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STATE OF ILLINOIS
Pollution Control Board

**BEFORE THE POLLUTION CONTROL BOARD
OF THE STATE OF ILLINOIS**

FEDEX GROUND PACKAGE SYSTEM, INC.,)
Petitioner,)
)
v.) PCB 07-12
) (UST Appeal)
ILLINOIS ENVIRONMENTAL)
PROTECTION AGENCY,)
Respondent.)

NOTICE

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

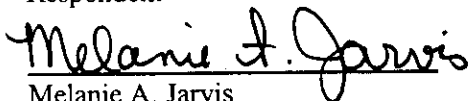
Bradley Halloran, Hearing Officer
Illinois Pollution Control Board
James R. Thompson Center
100 West Randolph Street, Suite 11-500
Chicago, IL 60601

Thomas W. Daggett
Daggett Law Firm
Chicago Title Tower, Suite 4950
161 North Clark Street
Chicago, IL 60601

PLEASE TAKE NOTICE that I have today filed with the office of the Clerk of the Pollution Control Board a MOTION FOR LEAVE TO SUPPLEMENT ADMINISTRATIVE RECORD and the SUPPLEMENTAL ADMINISTRATIVE RECORD, copies of which are herewith served upon you.

Respectfully submitted,

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY,
Respondent



Melanie A. Jarvis
Assistant Counsel
Division of Legal Counsel
1021 North Grand Avenue, East
P.O. Box 19276
Springfield, Illinois 62794-9276
217/782-5544
217/782-9143 (TDD)
Dated: November 2, 2006

**BEFORE THE POLLUTION CONTROL BOARD
OF THE STATE OF ILLINOIS**

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FEDEX GROUND PACKAGE SYSTEM, INC.,)	
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ILLINOIS ENVIRONMENTAL)	
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MOTION FOR LEAVE TO SUPPLEMENT ADMINISTRATIVE RECORD

NOW COMES the Respondent, the Illinois Environmental Protection Agency ("Illinois EPA"), by one of its attorneys, Melanie A. Jarvis, Assistant Counsel and Special Assistant Attorney General, and, pursuant to 35 Ill. Adm. Code 101.508 and 105.212, hereby requests that the Illinois Pollution Control Board ("Board") grant leave to file a supplement to the Administrative Record filed previously. In support of this motion, the Illinois EPA states as follows:

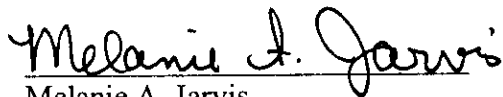
1. On August 31, 2006, the Illinois EPA mailed for filing the Administrative Record in this proceeding.
2. During a status conference with the Hearing Officer on September 21, 2006 Petitioner requested that the Respondent add documents to the administrative record. The Respondent agreed.
3. On October 24, 2006, the Petitioner via email and regular mail sent the Respondent a written request setting forth the specific documents that the Petitioner wanted to add to the record. (See attached letter)
4. The request to supplement the record is by mutual agreement of the parties, therefore no hardship to either party should occur due to the filing of this Supplemental

Administrative Record. The Board has allowed such supplements to Administrative Records in the cases of Strube v. IEPA, PCB 91-205; Des Plaines River Watershed Alliance et. al. v. IEPA and the Village of New Lenox, PCB 04-88; and Quantum Chemical v. IEPA, PCB 89-16. The inclusion of these documents should be allowed to complete the Administrative Record before the Board.

WHEREFORE, for the reasons stated herein, the Illinois EPA respectfully requests that the Board grant leave to file a supplement to the Administrative Record.

Respectfully submitted,

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY,
Respondent



Melanie A. Jarvis
Assistant Counsel
Special Assistant Attorney General
Division of Legal Counsel
1021 North Grand Avenue, East
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Springfield, Illinois 62794-9276
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Dated: November 2, 2006

This filing submitted on recycled paper.

CERTIFICATE OF SERVICE

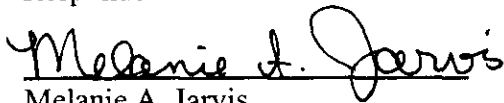
I, the undersigned attorney at law, hereby certify that on November 2, 2006 I served true and correct copies of a MOTION FOR LEAVE TO SUPPLEMENT ADMINISTRATIVE RECORD and the SUPPLEMENTAL ADMINISTRATIVE RECORD, by placing true and correct copies thereof in properly sealed and addressed envelopes and by depositing said sealed envelopes in a U.S. Mail drop box located within Springfield, Illinois, with sufficient First Class postage affixed thereto, upon the following named persons:

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

Bradley Halloran, Hearing Officer
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