

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.
	)	
CHUCK'S RENTALS, INC. d/b/a	)	
PLEASANT VALLEY MOBILE HOME	)	
PARK, an Illinois corporation,	)	
	)	
Respondent.	)	
	)	

NOTICE OF FILING

To: See Attached Service List (Via Electronic Filing)

PLEASE TAKE NOTICE that I have today filed with the Office of the Clerk of the Illinois Pollution Control Board by electronic filing the following Complaint, a copy of which is attached and hereby served upon you. **You may be required to answer the charges of the Complaint at a hearing before the Board, at a date set by the Board.**

Failure to file an answer to this complaint within 60 days may have severe consequences. Failure to answer will mean that all allegations in the complaint will be taken as if admitted for purposes of this proceeding. If you have any questions about this procedure, you should contact the hearing officer assigned to this proceeding, the clerk's office, or an attorney.

NOTIFICATION - YOU ARE HEREBY NOTIFIED that financing may be available through the Illinois Environmental Facilities Financing Act [20 ILCS 3515/1, et seq.] to correct the alleged violations.

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: August 7, 2026

SERVICE LIST

Gregory A. Veach
1400 North Wood Road, Suite 5
Murphysboro, Illinois 62966

Dylan P. Grady
Brown, Hay & Stephens
205 S. 5th Street, Suite 1000
Springfield, Illinois 62701

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PLEASANT VALLEY MOBILE HOME	)	
PARK, an Illinois corporation,	)	
	)	
Respondent.	)	
	)	

COMPLAINT

Complainant, PEOPLE OF THE STATE OF ILLINOIS, by Kwame Raoul, Attorney General of the State of Illinois, complains of Respondent, CHUCK’S RENTALS, INC. d/b/a PLEASANT VALLEY MOBILE HOME PARK, as follows:

COUNT I
WATER POLLUTION

1. This Count is brought 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 at the request of the Illinois Environmental Protection Agency (“Illinois EPA” or “Agency”), pursuant to the terms and provisions of Section 31 of the Illinois Environmental Protection Act (“Act”), 415 ILCS 5/31 (2024).

2. The Illinois EPA is an agency of the State of Illinois created by the Illinois General Assembly in Section 4 of the Act, 415 ILCS 5/4 (2024), and charged, *inter alia*, with the duty of enforcing the Act.

3. The Illinois Pollution Control Board (“Board”) is an independent board created by

the Illinois General Assembly in Section 5 of the Act, 415 ILCS 5/5 (2024), and charged, *inter alia*, with the duty of promulgating standards and regulations under the Act.

4. Respondent, Chuck's Rentals, Inc. d/b/a Pleasant Valley Mobile Home Park ("Pleasant Valley MHP" or "Respondent"), is an Illinois corporation. As of June 12, 2026, Chuck's Rentals, Inc. was dissolved. At all times relevant to this Complaint, Respondent owned or operated a wastewater treatment plant ("the Facility") serving a mobile home park in Jackson County which is located at 182 Warren Rd, Carbondale, IL. The Facility serves approximately seventy residents.

5. As of the date of filing of this Complaint, the Facility is located in an area of Environmental Justice ("EJ") concern as identified using Illinois EPA EJ Start.

6. The Facility consists of three cells that are permitted to discharge treated wastewater from a single outfall to an unnamed tributary of Drury Creek.

7. At all times relevant to this Complaint, Respondent was subject to National Pollutant Discharge Elimination System Permit for Sewage Treatment Systems No. IL0047601 ("the NPDES Permit"), issued by Illinois EPA on June 1, 2022, and expiring on May 31, 2027.

8. At all times relevant to this Complaint, the NPDES Permit provided, among others, the following limitations in the treated wastewater discharged from the Facility, expressed in pounds per day ("lb/d") or milligrams per liter ("mg/L"): 12 mg/L Total Suspended Solids ("TSS") per month, 10 mg/L carbonaceous 5-Day Biochemical Oxygen Demand ("CBOD₅") per month, and varying limits for Dissolved Oxygen ("DO"), as expressed in the chart below.

Parameter	Limits
Total Suspended Solids (monthly average maximum concentration)	12 mg/L
Total Suspended Solids (monthly average maximum load limits)	8.7 lbs/d

Carbonaceous 5-Day Biochemical Oxygen Demand (monthly average maximum concentration)	10 mg/L
Dissolved Oxygen March – July (daily minimum)	5 mg/L
Dissolved Oxygen March – July (weekly average minimum)	6 mg/L
Dissolved Oxygen August - February (monthly average minimum)	5.5 mg/L
Dissolved Oxygen August – February (daily minimum)	3.5 mg/L
Dissolved Oxygen (August – February) (weekly average minimum)	4 mg/L
Dissolved Oxygen August – February (monthly average minimum)	>5.5 mg/L per month

9. During the following months, Respondent exceeded the NPDES Permit's limitations on weekly average, monthly average, or daily maximum for CBOD₅ and TSS; and weekly average, monthly average, or daily minimum for Dissolved Oxygen. The exceedances are detailed in the table below:

Date	Effluent Parameter	Limitation	Concentration Limit (mg/L)	Reported Value (mg/L)
July 2022	DO	Daily minimum	5 mg/L	4 mg/L
July 2022	DO	Weekly average minimum	6 mg/L	4 mg/L
August 2022	DO	Monthly average minimum	5.5 mg/L	5.1 mg/L
December 2022	DO	Daily minimum	3.5 mg/L	2.5 mg/L
December 2022	DO	Weekly average minimum	4 mg/L	2.5 mg/L
December 2022	DO	Monthly average minimum	5.5 mg/L	2.5 mg/L

Date	Effluent Parameter	Limitation	Concentration Limit (mg/L)	Reported Value (mg/L)
May 2023	DO	Weekly average minimum	6 mg/L	5.5 mg/L
July 2022	TSS	Monthly average maximum	12 mg/L	20 mg/L
August 2022	TSS	Monthly average maximum	12 mg/L	24 mg/L
September 2022	TSS	Monthly average maximum	12 mg/L	20 mg/L
October 2022	TSS	Monthly average maximum	12 mg/L	24 mg/L
October 2022 (Load Limits)	TSS	Monthly average maximum	8.7 lbs/d	15.1 lbs/d
January 2023	TSS	Daily maximum	24 mg/L	30 mg/L
January 2023	TSS	Monthly average maximum	12 mg/L	30 mg/L
February 2023	TSS	Monthly average maximum	12 mg/L	14 mg/L
September 2023	TSS	Monthly average maximum	12 mg/L	16 mg/L
September 2022	CBOD ₅	Monthly average maximum	10 mg/L	14 mg/L
January 2023	CBOD ₅	Monthly average maximum	10 mg/L	14 mg/L
February 2023	CBOD ₅	Monthly average maximum	10 mg/L	13 mg/L
March 2023	CBOD ₅	Monthly average maximum	10 mg/L	11 mg/L
May 2023	DO	Weekly average minimum	6 mg/L	5.5 mg/L
September 2023	TSS	Monthly average maximum	12 mg/L	16 mg/L
October 2023	DO	Monthly average minimum	5.5 mg/L	5 mg/L
November 2023	DO	Monthly average minimum	5.5 mg/L	5 mg/L
January 2024	TSS	Monthly average maximum	12 mg/L	18 mg/L
March 2024	CBOD ₅	Monthly average maximum	10 mg/L	17.1 mg/L

10. On March 28, 2023, the Illinois EPA inspected the Facility. The Illinois EPA inspector observed significant discharge draining under the culvert from the cell 2 berm into the ditch bypassing cell 3.

11. During the same visit, maintenance deficiencies were also observed on the lagoon berms where rodent activity and tap root vegetation had not been properly managed. A significant number of tree limbs and debris were also observed in cell 1 and cell 2.

12. Finally, the Illinois EPA inspector observed the presence of large, eroded channels near cell 1 which suggests excessive amounts of stormwater had entered the cell.

13. Following repairs in October 2024 at the Facility, exceedances of the NPDES Permit ceased.

14. On April 3, 2026, Illinois EPA inspected the Facility and determined that all necessary repairs of the Facility were completed.

15. Section 12(a) of the Act, 415 ILCS 5/12(a) (2024), provides as follows:

No person shall:

- (a) Cause or threaten or allow the discharge of any contaminants into the environment in any State so as to cause or tend to cause water pollution in Illinois, either alone or in combination with matter from other sources, or so as to violate regulations or standards adopted by the Pollution Control Board under this Act.

16. Section 3.165 of the Act, 415 ILCS 5/3.165 (2024), provides the following definition:

“Contaminant” is any solid, liquid, or gaseous matter, any odor, or any form of energy, from whatever source.

17. Wastewater discharged from the Facility and into the unnamed tributary of Drury Creek is a contaminant as that term is defined by Section 3.165 of the Act, 415 ILCS 5/3.165 (2024).

18. Pursuant to the authority granted in Sections 13 and 27 of the Act, 415 ILCS 5/13 and 5/27 (2024), the Board has promulgated rules and regulations to control water pollution in Illinois, codified at 35 Ill. Adm. Code, Subtitle C, Chapter I (“Board’s Water Pollution Regulations”).

19. Section 304.141(a) of the Board’s Water Pollution Regulations, 35 Ill. Adm. Code 304.141(a), provides as follows:

A person that has been issued an NPDES Permit must not discharge any contaminant in its effluent in excess of the standards and limitations for that

contaminant in its permit.

20. Section 3.315 of the Act, 415 ILCS 5/3.315 (2024), provides the following definition:

“Person” is any individual, partnership, co-partnership, firm, company, limited liability company, corporation, association, joint stock company, trust, estate, political subdivision, state agency, or any other legal entity, or their legal representative, agent or assigns.

21. Respondent is a “person” as that term is defined in Section 3.315 of the Act, 415 ILCS 5/3.315 (2024).

22. Section 3.550 of the Act, 415 ILCS 5/3.550 (2024), provides the following definition:

“Waters” means all accumulations of water, surface and underground, natural, and artificial, public and private, or parts thereof, which are wholly or partially within, flow through, or border upon this State.

23. The unnamed tributary of the Drury Creek, which receives wastewater from the Facility, is a “water” as that term is defined in Section 3.550 of the Act, 415 ILCS 5/3.550 (2024).

24. Section 301.275 of the Board’s Water Pollution Regulations, 35 Ill. Adm. Code 301.275, provides as follows:

“Effluent” means any wastewater discharged, directly or indirectly, to the waters of the State or to any storm sewer, and the runoff from land used for the disposition of wastewater or sludges, but does not otherwise include nonpoint source discharges such as runoff from land or any livestock management facility or livestock waste handling facility subject to regulation under Subtitle E.

25. Wastewater discharged from the Facility constitutes “effluent” as that term is defined in Section 301.275 of the Board’s Water Pollution Regulations, 35 Ill. Adm. Code 301.275.

26. Section 3.545 of the Act, 415 ILCS 5/3.545 (2024), provides as follows:

“Water pollution” is such alteration of the physical, thermal, chemical, biological or radioactive properties of any waters of the State, or such

discharge of any contaminant into any waters of the State, as will or is likely to create a nuisance or render such waters harmful or detrimental or injurious to public health, safety or welfare, or to domestic, commercial, industrial, agricultural, recreational, or other legitimate uses, or to livestock, wild animals, birds, fish, or other aquatic life.

27. Respondent's discharges of wastewater from the Facility into the unnamed tributary of Drury Creek containing contaminants in excess of permitted limits rendered waters of the State harmful to (a) public health, safety or welfare; (b) domestic, commercial, industrial, agricultural, recreational, or other legitimate uses; or (c) livestock, wild animals, birds, fish, or other aquatic life, therefore constituting "water pollution" as that term is defined by Section 3.545 of the Act, 415 ILCS 5/3.545 (2024).

28. By causing, threatening, or allowing the discharge of contaminants into the environment so as to cause or tend to cause water pollution, Respondent violated Section 12(a) of the Act, 415 ILCS 5/12(a) (2024).

29. By discharging effluent containing contaminants in excess of permitted limits, Respondent violated Section 304.141(a) of the Board's Water Pollution Regulations, 35 Ill. Adm. Code 301.141(a).

30. By violating Section 304.141(a) of the Board's Water Pollution Regulations, 35 Ill. Adm. Code 304.141(a), Respondent thereby violated Section 12(a) of the Act, 415 ILCS 5/12(a) (2024).

PRAYER FOR RELIEF

WHEREFORE, Complainant, PEOPLE OF THE STATE OF ILLINOIS, respectfully requests that this Board enter an order against the Respondent, CHUCK'S RENTALS, INC. d/b/a PLEASANT VALLEY MOBILE HOME PARK, on this Count I, as follows:

A. Authorizing a hearing in this matter at which time the Respondent will be required to answer the allegations herein;

B. Finding that the Respondent has violated Section 12(a) of the Act, 415 ILCS 5/12(a) (2024) and Section 304.141(a) of the Board's Water Pollution Regulations, 35 Ill. Adm. Code 304.141(a);

C. Ordering the Respondent to cease and desist from any further violations of Section 12(a) of the Act, 415 ILCS 5/12(a) (2024) and Section 304.141(a) of the Board's Water Pollution Regulations, 35 Ill. Adm. Code 304.141(a);

D. Pursuant to Section 42(a) of the Act, 415 ILCS 5/42(a) (2024), assessing against the Respondent a civil penalty of \$50,000.00 for each violation of the Act and Board Regulations, and an additional civil penalty of \$10,000.00 for each day each violation continued;

E. Ordering the Respondent to pay all costs, including expert witness, consultant and attorney fees, expended by the State in pursuit of this action; and

F. Ordering such other and further relief as the Board deems appropriate and just.

COUNT II
NPDES PERMIT VIOLATIONS

1–25. Complainant re-alleges and incorporates herein by reference paragraphs 1 through 14 and 17 through 27 of Count I as paragraphs 1 through 25 of this Count II.

26. Section 12(f) of the Act, 415 ILCS 5/12(f) (2024), provides as follows:

No person shall:

- (f) Cause, threaten or allow the discharge of any contaminant into the waters of the State, as defined herein, including but not limited to, waters to any sewage works, or into any well or from any point source within the State, without an NPDES permit for point source discharges issued by the Agency under Section 39(b) of this Act, or in violation of any term or condition imposed by such permit, or in violation of any

NPDES permit filing requirement established under Section 39(b), or in violation of any regulations adopted by the Board or of any order adopted by the Board with respect to the NPDES program.

27. Section 3.105 of the Act, 415 ILCS 5/3.105 (2024), provides as follows:

“Agency” is the Environmental Protection Agency established by this Act.

28. Section 309.102(a) of the Board’s Water Pollution Regulations, 35 Ill. Adm. Code 309.102(a), provides as follows:

- (a) Unless it complies with the Act, Board regulations, the CWA, and the provisions and conditions of the NPDES permit issued to the discharger, the discharge of any contaminant or pollutant by any person into the waters of the State from a point source or into a well is unlawful.

29. Section 301.240 of the Board’s Water Pollution Regulations, 35 Ill. Adm. Code 301.240, provides as follows:

“CWA” means the Federal Water Pollution Control Act, as amended, (33 U.S.C. 1251 et seq., Public Law 92-500 enacted by Congress October 18, 1972 as amended by the “Clean Water Act”, Public Law 95-217, enacted December 12, 1977, as amended.)

30. Section 502(14) of the CWA, 33 U.S.C. § 1362(14), provides as follows:

- (14) The term “point source” means any discernible, confined and discrete conveyance, including but not limited to any pipe, ditch, channel, tunnel, conduit, well, discrete fissure, container, rolling stock, concentrated animal feeding operation, or vessel or other floating craft, from which pollutants are or may be discharged. This term does not include agricultural stormwater discharges and return flows from irrigated agriculture.

31. The Facility’s single outfall, which discharges into an unnamed tributary of the Drury Creek, is a “point source” as that term is defined by Section 502(14) of the CWA, 33 U.S.C. § 1362(14), and as authorized by the NPDES Permit.

32. The Facility's cell 2 berm is a "point source" as that term is defined by Section 502(14) of the CWA, 33 U.S.C. § 1362(14).

33. Section 39(b) of the Act, 415 ILCS 5/39(b) (2024), provides as follows:

- (b) The Agency may issue NPDES permits exclusively under this subsection for the discharge of contaminants from point sources into navigable waters, all as defined in the Federal Water Pollution Control Act, as now or hereafter amended, within the jurisdiction of the State, or into any well.

All NPDES permits shall contain those terms and conditions, including, but not limited to, schedules of compliance, which may be required to accomplish the purposes and provisions of this Act.

* * *

The Agency may include, among such conditions, effluent limitations and other requirements established under this Act, Board regulations, the Federal Water Pollution Control Act, as now or hereafter amended, and regulations pursuant thereto, and schedules for achieving compliance therewith at the earliest reasonable date.

34. The Illinois EPA issued coverage to Respondent under the NPDES Permit pursuant to its authority in Section 39(b) of the Act, 415 ILCS 5/39(b) (2024).

35. Respondent lacks NPDES coverage issued by the Agency under Section 39(b) of the Act for point source discharges from the cell 2 berm.

36. By discharging wastewater, which is a contaminant, from the Facility into the unnamed tributary of Drury Creek, so as to exceed the Facility's NPDES-permitted effluent limits, Respondent caused, threatened, or allowed the discharge of a contaminant from a point source into the waters of the State in violation of the NPDES Permit.

37. By causing, threatening or allowing the unpermitted discharge of contaminants under the culvert from the cell 2 berm into the ditch bypassing cell 3, Respondent violated Section 12(f) of the Act, 415 ILCS 5/12(f) (2024).

38. By causing, threatening, or allowing the discharge of a contaminant from a point source into the waters of the State in violation of the NPDES Permit's effluent limits, Respondent violated Section 12(f) of the Act, 415 ILCS 5/12(f) (2024), and Section 309.102(a) of the Board's Water Pollution Regulations, 35 Ill. Adm. Code 309.102(a).

PRAYER FOR RELIEF

WHEREFORE, Complainant, PEOPLE OF THE STATE OF ILLINOIS, respectfully requests that this Board enter an order against the Respondent, CHUCK'S RENTALS, INC. d/b/a PLEASANT VALLEY MOBILE HOME PARK, on this Count II, as follows:

A. Authorizing a hearing in this matter at which time the Respondent will be required to answer the allegations herein;

B. Finding that the Respondent has violated Section 12(f) of the Act, 415 ILCS 5/12(f) (2024), Section 309.102(a) of the Board's Water Pollution Regulations, 35 Ill. Adm. Code 309.102(a); and the NPDES Permit;

C. Ordering the Respondent to cease and desist from any further violations of Section 12(f) of the Act, 415 ILCS 5/12(f) (2024); Section 309.102(a) of the Board's Water Pollution Regulations, 35 Ill. Adm. Code 309.102(a); and the NPDES Permit;

D. Assessing against Defendant, pursuant to Section 42(b)(1) of the Act, 415 ILCS 5/42(b)(1) (2024), a civil penalty of Ten Thousand Dollars (\$10,000.00) for each day of violation of Section 12(f) of the Act, 415 ILCS 5/12(f) (2024), Section 309.102(a) of the Board's Water Pollution Regulations, 35 Ill. Adm. Code 309.102(a); and the NPDES Permit;

E. Ordering the Respondent to pay all costs, including expert witness, consultant and attorney fees, expended by the State in pursuit of this action; and

F. Ordering such other and further relief as the Board deems appropriate and just.

COUNT III
OPERATIONS AND MAINTENANCE VIOLATIONS

1-25. Complainant re-alleges and incorporates herein by reference paragraphs 1 through 14, and 17 through 27 of Count I as paragraphs 1 through 25 of this Count III.

26. Section 306.102 of the Board's regulations, 35 Ill. Adm. Code 306.102, provides:

- a. Malfunctions: All treatment works and associated facilities shall be so constructed and operated as to minimize violations of applicable standards during such contingencies as flooding, adverse weather, power failure, equipment failure, or maintenance, through such measures as multiple units, holding tanks, duplicate power sources, or such other measures as may be appropriate.

* * *

27. Illinois EPA observed failures by Respondent to adequately maintain the Facility, including rodent activity, tap root vegetation, and tree limbs and debris in cells 1 and 2, and large eroded channels near cell 1 suggesting excessive amounts of stormwater had entered the cell.

28. A meeting between Respondent and Illinois EPA was held on October 3, 2023, pursuant to a Notice of Intent to Pursue Legal Action issued by Illinois EPA on September 1, 2023. At that meeting, Respondent described numerous repairs made to the berms since receiving the Violation Notice in hopes of preventing future exceedances. Despite these repairs, the exceedances continued, as evidenced by the exceedances detected in October 2023, November 2023, January 2024, and March 2024.

29. Following the October 2024 repairs to the Facility, all operations and maintenance-related violations at the Facility have ceased and no further remediation is currently required.

30. By failing to adequately maintain the Facility and continuing to discharge effluent containing contaminants in excess of permitted limits, Respondent failed to construct and operate

its sewer system so as to minimize violations of applicable standards during such contingencies as flooding, adverse weather, power failure, equipment failure, or maintenance through appropriate measures.

31. Beginning prior to the March 28, 2023 inspection and continuing at least until repairs were made after the Violation Notice was issued, and on dates better known to Respondent, Respondent failed to construct and operate its Facility so as to minimize violations of applicable standards during such contingencies as flooding, adverse weather, power failure, equipment failure, or maintenance through appropriate measures.

32. By failing to construct and operate its Facility so as to minimize violations of Respondent's NPDES Permit limitations, Respondents violated Section 306.102(a) of the Board's Water Pollution Regulations, 35 Ill. Adm. Code 306.102(a).

33. By causing, threatening or allowing the discharge of contaminants so as to violate Section 306.102(a), Respondent thereby violated Section 12(a) of the Act, 415 ILCS 5/12(a) (2024).

PRAYER FOR RELIEF

WHEREFORE, Complainant, PEOPLE OF THE STATE OF ILLINOIS, respectfully requests that this Board enter an order against the Respondent, CHUCK'S RENTALS, INC. d/b/a PLEASANT VALLEY MOBILE HOME PARK, on this Count III, as follows:

A. Authorizing a hearing in this matter at which time the Respondent will be required to answer the allegations herein;

B. Finding that the Respondent has violated Section 12(a) of the Act, 415 ILCS 5/12(a) (2024), and Section 306.102(a) of the Board's Water Pollution Regulations, 35 Ill. Adm. Code 306.102(a);

C. Ordering the Respondent to cease and desist from any further violations of Section 12(a) of the Act, 415 ILCS 5/12(a) (2024), and Section 306.102(a) of the Board's Water Pollution Regulations, 35 Ill. Adm. Code 306.102(a);

D. Pursuant to Section 42(a) of the Act, 415 ILCS 5/42(a) (2024), assessing against the Respondent a civil penalty of \$50,000.00 for each violation of the Act and Board Regulations, and an additional civil penalty of \$10,000.00 for each day each violation continued;

E. Ordering the Respondent to pay all costs, including expert witness, consultant and attorney fees, expended by the State in pursuit of this action; and

F. Ordering such other and further relief as the Board deems appropriate and just.

Respectfully submitted,

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

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

BY: /s/ Rachel R. Medina
RACHEL R. MEDINA, #6297171
Bureau Chief
Environmental Bureau
Assistant Attorney General

DATED: August 7, 2026

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

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on August 7, 2026, before 5:00 PM, she caused to be served by certified mail, a true and correct copy of the following instruments entitled Notice of Filing and Complaint to:

Gregory A. Veach
1400 North Wood Road, Suite 5
Murphysboro, Illinois 62966

Dylan P. Grady
Brown, Hay & Stephens
205 S. 5th Street, Suite 1000
Springfield, Illinois 62701

This transmission contains 18 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
Assistant Attorney General
Environmental Bureau