

07/02/2023

IPCB 2023-083

Paul Christian Pratapas
Complainant

v

Steeple Run Elementary School; and
Ozinga Concrete Yard 281
Respondents

COMPLAINANTS MOTION FOR EXTENSION TO FILE POS FOR OZINGA CONCRETE YARD 281

WHEREAS The Board set a July 3, 2023 deadline to refile the POS for the formal complaint IPCB 2023-03 originally served at the local Naperville offices for Ozinga Concrete Yard 281

WHEREAS Ozinga Concrete is named in two other formal complaints with the board, including being photographed washing out their trucks directly into a curbside inlet at a site which itself is part of two formal complaints with The Board

WHEREAS Ozinga Concrete was photographed washing out on the active playground of Steeple Run Elementary School as part of this complaint

WHEREAS Ozinga Concrete was photographed burying their concrete washout while pouring the foundation(s) for the project at Steeple Run Elementary School

WHEREAS the project site did not have required signage posted for determining permit info

WHEREAS Complainant has expended significant time and money addressing violations by Ozinga and their industry partners

WHEREAS Complainant currently cannot afford to re-serve Respondent via certified mail

WHEREAS Complainant still has not been able to identify a registered agent to receive service

COMPLAINANT REQUESTS AN EXTENSION TO FILE THE REMAINING POS FOR OZINGA CONCRETE YARD 281 AND FOR OZINGA CONCRETE YARD 281 TO PROVIDE A NAME AND ADDRESS TO RECEIVE SERVICE

 *Paul Christian Pratapas* July 2, 2023

Paul Christian Pratapas
1779 Kirby Parkway, Ste 1, #92
Memphis, TN 38138
630.210.1637

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

PAUL CHRISTIAN PRATAPAS,)

Complainant,)

) PCB No: 23-83

v.) (Citizens Enforcement – Water))

,)
STEEPLE RUN ELEMENTARY SCHOOL; and
OZINGA CONCRETE YARD 281)

)
Respondents)

)

NOTICE OF FILING

TO: See Attached Service List

PLEASE TAKE NOTICE that on 07/02/2023, PAUL CHRISTIAN PRATAPAS electronically filed with the Office of the Clerk of the Illinois Pollution Control Board

MOTION FOR EXTENSION TO FILE POS, a copy of which is hereby served upon you.

Paul Christian Pratapas
Complainant

 7/2/23

Paul Christian Pratapas
paul.pratapas@gmail.com
1779 Kirby Parkway, STE 1-92
Memphis, TN 38138
630.210.1637

CERTIFICATE OF SERVICE

I, Paul Christian Pratapas, certify that I caused the foregoing MOTION FOR EXTENSION TO FILE POS to be served all parties of record, as shown below:

Paul Christian Pratapas
paulpratapas@gmail.com
1779 Kirby Parkway, Ste 1, #92
Memphis, Tennessee 38138

Illinois Pollution Control Board
Don Brown - Clerk of the Board
don.brown@illinois.gov
100 W. Randolph St. Suite 11-500
Chicago, Illinois 60601
(312)-814-3620

Kenneth M. Florey
kflorey@robbins-schwartz.com
55 W Monroe, Suite 800
Chicago, IL 60603
Robbins Schwartz Nicholas Lifton and Taylor LTD
(312)-332-7760

Hinshaw & Culbertson LLC
Richard S. Porter
rporter@hinshawlaw.com
100 Park Ave., PO Box 1389
Rockford, IL 61105
(815)-490-4947

by causing a copy of same to be sent via email transmission to the email addresses reflected above, on the Second day of June, 2023.

Paul Christian Pratapas

Complainant

Paul Christian Pratapas 7/2/23