

ILLINOIS POLLUTION CONTROL BOARD  
June 26, 2025

ILLINOIS ENVIRONMENTAL )  
PROTECTION AGENCY, )  
 )  
Complainant, )  
 )  
v. ) AC 25-5  
 ) (IEPA No. 62-25-AC)  
MITCHELL A. GRAY, ) (Administrative Citation)  
 )  
Respondent. )

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

On April 22, 2025, the Illinois Environmental Protection Agency timely filed an administrative citation against Mitchell A. Gray.<sup>1</sup> *See* 415 ILCS 5/31.1(c) (2024); 35 Ill. Adm. Code 101.300(b), 108.200(b)(3). The administrative citation concerns a facility operated by Mitchell A. Gray at 318 South 5th Street SW, Clay City, Clay County. The property is commonly known to the Illinois Environmental Protection Agency (IEPA) as the Cox, Jeffrey and Rhonda site and is designated with Site Code No. 0250055030. For the reasons below, the Board finds that Mitchell A. Gray violated the Environmental Protection Act (Act) (415 ILCS 5 (2024)) and orders him 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 IEPA 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 108.

In this case, the IEPA alleges that on March 3, 2025, Mitchell A. Gray violated provisions of Sections 21(p)(1) and (p)(7) and 55(k)(1) of the Act (415 ILCS 5/21(p)(1), 21(p)(7), 55(k)(1) (2024)) by causing or allowing open dumping of waste in a manner resulting in litter, depositing of general construction or demolition debris or clean construction or demolition debris, and causing or allowing water to accumulate in used or waste tires. IEPA asks the Board to impose the statutory \$1,500 civil penalty per violation on Mitchell A. Gray, for a total civil penalty of \$4,500. As required, the IEPA served Mitchell A. Gray with the administrative citation on April 25, 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

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<sup>1</sup> The citation originally listed Jeffrey A. Cox and Rhonda E. Cox as respondents, but on May 15, 2025, the Board granted IEPA’s motion to withdraw this citation as to the two of them.

so, the Board must find that the respondent committed the violations alleged and impose the corresponding civil penalty. *See* 415 ILCS 5/31.1(d)(1) (2024); 35 Ill. Adm. Code 101.300(b), 108.204(b), 108.406. Here, any petition for review was due by June 6, 2025. Mitchell A. Gray failed to timely file a petition. Accordingly, the Board finds that Mitchell A. Gray violated Section 21(p)(1) and (p)(7) and 55(k)(1) of the Act (415 ILCS 5/21(p)(1), 21(p)(7), 55(k)(1) (2024)).

The civil penalty for violating any provision of Section 21(p) or 55(k) 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 55(k) 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 Mitchell A. Gray violated Section 21(p)(1), 21(p)(7), and 55(k)(1) of the Environmental Protection Act (415 ILCS 5/21(p)(1), 21(p)(7), 21(k)(1) (2024)).
2. Mitchell A. Gray must pay a civil penalty of \$4,500 no later than Monday, July 28, 2025, which is the first business day following the 30th day after the date of this order. Mitchell A. Gray 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. Mitchell A. Gray 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.

<b>Names and Addresses for Receiving Service of Any Petition for Review Filed with the Appellate Court</b>	
<b>Parties</b>	<b>Board</b>
Illinois Environmental Protection Agency Attn: Michelle M. Ryan, Assistant Counsel 2520 W Iles Ave. P.O. Box 19276 Springfield, IL 62794 Michelle.ryan@illinois.gov	Illinois Pollution Control Board Attn: Don A. Brown, Clerk 60 East Van Buren Street, Suite 630 Chicago, Illinois 60601 don.brown@illinois.gov
Mitchell A. Gray 225 S. 5th Street SW Clay City, IL 62824	

I, Don A. Brown, Clerk of the Illinois Pollution Control Board, certify that the Board adopted the above opinion and order on June 26, 2025, by a vote of 5-0.



Don A. Brown, Clerk  
 Illinois Pollution Control Board

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

ILLINOIS ENVIRONMENTAL	)	
PROTECTION AGENCY,	)	
	)	
	)	
Complainant,	)	AC 2025-
	)	
v.	)	(IEPA No. 62-25-AC)
	)	
JEFFREY A. COX, RHONDA E. COX,	)	
and MITCHELL A. GRAY,	)	
	)	
Respondents.	)	
	)	

**NOTICE OF FILING**

To: Jeffrey A. and Rhonda E. Cox  
318 South 5<sup>th</sup> Street SW  
Clay City, IL 62824

Mitchell A. Gray  
225 South 5<sup>th</sup> Street SW  
Clay City, IL 62824

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: April 22, 2025

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

ADMINISTRATIVE CITATION

ILLINOIS ENVIRONMENTAL	)	
PROTECTION AGENCY,	)	
	)	
Complainant,	)	AC 2025-
	)	
v.	)	(IEPA No 62-25-AC)
	)	
JEFFREY A. COX, RHONDA E. COX, and	)	
MITCHELL A. GRAY,	)	
	)	
Respondents.	)	

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 Jeffrey A. and Rhonda E. Cox are the current owners (“Respondents”) of a facility located at 318 South 5<sup>th</sup> Street SW, Clay City, Clay County, Illinois. The property is commonly known to the Illinois Environmental Protection Agency as Cox, Jeffrey and Rhonda. The facility operator is Mitchell A. Gray, 225 South 5<sup>th</sup> Street SW, Clay City, Clay County, Illinois.
2. That said facility is designated with Site Code No. 0250055030.
3. That Respondents have owned and operated said facility at all times pertinent hereto.
4. That on March 3, 2025, Garrison Gross of the Illinois Environmental Protection Agency’s (“Illinois EPA”) Marion Regional Office inspected the above-described facility. A copy

of the inspection report setting forth the results of said inspection is attached hereto and made a part hereof.

5. That on April 22, 2025, Illinois EPA sent this Administrative Citation to Jeffrey A. and Rhonda E. Cox via Certified Mail No. 7015 0640 0005 6905 7982, and to Mitchell A. Gray via Certified Mail No. 7015 0640 0005 6905 7975.

#### VIOLATIONS

Based upon direct observations made by Garrison Gross during the course of the March 3, 2025 inspection of the above-named facility, the Illinois Environmental Protection Agency has determined that Respondents have violated the Illinois Environmental Protection Act (hereinafter, the "Act") as follows:

- (1) That Respondents 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 Respondents 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).
- (3) That Respondents caused or allowed water to accumulate in used or waste tires, a violation of Section 55(k)(1) of the Act, 415 ILCS 55(k)(1) (2024).

#### CIVIL PENALTY

Pursuant to Section 42(b)(4-5) of the Act, 415 ILCS 5/42(b)(4-5) (2024), Respondents are subject to a civil penalty 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 Respondents elect not to petition the Illinois Pollution Control Board, the statutory civil penalty specified above shall be due and payable no later than June 6, 2025, unless otherwise provided by order of the Illinois Pollution Control Board.

If Respondents elect 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, Respondents 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 Respondents fail to petition or elect 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, Respondents' 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, Respondents 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 Respondents 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 Respondents in Circuit Court to collect said penalty and/or hearing costs, plus any interest accrued.

PROCEDURE FOR CONTESTING THIS  
ADMINISTRATIVE CITATION

Respondents have 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 Respondents elect to contest this Administrative Citation, then Respondents shall file a signed Petition for Review, including a Notice of Filing, Certificate of Service, and Notice of Appearance, with the Clerk of the Illinois Pollution Control Board, State of Illinois Center, 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 Respondents.



\_\_\_\_\_  
Andrew Armstrong, Chief Legal Counsel  
Illinois Environmental Protection Agency

Date: 04/17/2025

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

REMITTANCE FORM

ILLINOIS ENVIRONMENTAL )  
PROTECTION AGENCY, )  
 )  
Complainant, ) AC 2025-  
 )  
v. )  
 ) (IEPA No 62-25-AC)  
JEFFREY A. COX, RHONDA E. COX, and )  
MITCHELL A. GRAY, )  
 )  
 )  
Respondents. )

FACILITY: Clay City/Cox, Jeffrey & Rhonda

SITE CODE NO.: 0250055030

COUNTY: Clay

CIVIL PENALTY: \$4,500.00

DATE OF INSPECTION: March 3, 2025

DATE REMITTED:

SS/FEIN NUMBER:

SIGNATURE:

NOTE

Please enter the date of your remittance, your Social Security number (SS) if an individual or Federal Employer Identification Number (FEIN) if a corporation and sign this Remittance Form. Be sure your check is enclosed and mail, along with Remittance Form, to Illinois Environmental Protection Agency, Attn.: Fiscal Services, P.O. Box 19276, Springfield, Illinois 62794-9276.

Illinois Environmental Protection Agency

Bureau of Land – Field Operations Section

**Inspection Report**

**General Facility Information**

<b>BOL ID</b>	0250055030	<b>Evaluation Date</b>	3/3/2025
<b>USEPA Id</b>	N/A	<b>Region</b>	Marion
<b>Site Name</b>	Cox, Jeffrey and Rhonda	<b>County</b>	Clay
<b>Address</b>	225 S. 5th Street SW	<b>Phone</b>	618-843-2013
<b>City/State/Zip</b>	Clay City, IL 62824	<b>EJ Status</b>	None
<b>Limited English</b>	<input type="checkbox"/>	<b>Primary Language</b>	English

**Observations**

<b>Time</b>	10:29 - 10:36
<b>Weather Conditions</b>	clear skies, moderate breeze, muddy surface
<b>Temperature</b>	47° Fahrenheit
<b>Photos Taken</b>	Yes (14)
<b>Amount of Waste</b>	~20 cubic yards
<b>Number of Tires</b>	13 tires

**Evaluation Type**

Solid Waste Program - Open Dump Inspection

**Owner**

Jeffery & Rhonda Cox  
318 S. 5th Street SW  
Clay City, IL 62824

**Operator**

Mitchell A. Gray  
225 S. 5th Street SW  
Clay City, IL 62824

**Inspection Participants**

<u>Person</u>	<u>Affiliation</u>	<u>Phone</u>
Garrison Gross	IEPA FOS Primary Inspector	(618) 993-7254

**Persons Interviewed**

<u>Person</u>	<u>Phone</u>	<u>E-Mail</u>
N/A		

**Executive Summary**

On Monday, March 3, 2025, I (Garrison Gross) conducted a follow-up open dump site inspection at the Cox, Jeffrey and Rhonda site. The last inspection was conducted on December 14, 2023. The site is located at 225 South 5th Street SW, Clay City, Illinois 62824. No one answered the door. The inspection was performed to evaluate the compliance status after the issuance of Violation Notices on June 20, 2023. Fourteen photographs were taken. Apparent violations were found and are discussed below.

***Evaluation Narrative***

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**Site History:** The site was initially inspected on April 14, 2022 based on complaint #4901 which alleged open dumping of tires. An Administrative Citation Warning Notice (ACWN) was issued to Jeffery A. & Rhonda E. Cox on May 10, 2022 for open dumping of used or waste tires, household wastes, and water in tires. A follow-up inspection was conducted on September 7, 2022 and a Continuing Violations Letter was sent on September 29, 2022. The site was reinspected on April 17, 2023. Violation Notice (VN) letters were issued to Jeffery A. & Rhonda E. Cox on June 20, 2023. Open burning and demolition debris were added as new alleged violations. No one responded to the VN within the 45-day period.

On August 16, 2023, Mitchell Gray called me and said he had been living at the site for several years. He reported he was related to Mr. and Mrs. Cox and they lived a few houses down the street to the west. He said he was working on getting the site cleaned up and intended to take some waste items from the back yard to a city clean up. Mr. Gray emailed on October 11, 2023 and reported old furniture and junk had been hauled to city dumpsters. On December 14, 2023, I conducted a follow-up inspection and found similar site conditions. VNs were issued to Mitchell Gray, Jeffery Cox, and Rhonda Cox on January 18, 2024. No one responded to the VNs and Notice on Non-Issuance letters were mailed to the responsible parties on March 19, 2024.

**Follow-up Inspection Findings:** I arrived at the site and observed several 4-wheelers and a side-by-side parked along the edge of the property (photo 1). A utility trailer was parked in the back yard which had several pallets stacked on it (photo 2). A stack of extralong pallets were observed near the garage (photo 14). Pallets do not appear to be generated onsite. I observed the area along the privacy fence, and it appeared most of the used or waste tires had been removed from the fence and the shed (photo 3). Two off-rim tires, a 4-wheeler frame, and a vehicle seat remained in this area (photo 3). A new pile of cut lumber was dumped next to the green shed (photo 4). It appeared some of the mattresses and household trash had been removed from the fenced-in side of the yard (photo 5). One mattress had been placed on top of what appeared to be a covered animal enclosure. Six off-rim tires were observed next to the garage (photo 6). Some of the tires had accumulated water (photo 7).

Household items remained in piles between the garage and sidewalk (photo 8), and the garage and house (photo 9). These items include but are not limited to plastic containers, PVC pipe, cardboard boxes, furniture, cloth items, metal fencing, bed frame, metal racks, all-terrain vehicle, and parts. Demolition debris including lumber and weathered plywood was observed next to the house (photo 10). Pieces of cut lumber were observed next to the garage (photo 11). Four all-terrain vehicle tires were stacked next to the green shed (photo 12). These tires were on rim and holding air. It appeared a metal burn ring had been used for open burning since the last inspection based on photograph comparisons (photo 13).

<b>Summary of Apparent Violation(s)</b>			
<b>Status</b>	<b>Date</b>	<b>Violation</b>	<b>Narrative</b>
Continuing	4/14/2022	21(a)	Cause or allow open dumping
Continuing	4/14/2022	21(d)(1)	Conduct a waste storage, treatment, or disposal operation without a permit
Continuing	4/14/2022	21(e)	Dispose, treat, store, abandon any waste, or transport any waste into Illinois at or to sites not meeting requirements of the Act
Continuing	4/14/2022	21(p)(1)	Cause or allow open dumping of any waste in a manner which results in litter
Continuing	4/14/2022	55(a)(1)	Cause or allow open dumping of any used or waste tire
Continuing	4/14/2022	55(k)(1)	Cause or allow water to accumulate in used or waste tires
Continuing	4/17/2023	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

***Attachment Listing***

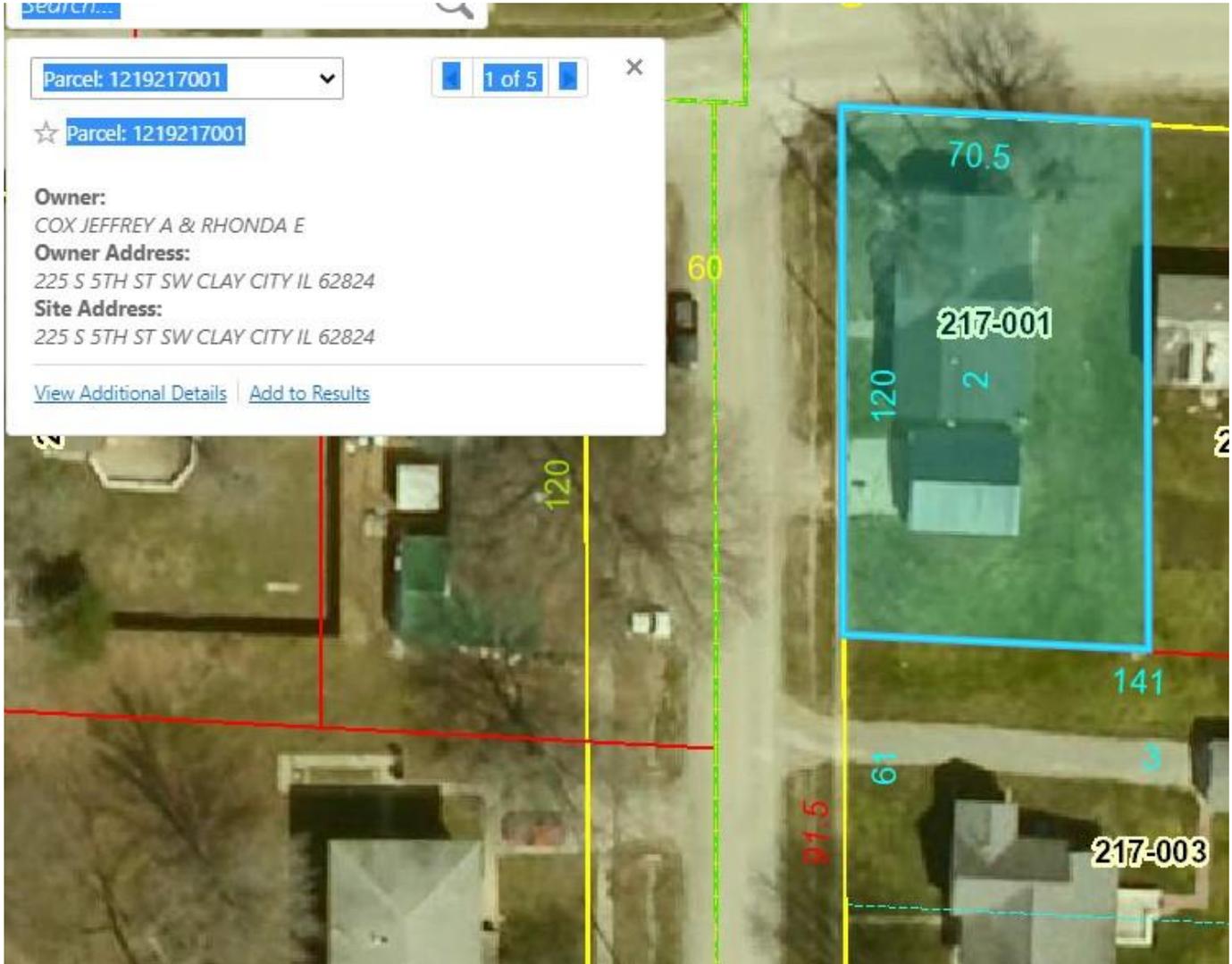
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<b>Type</b>	<b>Description</b>
N/A	

Site Diagram

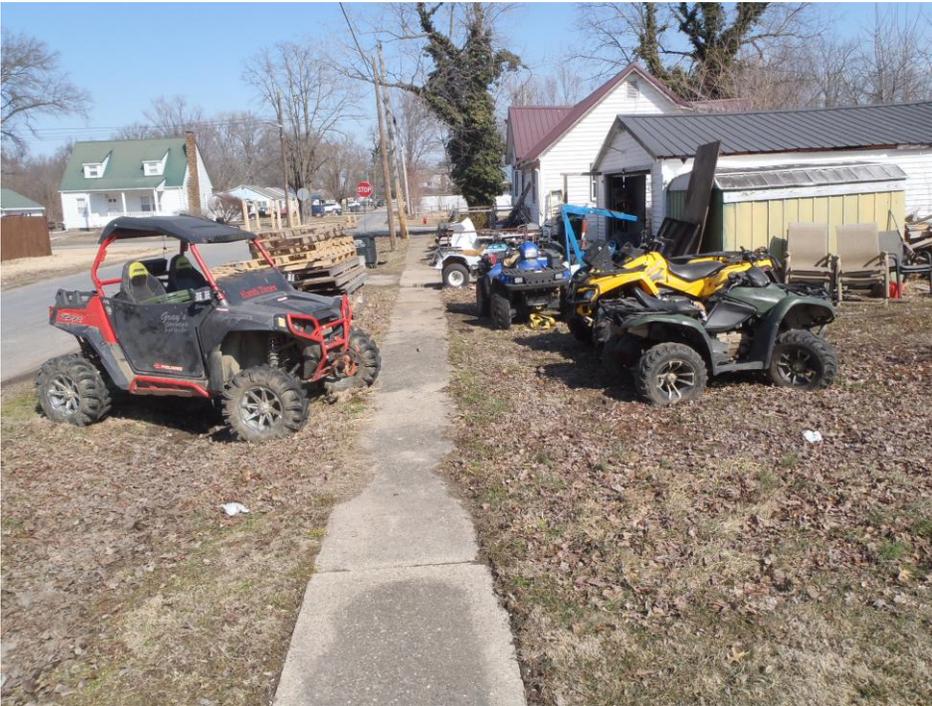


0250055030





Digital Photographs



Bureau Id: 0250055030  
Photo No.: 1  
Photo Date: 3/3/2025  
Photo Time: 10:31:51 AM  
Direction: north  
Taken By: Garrison Gross

Photograph of 4-wheelers and a side-by-side parked near the garage.



Bureau Id: 0250055030  
Photo No.: 2  
Photo Date: 3/3/2025  
Photo Time: 10:32:03 AM  
Direction: north  
Taken By: Garrison Gross

A utility trailer loaded with wooden pallets.



Bureau Id: 0250055030  
Photo No.: 3  
Photo Date: 3/3/2025  
Photo Time: 10:32:25 AM  
Direction: north  
Taken By: Garrison Gross

Two used or waste tires, 4-wheeler frame, and automotive seat remained along the privacy fence.



Bureau Id: 0250055030  
Photo No.: 4  
Photo Date: 3/3/2025  
Photo Time: 10:32:43 AM  
Direction: north  
Taken By: Garrison Gross

A pile of cut pieces of lumber.



Bureau Id: 0250055030  
Photo No.: 5  
Photo Date: 3/3/2025  
Photo Time: 10:32:59 AM  
Direction: north  
Taken By: Garrison Gross

Household trash remaining in the side yard. Some waste items had been removed from this area.



Bureau Id: 0250055030  
Photo No.: 6  
Photo Date: 3/3/2025  
Photo Time: 10:33:32 AM  
Direction: east  
Taken By: Garrison Gross

Off-rim used or waste tires. Some of the tires had accumulated water.



Bureau Id: 0250055030  
Photo No.: 7  
Photo Date: 3/3/2025  
Photo Time: 10:33:37 AM  
Direction: east  
Taken By: Garrison Gross

Water in tire.



Bureau Id: 0250055030  
Photo No.: 8  
Photo Date: 3/3/2025  
Photo Time: 10:33:53 AM  
Direction: east  
Taken By: Garrison Gross

Waste items piled up next to garage and house (plastic containers, plastic pipe, insulating bubble wrap, and old 4-wheeler.



Bureau Id: 0250055030  
Photo No.: 9  
Photo Date: 3/3/2025  
Photo Time: 10:33:59 AM  
Direction: east  
Taken By: Garrison Gross

Waste items piled up between house and garage (plastic containers, off-rim tire, fence panel, cloth items, metal rack, and bed frame).



Bureau Id: 0250055030  
Photo No.: 10  
Photo Date: 3/3/2025  
Photo Time: 10:34:06 AM  
Direction: east  
Taken By: Garrison Gross

Waste items piled up next to house (weathered plywood, lumber, and gutter).



Bureau Id: 0250055030  
Photo No.: 11  
Photo Date: 3/3/2025  
Photo Time: 10:34:20 AM  
Direction: east  
Taken By: Garrison Gross

Waste pile next to green shed (cut pieces of lumber).



Bureau Id: 0250055030  
Photo No.: 12  
Photo Date: 3/3/2025  
Photo Time: 10:34:28 AM  
Direction: east  
Taken By: Garrison Gross

Used or waste tires (on-rim 4-wheeler tires).



Bureau Id: 0250055030  
Photo No.: 13  
Photo Date: 3/3/2025  
Photo Time: 10:34:50 AM  
Direction: north  
Taken By: Garrison Gross

Burn ring appeared to have been used since the last inspection.



Bureau Id: 0250055030  
Photo No.: 14  
Photo Date: 3/3/2025  
Photo Time: 10:36:37 AM  
Direction: south  
Taken By: Garrison Gross

Extralong pallets stacked next to the garage and driveway.



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

IN THE MATTER OF:

IEPA DOCKET NO.

ILLINOIS ENVIRONMENTAL  
PROTECTION AGENCY,  
Complainant

vs.

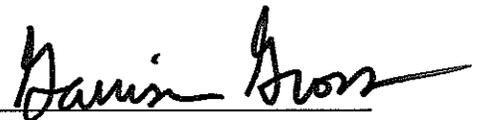
Jeffrey Cox & Rhonda Cox,  
Respondent

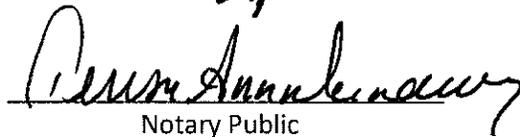
AFFIDAVIT

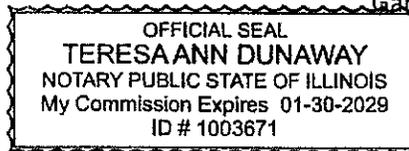
Affiant, Garrison Gross, being first duly sworn, voluntarily deposes and states as follows:

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 March 3, 2025, between 10:29 and 10:36, Affiant conducted an inspection of the site in Clay County, Illinois, known as Clay City/Cox, Jeffrey/Rhonda, located at 225 South 5<sup>th</sup> Street SW, Clay City, Illinois 62824, and designated Bureau of Land Site # 0250055030.
3. Affiant inspected said site by an on-site inspection, which included walking and photographing 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 2 day of April 2025.

  
Garrison Gross

  
Notary Public





ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

IN THE MATTER OF:

IEPA DOCKET NO.

ILLINOIS ENVIRONMENTAL  
PROTECTION AGENCY,  
Complainant

vs.

Mitchell Gray,  
Respondent

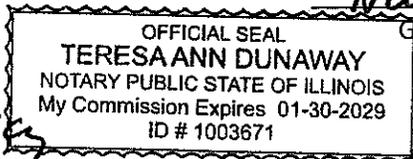
AFFIDAVIT

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3. Affiant inspected said site by an on-site inspection, which included walking and photographing 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 2 day of April 2025.

*Teresa Ann Dunaway*  
Notary Public



*Garrison Gross*  
Garrison Gross

**PROOF OF SERVICE**

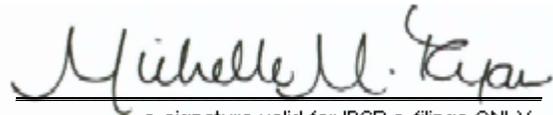
I hereby certify that I did on the 22<sup>nd</sup> day of April 2025, serve with postage thereon prepaid, by depositing in a United States Post Office box a true and correct copy of the following instrument(s) entitled ADMINISTRATIVE CITATION, AFFIDAVIT, and OPEN DUMP INSPECTION CHECKLIST

To: Jeffrey A. and Rhonda E. Cox  
318 South 5<sup>th</sup> Street SW  
Clay City, IL 62824

Mitchell A. Gray  
225 South 5<sup>th</sup> Street SW  
Clay City, IL 62824

and the original via electronic filing on April 22, 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