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BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

SEP 22 2004

STATE OF ILLINOIS  
Pollution Control Board

ILLINOIS ENVIRONMENTAL )  
PROTECTION AGENCY, )  
 )  
Complainant, )  
 )  
v. )  
 )  
C. JOHN BLICKHAN, )  
 )  
Respondent. )

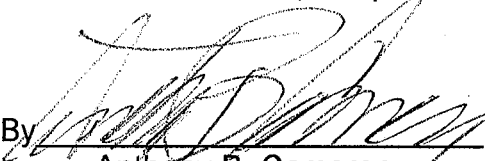
AC 05-15  
(IEPA No. 361-04-AC)

**NOTICE OF FILING**

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 instruments entitled **Petition for Review, Notice of Appearance and Certificate of Service.**

Dated: September 20, 2004

C. JOHN BLICKHAN, Respondent,

By   
Anthony B. Cameron,  
His Attorney

ANTHONY B. CAMERON - 374555  
Attorney for Respondent  
529 Hampshire Street - Suite 511  
Quincy, IL 62301  
Telephone: (217) 228-8669  
Telefax: (217) 228-2225  
Our File No. 04-901

Presented on recycled bond  
as encouraged by Rule 10.

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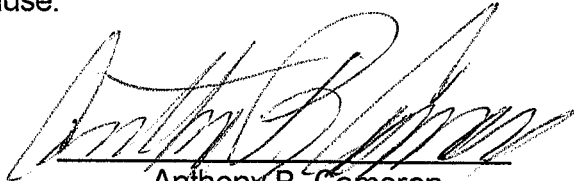
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(IEPA No. 361-04-AC)

**NOTICE OF APPEARANCE**

NOW COMES Anthony B. Cameron, Attorney at Law, and enters his appearance as counsel for Respondent, herein praying this Board and counsel for other parties that notice be given at the address set forth below of any further proceedings or filings in the instant cause.

  
\_\_\_\_\_  
Anthony B. Cameron

ANTHONY B. CAMERON - 374555  
Attorney for Respondent  
529 Hampshire Street - Suite 511  
Quincy, IL 62301  
Telephone: (217) 228-8669  
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**PETITION FOR REVIEW**

Now comes Respondent, C. John Blickhan, by his attorney, Anthony B. Cameron, and for his Petition for Review, states as follows:

**(PUTATIVE) FACTS**

1. Respondent admits he is the currently designated operator of a facility, enclosure, located at Lock & Dam Road, Quincy, Adams County, Illinois. Respondent further admits that the property is known in IEPA parlance as the "Quincy Blickhan landfill." In further answer, however, Respondent, C. John Blickhan, asserts that neither the landfill nor any property owned by him is the subject of the entire incident report and/or violations complained of in the Administrative Citation;

2. Respondent denies each and every allegation of Paragraph 2 of said Administrative Citation;

3. Respondent denies that he has owned or operated all of the property complained of in the said Administrative Citation;

4. Respondent admits that one Michelle E. Cozadd claims to have made an inspection on some property she describes as set forth in Paragraphs 1, 2, and 3 of the Administrative Citation and denies each and every other allegation of said Paragraph 4 of said Administrative Citation.

(PUTATIVE) VIOLATION

Respondent denies each and every allegation set forth in the lead paragraph, subparagraphs (1) and (2) of the instant Administrative Citation and, in further answer, states there was no unlawful open dumping on property owned or operated by him and certain other property complained of is not his property and not his responsibility.

CLAIMED CIVIL PENALTY

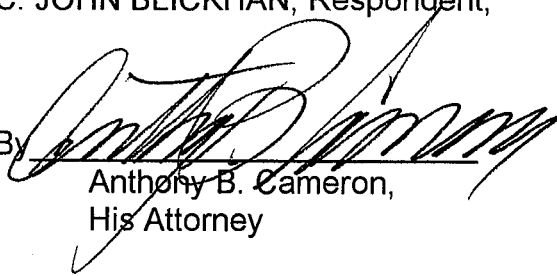
Respondent admits he has been advised of the contents of this subsection of said Administrative Citation, denies each and every other allegation of said subsections of said Administrative Citation and denies the balance of the language set forth therein as moot.

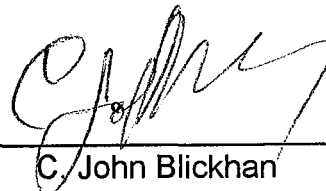
PROCEDURE FOR CONTESTING THIS ADMINISTRATIVE CITATION

Respondent now replies within the time set forth in this section, denies each and every remaining allegation thereof and demands strict proof of any and all matters asserted in said Administrative Citation.

C. JOHN BLICKHAN, Respondent,

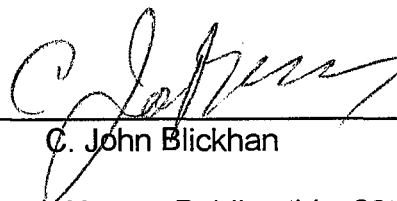
By

  
Anthony B. Cameron,  
His Attorney

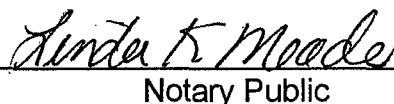
  
C. John Blickhan

STATE OF ILLINOIS     )  
                                  )  
                                  )     ss:  
COUNTY OF ADAMS     )

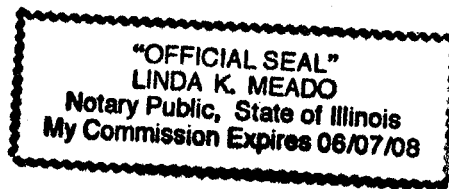
C. John Blickhan, having been first duly sworn upon his oath, deposes and says that he has read the foregoing and has knowledge of the content thereof, and that the same is true in substance and in fact to the best of his information, knowledge and belief.

  
C. John Blickhan

Subscribed and sworn to before me, a Notary Public, this 20th day of September, 2004.

  
Notary Public

ANTHONY B. CAMERON - 374555  
Attorney for Respondent  
529 Hampshire Street - Suite 511  
Quincy, IL 62301  
Telephone: (217) 228-8669  
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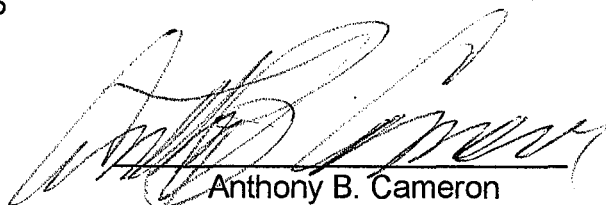
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CERTIFICATE OF SERVICE

I, Anthony B. Cameron, hereby certify that I served a copy of the foregoing document entitled **Notice of Appearance, Notice of Filing, Petition for Review and Certificate of Service** upon the following by depositing a true and correct copy of the same in a United States Post Office box located in Quincy, Illinois, first class postage fully prepaid, enclosed in an envelope plainly addressed as follows, on the 20th day of September, 2004:

Illinois Environmental Protection Agency  
ATTN: Division of Legal Counsel  
1021 North Grand Avenue East  
P. O. Box 19276  
Springfield, IL 61794-9276



Anthony B. Cameron

ANTHONY B. CAMERON - 374555  
Attorney for Respondent  
529 Hampshire Street - Suite 511  
Quincy, IL 62301  
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