

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

Paul Christian Pratapas,)

)

Complainant,)

) PCB No: 23-071

v.) (Citizens Enforcement – Water))

)

,)

)

Respondents)

The Village of Woodridge)

RESPONDENT’S RESPONSES TO INTERROGATORIES

1. Identify all Persons who provided the information used and provided in answering these Interrogatories. For each Person identified, state the specific Interrogatories that each Person assisted in answering and describe the nature of their assistance.

ANSWER: **Paul Christian Pratapas BS, MS, ,**

2. Identify any Person who can support the claims you allege by the Person’s name, address, phone number, and email address.

ANSWER: **Jim Berry BS, MS, PhD, J.D.
Elmhurst College
jimb@elmhurst.edu**

3. Identify whether Complainant has had any conversations with another Person or party regarding the allegations in the Complaint.

ANSWER: **The Chief of Woodridge Police, nice lady at Woodridge Police Department window, a foreign diplomat from our friends in the middle east The Kingdom of Qatar, a senior PR rep for a major National US news media outlet, artists from the music industry, Cameraman for Dateline NBC, FedEx and a City of Lombard patrol officer.**

4. Identify and describe the specific acts Complainant believes the Village of Woodridge has committed that violate Illinois Law.

ANSWER: Should have consulted a regulatory specialist and conducted a risk assessment. Well, I'm not a lawyer nor have I ever attended law school, but failure to post regulatory signage including permit number and address and contact person in a clear spot, typically by entrance. Given the previous statement, the construction trailer should have been accessible and not on the active construction site without a stabilized path. Multiple reservoirs for mortar were sitting on the ground with no protection. Tools related to mortar work cleaned and water freely allowed to contact ground via gravity. A Police Deputy assisted a contractor in intimidating a citizen collecting information about a prohibited discharge onto a DuPage County road for the purpose of asking the government for relief. Fraudulent completion of SWPPP permit inspection reports because of the state of the site and build and time requirements for completing corrective actions. If any publicly traded companies used fraudulent inspection reports to avoid regulatory spending and then reported that money as earnings to boost stock price. That is a continuing criminal enterprise, AKA a racket and prohibited by federal law. Possible violation of Canadian Geese equity as protected by the Migratory Bird Act by way of The IL Environmental Protection Act by way of the NPDES SWPPP permit requirements.

5. Identify and describe in detail any facts that support your position that the Village of Woodridge discharged excessive pollutants, including:

Discharge of toxic concrete/mortar washout:

The mortar equipment was sitting directly on the ground and the entire mortar work area was with out BMPs. It was also missing rain covers, which is why the public is allowed to see the SWPPP reports. So, I can assess the rain data and tell lawyers the facts instead of make interpretations based on industry experience and logic. Permittee left concrete trucks on site after washing out onto public roads and I took pictures.

Discharge of sediments:

The construction entrance was not stabilized and the baskets for inlets stop sediment not sediment laden water. Given the size of equipment and construction activities they were completing, gravity dictates such.

Any other pollutants you allege are released in excess:

I don't know because of the ILEPA's implantation of the program. Contractors have no idea of the requirements or their obligations and requesting documents and site inspections has unjustly created safety issues for me, including with uninformed Police.

6. Identify and describe in detail any facts that support Complainant's position that

Respondent has violated its permit, including:

- a. Any and all documents that support your claim.

ANSWER: We don't know because of the ILEPA's implementation of the program has undermined the primary enforcement mechanism and access to the SWPPP binder. A violation of my Constitutional rights. Rain data would be checked against BMPs on the construction progress map against the build progress etc.. And I would check how much toward the minimum SWPPP requirements were met and how this impacted understanding compliance expectations and requirements. And Respondent would not have the signage on the map, nor would there be any work orders or receipts and the superintendent wouldn't even know it was required or that there were ways around the ILEPA for citizens to initiate enforcement.

7. Identify and describe any facts that support Complainant's position that there were fraudulent SWPPP Inspection reports and contractor certifications, including:

- a. Any and all documents that support your claim.

ANSWER: As I mentioned earlier, corrective actions have a timeline for being addressed without cause. Given the state of the site and what was being done against what had been completed. There is no way to be that far into the build with so many of those specific violations without fraudulently having said there were not corrective actions along the way.

8. Identify and describe any facts that support your position that the site does not have a stabilized construction entrance.

ANSWER: It was the only part of the site I saw close up and three inch stone is pretty easy to spot close up. I am not aware of any dirt camouflage BMPs I may have missed.

9. Identify and describe any facts that support your position that Respondent has violated:

- a. NPDES Permit ILR10, including each "Part" of ILR10 as attached to your proposed Amendment to your Complaint; and
- b. 2017 NPDES General Permit for Discharges From Construction Activities, as attached to your proposed Amendment to your Complaint.

ANSWER: I took pictures of specific things so we wouldn't have to argue over what the Village did or did not do. Again, I should have been given access to the SWPPP book in order to properly answer this question and petition the government for relief.

10. Identify and describe the exact location of each photograph attached to the Complaint.

ANSWER: All photos were taken at the un-stabilized construction entrance where the regulatory signage and permit number should have been clearly visible

11. Identify and describe in detail how Complainant was intimidated by the Woodridge Police Department including:

- a. The date and time of the alleged occurrence(s); b. The name or badge number of the police officer(s) who intimidated the Complainant; and
- c. The specific actions that caused Complainant to feel intimidated.

ANSWER:

- a. **See dismissed Formal Complaint or police records**
- b. **See dismissed Formal Complaint or police records**
- c. **Siding with contractor who was illegally discharging a prohibited substance onto a county road and condoning the prohibited act. Stating it would have been OK for that permitted contractor to call the police on me for gathering info from public property for the purpose of petitioning the government for relief. Making false police reports is a violation of IL disorderly conduct laws and the contractor is required to be "competent" to access the site and work. Implied authority is dangerous. The girl who has cut my hair for years told me a Woodridge Police officer stalked and harassed her while in uniform after she called the department for help with another male stalker. Something she frequently has problems with while operating a small business on the same road in Woodridge as this incident. And I am somewhat uniquely qualified to assess her honesty in those statements.**

12. Identify the source of law that grants the Illinois Pollution Control Board ("PCB") the authority to grant Complainant the relief he seeks, including:

- a. PCB's authority to void the permit;
- b. PCB's authority to assess a financial civil penalty; and
- c. PCB's authority to order a study assessing migration patterns of Canadian

ANSWER:

- a. **I copied and pasted language from the town of Glenview who filed against ILEPA for repeated failure to properly implement a permit program despite knowing issues**
- b. **I copied and pasted from The Board's website and the town of Glenview's complaint**
- c. **I copied and pasted from The Board's website and applied to Canadian Geese which are a protected migratory bird who have seen their equity in the State of IL and the US replaced in favor of continuous corporate developments, migratory latinos and refuges.**

VERIFICATION

Under penalties as provided by law pursuant to 735 ILCS 5/1-109, the undersigned confirms that the statements set forth in this instrument are true and correct, except as to matters therein stated to be upon information and belief, and, as to such matters, the undersigned states that he verily believes the same to be true.


PAUL CHRISTIAN PRATAPAS
US Citizen

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