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**Jeep & Blazer, L.L.C.**  
**environmental law**

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October 23, 2007

**DELIVERY VIA REGISTERED MAIL, RETURN RECEIPT REQUESTED**

**To:**

Mercury Vapor Processing  
Technologies, Inc.  
c/o Lindsay Sammon  
Registered Agent  
6400 Chestnut St.  
Morton Grove, IL 60053

Molidor Venture Capital, LLC  
c/o James Molidor  
Registered Agent  
530 Harvey Avenue  
Grayslake, IL 60030

Lee M. Anglin  
16200 S. Clinton  
Harvey, IL 60426

Cinergy Corporation  
c/o CT Corporation System  
Registered Agent  
Kentucky Home Life Building  
Louisville, KY 40202

Rumpke of Indiana, Inc.  
c/o CT Corporation System  
Registered Agent  
251 E. Ohio Street, Suite 1100  
Indianapolis, IN 46204

Rumpke of Kentucky, Inc.  
c/o CT Corporation System  
Registered Agent  
Kentucky Home Life Building  
Louisville, KY 40202

Rumpke of Ohio, Inc.  
c/o James Thaxton  
Registered Agent  
10795 Hughes Road  
Cincinnati, OH 45251

Cinergy Corporation  
c/o CT Corporation System  
Registered Agent  
Kentucky Home Life Building  
Louisville, KY 40202

Re: **Notice of Intent to Sue under Resource Conservation  
and Recovery Act**  
Our File: **0385.28**

**THIS IS TO NOTIFY YOU THAT:**

1. The undersigned is counsel for, and serves this Notice on behalf of:

VILLAGE OF RIVERDALE

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***environmental law***

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157 West 144<sup>th</sup> Street  
Riverdale, IL 60827-2707

2. This Notice concerns the property located at 13605 South Halsted Street, Riverdale, (Cook County), Illinois (the "Subject Property"). The Subject Property is more specifically described as including all land identified by the parcel index number (PIN) 25-32-405-021-0000, and shown on the Site Location Map attached as Exhibit A.
3. On information and belief, from approximately 2005 and continuing to the present the Subject Property has been operated as an unlicensed universal waste storage and disposal facility, ("River Shannon Recycling"), owned and/or operated by Mercury Vapor Processing Technologies, Inc., Molidor Venture Capital, LLC, and Lee M. Anglin (collectively "Owners/Operators"). The Subject Property contains a large industrial building with a fenced parking area located immediately to the south, as shown on the aerial photograph attached as Exhibit B.
4. On information and belief, River Shannon receives unknown quantities of universal waste from a variety of waste generators, including Cinergy Corporation, Rumpke of Indiana, Inc., Rumpke of Kentucky, Inc., and Rumpke of Ohio, Inc., (collectively the "Generators"). The waste is then stored throughout the Subject Property for unknown periods of time until it is allegedly recycled by River Shannon on the Subject Property.
5. The Village of (the "Village" or "Riverdale") conducted inspections of the Subject Property on September 10, 2007 and October 4, 2007. Riverdale's inspectors

observed the Subject Property to contain numerous types of universal waste materials such as electrical ballasts, lead-acid batteries, Ni-cad batteries, lithium-ion batteries, cathode ray tubes, computer processing units ("CPUs") and other electronic computer equipment. These waste materials are known to contain certain contaminants such as polychlorinated biphenyls (PCBs), lead and other heavy metals.

6. In addition, Riverdale's inspectors observed large quantities of intact and broken fluorescent and high intensity discharge ("HID") lamps (collectively known as "universal waste lamps") stored on the Subject Property. Several piles of broken universal waste lamps were observed both inside and outside the building located on the Subject Property. A large uncovered roll-off dumpster, filled with broken universal waste lamps, was observed outside the building. Numerous universal waste lamp fragments were observed to be strewn throughout the Subject Property. Representative photographs taken from Riverdale's site inspections are attached as Exhibit C.
7. Universal waste lamps consist of a sealed glass tube containing high levels of mercury in the form of mercury vapor. Once the glass tube is broken, the mercury vapor is released from the glass tube into the environment where it can be aerially deposited to soils and surface waters. Due to their high mercury content, universal waste lamps are classified as a "hazardous waste" within the meaning of the Resource Conservation and Recovery Act, 42 U.S.C. § 6901, *et seq.* ("RCRA").

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8. One or more of the persons or entities to whom this Notice is directed has caused or allowed the release of hazardous substances into the air, soil, groundwater, sediments and surface waters of the Subject Property.
9. As a result of such release, air, soil, groundwater, sediments and surface water at the Subject Property have become contaminated by, or are threatened to be contaminated by, hazardous substances, including mercury.
10. Each of the persons or entities to whom this Notice is directed has contributed or is contributing to the past or present handling, storage or disposal at the Subject Property of substances which are solid waste or hazardous waste, within the meaning of RCRA.
11. The presence of the described hazardous substances located on the Subject Property and the contamination of the air, soils, groundwater, sediments, and surface water at the Subject Property may present an imminent and substantial endangerment to health or the environment, within the meaning of 42 U.S.C. § 6972(a)(1)(B).
12. The Village of Riverdale intends to file suit against each of the persons and entities to whom this Notice of Intent to Sue is directed pursuant to Section 7002(a)(1)(B) of RCRA, 42 U.S.C. § 6972(a)(1)(B), as well as violations under applicable Federal and State statutes, local ordinances and common law.

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VILLAGE OF RIVERDALE



By: \_\_\_\_\_  
Lance E. Franke  
One of Its Attorneys

Person Giving Notice and Legal Counsel Representing the City:

Lance E. Franke  
Jeep & Blazer, LLC  
24 N. Hillside Avenue, Suite A  
Hillside, IL 60162  
(708) 236-0830

cc:

**REGISTERED MAIL, RETURN RECEIPT REQUESTED**

Stephen L. Johnson  
Administrator  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue, N.W.  
Mail Code 1101A  
Washington, DC 20460

Douglas P. Scott  
Director  
Illinois Environmental Protection Agency  
1021 North Grand Avenue East  
P.O. Box 19276  
Springfield, IL 62794-9276

Mary A. Gade  
Acting Regional Administrator  
U.S. Environmental Protection Agency  
Region 5  
77 W. Jackson Blvd.  
Chicago, IL 60604

Lisa Madigan  
Attorney General - State of Illinois  
500 South Second Street  
Springfield, IL 62706

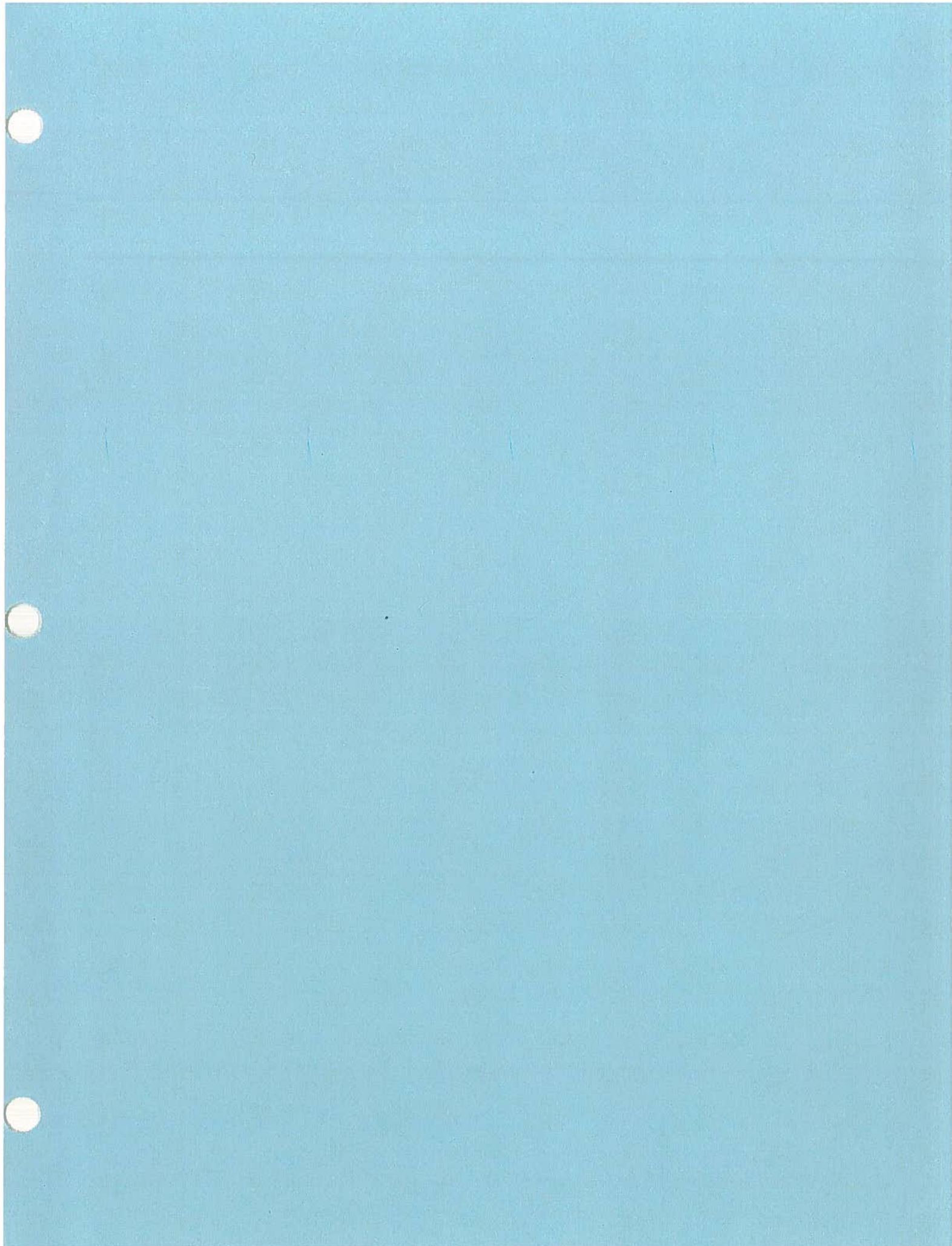
Attorney General  
United States Department of Justice  
Tenth and Pennsylvania Avenues N.W.  
Washington, D.C. 20530



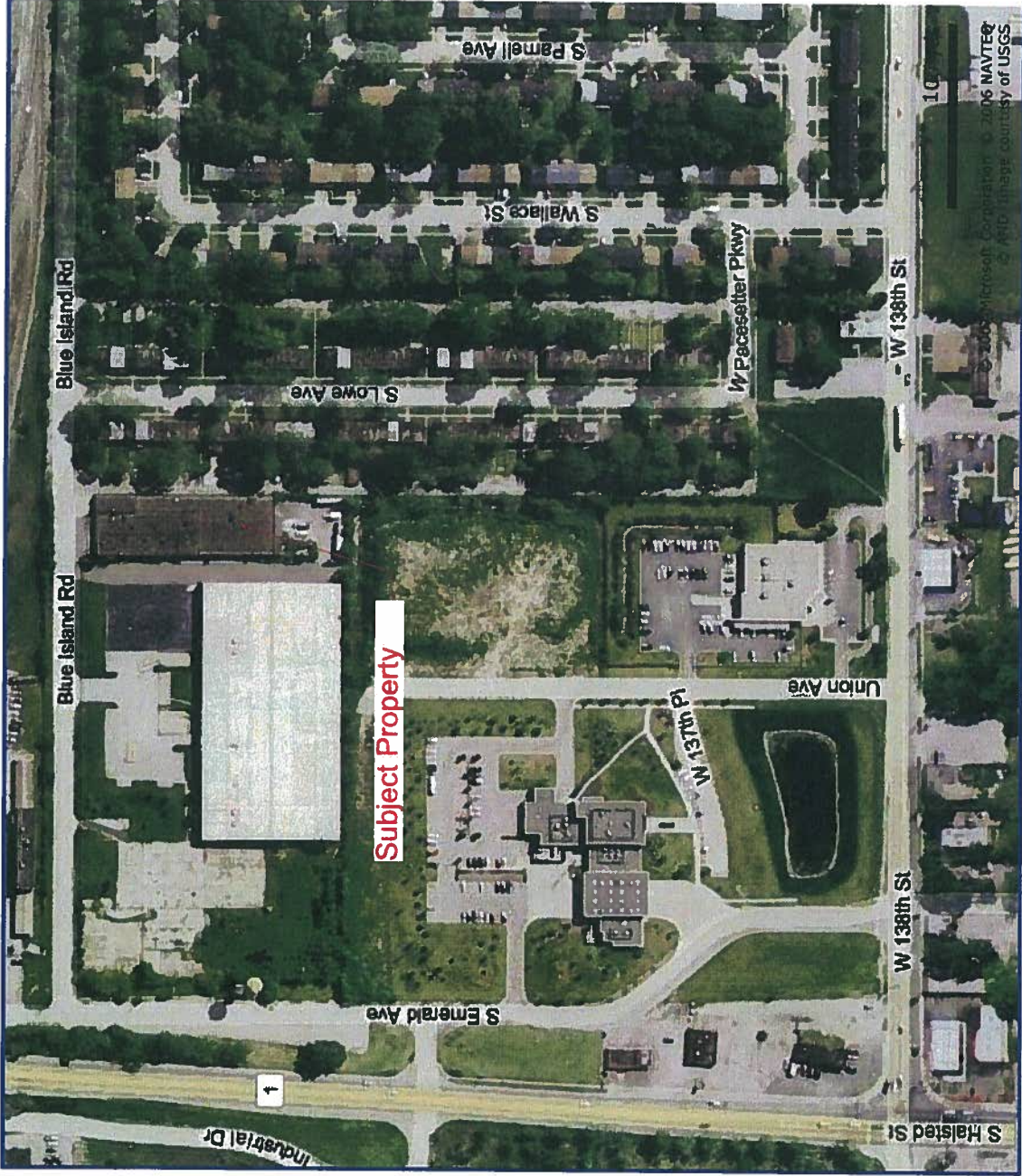












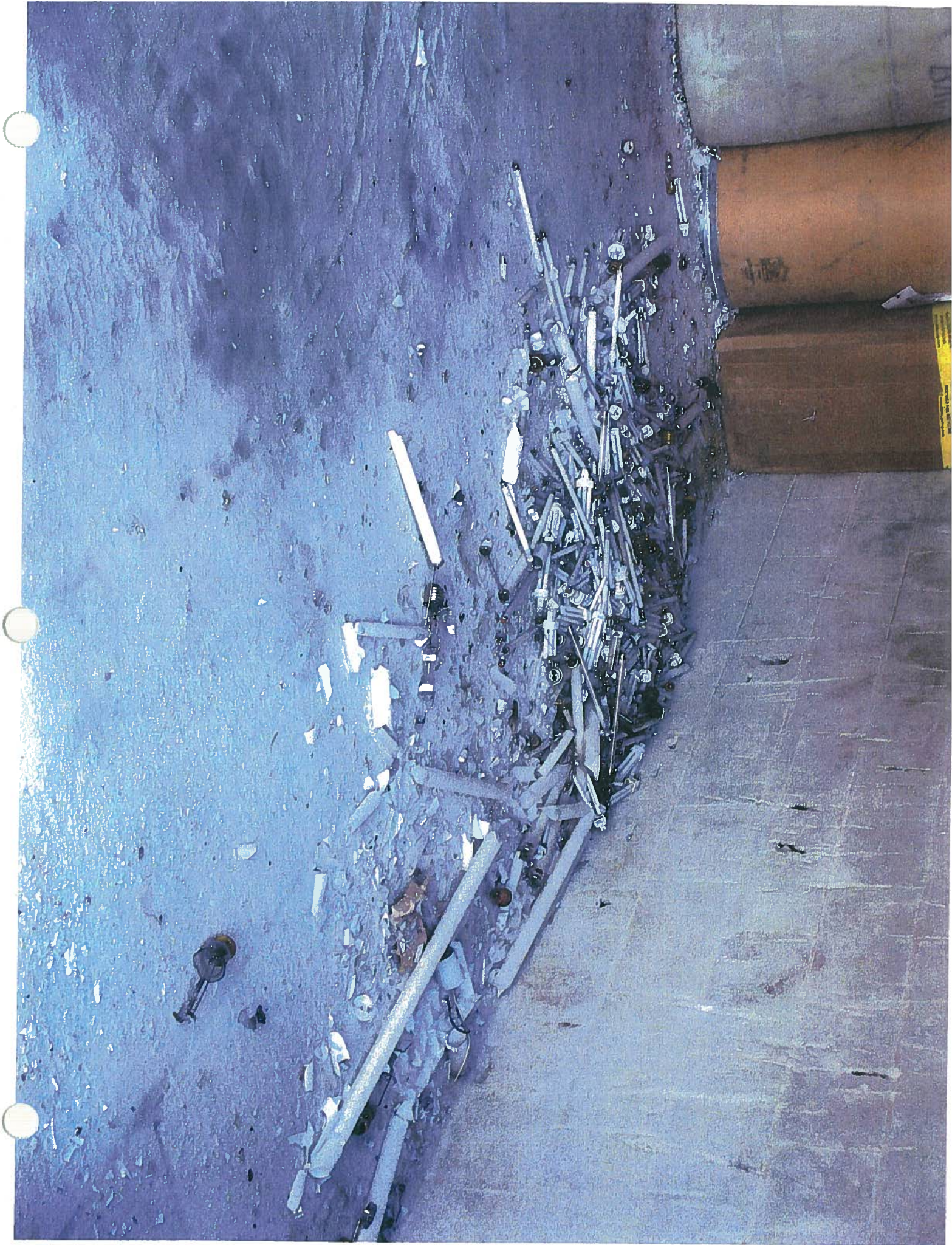
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All image courtesy of USGS



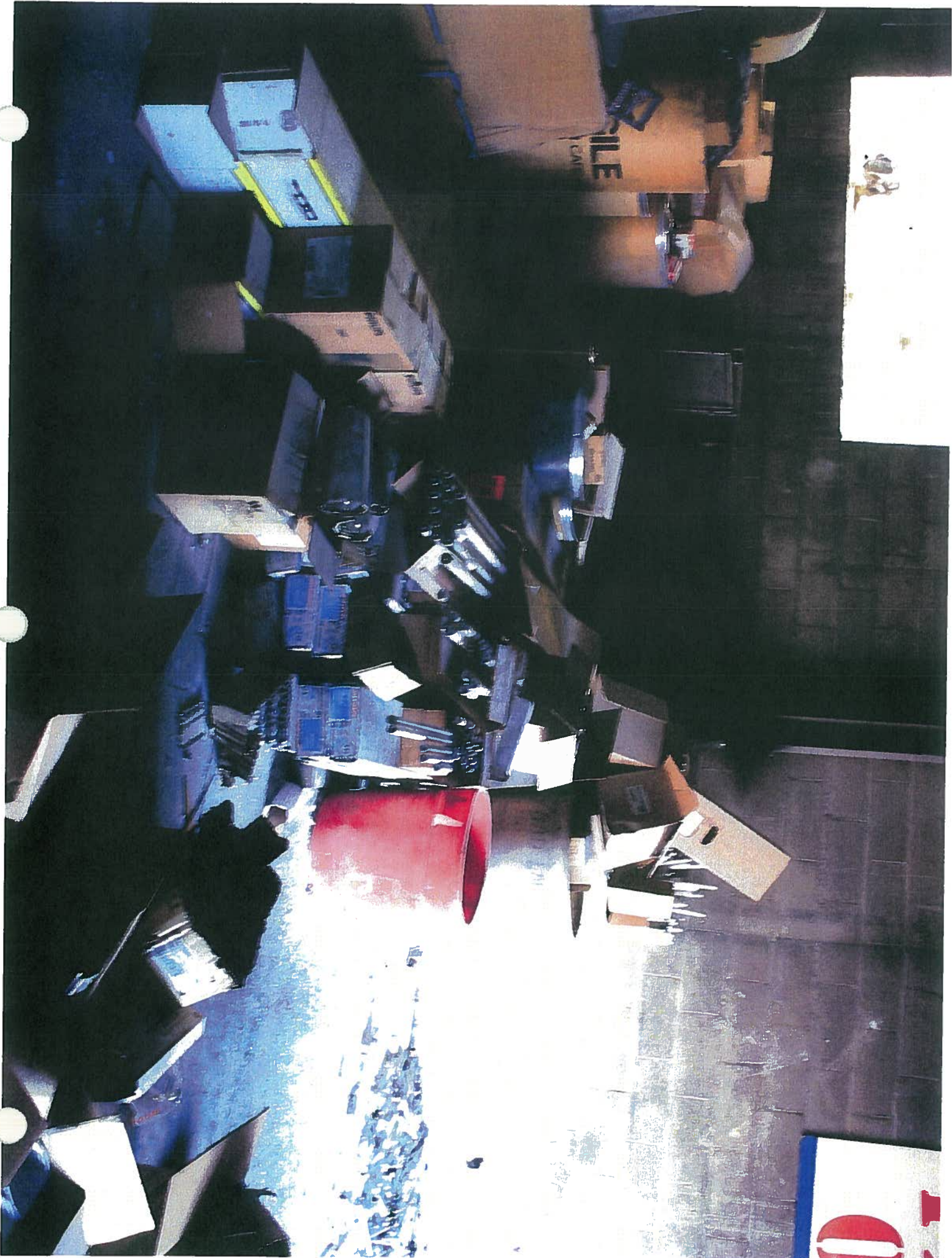
































2006 County of Santa Clara  
14632-00

SW

WESCAM  
DLW  
FALLAVILLE VA





WASTE

48508

Fluorescent

Glass  
Vapor  
Waste

SHAR-SHIE

CF5500





1000  
2/2/100  
2004/03/01

ROLLMASTR

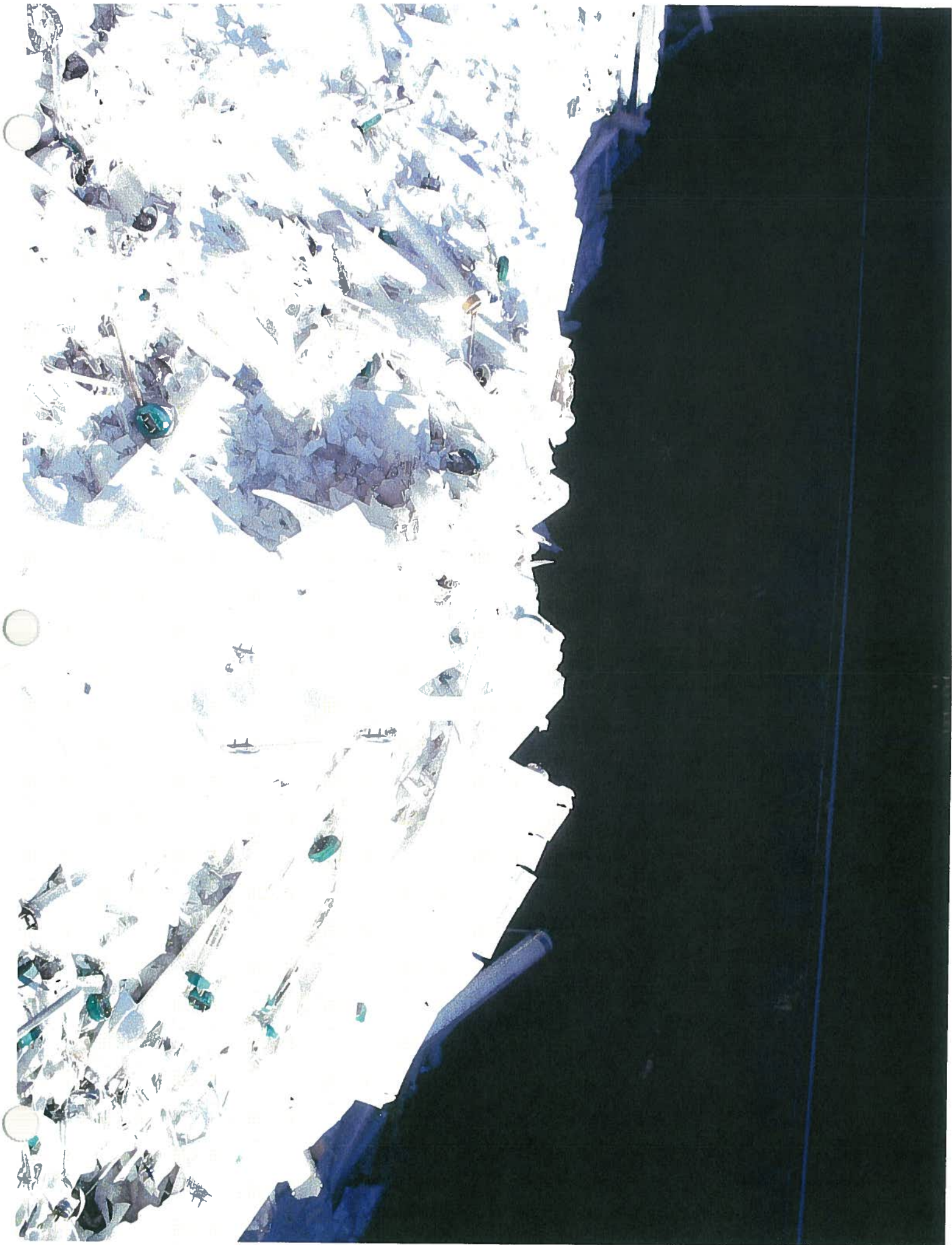
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ologies

























**CINERGY CORP.**

Universal Waste - Mercury - Containing Lamps

Used Lamps

District Name

DEDFORD

Date District Starts Putting Bulbs In This

Container

5/27/02

Date Full Container Sent To Plainfield

10/18/02

IF PAID BY

Used Mercury

Containing Lamps

Pursuant to 40 CFR 273.14

**PUMPKIN**  
Recycles

OH, IN, & KY:  
888.242.0510