



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276, 217-782-3397

JAMES R. THOMPSON CENTER, 100 WEST RANDOLPH, SUITE 11-300, CHICAGO, IL 60601, 312-804-1802

ROD R. BLAGOJEVICH, GOVERNOR

RENEE CIPRIANO, DIRECTOR

RECEIVED
CLERK'S OFFICE

MAY 05 2004

STATE OF ILLINOIS
Pollution Control Board

(217) 782-9817
TDD: (217) 782-9143

AC04-75

May 3, 2004

The Honorable Dorothy Gunn, Clerk
Illinois Pollution Control Board
James R. Thompson Center
100 West Randolph Street, Suite 11-500
Chicago, Illinois 60601

Re: Illinois Environmental Protection Agency v. Charles L. Parker
IEPA File No. 221-04-AC; 1078055001—Logan County

Dear Clerk Gunn:

Enclosed for filing with the Illinois Pollution Control Board, please find the original and nine true and correct copies of the Administrative Citation Package, consisting of the Administrative Citation, the inspector's Affidavit, and the inspector's Illinois Environmental Protection Agency Open Dump Inspection Checklist, issued to the above-referenced respondent(s).

On this date, a copy of the Administrative Citation Package was given to an inspector from the Springfield Regional Office to be delivered to Respondent via hand delivery. As soon as I receive the affidavit of service, I will promptly file a copy with you, so that the Illinois Pollution Control Board may calculate the thirty-five (35) day appeal period for purposes of entering a default judgment in the event the Respondent(s) fails or elects not to file a petition for review contesting the Administrative Citation.

If you have any questions or concerns, please do not hesitate to contact me at the number above. Thank you for your cooperation.

Sincerely,

Michelle M. Ryan
Assistant Counsel

Enclosures

RECEIVED
CLERK'S OFFICE

MAY 05 2004

STATE OF ILLINOIS
Pollution Control Board

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

ILLINOIS ENVIRONMENTAL
PROTECTION AGENCY,

Complainant,

v.

CHARLES L. PARKER,

Respondent.

AC

04-75

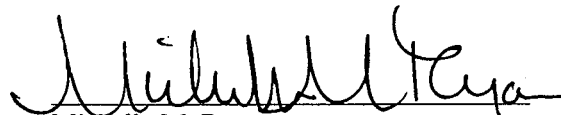
(IEPA No. 221-04-AC)

NOTICE OF FILING

To: Charles L. Parker
217 ½ S. Sangamon
Lincoln, Illinois 62656

PLEASE TAKE NOTICE that on this date I mailed for filing with the Clerk of the Pollution Control Board of the State of Illinois the following instrument(s) entitled ADMINISTRATION CITATION, AFFIDAVIT, and OPEN DUMP INSPECTION CHECKLIST.

Respectfully submitted,



Michelle M. Ryan
Special Assistant Attorney General

Illinois Environmental Protection Agency
1021 North Grand Avenue East
P.O. Box 19276
Springfield, Illinois 62794-9276
(217) 782-5544

Dated: May 3, 2004

INFORMATIONAL NOTICE !!!

IT IS IMPORTANT THAT YOU READ THE ENCLOSED DOCUMENTS.

NOTE: This Administrative Citation refers to TWO separate State of Illinois Agencies. One is the **ILLINOIS POLLUTION CONTROL BOARD** located at State of Illinois Center, 100 West Randolph Street, Suite 11-500, Chicago, Illinois 60601. The other state agency is the **ILLINOIS ENVIRONMENTAL PROTECTION AGENCY** located at: 1021 North Grand Avenue East, P.O. Box 19276, Springfield, Illinois 61794-9276.

If you elect to contest the enclosed Administrative citation, you must file a **PETITION FOR REVIEW** with **thirty-five (35) days** of the date the Administrative Citation was served upon you. Any such Petition for Review must be filed with the clerk of the Illinois Pollution Control Board by either hand delivering or mailing to the Board at the address given above. A copy of the Petition for Review should be either hand-delivered or mailed to the Illinois Environmental Protection Agency at the address given above and should be marked to the **ATTENTION: DIVISION OF LEGAL COUNSEL.**

ADMINISTRATIVE CITATION

(IEPA No. 221-04-AC)

2. That said facility is an open dump operating without an Illinois Environmental Protection Agency Operating Permit and is designated with Site Code No. 1078055001.
3. That Respondent has owned said facility at all times pertinent hereto.

4. That on March 25, 2004, William Zierath of the Illinois Environmental Protection Agency's Springfield Regional Office inspected the above-described facility. A copy of his inspection report setting forth the results of said inspection is attached hereto and made a part hereof.

VIOLATIONS

Based upon direct observations made by William Zierath during the course of his March 25, 2004 inspection of the above-named facility, the Illinois Environmental Protection Agency has determined that Respondent has violated the Illinois Environmental Protection Act (hereinafter, the "Act") as follows:

- (1) That Respondent caused or allowed the open dumping of waste in a manner resulting in litter, a violation of Section 21(p)(1) of the Act, 415 ILCS 5/21(p)(1) (2002).
- (2) That Respondent caused or allowed the open dumping of waste in a manner resulting in open burning, a violation of Section 21(p)(3) of the Act, 415 ILCS 5/21(p)(3) (2002).
- (3) That Respondent caused or allowed the open dumping of waste in a manner resulting in deposition of general construction or demolition debris or clean construction or demolition debris, a violation of Section 21(p)(7) of the Act, 415 ILCS 5/21(p)(7) (2002).

CIVIL PENALTY

Pursuant to Section 42(b)(4-5) of the Act, 415 ILCS 5/42(b)(4-5) (2002), Respondent is subject to a civil penalty of One Thousand Five Hundred Dollars (\$1,500.00) for each of the violations identified above, for a total of Four Thousand five Hundred Dollars (\$4,500.00). If Respondent elects not to petition the Illinois Pollution Control Board, the statutory civil penalty specified above shall be due and payable no later than June 15, 2004, unless otherwise provided by

order of the Illinois Pollution Control Board.

If Respondent elects to contest this Administrative Citation by petitioning the Illinois Pollution Control Board in accordance with Section 31.1 of the Act, 415 ILCS 5/31.1 (2002), and if the Illinois Pollution Control Board issues a finding of violation as alleged herein, after an adjudicatory hearing, Respondent shall be assessed the associated hearing costs incurred by the Illinois Environmental Protection Agency and the Illinois Pollution Control Board. Those hearing costs shall be assessed in addition to the One Thousand Five Hundred Dollar (\$1,500.00) statutory civil penalty for each violation.

Pursuant to Section 31.1(d)(1) of the Act, 415 ILCS 5/31.1(d)(1) (2002), if Respondent fails to petition or elects not to petition the Illinois Pollution Control Board for review of this Administrative Citation within thirty-five (35) days of the date of service, the Illinois Pollution Control Board shall adopt a final order, which shall include this Administrative Citation and findings of violation as alleged herein, and shall impose the statutory civil penalty specified above.

When payment is made, Respondent's check shall be made payable to the Illinois Environmental Protection Trust Fund and mailed to the attention of Fiscal Services, Illinois Environmental Protection Agency, 1021 North Grand Avenue East, P.O. Box 19276, Springfield, Illinois 62794-9276. Along with payment, Respondent shall complete and return the enclosed Remittance Form to ensure proper documentation of payment.

If any civil penalty and/or hearing costs are not paid within the time prescribed by order of the Illinois Pollution Control Board, interest on said penalty and/or hearing costs shall be assessed against the Respondent from the date payment is due up to and including the date that payment is received. The Office of the Illinois Attorney General may be requested to initiate proceedings against Respondent in Circuit Court to collect said penalty and/or hearing costs, plus any interest accrued.

PROCEDURE FOR CONTESTING THIS
ADMINISTRATIVE CITATION

Respondent has the right to contest this Administrative Citation pursuant to and in accordance with Section 31.1 of the Act, 415 ILCS 5/31/1 (2002). If Respondent elects to contest this Administrative Citation, then Respondent shall file a signed Petition for Review, including a Notice of Filing, Certificate of Service, and Notice of Appearance, with the Clerk of the Illinois Pollution Control Board, State of Illinois Center, 100 West Randolph, Suite 11-500, Chicago, Illinois 60601. A copy of said Petition for Review shall be filed with the Illinois Environmental Protection Agency's Division of Legal Counsel at 1021 North Grand Avenue East, P.O. Box 19276, Springfield, Illinois 62794-9276. Section 31.1 of the Act provides that any Petition for Review shall be filed within thirty-five (35) days of the date of service of this Administrative Citation or the Illinois Pollution Control Board shall enter a default judgment against the Respondent.

Renee Cipriano
Renee Cipriano, Director *by wcc*
Illinois Environmental Protection Agency

Date: 5/3/04

Prepared by: Susan E. Konzelmann, Legal Assistant
Division of Legal Counsel
Illinois Environmental Protection Agency
1021 North Grand Avenue East
P.O. Box 19276
Springfield, Illinois 62794-9276
(217) 782-5544

REMITTANCE FORM

ILLINOIS ENVIRONMENTAL
PROTECTION AGENCY,

Complainant,

v.

CHARLES L. PARKER,

Respondent.

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AC

(IEPA No 221-04-AC)

FACILITY: Lincoln/Parker

SITE CODE NO.: 1078055001

COUNTY: Logan

CIVIL PENALTY: \$4,500.00

DATE OF INSPECTION: March 25, 2004

DATE REMITTED:

SS/FEIN NUMBER:

SIGNATURE:

NOTE

Please enter the date of your remittance, your Social Security number (SS) if an individual or Federal Employer Identification Number (FEIN) if a corporation, and sign this Remittance Form. Be sure your check is enclosed and mail, along with Remittance Form, to Illinois Environmental Protection Agency, Attn.: Fiscal Services, P.O. Box 19276, Springfield, Illinois 62794-9276.

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

AFFIDAVIT

IN THE MATTER OF:

Respondent.

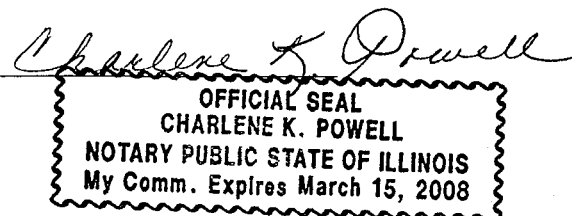
IEPA DOCKET NO.

Affiant, William E. Zierath, being first duly sworn, voluntarily deposes and states as follow:

1. Affiant is a field inspector employed by the Land Pollution Control Division of the Environmental Protection Agency and has been so employed at all times pertinent hereto.
2. On March 25, 2004, between 10:45 AM and 11:15 AM, Affiant conducted an inspection of a disposal site operated without an Agency permit, located in Logan County, Illinois and known as Parker 1 by the Illinois Environmental Protection Agency. Said site has been assigned site code number LPC# 1078055001 by the Agency.
3. Affiant inspected said Parker 1 open dump site by an on-site inspection which included walking and photographing the site.
4. As a result of the activities referred to in paragraph 3 above, Affiant completed the Inspection Report form attached hereto and made a part hereof, which, to the best of Affiant's knowledge and belief, is an accurate representation of Affiant's observations and factual conclusions with respect to said Parker 1 open dump.

W. E. Zierath

Subscribed and Sworn To before me
This 1st day of April, 2004



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

Open Dump Inspection Checklist

County: Logan LPC#: 1078055001 Region: 5 - Springfield

Location/Site Name: Lincoln/Parker

Date: 03/25/04 Time: From 10:45 To 11:15 Previous Inspection Date: 11/10/03

Inspector(s): William Zierath Weather: Cloudy, Raining, 60F

No. of Photos Taken: # 16 Est. Amt. of Waste: >100 yds³ Samples Taken: Yes # No ☒

Interviewed: No one Complaint #: C-98-103-C

Responsible Party
Mailing Address(es)
and Phone
Number(s):

Charles L. Parker
217½ S. Sangamon
Lincoln, Illinois 62656

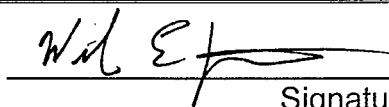
RECEIVED
APR 16 2004
IEPA-DLPC

	SECTION	DESCRIPTION	VIOL
ILLINOIS ENVIRONMENTAL PROTECTION ACT REQUIREMENTS			
1.	9(a)	CAUSE, THREATEN OR ALLOW AIR POLLUTION IN ILLINOIS	<input checked="" type="checkbox"/>
2.	9(c)	CAUSE OR ALLOW OPEN BURNING	<input checked="" type="checkbox"/>
3.	12(a)	CAUSE, THREATEN OR ALLOW WATER POLLUTION IN ILLINOIS	<input type="checkbox"/>
4.	12(d)	CREATE A WATER POLLUTION HAZARD	<input type="checkbox"/>
5.	21(a)	CAUSE OR ALLOW OPEN DUMPING	<input checked="" type="checkbox"/>
6.	21(d)	CONDUCT ANY WASTE-STORAGE, WASTE-TREATMENT, OR WASTE- DISPOSAL OPERATION:	
	(1)	Without a Permit	<input checked="" type="checkbox"/>
	(2)	In Violation of Any Regulations or Standards Adopted by the Board	<input checked="" type="checkbox"/>
7.	21(e)	DISPOSE, TREAT, STORE, OR ABANDON ANY WASTE, OR TRANSPORT ANY WASTE INTO THE STATE AT/TO SITES NOT MEETING REQUIREMENTS OF ACT AND REGULATIONS	<input checked="" type="checkbox"/>
8.	21(p)	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	<input checked="" type="checkbox"/>
	(2)	Scavenging	<input type="checkbox"/>
	(3)	Open Burning	<input checked="" type="checkbox"/>
	(4)	Deposition of Waste in Standing or Flowing Waters	<input type="checkbox"/>
	(5)	Proliferation of Disease Vectors	<input type="checkbox"/>
	(6)	Standing or Flowing Liquid Discharge from the Dump Site	<input type="checkbox"/>

LPC #

Inspection Date:

	(7)	Deposition of General Construction or Demolition Debris; or Clean Construction or Demolition Debris	<input checked="" type="checkbox"/>
9.	55(a)	NO PERSON SHALL:	
	(1)	Cause or Allow Open Dumping of Any Used or Waste Tire	<input checked="" type="checkbox"/>
	(2)	Cause or Allow Open Burning of Any Used or Waste Tire	<input type="checkbox"/>
35 ILLINOIS ADMINISTRATIVE CODE REQUIREMENTS SUBTITLE G			
10.	812.101(a)	FAILURE TO SUBMIT AN APPLICATION FOR A PERMIT TO DEVELOP AND OPERATE A LANDFILL	<input checked="" type="checkbox"/>
11.	722.111	HAZARDOUS WASTE DETERMINATION	<input type="checkbox"/>
12.	808.121	SPECIAL WASTE DETERMINATION	<input checked="" type="checkbox"/>
13.	809.302(a)	ACCEPTANCE OF SPECIAL WASTE FROM A WASTE TRANSPORTER WITHOUT A WASTE HAULING PERMIT, UNIFORM WASTE PROGRAM REGISTRATION AND PERMIT AND/OR MANIFEST	<input type="checkbox"/>
OTHER REQUIREMENTS			
14.		APPARENT VIOLATION OF: (<input type="checkbox"/>) PCB; (<input type="checkbox"/>) CIRCUIT COURT CASE NUMBER: ORDER ENTERED ON:	<input type="checkbox"/>
15.	OTHER:		<input type="checkbox"/>
			<input type="checkbox"/>
			<input type="checkbox"/>
			<input type="checkbox"/>
			<input type="checkbox"/>
			<input type="checkbox"/>



Signature of Inspector(s)

Informational Notes

1. [Illinois] Environmental Protection Act: 415 ILCS 5/4.
2. Illinois Pollution Control Board: 35 Ill. Adm. Code, Subtitle G.
3. Statutory and regulatory references herein are provided for convenience only and should not be construed as legal conclusions of the Agency or as limiting the Agency's statutory or regulatory powers. Requirements of some statutes and regulations cited are in summary format. Full text of requirements can be found in references listed in 1. and 2. above.
4. The provisions of subsection (p) of Section 21 of the [Illinois] Environmental Protection Act shall be enforceable either by administrative citation under Section 31.1 of the Act or by complaint under Section 31 of the Act.
5. This inspection was conducted in accordance with Sections 4(c) and 4(d) of the [Illinois] Environmental Protection Act: 415 ILCS 5/4(c) and (d).
6. Items marked with an "NE" were not evaluated at the time of this inspection.



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276, 217-782-3397
JAMES R. THOMPSON CENTER, 100 WEST RANDOLPH, SUITE 11-300, CHICAGO, IL 60601, 312-814-6026

ROD R. BLAGOJEVICH, GOVERNOR

RENEE CIPRIANO, DIRECTOR

MEMORANDUM

Date: March 25, 2004

To: BOL File

From: William E. Zierath, BOL/FOS - Springfield Region

Subject: LPC# 1078055001 – Logan County
Lincoln/Parker
Complaint C-98-103-C
FOS File

A complaint follow-up investigation was conducted at this site on March 25, 2004. No one else was at the site during this investigation. The weather was cloudy, raining and 60°F.

An inspection was conducted at this site on November 10, 2003. An Administrative Citation Warning Notice was sent to Charles Parker, the owner of this property, in January 2004. The ACWN specified that wastes must be removed from the site by March 15, 2004. The ACWN specified that a written response specifying proposed corrective actions was to have been submitted within 15 days of receipt of the ACWN. To date the Agency has not received a response from Mr. Parker. The purpose of this inspection was to determine if the wastes previously observed at this site had been removed.

During the November 10, 2003 inspection it was observed that there were several large piles of landscape waste at the site. The landscape waste observed in November had been burned prior to this inspection. Some of the wood was still burning at the time of the inspection. There was a small endloader/backhoe located near the burn area. There were tire tracks and scrape marks near the burn area that indicated the endloader had been used to move some of the landscape waste to the burn location. The burn pile is shown in photographs 1078055001~03252004-002, 1078055001~03252004-006, 1078055001~03252004-007, 1078055001~03252004-008, 1078055001~03252004-010, and 1078055001~03252004-011. The endloader/backhoe is shown in photograph 1078055001~03252004-010. Tracks from the use of the endloader/backhoe are shown in photographs 1078055001~03252004-008, 1078055001~03252004-010 and 1078055001~03252004-012. I looked on-site for the stumps from trees that might indicate that the landscape waste being burned had been generated on this property. I could not find any such stumps or any areas where the soil had been disturbed as though stumps had been removed.

There were several items besides landscape wastes visible in the burn pile. There were several pieces of metal (including mattress springs) and a few pieces of demolition waste. The metal is shown in photographs 1078055001~03252004-006 and 1078055001~03252004-007. Demolition waste is shown in photograph 1078055001~03252004-011.

Wastes observed during the November 10, were still present during this inspection. Wastes observed included demolition waste, abandoned vehicles, white goods, 55-gallon drums, and air conditioners. Demolition waste is shown in photographs 1078055001~03252004-001, 1078055001~03252004-002, 1078055001~03252004-003, 1078055001~03252004-005, 1078055001~03252004-008, 1078055001~03252004-009, 1078055001~03252004-010, 1078055001~03252004-012, 1078055001~03252004-014, and 1078055001~03252004-016. Abandoned vehicles are shown in photographs 1078055001~03252004-001, 1078055001~03252004-002, 1078055001~03252004-004, 1078055001~03252004-005, 1078055001~03252004-006, 1078055001~03252004-009, 1078055001~03252004-010, and 1078055001~03252004-013. White goods are shown in photographs 1078055001~03252004-005 and 1078055001~03252004-010. Used air conditioners are shown in photograph 1078055001~03252004-014.

There were a sofa, a chair and some old carpeting that had been dumped south of the burn pile. These waste items are shown in photograph 1078055001~03252004-009.

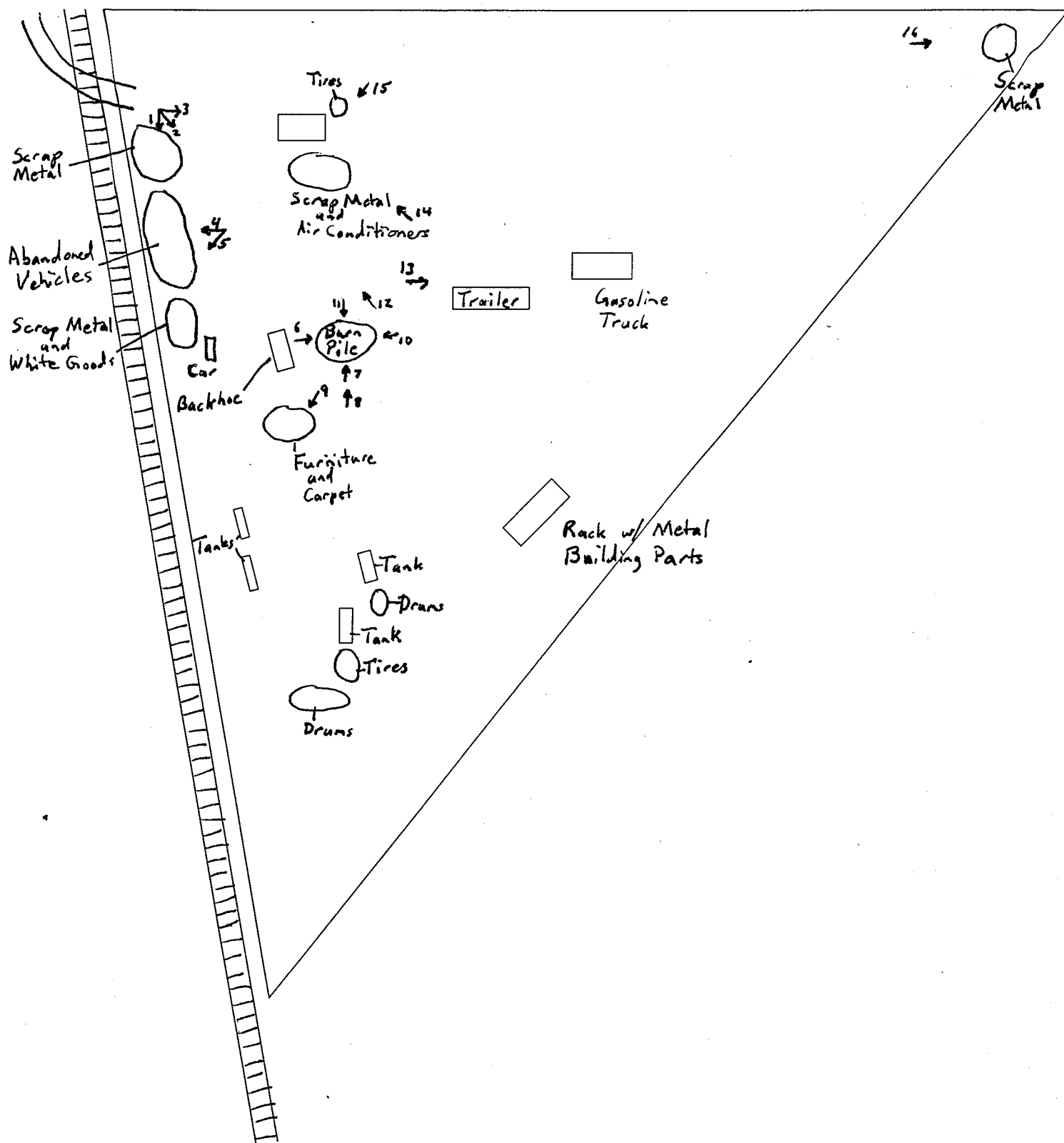
There were 16 used tires stacked near a storage building. At least two of the tires were still on rims. Several other tires were observed to be off rims. There was water accumulated in the off-rim tires. The tires are shown in photograph 1078055001~03252004-015.

Apparent violations are marked on the attached checklist.

cc: BOL/FOS – Springfield Regional File

Not to Scale

↗ = Direction of Photograph





Illinois Environmental Protection Agency
Bureau of Land

DIGITAL PHOTOGRAPHS

LPC # 1078055001 — Logan County
Lincoln/Parker
FOS File

Date: March 25, 2004

Time: 10:51 AM

Direction: South

Photo by: William Zierath

Photo File Name:

1078055001~03252004-001

Comments:



Date: March 25, 2004

Time: 10:52 AM

Direction: Southeast

Photo by: William Zierath

Photo File Name:

1078055001~03252004-002

Comments:





Illinois Environmental Protection Agency
Bureau of Land

DIGITAL PHOTOGRAPHS

LPC # 1078055001 — Logan County
Lincoln/Parker
FOS File

Date: March 25, 2004
Time: 10:52 AM
Direction: East
Photo by: William Zierath
Photo File Name:
1078055001~03252004-003
Comments:



Date: March 25, 2004
Time: 10:52 AM
Direction: West
Photo by: William Zierath
Photo File Name:
1078055001~03252004-004
Comments:





Illinois Environmental Protection Agency
Bureau of Land

DIGITAL PHOTOGRAPHS

LPC # 1078055001 — Logan County
Lincoln/Parker
FOS File

Date: March 25, 2004
Time: 10:52 AM
Direction: Southwest
Photo by: William Zierath
Photo File Name:
1078055001~03252004-005
Comments:



Date: March 25, 2004
Time: 10:53 AM
Direction: East
Photo by: William Zierath
Photo File Name:
1078055001~03252004-006
Comments:



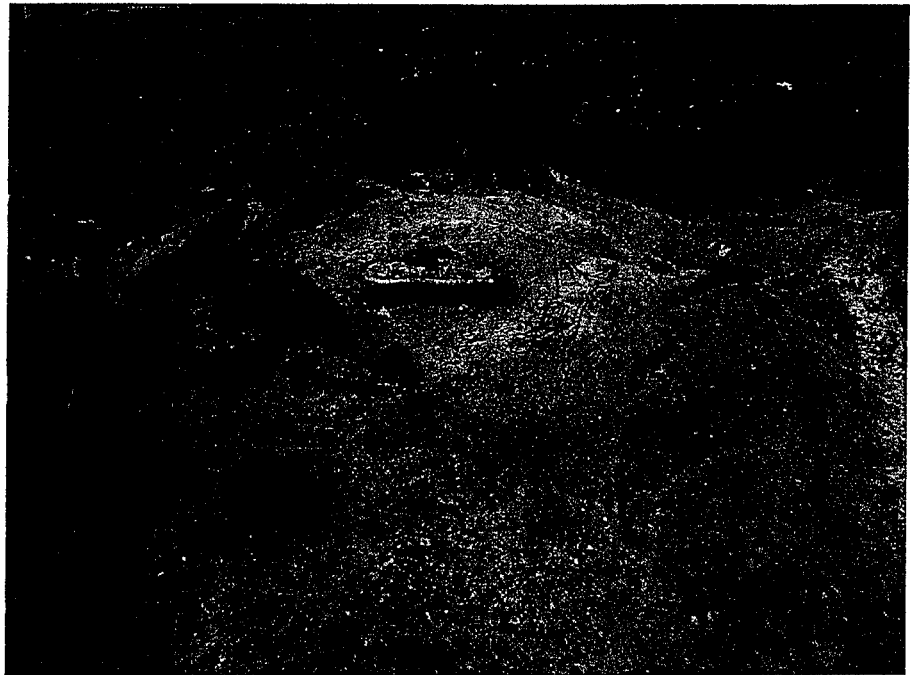


Illinois Environmental Protection Agency
Bureau of Land

DIGITAL PHOTOGRAPHS

LPC # 1078055001 — Logan County
Lincoln/Parker
FOS File

Date: March 25, 2004
Time: 10:53 AM
Direction: North
Photo by: William Zierath
Photo File Name:
1078055001~03252004-007
Comments:



Date: March 25, 2004
Time: 10:53 AM
Direction: North
Photo by: William Zierath
Photo File Name:
1078055001~03252004-008
Comments:





Illinois Environmental Protection Agency
Bureau of Land

DIGITAL PHOTOGRAPHS

LPC # 1078055001 — Logan County
Lincoln/Parker
FOS File

Date: March 25, 2004
Time: 10:53 AM
Direction: Southwest
Photo by: William Zierath
Photo File Name:
1078055001~03252004-009
Comments:



Date: March 25, 2004
Time: 10:54 AM
Direction: West
Photo by: William Zierath
Photo File Name:
1078055001~03252004-010
Comments:



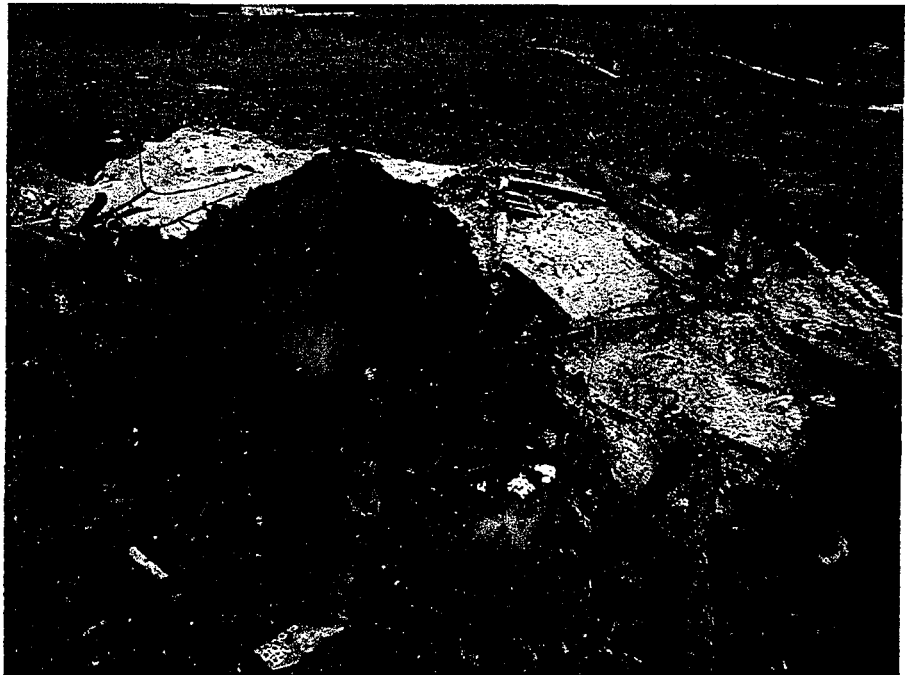


Illinois Environmental Protection Agency
Bureau of Land

DIGITAL PHOTOGRAPHS

LPC # 1078055001 — Logan County
Lincoln/Parker
FOS File

Date: March 25, 2004
Time: 10:54 AM
Direction: South
Photo by: William Zierath
Photo File Name:
1078055001~03252004-011
Comments:



Date: March 25, 2004
Time: 10:55 AM
Direction: Northwest
Photo by: William Zierath
Photo File Name:
1078055001~03252004-012
Comments:





Illinois Environmental Protection Agency
Bureau of Land

DIGITAL PHOTOGRAPHS

LPC # 1078055001 — Logan County
Lincoln/Parker
FOS File

Date: March 25, 2004
Time: 10:55 AM
Direction: East
Photo by: William Zierath
Photo File Name:
1078055001~03252004-013
Comments:



Date: March 25, 2004
Time: 10:55 AM
Direction: Northwest
Photo by: William Zierath
Photo File Name:
1078055001~03252004-014
Comments:





Illinois Environmental Protection Agency
Bureau of Land

DIGITAL PHOTOGRAPHS

LPC # 1078055001 — Logan County
Lincoln/Parker
FOS File

Date: March 25, 2004
Time: 10:56 AM
Direction: Southwest
Photo by: William Zierath
Photo File Name:
1078055001~03252004-015
Comments:



Date: March 25, 2004
Time: 10:57 AM
Direction: East
Photo by: William Zierath
Photo File Name:
1078055001~03252004-016
Comments:



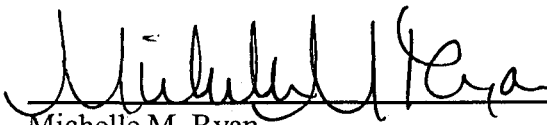
PROOF OF SERVICE

I hereby certify that I did on the 3rd day of May, 2004 send by messenger mail to the Springfield Regional Office of the Illinois EPA, a true and correct copy of the following instrument(s) entitled ADMINISTRATIVE CITATION, AFFIDAVIT, and OPEN DUMP INSPECTION CHECKLIST for hand delivery

To: Charles L. Parker
217 ½ S. Sangamon
Lincoln, Illinois 62656

and the original and nine (9) true and correct copies of the same foregoing instruments on the same date by Certified Mail with postage thereon fully prepaid

To: Dorothy Gunn, Clerk
Pollution Control Board
James R. Thompson Center
100 West Randolph Street, Suite 11-500
Chicago, Illinois 60601


Michelle M. Ryan
Special Assistant Attorney General

Illinois Environmental Protection Agency
1021 North Grand Avenue East
P.O. Box 19276
Springfield, Illinois 62794-9276
(217) 782-5544