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BEFORE THE ILLINOIS POLLUTION CONTROL BOARD JUL 07 2005

PEOPLE OF THE STATE OF ILLINOIS,)
Ex rel. LISA MADIGAN, Attorney General)
of the State of Illinois,)

STATE OF ILLINOIS
Pollution Control Board

Complainant,)

v.)

PCB 05-180
(Enforcement-Air)

ACI ENVIRONMENTAL)
CORPORATION, and Illinois corporation,)
and ASBESTOS CONTROL, INC., an)
Illinois corporation,)

Respondents.)

APPEARANCE

I hereby file my appearance in this proceeding, on Behalf of ACI Environmental
and Asbestos Control, Inc.


Peter G. Swan

Peter G. Swan
EMALFARB, SWAN & BAIN
440 Central Ave.
Highland Park, IL 60035
(847) 432-6900

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Ex rel. LISA MADIGAN, Attorney General)
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ACI ENVIRONMENTAL)
CORPORATION, and Illinois corporation,)
and ASBESTOS CONTROL, INC., an)
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Respondents.)

PCB 05-180
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NOTICE OF FILING


To: Christopher P. Perzan
Assistant Attorney General
Environmental Bureau
188 W. Randolph St., 20th Floor
Chicago, IL 60601
312-814-3532

On May 13, 2005, I caused to be filed with the Illinois Pollution Control Board, **Answer to Complaint**, a copy of which is attached hereto and hereby served upon you.

Peter G. Swan
EMALFARB, SWAN & BAIN
440 Central Avenue
Highland Park, IL 60035
(847) 432-6900
Attorney # 12082

CERTIFICATE OF SERVICE

I, Peter G. Swan, certify I served this notice by mailing a copy to the above party at the above address and depositing the same in the U.S. Mail at the Central Ave. Post Office, at 5:30 P.M. on May 12, 2005, with proper postage prepaid.


Peter G. Swan

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PEOPLE OF THE STATE OF ILLINOIS,)
Ex rel. LISA MADIGAN, Attorney General)
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Complainant,)
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ANSWER TO COMPLAINT

NOW COME the Respondents, ACI ENVIRONMENTAL CORPORATION, and Illinois corporation and ASBESTOS CONTROL, INC., and Illinois corporation, by and through their attorneys, Emalfarb, Swan & Bain, and for its answer to the complaint filed by the Petitioner, state as follows:

COUNT I

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted.
7. Admitted.
8. Denied.
9. Denied.
10. Admitted as to composition.
11. Admitted as to composition.
12. Denied as to any improper management of the asbestos containing material.
13. Admitted.

14. Admitted.
15. Admitted.
16. Admitted.
17. Admitted.
18. Admitted.
19. Admitted.
20. Admitted.
21. Admitted.
22. Denied.

WHEREFORE, for the foregoing reasons, the Respondent prays that this Board deny the relief as sought by the Petitioner in this action.

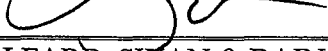
COUNT II

1.- 12. The Respondent realleges its responses to paragraphs 1-12 of Count I as its Responses to paragraphs 1-12 of Count II as if the same were fully saidforth herein.

13. Admitted.
14. Admitted.
15. Admitted.
16. Admitted.
17. Admitted.
18. Admitted.
19. Admitted.
20. Admitted.
21. Admitted.
22. Denied.
23. Denied.
24. Denied.
25. Admitted.

WHEREFORE, for the foregoing reasons, the Respondent, ACI ENVIRONMANTAL, prays that the complaint of the Petitioner be dismissed.

Respectfully Submitted,
ACI Environmental and Asbestos Control, Inc.

BY: 

EMALFARB, SWAN & BAIN
Their attorneys

Peter G. Swan
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440 Central Ave.
Highland Park, IL 60035
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