

CLERK'S OFFICE

**BEFORE THE ILLINOIS POLLUTION CONTROL BOARD** SEP 23 2003

STATE OF ILLINOIS  
Pollution Control Board

**The CITY OF CHICAGO,**  
an Illinois municipal corporation,

Complainant,

V.

PCB No. 04-29

(Enforcement – Land, Citizens)

**PUREX INDUSTRIES, INC.,**

a Delaware corporation,

**FEDERAL CHICAGO CORP.,**

an Illinois corporation

**FEDERAL DIE CASTING CO.,**

an Illinois corporation,

**RAYMOND E. CROSS,**

an individual

### Respondents.

## NOTICE OF FILING

To:

**For Purex Industries, Inc.:**

Robert L. Graham

Bill S. Forcade

Jason E. Yearout

Jenner &amp; Block, LLC

One IBM Plaza

Chicago, Illinois 60611

**For Federal Die Casting Co., Federal Chicago Corp., Raymond E. Cross, Lakeside Bank, Trust Nos. 10-1087, 10-1343, Beverly Bank, Trust No. 8-7611:**

Cary R. Perlman

Carrie L. Taubman

Latham & Watkins

## 5800 Sears Tower

233 South Wacker Drive

Chicago, Illinois 60606

**PLEASE TAKE NOTICE** that I have today filed with the Office of the Clerk of the Pollution Control Board the **NON-PARTY 2222 ELSTON LLC'S NOTICE OF NON-OPPOSITION TO THE CITY OF CHICAGO'S MOTION TO CONSOLIDATE CASES**

**THIS FILING IS SUBMITTED ON RECYCLED PAPER**

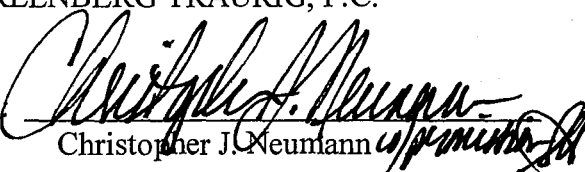
PCB 03-55 AND PCB 04-29, and CERTIFICATE OF SERVICE filed on behalf of Non-party, 2222 Elston LLC, a copy of which is herewith served upon you.

Dated: September 19th, 2003

Respectfully submitted,

GREENBERG TRAURIG, P.C.

By

  
Christopher J. Neumann

Attorneys for Complainant 2222 Elston LLC

Francis A. Citera, Esq.  
Daniel T. Fahner, Esq.  
Greenberg Traurig, P.C.  
77 West Wacker Drive  
Suite 2500  
Chicago, Illinois 60601  
Telephone: (312) 456-8400  
Facsimile: (312) 456-8435

Craig V. Richardson, Esq.  
Christopher J. Neumann, Esq.  
Greenberg Traurig, L.L.P.  
1200 Seventeenth Street  
Twenty-Fourth Floor  
Denver, Colorado 80202  
Telephone: (303) 572-6500  
Facsimile: (303) 572-6540

#77398

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

RECEIVED

CLERK'S OFFICE

SEP 23 2003

The CITY OF CHICAGO,  
an Illinois municipal corporation,

Complainant,

v.

PUREX INDUSTRIES, INC.,  
a Delaware corporation,  
FEDERAL CHICAGO CORP.,  
an Illinois corporation  
FEDERAL DIE CASTING CO.,  
an Illinois corporation,  
RAYMOND E. CROSS,  
an individual

Respondents.

PCB No. 04-29

(Enforcement – Land, Citizens)

STATE OF ILLINOIS  
Pollution Control Board

NON-PARTY 2222 ELSTON LLC'S NOTICE OF NON-OPPOSITION TO THE CITY  
OF CHICAGO'S MOTION TO CONSOLIDATE CASES PCB 03-55 AND PCB 04-29

Non-party, 2222 Elston LLC, hereby gives notice to the above-captioned Board of its non-opposition to the Motion to Consolidate matter numbers PCB 03-55 and PCB 04-29, which motion was filed by the City of Chicago on September 5, 2003. 2222 Elston LLC agrees that, in the interests of administrative efficiency and to avoid any risk of inconsistent factual or legal rulings in these closely related cases, consolidation is appropriate and warranted.

Dated: September 19, 2003

Respectfully submitted,

GREENBERG TRAURIG, L.L.P.

By:

Christopher J. Neumann

Attorneys for Complainant 2222 Elston LLC

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BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

<b>The CITY OF CHICAGO,</b>	)	
an Illinois municipal corporation,	)	
	)	
Complainant,	)	
	)	PCB No. 04-29
v.	)	(Enforcement – Land, Citizens)
	)	
<b>PUREX INDUSTRIES, INC.,</b>	)	
a Delaware corporation,	)	
<b>FEDERAL CHICAGO CORP.,</b>	)	
an Illinois corporation	)	
<b>FEDERAL DIE CASTING CO.,</b>	)	
an Illinois corporation,	)	
<b>RAYMOND E. CROSS,</b>	)	
an individual	)	
	)	
Respondents.	)	
	)	
	)	
	)	
	)	

CERTIFICATE OF SERVICE

I, the undersigned, certify that I have served the attached **NON-PARTY 2222 ELSTON LLC'S NOTICE OF NON-OPPOSITION OF THE CITY OF CHICAGO'S MOTION TO CONSOLIDATE CASES PCB 03-55 AND PCB 04-29**, and **NOTICE OF FILING** upon the Respondents on September 19th, 2003, by:

☐ certified mail

☐ registered mail

☐ messenger service

☐ personal service

☒ U.S. Mail

at the addresses below:

THIS FILING IS SUBMITTED ON RECYCLED PAPER

**For Purex Industries, Inc.:**

Robert L. Graham  
Bill S. Forcade  
Steven M. Siros  
Jason E. Yearout  
Jenner & Block, LLC  
One IBM Plaza  
Chicago, Illinois 60611

**Hearing Officer:**

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

Francis A. Citera, Esq.  
Daniel T. Fahner, Esq.  
Greenberg Traurig, P.C.  
77 West Wacker Drive  
Suite 2500  
Chicago, Illinois 60601  
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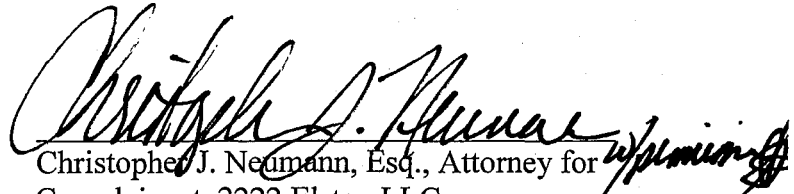
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**For Federal Die Casting Co., Federal  
Chicago Corp., Raymond E. Cross,  
Lakeside Bank, Trust Nos. 10-1087, 10-1343,  
Beverly Bank, Trust No. 8-7611:**

Cary R. Perlman  
Carrie L. Taubman  
Latham & Watkins  
5800 Sears Tower  
233 South Wacker Drive  
Chicago, Illinois 60606

**City of Chicago**

Mara S. Georges  
Diane M. Pezanoski  
George D. Theophilos  
Charles A. King  
Chicago Department of Law  
30 N. LaSalle St., Suite 900  
Chicago, IL 60602

  
Christopher J. Neumann, Esq., Attorney for  
Complainant, 2222 Elston LLC