

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

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OCT 3 2014

ADMINISTRATIVE CITATION

STATE OF ILLINOIS
Pollution Control Board

ILLINOIS ENVIRONMENTAL)
PROTECTION AGENCY,)
))
Complainant,)
))
v.)
))
KAREN YOUMANS,)
))
Respondent.)

AC 15-8
(IEPA No. 274-14-AC)

MOTION TO DISMISS
ADMINISTRATIVE CITATION

NOW COMES the Complainant, the Illinois Environmental Protection Agency ("Illinois EPA"), by and through its attorney, Michelle M. Ryan, pursuant to 35 Ill. Adm. Code 108.402, and respectfully states as follows:

- (1) On August 15, 2014, the Illinois EPA issued an Administrative Citation to Respondent Karen Youmans, based on an inspection conducted on July 11, 2014.
- (2) On September 23, 2014, the Administrative Citation was sent back to the Illinois EPA from the United States Postal Service, as unclaimed.
- (3) Because Karen Youmans was not timely served within 60 days as required by 415 ILCS 5/31.1(b), this Administrative Citation should be dismissed.

WHEREFORE, the Illinois Environmental Protection Agency requests that the Board dismiss the pending action against Karen Youmans.

ILLINOIS ENVIRONMENTAL
PROTECTION AGENCY,
Complainant,

DATED: September 30, 2014



Michelle M. Ryan
Assistant Counsel

Illinois Environmental Protection Agency
1021 North Grand Avenue East
P.O. Box 19276
Springfield, Illinois 62794-9276
(217) 782-5544

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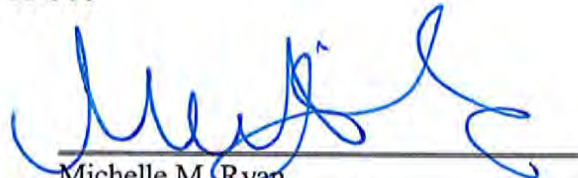
PROOF OF SERVICE

I hereby certify that I did on the 30th day of September 2014, 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 instrument(s) entitled MOTION TO DISMISS

To: Karen Youmans
17580E Terre Haute Road
Paris, IL 67994

and the original and nine (9) true and correct copies of the same foregoing instruments on the same date by U.S. Mail, with postage thereon fully prepaid

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


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Assistant Counsel

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