

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

PIASA MOTOR FUELS, INC.,)

Petitioner,)

v.)

ILLINOIS ENVIRONMENTAL)
PROTECTION AGENCY,)

Respondent.)

PCB 14-131
(UST Appeal)



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STATE OF ILLINOIS
Pollution Control Board

NOTICE

John T. Therriault
Clerk of the Board
Illinois Pollution Control Board
100 West Randolph Street, Suite 11-500
Chicago, Illinois 60601-3218

William D. Ingersoll
Brown, Hay & Stephens, LLP
205 S. Fifth Street, Suite 700
P.O. Box 2459
Springfield, IL 62705-2459

Carol Webb
Hearing Officer
Illinois Pollution Control Board
1021 North Grand Avenue East
P.O. Box 19274
Springfield, IL 62794-9274

PLEASE TAKE NOTICE that I have today caused to be filed a MOTION FOR LEAVE TO FILE ADMINISTRATIVE RECORD *INSTANTER* with the Illinois Pollution Control Board, a copy of which is served upon you.

Respectfully submitted,

ILLINOIS ENVIRONMENTAL
PROTECTION AGENCY,

Dated: August 19, 2014

Scott B. Sievers
Attorney Registration No. 6275924
1021 North Grand Avenue East
P.O. Box 19276
Springfield, Illinois 62794-9276
(217) 782-5544

Respondent,

BY:

Scott B. Sievers
Special Assistant Attorney General

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

PIASA MOTOR FUELS, INC.,)
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**MOTION FOR LEAVE TO FILE
ADMINISTRATIVE RECORD *INSTANTER***

NOW COMES the Respondent, ILLINOIS ENVIRONMENTAL PROTECTION AGENCY, by and through its attorney, Special Assistant Attorney General Scott B. Sievers, and for Respondent's Motion for Leave to File Administrative Record *Instanter* states the following:

1. On June 5, 2014, this honorable Board ordered the Respondent to "file the entire record of its determination by June 16, 2014, which is 30 days after the Board received Piasa's petition."

2. The undersigned did not receive both his written appointment as a Special Assistant Attorney General ("SAAG") from the Office of the Illinois Attorney General and a copy of the administrative record in a form ready for filing until after the June 16, 2014 date set forth by the Board. Until he received said appointment, the undersigned lacked lawful authority to sign and file documents with the Board on behalf of the Respondent.

3. The Respondent now respectfully requests leave to file *instanter* the administrative record, copies of which accompany this motion.

4. The undersigned has conferred with counsel for the Petitioner, and Petitioner's counsel has no objection to the instant motion.

WHEREFORE, the Respondent, ILLINOIS ENVIRONMENTAL PROTECTION AGENCY, prays that this honorable Board or the honorable Hearing Officer ALLOW the Respondent's MOTION FOR LEAVE TO FILE ADMINISTRATIVE RECORD *INSTANTER*.

Respectfully submitted,

ILLINOIS ENVIRONMENTAL
PROTECTION AGENCY,

Dated: August 19, 2014

Scott B. Sievers
Attorney Registration No. 6275924
1021 North Grand Avenue East
P.O. Box 19276
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(217) 782-5544

Respondent,

BY:



Scott B. Sievers
Special Assistant Attorney General

Piasa Motor Fuels, Inc. v. Illinois Environmental Protection Agency
Pollution Control Board No. 14-131

CERTIFICATE OF SERVICE

Scott B. Sievers, Special Assistant Attorney General, herein certifies that he has served a copy of the foregoing **MOTION FOR LEAVE TO FILE ADMINISTRATIVE RECORD**

INSTANTER upon:

John T. Therriault
Clerk of the Board
Illinois Pollution Control Board
100 West Randolph Street, Suite 11-500
Chicago, Illinois 60601-3218

William D. Ingersoll
Brown, Hay & Stephens, LLP
205 S. Fifth Street, Suite 700
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by mailing true copies thereof to the addresses referred to above in envelopes duly addressed bearing proper first class postage and deposited in the United States mail at Springfield, Illinois, on August 19, 2014.

Respectfully submitted,


ILLINOIS ENVIRONMENTAL
PROTECTION AGENCY,

Respondent,

Dated: August 19, 2014

Scott B. Sievers
Attorney Registration No. 6275924
1021 North Grand Avenue East
P.O. Box 19276
Springfield, Illinois 62794-9276
(217) 782-5544

BY: _____


Scott B. Sievers
Special Assistant Attorney General

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Pollution Control Board

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