

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

RECEIVED
CLERK'S OFFICE

DEC 07 2012

STATE OF ILLINOIS
Pollution Control Board

AMERICAN DISPOSAL SERVICES OF
ILLINOIS, INC.,

Petitioner,

v.

COUNTY BOARD OF MCLEAN COUNTY,
ILLINOIS, HENSON DISPOSAL, INC., and
TKNTK, LLC

Respondents.

No. PCB 11-60

(Pollution Control Facility Siting
Application)

ORIGINAL
RETURN TO CLERK'S OFFICE

NOTICE OF FILING

TO: See Attached Proof of Service

PLEASE TAKE NOTICE that on December 7, 2012, we filed with the Illinois Pollution Control Board: (1) this Notice of Filing; (2) the attached Petitioner American Disposal Services of Illinois, Inc.'s Objection to Respondent McLean County's Interrogatory No. 8..

Dated: December 7, 2012

Respectfully submitted,

AMERICAN DISPOSAL SERVICES, INC.

By: 
One of its attorneys

Jennifer J. Sackett Pohlenz
Clark Hill, PLC
150 N. Michigan Avenue, Suite 2700
Chicago, Illinois 60601
Direct Dial: 312.985.5912
Fax: 312.985.5971
Email: jpohlenz@clarkhill.com

RECEIVED
CLERK'S OFFICE

DEC 07 2012

STATE OF ILLINOIS
Pollution Control Board

PROOF OF SERVICE

I Rita Burman, a non-attorney, swear or affirm that I served the document identified in the attached Notice of Filing on the following parties as identified below and when service is by depositing same in the U.S. mail, it was done from 150 N. Michigan Avenue, Suite 2700, Chicago, Illinois 60602, before 5:00 p.m. on this 7th day of December 2012.

Illinois Pollution Control Board James R. Thompson Center 100 W. Randolph Suite 11-500 Chicago, Illinois 60601 Hand Delivery	Hearing Officer Carol Webb Illinois Pollution Control Board 1021 North Grand Avenue East P.O. Box 19274 Springfield, Illinois 62794-9274 Via E-mail (webbc@ipcb.state.il.us)
Richard T. Marvel Attorney at Law 202 N. Center Street, Suite 2 Bloomington, IL 61701 Via E-mail (marvelr@me.com) & U.S. Mail Attorney for Respondents Henson Disposal, Inc. and TKNTK, LLC	Amy Jackson Rammelkamp Bradney, P.C. 232 West State Street Jacksonville, Illinois 62650 Via E-mail (ajackson@rblawyers.net) & U.S. Mail Co-Counsel for Respondents Henson Disposal, Inc. and TKNTK, LLC
Hanna Eisner McLean County State's Attorney's Office 104 W. Front Street, Rm. 605 Bloomington, IL 61702 Via E-mail (hannah.eisner@mcleancountyil.gov) & U.S. Mail	

Under penalties as provided by law pursuant to Illinois Rev. Stat. Chap. 110-, Sec. 1-109, I do certify that the statements set forth herein are true and correct.



Rita Burman

RECEIVED
CLERK'S OFFICE
DEC 07 2012
STATE OF ILLINOIS
Pollution Control Board

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

AMERICAN DISPOSAL SERVICES OF
ILLINOIS, INC.,

Petitioner,

v.

COUNTY BOARD OF MCLEAN COUNTY,
ILLINOIS, HENSON DISPOSAL, INC., and
TKNTK, LLC

Respondents.

No. PCB 11-60

(Pollution Control Facility Siting
Application)

**PETITIONER AMERICAN DISPOSAL SERVICES OF ILLINOIS OBJECTION TO
RESPONDENT MCLEAN COUNTY'S INTERROGATORY NO. 8**

NOW COMES, Petitioner, AMERICAN DISPOSAL SERVICES OF ILLINOIS, by and through its attorneys, Clark Hill PLC, and in objection to Respondent, MCLEAN COUNTY'S Interrogatory No. , states as follows: Please list the names and addresses of all persons (other than the person answering these Interrogatories or persons listed in previous answers) who have knowledge of the Henson Disposal, Inc. siting application, including but not limited to the pre-filing notices and hearings.

ANSWER: ADS objects to Interrogatory No. 8 as not relevant and overly broad. This Interrogatory asks for the identification of anyone who knew about Henson Disposal, Inc.'s application, at any time. Who knew or knows about Henson Disposal, Inc.'s siting application is simply not a topic of this appeal, not relevant to the statute at issue 415 ILCS 5/39.2, and is not calculated to lead to any relevant evidence. In fact, since the decision by the County Board of McLean County there has been several newspaper articles and since the filing of this Illinois Pollution Control Board ("PCB") case, there have been, thus far, 92 public comments submitted to the PCB.

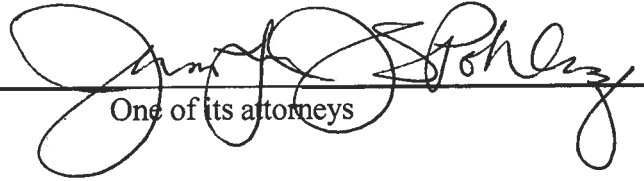
Dated: December 7, 2012

Respectfully submitted,

Clark Hill PLC
150 N. Michigan Ave., Suite 2700
Chicago, Illinois 60601
Phone: 312-985-5912

PETITIONER AMERICAN DISPOSAL SERVICES OF
ILLINOIS, INC.,

BY: _____

A handwritten signature in black ink, appearing to read "James P. Kelly", is written over a horizontal line. The signature is stylized and cursive.

One of its attorneys