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Paul Christian Pratapas
Complainant,
vs.
Village of Lisle Highway Department
Respondent.

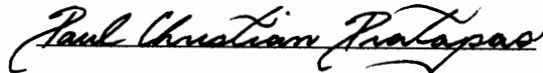
) Case No. 2023-013

NOTICE OF FILING

David S. Silverman
Jaime C. Such
ANCEL GLINK, P.C.
140 S. Dearborn Street, Sixth Floor
Chicago, IL 60603
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Please be advised that I have today filed with the Clerk of Illinois Pollution Control Board a motion to deny the motion for extension. A copy of which is herewith served upon you.

Dated November 8, 2022


Paul Christian Pratapas

1 Paul Pratapas
2 1330 E. Chicago Avenue, Unit 110
3 Naperville, IL 60540

4 **BEFORE THE ILLINOIS POLLUTION CONTROL BOARD**

6 Paul Christian Pratapas) Case No.: 2023-013
7 Complainant,)
8 vs.)
9 Village of Lisle Highway Department)
10 Respondent.)

11 _____
12 **RESPONDENTS MOTION FOR EXTENSION OF TIME**

13
14 Respondent has requested The Board grant an extension of time to November 21, 2022 to
15 file an answer and/or responsive pleading to Complainant's Amended Formal Complaint.
16

- 17 1. Complainant requests the motion be denied for the following reasons.
- 18 a. The clean water act NPDES program was passed 50 years ago in 1972 and after
19 50 years of time available, the Village of Lisle contractors were photographed
20 with absolute certainty having done absolutely nothing required of them to protect
21 the environment and residents where they were working.
 - 22 b. Furthermore, the Village and contractors didn't even know they had any
23 obligations under the Clean Water Act despite federal law requiring they know
24 and certify under penalty of law they accept consequences for all failures to
25 comply.
 - 26 c. Village Contractors were photographed threatening an EPA certified inspector of
27 stormwater who identified himself while standing in front of the toxic material
28

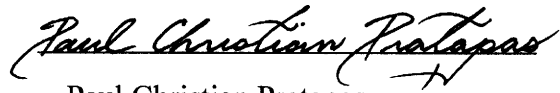
1 they were openly burying in peoples' front yards. As shown in photographic
2 evidence already submitted to the board.

- 3 d. After being confronted by an EPA certified stormwater inspector who identified
4 himself and who also used to work as a behavioral analyst in residential psych
5 facilities, Village of Lisle Highway Department Contractors denied any
6 wrongdoing while continuing to bury toxic material in residents' front yards
- 7 e. Complainant made several attempts to explain to managers on site who I was and
8 how they should maybe not talk so much given what they were saying and to who
9 and the only response I got was to be followed down the street, threatened and
10 told "man to man" how hard the work they were doing was. As shown in
11 photographic evidence already submitted to the board.
- 12 f. The Clean Water Act NPDES Program does not afford exemptions to permit
13 holders/contractors with a penis or busy lawyers.
- 14 g. At the end of the day, Village of Lisle Highway Department Contractors left the
15 site with open holes filled with toxic material which posed a long-term threat to
16 ground water and **immediate threat to any children**, animals and adults who
17 touched or ingested the toxic slurry containing around 90 toxic materials, many of
18 which are heavy metals. As shown in photographic evidence already submitted to
19 the board.
- 20 h. The days following the initial contact with me and a report to the Department
21 Commissioner, Village of Lisle Highway Department personnel took over the
22 work yet continued denying ANY wrongdoing and continued burying the toxic
23 material in open holes. As shown in photographic evidence already submitted to
24 the board.
- 25 i. This case and the behaviors by the permit holder and contractors are a golden
26 example of why citizens can file lawsuits against the EPA and other government
27 organizations for improper implementation.
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WHEREFORE, Complainant, PAUL CHRISTIAN PRATAPAS,
requests that the Illinois Pollution Control Board deny any and all motions for extension as long
as The Village of Lisle Highway Department is operating the Village's sidewalk and curb
replacement program.

Dated this 8th day of November 2022


Paul Christian Pratapas

CERTIFICATE OF SERVICE

Concerning: Formal Complaint, Village of Lisle Highway Department
Case Name: Paul Pratapas VS Village of Lisle Highway Department Case No.: 2023-013

Method of Service:

- First-Class Mail
- Registered Mail (Copy of Receipt Attached)
- Certified Mail (Copy of Receipt to be filed within 7 days of receiving)
- Fax
- Electronic Service
- Personal Service
- After all due diligence, I was unable to locate and serve the targeted person(s).

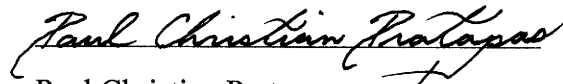
TO:

Don A. Brown
Clerk of the Board
Illinois Pollution Control Board
60 E. Van Buren Street, Ste. 630
Chicago, IL 60605
Don.Brown@illinois.gov

David S. Silverman
Jaime C. Such
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Bradley P. Halloran
Hearing Officer
Illinois Pollution Control Board
60 E. Van Buren Street, Ste. 630
Chicago, IL 60605
Brad.Halloran@illinois.gov

Date of Service via Email: November 8, 2022


Paul Christian Pratapas