

**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** **Melanie Jarvis**  
Illinois Pollution Control Board Deputy General Counsel  
100 West Randolph St. Division of Legal Counsel  
Suite 11-500 Illinois Environmental Protection Agency  
Chicago, Illinois 60601 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**  
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  
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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

**BROWN, HAY & STEPHENS, LLP**

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