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MAY - 7 2004

STATE OF ILLINOIS
Pollution Control Board

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

PEOPLE OF THE STATE OF ILLINOIS,)	
)	
)	
Complainant,)	
)	PCB No. 02-3
v.)	(RCRA - Enforcement)
)	
CHEVRON ENVIRONMENTAL SERVICES)	
COMPANY, a Delaware Corporation,)	
)	
Respondent.)	

NOTICE OF FILING


TO: ATTACHED SERVICE LIST

PLEASE TAKE NOTICE that on May 7, 2004, we filed with the Illinois Pollution Control Board a ERRATA TO STIPULATION AND PROPOSAL FOR SETTLEMENT a true and correct copy of which is attached and hereby served upon you.

Respectfully submitted,

LISA MADIGAN
Attorney General
State of Illinois

BY:



Christopher P. Perzan
Assistant Attorney General
Environmental Bureau
188 W. Randolph St., 20th Floor
Chicago, Illinois 60601
(312) 814-3532

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ERRATA TO STIPULATION AND PROPOSAL FOR SETTLEMENT

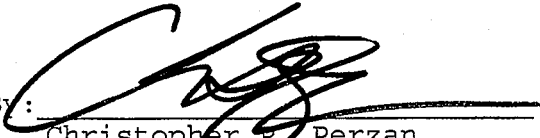
NOW COMES the Complainant, PEOPLE OF THE STATE OF ILLINOIS, by LISA MADIGAN, Attorney General of the State of Illinois, and for its ERRATA TO STIPULATION AND PROPOSAL FOR SETTLEMENT, states as follows:

1. On May 5, 2004 the Complainant filed a Stipulation and Proposal for Settlement with the Board. Certain copies in that filing contained a copying error on page 4 of the Stipulation and Proposal for Settlement. The corrected page 4 is attached.

WHEREFORE, the Complainant, PEOPLE OF THE STATE OF ILLINOIS, requests that the Board incorporate the complete page in place of the incomplete page.

Respectfully submitted,

PEOPLE OF THE STATE OF ILLINOIS

By: 
Christopher P. Perzan
Assistant Attorney General

Office of the Attorney General
Environmental Bureau
188 W. Randolph Street, 20th Floor
Chicago, Illinois 60601
312 814-3532

also requires Respondent to investigate and, as necessary, remediate all environmental conditions at the Lockport site.

6. On October 9, 2001, Texaco Inc., the parent of TRMI, became ChevronTexaco Corporation ("ChevronTexaco"). Upon an internal reorganization following the merger, Chevron Environmental Services Company assumed ownership and operational control of the former Texaco Lockport Refinery. The Illinois EPA approved a modification request on May 15, 2002 to transfer owner and operator status under the RCRA Permit to Chevron Environmental Services Company. This case was originally brought against TRMI, a motion to amend the complaint to change the Respondent's name to Chevron Environmental Services Company, as successor to Texaco Refining & Marketing has been filed concurrently with this Stipulation and Proposal for Settlement.

B. ALLEGED VIOLATIONS

1. Complainant's Complaint alleges the following violations:

COUNT I: Groundwater contamination in violation of Section 12(a) of the Act, 415 ILCS 5/12(a) (2000), and 35 Ill Adm. Code 620.405.

COUNT II: Caused or allowed open dumping of coke fines and tar like material in violation of Section 21(a) of the Act, 415 ILCS 5/21(a) (2000).

2. The Complainant contends that the evidence introduced if a hearing were held in this matter would demonstrate the presence of contaminants in the groundwater at the Facility each year, beginning in 1981 and continuing at least through the filing of this Stipulation and Proposal for Settlement.

3. The Respondent represents that it has entered into this

SERVICE LIST

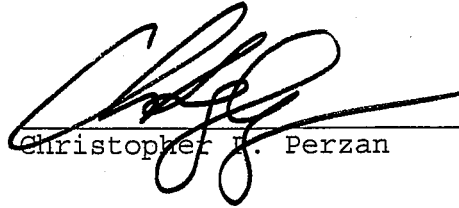
Dorothy M. Gunn
Clerk of the Board
Illinois Pollution Control
Board
100 W. Randolph St., 11th Floor
Chicago, Illinois 60601

John A. Urban, Civil Chief
Will County State's Attorney's
Office
121 N. Chicago Street
Joliet, Illinois 60432

Barbara Magel
Karaganis, White & Magel
North Orleans Street
Suite 810
Chicago, Illinois 60610

CERTIFICATE OF SERVICE

I, the undersigned, on oath [or affirmation] state that I have served on the date of May 7, 2004, the attached ERRATA TO STIPULATION AND PROPOSAL FOR SETTLEMENT, by U.S. Mail upon the persons on the attached Service List.



Christopher J. Perzan

Dated: May 7, 2004