

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

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

v.)

PCB NO. 2010-
(Enforcement-Land)

DON SWINSON, an individual, and)
CHAMPION ENVIRONMENTAL)
SERVICES, INC., a Wisconsin)
corporation,)
)
Respondents.)

NOTICE OF FILING

TO: Donald R. Swinson
2621 Baxter Road
Rockford, Illinois 61109

Clerk
Illinois Pollution Control Board
James R. Thompson Center
100 W. Randolph Street, Ste. 11-500
Chicago, Illinois 60601

Champion Environmental Services, Inc.
Barbara J. Gorniak
Registered Agent
38 West End Drive
Gilberts, IL 60136-9657

PLEASE TAKE NOTICE that I have today filed with the Office of the Clerk of the Illinois Pollution Control Board a Complaint, Notice of Filing, and a Certificate of Service on behalf of the People of the State of Illinois, a copy of which is attached and herewith served upon you.


Section 103.204(f) of the Pollution Control Board Procedural Rules, 35 Ill. Adm. Code 103.204(f) provides: "Failure to file an answer to this complaint within 60 days may have severe consequences. Failure to answer will mean that all allegations in the complaint will be taken as if admitted for purposes of this proceeding. If you have any questions about this procedure,

you should contact the hearing officer assigned to this proceeding, the Clerk's Office or an attorney."

Respectfully submitted,

PEOPLE OF THE STATE OF ILLINOIS

LISA MADIGAN
Attorney General
State of Illinois

BY: 

ZEMEHERET BEREKET-AB
Assistant Attorney General
Environmental Bureau
69 W. Washington St., 18th Flr.
Chicago, IL 60602
(312) 814-3816

DATE: July 28, 2009

THIS FILING IS SUBMITTED ON RECYCLED PAPER

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

PEOPLE OF THE STATE OF ILLINOIS,)	
ex rel. LISA MADIGAN, Attorney General)	
of the State of Illinois,)	
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Complainant,)	
)	PCB NO. 2010-
v.)	(Enforcement – Land)
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DON SWINSON, an individual, and)	
CHAMPION ENVIRONMENTAL)	
SERVICES, INC., a Wisconsin)	
Corporation,)	
)	
Respondents.)	

COMPLAINT

Complainant, PEOPLE OF THE STATE OF ILLINOIS, *ex rel.* LISA MADIGAN, Attorney General of the State of Illinois, on her own motion and at the request of the Illinois Environmental Protection Agency, complains of Respondents DON SWINSON, an individual and CHAMPION ENVIRONMENTAL SERVICES, Inc., a Wisconsin corporation as follows:

COUNT I

OPEN DUMPING

1. This Count is brought on behalf of the PEOPLE OF THE STATE OF ILLINOIS, by LISA MADIGAN, Attorney General of the State of Illinois, on her own motion and at the request of the Illinois Environmental Protection Agency (“Illinois EPA”), pursuant to Section 31 of the Illinois Environmental Protection Act (“Act”), 415 ILCS 5/31 (2008).

2. The Illinois EPA is an administrative agency of the State of Illinois, created pursuant to Section 4 of the Act, 415 ILCS 5/4 (2008), and charged, *inter alia*, with the duty of enforcing the Act.

3. At all times relevant to this Complaint, Respondent, DON SWINSON (“Swinson”), an individual, was and is an Illinois citizen.

4. At all times relevant to this Complaint, Swinson owned and continues to own a vacant lot located at 2000 Cunningham Road, City of Rockford, Winnebago County, Illinois, where a recycling operation was conducted (“Site”).

5. At all times relevant to this Complaint, CHAMPION ENVIRONMENTAL SERVICE, Inc., (“Champion”) was and is a Wisconsin corporation authorized to transact business in the State of Illinois.

6. On March 26, 2008, the EPA inspected the Site in response to a citizen complaint.

7. The Illinois EPA inspection determined that the City of Rockford had contracted with Champion to demolish a large building previously used as a garage and storage by the City of Rockford Public Works Department. The demolition project was located at 500 S. Independence Avenue, Rockford, Winnebago County, Illinois. Most of the demolition debris was transported from the demolition project to the Site by Champion.

8. Once the demolition debris was hauled to the Site, workers would hand pick bricks, metal, and other discarded materials out of the debris for sale or recycling purposes.

9. During the March 26, 2008 inspection, the Illinois EPA observed workers salvaging brick from demolition debris and creating piles of salvaged bricks, piles of demolition debris and piles of timber. The Site did not have a permit to handle general construction or demolition debris.

10. On May 1, 2008, the Illinois EPA issued a Violation Notice pursuant to Section 31(a)(1) of the Act, 415 ILCS 5/31(a)(1) (2008).

11. On June 13, 2008, the Respondents responded to the Section 31 Violation Notice and submitted a proposed compliance commitment agreement (“CCA”).
12. On July 1, 2008, the Illinois EPA rejected the proposed CCA.
13. On July 17, 2008, the Illinois EPA conducted a follow up inspection and observed that most of the general construction or demolition (“C&D”) debris was removed from the Site.
14. On August 28, 2008, the Illinois EPA sent a Notice of Intent to Pursue Legal Action (“NITPLA”) to the owner of the Site, Don Swinson.
15. On September 16, 2008, Mr. Swinson attended a meeting pursuant to the NITPLA letter.
16. Section 3.160 of the Act, 415 ILCS 5/3.160 (2008), provides the following definition:
 - a. “General construction or demolition debris” means non-hazardous, uncontaminated materials resulting from the construction, remodeling, repair and demolition of utilities, structures, and roads, limited to the following: bricks; concrete; and other masonry materials; soil; rock; wood, including non-hazardous painted, treated, and coated wood and wood products; wall coverings; plaster; drywall; plumbing fixtures; non-asbestos insulation; roofing shingles and other roof coverings; reclaimed asphalt pavement; glass; plastics that are not sealed in a manner that conceals waste; electrical wiring and components containing no hazardous substances; and piping or metals incidental to any of those materials.

General construction or demolition debris does not include uncontaminated soil generated during construction, remodeling, repair, and demolition of utilities, structures, and roads provided the uncontaminated soil is not commingled with any general construction or demolition debris or other waste.
17. The brick, concrete, timber, and other demolition debris that was transported to the Site by Champion and accepted by Swinson constitutes “general construction or demolition debris,” as that term is defined in Section 3.160 of the Act, 415 ILCS 5/3.160 (2008).
18. Section 3.315 of the Act, 415 ILCS 5/3.315 (2008), provides the following definition:

"PERSON" is an individual, partnership, co-partnership, firm, company, limited liability company, corporation, association, joint stock company, trust estate, political subdivision, state agency, or other legal entity, or their legal representative, agent or assigns.

19. Swinson and Champion are each a "person" as that term is defined in Section 3.315 of the Act, 415 ILCS 5/3.315 (2008).

20. Section 21(a) of the Act, 415 ILCS 5/21(a) (2008), provides as follows:

No person shall:

a. Cause or allow the open dumping of any waste.

21. Section 3.305 of the Act, 415 ILCS 5/3.305 (2008), provides the following definition:

"OPEN DUMPING" means the consolidation of refuse from one or more sources at a disposal site that does not fulfill the requirements of a sanitary landfill.

22. Section 3.385 of the Act ILCS 5/3.385 (2008) defines "refuse" as waste.

23. Section 3.535 of the Act, 415 ILCS 5/3.535 (2008), defines "waste" as "...any garbage, ... or other discarded material, including solid, liquid, semi-solid..."

24. The general construction or demolition debris ("C&D") and other discarded material disposed of at the Site are "waste" as that term is defined in Section 3.535 of the Act, 415 ILCS 5/3.525 (2008).

25. Section 3.185 of the Act, 415 ILCS 5/3.185 (2008), provides the following definition:

"Disposal" means the discharge, deposit, injection, dumping, spilling, leaking or placing of any waste or hazardous waste into or on any land or water or into any well so that such waste or hazardous waste or any constituent thereof may enter the environment or be emitted into the air or discharged into any waters, including ground waters.

26. Respondents' dumping, depositing, or placing of waste at the Site consisting of bricks, metal, timber and other materials resulting from the demolition of a structure, constitutes "disposal," as that term is defined in Section 3.185 of the Act, 415 ILCS 5/3.185 (2008).

27. Section 3.445 of the Act, 415 ILCS 5/3.445 (2008), provides the following definition:

"Sanitary landfill" means a facility permitted by the Agency for the disposal of waste on land meeting the requirements of the Resource Conservation and Recovery Act, P.L. 94-580, and regulations thereunder, and without creating nuisances or hazards to public health or safety, by confining the refuse to the smallest practical volume and covering it with a layer of earth at the conclusion of each day's operation, or by such other methods and intervals as the Board may provide by regulation.

28. The Site, where Respondents dumped, deposited, or placed waste does not meet the requirements of a "sanitary landfill," as that term is defined in Section 3.445 of the Act, 415 ILCS 5/3.445 (2008), as Respondents did not apply for nor receive any permit from the Illinois EPA to operate a landfill at the Site.

29. From at least March 26, 2008, until July 17, 2008, Respondents caused or allowed the consolidation of refuse from one or more sources at the Site which does not fulfill the requirements of a sanitary landfill thereby engaging in open dumping.

30. By causing or allowing the open dumping of waste at a Site that does not fulfill the requirements of a sanitary landfill, Respondents violated Section 21 (a) of the Act, 415 ILCS 5/21 (a) (2008).

WHEREFORE, Complainant, PEOPLE OF THE STATE OF ILLINOIS, respectfully requests that the Illinois Pollution Control Board ("Board") enter an order against the Respondents, Champion, and Swinson, as follows:

1. Authorizing a hearing in this matter at which time the Respondents will be required to answer the allegations herein;

2. Finding that the Respondents have violated Section 21(a) of the Act, 415 ILCS 5/21(a) (2008);

3. Ordering the Respondents to cease and desist from any further violations of Section 21(a) of the Act, 415 ILCS 5/21(a) (2008);

4. Assessing against Respondents a civil penalty of Fifty Thousand Dollars (\$50,000.00) for each violation of Section 21(a) of the Act, 415 ILCS 5/21(a) (2008), with an additional penalty of Ten Thousand Dollars (\$10,000.00) for each day of violation;

5. Ordering Respondents to pay all costs, pursuant to Section 42(f) of the Act, 415 ILCS 5/42(f) (2008), including attorney, expert witness, and consultant fees expended by the State in its pursuit of this action; and

6. Granting such other relief as the Board deems appropriate and just.

COUNT II

**CONDUCTING A WASTE STORAGE
OR WASTE DISPOSAL OPERATION WITHOUT A PERMIT**

1-29. The Complainant realleges and incorporates herein by reference paragraphs 1 through 29 of Count I, as paragraphs 1 through 29 of this Count II.

30. Section 21(d)(1) of the Act, 415 ILCS 5/21(d)(1) (2008), provide in pertinent part as follows:

No person shall:

(d) Conduct any waste-storage, waste-treatment, or waste-disposal operation:

(1) without a permit granted by the Agency or in violation of any conditions imposed by such permit,

31. From sometime prior to March 26, 2008, and continuing to July 17, 2008, Champion transported and disposed of waste at the Site. Swinson as owner of the Site allowed waste to be deposited at the Site without a permit granted by the Agency.

32. By disposing of C&D waste at the Site, without a permit granted by the Agency, Respondents violated Section 21(d)(1) of the Act, 415 ILCS 5/21(d)(1) (2008).

WHEREFORE, Complainant, PEOPLE OF THE STATE OF ILLINOIS, respectfully requests that the Board enter an order against the Respondents Swinson and Champion as follows:

1. Authorizing a hearing in this matter at which time the Respondents will be required to answer the allegations herein;
2. Finding that the Respondents have violated Section 21(d)(1) of the Act, 415 ILCS 5/21(d)(1) (2008);
3. Ordering the Respondents to cease and desist from any further violations of Section 21(d)(1) of the Act, 415 ILCS 5/21(d)(1) (2008);
4. Assessing against Respondents a civil penalty of Fifty Thousand Dollars (\$50,000.00) for each violation of Section 21(d)(1) of the Act, 415 ILCS 5/21(d)(1) (2008), with an additional penalty of Ten Thousand Dollars (\$10,000.00) for each day of violation;
5. Ordering Respondents to pay all costs of this action, pursuant to Section 42(f) of the Act, 415 ILCS 5/42(f) (2008), including attorney, expert witness and consultant fees expended by the State in its pursuit of this action; and
6. Granting such other relief as the Board deems appropriate and just.

COUNT III

**DEVELOPMENT AND OPERATION OF A SOLID WASTE
MANAGEMENT SITE IN VIOLATION OF BOARD REGULATIONS**

1-32. Complainant realleges and incorporates by reference herein paragraphs 1 through 32 of Count II as paragraphs 1 through 32 of this Count III.

33. Section 21(d)(2) of the Act, 415 ILCS 5/21(d)(2)(2008), provides as follows:

No person shall:

* * *

(d) Conduct any waste-storage, waste-treatment, or waste-disposal operation:

* * *

(2) in violation of any regulations or standards adopted by the Board under this Act,

34. Section 807.201 of the Illinois Pollution Control Board ("Board"), Waste Disposal Regulations, 35 Ill. Adm. Code 807.201, titled, Development Permits, provides as follows:

Subject to such exemption as expressly provided in Section 21(e) of the Environmental Protection Act as to the requirement of obtaining a permit, no person shall cause or allow the development of any new solid waste management site or cause or allow the modification of an existing solid waste management site without a Development Permit issued by the Agency.

35. Section 807.202(a) of the Board Waste Disposal Regulations, 35 Ill. Adm. Code 807.202(a), titled, Operating Permits, provides as follows:

Subject to such exemption as expressly provided in Section 21(e) of the Environmental Protection Act as to the requirement of obtaining a permit, no person shall cause or allow the use or operation of any solid waste management site for which a Development Permit is required under Section 807.201 without an Operating Permit issued by the Agency, except for such testing operations as may be authorized by the Development Permit.

36. Section 807.104 of the Board Waste Disposal Regulations, 35 Ill. Adm. Code 807.104, titled, Definitions, provides in pertinent part, as follows:

"Development" means construction or installation of a unit.

"Owner" means a person who has an interest, directly or indirectly, in land, including a leasehold interest, on which a person conducts a waste treatment, waste storage or waste disposal operation. The "owner" is the "operator" if there

is no other person who is conducting a waste treatment, waste storage or waste disposal operation.

“Site” means any location, place or tract of land used for waste management. A site may include one or more units.

“Solid waste” means waste.

“Solid waste management” means “waste management.”

“Unit” means any device, mechanism, equipment or area used for storage, treatment or disposal of waste.

“Waste management” means the process of storage, treatment or disposal of waste, not including hauling or transport.

37. Swinson, as owner of the Site has not obtained from the Illinois EPA a Development Permit or an Operating Permit to develop and operate a new solid waste management site nor has Swinson submitted an application for a permit to develop or operate a new solid waste management site.

38. The storage and the disposal of the C&D waste at the Site constitutes "waste management", as that term is defined by 35 Ill. Adm. Code 807.104.

39. From at least March 26, 2008, until July 17, 2008, the site was a "waste management" site, as that term is defined by 35 Ill. Adm. Code 807.104.

40. From at least March 26, 2008, and continuing until July 17, 2008, Swinson, by the actions as alleged herein, has violated Section 21(d)(2) of the Act, 415 ILCS 5/21(d)(2)(2008), and Sections 807.201, 807.202(a) of the Board Waste Disposal Regulations, 35 Ill. Adm. Code 807.201, 807.202(a).

WHEREFORE, Complainant, PEOPLE OF THE STATE OF ILLINOIS, respectfully requests that the Board enter an order against Swinson on this Count III as follows:

1. Authorizing a hearing in this matter at which time Swinson will be required to answer the allegations herein;

2. Finding that Swinson has violated Section 21(d)(2) of the Act, 415 ILCS 5/21(d)(2) (2008), and Sections 807.201 and 807.202(a) of the Board Waste Disposal Regulations, 35 Ill. Adm. Code 807.201 and 807.202(a);

3. Ordering Swinson to cease and desist from any further violations of Section 21(d)(2) of the Act, 415 ILCS 5/21(d)(2) (2008), and Sections 807.201 and 807.202(a) of the Board Waste Disposal Regulations, 35 Ill. Adm. Code 807.201 and 807.202(a);

4. Assessing a civil penalty of Fifty Thousand Dollars (\$50,000.00) for each violation of the Act and Board regulations with an additional penalty of Ten Thousand Dollars (\$10,000.00) for each day of violation;

5. Ordering Swinson to pay all costs of this action, pursuant to Section 42(f) of the Act, 415 ILCS 5/42(f) (2008), including attorney, expert witness and consultant fees expended by the State in its pursuit of this action; and

6. Granting such other relief as the Board deems appropriate and just.

COUNT IV

DISPOSAL OF WASTE AT AN UNPERMITTED FACILITY

1-29. Complainant realleges and incorporates by reference herein paragraphs 1 through 29 of Count I as paragraphs 1 through 29 of this Count IV.

30. Section 21(e) of the Act, 415 ILCS 5/21(e) (2008), provides as follows:

No person shall:

* * *

(e) Dispose, treat, store or abandon any waste, or transport any waste into this State for disposal,

treatment, storage or abandonment, except at a site or facility which meets the requirements of this Act and of regulations and standards thereunder.

31. The Site has never been permitted by the Illinois EPA for the disposal or treatment or storage of waste.

32. From at least March 26, 2008, and continuing until July 17, 2008, the Respondents have disposed, treated or stored waste consisting of C&D waste in violation of Section 21(e) of the Act, 415 ILCS 5/21(e)(2008).

WHEREFORE, Complainant, PEOPLE OF THE STATE OF ILLINOIS, respectfully requests that the Board enter an order against the Respondents, Swinson and Champion on this Count IV as follows:

1. Authorizing a hearing in this matter at which time the Respondents will be required to answer the allegations herein;
2. Finding that the Respondents have violated Section 21(e) of the Act, 415 ILCS 5/21(e) (2008);
3. Ordering the Respondents to cease and desist from any further violations of Section 21(e) of the Act, 415 ILCS 5/21(e) (2008);
4. Assessing against Respondents a civil penalty of Fifty Thousand Dollars (\$50,000.00) for each violation of Section 21(e) of the Act, 415 ILCS 5/21(e) (2008), with an additional penalty of Ten Thousand Dollars (\$10,000.00) for each day of violation;
5. Ordering Respondents to pay all costs of this action, pursuant to Section 42(f) of the Act, 415 ILCS 5/42(f) (2008), including attorney, expert witness and consultant fees expended by the State in its pursuit of this action; and
6. Granting such other relief as the Board deems appropriate and just.

COUNT V

CAUSING OR ALLOWING LITTER

1-30. Complainant realleges and incorporates by reference herein paragraphs 1 through 30 of Count I as paragraphs 1 through 30 of this Count V.

31. Section 21(p) of the Act, 415 ILCS 5/21(p) (2008), provides in pertinent part as follows:

No person shall:

* * *

(p) In violation of subdivision (a) of this Section, 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;

32. From at least March 26, 2008, and continuing until at least July 17, 2008, Respondents have caused or allowed the open dumping of waste, in violation of Section 21(a) of the Act, 415 ILCS 5/21(a)(2008) which resulted in litter.

33. The Respondents, by their actions as alleged herein, have violated Section 21(p)(1) of the Act, 415 ILCS 5/21(p) (1)(2008).

WHEREFORE, Complainant, PEOPLE OF THE STATE OF ILLINOIS, respectfully requests that the Board enter an order against the Respondents, Swinson and Champion on this Count V as follows:

1. Authorizing a hearing in this matter at which time the Respondents will be required to answer the allegations herein;

2. Finding that the Respondents have violated Section 21(p)(1) of the Act, 415 ILCS 5/21(p)(1) (2008);

3. Ordering the Respondents to cease and desist from any further violations of Section 21(p)(1) of the Act, 415 ILCS 5/21(p)(1) (2008);

4. Assessing against Respondent a civil penalty of Fifty Thousand Dollars (\$50,000.00) for each violation of Section 21(p)(1) of the Act, 415 ILCS 5/21(p)(1) (2008), with an additional penalty of Ten Thousand Dollars (\$10,000.00) for each day of violation;

5. Ordering Respondent to pay all costs of this action, pursuant to Section 42(f) of the Act, 415 ILCS 5/42(f) (2008), including attorney, expert witness and consultant fees expended by the State in its pursuit of this action; and

6. Granting such other relief as the Board deems appropriate and just.

COUNT VI

**FAILURE TO SUBMIT NOTIFICATION OF ACCEPTANCE
OF GENERAL C&D PRIOR TO INITIAL ACCEPTANCE**

1-29. Complainant realleges and incorporates by reference herein, paragraphs 1 through 29 of Count I as paragraphs 1 through 29 of this Count VI.

30. Section 22.38(b)(11) of the act, 415 ILCS 5/22.38(b)(11) (2008), provides as follows:

(b) An owner or operator of a facility accepting exclusively general construction or demolition debris for transfer, storage, or treatment shall:

* * *

(11) submit to the Agency at least 30 days prior to the initial acceptance of general construction or demolition debris at the facility, on forms provided the Agency, the following information:

- (A) the name, address, and telephone number of both the facility owner and operator;
- (B) the street address and location of the facility;
- (C) a description of facility operations;
- (D) a description of the tagging and recordkeeping procedures the facility will employ to
 - (i) demonstrate compliance with this Section and
 - (ii) identify the source and transporter of all material accepted by the facility;
- (E) the name and location of the disposal site be used for the transportation and disposal of non-recyclable materials accepted at the facility;
- (F) the name and location of an individual, facility, or business to which recyclable materials will be transported; and
- (G) other information as specified on the forms provided by the Agency.

When any information contained or processes described in the initial notification form submitted to the Agency changes, the owner and operator shall submit an updated form within 14 days of the change.

31. Swinson did not submit to the Illinois EPA any of the information required by Section 22.38(b)(11), 415 ILCS 5/22.38(b)(11) (2008), at least 30 days prior to the acceptance of general C&D waste for transfer, storage, or treatment at the Site.

32. By failing to submit to the Illinois EPA the necessary information prior to accepting C&D waste at the Site, Swinson violated Section 22.38(b)(11) of the Act, 415 ILCS 5/22.38(b)(11) (2008).

WHEREFORE, Complainant, PEOPLE OF THE STATE OF ILLINOIS, respectfully requests that the Board enter an order against Swinson on this Count VI as follows:

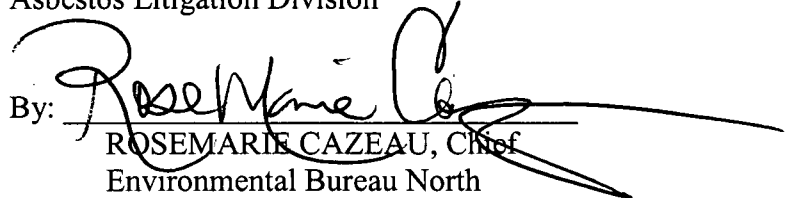
1. Authorizing a hearing in this matter at which time Swinson will be required to answer the allegations herein;
2. Finding that the Swinson has violated Section 22.38(b)(11) of the Act, 415 ILCS 5/22.38 (b)(11) (2008);
3. Ordering the Swinson to cease and desist from any further violations of Section 22.38(b)(11) of the Act, 415 ILCS 5/22.38(b)(11) (2008);
4. Assessing against Swinson a civil penalty of Fifty Thousand Dollars (\$50,000.00) for each violation of Section 22.38(b)(11) of the Act, 415 ILCS 5/22.38(b)(11) (2008), with an additional civil penalty of Ten Thousand Dollars (\$10,000.00) for each day of violation;
5. Ordering Swinson to pay all costs of this action, pursuant to Section 42(f) of the Act, 415 ILCS 5/42(f) (2008), including attorney, expert witness and consultant fees expended by the State in its pursuit of this action; and

6. Granting such other relief as the Board deems appropriate and just.

Respectfully submitted,

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

MATTHEW J. DUNN, Chief
Environmental Enforcement/
Asbestos Litigation Division


By: 
ROSEMARIE CAZEAU, Chief
Environmental Bureau North
Assistant Attorney General

Of Counsel:

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69 West Washington Street, Suite 1800
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(312) 814-2347 - fax

CERTIFICATE OF SERVICE

I, ZEMEHERET BEREKET-AB, an Assistant Attorney General, do certify that I caused to be served on this 28th day of July 2009, the foregoing Notice of Filing, and a Complaint, upon Mr. Donald R. Swinson, an individual, and Barbara J. Gorniak, Registered Agent of Champion Environmental Services, Inc., by placing same in an envelope bearing sufficient postage with the United States Postal Service located at 100 West Randolph Street, Chicago, Illinois.



ZEMEHERET BEREKET-AB