

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

SABIC INNOVATIVE PLASTICS US LLC,)
)
)
Petitioner,)
)
v.)
)
ILLINOIS ENVIRONMENTAL)
PROTECTION AGENCY,)
)
Respondent.)

PCB 14-24
(Permit Appeal- Water)

RECEIVED
FEB 9 4 2015
ILLINOIS
Pollution Control Board

 ORIGINAL

NOTICE OF FILING

To: Division of Legal Counsel
Illinois Environmental Protection Agency
1021 North Grand Avenue East
P.O. Box 19276
Springfield, IL 62794-9276

Ellen F. O’Laughlin
Office of the Attorney General
69 W. Washington Street, Suite 1800
Chicago, IL 60602

Bradley P. Halloran
Hearing Officer
Illinois Pollution Control Board
James R. Thompson Center
100 West Randolph Street, Suite 11-500
Chicago, IL 60601

Christopher J. Grant
Office of the Attorney General
69 W. Washington Street, Suite 1800
Chicago, IL 60602

PLEASE TAKE NOTICE that I have filed by mail with the Office of the Clerk of the Pollution Control Board the **PETITIONER’S MOTION TO DISMISS**, a copy of which is herewith served upon you.


Alphonse McMahon
Senior Counsel, Environmental, Health, Safety and
Security
SABIC
1 Lexan Lane
Mount Vernon, IN 47620
Phone: (812) 831-4688
Fax: (866) 505-7124
E-mail: al.mcmahon@sabic-ip.com

February 3, 2015

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

SABIC INNOVATIVE PLASTICS US LLC,)
)
)
Petitioner,)
)
)
v.) PCB 14-24
) (Permit Appeal- Water)
)
ILLINOIS ENVIRONMENTAL)
PROTECTION AGENCY,)
)
)
Respondent.)

RECEIVED
CLERK'S OFFICE
FEB 04 2015
STATE OF ILLINOIS
Pollution Control Board

PETITIONER'S MOTION TO DISMISS

Pursuant to 35 Illinois Administrative Code ("IAC") section 101.500, SABIC Innovative Plastics US LLC ("SABIC"), by and through its attorney Alphonse McMahon, hereby requests that the Illinois Pollution Control Board dismiss SABIC's appeal in this matter.

Respectfully submitted,

SABIC INNOVATIVE PLASTICS US LLC

By: Alphonse McMahon
Alphonse McMahon
Senior Counsel, Environmental, Health, Safety and
Security
SABIC
1 Lexan Lane
Mount Vernon, IN 47620
Phone: (812) 831-4688
Fax: (866) 505-7124
E-mail: al.mcmahon@sabic-ip.com

February 3, 2015

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

SABIC INNOVATIVE PLASTICS US LLC,)
)
)
Petitioner,)
)
v.) PCB 14-24
) (Permit Appeal- Water)
)
ILLINOIS ENVIRONMENTAL)
PROTECTION AGENCY,)
)
Respondent.)

RECEIVED
FEB 9 4 2015
ILLINOIS
POLLUTION CONTROL BOARD

CERTIFICATE OF SERVICE


I, the undersigned, certify that I have served the attached **PETITIONER'S MOTION TO DISMISS** on February 3, 2015 by first-class mail, upon the following persons:

Division of Legal Counsel
Illinois Environmental Protection Agency
1021 North Grand Avenue East
P.O. Box 19276
Springfield, IL 62794-9276

Ellen F. O'Laughlin
Office of the Attorney General
69 W. Washington Street, Suite 1800
Chicago, IL 60602

Bradley P. Halloran
Hearing Officer
Illinois Pollution Control Board
James R. Thompson Center
100 West Randolph Street, Suite 11-500
Chicago, IL 60601

Christopher J. Grant
Office of the Attorney General
69 W. Washington Street, Suite 1800
Chicago, IL 60602



Alphonse McMahon
Senior Counsel, Environmental, Health, Safety and
Security

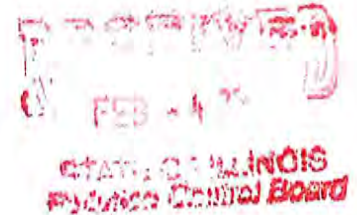
SABIC
1 Lexan Lane
Mount Vernon, IN 47620
Phone: (812) 831-4688
Fax: (866) 505-7124
E-mail: al.mcmahon@sabic-ip.com

February 3, 2015



February 3, 2015

Pollution Control Board, Attn: Clerk
100 West Randolph Street
James R. Thompson Center, Suite 11-500
Chicago, IL 60601-3218



**Re: SABIC Innovative Plastics US LLC
NPDES Permit Appeal PCB 14-24**



Dear Sir or Madam:

Enclosed for filing in the above-referenced matter are the originals (signed) and 9 copies of each of the following:

1. Petitioner's Motion to Dismiss,
2. Notice of Filing, and
3. Certificate of Service

Please contact me at (812) 831-4688 if you have any questions. Thank you for your assistance.

Sincerely,

Alphonse McMahon
Senior Counsel, EHSS

cc: Ellen F. O'Laughlin
Christopher J. Grant
Bradley P. Halloran
Division of Legal Counsel, Illinois EPA