

**BEFORE THE POLLUTION CONTROL BOARD  
OF THE STATE OF ILLINOIS**

MARINE BANK SPRINGFIELD TRUST #53-0051,	)	
Petitioner,	)	
	)	
v.	)	PCB 2024-081
	)	(LUST Appeal)
ILLINOIS ENVIRONMENTAL	)	
PROTECTION AGENCY,	)	
Respondent.	)	

**NOTICE**

Don Brown, Clerk  
Illinois Pollution Control Board  
60 E. Van Buren Street  
Suite 630  
Chicago, IL 60605  
[don.brown@illinois.gov](mailto:don.brown@illinois.gov)

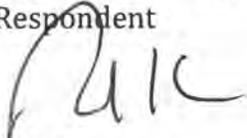
Carol Webb, Hearing Officer  
Illinois Pollution Control Board  
1021 North Grand Avenue East  
P.O. Box 19274  
Springfield, IL 62794-9274  
[carol.webb@illinois.gov](mailto:carol.webb@illinois.gov)

Patrick D. Shaw  
Law Office of Patrick D. Shaw  
80 Bellerive Road  
Springfield, IL 62704  
[pdshaw1law@gmail.com](mailto:pdshaw1law@gmail.com)

**PLEASE TAKE NOTICE** that I have today filed with the office of the Clerk of the Pollution Control Board **ILLINOIS EPA'S RESPONSE TO PETITIONER'S MOTION FOR SUMMARY JUDGMENT**, copies of which are herewith served upon you.

Respectfully submitted,

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY,  
Respondent



Rich Kim  
Assistant Counsel/Special Assistant Attorney General  
Division of Legal Counsel  
2520 West Iles Avenue  
P.O. Box 19276  
Springfield, Illinois 62794-9276  
217/782-5544  
Dated: April 2, 2025

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MARINE BANK SPRINGFIELD TRUST #53-0051,	)	
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**ILLINOIS EPA'S RESPONSE TO PETITIONER'S MOTION OF SUMMARY JUDGMENT**

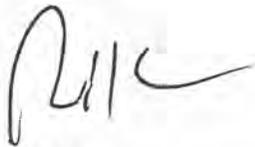
**NOW COMES** the Respondent, the Illinois Environmental Protection Agency ("Illinois EPA" or "Agency"), by one of its attorneys, Rich Kim, Assistant Counsel and Special Assistant Attorney General, and hereby submits **ILLINOIS EPA'S RESPONSE TO PETITIONER'S MOTION FOR SUMMARY JUDGMENT** to the Illinois Pollution Control Board ("Board").

The Agency has no objection to Petitioner's Motion for Summary Judgment.

Respectfully submitted,

**ILLINOIS ENVIRONMENTAL PROTECTION AGENCY,**

Respondent



Rich Kim  
Assistant Counsel/Special Assistant Attorney General  
Division of Legal Counsel  
2520 West Iles Avenue  
P.O. Box 19276  
Springfield, Illinois 62794-9276  
217/782-5544  
Dated: April 2, 2025

This filing submitted on recycled paper.

**CERTIFICATE OF SERVICE**

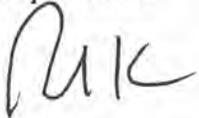
I, the undersigned attorney at law, hereby certify that on **April 2, 2025**, I served true and correct copies of **ILLINOIS EPA'S RESPONSE TO PETITIONER'S MOTION FOR SUMMARY JUDGMENT** via the Board's COOL system and email, upon the following named persons:

Don Brown, Clerk  
Illinois Pollution Control Board  
60 E. Van Buren Street  
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Chicago, IL 60605  
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