

**BEFORE THE ILLINOIS POLLUTION CONTROL BOARD**

PEOPLE OF THE STATE OF ILLINOIS,	)	
by KWAME RAOUL, Attorney General	)	
of the State of Illinois,	)	
	)	
Complainant,	)	
	)	
v.	)	PCB No. 2026-53
	)	
RANDY PETER and DEBRA PETER,	)	
individuals,	)	
	)	
Respondents.	)	
	)	
	)	

**NOTICE OF FILING**

To: See Attached Service List (Via Electronic Filing)

PLEASE TAKE NOTICE that the undersigned filed today with the Office of the Clerk of the Illinois Pollution Control Board by electronic filing the following MOTION FOR RELIEF FROM HEARING REQUIREMENT, copies of which are attached hereto and hereby served upon you.

Respectfully submitted,

ILLINOIS ENVIRONMENTAL  
PROTECTION AGENCY

By: /s/ Mallory Meade  
Mallory Meade, #6345981  
Assistant Attorney General  
Environmental Bureau  
500 South Second Street  
Springfield, Illinois 62706  
(217) 299-8343  
mallory.meade@ilag.gov

Dated: June 10, 2026

**SERVICE LIST**

Randy Peter  
1333 E. 1500th Street  
Quincy, IL 62305

Debra Peter  
1333 E. 1500th Street  
Quincy, IL 62305

Carol Webb  
Hearing Officer  
Illinois Pollution Control Board  
1021 North Grand Avenue East  
P.O. Box 19274  
Springfield, IL 62794-9274  
carol.webb@illinois.gov

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on June 10, 2026, before 5:00 PM, she caused to be served by both electronic and physical mail, a true and correct copy of the following instruments entitled Motion for Relief from Hearing Requirement to:

Randy Peter  
1333 E. 1500th Street  
Quincy, IL 62305

Debra Peter  
1333 E. 1500th Street  
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Carol Webb  
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Springfield, IL 62794-9274  
carol.webb@illinois.gov

This email transmission contains 5 pages.

/s/ Mallory Meade  
mallory.meade@ilag.gov  
Assistant Attorney General  
Environmental Bureau

Under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in this Certificate of Service are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that he verily believes the same to be true.

/s/ Mallory Meade  
mallory.meade@ilag.gov  
Assistant Attorney General  
Environmental Bureau

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	)	

**MOTION FOR RELIEF FROM HEARING REQUIREMENT**

NOW COMES Complainant, PEOPLE OF THE STATE OF ILLINOIS, by KWAME RAOUL, Attorney General of the State of Illinois, and pursuant to Section 31(c)(2) of the Illinois Environmental Protection Act (“Act”), 415 ILCS 5/31(c)(2) (2024), moves that the Illinois Pollution Control Board (“Board”) grant the parties in the above-captioned matter relief from the hearing requirement imposed by Section 31(c)(1) of the Act, 415 ILCS 5/31(c)(1) (2024). In support of this motion, Complainant states as follows:

1. The Complaint in this matter alleges violations of Sections 9(a), (9)(c), 12(a), 12(d), 21(a), 21(p)(1), 21(p)(3), 21(p)(4), 21(p)(6), 21(p)(7)(i), 21(e), 55(a)(1), 55(a)(2), and 55(k)(1) of the Act, Sections 722.111, 739.122(c), and 808.121(a) of the Board’s regulations, and Sections 1-83(c) and 1-83(d) of the Consumer Electronics Recycling Act (CERA).
2. Complainant filed its Complaint on April 14, 2026.
3. The parties have reached agreement on all outstanding issues in this matter.
4. This agreement is presented to the Board in a Stipulation and Proposal for

Settlement filed this same date.

5. All parties agree that a hearing on the Stipulation and Proposal for Settlement is not necessary, and respectfully request relief from such a hearing as allowed by Section 31(c)(2) of the Act, 415 ILCS 5/31(c)(2) (2024).

WHEREFORE, Complainant, PEOPLE OF THE STATE OF ILLINOIS, hereby requests that the Board grant this Motion for Relief from Hearing Requirement set forth in Section 31(c)(1) of the Act, 415 ILCS 5/31(c)(1) (2024).

Respectfully submitted,  
PEOPLE OF THE STATE OF ILLINOIS,  
by KWAME RAOUL, Attorney General  
of the State of Illinois

MATTHEW J. DUNN, Chief  
Environmental Enforcement / Asbestos  
Litigation Division

By: /s/ Mallory Meade  
Mallory Meade, # 6345981  
Assistant Attorney General  
Environmental Bureau  
Illinois Attorney General's Office  
500 South Second Street  
Springfield, Illinois 62706  
Phone: (217) 299-8343  
Mallory.Meade@ilag.gov

DATE: June 10, 2026

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**NOTICE OF FILING**

To: See Attached Service List (Via Electronic Filing)

PLEASE TAKE NOTICE that the undersigned filed today with the Office of the Clerk of the Illinois Pollution Control Board by electronic filing the following STIPULATION AND PROPOSAL FOR SETTLEMENT, copies of which are attached hereto and hereby served upon you.

Respectfully submitted,

ILLINOIS ENVIRONMENTAL  
PROTECTION AGENCY

By: /s/ Mallory Meade  
Mallory Meade, #6345981  
Assistant Attorney General  
Environmental Bureau  
500 South Second Street  
Springfield, Illinois 62706  
(217) 299-8343  
mallory.meade@ilag.gov

Dated: June 10, 2026

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on June 10, 2026, before 5:00 PM, she caused to be served by both electronic and physical mail, a true and correct copy of the following instruments entitled Stipulation and Proposal for Settlement to:

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This email transmission contains 13 pages.

/s/ Mallory Meade  
mallory.meade@ilag.gov  
Assistant Attorney General  
Environmental Bureau

Under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in this Certificate of Service are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that he verily believes the same to be true.

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**STIPULATION AND PROPOSAL FOR SETTLEMENT**

Complainant, PEOPLE OF THE STATE OF ILLINOIS, *ex rel.* KWAME RAOUL, Attorney General of the State of Illinois, the ILLINOIS ENVIRONMENTAL PROTECTION AGENCY (“Illinois EPA”), and Respondents, RANDY PETER and DEBRA PETER, individuals (“Mr. Peter” and “Ms. Peter”, or “Respondents”), (collectively “Parties to the Stipulation”), have agreed to the making of this Stipulation and Proposal for Settlement (“Stipulation”) and submit it to the Illinois Pollution Control Board (“Board”) for approval. This stipulation of facts is made and agreed upon for purposes of settlement only and as a factual basis for the Board’s approval of this Stipulation and issuance of relief. None of the facts stipulated herein shall be introduced into evidence in any other proceeding regarding the violations of the Illinois Environmental Protection Act (“Act”), 415 ILCS 5/1, et seq. (2024), and the Board’s regulations, alleged in the Complaint except as otherwise provided herein. It is the intent of the Parties to the Stipulation that it be a final adjudication of this matter.

**I. STATEMENT OF FACTS**

**A. Parties**

1. On April 14, 2026, a Complaint was filed on behalf of the People of the State of Illinois by Kwame Raoul, Attorney General of the State of Illinois, on his own motion and upon the request of the Illinois EPA, pursuant to Section 31 of the Act, 415 ILCS 5/31 (2024), against the Respondents.

2. The Illinois EPA is an administrative agency of the State of Illinois, created pursuant to Section 4 of the Act, 415 ILCS 5/4 (2024).

3. At all times relevant to this Complaint, Respondents owned the parcels of property located at 1457 N 1363<sup>rd</sup> Ln., Quincy, IL 62305 ("the Site"), where Mr. Peter owns and operates a farm, and 1333 E. 1500<sup>th</sup> St., Quincy, IL 62305 ("Precision Pumping Site."), where Mr. Peter operates Precision Pumping, Inc., an agricultural pumping business.

**B. Allegations of Non-Compliance**

Complainant contends that the Respondents have violated the following provisions of the Act and Board regulations:

- Count I: Open Dumping  
415 ILCS 5/21(a) (2024)
- Count II: Open Dumping Resulting in Litter  
415 ILCS 5/21(p)(1) (2024)
- Count III: Open Dumping of General Construction or Demolition Debris  
415 ILCS 21(p)(7)(i) (2024)
- Count IV: Waste Disposal at an Improper Site  
415 ILCS 5/21(e) (2024)
- Count V: Open Dumping of Used or Waste Tires  
415 ILCS 5/55(a)(1) (2024)
- Count VI: Open Burning of Used or Waste Tires  
415 ILCS 5/55(a)(2) (2024)

- Count VII: Accumulation of Water in Used or Waste Tires  
415 ILCS 5/55(k)(1) (2024)
- Count VIII: Waste Determination Violations  
415 ILCS 5/21(e) (2024); 35 Ill. Adm. Code 722.111, 739.122(c)  
and 808.121(a)
- Count IX: Air Pollution – Open Burning  
415 ILCS 5/9(a) and (c) (2024)
- Count X: Open Dumping Resulting in Open Burning  
415 ILCS 5/21(p)(3) (2024)
- Count XI: Mixing of a Covered Electronic Device With Waste Intended for  
Disposal by Burning  
415 ILCS 151/1-83(c) (2024)
- Count XII: Cause or Allow the Burning or Incineration of a CED or Other  
Listed Device  
415 ILCS 151/1-83(d) (2024)
- Count XIII: Open Dumping Resulting in Standing or Flowing Liquid Discharge  
From the Dump Site  
415 ILCS 5/21(p)(6) (2024)
- Count XIV: Open Dumping of Waste in Standing Waters  
415 ILCS 5/21(p)(4) (2024)
- Count XV: Water Pollution  
415 ILCS 5/12(a) (2024)
- Count XVI: Water Pollution Hazard  
415 ILCS 5/12(d) (2024)

**C. Admission of Violations**

The Respondents admit to the violations alleged in the Complaint filed in this matter and referenced above.

**D. Compliance Activities to Date**

1. On September 6, 2022, Illinois EPA inspectors examined the Site and found that all violations were resolved except for continuing tire violations.

2. On September 14, 2022, Mr. Peter provided the Illinois EPA a tire tracking receipt. All violations were resolved at that time.

## II. APPLICABILITY

This Stipulation shall apply to and be binding upon the Parties to the Stipulation. The Respondents waive as a defense to any enforcement action taken pursuant to this Stipulation the failure of any of their officers, directors, agents, employees or successors or assigns to take such action as shall be required to comply with the provisions of this Stipulation. This Stipulation may be used against the Respondents in any subsequent enforcement action or permit proceeding as proof of a past adjudication of violation of the Act and the Board Regulations for all violations alleged in the Complaint in this matter, for purposes of Sections 39 and 42 of the Act, 415 ILCS 5/39 and 42 (2024).

## III. IMPACT ON THE PUBLIC RESULTING FROM ALLEGED NON-COMPLIANCE

Section 33(c) of the Act, 415 ILCS 5/33(c) (2024), provides as follows:

In making its orders and determinations, the Board shall take into consideration all the facts and circumstances bearing upon the reasonableness of the emissions, discharges, or deposits involved including, but not limited to:

1. the character and degree of injury to, or interference with the protection of the health, general welfare and physical property of the people;
2. the social and economic value of the pollution source;
3. the suitability or unsuitability of the pollution source to the area in which it is located, including the question of priority of location in the area involved;
4. the technical practicability and economic reasonableness of reducing or eliminating the emissions, discharges or deposits resulting from such pollution source; and

5. any subsequent compliance.

In response to these factors, the Parties to the Stipulation state the following:

1. Human health and the environment were threatened by the Respondents' open dumping of miscellaneous waste, including construction debris, electronic devices, white goods and household waste; burning of diesel fuel; and the unpermitted storage of used and waste tires.
2. There is social and economic benefit to the Site, where Mr. Peter operates a farm, and the Precision Pumping Site, where Mr. Peter operates an agricultural pumping business.
3. Operation of the Site was and is suitable for the area in which it is located, so long as it is operated in compliance with the Act and Board regulations.
4. Disposing of waste properly to permitted sites was both technically practicable and economically reasonable.
5. Respondents have subsequently complied with the Act and the Board regulations.

#### **IV. CONSIDERATION OF SECTION 42(h) FACTORS**

Section 42(h) of the Act, 415 ILCS 5/42(h) (2024), provides as follows:

In determining the appropriate civil penalty to be imposed under . . . this Section, the Board is authorized to consider any matters of record in mitigation or aggravation of penalty, including but not limited to the following factors:

1. the duration and gravity of the violation;
2. the presence or absence of due diligence on the part of the respondent in attempting to comply with requirements of this Act and regulations thereunder or to secure relief therefrom as provided by this Act;
3. any economic benefits accrued by the respondent because of delay in compliance with requirements, in which case the economic benefits shall be determined by the lowest cost alternative for achieving compliance;
4. the amount of monetary penalty which will serve to deter further violations by the respondent and to otherwise aid in enhancing voluntary compliance with this Act by the respondent and other persons similarly subject to the Act;

5. the number, proximity in time, and gravity of previously adjudicated violations of this Act by the respondent;
6. whether the respondent voluntarily self-disclosed, in accordance with subsection i of this Section, the non-compliance to the Agency;
7. whether the respondent has agreed to undertake a "supplemental environmental project," which means an environmentally beneficial project that a respondent agrees to undertake in settlement of an enforcement action brought under this Act, but which the respondent is not otherwise legally required to perform; and
8. whether the respondent has successfully completed a Compliance Commitment Agreement under subsection (a) of Section 31 of this Act to remedy the violations that are the subject of the complaint.

In response to these factors, the Parties to the Stipulation state as follows:

1. Respondents required approximately 233 days from the time of Illinois EPA's initial inspection on January 24, 2022, to abate all violations identified in Illinois EPA's Violation Notice L-2022-0160, including the cleanup of multiple piles of open dumped waste.
2. Respondents showed reasonable diligence in attempting to come back into compliance with the Act and Board regulations, once Illinois EPA notified them of their noncompliance.
3. The civil penalty takes into account any economic benefit realized by the Respondents as a result of avoided or delayed compliance.
4. Complainant has determined, based upon the specific facts of this matter, that a civil penalty of \$15,000 will serve to deter further violations and aid in future voluntary compliance with the Act and Board regulations.
5. To Complainant's knowledge, Respondent has no previously adjudicated violations of the Act.
6. Self-disclosure is not at issue in this matter.

7. The settlement of this matter does not include a supplemental environmental project.

8. A Compliance Commitment Agreement was not at issue in this matter.

**V. TERMS OF SETTLEMENT**

**A. Penalty Payment**

The Respondents shall pay a civil penalty in the sum of \$15,000 within thirty (30) days from the date the Board adopts and accepts this Stipulation.

**B. Interest and Default**

1. If the Respondents fail to make any payment required by this Stipulation on or before the date upon which the payment is due, the Respondents shall be in default and the remaining unpaid balance of the penalty, plus any accrued interest, shall be due and owing immediately. In the event of default, the Complainant shall be entitled to reasonable costs of collection, including reasonable attorney's fees.

2. Pursuant to Section 42(g) of the Act, interest shall accrue on any penalty amount owed by the Respondents not paid within the time prescribed herein. Interest on unpaid penalties shall begin to accrue from the date such are due and continue to accrue to the date full payment is received. Where partial payment is made on any penalty amount that is due, such partial payment shall be first applied to any interest on unpaid penalties then owing.

**C. Payment Procedures**

1. All payments required by this Stipulation shall be made by certified check or money order payable to the Illinois EPA for deposit into the Environmental Protection Trust Fund. Payments shall be sent by first class mail and delivered to:

Illinois Environmental Protection Agency  
Fiscal Services

2520 W. Iles Ave.  
P.O. Box 19276  
Springfield, IL 62794-9276

2. The case name and case number shall appear on the face of each certified check or money order.
3. A copy of each certified check or money order and any transmittal letter shall be sent to:

Mallory Meade  
Assistant Attorney General  
Environmental Bureau South  
Illinois Attorney General's Office  
500 South Second St.  
Springfield, Illinois 62701

**D. Future Compliance**

1. The Illinois EPA, its employees and representatives, and the Attorney General, his employees and representatives, shall have the right of entry into and upon the Site which is the subject of this Stipulation, at all reasonable times for the purposes of conducting inspections and evaluating compliance status. In conducting such inspections, the Illinois EPA, its employees and representatives, and the Attorney General, his employees and representatives, may take photographs, samples, and collect information, as they deem necessary.

2. This Stipulation in no way affects the responsibilities of the Respondents to comply with any other federal, state or local laws or regulations, including but not limited to the Act and the Board Regulations.

3. The Respondents shall cease and desist from future violations of the Act and Board Regulations that were the subject matter of the Complaint.

**E. Release from Liability**

In consideration of the Respondents' payment of the civil penalty of \$15,000, their

commitment to cease and desist as contained in Section V.D.3 above, and upon the Board's approval of this Stipulation, the Complainant releases, waives and discharges the Respondents from any further liability or penalties for the violations of the Act and Board regulations that were the subject matter of the Complaint herein. The release set forth above does not extend to any matters other than those expressly specified in Complainant's Complaint filed contemporaneously with this Stipulation. The Complainant reserves, and this Stipulation is without prejudice to, all rights of the State of Illinois against the Respondents with respect to all other matters, including but not limited to, the following:

- a. criminal liability;
- b. liability for future violation of state, federal, local, and common laws and/or regulations;
- c. liability for natural resources damage arising out of the alleged violations; and
- d. liability or claims based on the Respondent's failure to satisfy the requirements of this Stipulation.

Nothing in this Stipulation is intended as a waiver, discharge, release, or covenant not to sue for any claim or cause of action, administrative or judicial, civil or criminal, past or future, in law or in equity, which the State of Illinois may have against any person, as defined by Section 3.315 of the Act, 415 ILCS 5/3.315, or entity other than the Respondents.

**F. Enforcement of Stipulation**

Upon the entry of the Board's Order approving and accepting this Stipulation, that Order is a binding and enforceable order of the Board and may be enforced as such through any and all available means.

**G. Execution of Stipulation**

The undersigned representatives for the Parties to the Stipulation certify that they are fully

authorized by the party whom they represent to enter into the terms and conditions of this Stipulation and to legally bind them to it.

WHEREFORE, the Parties to the Stipulation request that the Board adopt and accept the foregoing Stipulation and Proposal for Settlement as written.

AGREED:


FOR THE COMPLAINANT:

PEOPLE OF THE STATE OF ILLINOIS,  
*ex rel.* KWAME RAOUL, Attorney General  
of the State of Illinois

ILLINOIS ENVIRONMENTAL  
PROTECTION AGENCY

MATTHEW J. DUNN, Chief  
Environmental Enforcement/  
Asbestos Litigation Division

JAMES JENNINGS, Acting Director  
Illinois Environmental Protection Agency

BY:   
RACHEL MEDINA, Chief  
Environmental Bureau  
Assistant Attorney General

BY:   
ANDREW ARMSTRONG  
Chief Legal Counsel

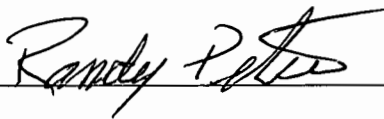
DATE: 6/5/2026


DATE: 06/03/2026

FOR THE RESPONDENTS:

RANDY PETER

DEBRA PETER

BY: 

BY: 

DATE: 5/26/26

DATE: 5/26/26