

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

PEOPLE OF THE STATE OF
ILLINOIS,

Complainant,

vs.

RAY F. LANDERS, individually, and
EQUIPPING THE SAINTS MINISTRY,
INTERNATIONAL, INC., an Illinois,
not-for-profit corporation,

Respondents.

PCB No. 07-13
(Enforcement)

RECEIVED
CLERK'S OFFICE
AUG 10 2010
STATE OF ILLINOIS
Pollution Control Board

NOTICE OF FILING

To: Edmond H. Rees
Attorney at Law
128 S. Broad St.
P.O. Box 566
Carlinville, IL 62626

PLEASE TAKE NOTICE that on this date I mailed for filing with the Clerk of the Pollution Control Board of the State of Illinois, a MOTION FOR SUMMARY JUDGMENT and MEMORANDUM OF JUDGMENT, copies of which are attached hereto and herewith served upon you.

Respectfully submitted,

PEOPLE OF THE STATE OF ILLINOIS

LISA MADIGAN,
Attorney General of the
State of Illinois

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

BY: _____

J. L. HOMAN
Assistant Attorney General
Environmental Bureau

500 South Second Street
Springfield, Illinois 62706
217/782-9031
Dated: August 6, 2010

CERTIFICATE OF SERVICE

I hereby certify that I did on August 6, 2010, send by U.S. mail, with postage thereon fully prepaid, by depositing in a United States Post Office Box a true and correct copy of the following instruments entitled NOTICE OF FILING and MOTION FOR SUMMARY JUDGMENT

To: Edmond H. Rees
Attorney at Law
128 S. Broad St.
P.O. Box 566
Carlinville, IL 62626

and the original and ten copies by First Class Mail with postage thereon fully prepaid of the same foregoing instrument(s):

To: John T. Therriault, Assistant Clerk
Illinois Pollution Control Board
James R. Thompson Center
Suite 11-500
100 West Randolph
Chicago, Illinois 60601

A copy was also sent by First Class Mail with postage thereon fully prepaid

To: Carol Webb
Hearing Officer
Illinois Pollution Control Board
1021 North Grand Avenue East
Springfield, IL 62794



J. L. HOMAN
Assistant Attorney General

This filing is submitted on recycled paper.

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

PEOPLE OF THE STATE OF ILLINOIS,)
)
Complainant,)
)
vs.)
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)
RAY F. LANDERS, individually, and)
EQUIPPING THE SAINTS MINISTRY)
INTERNATIONAL, INC.,)
)
Respondents.)

No. 07-13
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AUG 10 2010
STATE OF ILLINOIS
Pollution Control Board

MOTION FOR SUMMARY JUDGMENT

Complainant, PEOPLE OF THE STATE OF ILLINOIS, by Lisa Madigan, Attorney General of the State of Illinois, pursuant to Section 101.516 of the Illinois Pollution Control Board ("Board") Procedural Rules, 35 Ill. Adm. Code 101.516, hereby moves this Board for Summary Judgment against the Respondents, RAY F. LANDERS and EQUIPPING THE SAINTS MINISTRY INTERNATIONAL, INC. In support of this Motion, Complainant states as follows:

1. The Complaint was filed on August 24, 2006, alleging NESHAP notification violations against Equipping the Saints Ministry International, Inc., and Ray F. Landers. Specifically, the Complaint alleges that the Respondents initiated and conducted a renovation/demolition at the site without first filing the necessary NESHAP notification with the Illinois EPA.
2. On February 8, 2008, Complainant served Requests for Admission of Facts and Genuineness of Documents on the Respondents.
3. On April 22, 2008, the Respondents filed their Response to the Request for Admission of Fact and Genuineness of Documents.

4. The Complaint, along with other filings in this matter, specifically the Response to Request for Admission of Fact and Genuineness of Documents, and the Motion and Memorandum of Law and Argument in Support of the Motion for Summary Judgment and attachments, establish all material facts necessary to prove liability on the Complaint.

Accordingly, because there is no genuine issue of material fact, the Complainant is entitled to judgment as a matter of law.

5. Section 101.516(b) of the Board's Procedural Regulations, 35 Ill. Adm. Code 101.516(b) provides as follows:

- b) If the record, including pleadings, depositions and admissions on file, together with any affidavits, shows that there is no genuine issue of material fact, and that the moving party is entitled to judgment as a matter of law, the Board will enter summary judgment.

6. In the Response to Request for Admission of Facts and for Genuineness of Documents, the Respondents admit (1) Equipping the Saints Ministry International, Inc., owned the building in question at the time of the violations, (2) that the Respondents activities at the site included removal of concrete blocks from the south and west exterior walls of the building and installation of post jacks to support the roof, and that (3) neither Equipping the Saints Ministry International, Inc., nor Ray Landers filed a written NESHAP notification and attendant fee prior to removal of the concrete blocks. Please see answers to Request for Admission No. 5, 7, 8, 9, 11, 12, 13, 14, 15, and 16.

7. Along with this Motion, Complainant has filed affidavits from the inspectors who documented conditions at the site: Steven Youngblut, Alan Grimmatt, and David Jansen. Their inspection reports with photographs are also included with the affidavits. The photographs further document the conditions observed at this site, and are also admitted by the Respondents in the Request for Admission of Fact and for Genuineness of Documents. Taken


together, these admissions, affidavits, inspection reports and photographs, establish that there are no remaining issues of fact and the Complainant is entitled to summary judgment on the Complaint.

WHEREFORE, Complainant, People of the State of Illinois, respectfully request that the Board enter Summary Judgment in favor of the Complainant and a finding of liability against Respondent on the Complaint, and impose a civil penalty against the Respondents in this matter, along with such other relief as the Board deems appropriate.

Respectfully submitted,

PEOPLE OF THE STATE OF ILLINOIS
LISA MADIGAN
ATTORNEY GENERAL

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

BY: 
J. Homan
Environmental Bureau
Assistant Attorney General

500 South Second Street
Springfield, Illinois 62706
217/782-7968
Dated: August 4, 2010

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

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

Complainant,

-vs-

**RAY F. LANDERS, individually, and EQUIPPING)
THE SAINTS MINISTRY, INTERNATIONAL, INC.,)**

Respondents.

No. 07-13

**MEMORANDUM OF LAW AND ARGUMENT IN SUPPORT OF
COMPLAINANT'S MOTION FOR SUMMARY JUDGMENT**

Now comes Complainant, PEOPLE OF THE STATE OF ILLINOIS, by LISA MADIGAN, Attorney General of the State of Illinois, by and through her assistant Javonna Homan, Assistant Attorney General, and respectfully submits this Memorandum of Law and Argument in Support of Complainant's Motion for Summary Judgment.

INTRODUCTION

A complaint was filed on August 24, 2006, for NESHAP notification violations against Equipping the Saints Ministry International, Inc., and Ray Landers. It is the Complainant's position that the Respondents did conduct a renovation/demolition at the site without first submitting the required notification to the Illinois Environmental Protection Agency in violation of the NESHAP notification provision. The condition of the site was documented in the Illinois EPA inspection reports and also in the affidavits attached to the Complainant's Motion for Summary Judgment.

STANDARD FOR SUMMARY JUDGMENT

Complainant recognizes that summary judgment is appropriate only when there is no genuine issue of material fact, Calvin v. Hobart Bros., 189 Ill. Dec. 807, 156 Ill. 2d 166, 620

N.E.2d 375 (1993). However, summary judgment is proper if pleadings, depositions and admissions on file, together with affidavits, show there is no genuine issue as to any material fact and that movant is entitled to summary judgment. Burton v. County of Jackson, 186 Ill. Dec. 472, 246 Ill. App. 3d 677, 616 N.E.2d 662 (5th Dist. 1993); N. Ill. Emergency Physicians v. Landau, Omahana & Kopka, Ltd., 216 Ill.2d 294, 305, 837 N.E.2d 99, 106 (2005). Summary judgment is proper when the matter before the trial court can be decided as a question of law. First of America Bank, Rockford, N.A. v. Netsch, 166 Ill.2d 165, 176, 651 N.E.2d 1105, 1110 (1995). The use of summary judgment is encouraged under Illinois law as an aid to the expeditious disposition of a lawsuit. Bolingbrook Equity I Ltd. Partnership v. Zayre of Ill., Inc., 252 Ill.App.3d 753, 764, 624 N.E.2d 1287 (1st Dist. 1993). Complainant believes that the instant motion for summary judgment, along with the pleadings and affidavits on file show that there is no genuine issue as to material fact and that Complainant is entitled to summary judgment as a matter of law.

FACTS

The pleadings, affidavits of Steven Youngblut, Alan Grimmer and David Jansen, and other attachments, including attached inspection reports, taken together show that there is no genuine issue as to material fact and that Complainant is entitled to summary judgment as a matter of law.

The Illinois Environmental Protection Agency ("IEPA") conducted an initial inspection on June 4, 2004. Respondents Ray Landers ("Landers") was the operator and Equipping the Saints Ministry International, Inc., was the nominal owner of the property with a building (formerly known as the Auburn bowling Alley) located at 1229 West Jackson Street, Auburn, Sangamon County, Illinois (the "facility" or "site"). The Respondents have owned the site since before January 20, 2005. During the June 4, 2004 inspection, inspectors encountered Mr. Ray

Landers at the site. Mr. Landers informed the inspectors at that time that he intended to renovate the building. The exterior walls of the building were intact during this inspection. Please see Exhibit 2, Affidavit of Alan Grimmatt, with attachments. On January 14, 2005, a follow-up inspection was conducted. The inspectors observed and documented a large hole in the exterior wall of the building, and the removal of some of the concrete blocks forming the exterior walls. On a date prior to January 14, 2005, the Respondents commenced demolition/renovation activities at the facility, including the removal of concrete blocks from the south and west exterior walls of the building. Please see Exhibit 3, Affidavit of David Jansen, with attachments. The site was inspected again on January 20, 2005. The south exterior wall and approximately one third of the west exterior wall had been removed and post jacks had been installed to prevent the remaining section of the roof from collapsing. Please see Exhibit 1, affidavit of Steve Youngblut, with attachments. Subsequent record review by the IEPA revealed that the Respondents had not submitted a NESHAP notification prior to commencing this renovation/demolition. Please see Exhibit 1, affidavit of Steve Youngblut, with attachments.

The owner and operator of a demolition activity are required by 40 CFR 61.145(b)(2) to provide notification of a demolition activity at least ten working days prior to commencing such activity to the IEPA. A subsequent record review by the Agency indicated that no notification was filed for this site. Please see Exhibit 1, Affidavit of Steve Youngblut, with attachments.

On April 22, 2008, the Respondents provided their responses to the Complainant's Request for Admission of Facts and for Genuineness of Documents. In those responses, the Respondents admit that (1) Equipping the Saints Ministry International, Inc., was the owner of the facility during the time of the violations (Please see Request for Admission of Facts and for Genuineness of Documents and answers ("Request"), #5), (2) that during the time period of the alleged violations, the Respondents' activities at the site included removal of concrete blocks

from the south and west exterior walls of the building and installation of post jacks to support the roof (Please see Request #7 and 8), and that (3) neither Ray Landers nor Equipping the Saints Ministry International, Inc., filed the written NESHAP notification and fee with the Illinois EPA. (Please see Request #9, 11, 12, 13, 14, 15 and 16).

Based on the foregoing pleadings, affidavits, inspection reports, and photos, Complainant believes that there is no longer any issue of material fact in dispute between the parties and that the Complainant is entitled to judgment as a matter of law.

APPLICABLE STATUTORY AND REGULATION PROVISIONS

Following are the provisions of the Act, 415 ILCS 5/1 *et seq.*, and the Illinois Pollution Control Board's Rules and Regulations, 35 Ill. Adm. Code, *et seq.*, in relevant part, which are applicable to this Complaint:

Section 9.1(d)(1) of the Act, 415 ILCS 5/9.1(d)(1) (2008) provides as follows:

No person shall:

(1) violate any provisions of Sections 111, 112, 165 or 173 of the Clean Air Act, as now or hereafter amended, or federal regulations adopted pursuant thereto;

40 CFR §61.145 provides in pertinent part as follows:

Standards for demolition and renovation.

(a) Applicability. To determine which requirements of paragraphs (a), (b), and (c) of this section apply to the owner or operator of a demolition or renovation activity and prior to the commencement of the demolition or renovation, thoroughly inspect the affected facility or part of the facility where the demolition or renovation operation will occur for the presence of asbestos, including Category I and Category II nonfriable ACM. The requirements of paragraphs (b) and (c) of this section apply to each owner or operator of a demolition or renovation activity, including the removal of RACM as follows:

* * *

(2) In a facility being demolished, only the notification requirements of paragraphs (b)(1), (2), (3)(I) and (iv), and (4)(I) through (vii) and (4)(ix) and (xvi) of this section apply, if the combined amount of RACM is

(I) Less than 80 linear meters (260 linear feet) on pipes and less than 15 square meters (160 square feet) on other facility components, and

(ii) Less than one cubic meter (35 cubic feet) off facility components where the length or area could not be measured previously or there is no asbestos.

*

*

*

(b) Notification requirements. Each owner or operator of a demolition or renovation activity to which this section applies shall:

(1) Provide the Administrator with written notice of intention to demolish or renovate. Delivery of the notice by U.S. Postal Service, commercial delivery service, or hand delivery is acceptable.

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*

*

40 CFR §61.141 provides the following pertinent definitions:

Demolition means the wrecking or taking out of any load-supporting structural member of a facility together with any related handling operations or the intentional burning of any facility.

*

*

*

Facility means any institutional, commercial, public, industrial, or residential structure, installation, or building (including any structure, installation, or building containing condominiums or individual dwelling units operated as a residential cooperative, but excluding residential buildings having four or fewer dwelling units); any ship; and any active or inactive waste disposal site....

*

*

*

Facility component means any part of a facility including equipment.

*

*

*

Owner or operator of a demolition or renovation activity means any person who owns, leases, operates, controls, or supervises the facility being demolished or renovated or any person who owns, leases, operates,

controls, or supervises the demolition or renovation operations, or both.

* * *

Renovation means altering a facility or one or more facility components in any way, including the stripping or removal of RACM from a facility component. Operations in which load-supporting structural members are wrecked or taken out are demolitions.

* * *

Structural member means any load-supporting member of a facility, such as beams and load-supporting walls; or any nonload-supporting member, such as ceilings and nonload-supporting walls.

ISSUE PRESENTED

Complainant believes that the facts established by the pleadings, affidavits and inspection reports which are attached to the Complainant's motion for summary judgment, pose one issue:

Was the removal of one and one third of the exterior walls of the building a demolition?

It is the position of the Complainant that the removal of the southern exterior wall and approximately one third of the western exterior wall commenced a demolition as that term is defined in 40 C.F.R. §61.141. Because a demolition had been initiated, the Respondents were required under 40 C.F.R. §61.145(b)(2), to provide to the Illinois EPA notification of a demolition activity at least 10 working days prior to commencing such activity. As such, the Complainant believes that there are no material facts at issue and the Complainant is entitled to judgment as a matter of law.

RELIEF SOUGHT

This cause of action seeks the following relief - imposition of a monetary penalty for violations of the relevant provisions of the Act, Federal regulations and Board regulations.

ARGUMENT

The provisions of the NESHAP are quite clear. The owner/operator of a demolition/renovation must file a notification with the Environmental Protection Agency not less than 10 days prior to commencing the demolition/renovation. Ray Landers and/or Equipping the Saints Ministry International, Inc., were the owner/operator of the site at issue in this matter. At some point prior to January 14, 2005, the Respondents or his/their contractors started removing sections of the exterior walls of the building, and installed post jacks to support the roof. The Respondents did not file a notification prior to removing those portions of the exterior walls. The Respondents did initiate a demolition at the site, under the definition provided in the regulations. The work was halted when the Respondents were informed of the violation. The Respondents were required to file a notification for this demolition.

The primary purpose of the Act is to "...assure that adverse effects upon the environment are fully considered and borne by those who cause them." National Marine, Inc. v. Illinois Environmental Protection Agency, 159 Ill.2d 381, 203 Ill.Dec. 251, 639 N.E.2d 571 (1994). The Act is to be liberally construed to effect its purposes. 415 ILCS 5/2(c)(West 1996)." Ryan v. McFalls, *supra*, at 226. It is certainly appropriate that the Respondents bear responsibility for the failure to file the required notification.

CONCLUSION

The material facts proving violations and liability in this case are not in dispute. Ray Landers and/or Equipping the Saints Ministry International, Inc., owned/operated the site during the activities in question. During the June 3, 2004, inspection, only very basic cleaning work appeared to be taking place in the building at the site. On January 14, 2005, during the follow-up inspection, inspectors observed and documented a large hole in the exterior wall of the building, and the removal of some of the concrete blocks forming the exterior walls. By January 20, 2005, the entire southern exterior wall had been removed as well as part of the western


exterior wall, and post jacks were in place to support the roof. A NESHAP notification was not filed prior to January 14, 2005. The facts outlined in this Motion leave no genuine issues of material fact. A civil penalty for this violation is proper. The People of the State of Illinois respectfully request that summary judgment be granted and an appropriate penalty assessed against the Respondent.

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:



J. Homan
Environmental Bureau
Assistant Attorney General

ARDC # 6244312
500 South Second Street
Springfield, Illinois 62706
217/782-9031
Dated: 6 August 2010

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.

RAY F. LANDERS, individually, and EQUIPPING
THE SAINTS MINISTRY, INTERNATIONAL, INC.,
an Illinois corporation,

Respondents.

NO. PCB 07-13

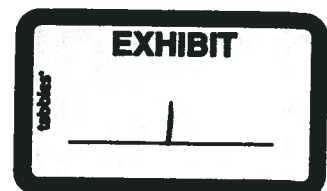
AFFIDAVIT OF STEVEN YOUNGBLUT

I, Steven Youngblut, being first duly sworn on oath, state and depose that the following statements set forth herein are true and correct, except as to matters herein stated on information and belief and as to such matters the undersigned certifies that he believes the same to be true:

1. I am presently employed by the Illinois Environmental Protection Agency ("Illinois EPA") in the Field Operations Section of the Bureau of Air as the acting section manager for the Bureau of Air (BOA), Field Operations Section (FOS). I have been employed by the Illinois EPA since August 16, 1978.

2. As a part of my duties, I was responsible for performing inspections to monitor and ensure compliance with the federal Clean Air Act, Illinois Environmental Protection Act, and regulations thereunder, including the National Emission Standards for Hazardous Air Pollutants ("NESHAP") for asbestos.

3. I received from Purdue University a bachelors degree in environmental engineering. I have a graduate engineering degree in thermal and environmental engineering from Southern Illinois University at Carbondale. I have personally been involved in conducting



over two thousand five hundred (2,500) inspections of various types, including at least two hundred fifty (250) inspections involving asbestos and asbestos related issues. I currently hold an asbestos inspector's license from the Illinois Department of Public Health. I have also been trained in accordance with the Asbestos Hazard Emergency Response Act ("AHERA"). Please see Attachment A.

4. I am familiar with the facts of the case the Illinois Attorney General's Office has filed involving Ray Landers and Equipping the Saints Ministry International, Inc., PCB-07-13.

5. Based upon my knowledge, experience, and training as an Illinois EPA BOA FOS inspector, asbestos is a known human carcinogen and poses a significant threat to human health and safety if improperly handled.

6. I am familiar with the facility formerly known as the Auburn Bowling Alley ("facility"), located at the intersection of State Routes 4 and 104 in Auburn, Sangamon County, Illinois, 1229 West Jackson Street, Auburn, Illinois.

7. On June 4, 2004, I conducted an inspection of the former Auburn Bowling Alley in response to an anonymous citizen complaint received by the Illinois EPA alleging improper renovation activities performed by Ray Landers within the facility. I was accompanied during the inspection by Illinois EPA Asbestos Unit inspector Alan Grimmatt. During the inspection I observed Mr. Ray Landers and his workers cleaning and painting the building. The exterior walls of the structure were intact on that date.

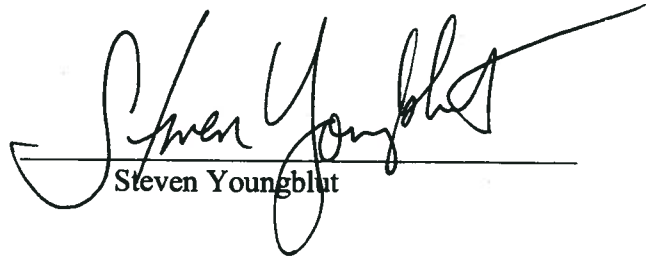
8. On January 20, 2005, I again conducted an inspection of the former Auburn Bowling Alley. The entire south wall and approximately one third of the west wall had been removed. Post jacks situated in a line running north to south were installed to prevent roof collapse. The concrete blocks that had been removed from the west wall were no longer on the

site. Please see Attachment B.

9. Upon information and belief, a notification of demolition and renovation specified by NESHAP for asbestos notification requirements was not received by the Illinois EPA prior to removal of the south and one third of the west wall.

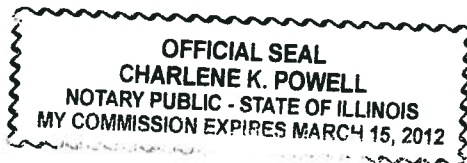
10. The removal of the south and one third of the west walls resulted in demolition activities as that term is defined by the NESHAP for asbestos.

FURTHER AFFIANT SAYETH NOT.


Steven Youngblut

Subscribed and sworn before me
this 3rd day of August, 2010.


NOTARY PUBLIC



STEVEN S. YOUNGBLUT

Illinois Environmental Protection Agency
Bureau of Air - Division of Air Pollution Control
Field Operations Section - Springfield Region
1021 North Grand Avenue East
P. O. Box 19276
Springfield, Illinois 62794-9276
217-557-8675

PROFESSIONAL EMPLOYMENT

Acting Section Manager
Acting Regional Manager
Unit Supervisor/District Engineer
District Engineer

8/09 to present;
2/07-7/09
3/93 to 2/07
8/78 to 2/07

Duties and Responsibilities

Acting Section Manager

- Responsible for the daily operations of the Bureau of Air Field Operations Section.
- Supervise a staff of 3 Regional Managers, 5 Unit Supervisors and 30 Field Inspectors.

Acting Regional Manager

- Supervise a staff of 2 Unit Supervisors and 5 Field Inspectors.

Unit Supervisor/District Engineer

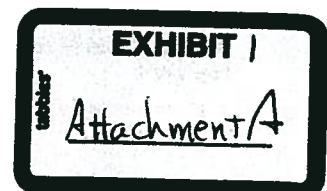
- Supervise a staff of 2 inspectors in their inspections of air pollution facilities in 15 counties in Central Illinois.
- Determine if the air pollution facilities are in compliance with State and Federal laws, rules and regulations, State permits, and Illinois Pollution Control Board or Court Orders.
- Develop compliance, and enforcement strategies for above facilities through voluntary means, and/or referrals to the Illinois Attorney General's Office, local State's Attorneys, and the USEPA, and testify as an expert or material witness at trials and hearings.
- Review for quality and completeness the inspection reports of Springfield Region Bureau of Air staff, and provide assistance and advice to other Illinois EPA Bureaus and Regions, to other State, Federal, and local Agencies, and to the public, regulated community, and consultants.
- Oversee training, and development of Bureau of Air/Field Operations Section Region staff and assist the Peoria Regional Manager in the training and development of other Region staff
- Explain BOA/FOS programs at public meetings, conferences, and seminars.

Acting Peoria Regional Manager

1/03 to 12/04

Duties and Responsibilities

- Supervised the Bureau of Air Peoria Regional Office Operations that employed approximately 5 inspectors along with two other acting managers.



Duties and Responsibilities

- Conducted field inspections of air pollution facilities in 15 county Central Region to determine their compliance status, participated in enforcement activities, collected samples, and wrote reports documenting inspection findings.
- Conduct inspections of asbestos renovation/demolition projects in Springfield and Peoria Regions and determine compliance with the federal NESHAP regulations for asbestos.
- Acted as BOA/FOS Peoria Regional Manager in his absence.

PROFESSIONAL CERTIFICATIONS

Professional Engineer in Training License No. 061-017140

Illinois Department of Public Health Asbestos Inspector License No. 100-10475

PROFESSIONAL AFFILIATIONS

Air & Waste Management Association, Central Illinois Chapter

DIRECTOR

10/95-10/99

TREASURER

1/02 to present

PROFESSIONAL TRAINING

1990 through 2010

- Illinois Environmental Protection Agency's Office of Chemical Safety's annual OSHA hazardous waste worker supervisory level and refresher safety training.

1978 through 2009

- Completed semi-annual Evaluation of Visible Emissions Training School certification.

1990 through 2010

- Completed annual asbestos inspector refresher training.

April 2005

- Illinois Environmental Protection Agency's Landfill Gas Management Seminar

October 2004

- United States Environmental Protection Agency's Continuous Monitoring Workshop.

April 2002

- Paints & Coatings Workshop-Ron Joseph & Associates, Joliet, IL

February 2002

- Completed the OSHA 40 hour Hazardous Waste certification training.

December 2001

- Paints & Coatings Application Workshop at The Iowa Waste Reduction Center.

January 2001

- United States Environmental Protection Agency's course on Stack Testing Emission Sources.

January 2000

- United States Environmental Protection Agency's course on Inspection and testing for Fugitive VOC and HAP leaks.

April 1999

- United States Environmental Protection Agency's workshop on Risk Management Programs Section 112R.

October 1989

- Purdue University Industrial Fuels Conference.

May 1987

- United States Environmental Protection Agency's course Source Sampling for Particulate Pollutants.

July 1986

- United States Environmental Protection Agency's course Combustion Evaluation.

October 1983

- Purdue University Industrial Fuels Conference

May 1983

- United States Environmental Protection Agency's course on Advanced Inspection Techniques for Air Pollution Control Equipment.

May 1983

- United States Environmental Protection Agency's Vinyl Chloride Seminar on complying with the NESHAP regulations.

March 1983

- United States Environmental Protection Agency's VOC Inspection Workshop.

February 1983

- United States Environmental Protection Agency's Flue Gas Desulfurization Technology Transfer Workshop.

August 1982

- Illinois Department of Law Enforcement's "Criminal Proceedings" seminar.

March 1980

- United States Environmental Protection Agency's course on Control of Particulate Emissions.

October 1979

- United States Environmental Protection Agency's course on the Control of Gaseous Emissions.

EDUCATION

- B.S.E in Engineering majoring in Environmental Engineering, Purdue University, West Lafayette, Indiana, graduated in May 1976.
- M.S. in Thermal & Environmental Engineering, Southern Illinois University, Carbondale, Illinois, graduated in June 1983.

Tier I Inspection Memorandum

Date: January 31, 2005
To: E. Bakowski
From: S. Youngblut

Date of Inspection: January 20, 2005
Last Insp. Date: June 4, 2004
I.D.#: 167005 **R/D:** 204
County: Sangamon

Source: Equipping the Saints Ministry, International, Inc./former Auburn Bowling Alley
Address: 1229 West Jackson St., Auburn, IL 62615
Contact/Title: Ms. Billie Landers/ Agent
Phone: 217/438-3202

Purpose: Follow-up investigation

Findings:

On this date I drove to the building located east of the intersection of State routes 4 and 104 on the west side of Auburn. The building formerly housed an antique store and before that it was a bowling alley. The building is typically referred to as "the old bowling alley". My last visit to the building was on June 4, 2004 with Al Grimmert. During that visit Ray Landers and his workers were busy cleaning, painting and renovating the building. All exterior walls were intact and we explained the requirement for the asbestos renov/demo notification prior to removing any load bearing walls. We did not observe any physical evidence that asbestos containing material had been removed.

Upon arrival on 1/20/05 no one was at the site. I noticed that the entire south wall and approximate one-third of the west wall had been removed. Post jacks situated in a line running north to south were installed to prevent the roof from collapsing. A Waste Management roll-off box containing furniture, a metal door with frame and some discarded household trash was staged immediately southwest of the building. I walked around the building and took the attached photographs. The building was empty with the exception of some tools and furniture. It appeared that some repair work had been performed on the bow-string trusses that held the roof up. I did not observe the presence of any suspect ACM laying around the inside of the building. There existed a few pieces of sandstone piled on the ground in front of the building. This was all that remained from the removal of the south wall of the building. The concrete blocks removed from the west wall were not onsite or in the roll-off box.

EXHIBIT 1

tabbies
Attachment B

On January 26, 2005 I met Ray Landers while visiting the car wash renovation also located in Auburn. Mr. Landers explained that they decided to renovate the old bowling alley into a Subway sandwich shop and fitness center. He said that they removed the walls in order to install windows. He said that he had gone to the Auburn Village Board with his plans and no one said anything about notifying EPA. I explained that the asbestos NESHAP regulations define the removal of a load-bearing wall in a commercial building as demolition requiring the filing of a notice. I explained that he would likely receive a violation letter from the Agency for no inspection, no notice and no fee paid.

All correspondence for this source should be mailed to:

Equipping the Saints Ministry, International, Inc.
500 Dickey John Road
Auburn, IL 62615
Attn: Ms. Billie Landers/ Agent

Violations: Yes X No ____ VNL Sent: Yes X No ____
Tier II Inspection Scheduled: Yes ____ No X

SSY(F:\SSY Reports\Reports\ E.T. Saints inspection 01-20-05.doc)

cc: DAPC/FOS - Springfield Regional Office
BOL/FOS- Springfield Regional Office
Ed Bakowski-I.D. File
S. Youngblut

VIOLATIONS

1. Section 9.1(d) of the Act 40 CFR 61.145(a): Equipping the Saints Ministry, International, Inc. failed to conduct a thorough inspection of the former Auburn Bowling Alley for the presence and location of asbestos prior to commencing demolition activities.
2. Section 9.1(d) of the Act and 40 CFR 61.145 (b) and Section 9.13(b) of the Act: Equipping the Saints Ministry, International, Inc., as the owner of a demolition activity, failed to submit an original notification of demolition prior to the commencement of such activities and to tender the requisite asbestos notification fee.

RECOMMENDATIONS

1. Immediately submit an original complete notification of demolition and renovation to the Illinois EPA.
2. Immediately submit to the Illinois EPA, by certified check or money order payable to "Treasurer, State of Illinois", a fee payment in the amount of \$300.00. Per Section 9.13(b) of the Act, the fee for commencing a demolition or renovation without submitting a notification and the requisite asbestos notification fee is \$300.00 or double the usual \$150.00 asbestos notification fee.

Note: The payment of the above amount is separate and apart from any enforcement action and penalties that may result from the failure to submit a notification pursuant to the asbestos NESHAP.

3. Prior to future demolition and renovation activities:
 - Submit to the Illinois EPA a properly completed written notice of demolition and renovation at least ten (10) working days prior to the demolition or renovation of the facility.
 - Ensure that each facility is inspected for asbestos containing material. If the facility is found to have asbestos containing material, comply with all the requirements of the NESHAP regulations.
4. Within 45 days of receipt of this Violation Notice, provide to the Illinois EPA a written statement containing a detailed summary of all demolition or activities you performed at the site including the identity of each worker utilized to conduct such activities, the locations of any asbestos-containing waste material and asbestos

contamination contained within the facility, and all dump manifests documenting the location utilized to dispose of all demolition debris.

5. Provide a written statement ensuring all demolition and renovation activities will be performed, in the future, in compliance with the National Emission Standards for Hazardous Air Pollutants, 40 CFR 61, Subpart M – National Emission Standards for Asbestos.



DIGITAL PHOTOGRAPHS



Date: 12/10/04
Time: 9:59 am
Direction: NE
Photo by: D.C. Jansen
Exposure No:007
Comments: south side of
building facing Route 104



Date: 01/20/2005
Time: 3:33 pm
Direction: NE
Photo by: S.S. Youngblut
Exposure No:001
Comments: same view of
building taken at a later
date.



DIGITAL PHOTOGRAPHS



Date: 01/20/2005
Time: 3:34 pm
Direction: NW
Photo by: S.S. Youngblut
Exposure No:003
Comments: view of
building from Route 104.



Date: 01/20/2005
Time: 3:35 pm
Direction: SE
Photo by: S.S. Youngblut
Exposure No:007
Comments: view of
building from the west side.



DIGITAL PHOTOGRAPHS



Date: 1/20/2005
Time: 3:34pm
Direction: SW
Photo by: S.S. Youngblut
Exposure No: 004
Comments: view of
building from the northeast
corner.



Date: 1/20/2005
Time: 3:34 pm
Direction: SW
Photo by: S.S. Youngblut
Exposure No: 005
Comments: view of north
side of building



DIGITAL PHOTOGRAPHS



Date: 1/20/2005
Time: 3:35pm
Direction: SE
Photo by: S.S. Youngblut
Exposure No: 006
Comments: view of west
side of building

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.

**RAY F. LANDERS, individually, and EQUIPPING)
THE SAINTS MINISTRY, INTERNATIONAL, INC.,)
an Illinois corporation,)**

Respondents.)

NO. PCB 07-13

AFFIDAVIT OF ALAN GRIMMETT

I, Alan Grimmett, being first duly sworn on oath, state and depose that the following statements set forth herein are true and correct, except as to matters herein stated on information and belief and as to such matters the undersigned certifies that he believes the same to be true:

1. I am presently employed by the Illinois Environmental Protection Agency ("Illinois EPA"), as a field inspector in the Asbestos Unit of the Bureau of Air Field Operations Section ("FOS"), located at 1021 North Grand Avenue East, Springfield, Illinois. I have been employed by the Illinois EPA in the present position since December 1998.

2. As part of my duties, I was responsible for performing inspections to monitor and ensure compliance with the federal Clean Air Act, Illinois Environmental Protection Act and regulations thereunder, including the National Emission Standards for Hazardous Air Pollutants ("NESHAP") for asbestos.

3. I am an accredited Asbestos Superintendent, Asbestos Worker, Asbestos Building Inspector, Asbestos Project Manager, Air Sampling Professional, and ASHARA Compliance Inspector. I also possess numerous hours of Illinois EPA technical training



including: Health & Safety, Air Sampling, Microvacuum Sampling, Project Designer, Project Management Planner, HAZMAT and Chemical Safety.

4. I am familiar with the facts of the case the Illinois Attorney General's Office has filed involving Ray Landers and Equipping the Saints Ministry International, Inc., PCB-07-13.

5. I am familiar with the facility formerly known as the Auburn Bowling Alley ("facility") located at the intersection of State Routes 4 and 104 in Auburn, Sangamon County, Illinois, 1229 West Jackson Street, Auburn, Illinois.

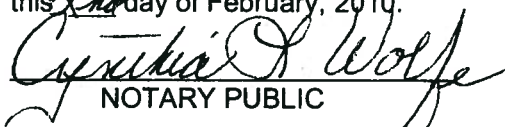
6. On June 4, 2004, I was a part of an inspection at the facility, 1229 West Jackson Street, Auburn, Sangamon county, Illinois. I was accompanied during the inspection by Steven Youngblut, Illinois EPA BOA Field Operations Section Acting Manager. During the inspection I observed Mr. Ray Landers and his workers cleaning and painting the building. The exterior walls of the structure were intact on that date. Please see Attachment A.

FURTHER AFFIANT SAYETH NOT


ALAN GRIMMETT

Subscribed and sworn to before me

this 2nd day of February, 2010.


NOTARY PUBLIC



Memorandum

Date: July 22, 2004

To: Mr. Ed Bakowski

From: Alan Grimmett

Inspection Date: June 4, 2004

Last Inspection Date: None

Re: Renovation

Facility Owner: Equipping the Saints Ministry, International Inc

Address: 5000 Dickey John Rd

City: Auburn, IL 62615

Contact/Title: Billie Landers, Agent

Facility: Former Auburn Bowling Alley

Address: State Route 104

City: Auburn, IL

Contact/Title: Billie Landers, Agent

Contractor: Equipping the Saints Ministry, International Inc

Address: 5000 Dickey John Rd

City: Auburn, IL 62615

Contact/Title: Billie Landers, Agent

Findings

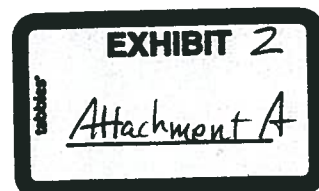
An investigation was conducted at the former Auburn Bowling Alley in Auburn Illinois on, June 4, 2004.

The investigation was conducted to assess compliance with the asbestos NESHAP and ASHARA regulations (pursuant to a complaint received by the Agency).

According to the complainant, the owner of the facility, Billie Landers was renovating the former bowling alley for a ministry that she and her husband Ray was involved with. Since I was familiar with Mr. and Mrs. Landers, I elected to contact BOA Regional Supervisor Steve Youngblut to accompany me on the inspection as to eliminate any possible conflict of interest that may be alleged.

I telephoned and requested Supervisor Youngblut accompanied me to the site. Supervisor Youngblut agreed to accompany me to the site.

Upon arrival at the facility at approximately 10:00am, I met Supervisor Youngblut in the parking lot of the facility.



Supervisor Youngblut and I exited the Agency vehicles and began walking around the exterior of the facility. As we walked around the facility it appeared work was occurring inside the facility. As I observed inside the facility I observed paint cans, ladders and fresh paint on the facilities interior portion of the roof deck.

At this time a person I recognized as Ray Landers approached us and asked if he could help us. Supervisor Youngblut and I displayed our credentials and Mr. Landers recognized Supervisor Youngblut but did not immediately recognize me. Once I refreshed Mr. Landers' memory, Mr. Landers then recognized me.

I asked Mr. Landers if he was renovating the facility. Mr. Landers stated it was his intent to renovate the facility once the facility had been cleaned and all of the trash had been hauled away.

I asked Mr. Landers what he had removed from the facility and Mr. Landers stated he had not removed anything from the facility except debris that had fallen from the ceiling and old antiques that had been left from the previous owner.

I returned to the Agency vehicle and acquired a copy of the Notification of Demolition and Renovation along with a copy of the asbestos NESHAP regulations.

I explained the notification procedure to Mr. Landers as they pertain to demolitions and renovations. I explained 40 CFR 61.141, "*Definitions*", 61.145, "*Standard for Demolition and renovation*" and 61.150, "*Standard for Waste Disposal for Manufacturing, Fabricating, Demolition, Renovation and Spraying Operations*".

Upon explaining the asbestos NESHAP to Mr. Landers we talked about a former nursing home in Virden Illinois that the Ministry was intending to renovate. Mr. Landers displayed an architectural drawing of the Virden facility and once again I explained the importance of the asbestos inspection requirements and notification requirements I had previously explained.

At the conclusion of our discussions regarding the asbestos NESHAP requirements, Supervisor Youngblut, Mr. Landers and myself walked through the facility answering questions from Mr. Landers regarding the renovation of the former bowling alley.

At the completion of our conversations, Supervisor Youngblut and I left the facility and approximately 12:00pm.

No suspect material was observed at this time. No violations were observed during this inspection.

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.

RAY F. LANDERS, individually, and EQUIPPING)
THE SAINTS MINISTRY, INTERNATIONAL, INC.,)
an Illinois corporation,)

Respondents.)

NO. PCB 07-13

AFFIDAVIT OF DAVID JANSEN

I, David C. Jansen, being first duly sworn upon oath, depose and state as follows:

1. I, DAVID C. JANSEN, am employed by the Illinois Environmental Protection Agency ("Illinois EPA"), as the Springfield Region Manager in the Field Operations Section of the Bureau of Land. I have been employed by the Illinois EPA since February 1980.

2. As part of my duties in the Bureau of Land, I am responsible for serving both as a field inspector and for overseeing the work of the Springfield Region Bureau of Land field inspectors. I supervise a staff of seven inspectors in their inspections of hazardous and non-hazardous waste facilities in a 17 county area in West Central Illinois. I direct civil and criminal investigation of hazardous and non-hazardous waste generators, treatment, storage and disposal facilities, sanitary landfills, open dumps, waste transporters, waste transfer stations, compost facilities, used tire handlers, and citizen complaints. I determine if the above facilities are in compliance with State and Federal laws, rules and regulations, State permits and Court or Illinois Pollution Control Board Orders governing the handling of hazardous and non-hazardous wastes. I develop compliance, remediation and enforcement strategies for the above facilities. I further review for quality and completeness the inspection reports of Region staff and the reports of solid waste inspection staffs of Sangamon, Christian, and Montgomery Counties, and

EXHIBIT

tabular

3

provide assistance and advice to other Agency Bureaus and Regions, to other State, Federal, and local Agencies, and to the public, regulated community, and consultants.

3. I have a bachelors of science degree in biology, botany major from Western Illinois University. I have further taken two years of graduate study in biology from Western Illinois University. My qualifications also include the following: I have personally been involved in conducting over 1000 inspections of various types, including at least 800 solid waste inspections. I have trained numerous Bureau of Land Field Operations Section and County inspectors to inspect open dumps, and have testified on numerous occasions regarding the violations of the Act pertaining to open dumping. I have instructed at and attended various workshops and seminars pertaining to open dumping. These seminars include a September 1996, Illinois Environmental Crimes Investigators Network's seminar on "Basic Awareness of Environmental Crime for Local Law Enforcement" and a February 1998, Illinois Environmental Crimes Investigators Network's seminar on "Investigation of Environmental Crime for Local Law Enforcement."

4. I am familiar with the Illinois Attorney General's case involving and the allegations against Ray Landers and Equipping the Saints Ministry International, Inc., PCB 07-13. In support of the People's Motion for Summary Judgment, I provide the following factual statements, personal observations, and opinions and conclusions based upon my experience and expertise.

5. On December 10, 2004, I conducted an inspection at 1229 West Jackson Street, Auburn, Sangamon County, Illinois. This property was formerly used as a bowling alley and was also known as the Antique Junction. Upon arrival at the site, I noticed that a large hole had been knocked in the middle of the outer and inner east facing exterior walls of the building. Rain was leaking through the roof. The door and a large window at the north end of the building were open.

6. On December 30, 2004, I conducted a re-inspection of the site. The condition of the building had not changed.

7. On January 14, 2005, I conducted a reinspection of the site. The exterior walls on the south and south west end of the building had been removed. The concrete blocks which had formed those walls were not on the site. Please see Attachment A.

8. I attest that photographs # 001 through # 008, # 001 through 003, and # 001 through 002 submitted with this affidavit truly and accurately depict the conditions that I observed at the time of the photographs on December 10 and 30, 2004, and January 14, 2005, respectively, that I have described regarding this incident.

FURTHER AFFIANT SAYETH NOT



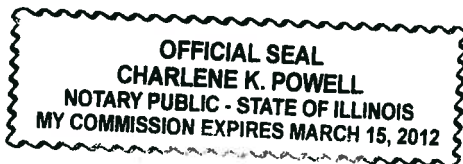
DAVID C. JANSEN

Subscribed and sworn to before me

this 2nd day of July, 2010.



NOTARY PUBLIC



**ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
MEMORANDUM**

DATE: January 18, 2005
TO: DLPC/Division File
FROM: David C. Jansen, DLPC/FOS-Springfield Region
SUBJECT: LPC #1670055027 – Sangamon County
Auburn/Equipping the Saints Ministry, International, Inc.
FOS File

On December 10, 2004 I went to the above referenced site located at 1229 W. Jackson in Auburn to check on its status. I had received information that on the property there was a roll-off box full of waste that may also contain asbestos contaminated waste generated from the demolition and renovation of the interior of the building located there.

On December 9, 2004 I had talked with Marty Sommer of Waste Management of Springfield, which owns the 30 cubic yard capacity roll-off box at the site. Mr. Sommer told me that his company wanted their roll-off box (# 30-28) back, because it had been there since June 2004. He said that Ray Landers had failed to pay the bill for transporting the wastes in the box to an Illinois EPA permitted landfill or transfer station. Mr. Landers is the husband of Billie Landers, who is the Registered Agent of Equipping the Saints Ministry, International, Inc., which owns the property. Mr. Sommer said Waste Management did not want to haul the wastes away for proper disposal without getting paid, and did not want to have to empty the wastes in the roll-off box on the ground so they could retrieve their box. He said Waste Management did not want to empty the wastes in the box on the ground (which would create an open dump and an unsightly public nuisance), and they did not know if the wastes in the box contained any asbestos contaminated debris. He said the box was currently overfilled such that some wastes would fall out when they tipped it up to load it onto their truck. He agreed to let the roll-off box sit there for the time being to avoid creating any environmental or regulatory problems either at the site or at the landfill. A transporter hauling, or a landfill receiving, regulated asbestos containing material needs to ensure its proper handling.

I arrived on-site at about 9:50 a.m., on December 10th, and no one was present. It was about 50°F, raining, and wet.

This site contains an old antique store, formerly known at the Antique Junction, that has undergone demolition and renovation of its interior, and is located immediately north of Route 104, east of the Routes 4 and 104 junction in Auburn (see attached aerial photo for location). Per the attached information I received through the Sangamon County Department of Public Health, the building, the lot it sits on, and the parcel immediately to the east are owned by Equipping the Saints Ministry, International, Inc. The parcel to the east of the building has the address of 1222 W. Jackson. Information about Equipping the Saints is included in the attached corporation report from the Illinois Secretary of State.

EXHIBIT 3

Attachment A

Upon arrival I noted that wastes were projecting above the top edge of the full Waste Management roll-off box (see attached photos # 001, 002 and 003). The wastes inside appeared to be general refuse, and general construction or demolition debris. There were some wooden doors and doorframes in fairly good condition at the very top of the wastes in the box. The doors and doorframes would probably slide off the top of the box when it is tilted up to remove it. There were some white plastic sacks, which appeared to contain garbage (i.e., food derived waste), on top of the box. The garbage appeared to have been generated from some place other than this property. I could not tell from an exterior examination of the debris I could see if any suspect asbestos containing waste was present inside the box.

West of the box, a large hole had been knocked in the middle of the outer and inner east-facing exterior walls of the building (see attached photos # 001 and 006). Upon entering the building, which was not posted, I noted several pieces of antique furniture, scaffolding, video games, fiberglass insulation, lumber, ductwork, and other materials (see attached photos # 004 and 005). Rain was leaking through the roof onto the concrete floor. The north end of the building was open (see attached photo # 007). I did not see any suspect asbestos containing materials inside the building in the brief amount of time I was there. Only a small remnant of what looked like vinyl floor covering was noted on the floor in the SE corner of the building (see attached photo # 008).

I left the site at about 10:05 a.m.

I returned to the site on December 30, 2004 at about 11:40 a.m. It was about 60 °F, partly sunny, and wet. No one representing the site owner was present. Upon arrival I saw that several large, black plastic sacks of trash, and several new empty toy boxes (which were probably generated from around the Christmas holiday the previous Saturday) had been added to the top of the roll-off box. The previously seen door frames and doors were no longer present on top of the roll-off box, and were probably scavenged, since they appeared to be in fairly good condition when I saw them on December 10th. There was an odor of sour garbage around the box.

I talked to Jim McClelland, who works at the business to the north of the Equipping the Saints' property, if he had seen Ray Landers recently. He said he had not. He complained about people dumping their waste in the Equipping the Saints roll-off box, and the wind scattering paper and plastic onto the McClelland property. He said when people see a roll-off box that appears unattended they dump their own waste into it, and said they locked up their dumpster to keep people from dumping in it after work hours. He said the Auburn City Council was not happy that the antique store was not boarded up.

I left the site at about 11:50 a.m.

A week or so later I reached Mr. Sommer and told him that I had been in contact with Dale Halford of the BOA/Asbestos Unit, who had informed me that their Unit was not aware of any asbestos having been in the building, and that it was OK for Waste

Management to haul away the wastes in the roll-off box as general refuse. I informed Mr. Sommer of that and asked him to let me know when the box was removed. He said he would have the box hauled away.

Although Mr. Sommer did not call me, I returned to the site on January 14, 2005, arriving at about 9:05 a.m. It was about 5 °F, sunny, and there was snow on the ground. The roll-off box full of waste previously seen on the east side of the building was gone, and a section of orange plastic fencing was strung loosely across the opening in the exterior wall nearby (see attached photo # 001). Because it was suspended in the air it served as no real physical barrier to trespassers.

I walked to the south end of the building and saw the same roll-off box (# 30-28) that I had seen previously (see photo # 002). It was now almost full of bulky wastes, including furniture and ductwork removed from the inside of the building. The concrete blocks from the south end and southwest side of the building had been removed. I could not determine where the blocks had been taken. I left the site at about 9:10 a.m.

No apparent violations were noted.

cc: DLPC/FOS - Springfield Region
DAPC/FOS - Springfield Region
SCDPH, Allen Alexander



DIGITAL PHOTOGRAPHS



Date: 12/10/04
Time: 9:54 a.m.
Direction: SW
Photo by: D. C. Jansen
Exposure #: 001
Comments: east side of building showing roll-off box, and hole knocked in wall



Date: 12/10/04
Time: 9:55 a.m.
Direction: NW
Photo by: D. C. Jansen
Exposure #: 002
Comments: roll-off box overfilled with waste located east of building

File Names: 1670055027~12102004-[Exp. #].jpg



DIGITAL PHOTOGRAPHS



Date: 12/10/04
Time: 9:55 a.m.
Direction: S
Photo by: D. C. Jansen
Exposure #: 003
Comments: roll-off box
overfilled with waste
located east of building



Date: 12/10/04
Time: 9:57 a.m.
Direction: S
Photo by: D. C. Jansen
Exposure #: 004
Comments: south half of
building interior

File Names: 1670055027~12102004-[Exp. #].jpg



DIGITAL PHOTOGRAPHS



Date: 12/10/04
Time: 9:57 a.m.
Direction: N
Photo by: D. C. Jansen
Exposure #: 005
Comments: north half of
building interior

FROM: LISA MADIGAN

Attorney General
500 South 2nd Street
Springfield, IL 62706

TO:



Date: 12/10/04
Time: 9:57 a.m.
Direction: W
Photo by: D. C. Jansen
Exposure #: 006
Comments: hole knocked
in east wall of building, and
fiberglass insulation on
ground

File Names: 1670055027~12102004-[Exp. #].jpg



DIGITAL PHOTOGRAPHS



Date: 12/10/04
Time: 9:59 a.m.
Direction: NE
Photo by: D. C. Jansen
Exposure #: 007
Comments: south side of
building facing Route 104



Date: 12/10/04
Time: 10:01 a.m.
Direction: S
Photo by: D. C. Jansen
Exposure #: 008
Comments: floor covering
remaining on concrete in
SE corner of building

1670055027~12102004.doc

File Names: 1670055027~12102004-[Exp. #].jpg



DIGITAL PHOTOGRAPHS



Date: 12/30/04
Time: 11:43 a.m.
Direction: SE
Photo by: D. C. Jansen
Exposure #: 001
Comments: roll-off box showing toy boxes and garbage sacks added to top of wastes



Date: 12/30/04
Time: 11:43 a.m.
Direction: N
Photo by: D. C. Jansen
Exposure #: 002
Comments: roll-off box showing toy boxes and garbage sacks added to top of wastes

File Names: 1670055027~12302004-[Exp. #].jpg



DIGITAL PHOTOGRAPHS



Date: 12/30/04
Time: 11:46 a.m.
Direction: SW
Photo by: D. C. Jansen
Exposure #: 003
Comments: roll-off box
showing garbage sacks
added to top of wastes

1670055027~12302004.doc

File Names: 1670055027~12302004-[Exp. #].jpg



DIGITAL PHOTOGRAPHS



Date: 1/14/05
Time: 9:05 – 9:10 a.m.
Direction: SW
Photo by: D. C. Jansen
Exposure #: 001
Comments: area east of building where roll-off box full of wastes was located on December 30, 2004; orange plastic fence strung across opening in wall



Date: 1/14/05
Time: 9:05 – 9:10 a.m.
Direction: NE
Photo by: D. C. Jansen
Exposure #: 002
Comments: roll-off box located south of building, and blocks missing from south and southwest walls of building

File Names: 1670055027~01142005-[Exp. #].jpg

