

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

RECEIVED  
CLERK'S OFFICE

OCT 20 2006

STATE OF ILLINOIS  
Pollution Control Board

County of Wayne, )  
)  
Complainant, )  
)  
vs. )  
)  
Mr. Julian Buchanan, )  
)  
Respondent. )

AC 191-06-06

AC 06-55

NOTICE OF FILING

TO: KEVIN KAKAC  
Wayne County, Illinois, State's Attorney  
P. O. Box 641  
Fairfield, IL 62837

and

Carol Webb  
Hearing Officer  
Illinois Pollution Control Board  
1021 North Grand Avenue East  
P. O. Box 19274  
Springfield, IL 62794-9274

PLEASE TAKE NOTICE that I have filed, with the office of the Clerk of the Illinois Pollution Control Board, a Joint Motion for Withdrawal of Administrative Citation, on behalf of WAYNE COUNTY, ILLINOIS, Complainant, and JULIAN BUCHANAN, Respondent, a copy of which is herewith served upon you.

JULIAN BUCHANAN, Respondent

BY: LAW OFFICE OF  
MICHAEL J. MOLT, LTD.  
Attorney for Respondent

BY: Michael J. Molt  
MICHAEL J. MOLT

DATED this 19 day of October, 2006

LAW OFFICE OF  
MICHAEL J. MOLT, LTD.  
Attorney for Respondent  
P. O. Box 652  
Fairfield, IL 62837  
Telephone: 618/842-4080

PROOF OF SERVICE

The undersigned certifies that a copy of the foregoing instrument was served upon the following listed persons:

KEVIN KAKAC  
Wayne County, Illinois State's Attorney  
P. O. Box 641  
Fairfield, IL 62837

Carol Webb  
Hearing Officer  
Illinois Pollution Control Board  
1021 North Grand Avenue East  
P. O. Box 19274  
Springfield, IL 62794-9274

by enclosing the same in an envelope addressed to such person at their addresses as disclosed by the pleadings of record herein and as listed above, with postage fully prepaid and by depositing said envelope in a U.S. Post Office mail box in Fairfield, Illinois, on the 19th day of October, 2006.

Michael J. Molt

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

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 )  
 Respondent. )

**JOINT MOTION TO WITHDRAW  
ADMINISTRATIVE CITATION**

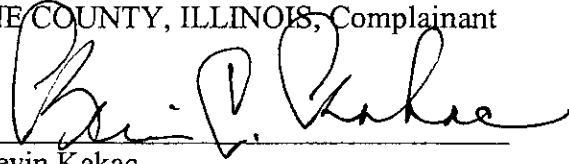
Now comes WAYNE COUNTY ILLINOIS, Complainant, by KEVIN KAKAC, Wayne County, Illinois States Attorney and JULIAN BUCHANAN, Respondent, by his attorney, the LAW OFFICE OF MICHAEL J. MOLT, LTD., and for their Joint Motion to Withdraw Administrative Citation regarding the site which is owned by JULIAN BUCHANAN, Respondent, which gave rise to the issuance of the Administrative Citation in this case and which has been properly cleaned so that currently no violation of the Illinois Environmental Protection Act exists on the site in question and state the following:

1. That WAYNE COUNTY ILLINOIS, Complainant, hereby requests that the Administrative Citation issued in this case be withdrawn and that the case be closed.
2. JULIAN BUCHANAN, Respondent, hereby requests that the Illinois Pollution Control Board allow WAYNE COUNTY ILLINOIS, Complainant, to withdraw the Administrative Citation and close the above captioned case.

WHEREFORE, WAYNE COUNTY ILLINOIS, Complainant, and JULIAN BUCHANAN, Respondent, both respectively request that the Administrative Citation

issued in this case be withdrawn and that the Illinois Pollution Control Board close the above captioned case.

WAYNE COUNTY, ILLINOIS, Complainant



BY: Kevin Kakac  
Wayne County State's Attorney

JULIAN BUCHANAN, Respondent

BY: LAW OFFICE OF  
MICHAEL J. MOLT, LTD.  
Attorney for Respondent

BY:   
MICHAEL J. MOLT

LAW OFFICE OF  
MICHAEL J. MOLT, LTD.  
Attorney for Respondent  
P. O. Box 652  
Fairfield, IL 62837  
Telephone: 618/842-4080

PROOF OF SERVICE

The undersigned certifies that a copy of the foregoing instrument was served upon the following listed persons;

KEVIN KAKAC  
Wayne County, Illinois State's Attorney  
P. O. Box 641  
Fairfield, IL 62837

Carol Webb  
Hearing Officer  
Illinois Pollution Control Board  
1021 North Grand Avenue East  
P. O. Box 19274  
Springfield, IL 62794-9274

by enclosing the same in an envelope addressed to such persons at their addresses as disclosed by the pleadings of record herein and as listed above, with postage fully prepaid and by depositing said envelope in a U.S. Post Office mail box in Fairfield, Illinois, on the 17<sup>th</sup> day of OCTOBER, 2006.

Michael J. Mall

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

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OCT 20 2006  
STATE OF ILLINOIS  
Pollution Control Board

County of Wayne, )  
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Complainant, )  
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vs. ) AC 191-06-06  
)  
Mr. Julian Buchanan, )  
)  
Respondent. )

CERTIFICATE OF SERVICE

I hereby certify that I did, on the 19<sup>th</sup> day of October, 2006, send, by U. S. mail, with postage fully pre-paid, by depositing in the United States Post Office box in Fairfield, Illinois, a true and correct copy of a Joint Motion to Withdraw Administrative Citation with said envelope addressed to KEVIN KAKAC, Wayne County Courthouse, P. O. Box 641, Fairfield, IL 62837, and to Carol Webb, Hearing Officer, Illinois Pollution Control Board, 1021 North Grand Avenue East, P. O. Box 19274, Springfield, IL 62794-9274 and the original and one copy of said Motion for Reconsideration on the same date by U. S. Express Mail with postage fully pre-paid, by depositing in the United States Post Office Box in Fairfield, Illinois the original and one copy of the Motion for Reconsideration addressed to: DOROTHY GUNN, Clerk, Pollution Control Board, James R. Thompson Center, 100 West Randolph Street, Suite 11-500, Chicago, IL 60601.

JULIAN BUCHANAN, Respondent

BY: LAW OFFICE OF  
MICHAEL J. MOLT, LTD.  
Attorney for Respondent

BY: Michael J. Molt  
MICHAEL J. MOLT