

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

In re:

Crysalis Biosciences, Inc.,
Petitioner.

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(Provisional Variance – Land)

NOTICE

Don Brown, Clerk
Illinois Pollution Control Board
60 East Van Buren St., Suite 630
Chicago, IL 60605
don.brown@illinois.gov

Crysalis Biosciences Inc.
Attn: Brad Ross
Logistics and Procurement Manager
231 Monsanto Avenue
Sauget, IL 62201
bross@crysalisbio.com

PLEASE TAKE NOTICE that I have today caused to be filed a **Provisional Variance** with the Illinois Pollution Control Board, copies of which are served upon you.

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY



Melanie A. Jarvis
Deputy Chief Counsel – Land Enforcement
1021 North Grand Avenue East
P.O. Box 19276
Springfield, Illinois 62794-9276
217/782-5544
melanie.jarvis@illinois.gov
Dated: July 23, 2025

THIS FILING IS SUBMITTED ON RECYCLED PAPER

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

July 7, 2025

In re:

Crysalis Biosciences, Inc.,
Petitioner.

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(Provisional Variance – Land)

Re: Request for Provisional Variance Pursuant to 35 Ill. Adm. Code 722.117(b)

Crysalis Biosciences, Inc.
Attn: Brad Ross
Logistics and Procurement Manager
231 Monsanto Ave.
Sauget, IL 62201

Dear Mr. Ross:

The Illinois Environmental Protection Agency ("Illinois EPA") has reviewed your June 26, 2025 request for a provisional variance pursuant to 35 Ill. Adm. Code 722.117(b). Based on this review, a provisional variance for a period of 30-days is **GRANTED** by the Illinois EPA.

The applicable facts of this request are as follows:

This site was purchased at a tax sale, and it had been unoccupied and unused since 2019. When the new owner took possession of the site, there were multiple leftover chemicals and empty drums/totes left scattered throughout the site. In March 2025, Crysalis started to move these materials into a secured building to be inventoried and identified. On April 8, 2025, Crysalis began categorizing these materials and determined this to be the accumulation date for the chemicals that they were going to dispose.

35 Ill. Adm. Code 722.117(b) allows a generator to seek an extension of up to 30 days by means of a provisional variance from the Illinois EPA if hazardous waste must remain on-site for longer than 90 days due to unforeseen, temporary, and uncontrollable circumstances. The Illinois EPA finds that such facts and circumstances exist in this situation and hereby **GRANTS** a provisional variance pursuant to 35 Ill. Adm. Code 722.117(b) for a period of 30 days.

The Illinois EPA grants this provisional variance in accordance with its authority contained in Sections 35(b), 36 (c), and 37(b) of the Illinois Environmental Protection Act (415 ILCS 5/35(b), 36(c), and 37(b)) and 35 Ill. Adm. Code 722.117(b). The decision to grant this

provisional variance is not intended to address compliance with any other applicable laws or regulations.

Sincerely,

A handwritten signature in blue ink that reads "Andrew Armstrong". The signature is written in a cursive, flowing style.

Andrew Armstrong
Chief Legal Counsel
Illinois EPA



Crysalis Biosciences Inc
231 Monsanto Avenue
Sauget, IL 62201

June 26, 2025

VIA EMAIL melanie.jarvis@illinois.gov

Illinois Environmental Protection Agency
Attn: Melanie Jarvis, Division of Legal Counsel
2520 W. Iles Ave
P.O. Box 19276
Springfield, Illinois 62794-9276

Subject: **Request for 30-Day Extension of Hazardous Waste Accumulation Time Limit Pursuant to 35 Ill. Adm. Code 722.117(b)
Crysalis Biosciences Inc., EPA ID# ILR00016048**

Dear Ms. Jarvis,

On behalf of Crysalis Biosciences Inc, this letter respectfully requests a 30-day extension for accumulation of hazardous waste pursuant to 35 Ill. Adm. Code 722.117(b), Accumulation Time Limit Extension.

Crysalis Biosciences Inc. owns an ethanol plant at 231 Monsanto Avenue, Sauget, IL 62201, EPA Identification Number ILR00016048. Crysalis purchased the plant in a tax sale, following the bankruptcy of the prior owner. When Crysalis purchased the property, it had been unoccupied and unused since the previous owner ceased operations in 2019. There were multiple leftover chemicals and empty drums/totes left on site that were scattered throughout the property. In March 2025, the site started moving these materials to a secure building to be inventoried and identified. In April 2025, the site began categorizing this material, with an accumulation date of 04/08/2025. Originally, Crysalis qualified as Very Small Quantity Generator (VSQG) but recently notified as a Large Quantity Generator (LQG) for the one-time disposal of this material.

Approximately 6,400 gals of hazardous waste is currently accumulating in the plant's "Co2 Building" in totes and drums with proper aisle spacing and labeling. The current accumulation time limit expires on 07/07/2025. A 30-day extension is requested to extend the accumulation time limit to 08/06/2025 due to the following unforeseen, temporary and uncontrollable circumstances:

- Some of the material is designated as "unknown" and samples have been sent for analysis. There have been unforeseen delays with receiving analytical data from the lab.
- The integrity of some of the totes and drums has been compromised and the material needs to be transferred to reconditioned totes for the material transfer to comply with DOT transportation requirements. There have been scheduling delays in coordinating the material transfer with the vendor.
- A recent train derailment cut off access to the facility.



Crysalis Biosciences Inc
231 Monsanto Avenue
Sauget, IL 62201

During this extended accumulation period, the hazardous waste will continue to be managed in full compliance with applicable regulations, including increased inspections and maintaining proper aisle spacing. The 30-day extension will allow our facility the necessary time to receive analyticals, schedule material transfer to appropriate totes for transportation and disposal of the material offsite in a timely manner.

If there are any questions or if further information is required, please contact me at 636.352.3314 or bross@crysalisbio.com.

Sincerely,

A handwritten signature in black ink, appearing to read 'Brad Ross', is written over the word 'Sincerely,'.

Supply Chain, Logistics and Procurement Manager
Crysalis Biosciences Inc

CERTIFICATE OF SERVICE

I, the undersigned attorney at law, hereby certify that on July 23, 2025, I served true and correct copies of a **Provisional Variance** by the method(s) and to the persons identified below:

Electronic Service

Don Brown, Clerk
Illinois Pollution Control Board
60 East Van Buren St., Suite 630
Chicago, IL 60605
don.brown@illinois.gov

Crysalis Biosciences Inc.
Attn: Brad Ross
Logistics and Procurement Manager
231 Monsanto Avenue
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ILLINOIS ENVIRONMENTAL PROTECTION AGENCY



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