

NOV 08 2005

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

STATE OF ILLINOIS
Pollution Control Board

PAUL FREEMAN and FREEMAN)
 ENVIRONMENTAL SERVICES, INC.)
 Illinois Corporation,)
)
 Petitioner,)
)
 v.)
)
 ILLINOIS POLLUTION CONTROL BOARD)
 and PEOPLE OF THE STATE OF ILLINOIS,)
)
 Respondents.)

Petition for Review of
Notice of Administrative Citation

AC06-11

IEPA No. 350-05-AC

PETITION FOR REVIEW

Petitioner, PAUL FREEMAN and FREEMAN ENVIRONMENTAL SERVICES, INC. through their undersigned attorney files this Petition for Review of Administrative Citations and states as follows:

By this Petition for Review, Petitioners Paul Freeman and Freeman Environmental Services, Inc. state that there should be a finding that there has been no violation based upon the following:

- A. Petitioners did not cause or allow the alleged violations
- B. The alleged violations was the result of uncontrollable circumstances


and seek a determination with respect to the Administrative Citation in this cause and a reduction in the proposed civil penalties in accordance with 415 ILCS 5/31/1.

WHEREFORE, the Petitioners request that this Board set this matter for hearing regarding the IEPA's findings of Administrative Citation and impositions of civil penalties and after the hearing, enter an Order reversing the decision of the IEPA with respect to the Administrative Citation and civil

penalties; Petitioners further request that this Board grant such other and further relief as this Board deems just and appropriate.

Respectfully submitted,

PAUL FREEMAN and FREEMAN
ENVIRONMENTAL SERVICES, INC.
Petitioner

By: 
Robert C. Wilson, its attorney

Prepared by:
Robert C. Wilson
Attorney at Law
PO Box 544
117 West Poplar Street
Harrisburg IL 62946
618-252-1776
618-252-8222 - fax
ARDC #3128411
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NOTICE OF FILING AND PROOF OF SERVICE

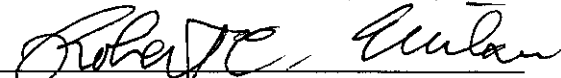
The undersigned certifies that an original and nine copies of Petitioners' Petition for Review was served upon the Clerk of the Illinois Pollution Control Board, and one copy was served upon the following party of record in this cause by enclosing same in envelopes addressed to:

Dorothy Gunn, Clerk
Illinois Pollution Control Board
James R. Thompson Center
100 W. Randolph St., Suite 11-500
Chicago, IL 60601

Attn: Division of Legal Counsel
Illinois Environmental Protection Agency
1021 N. Grand Ave. East
P.O. Box 19276
Springfield, IL 62794-9276

with postage fully prepaid, and by depositing said envelopes in a U.S. Post Office Mail Box in Harrisburg, Illinois on the 30 day of November, 2005, before 5:30 p.m..

PAUL FREEMAN and FREEMAN
ENVIRONMENTAL SERVICES, INC. ,Petitioner,

By: 
Robert C. Wilson, its attorney

Prepared by:
Robert C. Wilson Attorney at Law
PO Box 544 117 West Poplar Street
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NOTICE OF APPEARANCE

I, Robert C. Wilson, Attorney at Law, hereby enter my appearance on behalf of Petitioner, PAUL FREEMAN and FREEMAN ENVIRONMENTAL SERVICES, INC. in the above entitled cause.


Robert C. Wilson

Prepared by:
Robert C. Wilson
Attorney at Law
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