

**BEFORE THE POLLUTION CONTROL BOARD  
OF THE STATE OF ILLINOIS**

|  |   |               |
|--|---|---------------|
| PIA AVCENTER LLC d/b/a BYLERLY AVIATION, | ) |               |
| Petitioner,                              | ) |               |
| v.                                       | ) | PCB 2024-078  |
|  | ) | (LUST Appeal) |
| ILLINOIS ENVIRONMENTAL                   | ) |               |
| PROTECTION AGENCY,                       | ) |               |
| Respondent.                              | ) |               |

**NOTICE**

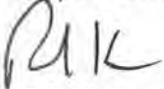
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**PLEASE TAKE NOTICE** that I have today filed with the office of the Clerk of the Pollution Control Board **ILLINOIS EPA'S CROSS MOTION FOR SUMMARY JUDGMENT OR IN THE ALTERNATIVE RESPONSE TO PETITIONER'S MOTION OF SUMMARY JUDGMENT**, copies of which are herewith served upon you.

Respectfully submitted,  
ILLINOIS ENVIRONMENTAL PROTECTION AGENCY,  
Respondent



Rich Kim  
Assistant Counsel/Special Assistant Attorney General  
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Dated: March 17, 2026

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| Respondent.                              | ) |               |

**ILLINOIS EPA'S CROSS MOTION FOR SUMMARY JUDGMENT OR IN THE ALTERNATIVE RESPONSE TO PETITIONER'S MOTION FOR SUMMARY JUDGMENT**

**NOW COMES** the Respondent, the Illinois Environmental Protection Agency ("Illinois EPA" or "Agency"), by one of its attorneys, Rich Kim, Assistant Counsel and Special Assistant Attorney General, and hereby submits **ILLINOIS EPA'S CROSS MOTION FOR SUMMARY JUDGMENT OR IN THE ALTERNATIVE RESPONSE TO PETITIONER'S MOTION FOR SUMMARY JUDGMENT** to the Illinois Pollution Control Board ("Board").

**I. STANDARD FOR ISSUANCE AND REVIEW**

A motion for summary judgment should be granted where the pleadings, depositions, admissions on file, and affidavits disclose no genuine issue as to any material fact and the moving party is entitled to judgment as a matter of law. Dowd & Dowd, Ltd. v. Gleason, 181 Ill.2d 460, 483, 693 N.E.2d 358, 370 (1998); McDonald's Corporation v. Illinois Environmental Protection Agency, PCB 04-14 (January 22, 2004), p. 2.

Section 57.8(i) of the Illinois Environmental Protection Act ("Act") (415 ILCS 5/57.8(i)) grants an individual the right to appeal a determination of the Illinois EPA to the Board pursuant to Section 40 of the Act (415 ILCS 5/40). Section 40 of the Act, the general appeal section for permits, has been used by the legislature as the basis for this type of appeal to the Board. Thus, when reviewing an

Illinois EPA determination of ineligibility for reimbursement from the Underground Storage Tank Fund, the Board must decide whether the application, as submitted, demonstrates compliance with the Act and Board regulations. Rantoul Township High School District No. 193 v. Illinois EPA, PCB 03-42 (April 17, 2003), p. 3.

In deciding whether the Illinois EPA's decision under appeal here was appropriate, the Board must look to the documents within the Administrative Record ("AR"). The Illinois EPA asserts that the Record as filed by the Agency and the arguments presented in this motion are sufficient for the Board to enter a dispositive order in favor of the Illinois EPA on all relevant issues. Accordingly, the Illinois EPA respectfully requests that the Board enter an order granting the Illinois EPA summary judgement.

## II. BURDEN OF PROOF

Pursuant to Section 105.112(a) of the Board's procedural rules (35 Ill. Adm. Code 105.112(a)), the burden of proof shall be on the petitioner. In reimbursement appeals, the burden is on the applicant for reimbursement to demonstrate that the costs incurred are related to corrective action, properly accounted for, and reasonable. Rezmar Corporation v. Illinois EPA, PCB 02-91 (April 17, 2003), p. 9.

## III. LAW

415 ILCS 5/57.1 Applicability.

- (a) An owner or operator of an underground storage tank who meets the definition of this Title shall be required to conduct tank removal, abandonment and repair, site investigation, and corrective action in accordance with the requirements of the Leaking Underground Storage Tank Program.

415 ILCS 5/57.7(c) Agency review and approval.

(3) In approving any plan submitted pursuant to subsection (a) or (b) of this Section, the Agency shall determine, by a procedure promulgated by the Board under Section 57.14, that the costs associated with the plan are reasonable, will be incurred in the performance of site investigation or corrective action, and will not be used for site investigation or corrective action activities in excess of those required to meet the minimum requirements of this Title. The Agency shall also determine, pursuant to the Project Labor Agreements Act, whether the corrective action shall include a project labor agreement if payment from the Underground Storage Tank Fund is to be requested.

415 ILCS 5/57.8 Underground Storage Tank Fund; payment; options for State payment; deferred correction election to commence corrective action upon availability of funds.

(k) The Agency shall not pay costs of corrective action or indemnification incurred before providing notification of the release of petroleum in accordance with the provisions of this Title.

415 ILCS 5/57.9 Underground Storage Tank Fund; eligibility and deductibility.

(a) The Underground Storage Tank Fund shall be accessible by owners and operators who have a confirmed release from an underground storage tank or related tank system of a substance listed in this Section. The owner or operator is eligible to access the Underground Storage Tank Fund if the eligibility requirements of this Title are satisfied and...

35 Ill. Adm. Code 734.630 Ineligible Corrective Action Costs

Costs ineligible for payment from the Fund, include, but are not limited to:

- k) Costs for removal, disposal, or abandonment of a UST if the tank was removed or abandoned, or permitted for removal or abandonment, by the OSFM before the owner or operator provided notice to IEMA of a release of petroleum;
- o) Costs for corrective action activities and associated materials or services exceeding the minimum requirements necessary to comply with the Act;

- cc) Costs that lack supporting documentation;
- ee) Costs incurred during early action that are unreasonable.

35 Ill. Adm. Code Section 734.635 Payment for Handling Charges

Handling charges are eligible for payment only if they are equal to or less than the amount determined by the following table:

| Subcontract or Field<br>Purchase Cost: | Eligible Handling Charges<br>as a Percentage of Cost: |
|--|---|
| \$0 - \$5,000.....                     | 12%   |
| \$5,001 - \$15,000.....                | \$600 + 10% of amt. over \$5,000                      |
| \$15,001 - \$50,000.....               | \$1,600 + 8% of amt. over \$15,000                    |
| \$50,001 - \$100,000.....              | \$4,400 + 5% of amt. over \$50,000                    |
| \$100,001 - \$1,000,000.....           | \$6,900 + 2% of amt. over \$100,000                   |

41 Ill. Adm. Code Section 178.100 Definitions

“Confirmed release” means a release that has been confirmed by soil sampling that produces lab results above lab reporting limits for the requisite indicator contaminants specified in the procedures found at 41 Ill. Adm. Code 178.330.

**IV. FACTS**

PIA AvCenter LLC d/b/a Byerly Aviation (“Petitioner”), located at 6100 Dirksen Parkway in Peoria, Peoria County, Illinois, is a commercial aviation business at the Peoria International Airport (“PIA”) which provides aviation fuel, jet fuel and gasoline for airport activities. (AR 104).

On July 14, 2015, the Office of the Illinois State Fire Marshall (“OSFM”) issued a Permit for Removal for five underground storage tanks owned and operated by Petitioner, one 3000 gallon gasoline tank (TK#1), one 17,500 gallon aviation fuel tank (TK#2), two 15,000 gallon aviation fuel tanks (TK#3, 4), and one 20,000 gallon gasoline tank (TK#5). (AR1).

On January 11, 2019, OSFM issued a Record of Red Tag for Tank 3, a 15,000 gallon jet fuel tank, based upon a Notice of Violation (E0020173135) dated November 15, 2017. (AR2-AR3). In the Remarks section it stated: "Chuck Adkins has been notified of the red tag and current status. He is working with Illinois Oil marketing to remove all UST's. This red tag was issued remotely due to time constraints." (AR2).

On November 17, 2021, OSFM issued a Record of Red Tag for Tank 1 - a 3,000 gallon gasoline tank, Tank 2 - a 17,500 gallon aviation fuel tank, tank 4 - a 15,000 gallon aviation fuel tank, and Tank 5 - a 20,000 gallon gasoline tank, based upon a Notice of Violation (E0020210748) dated March 26, 2021. (AR4-AR5). The next day, on November 18, 2021, the Record of Red Tag was removed for those four underground tanks. (AR6). In the Remarks section it stated: "Under the direction of Scott Johnson on today's date, these red flags were removed. Facility is sending further documentation to OSFM concerning the pending removal of these tanks." (Id.)

On November 22, 2021, Scott Johnson, OSFM Statewide Administrator, issued a Memorandum stating as follows: "On 3/26/2021 Jim Coffey erroneously placed red tags on tanks 1, 2, 4, and 5. On 3/27/2021, I advised Jim to remove these red tags as Byerly Aviation has been working these issues in good faith. Due to Covid, FAA requirements and equipment delays this project has continued for multiple years. It is currently scheduled to be completed in February 2022 and all underground storage tanks will be removed and replaced with one aboveground bulk storage tank." (AR7).

On January 31, 2023, OSFM reissued the Record of Red Tag for Tank 1 - a 3,000 gallon gasoline tank, Tank 2 - a 17,500 gallon aviation fuel tank, tank 4 - a 15,000 gallon aviation fuel tank,

and Tank 5 – a 20,000 gallon gasoline tank, based upon a Notice of Violation (E0020210748). (AR8-AR9).

On August 3, 2023, at 4:00 PM, a suspected release from four underground storage tanks was discovered, specifically one 17,500 gallon aviation fuel tank, one 15,000 gallon aviation fuel tank, one 15,000 jet fuel tank and one 20,000 gasoline tank. (AR10-AR11). The release was reported by Jeff Weinhoff of Green Wave Consulting (“Green Wave”) the following morning, on August 4, 2023, at 10:08.22 AM and the Illinois Emergency Management Agency (“IEMA”) assigned the releases as Incident Number 2023-0623. (AR10).

On August 7, 2023, Petitioner applied for a permit to remove all five underground storage tanks from OSFM, which issued the permit on the same date. (AR13-AR15). According to the removal permit, Tank #1, a 3,000 premium gasoline condemned tank, was last used on February 18, 2022, Tank #2, a 17,500 gallon out of service aviation fuel tank, was last used on January 31, 2023, Tank #3, a 15,000 gallon condemned Jet A fuel tank, was last used on October 19, 2016, Tank #4, a 15,000 gallon out of service aviation fuel tank, was last used on January 31, 2023, and Tank #5, a 20,000 gallon premium gasoline out of service tank was last used on January 31, 2023. (AR13-AR15). Four of the tanks were removed from August 23, 2023, to August 24, 2023. (AR109).

On September 29, 2023, Petitioner filed its 45-Day Report with the Illinois EPA. (AR101-AR257). In the 45-Day Report, Green Wave indicated as follows: “During a limited subsurface investigation, hydrocarbon impacted soil was found surrounding the underground storage tanks (USTs) system. The investigation indicated a petroleum release around the USTs system through soil sampling.” (AR104). On October 18, 2023, Petitioner applied for an eligibility and deductible

determination from OSFM. (AR262-AR263). On October 25, 2023, OSFM issued a determination approving payment of costs in excess of a \$5,000 deductible. (AR264-AR265).

On January 12, 2024, Petitioner submitted an application for payment of early action costs in the amount of \$224,349.27. (AR357-AR492). On May 1, 2024, the Illinois EPA reviewer emailed Green Wave for additional information/clarification. (AR493-AR495). Green Wave responded to the request on May 6, 2024. (AR496-AR499).

On May 10, 2024, the Illinois EPA approved the application for payment in part, cutting \$37,576.31. (AR500-AR505). The largest deduction (\$31,864.63) was due to the fact the tanks were permitted for removal on July 15, 2015, by OSFM, prior to IEMA reporting on August 4, 2023. (AR502-503). Costs associated with field work performed on August 22, 2023, were deducted in the amount of \$2,842.78. (AR503-AR504). Personnel costs for finalizing the payment application were deducted in the amount of \$710.16 (AR504). Finally, costs associated with handling charges were deducted in the amount of \$2,157.75. (AR504-AR505).

This case was appealed on June 18, 2024, which was accepted by the Board on August 8, 2024.

## V. ARGUMENT

A motion for summary judgement can be granted in favor of the Illinois EPA based upon the Administrative Record and the Board's decision in Abel Investments v. IEPA, PCB 2016-108.

"The Board must decide whether Abel's submittal to IEPA demonstrated compliance with the Act and the Board's rules. Illinois Ayers Oil Co. v. IEPA, PCB 03-214, slip op. at 8 (April 1, 2004); Kathe's Auto Service Center v. IEPA, PCB 96-102, slip op. at 13 (Aug. 1, 1996). The Board's review is generally limited to the record before IEPA at the time of its determination. Freedom Oil Co. v. IEPA, PCB 03-54, 03-56, 03-105, 03179, 04-04 (cons.), slip op. at 11 (Feb. 2, 2006); *see also* Illinois Ayers, PCB 03-214, slip op. at 15 ("the Board does not review [IEPA's] decision using a deferential manifest-weight of

the evidence standard," but "[r]ather the Board reviews the entirety of the record to determine that the [submittal] as presented to [IEPA] demonstrates compliance with the Act").

Further, on appeal before the Board, IEPA's denial letter frames the issue (Karlock v. IEPA, PCB 05-127, slip op. at 7 (July 21, 2005)), and the UST owner or operator has the burden of proof (Ted Harrison Oil v. IEPA, PCB 99-127, slip op. at 5-6 (July 24, 2003); see also 35 Ill. Adm. Code 105.112). The standard of proof in UST appeals is the "preponderance of the evidence." Freedom Oil Co., slip op. at 59 (Feb. 2, 2006), citing McHenry County Landfill, Inc. v. County Bd. of McHenry County, PCB 85-56, 85-61, 85-62, 85-63, 85-64, 85-65, 85-66 (cons.), slip op. at 3 (Sept. 20, 1985) ("A proposition is proved by a preponderance of the evidence when it is more probably true than not.") *Abel at 3*.

There is no genuine issue of material fact. This case is a matter of the application of the law. The Administrative Record in this case was filed on July 9, 2025. A Certificate of Record on Appeal was filed with the Administrative Record wherein, the project manager, certified that "on information and belief that the entire record of the Respondent's decision, as defined in 35 Ill. Adm. Code 105.410(b)" was enclosed.

**1. THE COST OF REMOVING TANKS WERE PROPERLY DEDUCTED ON THE BASIS THAT THE TANKS WERE PERMITTED FOR REMOVAL BY OSFM BEFORE THE OWNER OR OPERATOR PROVIDED NOTICE TO IEMA OF A RELEASE OF PETROLUEUM (\$31,864.63).**

The Agency correctly deducted the cost of removing the tanks based upon the Board's Underground Storage Tank regulations. On July 14, 2015, the Office of the Illinois State Fire Marshall ("OSFM") issued a Permit for Removal for the five underground storage tanks owned and operated by Petitioner - one 3000 gallon gasoline tank (TK#1), one 17,500 gallon aviation fuel tank (TK#2), two 15,000 gallon aviation fuel tanks (TK#3, 4), and one 20,000 gallon gasoline tank (TK#5). (AR1). Petitioner provided notice to IEMA of a potential release of petroleum on August 4, 2023. (AR10-AR12). The Agency's decision letter cited Section 734.630(k), which states:

Costs ineligible for payment of the Fund, include, but are not limited to:

- k) Costs for removal, disposal, or abandonment of a UST if the tank was removed or abandoned, or permitted for removal or abandonment, by the OSFM before the owner or operator provides notice to IEMA of a release of petroleum;

(35 Ill. Adm. Code § 734.630(k)(emphasis added))

In its Motion for Summary Judgment, Petitioner states that the Agency erred in believing that the Petitioner planned to remove the tanks in 2015 and that the only reason it obtained the removal permit in 2015 was in case they failed periodic testing of its tanks. Section 734.630(k) does not provide a carve-out exception for the reason why tanks are permitted for removal. The Record is clear the tanks in question were permitted for removal by OSFM on July 14, 2015. The Board included the “permitted for removal or abandonment” language in Section 734.630(k) for this exact scenario – a planned tank pull. The Record is also clear that the Petitioner intended to remove the tanks for several years after 2015, and prior to the IEMA notification on August 4, 2023.

On January 11, 2019, OSFM issued a Record of Red Tag for Tank 3, a 15,000 gallon jet fuel tank, based upon a Notice of Violation (E0020173135) dated November 15, 2017. (AR2-AR3). In the Remarks section it stated: “Chuck Adkins has been notified of the red tag and current status. He is working with Illinois Oil marketing to remove all UST’s. This red tag was issued remotely due to time constraints.” (AR2 (emphasis added)).

On November 17, 2021, OSFM issued a Record of Red Tag for Tank 1 - a 3,000 gallon gasoline tank, Tank 2 – a 17,500 gallon aviation fuel tank, tank 4 – a 15,000 gallon aviation fuel tank, and Tank 5 – a 20,000 gallon gasoline tank, based upon a Notice of Violation (E0020210748) dated March 26, 2021. (AR4-AR5). The next day, on November 18, 2021, the Record of Red Tag was removed for

those four underground tanks. (AR6). In the Remarks section it stated: "Under the direction of Scott Johnson on today's date, these red flags were removed. Facility is sending further documentation to OSFM concerning the pending removal of these tanks." (Id. (Emphasis added))

On November 22, 2021, Scott Johnson, OSFM Statewide Administrator, issued a Memorandum stating as follows: "On 3/26/2021 Jim Coffey erroneously placed red tags on tanks 1, 2, 4, and 5. On 3/27/2021, I advised Jim to remove these red tags as Byerly Aviation has been working these issues in good faith. Due to Covid, FAA requirements and equipment delays this project has continued for multiple years. It is currently scheduled to be completed in February 2022 and all underground storage tanks will be removed and replaced with one aboveground bulk storage tank." (AR7 (Emphasis added)).

In Petitioner's 45-Day Report, Green Wave indicated as follows: "During a limited subsurface investigation, hydrocarbon impacted soil was found surrounding the underground storage tanks (USTs) system. The investigation indicated a petroleum release around the USTs system through soil sampling. A release was reported to the Illinois Emergency Management Agency (IEMA) on August 4, 2023 and received Leaking Underground Storage Tank (LUST) incident number 20230623 concerning this release incident." (AR104).

However, it should be noted that Green Wave did not include the results of its August 3, 2023 "limited subsurface investigation" in the 45-Day Report, including any bore logs, map of the location of any borings/samplings and any analytical results from a laboratory. Without this information, the owner/operator failed to confirm that a release occurred. A release was not confirmed until analytical data was received from soil samples collected on and after August 23, 2023, when site assessment sampling was performed following tank removal. To meet the definition of a confirmed

release, soil sampling must produce lab results above lab reporting limits for the requisite indicator contaminants; additionally, only owners and operators who have a confirmed release are eligible to access the Underground Storage Tank Fund (41 Ill. Adm. Code § 178.100; 415 ILCS 5/57.9(a)).

Furthermore, the Record shows that Petitioner intended to remove the tanks for several years prior to reporting a release on August 4, 2023. Based on the information, it appears a suspected release was reported on August 4, 2023, for the purpose of obtaining a new removal permit after the IEMA date so tank removal costs would be reimbursed from the Leaking UST Fund. The Agency's decision to deduct \$31,864.63 as costs to remove the tanks was correct when the tanks were permitted for removal by OSFM before Petitioner provided notice of a suspected petroleum release and prior to confirming that release occurred from the associated tanks.

**2. COSTS ASSOCIATED WITH FIELD WORK PERFORMED ON AUGUST 22, 2023 (\$2843.78).**

The Illinois EPA does not object to the Petitioner's argument regarding the costs associated with field work performed on August 22, 2023, in the amount of \$2,843.78. Those deductions should be reinstated.

**3. COSTS ASSOCIATED WITH FINALIZING THE PAYMENT APPLICATION (\$710.15).**

The Illinois EPA does not object to the Petitioner's argument regarding the costs associated with finalizing the payment application in the amount of \$710.15 - \$133.16 for 2 hours for D. Eggleston to assemble and distribute reimbursement claim and \$576.99 for 3 hours for J. Weinhoff to review and certify claim. Those deductions should be reinstated.

**4. COSTS ASSOCIATED WITH HANDLING CHARGES (\$2,157.75).**

"Handling Charges" are the "administrative, insurance, and interest costs and a reasonable profit for procurement, oversight, and payment of subcontracts and field purchases." (35 Ill. Adm.

Code § 734.115). Petitioner requested a total of \$2,797.35 in Handling Charges in its reimbursement package, based upon \$29,966.90.31 in total costs, including \$24,260.00 for UST Removal, \$5,411.00 for soil sample analysis and \$295.90 for wastewater removal/disposal. (AR470). The Agency deducted a total of \$2,157.75 for handling charges. (AR504).

For the reasons given supra, the handling charge deductions for UST Removal and wastewater removal/disposal should be upheld. Also, the handling cost for pH testing on August 22, 2023, should be restored. The resulting eligible handling charges should be \$641.00, not \$639.60. (35 Ill. Adm. Code § 734.635).

**VI. CONCLUSION**

The facts and the law are clear and in favor of the Illinois EPA. Petitioner's payment request to Illinois EPA for the cost of removing tanks where they were permitted for removal by OSFM before notice of a petroleum release to IEMA was provided would violate the Act or the Board's rules. In addition, handling charges for UST removal would also violate the Act or the Board's rules.

**WHEREFORE:** for the above noted reasons, the Illinois EPA respectfully requests the Board (1) **DENY** Petitioner's Motion for Summary Judgment, in part and (2) **GRANT** summary judgment in its favor.

Respectfully submitted,

**ILLINOIS ENVIRONMENTAL PROTECTION AGENCY,**

Respondent



Rich Kim  
Assistant Counsel/Special Assistant Attorney General  
Division of Legal Counsel  
2520 West Iles Avenue  
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217/782-5544  
Dated: March 17, 2026

**CERTIFICATE OF SERVICE**

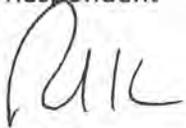
I, the undersigned attorney at law, hereby certify that on March 17, 2026, I served true and correct copies of **ILLINOIS EPA'S CROSS MOTION FOR SUMMARY JUDGMENT OR IN THE ALTERNATIVE RESPONSE TO PETITIONER'S MOTION FOR SUMMARY JUDGMENT** via the Board's COOL system and email, upon the following named persons:

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ILLINOIS ENVIRONMENTAL PROTECTION AGENCY,  
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