

ILLINOIS POLLUTION CONTROL BOARD
July 24, 2025

ILLINOIS ENVIRONMENTAL)	
PROTECTION AGENCY,)	
)	
Complainant,)	
)	
v.)	AC 25-6
)	(IEPA No. 79-25-AC)
GRAINLAND FARMERS, an Illinois)	(Administrative Citation)
Agricultural Cooperative,)	
)	
Respondent.)	

OPINION AND ORDER OF THE BOARD (by M.D. Mankowski):

On May 28, 2025, the Illinois Environmental Protection Agency (Agency) timely filed an administrative citation against Grainland Farmers. *See* 415 ILCS 5/31.1(c) (2024); 35 Ill. Adm. Code 101.300(b), 108.200(b)(3). The administrative citation concerns Grainland Farmers’ property located at 927 County Highway 3 in Eureka, Woodford County. The property is commonly known to the Agency as the “Eureka/Grainland Cooperative” site and is designated with Site Code No. 2030205038. For the reasons below, the Board finds that Grainland Farmers violated the Environmental Protection Act (Act) (415 ILCS 5 (2024)) and orders Grainland Farmers to pay \$4,500 in civil penalties.

Under the Act, an administrative citation is an expedited enforcement action brought before the Board seeking civil penalties that are fixed by statute. Administrative citations may be filed only by the Agency or, if the Agency has delegated the authority, by a unit of local government, and only for limited types of alleged violations. *See* 415 ILCS 5/21(o), 21(p), 22.51, 22.51a, 31.1(c), 42(b)(4), 42(b)(4-5), 55(k) (2024); 35 Ill. Adm. Code Part 108.

In this case, the Agency alleges that on April 9, 2025, Grainland Farmers violated Section 21(p)(1), (p)(3), and (p)(7) of the Act (415 ILCS 5/21(p)(1), (p)(3), (7) (2024)) by causing or allowing open dumping of waste in a manner resulting in litter, open burning, and deposition of general construction or demolition debris or clean construction or demolition debris. The Agency asks the Board to impose the statutory \$1,500 civil penalty per violation on Grainland Farmers, for a total civil penalty of \$4,500. As required, the Agency served Grainland Farmers with the administrative citation on June 2, 2025, which is within “60 days after the date of the observed violation.” 415 ILCS 5/31.1(b) (2024); *see also* 35 Ill. Adm. Code 101.300(c), 108.200(b)(1).

To contest an administrative citation, a respondent must file a petition with the Board no later than 35 days after being served with the administrative citation. If the respondent fails to do so, the Board must find that the respondent committed the violations alleged and impose the corresponding civil penalty. *See* 415 ILCS 31.1(d)(1) (2024); 35 Ill. Adm. Code 101.300(b),

108.204(b), 108.406. Here, any petition for review was due by July 7, 2025. Grainland Farmers failed to timely file a petition. Accordingly, the Board finds that Grainland Farmers violated Section 21(p)(1), (p)(3), and (p)(7) of the Act.

The civil penalty for violating any provision of Section 21(p) is \$1,500 for each violation, except that the penalty amount is \$3,000 for each violation that is the person's second or subsequent adjudicated violation of that provision. *See* 415 ILCS 5/42(b)(4-5) (2024); 35 Ill. Adm. Code 108.500(a). Because there are three violations of Section 21(p) and no indication in the record that any of these is a second or subsequent adjudicated violation, the total civil penalty is \$4,500. Under Section 31.1(d)(1) of the Act, the Board attaches the administrative citation and makes it part of the order below.

This opinion constitutes the Board's finding of fact and conclusions of law.

ORDER

1. The Board finds that Grainland Farmers violated Section 21(p)(1), (p)(3), and (p)(7) of the Environmental Protection Act (415 ILCS 5/21(p)(1), (p)(3), and (p)(7) (2024)).
2. Grainland Farmers must pay a civil penalty of \$4,500 no later than Monday, August 25, 2025, which is the first business day following the 30th day after the date of this order. Grainland Farmers must pay the civil penalty by certified check or money order, made payable to the Illinois Environmental Protection Trust Fund. The case number and case name must appear on the certified check or money order.
3. Grainland Farmers must send the certified check or money order to:

Illinois Environmental Protection Agency
Fiscal Services Division
2520 West Iles Avenue
P.O. Box 19276
Springfield, Illinois 62794-9276
4. Penalties unpaid within the time prescribed will accrue interest under Section 42(g) of the Environmental Protection Act (415 ILCS 5/42(g) (2024)) at the rate set forth in Section 1003(a) of the Illinois Income Tax Act (35 ILCS 5/1003(a) (2024)).
5. Payment of this penalty does not prevent future prosecution if the violations continue.

IT IS SO ORDERED.

Section 41(a) of the Environmental Protection Act provides that final Board orders may be appealed directly to the Illinois Appellate Court within 35 days after the Board serves the order. 415 ILCS 5/41(a) (2024); *see also* 35 Ill. Adm. Code 101.300(d)(2), 101.906, 102.706. Illinois Supreme Court Rule 335 establishes filing requirements that apply when the Illinois Appellate Court, by statute, directly reviews administrative orders. 172 Ill. 2d R. 335. The Board's procedural rules provide that motions for the Board to reconsider or modify its final orders may be filed with the Board within 35 days after the order is received. 35 Ill. Adm. Code 101.520; *see also* 35 Ill. Adm. Code 101.902, 102.700, 102.702. Filing a motion asking that the Board reconsider this final order is not a prerequisite to appealing the order. 35 Ill. Adm. Code 101.902.

Names and Addresses for Receiving Service of Any Petition for Review Filed with the Appellate Court	
Parties	Board
Illinois Environmental Protection Agency Attn: Michelle M. Ryan 2520 West Iles Ave. P.O. Box 19276 Springfield, IL 62794	Illinois Pollution Control Board Attn: Don A. Brown, Clerk 60 East Van Buren Street, Suite 630 Chicago, Illinois 60605 don.brown@illinois.gov
Grainland Farmers Attn: Terry Lee Bline 1861 State Route 116 Roanoke, IL 61561	

I, Don A. Brown, Clerk of the Illinois Pollution Control Board, certify that the Board adopted the above opinion and order on July 24, 2025, by a vote of 4-0.



Don A. Brown, Clerk
 Illinois Pollution Control Board

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

ILLINOIS ENVIRONMENTAL)	
PROTECTION AGENCY,)	
)	
)	
Complainant,)	AC 2025-
)	
v.)	(IEPA No. 79-25-AC)
)	
GRAINLAND FARMERS, an Illinois)	
Agricultural Cooperative)	
)	
Respondent.)	
)	

NOTICE OF FILING

To: Grainland Farmers
c/o Terry Lee Bline
1861 State Route 116
Roanoke, IL 61561-7759

PLEASE TAKE NOTICE that on this date I electronically filed with the Clerk of the Pollution Control Board of the State of Illinois the following instrument(s) entitled ADMINISTRATIVE CITATION, AFFIDAVIT, and OPEN DUMP INSPECTION CHECKLIST.

Respectfully submitted,


e-signature valid for IPCB e-filings ONLY

Michelle M. Ryan
Assistant Counsel

Illinois Environmental Protection Agency
2520 West Iles Avenue
P.O. Box 19276
Springfield, Illinois 62794-9276
(217) 782-5544

Dated: May 28, 2025

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

ADMINISTRATIVE CITATION

ILLINOIS ENVIRONMENTAL)	
PROTECTION AGENCY,)	
)	
Complainant,)	AC 2025-
)	
v.)	(IEPA No. 79-25-AC)
)	
GRAINLAND FARMERS, an Illinois)	
Agricultural Cooperative)	
)	
)	
Respondent.)	

JURISDICTION

This Administrative Citation is issued pursuant to the authority vested in the Illinois Environmental Protection Agency by Section 31.1 of the Illinois Environmental Protection Act, 415 ILCS 5/31.1 (2024).

FACTS

1. That Grainland Farmers is the present owner and operator of a property located at 927 County Highway 3, Eureka, Woodford County, Illinois. The property is commonly known to the Illinois Environmental Protection Agency as Eureka/Grainland Cooperative.
2. That said facility is an open dump operating without an Illinois Environmental Protection Agency Operating Permit and is designated with Site Code No. 2030205038.
3. That Respondent has operated said facility at all times pertinent hereto.
4. That on April 9, 2025, Nathan Graham of the Illinois Environmental Protection Agency's Peoria Regional Office inspected the above-described facility. A copy of his inspection report setting forth the results of said inspection is attached hereto and made a part hereof.

5. That on May 28, 2025, Illinois EPA sent this Administrative Citation via Certified Mail No. 7022 3330 0000 8734 6299 to Grainland Farmers.

VIOLATIONS

Based upon direct observations made by Nathan Graham during the course of his April 9, 2025 inspection of the above-named facility, the Illinois Environmental Protection Agency has determined that Respondent has violated the Illinois Environmental Protection Act (hereinafter, the "Act") as follows:

- (1) That Respondent caused or allowed the open dumping of waste in a manner resulting in litter, a violation of Section 21(p)(1) of the Act, 415 ILCS 5/21(p)(1) (2024).
- (2) That Respondent caused or allowed the open dumping of waste in a manner resulting in open burning, a violation of Section 21(p)(3) of the Act, 415 ILCS 5/21(p)(3) (2024).
- (3) That Respondent caused or allowed the open dumping of waste in a manner resulting in deposition of general construction or demolition debris or clean construction or demolition debris, a violation of Section 21(p)(7) of the Act, 415 ILCS 5/21(p)(7) (2024).

CIVIL PENALTY

Pursuant to Section 42(b)(4-5) of the Act, 415 ILCS 5/42(b)(4-5) (2024), Respondent is subject to civil penalties of One Thousand Five Hundred Dollars (\$1,500.00) for each of the violations identified above, for a total of Four Thousand Five Hundred Dollars (\$4,500.00). If Respondent elects not to petition the Illinois Pollution Control Board, the statutory civil penalties specified above shall be due and payable no later than July 13, 2025, unless otherwise provided by order of the Illinois Pollution Control Board.

If Respondent elects to contest this Administrative Citation by petitioning the Illinois Pollution Control Board in accordance with Section 31.1 of the Act, 415 ILCS 5/31.1 (2024), and if the Illinois

Pollution Control Board issues a finding of violation as alleged herein, after an adjudicatory hearing, Respondent shall be assessed the associated hearing costs incurred by the Illinois Environmental Protection Agency and the Illinois Pollution Control Board. Those hearing costs shall be assessed in addition to the One Thousand Five Hundred Dollar (\$1,500.00) statutory civil penalty for each violation.

Pursuant to Section 31.1(d)(1) of the Act, 415 ILCS 5/31.1(d)(1) (2024), if Respondent fails to petition or elects not to petition the Illinois Pollution Control Board for review of this Administrative Citation within thirty-five (35) days of the date of service, the Illinois Pollution Control Board shall adopt a final order, which shall include this Administrative Citation and findings of violation as alleged herein, and shall impose the statutory civil penalty specified above.

When payment is made, Respondent's check shall be made payable to the Illinois Environmental Protection Trust Fund and mailed to the attention of Fiscal Services, Illinois Environmental Protection Agency, 2520 West Iles Avenue, P.O. Box 19276, Springfield, Illinois 62794-9276. Along with payment, Respondent shall complete and return the enclosed Remittance Form to ensure proper documentation of payment.

If any civil penalty and/or hearing costs are not paid within the time prescribed by order of the Illinois Pollution Control Board, interest on said penalty and/or hearing costs shall be assessed against the Respondent from the date payment is due up to and including the date that payment is received. The Office of the Illinois Attorney General may be requested to initiate proceedings against Respondent in Circuit Court to collect said penalty and/or hearing costs, plus any interest accrued.

PROCEDURE FOR CONTESTING THIS
ADMINISTRATIVE CITATION

Respondent has the right to contest this Administrative Citation pursuant to and in accordance with Section 31.1 of the Act, 415 ILCS 5/31/1 (2024). If Respondent elects to contest this Administrative Citation, then Respondent shall file a Petition for Review, including a Notice of Filing, Certificate of Service, and Notice of Appearance, with the Clerk of the Illinois Pollution Control Board, 60 E. Van Buren Street, Suite 630, Chicago, Illinois 60605. A copy of said Petition for Review shall be filed with the Illinois Environmental Protection Agency's Division of Legal Counsel at 2520 West Iles Avenue, P.O. Box 19276, Springfield, Illinois 62794-9276. Section 31.1 of the Act provides that any Petition for Review shall be filed within thirty-five (35) days of the date of service of this Administrative Citation or the Illinois Pollution Control Board shall enter a default judgment against the Respondent.



Andrew Armstrong, Chief Legal Counsel
Illinois Environmental Protection Agency

Date: 05/28/2025

Prepared by: Dawn A. Hollis, Legal Assistant
Division of Legal Counsel
Illinois Environmental Protection Agency
2520 West Iles Avenue
P.O. Box 19276
Springfield, Illinois 62794-9276
(217) 782-5544

Illinois Environmental Protection Agency

Bureau of Land – Field Operations Section

Inspection Report

General Facility Information

BOL ID	2030205038	Evaluation Date	4/9/2025
USEPA ID	N/A	Region	Peoria
Site Name	Grainland Cooperative	County	Woodford
Address	927 County Highway 3	Phone	309-467-2355
City/State/Zip	Eureka, Illinois 61530	EJ Status	None
Limited English	<input type="checkbox"/>	Primary Language	English

Observations

Time	1058-1119 hours
Weather Conditions	Rain
Temperature	37° Fahrenheit
Photos Taken	Yes
Amount of Waste	About 30 cubic yards
Complaint Id	7749

Evaluation Type

Solid Waste Program - Open Dump Inspection

Owner

Grainland Cooperative
 Attn: Terry Bline
 927 County Highway 3
 Eureka, Illinois 61530

Operator

Grainland Cooperative
 Attn: Terry Bline
 927 County Highway 3
 Eureka, Illinois 61530

Inspection Participants

<u>Person</u>	<u>Affiliation</u>	<u>Phone</u>
Nathan Graham	IEPA FOS Primary Inspector	(309) 671-4720
Donald LaPonsie	IEPA FOS Secondary Inspector	(309) 671-3086

Persons Interviewed

<u>Person</u>	<u>Phone</u>	<u>E-Mail</u>
No one interviewed		

Permit

<u>Application Date</u>	<u>Log #</u>	<u>Issue Date</u>	<u>Expiration Date</u>	<u>Mod/Sp #</u>	<u>Mod/Sp Date</u>
NONE					

Active Enforcement Orders

<u>CACO</u>	<u>Consent Decree</u>	<u>CAFO</u>	<u>IPCB</u>	<u>Federal Court</u>	<u>State Court</u>
NONE					

Executive Summary

On April 9, 2025, I (Nathan Graham, BOL/FOS – Peoria) and Donald LaPonsie, BOL/FOS – Peoria, conducted a follow-up inspection at Grainland Cooperative located at 927 County Highway 3 in Eureka, Woodford County, Illinois. The initial inspection was conducted in response to complaints stating that open dumping and open burning occurred on the property. According to the Woodford County GIS website, the property is owned by Terry Bline. Apparent violations were observed.

Evaluation Narrative

Background

On July 3, 2024, Citizen's Complaint Investigation no. 7749 was conducted on the property, and as a result of the inspection, Violation Notices (VNs) L-2024-00242 and L-2024-00243 were sent to Grainland Farmers and Grainland Cooperative, respectively, on August 5, 2024.

On September 13, 2024, the Illinois EPA received a response from Terry Bline, the owner and operator of Grainland Cooperative, indicating a wish to enter into a Compliance Commitment Agreement (CCA) with the Illinois EPA.

On October 28, 2024, a CCA between the Illinois EPA and Grainland Cooperative was executed indicating that as of September 16, 2024, the property had been cleaned.

On October 30, 2024, a follow-up inspection was conducted at the property, and a new area of open-dumped and open-burned solid waste was observed. As a result of the inspection, VN L-2025-00013 was sent to Grainland Cooperative on January 13, 2025.

On January 30, 2025, the Illinois EPA received a response from Terry Bline indicating a wish to enter into a CCA with the Illinois EPA.

On March 19, 2025, a CCA between the Illinois EPA and Grainland Cooperative was executed, indicating that as of January 29, 2025, all open dumping and open burning have ceased and will no longer occur.

Inspection

LaPonsie and I arrived at the property at approximately 1058 hours. I took photographs to document observations made during the inspection. The property's photograph locations and GPS coordinates have been plotted on this report's Illinois EPA Site Map. Photograph 1 depicts the front entrance of the property as observed from County Highway 3.

I proceeded to the main office building, where I was greeted by the front desk attendant. I informed them of the reason for my inspection and asked to speak with Terry Bline, the owner. The front desk attendant stated the Bline was not present at the time. I asked the attendant to let Bline know I came by, and I continued to tour the property accompanied by LaPonsie.

The areas where the open-dumped solid waste was observed from the last two inspections were cleaned. Photographs 2 and 3 depict the clean areas.

I continued touring the property and observed an area of open-dumped solid waste with evidence of open-burned solid waste comprised of railroad ties and charred wood. Photographs 4 and 5 depict the area of open-dumped solid waste with evidence of open-burned solid waste.

I observed an area of open-dumped solid waste comprised of metal piping, rebar, and landscape waste. Photograph 6 depicts the area of open-dumped solid waste.

I observed another area of open-dumped solid waste comprised of concrete with protruding rebar, wiring, brick, and landscape waste. Photograph 7 depicts the area of open-dumped solid waste.

LaPonsie and I departed the property at approximately 1119 hours. Although Grainland Cooperative cleaned the original areas of open-dumped and open-burned solid waste, the area of open-burned solid waste with railroad ties suggests open burning is still occurring after the executed CCA. Apparent violations were observed. See Summary of Apparent Violation(s) table below:

Summary of Apparent Violation(s)			
Status	Date	Violation	Narrative
Continuing	7/3/2024	21(a)	Cause or allow open dumping
Continuing	7/3/2024	21(d)(1)	Conduct a waste storage, treatment, or disposal operation without a permit or in violation of a permit
Continuing	7/3/2024	21(p)(1)	Cause or allow open dumping of any waste in a manner which results in litter
Continuing	7/3/2024	21(p)(3)	Cause or allow open dumping of any waste in a manner which results in open burning
Continuing	7/3/2024	21(p)(7)	Cause or allow open dumping of any waste in a manner which results in deposition of general or clean construction or demolition debris
Continuing	7/3/2024	9(a)	Cause, threaten or allow air pollution in Illinois
Continuing	7/3/2024	9(c)	Cause or allow open burning

Attachment Listing

Type	Description
NONE	

Site Map



Legend

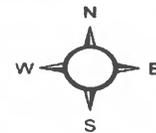
- Site Waypoint
- ⑥ ↗ Photograph & Direction

ILLINOIS EPA SITE MAP

2030205038 - Grainland Cooperative
927 County Highway 3
Eureka, IL 61530
Woodford County

INSPECTION DATE: 04/09/2025
INSPECTOR: NATHAN J GRAHAM

0 25 50 100 150 200
Meters



Digital Photographs



Bureau Id: 2030205038
Photo No.: 1
Photo Date: 4/9/2025
Photo Time: 11:01:43 AM
Direction: NW
Taken By: Nathan Graham

This photograph depicts the entrance to the main office as observed from County Highway 3.



Bureau Id: 2030205038
Photo No.: 2
Photo Date: 4/9/2025
Photo Time: 11:07:23 AM
Direction: E
Taken By: Nathan Graham

This photograph depicts the area where open-dumped and open-burn solid waste was located and is now clean.



Bureau Id: 2030205038
Photo No.: 3
Photo Date: 4/9/2025
Photo Time: 11:07:55 AM
Direction: ESE
Taken By: Nathan Graham

This photograph depicts the area where open-dumped and open-burn solid waste was located and is now clean.



Bureau Id: 2030205038
Photo No.: 4
Photo Date: 4/9/2025
Photo Time: 11:11:51 AM
Direction: S
Taken By: Nathan Graham

This photograph depicts an area of open-dumped solid waste with evidence of open-burned solid waste comprised of charred wood, railroad ties, and landscape waste.



Bureau Id: 2030205038
Photo No.: 5
Photo Date: 4/9/2025
Photo Time: 11:12:34 AM
Direction: N
Taken By: Nathan Graham

This photograph depicts an area of open-dumped solid waste with evidence of open-burned solid waste comprised of charred wood, railroad ties, and landscape waste.



Bureau Id: 2030205038
Photo No.: 6
Photo Date: 4/9/2025
Photo Time: 11:15:52 AM
Direction: S
Taken By: Nathan Graham

This photograph depicts an area of open-dumped solid waste comprised of wood, rebar, metal piping, and landscape waste.



Bureau Id: 2030205038

Photo No.: 7

Photo Date: 4/9/2025

Photo Time: 11:16:56 AM

Direction: N

Taken By: Nathan Graham

This photograph depicts an area of open-dumped solid waste comprised of dirt and general construction/ demolition debris including but not limited to concrete with protruding rebar, brick, and wiring.



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

IN THE MATTER OF: IEPA DOCKET NO.

ILLINOIS ENVIRONMENTAL
PROTECTION AGENCY,
Complainant

vs.

Terry Bline,
Respondent

AFFIDAVIT

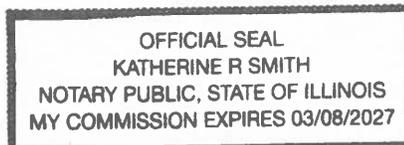
Affiant, Nathan Graham, being first duly sworn, voluntarily deposes and states as follows:

1. Affiant is a field inspector employed by the Bureau of Land of the Illinois Environmental Protection Agency and has been so employed at all times pertinent hereto.
2. On April 09, 2025, between 1058 hours and 1119 hours. Affiant conducted an inspection of the site in Woodford County, Illinois, known as Grainland Cooperative, located at 927 County Highway 3, and designated Bureau of Land Site # 2030205038.
3. Affiant inspected said site by an on-site inspection, which included walking the site.
4. As a result of the activities referred to in Paragraph 3 above, Affiant completed the Inspection Report 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 site.

Subscribed and Sworn to before me
this 14 day of April, 2025


Nathan Graham


Notary Public



2125 S. First Street, Champaign, IL 61820 (217) 278-5800
115 S. LaSalle Street, Suite 2203, Chicago, IL 60603
1101 Eastport Plaza Dr., Suite 100, Collinsville, IL 62234 (618) 346-5120
9511 Harrison Street, Des Plaines, IL 60016 (847) 294-4000

595 S. State Street, Elgin, IL 60123 (847) 608-3131
2309 W. Main Street, Suite 116, Marion, IL 62959 (618) 993-7200
412 SW Washington Street, Suite D, Peoria, IL 61602 (309) 671-3022
4302 N. Main Street, Rockford, IL 61103 (815) 987-7760

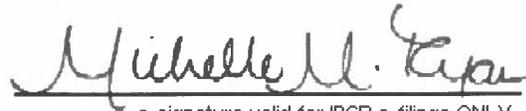
PROOF OF SERVICE

I hereby certify that I did on the 28th day of May 2025, serve with postage thereon prepaid, by depositing in a United States Post Office box a true and correct copy of the following instrument(s) entitled ADMINISTRATIVE CITATION, AFFIDAVIT, and OPEN DUMP INSPECTION CHECKLIST

To: Grainland Farmers
c/o Terry Lee Bline
1861 State Route 116
Roanoke, IL 61561-7759

and the original via electronic filing on May 28, 2025

To: Don Brown, Clerk
Pollution Control Board
60 E. Van Buren St., Ste. 630
Chicago, IL 60605



e-signature valid for IPCB e-filings ONLY

Michelle M. Ryan
Assistant Counsel

Illinois Environmental Protection Agency
2520 West Iles Avenue
P.O. Box 19276
Springfield, Illinois 62794-9276
(217) 782-5544