

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

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JUN 16 2015

STATE OF ILLINOIS
Pollution Control Board

CENTURY ENVIRONMENTAL)
RESOURCES, INC.,)
Petitioner,)
)
v.)
ILLINOIS ENVIRONMENTAL PROTECTION)
AGENCY,)
Respondent.)

PCB 15- 205
(RCRA Permit Appeal – Ninety Day
Extension)



ORIGINAL

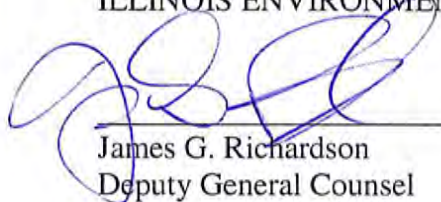
NOTICE

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

J. Ryan Potts
Attorney at Law
30 North LaSalle Street, Suite 1402
Chicago, Illinois 60602

PLEASE TAKE NOTICE that I have today caused to be filed a REQUEST FOR NINETY DAY EXTENSION OF APPEAL PERIOD with the Illinois Pollution Control Board, copies of which are served upon you.

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY


James G. Richardson
Deputy General Counsel

Dated: June 11, 2015
1021 North Grand Avenue East
P.O. Box 19276
Springfield, Illinois 62794-9276
217/782-5544

THIS FILING IS SUBMITTED ON RECYCLED PAPER

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

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STATE OF ILLINOIS
Pollution Control Board

CENTURY ENVIRONMENTAL)
RESOURCES, INC.,)
Petitioner,)

v.)

PCB No. 15- *205*
(RCRA Permit Appeal – Ninety Day
Extension)

ILLINOIS ENVIRONMENTAL)
PROTECTION AGENCY,)
Respondent.)

**REQUEST FOR NINETY DAY EXTENSION
OF APPEAL PERIOD**

NOW COMES the Respondent, the Illinois Environmental Protection Agency (“Illinois EPA”), by one of its attorneys, James G. Richardson, Deputy General Counsel, and, pursuant to Section 40(a)(1) of the Illinois Environmental Protection Act (415 ILCS 5/40(a)(1)) and 35 Ill. Adm. Code 105.208, hereby requests that the Illinois Pollution Control Board (“Board”) grant an extension of the thirty-five (35) day period for petitioning for a hearing to September 16, 2015, or any other date not more than a total of one hundred twenty-five (125) days from the date of receipt of the Illinois EPA’s final decision. In support thereof, the Illinois EPA respectfully states as follows:

1. On May 12, 2015, the Illinois EPA issued a final decision to the Petitioner.
2. On June 8, 2015, the Petitioner made a written request to the Illinois EPA for an extension of time by which to file a petition for review, asking the Illinois EPA to join in requesting that the Board extend the thirty-five day period for filing a petition by ninety days.


Upon information and belief, the Petitioner received the final decision on or about May 14, 2015.

3. The additional time requested by the parties may eliminate the need for a hearing in this matter or, in the alternative, allow the parties to identify issues and limit the scope of any hearing that may be necessary to resolve this matter.

WHEREFORE, for the reasons stated above, the parties request that the Board, in the interest of administrative and judicial economy, grant this request for a ninety-day extension of the thirty-five day period for petitioning for a hearing.

Respectfully submitted,

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY



James G. Richardson
Deputy General Counsel

Dated: June 11, 2015

1021 North Grand Avenue, East
P.O. Box 19276
Springfield, Illinois 62794-9276
217/782-5544
217/782-9143 (TDD)

THIS FILING IS SUBMITTED ON RECYCLED PAPER



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276 • (217) 782-2829

BRUCE RAUNER, GOVERNOR

LISA BONNETT, DIRECTOR

217/524-3300

May 12, 2015

CERTIFIED MAIL

7012 0470 0001 2976 7180

7012 0470 0001 2976 7197

Terry Zarowny
228 Beacon Place
Munster, IN 46321

Century Environmental Resources, Inc
Attn: Terry Zarowny
13005 Hamlin Courty
Alsip, Illinois 60658

Re: IEPA #0310030002-Cook County
USEPA ILD099215303
Century Environmental Resources, Inc.
RCRA Log No. B-115R2
Permit Part B - Administrative Record
Permit Denial

Dear Mr. Zarowny:

This will acknowledge receipt of your application to renew your RCRA Part B Permit. The application for a RCRA permit was received by this Agency on November 3, 2014.

Your permit application to renew your RCRA Part B Permit is denied.

The final permit decision is based on the administrative record contained in the Illinois EPA's files. The contents of the administrative record are described in 35 Illinois Administrative Code (I.A.C.) Section 705.211.

The Agency is required under Section 39(a) of the Illinois Environmental Protection Act (415 ILCS39(a)) to provide the applicant with specific reasons for denial of a permit application. The reasons for denial of this permit are contained in Attachment 1 of this correspondence.

The applicant may appeal this final decision to the Illinois Pollution Control Board pursuant to Section 40 of the Act by filing a petition for a hearing within 35 days after the date of issuance of the final decision. However, the 35-day period may be extended for a period of time not to exceed 90 days by written notice from the applicant and the Illinois EPA within the initial 35-day appeal period. If the owner or operator wishes to receive a 90-day extension, a written request that includes a statement of the date the final decision was received, along with a copy of this decision, must be sent to the Illinois EPA as soon as possible.

4302 N. Main St., Rockford, IL 61103 (815) 987-7760
595 S. State, Elgin, IL 60123 (847) 408-3131
2125 S. First St., Champaign, IL 61820 (217) 278-5800
2009 Mall St., Collinsville, IL 62234 (618) 346-5120

9511 Harrison St., Des Plaines, IL 60016 (847) 294-4000
412 SW Washington St., Suite D, Peoria, IL 61602 (309) 671-3022
2309 W. Main St., Suite 116, Marion, IL 62959 (618) 993-7200
100 W. Randolph, Suite 10-300, Chicago, IL 60601 (312) 814-6026

For information regarding the request for an extension, please contact:

Illinois Environmental Protection Agency
Division of Legal Counsel
1021 North Grand Avenue East
Post Office Box 19276
Springfield, IL 62794-9276
217/782 5544

For information regarding the filing of an appeal, please contact:

Illinois Pollution Control Board, Clerk
State of Illinois Center
100 West Randolph, Suite 11 500
Chicago, IL 60601
312/814 3620

If you have any questions concerning this denial, please contact Mary Riegle at 217/524-3329 .
If you intend to seek review of the USEPA issued permit decision, please contact Jim Blough
Region V REGION V at 312/886-2967 concerning the applicable review procedures.

Sincerely,



Stephen F. Nightingale, P.E.
Manager, Permit Section
Bureau of Land

SFN:MER:^{TD}0310030002-RCRA-B115R2-Denial

Attachments: Attachment 1

Attachment 1

Century Environmental Resources Inc
Reasons for Denial
May 11, 2015
LPC#0310030002
RCRA Log No. B-115R2

A.1 Forms and Permits

A.1.1 RCRA Part A Application: 702.121, 702.123, 702.126(a) and (d), 703.181

1. The applicant failed to provide a Part A application that is consistent with the Part B application including a complete and consistent listing of hazardous waste codes on the Part A application and Part B applications.
2. The Part B permit application lists hazardous waste units that are not listed on the Part A including a hazardous waste fuel blending program and a hazardous waste solvent recovery program which is proposed to be conducted in tanks. The Part A application does not contain any information on tanks included on the Part B application.
3. The applicant failed to provide a properly completed LPC-PA23.
 - a. The LPC-PA23 submitted is marked as storage but the Part A application indicates that the application is for storage and treatment.
 - b. The LPC-PA23 submitted lists Terry L. Zarowny as the owner and operator while the Part A lists Century Environmental Resources, Inc. as the owner and operator.

B FACILITY DESCRIPTION

1. The applicant failed to describe all Solid Waste Management Units (SWMUs) at the facility. This includes both hazardous and nonhazardous units, satellite accumulation areas, Leaking Underground Storage Tanks (LUSTs), units in the Site Remediation Program (SRP), and units that are/will be closed.
2. The description of each unit should have included the type of SWMU (container storage, tank, surface impoundment, etc.), the wastes managed in the unit, and its size or capacity.
3. The location of each SWMU was not identified on a scale drawing of the facility.
4. The description of SWMUs did not indicate if the unit is/was addressed in the corrective action portion of the permit application, the LUST Program (include the incident number), or the Site Remediation Program.

5. The applicant did not indicate if there has been a release from the unit.
6. The description of each closed units should have identified the IEPA Log Number for the closure plan, when the unit was closed, and when/if the certification of closure was approved.
7. The list of SWMUs provided conflicts between Sections D in the application and the Part A application including the description of:
 - a. truck pad 1 at a capacity of 5,500 gallons or 2,200 gallons.
 - b. The proposed warehouse
 - c. Tanks

C.1.1 General Chemical Information and Analyses 703.183(b), 724.113(a)

1. The permit application did not include the following information for each hazardous waste stored, treated or disposed at the facility:
 - a. A description of the waste
 - b. The unit where it will be managed
 - c. Its physical state (solid, liquid, gas) at standard temperature and pressure
 - d. the basis for hazard designation
 - e. Laboratory analysis no more than five years old, signed and dated, that details the chemical and physical analyses of a representative sample of the hazardous wastes managed at the site, (i.e., provide a typical analysis of an ignitable, corrosive, reactive and TCLP toxic waste, if managed)
 - f. A table summarizing the analytical results for all of the wastes managed in the RCRA units; and
 - g. The identity of any dioxin containing waste, acutely toxic wastes and wastes containing free liquids as determined by the Paint Filter Liquids Test, Method 9095, in USEPA's publication SW-846 "Test Methods for Evaluating Solid Waste" (3rd edition and most recent finalized updates) will be managed
2. The application should have contained analyses which includes all information necessary to treat, store or dispose of the hazardous wastes properly in accordance with Subtitle G.

D1.1 Description of Containers: 724.271, 724.272

1. The applicant failed to provide the approximate number of each type of container and maximum volume of each unit. The information provided in the Part B application does not match the Part A application. The new Part A that was received March 18, 2015 does not match the list of units in the revised Part B application received March 18, 2015.

D1.2 Container Management Practices: 703.188, 724.271, 724.273

1. The applicant failed to provide a scale drawing of the storage unit showing:
 - a. The arrangement of containers when the storage area is at maximum capacity.
 - b. The locations where ignitable and reactive wastes, and containers with free liquids will be stored.

- c. The locations where incompatible wastes will be stored, including specific location where the different waste classifications, which are identified using the operating procedures will be stored. Methods of classifying compatibility should have been provided including a complete description of the method and justification for its selection to fulfill the requirement of 724.277.
 - d. The minimum aisle space that will be maintained. The applicant failed to demonstrate that the aisle space is sufficient:
 - 1) to allow for inspection of each container (a minimum of 2.5 feet);
 - 2) to comply with the NFPA 30, Flammable and Combustible Liquids Code for pile arrangements; and
 - 3) to allow for movement of emergency equipment within the RCRA unit; and
 - e. The flow direction of spilled liquids in the container storage area.
2. Because there is conflicting information as to what units are being requested the Agency cannot be assured the container management practices submitted included all the information necessary to accurately reflect the proposed facility.

D1.3 Secondary Containment System Design and Operation: 703.201(a), 724.275(a), (b) and (d)

The applicant failed to provide design drawings that demonstrate that the secondary containment system did not contain drains or underground piping. The secondary containment system design did not include plans to remove any drains or underground piping associated with the secondary containment system that cannot be inspected.

D1.3.2 Requirement for the Base or Liner to Contain Liquids: 724.275(b)(1)

1. The applicant did not include a description of how the base or liner is capable of containing liquids, including:
 - a. An inspection report stating that the base is free of cracks or gaps;
 - b. Base design specifications, and materials of construction;
 - c. An engineering evaluation of the base's structural integrity which demonstrates the base is strong enough to hold the weight of the containers and the equipment used to move containers (e.g. forklifts) without cracking. This evaluation must be certified by an Illinois Registered Professional Engineer; and
 - d. Demonstration that the secondary containment system is impermeable to, and compatible with the wastes stored in it. There was no documentation that the base was coated with a compatible sealer and the construction joints and water stops were made of materials that are impermeable to, and compatible with the wastes managed in the area. Copies of the manufacturer's specifications for the sealers and joint grouts and documentation that they are compatible with the wastes managed in each area were not provided.
2. Information on the integrity of the unit located in exhibit D-41 was dated 2004 and is not sufficient to fulfill the above requirements.

D1.3.3 Containment System Drainage: 703.201(a)(2), 724.275(b)(2)

1. The applicant did not demonstrate that the base is either:
 - a. sloped or the containment system is otherwise designed and operated to drain and remove liquids resulting from leaks, spills, or precipitation; or
 - b. Alternatively, demonstrate the containers are elevated or are otherwise protected from contact with accumulated liquids.

D1.3.4 Containment System Capacity: 703.201(a)(3), 724.275(b)(3)

The applicant did not provide calculations which demonstrate that the containment system will have sufficient capacity to contain at least 10 percent of the volume of the containers or the volume of the largest container, whichever is greater.

D1.3.5 Control of Precipitation: 703.201(a)(4), 724.275(b)(4)

The applicant failed to demonstrate how run-on into the containment system will be prevented:

1. A description of the dikes, berms, drainage system, etc., used to prevent run-on should have been provided; or
2. a demonstration that the collection system has sufficient excess capacity in addition to that required by 724.275(b)(3) to contain any run-on and precipitation that might enter the system. This should have included calculations of the excess capacity to contain precipitation from a 24-hour, 25-year storm

D1.3.6 Removal of Liquids from Containment System: 703.201(a)(5), 724.275(b)(5)

The applicant failed to demonstrate how spilled or leaked waste and accumulated precipitation will be removed from the sump or collection area in a timely manner to prevent overflow of the containment system:

1. The applicant failed to describe the procedures and equipment used during liquid removal including calculations of the time precipitation can accumulate in the containment system before it overflows (use a 24-hour, 25-year storm event as the basis for the calculations).
2. The applicant failed to specify the methods for determining whether the material removed from the secondary containment system is a hazardous waste and for handling it if it is hazardous.

D.2 Tank Systems 703.202, 703.188, 724.296

The latest submittal received March 18, 2015 indicated that the facility will no longer be requesting to permit any hazardous waste tanks. However, section D "Process Information" of the application lists several tanks and description of their use. The information included in this section of the application is not current and does not match what is listed in the Part A or other sections of the Part B application. It remains unclear what activity the applicant proposes to conduct with regards to the previously permitted units. The applicant should have provided specific instructions on removing this section from the application or add these tanks to the Part A application and all other applicable sections of the application.

E.10 Description of Corrective Action for Solid Waste Management Units (SWMUs):
724.201

The applicant did not revise Section E.10 of the Renewal Application as follows:

- a. State Section E.10 is not applicable; and
- b. Provide information stating why this sections is not applicable at this time.

G.1.1 Executive Summary: 724.150-724.156

The applicant failed to summarize the evaluation and include a description of the worst-case scenario for both a spill and a fire at the facility. This description needs to include all of the following:

- a. The location(s) of the worst-case spill and fire at the facility.
- b. The chemicals involved.
- c. Identify the maximum horizontal extent of the AEL concentration in the gas plume on a scale drawing of the area. Show the source, facility property line, roads, and all receptors.
- d. Indicate the duration of the release.

G.1.3 Chemical & Physical Properties of Wastes Managed at the Site: 724.150-724.156

The applicant failed to provide an evaluation that considered the waste types and the chemical and physical properties of the materials managed at the facility. In addition, in order to determine the consequences of a fire or spill, it needs to consider the products of incomplete combustion of those materials, and the appropriate exposure limit (AEL) for each compound managed at the facility.

G.1.3.1 Waste Properties: 703.183(t), 703.183(g), 724.137, 724.150-724.156

The applicant failed to identify all constituents in Appendix H of 721 that are (will be) present in the wastes managed at the facility. Provide the chemical and physical properties for these compounds. The information provided in Section C.1.2 of the application can be referenced.

G.1.3.2 <u>Products of Incomplete Combustion (PICs)</u> : Identify the most toxic products of incomplete combustion that would be generated if any of the wastes managed at the facility were to be engulfed in a fire. This information must be compiled for each waste to be managed at the facility. Examples of incomplete products of combustion that would be of concern are shown in the following table: Waste Type Involved in Fire	Products of Incomplete Combustion
Aliphatic chlorinated hydrocarbons	Phosgene, HCl
Non-substituted aromatics	CO, CO ₂ , Alcohols
Nitrated compounds	NO, NO ₂ , N ₂ O
Sulfur bearing wastes	SO ₂ , SO ₃
Cyanide bearing wastes	Hydrogen cyanide gas
Fluoride bearing wastes	Hydrogen fluoride gas
Bromine containing wastes	Hydrogen bromide gas

G.1.3.3 Appropriate Exposure Limit: Identify an appropriate exposure limit (AEL) for each of the wastes or compounds managed at the site. Also identify an AEL for each of the products of incomplete combustion. Provide the basis for choosing the AEL for each compound. The AEL should be established pursuant to the procedures on Page 6-17 of the document entitled "Handbook of Chemical Hazard Analysis Procedures" available free of charge from the Federal Emergency Management Agency (FEMA) in Washington, D.C. (202/646-3484). As a starting point, the AEL could be established as the highest value of the following:

- IDLH/10
- TLV-STEL
- 3 x TLV-TWA (if no TLV-STEL exists)
- TLV-C

G.1.3.4 Ranking of AELs: Provide a ranking of the hazardous wastes managed at the facility according to their AEL (lowest AEL receives highest ranking). A separate ranking (independent of AEL) based upon vapor pressure must also be prepared (compound with highest vapor pressure receives highest ranking).

G.1.4 Air Modeling: 703.183(t), 703.183(g), 724.137, 724.150-724.156

The evaluation/assessment of the consequences of a fire or spill at the facility necessarily includes air modeling of these incidents. The applicant failed to provide the following information regarding the model that will be used:

Limitations: Identify and discuss the strengths and weaknesses of the model.

Justify Assumptions: Identify the assumptions associated with the model in applying it to the situation at hand. Provide justifications for all assumptions used in the evaluation.

Input Data: Identify all input data. The sources of all input data must be documented. At a minimum, the input data must include the following conditions:

- a. Stable (Type F) atmospheric conditions should be evaluated (wind speed of 1.5 m/s (3.4 mph))
- b. The maximum air temperature for summer at the site, (the facility may also want to model the conditions at the site during the winter, and spring/fall).
- c. The AELs established Section G.1.3 should be used in determining the area impacted by the release and the length of time over which the release will impact human health (e.g. exceed the AEL).
- d. Size and depth of the pool. Specify the dimensions of any secondary containment, if present.

Evaluation/Assessment Report: Using the information required above, perform an evaluation, and report the findings for each of the following scenarios and wastes/compounds managed at the facility. That is, use the air model to evaluate the transport and dispersion of air-borne toxic compounds generated during spills, fires, or an explosion (e.g. releases) at the facility.

Note: For the purpose of these evaluations, an “off-site impact” is any situation in which an AEL is found beyond the facility property line.

Scenarios: Evaluate the consequences of a release in each of the following scenarios:

- a. The largest container used to manage hazardous waste (this includes a tank truck).
- b. The largest tank used to manage hazardous waste.
- c. The largest volume that can be released from a tank or container that does not have an off-site impact.

Unless the application proposes to limit the amount of a particular compound that is managed in a unit at the facility, the evaluation must assume that the container and tank in these scenarios contain 100% of each of the following compounds.

Note: if the application proposes to limit the amount of a certain compound at the facility, the Waste Analysis Plan must include procedures to verify this condition is always met.

Wastes: For each of the above scenarios, evaluate all the following compounds:

- a. The compound with the highest AEL ranking (see Section G.1.3.4).
- b. The compound with the highest vapor pressure ranking.
- c. The compound with the highest combined AEL and vapor pressure ranking.

Note: If the facility does not manage these “worst case” compounds on a regular basis, it may also want to evaluate additional compounds that are regularly managed at the facility as part of the permit application.

Air Model Results & Evaluation: Present the results of each air modeling run. In addition to the computer printouts, this presentation must include an evaluation and discussion of the results. For each compound of concern and scenario evaluated, provide the following information and discuss:

The on-site and off-site effects. Identify the possible hazards that may result from a release, fire or explosion involving the compound being modeled. Discuss the effects of any toxic, irritating or asphyxiating gases that could be generated, the effects of any hazardous surface water run-off from the water or chemical agents used to control a fire, and any heat-induced explosions.

The areas and populations which could be affected;

Identify the maximum extent of the AEL concentration on a scale drawing of the facility and surrounding area. At a minimum, the drawing must show the concentrations within the plume, the source, facility property line, roads, railroad crossings, buildings, major topographic features, and all receptors. Also indicate the locations of any fire stations, police stations, and hospitals. Show the location of the plume for both the wind direction that would carry the gas plume to the nearest off-site receptors, and the most common wind direction as indicated on the wind rose.

Identify the time it will take AEL concentration in the gas plume to reach its maximum extent.

Identify the time the AEL concentration will remain at a steady state, and the overall duration of the off-site impact.

Describe the arrangements, if any, the residents in the community have with facility in response to a sounding of the facility alarm siren.

Indicate the conditions that would result in evacuation of the facility or the surrounding area. Identify the time required to initiate evacuation procedures.

In addition to above deficiencies, because there is conflicting information as to what units are being requested the Agency cannot be assured the air modeling submitted included all the information necessary to accurately reflect the proposed facility.

I CLOSURE AND POST-CLOSURE REQUIREMENTS

I.1 Closure Plan: 703.183(m), 724.212

The applicant failed to provide a written closure plan that describes how each hazardous waste management unit (HWMU) will be closed in compliance with all of the applicable requirements.

The closure plan in the application contains closure for units that are not being proposed in this permit.

In addition, because there is conflicting information as to what units are being requested the Agency cannot be assured that the closure plan submitted included all the information necessary to accurately reflect the proposed facility.

I.1.2 Maximum Operations and Waste Inventory: 724.212(b)(2) & (3)

The applicant failed to provide:

1. the dimensions and capacity of each HWMU that will exist during the active life of the facility; and
2. Provide an estimate of the maximum inventory of wastes ever in storage and in treatment at any time during the active life of the facility.

The units listed in the closure plan does not match the Part A or application or several section of the application. The closure plan is for Truck Pad's 1,2,3, 5 and a lab pack repackaging, container storage area and Tanks 11,12 and13. The Part A indicates the areas are Truck Pad's 1,2,5, lab pack repacking area and a container storage area. Therefore the closure information is incomplete.

I.5 Closure Cost Estimate: 703.183(o), 724.242

Third Party Costs: The applicant failed to provide a cost estimate based on third party costs and cannot include salvage value for sale of hazardous wastes, facility structures or equipment.

A cost estimate was provided but no supporting documentation was provided. Cost estimates from a third party for each activity to support the cost estimate should have been provided.

I.5.2 Maximum Cost Estimate: The applicant failed to provide an estimate that was calculated to cover the cost of closure when the cost would be greatest (e.g. for the maximum volume of permitted waste).

The units listed in the closure plan does not match the Part A or application or several section of the application. In addition because there is conflicting information as to what units are being requested the Agency can not be assured the plan submitted included all information necessary to accurately reflects the proposed facility.

K. CORRECTIVE ACTION (35 Ill. Adm. Code 724.201)

This section of the application is incomplete for the following reasons:

1. Pages K-1 through K-5 have a date of December 2003 in the upper right corner of each page. A review of these pages then indicates that they contain information regarding corrective action activities that occurred at the facility through December 2003. These pages must be updated to include information regarding RCRA corrective action activities that have been carried out since December 2003.
2. There are several documents present after Page K-5. However, there is no index listing the various document nor is there any discussion of the contents and purpose of each document.

It is important that Section K present a complete and organized discussion of corrective action activities at the Century Resources facility so that an accurate description of the status of the facility's corrective action program is present in the administrative record associated with any final decision on this permit application. Based on a review of the Illinois EPA files, Century Resources has completed all corrective action activities at the facility. Section K must be updated to reflect this fact and describe what transpired to achieve this endpoint.

The applicant must revise the Renewal Application to include the groundwater-related information required by Section K.4 of the July 2006 Decision Guide. This information must address all corrective action activities for groundwater that have been completed to date at the facility, including but not limited to all groundwater analytical results.

CC.3 Standards for Tanks: 724.984

Information for tanks is included in this section but not included in the Part A or other applicable portions of the application.

RECEIVED
CLERK'S OFFICE

JUN 16 2015

STATE OF ILLINOIS
Pollution Control Board

CERTIFICATE OF SERVICE

I, the undersigned attorney at law, hereby certify that on June 11, 2015 I served true and correct copies of a REQUEST FOR NINETY DAY EXTENSION OF APPEAL PERIOD by first class mail of the United States Postal Service upon the persons as follows:

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

J. Ryan Potts
Attorney at Law
30 North LaSalle Street, Suite 1402
Chicago, Illinois 60602

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY



James G. Richardson
Deputy General Counsel
Division of Legal Counsel
1021 North Grand Avenue East
P.O. Box 19276
Springfield, Illinois 62794-9276
217/782-5544
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