

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD
ADMINISTRATIVE CITATION

RECEIVED
CLERK'S OFFICE
MAY 14 2007
STATE OF ILLINOIS
Pollution Control Board

AC07-54

ILLINOIS ENVIRONMENTAL)
PROTECTION AGENCY,)
)
Complainant,)
)
v.)
)
ADOLPH M. LO)
)
Respondent.)

LPC #0198205006
(IEPA No. 113-07-AC) Champaign County, IL

RESPONSE TO CITATION AND ENTRY OF APPEARANCE

Adolf M. Lo, by his attorneys, Miller & Hendren, LLP, for his Response to the Citation herein made, states that:

1. He has cleared the subject property, and will continue to clean up debris deposited on his land by others.
2. Prior to the entry of this Citation, Respondent had cleared the subject premise on at least two occasions from unauthorized dumping on his property.
3. The residence property was then broken into, with windows smashed, plumbing and fixtures removed, leaving the house in deplorable condition, and with rejects and garbage items strewn on the land.
4. The condition reviewed by the environmental inspection was caused by unknown parties on several occasions, with an effort each time by the Respondent to clear the property.
5. Assurance is hereby given that Respondent will timely act each time to correct known violations of environmental regulations by those trespassers.

WHEREFORE, Respondent respectfully requests that the Citation be vacated on the grounds that he will expend every effort to clear dumping by trespassers.

Respectfully submitted,

Adolf M. Lo

Adolph M. Lo

By: ~~Miller & Hendren, LLP~~, His Attorneys
Shirley W. Miller

Counsel

Prepared by:
Miller & Hendren, LLP
P.O. Box 980
Champaign, IL 61824-0980
Tel (217) 352-2171
Fax (217) 352-3839

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CERTIFICATE OF SERVICE OF:

- A. Notice of Filing of Response to Citation;
- B. Notice of Entry of Appearance thereto.

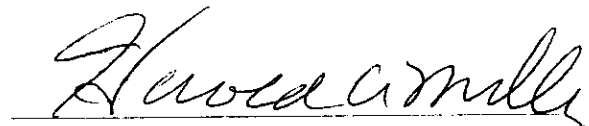
To: Clerk of Illinois Pollution Control Board
State of Illinois Center
100 West Randolph, Suite 115
Chicago, IL 60601

and to

Illinois Environmental Agency's Division
Legal Counsel
1021 North Grand East
P.O. Box 19276
Springfield, IL 62794-9276

The undersigned, for and on behalf of Adolf M. Lo, Respondent, hereby certifies that on this date, the above addresses were duly provided a copy of his Response to the above entitled Citation, by forwarding copies thereof to each by depositing the same in the U.S. Mail Service in Champaign, Illinois, properly addressed, and with appropriate postage affixed.

May 10, 2007



Prepared by:
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