#### BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

RECEIVED CLERK'S OFFICE
----------------------------

APR 0 6 2006

STATE OF ILLINOIS Pollution Control Board

COUNTY OF JACKSON,

Complainant,

v.

AC 06 - 3

#### **NOTICE OF FILING**

TO: James Qualls, 2642 Wilson Road, Ava, Illinois 62907

PLEASE TAKE NOTICE that I have filed with the Office of the Clerk of the Illinois
Pollution Control Board the Complaint for Administrative Citation, a copy of which is herewith served upon you.

**Daniel Brenner** 

Assistant State's Attorney

March 21, 2006

Daniel Brenner Assistant State's Attorney Jackson County Courthouse Murphysboro, IL 62966 618-687-7200

THIS FILING IS SUBMITTED ON RECYCLED PAPER

#### BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

RECEIVED CLERK'S OFFICE

APR 0 6 2006

COUNTY OF JACKSON,	)	STATE OF ILLINOIS Pollution Control Board
Complainant,	)	
v.	) AC 06 - 31	
JAMES QUALLS,	) )	
Respondent.	, )	

#### **APPEARANCE**

I hereby file my appearance in this proceeding, on behalf of the County of Jackson.

Daniel Brenner

Assistant State's Attorney

Jackson County Courthouse, 3rd Floor

Murphysboro, IL 62966

618-687-7200

#### BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

COUNTY OF JACKSON,	RECEIVED CLERK'S OFFICE
Complainant, )	ORIGINAL APR 0 6 2006
v. )	ORIGINAL APR 0 6 2006  STATE OF ILLINOIS Pollution Control Board
JAMES QUALLS,	
Respondent. )	
Serve on: James Qualls, 20	642 Wilson Road, Ava, Illinois 62907
<u>P</u> F	ROOF OF SERVICE
I, the undersigned, hereby ce	ertify that a true and correct copy of the Administrative
Citation and Appearance were hand	d delivered to:
Name: James Qua	LLS
Address: 2642 Wilson F	ed Aut
Sex: Male_\( \square \) Female	
Age: $\frac{12}{17} \frac{3}{3}$	
Date of service: $03/30$	2006.
Time: 09:05 .m.	
SeeDers	
/S/ Robert Burns, Jackson Co. She By his Deputy	ij)f
PLEASE RETURN TO:	

DANIEL BRENNER
JACKSON COUNTY STATE'S ATTORNEY'S OFFICE

RECEIVED CLERK'S OFFICE

## BEFORE THE ILLINOIS POLLUTION CONTROL BOARD ADMINISTRATIVE CITATION

APR 0 6 2006

COUNTY OF JACKSON,	STATE OF ILLINOIS Pollution Control Board
Complainant,	
<b>v</b> .	) AC 06 - <b>3 1</b> ) Site Code: 0778005006
JAMES QUALLS,	
Respondent.	<b>,</b>

#### **JURISDICTION**

This Administrative Citation is issued pursuant to authority vested in the Illinois Environmental Protection Agency by 415 ILCS 5/1 *et. seq.* (2004), specifically 415 ILCS 5/31.1.

#### **FACTS**

- 1. The Respondent is the present owner and occupant and in control and possession of a facility located in the County of Jackson, State of Illinois.
- 2. The facility is an open dump, operating without an Illinois Environmental Protection Agency Operating Permit, and designated with the Site Code # 0778005006. The facility is known to the Agency as the Ava/James Qualls site.
- 3. The Respondent has owned, occupied, controlled and/or operated the facility at all relevant times hereto.
- 4. On February 28, 2006, Don Terry, Field Inspector, Jackson County Health Department, inspected the facility. A true and correct copy of the inspection report, along with Mr. Terry's affidavit, are attached and incorporated herein by reference as Exhibit A.

5. On March 6, 2003, the Illinois Pollution Control Board in docket number AC 03-14 entered an order and found this same Respondent, James Qualls, had violated sections 21(p)(1), 21(p)(5), and 21(p)(7) of the Illinois Environmental Protection Act, 410 ILCS 5/1 et. seq. on this same site pursuant to an Administrative Citation filed by this same Complainant, County of Jackson.

#### **VIOLATIONS**

On the basis of Field Inspector, Don Terry's, direct observation, he has determined that the Respondent has caused or allowed open dumping at the above described facility in a manner that resulted in the following violations:

That on February 28, 2006, an on-site inspection of the facility disclosed the following:

- 1. The Respondent has caused or allowed litter at the facility in violation of 415 ILCS 5/21(p)(1); and
- 2. The Respondent has caused or allowed the deposition of general construction or demolition debris; or clean construction or demolition debris at the facility in violation of 415 ILCS 5/21(p)(7).

#### **CIVIL PENALTY**

In accordance with 415 ILCS 5/42 (b)(4-5), the Respondent is subject to a civil penalty of \$3,000.00 for each second or subsequent violation. Additionally, should the Respondent elect to petition the Illinois Pollution Control Board under the review process described below, after an adjudicatory hearing, the Respondent shall be assessed the hearing costs incurred by the Pollution Control Board. The hearing cost would be in addition to the \$6,000.00 fine.

If you acknowledge the violations cited herein above, the civil penalty shall be due and payable no later than May 1, 2006. If you do not petition the Pollution Control Board for review of the Administrative Citation within 35 days of service of the Administrative Citation, or contest the Citation, any judgment that may be rendered against you shall specify the due date of the civil fine and any additional costs assessed against you.

When payment is made, your check should be made payable to the Jackson County's Treasurer Office and mailed to the attention of Shirley Dillinger Booker, Jackson County Treasurer, Murphysboro, Illinois, 62966. Also, please complete and return the enclosed remittance form, along with your payment, to assure proper credit.

If any civil penalty is not paid within the prescribed time, the law allows for the accumulation and payment of interest on the remaining unpaid balance. If any civil penalty is not paid when due, the Office of the State's Attorney shall be requested to initiate proceedings in Circuit Court to collect the penalty. In addition to the civil penalty, hearing costs, and interest, if any, the Jackson County State's Attorney may seek to recover their costs of litigation.

#### PROCEDURE FOR CONTESTING ADMINISTRATIVE CITATION

You have the right to contest this Citation, pursuant to 415 ILCS 5/31.1. If you elect to contest this Citation, you must file a Petition For Review with the Clerk of the Illinois Pollution Control Board. A copy of the Petition For Review shall be filed with Daniel Brenner, Assistant State's Attorney, Jackson County Courthouse, Third Floor, Murphysboro, Il 62966. Your Petition For Review must be filed within 35 days of the date of service of the present citation on you. If you fail to file your Petition, a Default Order against you will entered

#### by the Pollution Control Board. Your original Petition must be filed with the Clerk of the

#### Board at:

Clerk Pollution Control Board 100 West Randolph, Suite 11-500 Chicago, Illinois 60601-3218

A copy must also be sent to:

Office of the State's Attorney
Daniel Brenner
Assistant State's Attorney
Jackson County Courthouse, 3<sup>rd</sup> Floor
Murphysboro, II 62966

DATED: 3/21 , 2006

Daniel Brenner

**Assistant State's Attorney** 

#### REMITTANCE FORM

COUNTY OF JACKSON,	)	
Complainant,	)	
v.	) N	O. AC 06 -
JAMES QUALLS,	) <sup>'</sup>	
Respondent.	)	
FACILITY:	AVA/JAMES QUALLS	SITE
COUNTY:	JACKSON	
DATE OF INSPECTION:	February 28, 2006	
SITE CODE:	0778005006	
CIVIL PENALTY:	\$6,000.00	
Signature	-1-804	
	NOTE	
Please include the inform	ation on the blank lines	Mail this form with your check

Please include the information on the blank lines. Mail this form with your check to:

Shirley Dillinger Booker Jackson County Treasurer **Jackson County Courthouse** Murphysboro, Illinois, 62966

#### JACKSON COUNTY HEALTH DEPARTMENT

#### **AFFIDAVIT**

IN THE MATTER OF:

077 800 5006 / Jackson County Ava / James Qualls COMPLIANCE FILE

Respondent.

Affiant, Don Terry, being first duly sworn, voluntarily deposes and states as follows:

- 1. Affiant is a field inspector employed by Jackson County Health Department and has been so employed at all times pertinent hereto.
- 2. On February 28, 2006, between the hours of 9:45 am and 10:32 am, Affiant conducted an inspection of the open dump site known as Ava / James Qualls, Jackson County, Illinois.
- 3. Affiant inspected said open dump site by an on-site inspection.
- 4. As a result of the activities referred to in Paragraphs 2 and 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 James Qualls, Ava, Illinois, open dump site.

Don Terry

Solid Waste Inspector

Subscribed and Sworn To before me this 7 day of March . 2006

Notary Public

"OFFICIAL SEAL"
CAROL HOPKINS
NOTARY PUBLIC, STATE OF ILLINOIS
MY COMMISSION EXPIRES 2/28/07

JAMES QUALLS
ADMINISTRATIVE CITATION

EXHIBIT A

# ILLINOIS ENVIRONMENTAL PROTECTION AGENCY Open Dump Inspection Checklist

open Zamp mepeeden enconner					
County:	Jackson	LPC#: 077 800 5006	Region:	7 - Marion	
Location/S	Site Name:	Ava / James Qualls			<del> </del>
Date:	02/28/2006	Time: From 9:45 am To 10:32 am Previous Inspe	ection Date	e: 06/28/20	04
• •	s): Don Te		with calm	winds	
No. of Pho		24 Est. Amt. of Waste: 720 yds <sup>3</sup> Samples Taker	n: Yes#	No	$\boxtimes$
Interviewe					
Latitude:		Longitude: -89.50421 Collection Point Description: Ma			
(Example:	Lat.: 41.26493	Long.: -89.38294) Collection Method: GPS - Accu	racy +/- 8	feet	
Mailing Ad	Mr. James Qualls Responsible Party Ava, IL 62907 Ava, IL 62907				
	SECTION	DESCRIPTION			VIOL
	ILL	INOIS ENVIRONMENTAL PROTECTION ACT REQUI	REMENT	s	
1.	9(a)	CAUSE, THREATEN OR ALLOW AIR POLLUTION IN ILLINOIS	<b>)</b>		
2.	9(c)	CAUSE OR ALLOW OPEN BURNING			
3.	12(a)	CAUSE, THREATEN OR ALLOW WATER POLLUTION IN ILLIN	10IS		
4.	12(d)	CREATE A WATER POLLUTION HAZARD			
5.	21(a)	CAUSE OR ALLOW OPEN DUMPING	-		$\boxtimes$
CONDUCT ANY WASTE-STORAGE, WASTE-TREATMENT, OR WASTE- DISPOSAL OPERATION:					
	(1)	Without a Permit			$\boxtimes$
	(2)	In Violation of Any Regulations or Standards Adopted by the Boar	d		$\boxtimes$
7.	21(e)	DISPOSE, TREAT, STORE, OR ABANDON ANY WASTE, OR T WASTE INTO THE STATE AT/TO SITES NOT MEETING REQU			$\boxtimes$

21(p)

(1)

(2)

(3)

(4)

(5)

(6)

Litter

Scavenging

Open Burning

8.

Deposition of Waste in Standing or Flowing Waters

Standing or Flowing Liquid Discharge from the Dump Site

Proliferation of Disease Vectors

IN ANY OF THE FOLLOWING OCCURRENCES AT THE DUMP SITE:

CAUSE OR ALLOW THE OPEN DUMPING OF ANY WASTE IN A MANNER WHICH RESULTS

LPC# 077 800 5006

Inspection Date: 02/28/2006

	_(7)	Deposition of General Construction or Demolition Debris; or Clean Construction or Demolition Debris	
9.	55(a)	NO PERSON SHALL:	
	(1)	Cause or Allow Open Dumping of Any Used or Waste Tire	$\boxtimes$
	(2)	Cause or Allow Open Burning of Any Used or Waste Tire	
		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	$\boxtimes$
11.	722.111	HAZARDOUS WASTE DETERMINATION	
12.	808.121	SPECIAL WASTE DETERMINATION	
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	
		OTHER REQUIREMENTS	
14.		APPARENT VIOLATION OF: (□) PCB; (□) CIRCUIT COURT CASE NUMBER: ORDER ENTERED ON:	
15.	OTHER:	807.201 Developmental Permit & 807.202 Operational Permit	$\boxtimes$

#### Informational Notes

- 1. [Illinois] Environmental Protection Act: 415 ILCS 5/4.
- 2. Illinois Pollution Control Board: 35 Ill. Adm. Code, Subtitle G.
- 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.

# NARRATIVE INSPECTION REPORT DOCUMENT OPEN DUMP SITE

Site Code: 077 800 5006 County: Jackson

Site Name: Ava / James Qualls Time: 9:45 am - 10:32 am

**Location:** Lat 37.91987 Long -89.50421 **GPS Accuracy:** +/- 8 feet

Approximate Volume of Waste at Site: 720 cu / yds.

#### **GENERAL REMARKS**

During the stated date and time, I conducted an inspection of the site listed above. This inspection was made as a follow up to an inspection conducted on June 28, 2004 during which violations regarding open dumping were observed. I was accompanied on this inspection by Bart Hagston of the Jackson County Health Department. Weather conditions at the time of the inspection were: cloudy with calm winds and a temperature of approximately 63°F.

According to the Jackson County Assessor's Office, the site is owned by James Qualls.

Upon arrival at the site, Mr. Hagston and I called out in loud voices for Mr. Qualls to determine if anyone was home. After several loud calls we received no response.

From Wilson Road, a public roadway, I observed a waste pile to the north of the house (Photos #1 & #2, Site Sketch Area A) consisting of, but not limited to, dimensional lumber, plastic buckets, scrap metal, cardboard, furniture, waste tires and other materials.

South of this pile, I observed another waste pile (Photos #3 & #4, Site Sketch Area A) consisting of, but not limited to, scrap metal, ceramic insulators, furniture, waste tires and other materials.

West of Wilson Road (and on property owned by James Qualls) I observed two mobile homes which appeared abandoned (Photo #5, Site Sketch Area B). I observed no evidence of utility hook ups to either mobile home or evidence of recent use (ie paths through tall grass to the mobile home). In the same area (Area B on Sketch) I observed several vehicles which appeared abandoned (Photos #5 & #6, Site Sketch Area B) since at the time of the inspection, these vehicle were not in use, were not useable in their current condition, and were not stored in such a way as to protect any future use.

Page 2 077 800 5006 Ava / James Qualls February 28, 2006

I walked south along Wilson Road to a location a the south end of the Qualls property. I walked east where I observed a pile of approximately sixty waste tires (**Photo #7**, **Site Sketch Area C**). To the west of the tire pile I observed two other waste piles consisting of, but not limited to, waste tires, dimensional lumber, plumbing fixtures, power lawn mowers, scrap metal, general construction / demolition debris and other materials not readily identifiable (**Photos #8 - #10**, **Site Sketch Area C**).

I walked east through a field where I observed an abandoned truck (Photos #11 & #12, Site Sketch Area D). The truck was lacking current Illinois vehicle registration (Photo #12, Site Sketch Area D) and the bed was filled with waste (Photo #11, Site Sketch Area D).

I walked east to a location where I had observed open dumped waste during a previous inspection (Site Sketch Area E). This area is located along a dirt pathway and is approximately 300 yards long. I began at the south end of the open dumping area and walked north. Along this dirt pathway I observed the following items open dumped: scrap metal, 25 vehicles, two pull behind camper trailers (open to the environment), one mobile home (side missing and open to the environment), metal barrels, waste tires, dimensional lumber, plastic items, cloth items, furniture, and other items too numerous to list. The total amount of waste in this area (Area E on Site Sketch) was approximately 500 cu/yds. At the time of the inspection, the items observed at this site were not in use, were not useable in their current condition, and were not stored in such a way as to protect any future use.

#### **Continuing Violations Observed:**

Item #5(21)(a): Cause or allow open dumping; Item #8(21)(p)(1 & 7): 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 and (7) Deposition of general construction or demolition debris; or clean construction or demolition debris: During this inspection, the open dumping of waste resulting in litter and the deposition of general construction or demolition debris was observed.

Item #6(21)(d)(1): Conduct any waste-storage, waste-treatment, or waste-disposal operation: Without a permit: This office has no record that the owner of this site has a permit from the Agency to conduct any waste-storage, waste-treatment or waste-disposal operation.

Item #6(21)(d)(2): Conduct any waste-storage, waste-treatment, or waste-disposal operation: In violation of any regulations or standards adopted by the Board: During the inspection, violations regarding regulations or standards adopted by the Board regarding litter control and daily cover were observed.

Page 3 077 800 5006 Ava / James Qualls

Item #7(21)(e): Dispose, treat, store, or abandon any waste, or transport any waste into the State at/to sites not meeting requirements of the Act: Due to the amount of waste observed at this site, it is reasonable to conclude that the waste was transported to the site for the purpose of disposal.

<u>Item #9(55)(a)(1)</u>: No person shall: Cause or allow open dumping of any used or waste tire: During the inspection, waste tires that had been open dumped were observed.

Item #10(812.101)(a): Failure to submit an application for a permit to develop and operate a landfill; Item #15(807.201): Failure to obtain a Developmental Permit to operate a solid waste management site; Item #15(807.202): Failure to obtain an Operational Permit to operate a solid waste management site: This office has no record that the site owner has applied for or has received from the Agency a permit to develop or operate a landfill or a solid waste management site.

# OPEN DUMP INSPECTION SITE SKETCH

Date Of Inspection: February 28, 2006

Inspector: Don Terry

Site Code:

077 800 5006

County: Jackson

Site Name:

Ava / James Qualls

**Time:** 9:45 am - 10:32 am

Location:

Lat 37.91987 Long -89.50421

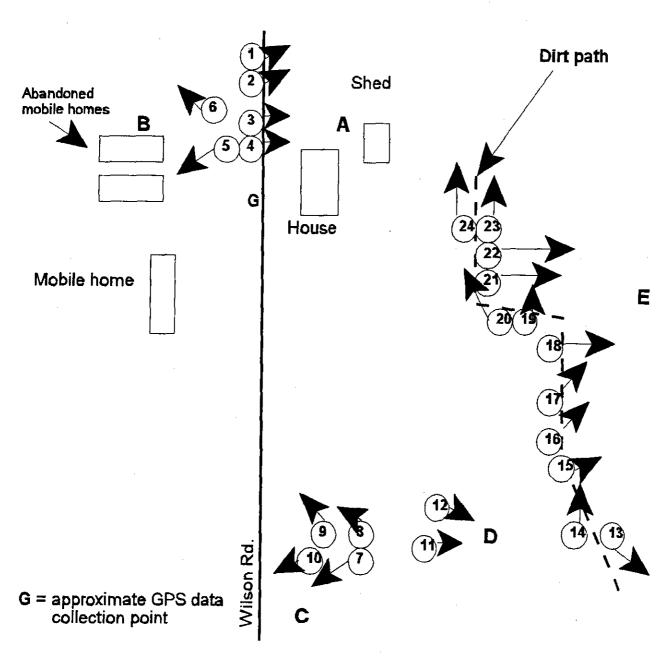
GPS Accuracy = +/-8 feet

#### Not Drawn to Scale

All Locations Are Approximate

O Indicates Approximate Location & Direction of Photos







Date:	February 28, 2006	Site #: 077 800	5006	County:	Jackson

Time: 9:52 am Site Name: Ava / James Qualls

Photo taken by:

Don Terry

Comments – Photo taken towards:

Northeast

**Photo File Name:** 

0778005006-02282006-01



Date: February 28, 2006

Time: 9:52 am

Photo taken by:

Don Terry

Comments – Photo taken towards:

Northeast

**Photo File Name:** 



Date: February 28, 2006 Site #: 077 800 5006 County: **Jackson** 

Time: 9:52 am Site Name: Ava / James Qualls

Photo taken by: Don Terry

Comments – Photo taken towards:

East

**Photo File Name:** 

0778005006-02282006-03



Date: February 28, 2006

Time: 9:53 am
Photo taken by:

Don Terry

Comments – Photo taken towards:

East



**Photo File Name:** 



Date:	February 28, 2006	Site #: 077 800 5006	County:	Jackson
Time:	9:53 am	Site Name: Ava / James Qualls		

Photo taken by:

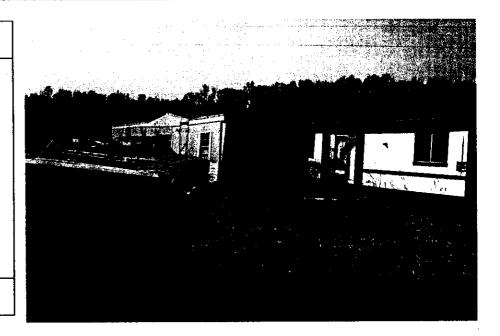
Don Terry

Comments – Photo taken towards:

Southwest

**Photo File Name:** 

0778005006-02282006-05



Date: February 28, 2006

Time: 9:53 am
Photo taken by:

Don Terry

Comments – Photo taken towards:

Northwest



**Photo File Name:** 



Date:	February 28, 2006	Site #: 077 800 5006	County:	Jackson
Time:	10:02 am	Site Name: Ava / James Qualls		

Photo taken by:

Don Terry

Comments – Photo taken towards:

Southwest

**Photo File Name:** 

0778005006-02282006-07



Date: February 28, 2006

Time: 10:02 am

Photo taken by:

Don Terry

Comments — Photo taken towards:

Northwest



**Photo File Name:** 



## Inspection Digital Photo Sheet

Date:	February 28, 2006	Site #: 077 800 5006	County:	Jackson
Time:	10:03 am	Site Name: Ava / James Qualis	į	

Photo taken by: Don Terry

Comments – Photo taken towards:

Northwest

**Photo File Name:** 

0778005006-02282006-09



Date: February 28, 2006

Time: 10:03 am
Photo taken by:

Don Terry

Comments – Photo taken towards:

Southwest



**Photo File Name:** 



Date:	February 28, 2006	Site #: 077 800 5006	County: Jackson
Time:	10:06 am	Site Name: Ava / James Qualls	

Photo taken by: Don Terry

Comments – Photo taken towards:

East

**Photo File Name:** 

0778005006-02282006-11



Date: February 28, 2006

Time: 10:06 am
Photo taken by:

Don Terry

Comments – Photo taken towards:

Southeast



**Photo File Name:** 



## **Inspection Digital Photo Sheet**

 Date:
 February 28, 2006
 Site #: 077 800 5006
 County: Jackson

Time: 10:08 am Site Name: Ava / James Qualls

Photo taken by:

Don Terry

Comments – Photo taken towards:

Southeast

**Photo File Name:** 

0778005006-02282006-13



Date: February 28, 2006

Time: 10:08 am

Photo taken by: Don Terry

Comments –

Photo taken towards:

North



**Photo File Name:** 



Date: February 28, 2006 Site #: 077 800 5006 County: **Jackson** 

Time: 10:09 am Site Name: Ava / James Qualls

Photo taken by:

Don Terry

Comments — Photo taken towards:

Northeast

**Photo File Name:** 

0778005006-02282006-15

Date: February 28, 2006

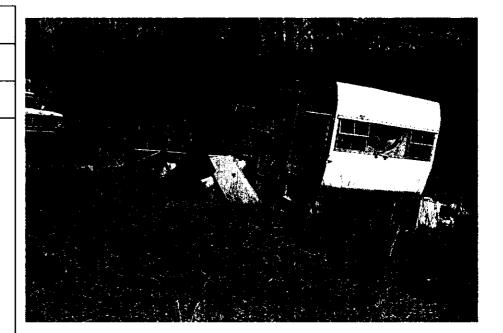
Time: 10:09 am

Photo taken by: Don Terry

Comments -

Photo taken towards:

Northeast



**Photo File Name:** 



## **Inspection Digital Photo Sheet**

 Date:
 February 28, 2006
 Site #: 077 800 5006
 County: Jackson

Time: 10:10 am Site Name: Ava / James Qualls

Photo taken by:

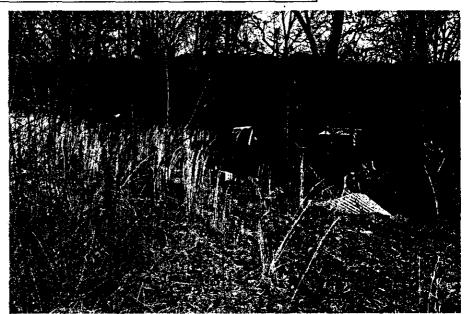
Don Terry

Comments – Photo taken towards:

Northeast

**Photo File Name:** 

0778005006-02282006-17



Date: February 28, 2006

Time: 10:11 am

Photo taken by: Don Terry

Don reny

Comments – Photo taken towards:

East



**Photo File Name:** 



 Date:
 February 28, 2006
 Site #: 077 800 5006
 County: Jackson

Time: 10:12 am Site Name: Ava / James Qualls

Photo taken by:

Don Terry

Comments – Photo taken towards:

North

**Photo File Name:** 

0778005006-02282006-19



Date: February 28, 2006

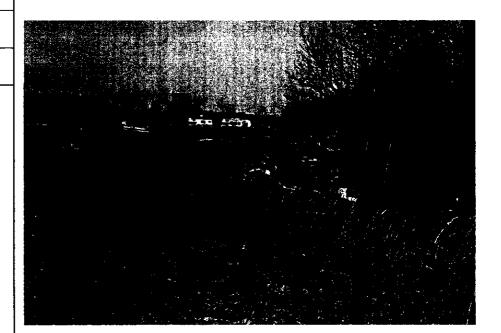
Time: 10:13 am
Photo taken by:

Don Terry

Comments -

Photo taken towards:

North



**Photo File Name:** 



· · ·	· · · · · · · · · · · · · · · · · · ·		
Date: February 28, 2006	Site #: 077 800 5006	County:	Jackson
[			

Time: 10:14 am Site Name: Ava / James Qualls

Photo taken by:

Don Terry

Comments – Photo taken towards:

East

**Photo File Name:** 

0778005006-02282006-21



Date: February 28, 2006

Time: 10:15 am Photo taken by: Don Terry

Comments – Photo taken towards:

East

**Photo File Name:** 





 Date:
 February 28, 2006
 Site #: 077 800 5006
 County: Jackson

Time: 10:16 am Site Name: Ava / James Qualls

Photo taken by:

Don Terry

Comments – Photo taken towards:

North

**Photo File Name:** 

0778005006-02282006-23



Date: February 28, 2006

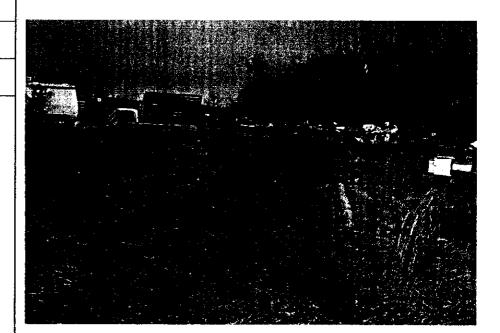
Time: 10:16 am

Photo taken by:

Don Terry

Comments – Photo taken towards:

North



**Photo File Name:**