

SERVICE LIST

Mr. Bradley P. Halloran
Hearing Officer
Illinois Pollution Control Board
60 E. Van Buren Street, Suite 630
Chicago, IL 60605
Brad.Halloran@illinois.gov
(Via Email)

KESHEV INVESTMENTS, LLC
d/b/a CD ONE PRICE CLEANERS #9
c/o Pankaj Patel, Registered Agent
4N156 Doral Drive
West Chicago, IL 60185-1204
(Via U.S. Mail)

CERTIFICATE OF SERVICE

I, Rebecca Kanz, an Assistant Attorney General, certify that on the 1st day of July 2026, I caused to be served the foregoing Notice of Filing, Motion for Relief from Hearing Requirement and Stipulation and Proposal for Settlement with Respondent KESHAV INVESTMENTS, LLC d/b/a CD One Price Cleaners #9, on the parties named in the attached Service List by methods described.

/s/ Rebecca Kanz
Rebecca Kanz
Assistant Attorney General
Environmental Bureau
Illinois Attorney General's Office
115 S. LaSalle Street, 23rd Floor
Chicago, Illinois 60603
(312) 814-3532
Rebecca.Kanz@ilag.gov

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 the 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

BY: /s/ Rebecca Kanz
Rebecca Kanz
Assistant Attorney General
Environmental Bureau
Illinois Attorney General's Office
69 W. Washington Street, Suite 1800
Chicago, Illinois 60602
(773) 590-7968
Primary: Rebecca.Kanz@ilag.gov
Secondary: Maria.Cacaccio@ilag.gov

DATE: July 1, 2026

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. 26-059
)	(Enforcement - Air)
KESHAV INVESTMENTS, LLC)	
d/b/a CD One Price Cleaners #9,)	
an Illinois limited liability company,)	
)	
Respondent.)	

STIPULATION AND PROPOSAL FOR SETTLEMENT

Complainant, PEOPLE OF THE STATE OF ILLINOIS, by KWAME RAOUL, Attorney General of the State of Illinois, the ILLINOIS ENVIRONMENTAL PROTECTION AGENCY (“Illinois EPA”), and KESHAV INVESTMENTS, LLC d/b/a CD One Price Cleaners #9 (“Respondent”), (collectively “Parties to the Consent Order”), 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 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 May 15, 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 Illinois EPA, pursuant to Section 31 of the Act, 415 ILCS 5/31 (2024), against Respondent.

2. Illinois EPA is an administrative agency of the State of Illinois created pursuant to Section 4 of the Act, 415 ILCS 5/4 (2024), and is charged, *inter alia*, with the duty of enforcing the Act.

3. At all times relevant to this Complaint, Respondent was and is an Illinois corporation in good standing.

4. Upon information and belief, prior to in or around December 2023, Darville, Inc. d/b/a CD One Price Cleaners Chicago (“Darville”) owned and operated a dry-cleaning facility located at 6600 West North Avenue, Chicago, Cook County, Illinois, 60707 (“Facility”).

5. On April 10, 2008, Illinois EPA issued a revised Lifetime Operating Permit (“LOP”) 06020072 to Darville due to change of ownership of the Facility.

6. In or around December 2023, Respondent became the owner and operator of the Facility.

7. From in or around December 2023, through the date of the filing of this Complaint, Respondent has owned and operated and continues to own and operate the Facility.

8. Prior to calendar year 2021, the emission units at the Facility included two perchloroethylene dry cleaning machines.

9. Since calendar year 2021, the emission units at the Facility included and continue to include two DF-2000 dry cleaning machines.

B. Allegations of Non-Compliance

Complainant contends that Respondent has violated the following provisions of the Act and Board regulations:

Count I: Failure to Submit 2023 and 2024 Annual Emissions Report in violation of Section 9(a) of the Act, 415 ILCS 5/9(a) (2024), Section 201.302(a) of the Board Air Pollution Regulations, 35 Ill. Adm. Code 201.302(a), and Section 254.132(a) of the Illinois EPA Air Pollution Regulations, 35 Ill. Adm. Code 254.132(a); and

Count II: Operating Without the Requisite Permit in violation of Section 9(b) of the Act, 415 ILCS 5/9(b) (2024).

C. Admission of Violations

Respondent admits to the violations alleged in the Complaint filed in this matter and referenced above.

D. Compliance Activities to Date

1. On March 18, 2026, Illinois EPA received annual emissions reports (“AERs”) for calendar years 2023 and 2024 from Respondent.

2. On March 19, 2026, Respondent submitted to Illinois EPA an application for a Registration of Smaller Sources (“ROSS”) Program Permit for the Facility.

3. On May 15, 2026, Illinois EPA approved the application for a ROSS Program Permit for the Facility.

II. APPLICABILITY

This Stipulation shall apply to and be binding upon the Parties to the Stipulation. Respondent shall not raise as a defense to any enforcement action taken pursuant to this Stipulation the failure of any of its 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 Respondent 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. Illinois EPA's information gathering responsibilities were hindered by Respondent's violations thereby threatening human health and the environment.
2. There is social and economic benefit to the Facility.
3. Operation of the Facility was and is suitable for the area in which it is located.

4. Submitting AERs for calendar years 2023 and 2024 to Illinois EPA and obtaining the requisite permit for the Facility were both technologically practicable and economically reasonable.

5. Respondent has 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. Respondent failed to submit AERs for calendar years 2023 and 2024 to Illinois EPA and failed to obtain the requisite permit for the Facility. The violations for the 2023 and 2024 AER began on May 2, 2024, and May 2, 2025, respectively, and continued until March 18, 2026, when Illinois EPA received the AERs for calendar years 2023 and 2024. The violation for obtaining the requisite permit for the Facility began in or around December 2023 and continued until May 15, 2026, when Illinois EPA approved the application for a ROSS Program Permit for the Facility.

2. Respondent was partially diligent in attempting to comply with the requirements of this Act and regulations thereunder.

3. The civil penalty takes into account any economic benefit realized by Respondent as a result of avoided or delayed compliance.

4. Complainant has determined, based upon the specific facts of this matter, that a penalty of \$20,000 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

Respondent shall pay a civil penalty in the sum of \$20,000 within thirty (30) days from the date the Board adopts and accepts this Stipulation.

B. Interest and Default

1. If Respondent fails to make any payment required by this Stipulation on or before the date upon which the payment is due, Respondent 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, 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 Respondent 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 Illinois EPA for deposit into the Environmental Protection Trust Fund ("EPTF").

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 the certified check or money order.

3. A copy of the certified check or money order and any transmittal letter shall be sent to:

Rebecca Kanz
Assistant Attorney General
Environmental Bureau
Illinois Attorney General's Office
115 S. LaSalle St., 23rd Floor
Chicago, Illinois 60603

D. Future Compliance

1. On or before May 1, 2027, Respondent shall timely submit an AER for the year 2026 reporting emissions from January 1 through May 15, 2026.

2. In addition to any other authorities, Illinois EPA, its employees and representatives, and the Attorney General, his employees and representatives, shall have the right of entry into and upon Respondent's Facility 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, 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.

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

4. Respondent 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 Respondent's payment of the \$20,000 penalty and any specified costs and accrued interest, its commitment to cease and desist as contained in Section V.D.4 above,

completion of all activities required hereunder, and upon the Board's approval of this Stipulation, Complainant releases, waives and discharges Respondent 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 on May 15, 2026. Complainant reserves, and this Stipulation is without prejudice to, all rights of the State of Illinois against Respondent 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 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 Respondent.

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. This Stipulation may be executed by the parties in one or more counterparts, all of which taken together shall constitute one and the same instrument.

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

AGREED:

FOR 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, Director
Illinois Environmental Protection Agency

BY: *Stephen J. Sylvester*
STEPHEN J. SYLVESTER, Chief
Environmental Bureau
Assistant Attorney General

BY: *Andrew Armstrong*
ANDREW ARMSTRONG
Chief Legal Counsel

DATE: 6/26/26

DATE: 06/24/2026

FOR RESPONDENT:

KESHAV INVESTMENTS, LLC d/b/a CD
One Price Cleaners #9

BY: *Deep Patel*

Its: *Member*

DATE: 6/19/26