

Electronic Filing - Received, Clerk's Office, 06/08/2012
BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

CONGRESS DEVELOPMENT)	
COMPANY,)	
)	
Petitioner,)	
)	
)	PCB No. 11-90
v.)	PCB No. 12-12
)	PCB No. 12-55
)	PCB No. 12-56
)	(Permit Appeal-Land)
ILLINOIS ENVIRONMENTAL)	(Consolidated)
PROTECTION AGENCY)	
)	
Respondent.)	

NOTICE OF FILING

TO: Attached Service List

PLEASE TAKE NOTICE that on June 8, 2012, I filed with the Clerk of the Illinois Pollution Control Board, the Administrative Record for each appeal and Certificate of Service, a disc of each record is enclosed and served upon you.

Respectfully submitted,

ILLINOIS ENVIRONMENTAL
PROTECTION AGENCY

By: *Gerald T. Karr*
Gerald T. Karr
Senior Assistant Attorney General
Environmental Bureau
69 West Washington Street
Suite 1800
Chicago, Illinois 60602
(312) 814-3369

DATED: June 8, 2012

THIS FILING IS SUBMITTED ON RECYCLED PAPER

SERVICE LIST

Russell R. Eggert
Andrew L. Schulkin
Lathrop & Gage, LLP
100 N. Riverside Plaza
Suite 2100
Chicago, Illinois 60606

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

CERTIFICATE OF SERVICE

I, GERALD T. KARR, an Assistant Attorney General in this case, do certify that on this 8th day of June, 2012, I caused to be served by First Class Mail the foregoing Notice of Filing and Administrative Record upon the individuals listed on the attached service list, by depositing the same in the U.S. Mail depository located at 100 West Randolph Street, Chicago, Illinois in an envelope with sufficient postage prepaid.


GERALD T. KARR

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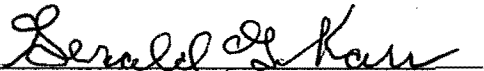
NOTICE OF FILING

TO: Attached Service List

PLEASE TAKE NOTICE that on June 8, 2012, I filed with the Clerk of the Illinois Pollution Control Board, Respondent's Motion for Leave to File a Reduced Number of Copies of the Administrative Record for each appeal and Certificate of Service, a copy of which is attached and served upon you.

Respectfully submitted,

ILLINOIS ENVIRONMENTAL
 PROTECTION AGENCY

By: 
 Gerald T. Karr
 Senior Assistant Attorney General
 Environmental Bureau
 69 West Washington Street
 Suite 1800
 Chicago, Illinois 60602
 (312) 814-3369

DATED: June 8, 2012

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MOTION FOR LEAVE TO FILE REDUCED NUMBER OF COPIES OF
RECORD

NOW COMES, Respondent, ILLINOIS ENVIRONMENTAL PROTECTION AGENCY, ex rel Lisa Madigan, Attorney General of the State of Illinois, and moves for leave to file a reduced number of copies of the record for the subject permit, and states as follows:

1. Section 101.302(h) of the Board's Procedural Rules, 35 Ill. Adm. Code 101.302 (h), states that the Illinois EPA is to file a signed original and 9 duplicate copies of the record.

2. The record in this matter consists of 4595 pages. Due to technology system constraints, electronic filing of the record is not possible. Duplication of the record would be both time consuming and a strain on State resources. For these reasons, plus the ability to include an electronic copy of the entire record on disc, Respondent requests the Board's consideration of a reduction in the number of hard copies required.

3. Communication with the Board Clerk's office indicated that the Board may be agreeable to accepting an original and a copy along with 7 CD discs, in lieu of the required original and nine hard copies. Further, additional hard copies can be provided if requested.

WHEREFORE, on the foregoing grounds and for the foregoing reasons, Respondent respectfully requests leave to file a reduced number of copies, that being an original, a copy and 7 CDs, of the record in this matter.

Respectfully submitted,

ILLINOIS ENVIRONMENTAL
PROTECTION AGENCY

By: 

Gerald T. Karr
Senior Assistant Attorney General
Environmental Bureau
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Chicago, Illinois 60602
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CERTIFICATE OF SERVICE

I, GERALD T. KARR, an Assistant Attorney General in this case, do certify that on this 8th day of June, 2012, I caused to be served by First Class Mail the foregoing Notice of Filing and Respondent's Motion for Leave to File a Reduced Number of Copies of the Administrative Record upon the individuals listed on the attached service list, by depositing the same in the U.S. Mail depository located at 100 West Randolph Street, Chicago, Illinois in an envelope with sufficient postage prepaid.


GERALD T. KARR