
PHOTOGRAPH TAKEN BY: <u>DOUGLAS TOOLE</u>
COMMENTS: Pictures taken toward: <u>SW</u>
<u>WEST PART of PROPERTY</u>
ROLL #: PHOTO #: <u>12</u>



FOS

CITY & VILLAGE MAPS OF VERMILION COUNTY

