

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

**RECEIVED**  
CLERK'S OFFICE

PEOPLE OF THE STATE OF ILLINOIS,

Petitioner,

v.

JERSEY SANITATION CORPORATION,

Respondent.

SEP 15 2003

STATE OF ILLINOIS  
*Pollution Control Board*  
PCB 97-2  
Enforcement

**NOTICE OF FILING AND PROOF OF SERVICE**

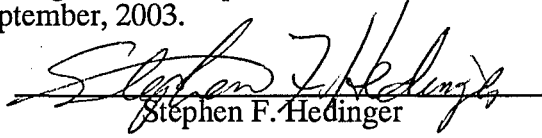
The undersigned certifies that an original and nine copies of Respondent's Witness List were served upon the Clerk of the Illinois Pollution Control Board, and one copy was served upon the following party of record and the Hearing Officer in this cause by enclosing same in envelopes addressed to:

Dorothy Gunn, Clerk  
Illinois Pollution Control Board  
James R. Thompson Center  
100 W. Randolph St., Suite 11-500  
Chicago, IL 60601

Carol Sudman, Hearing Officer  
Pollution Control Board  
600 South Second Street, Ste. 402  
Springfield, IL 62704

Jane McBride  
Attorney General's Office  
Environmental Bureau  
500 South Second Street  
Springfield, Illinois 62706

with postage fully prepaid, and by depositing said envelopes in a U.S. Post Office Mail Box in Springfield, Illinois on the ~~17th~~ day of September, 2003.

  
Stephen F. Hedinger

HEDINGER LAW OFFICE  
2601 South Fifth Street  
Springfield, IL 62703  
(217) 523-2753 phone  
(217) 523-4366 fax

*This Pleading is being submitted on recycled paper.*

**RECEIVED**

CLERK'S OFFICE

SEP 15 2003

**BEFORE THE ILLINOIS POLLUTION CONTROL BOARD**

PEOPLE OF THE STATE OF ILLINOIS,

Petitioner,

v.

JERSEY SANITATION CORPORATION,

Respondent.

STATE OF ILLINOIS  
*Pollution Control Board*

PCB 97-2  
Enforcement

**WITNESS LIST**

NOW COMES Respondent, JERSEY SANITATION CORPORATION, through its undersigned attorney, and hereby submits its witness list for the September 26, 2003 hearing.

1. Rich Johnson  
Assistant Regional Manager, Bureau of Land  
Illinois Environmental Protection Agency  
1021 North Grand Avenue East  
P.O. Box 19276  
Springfield, IL 62794-9276

Mr. Johnson will appear as an adverse witness and will testify regarding all matters concerning the Jersey Sanitation Landfill, including inspections, site history, permit background, all violations alleged by Complainant, and conversations with Respondent's employees and agents.

2. Pam Shourd, President  
Jersey Sanitation Corporation  
24257 Old Barn Ln  
Jerseyville, Illinois 62052

Ms. Shourd will testify regarding all matters concerning Jersey Sanitation Landfill, including inspections, site history, permit background, all violations alleged by Complainant, challenges to those alleged violations, conversations with Complainant's employees and agents including discussions of financial assurance, and facts and circumstances bearing upon the amount of any penalty to be issued in this case.

3. Tracey Kelsey  
Heneghen & Associates  
830 S. State St.  
P.O. Box 86  
Jerseyville, IL 62052-0086

Mr. Kelsey will testify concerning all matters relating to survey issues.

4. Andy Rathsack or designated agent of Andrews Environmental Engineering, Inc.  
3535 Mayflower St.  
Springfield, IL 62707

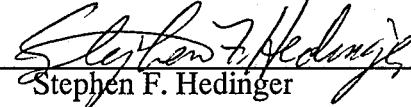
Mr. Rathsack or a designated agent of Andrews Environmental Engineering, Inc. will testify relating to the history and background of the Jersey Sanitation Landfill, the permitting history and background of the Jersey Sanitation Landfill, matters pertaining to surveys and boundary control, and the history and permitting requirements and industry standards during the relevant time frame of closure/post-closure of this landfill.

Respectfully submitted,

Jersey Sanitation Corporation,  
Respondent,

By its attorney,

HEDINGER LAW OFFICE

By   
Stephen F. Hedinger

Hedinger Law Office  
2601 S. Fifth St.  
Springfield, IL 62703  
(217) 523-2753 phone  
(217) 523-4366 fax