

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. 24-
)	(Enforcement – Land)
CLEAN CUT LAWN CARE, LLC,)	
an Illinois limited liability company,)	
)	
Respondent.)	

NOTICE OF FILING

TO: Persons on 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 Complaint, a true and correct copy of which is attached hereto 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.

Respectfully submitted,

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

By: /s/ Rebecca Kanz
Rebecca Kanz
Assistant Attorney General
Environmental Bureau
Illinois Attorney General's Office
69 W. Washington St., 18th Floor
Chicago, Illinois 60602
(312) 814-3532
Rebecca.Kanz@ilag.gov

Dated: January 31, 2024

Service List

Sally J. O'Connor, Registered Agent
Clean Cut Lawn Care LLC
93 N. 5000 W. Road
Kankakee, IL 60901

CERTIFICATE OF SERVICE

I, Rebecca Kanz, an Assistant Attorney General, certify that on the 31st day of January, 2024, I caused to be served the foregoing Notice of Filing and Complaint on the parties named on the attached Service List, by certified mail with return receipt.

/s/ Rebecca Kanz
Rebecca Kanz
Assistant Attorney General
Environmental Bureau
Illinois Attorney General's Office
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COMPLAINT

Complainant, PEOPLE OF THE STATE OF ILLINOIS, by KWAME RAOUL, Attorney General of the State of Illinois (“Complainant”), complains of Respondent, CLEAN CUT LAWN CARE, LLC, an Illinois limited liability company, as follows:

COUNT I
OPEN DUMPING OF WASTE

1. This Complaint 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”), against Respondent CLEAN CUT LAWN CARE, LLC, an Illinois limited liability company (“Clean Cut”), pursuant to Section 31 of the Illinois Environmental Protection Act (“Act”), 415 ILCS 5/31 (2022).

2. Illinois EPA is an administrative agency of the State of Illinois created pursuant to Section 4 of the Act, 415 ILCS 5/4 (2022), and charged, *inter alia*, with the duty of enforcing the Act.

3. At all times relevant to this Complaint, Clean Cut was and is an Illinois limited liability company authorized to transact business in Illinois.

4. At all times relevant to this Complaint, Clean Cut owned and operated, and continues to own and operate, a clean construction or demolition debris recycling facility located at 222 S. 5000W Road, Limestone Township, Kankakee County, Illinois 60901 (“Facility”).

5. At all times relevant to this Complaint, Clean Cut also owned and operated, and continues to own and operate, a lawncare and landscaping business located approximately a half-mile Northwest of the Facility, at 93 N. 5000 Road W, Limestone Township, Kankakee County, Illinois 60901.

6. On June 12, 2019, Illinois EPA inspected the Facility. At the time of the inspection, there was an 80 cubic yard pile of compost and plant debris, including but not limited to, grass cuttings, leaves, and tree limbs (“the Pile”).

7. At the time of the June 12, 2019 inspection, the Pile consisted of material generated off-site from Clean Cut’s landscaping business. At least some of the Pile had been at the Facility, uncovered and exposed to the elements for at least twenty months.

8. At the time of the June 12, 2019 inspection, there were two roll-off boxes filled with dry wall, wood, window frames, a light fixture, and other miscellaneous debris at the Facility, including debris that has been generated off-site.

9. At the time of the June 12, 2019 inspection, there was a small pile of charred and stockpiled brush, tree stumps, and hay, which was also generated off-site.

10. On May 1, 2020, the local fire protection district responded to a fire at the Facility and reported a large pile of burning trees and shrubs, along with sections of a roof and shingles from a small well structure located at the front of the Facility.

11. On September 22, 2022, Illinois EPA performed a follow-up inspection at the Facility. At the time of the September 22, 2022 inspection, the Pile was no longer present, however

there were two roll-off boxes at the Facility, one of which was filled with various discarded materials.

12. Illinois EPA designated areas of concern at the Facility that it believed may contain buried debris based on information Illinois EPA received from a citizen complainant. Illinois EPA designated the areas as Areas A, B, C, and D. Area A and Area B were located on the northern part of the Facility, and Area C and Area D were located south of Area A and Area B in the central part of the Facility.

13. On September 29, 2022, at the request of Illinois EPA, Clean Cut excavated Areas A, B, and C. Area C contained buried debris, including one piece of rebar, concrete, asphalt, soil, several pieces of metal, a piece of charred tree, and a piece of fabric (“Buried Material”). Due to time constraints, Clean Cut did not excavate Area D.

14. As of the date of this Complaint, Clean Cut has not excavated Area D.

15. On September 29, 2022, there was primed and painted wood trim in the burn pile at the Facility, a toilet from off-site in one of the roll-off boxes, and grass from off-site spread on the ground.

16. Section 21(a) of the Act, 415 ILCS 5/21(a) (2022), provides, in pertinent part, as follows:

No person shall:

(a) Cause or allow the open dumping of any waste.

17. Section 3.315 of the Act, 415 ILCS 5/3.315 (2022), provides, as follows:

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

18. Clean Cut, a limited liability company, is a “person” as that term is defined by Section 3.315 of the Act, 415 ILCS 5/3.315 (2022).

19. Section 3.305 of the Act, 415 ILCS 5/3.305 (2022), provides the following definition:

“Open Dumping” means the consolidation of refuse from one or more sources at a disposal site that does not fulfill the requirements of a sanitary landfill.

20. Section 3.385 of the Act, 415 ILCS 5/3.385 (2022), provides the following definition:

“Refuse” means waste.

21. Section 3.535 of the Act, 415 ILCS 5/3.535 (2022), provides, in pertinent part, the following definition:

“Waste” means any garbage . . . or any other discarded material, including any solid, liquid, semi-solid, or contained gaseous material resulting from industrial, commercial, mining and agricultural operations, and from community activities

22. Section 3.270 of the Act, 415 ILCS 5/3.270 (2022) provides the following definition:

“Landscape waste” means all accumulations of grass or shrubbery cuttings, leaves, tree limbs and other materials accumulated as the result of the care of lawns, shrubbery, vines and trees.

23. The Pile consisted of an accumulation of grass cuttings, leaves, and tree limbs accumulated as the result of the care of lawns, shrubbery, vines and trees, and was therefore “Landscape waste” as defined by Section 3.270 of the Act, 415 ILCS 5/3.270 (2022).

24. The Pile, Buried Material, miscellaneous debris and other materials in the roll-off boxes, including the toilet, and the primed and painted wood trim, grass, brush, shrubs, hay, trees, tree stumps, and roof and shingles discarded at the Facility are “waste” as that term is defined by Section 3.535 of the Act, 415 ILCS 5/3.535 (2022), and therefore also “refuse” as defined by Section 3.385 of the Act, 415 ILCS 5/3.385 (2022).

25. Section 3.185 of the Act, 415 ILCS 5/3.185 (2022), provides as follows:

“Disposal” means the discharge, deposit, injection, dumping, spilling, leaking or placing of any waste or hazardous waste into or on any land or water or into any well so that such waste or hazardous waste or any constituent thereof may enter the environment or be emitted into the air or discharged into any waters, including ground waters.

26. Section 3.460 of the Act, 415 ILCS 5/3.460 (2022), provides as follows:

“Site” means any location, place, tract of land, and facilities, including but not limited to buildings, and improvements used for purposes subject to regulation or control by this Act or regulations thereunder.

27. Clean Cut caused and/or allowed the deposition and/or placement of waste at the Facility in a manner that exposed the waste to the environment. The Facility is therefore a “disposal site” as defined in Sections 3.185 and 3.460 of the Act, 415 ILCS 5/3.185 and 3.460 (2022).

28. Section 3.445 of the Act, 415 ILCS 5/3.445 (2022), provides, in pertinent part, as follows:

“Sanitary landfill” means a facility permitted by the Agency for the disposal of waste on land meeting the requirements of the Resource Conservation and Recovery Act, P.L 94-580

29. At all times relevant to this Complaint, the Facility was not permitted by Illinois EPA for the disposal of waste, and thus did not fulfill the requirements of a “sanitary landfill” as defined by Section 3.445 of the Act, 415 ILCS 5/3.445 (2022).

30. From at least June 12, 2019, and continuing to a time better known to Clean Cut, Clean Cut has allowed the consolidation of waste to continue at the Facility, which does not meet the requirements of a sanitary landfill, and therefore caused or allowed the open dumping of waste in violation of Section 21(a) of the Act, 415 ILCS 5/21(a) (2022).

WHEREFORE, Complainant, PEOPLE OF THE STATE OF ILLINOIS, respectfully requests that the Board enter an Order against Respondent, CLEAN CUT LAWN CARE, LLC, an Illinois Limited Liability Company, with respect to Count I:

1. Authorizing a hearing in this matter at which time Clean Cut will be required to answer the allegations herein;
2. Finding that Clean Cut has violated Section 21(a) of the Act, 415 ILCS 5/21(a) (2022);
3. Ordering Clean Cut to cease and desist from any future violations of Section 21(a) of the Act, 415 ILCS 5/21(a) (2022);
4. Assessing against Clean Cut a civil penalty of Fifty Thousand Dollars (\$50,000.00) for each day of violation of the Act and pertinent regulations, and an additional civil penalty of Ten Thousand Dollars (\$10,000.00) for each day the violations continued;
5. Taxing all costs in this action, including, but not limited to, attorney, expert witness and consultant fees, against Clean Cut; and
6. Granting such other relief as the Board deems appropriate and just.

COUNT II
OPEN DUMPING OF WASTE IN A MANNER CAUSING LITTER

- 1-28. Complainant re-alleges and incorporates by reference herein paragraphs 1 through 13, 15, and 17 through 30 of Count I, as paragraphs 1 through 28 of this Count II.
29. Section 21(p)(1) of the Act, 415 ILCS 5/21(p) (2022), provides, in pertinent part, as follows:

No person shall:

* * *

- (p) In violation of subdivision (a) of this Section, cause or allow the open dumping of any waste in a manner which results in any of the following occurrences at the dump site:

* * *

1. litter

* * *

30. Section 3(a) of the Litter Control Act, 415 ILCS 105/3(a) (2022), provides as follows:

- (a) “Litter” means any discarded, used or unconsumed substance or waste. “Litter” may include, but is not limited to, any garbage, trash, refuse, cigarettes, debris, rubbish, grass clippings or other lawn or garden waste, newspaper, magazines, glass, metal, plastic or paper containers or other packaging construction material, abandoned vehicle (as defined in the Illinois Vehicle Code), motor vehicle parts, furniture, oil, carcass of a dead animal, any nauseous or offensive matter of any kind, any object likely to injure any person or create a traffic hazard, potentially infectious medical waste as defined in Section 3.360 of the Environmental Protection Act, or anything else of an unsightly or unsanitary nature, which has been discarded, abandoned or otherwise disposed of improperly.

31. Clean Cut’s discarded debris consisting of the Pile, Buried Material, miscellaneous debris and other materials in the roll-off boxes, including the toilet, and the primed and painted wood trim, grass, brush, shrubs, hay, trees, tree stumps, and roof and shingles constitute “litter” as that term is defined by Section 3(a) of the Litter Control Act, 415 ILCS 105/3(a) (2022).

32. Clean Cut, by its actions as alleged herein, caused or allowed the open dumping of waste at the Facility, resulting in litter, thereby violating Section 21(p)(1) of the Act, 415 ILCS 21(p)(1) (2022).

WHEREFORE, Complainant, PEOPLE OF THE STATE OF ILLINOIS, respectfully requests that the Board enter an Order against Respondent, CLEAN CUT LAWN CARE, LLC, an Illinois Limited Liability Company, with respect to Count II:

1. Authorizing a hearing in this matter at which time Clean Cut will be required to answer the allegations herein;

2. Finding that Clean Cut has violated Section 21(p)(1) of the Act, 415 ILCS 5/21(p)(1) (2022);

3. Ordering Clean Cut to cease and desist from any future violations of Section 21(p)(1) of the Act, 415 ILCS 5/21(p)(1) (2022);

4. Assessing against Clean Cut a civil penalty of Fifty Thousand Dollars (\$50,000.00) for each day of violation of the Act and pertinent regulations, and an additional civil penalty of Ten Thousand Dollars (\$10,000.00) for each day the violations continued;

5. Taxing all costs in this action, including, but not limited to, attorney, expert witness and consultant fees, against Clean Cut; and

6. Granting such other relief as the Board deems appropriate and just.

COUNT III
CONDUCTING A WASTE DISPOSAL OPERATION WITHOUT A PERMIT

1-21. Complainant re-alleges and incorporates by reference herein, paragraphs 1 through 13, 15, 17 through 18, and 21 through 25 of Count I, as paragraphs 1 through 21 of this Count III.

22. Section 21(d)(1) of the Act, 415 ILCS 5/21(d)(1) (2022), provides, in pertinent part, as follows:

No person shall:

* * *

(d) Conduct any waste-storage, waste-treatment, or waste-disposal operation:

(1) without a permit granted by the Agency or in violation of any conditions imposed by such permit

* * *

23. As of the date of filing of this Complaint, Illinois EPA has not issued a permit to Clean Cut authorizing waste-disposal operations at the Facility.

24. On at least June 12, 2019, September 22, 2022, and September 29, 2022, and such other dates better known to Clean Cut, Clean Cut disposed of waste at the Facility, and thereby

conducted a waste-disposal operation without having applied for and obtained a permit from Illinois EPA.

25. By conducting a waste-disposal operation without a permit from Illinois EPA, Clean Cut violated Section 21(d)(1) of the Act, 415 ILCS 5/21(d)(1) (2022).

WHEREFORE, Complainant, PEOPLE OF THE STATE OF ILLINOIS, respectfully requests that the Board enter an Order against Respondent, CLEAN CUT LAWN CARE, LLC, an Illinois Limited Liability Company, with respect to Count III:

1. Authorizing a hearing in this matter at which time Clean Cut will be required to answer the allegations herein;

2. Finding that Clean Cut has violated Section 21(d)(1) of the Act, 415 ILCS 5/21(d)(1) (2022);

3. Ordering Clean Cut to cease and desist from any future violations of Section 21(d)(1) of the Act, 415 ILCS 5/21(d)(1) (2022);

4. Assessing against Clean Cut a civil penalty of Fifty Thousand Dollars (\$50,000.00) for each day of violation of the Act and pertinent regulations, and an additional civil penalty of Ten Thousand Dollars (\$10,000.00) for each day the violations continued;

5. Taxing all costs in this action, including, but not limited to, attorney, expert and consultant fees, against Clean Cut; and

6. Granting such other relief as the Board deems appropriate and just.

COUNT IV
WASTE DISPOSAL AT AN UNPERMITTED FACILITY

1-22. Complainant re-alleges and incorporates by reference herein, Paragraphs 1 through 13, 15, 17 through 18, and 21 through 25 Count I, and Paragraph 23 of Count III, as Paragraphs 1 through 22 of this Count IV.

23. Section 21(e) of the Act, 415 ILCS 5/21(e) (2022), provides, in pertinent part, as follows:

No person shall:

* * *

- (e) Dispose, treat, store, or abandon any waste, or transport any waste into this State for disposal, treatment, storage or abandonment, except at a site or facility which meets the requirements of this Act and of regulations and standards thereunder.

24. On at least June 12, 2019, September 22, 2022 and September 29, 2022, and such other dates better known to Clean Cut, Clean Cut disposed of and/or abandoned waste at the Site, which was not permitted for waste disposal by Illinois EPA, and therefore did not meet the requirements of the Act. Clean Cut thereby violated Section 21(e) of the Act, 415 ILCS 5/21(e) (2022).

WHEREFORE, Complainant, PEOPLE OF THE STATE OF ILLINOIS, respectfully requests that the Board enter an Order against Respondent, CLEAN CUT LAWN CARE, LLC, an Illinois Limited Liability Company, with respect to Count IV:

1. Authorizing a hearing in this matter at which time Clean Cut will be required to answer the allegations herein;
2. Finding that Clean Cut has violated Section 21(e) of the Act, 415 ILCS 5/21(e) (2022);
3. Ordering Clean Cut to cease and desist from any future violations of Section 21(e) of the Act, 415 ILCS 5/21(e) (2022);
4. Assessing against Clean Cut a civil penalty of Fifty Thousand Dollars (\$50,000.00) for each day of violation of the Act and pertinent regulations, and an additional civil penalty of Ten Thousand Dollars (\$10,000.00) for each day the violations continued;

5. Taxing all costs in this action, including, but not limited to, attorney, expert witness and consulting fees, against Clean Cut; and

6. Granting such other relief as the Board deems appropriate and just.

COUNT V
LANDSCAPE WASTE COMPOSTING AT AN UNPERMITTED FACILITY

1-11. Complainant re-alleges and incorporates by reference herein Paragraphs 1 through 7, 17 through 18, and 22 through 23 of Count I as Paragraphs 1 through 11 of this Count V.

12. Section 21(q) of the Act, 415 ILCS 5/21(q) (2022), provides, in pertinent part, as follows:

No person shall:

* * *

(q) Conduct a landscape waste composting operation without an Agency permit

* * *

13. The Pile, which consisted of grass, leaves, tree limbs, and brush constitutes “landscape waste” as that term is defined in Section 3.270 of the Act, 415 ILCS 5/3.270 (2022).

14. Section 3.155 of the Act, 415 ILCS 5/3.155 (2022), provides as follows:

“Composting” means the biological treatment process by which microorganisms decompose the organic fraction of waste, producing compost.

15. As alleged herein, the Pile at the Facility was undergoing decomposition of the organic material contained in it, and therefore constitutes “composting” as that term is defined in Section 3.155 of the Act, 415 ILCS 5/3.155 (2022).

16. As of the date of filing of this Complaint, Illinois EPA has not issued a permit to Clean Cut authorizing landscape waste composting operations at the Facility.

17. On a date best known to Clean Cut, through at least June 12, 2019, and such other

dates better known to Clean Cut, Clean Cut conducted a landscape waste composting operation without having applied for and obtained a permit from Illinois EPA in violation of Section 21(q) of the Act, 415 ILCS 5/21(q) (2022).

WHEREFORE, Complainant, PEOPLE OF THE STATE OF ILLINOIS, respectfully requests that the Board enter an Order against Respondent, CLEAN CUT LAWN CARE, LLC, an Illinois Limited Liability Company, with respect to Count V:

1. Authorizing a hearing in this matter at which time Clean Cut will be required to answer the allegations herein;

2. Finding that Clean Cut has violated Section 21(q) of the Act, 415 ILCS 5/21(q) (2022);

3. Ordering Clean Cut to cease and desist from any future violations of Section 21(q) of the Act, 415 ILCS 5/21(q) (2022);

4. Assessing against Clean Cut a civil penalty of Fifty Thousand Dollars (\$50,000.00) for each day of violation of the Act and pertinent regulations, and an additional civil penalty of Ten Thousand Dollars (\$10,000.00) for each day the violations continued;

5. Taxing all costs in this action, including, but not limited to, expert witness and consultant fees against Clean Cut; and

6. Granting such other relief as the Board deems appropriate and just.

COUNT VI
OPEN BURNING OF WASTE

1-15. Complainant re-alleges and incorporates by reference herein Paragraphs 1 through 5, 9 through 10, 15, 17 through 18, and 20 through 24 of Count I as Paragraphs 1 through 15 of this Count VI.

16. Section 9(c) of the Act, 415 ILCS 5/9(c) (2022), provides, in pertinent part, as follows:

No person shall:

* * *

(c) Cause or allow the open burning of refuse

* * *

17. Section 3.300 of the Act, 415 ILCS 5/3.300 (2022), provides the following definition:

“Open burning” is the combustion of any matter in the open or in an open dump.

18. On at least June 12, 2019, May 1, 2020, and September 29, 2022, or on such other dates better known to Clean Cut, brush, a large pile of trees and shrubs, a tree stump, tree limbs, hay, several pieces of primed and painted wood trim, and sections of a roof and shingles from a well structure located at the front of the Facility were combusted in the open, and therefore constitute “open burning” as that term is defined in Section 3.300 of the Act, 415 ILCS 5/3.300 (2022).

19. On at least June 12, 2019, May 1, 2020, and September 29, 2022, or on such other dates better known to Clean Cut, Clean Cut caused or allowed the open burning of waste at the Facility in violation of Section 9(c) of the Act, 415 ILCS 5/9(c) (2022).

WHEREFORE, Complainant, PEOPLE OF THE STATE OF ILLINOIS, respectfully requests that the Board enter an Order against Respondent, CLEAN CUT LAWN CARE, LLC, an Illinois Limited Liability Company, with respect to Count VI:

1. Authorizing a hearing in this matter at which time Clean Cut will be required to answer the allegations herein;

2. Finding that Clean Cut has violated Section 9(c) of the Act, 415 ILCS 5/9(c) (2022);
3. Ordering Clean Cut to cease and desist from any future violations of Section 9(c) of the Act, 415 ILCS 5/9(c) (2022);
4. Assessing against Clean Cut a civil penalty of Fifty Thousand Dollars (\$50,000.00) for each day of violation of the Act and pertinent regulations, and an additional civil penalty of Ten Thousand Dollars (\$10,000.00) for each day the violations continued;
5. Taxing all costs in this action, including, but not limited to, attorney, expert witness and consultant fees, against Clean Cut; and
6. Granting such other relief as the Board deems appropriate and just.

COUNT VII
OPEN DUMPING OF WASTE RESULTING IN OPEN BURNING

1-25. Complainant re-alleges and incorporates by reference herein Paragraphs 1 through 5, 9 through 10, and 15 through 30 of Count I, and Paragraphs 17 through 18 of Count VI, as Paragraphs 1 through 25 of this Count VII.

26. Section 21(p)(3), 415 ILCS 5/21(p)(3) (2022), of the Act provides, in pertinent part, as follows:

No person shall:

* * *

- (p) in violation of subdivision (a) of this Section, cause or allow the open dumping of any waste in a manner which results in any of the following occurrences at the dump site:

* * *

- (3) open burning.

27. On at least June 12, 2019 and May 1 and September 29, 2020, and such other dates better known to Clean Cut, Clean Cut caused or allowed open dumping which resulted in open burning, thereby violating Section 21(p)(3) of the Act, 415 ILCS 5/21(p)(3) (2022).

WHEREFORE, Complainant, PEOPLE OF THE STATE OF ILLINOIS, respectfully requests that the Board enter an Order against Respondent, CLEAN CUT LAWN CARE, LLC, an Illinois Limited Liability Company, with respect to Count VII:

1. Authorizing a hearing in this matter at which time Clean Cut will be required to answer the allegations herein;

2. Finding that Clean Cut has violated Section 21(p)(3) of the Act, 415 ILCS 5/21(p)(3) (2022);

3. Ordering Clean Cut to cease and desist from any future violations of Section 21(p)(3) of the Act, 415 ILCS 5/21(p)(3) (2022);

4. Assessing against Clean Cut a civil penalty of Fifty Thousand Dollars (\$50,000.00) for each day of violation of the Act and pertinent regulations, and an additional civil penalty of Ten Thousand Dollars (\$10,000.00) for each day the violations continued;

5. Taxing all costs in this action, including, but not limited to, attorney, expert witness and consultant fees, against Clean Cut; and

6. Granting such other relief as the Board deems appropriate and just.

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/ Stephen J. Sylvester
STEPHEN J. SYLVESTER, Chief
Environmental Bureau
Assistant Attorney General

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