

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

IN THE MATTER OF:)	
)	
PETITION OF C.J.)	AS 2026-002
GOODALL TIRE CO., INC.)	(Adjusted Standard - Land)
FOR ADJUSTED STANDARDS)	
FROM 35 ILL. ADM. CODE PART 848)	

NOTICE OF FILING

To: Don Brown, Clerk
Illinois Pollution Control Board
100 West Randolph St.
Suite 11-500
Chicago, Illinois 60601

Melanie Jarvis
Deputy General Counsel
Division of Legal Counsel
Illinois Environmental Protection Agency
1021 North Grand Avenue East
P.O. Box 19267
Springfield, IL 62795-9276

Please take notice that on December 31, 2025, the Petitioner filed electronically with the Office of the Clerk of the Illinois Pollution Control Board, the attached Motion to Dismiss Petition of C.J. Goodall Tire Co., Inc. for Adjusted Standards from 35 Ill. Adm. Code, Part 848, copies of which are served upon you.

Dated: December 31, 2025

Respectfully submitted,
C.J. Goodall Tire Co., Inc.,
Petitioner.

By: /s/ John J. Kim
One of Its Attorneys

BROWN, HAY & STEPHENS, LLP
John J. Kim, #6203296
Claire D. Meyer, #6346059
205 S. Fifth Street, Suite 1000
P.O. Box 2459
Springfield, IL 62705-2459
(217) 544-8491

CERTIFICATE OF SERVICE

I, the undersigned attorney, certify that I have filed the documents described above electronically with the Illinois Pollution Control Board and served the Illinois Environmental Protection Agency with the same documents by First Class Mail, postage prepaid, on December 31, 2025.

Don Brown, Clerk

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100 West Randolph St.
Suite 11-500
Chicago, Illinois 60601

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Deputy General Counsel
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MOTION TO DISMISS
PETITION FOR ADJUSTED STANDARD

Petitioner, C.J. Goodall Tire Co., Inc., by and through its attorneys Brown, Hay & Stephens, LLP, hereby submits its Motion to Dismiss Petition for Adjusted Standard. In support of said Motion, Petitioner states as follows:

1. On December 22, 2025, Petitioner filed with the Illinois Pollution Control Board its Petition for Adjusted Standards from 35 Ill. Adm. Code, Part 848.

2. As of December 31, 2025, despite its best efforts, Petitioner was made aware that due to holiday schedules and the lack of daily newspapers of general circulation in the affected area, it will not be able to accomplish the publication of Notice of the Petition required pursuant to 35 Ill. Adm. Code 104.408 within 14 days of the filing of the Petition.

3. Accordingly, Petitioner expects that the Board will lack jurisdiction over the Petition filed on December 22, 2025.

4. Petitioner intends to refile its Petition for Adjusted Standard so that it may timely provide Notice pursuant to 35 Ill. Adm. Code 104.408 and does not wish to burden the Board with duplicative matters.

WHEREFORE, Petitioner, C.J. Goodall Tire Co., Inc., respectfully submits this Motion to Dismiss its Petition for Adjusted Standard.

Dated: December 31, 2025

Respectfully submitted,

**C.J. Goodall Tire Co., Inc.,
Petitioner.**

By: /s/ John J. Kim
One of Its Attorneys

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