

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

PEOPLE OF THE STATE OF ILLINOIS,	)	
by KWAME RAOUL, Attorney	)	
General of the State of Illinois,	)	
	)	
Complainant,	)	
	)	No.
v.	)	
	)	
A & R CUSTOM CHROME	)	
PLATING, LLC, an involuntarily dissolved	)	
Illinois limited liability company,	)	
	)	
Respondent.	)	

NOTICE OF FILING

TO: Persons on Attached Service List (VIA ELECTRONIC FILING)

PLEASE TAKE NOTICE that on Wednesday, August 12, 2026, I filed with the Office of the Clerk of the Illinois Pollution Control Board by electronic filing the Complaint, a true and correct copy of which is attached hereto and hereby served upon you. You may be required to answer the charges of the Complaint at a hearing before the Board, at a date set by the Board.

Failure to file an answer to this complaint within 60 days may have severe consequences. Failure to answer will mean that all allegations in the Complaint will be taken as if admitted for purposes of this proceeding. If you have any questions about this procedure, you should contact the hearing officer assigned to this proceeding, the clerk's office, or an attorney.

Respectfully submitted,

PEOPLE OF THE STATE OF ILLINOIS,
KWAME RAOUL, Attorney General of the State
of Illinois

By: /s/ Taylor Desgrosseilliers
Taylor Desgrosseilliers
Assistant Attorney General
Environmental Bureau
115 S. LaSalle St., 23rd Floor
Chicago, Illinois 60603
(773) 505-5288
t.desgrosseilliers@ilag.gov

SERVICE LIST

A&R Custom Chrome Plating
c/o Abraham Chavez
6528 South Laverne Avenue
Bedford Park, IL 60638

CERTIFICATE OF SERVICE

I, Taylor Desgrosseilliers, an Assistant Attorney General, certify that on the 12th day of August 2026, I caused to be served the foregoing Notice of Filing and Complaint on the parties named on the attached Service List, by depositing an envelope by certified mail with return receipt with the U.S. Post Office located at 115 South LaSalle Street, Chicago, Illinois 60603.

/s/ Taylor Desgrosseilliers
Taylor Desgrosseilliers
Assistant Attorney General
Environmental Bureau
115 S. LaSalle St., 23rd Floor
Chicago, Illinois 60603
(773) 505-5288
t.desgrosseilliers@ilag.gov

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

PEOPLE OF THE STATE OF ILLINOIS,	)	
by KWAME RAOUL, Attorney	)	
General of the State of Illinois,	)	
	)	
Complainant,	)	
	)	No.
v.	)	
	)	
A & R CUSTOM CHROME	)	
PLATING, LLC, an involuntarily dissolved	)	
Illinois limited liability company,	)	
	)	
Respondent.	)	

COMPLAINT

Complainant, PEOPLE OF THE STATE OF ILLINOIS, by KWAME RAOUL, Attorney General of the State of Illinois (“Complainant”), complains of Respondent, A & R CUSTOM CHROME PLATING LLC, an involuntarily dissolved Illinois limited liability company, as follows:

COUNT I
FAILURE TO TIMELY SUBMIT COMPLETE AND ACCURATE
2024 ANNUAL EMISSIONS REPORT

1. This Count is brought on behalf of the PEOPLE OF THE STATE OF ILLINOIS, by KWAME RAOUL, Attorney General of the State of Illinois, on his own motion and at the request of the Illinois Environmental Protection Agency (“Illinois EPA”), against A & R Custom Chrome Plating, LLC (“Respondent”), an involuntarily dissolved Illinois limited liability company, pursuant to Section 31 of the Illinois Environmental Protection Act (“Act”), 415 ILCS 5/31 (2024).

2. Illinois EPA is an administrative agency of the State of Illinois, created pursuant to Section 4 of the Act, 415 ILCS 5/4 (2024), and charged, *inter alia*, with the duty of enforcing the Act.

3. At all times relevant to this Complaint, Respondent was an Illinois limited liability company. Respondent was involuntarily dissolved on September 12, 2025.

4. At all times relevant to this Complaint, Respondent operated a metal plating business at 4556 West 62nd Street, Chicago, Cook County, Illinois, 60629 (“Facility”).

5. As of the date of filing of this Complaint, the Facility is located in an area of Environmental Justice (“EJ”) concern as identified using Illinois EPA EJ Start map.

6. At all times relevant to this Complaint, Respondent has operated a copper/nickel/decorative chrome electroplating line with fume suppressant containing wetting agent (“Electroplating Line”) at the Facility.

7. The Facility’s Electroplating Line is an emission unit capable of emitting particulate matter (“PM”) and chromium, a hazardous air pollutant (“HAP”).

8. On January 11, 2008, Illinois EPA issued Lifetime Operating Permit (“LOP”) 07120015 to Respondent for the Facility.

9. On July 28, 2025, Illinois EPA received Respondent’s annual emissions report (“AER”) for calendar year 2024, approximately 88 days after it was due on May 1, 2025.

10. Section 9(a) of the Act, 415 ILCS 5/9(a) (2024), provides as follows:

No person shall:

- (a) Cause or threaten or allow the discharge or emission of any contaminant into the environment in any State so as to cause or tend to cause air pollution in Illinois, either alone or in combination with contaminants from other sources, or so as to violate regulations or standards adopted by the Board under this Act.

11. Section 3.315 of the Act, 415 ILCS 5/3.315 (2024), provides the following definition:

“Person” is any individual, partnership, co-partnership, firm, company,

limited liability company, corporation, association, joint stock company, trust, estate, political subdivision, state agency, or any other legal entity, or their legal representative, agent or assigns.

12. Respondent, an involuntarily dissolved limited liability company, is a “person” as that term is defined in Section 3.315 of the Act, 415 ILCS 5/3.315 (2024).

13. Section 3.165 of the Act, 415 ILCS 5/3.165 (2024), provides the following definition:

“Contaminant” is any solid, liquid, or gaseous matter, any odor, or any form of energy, from whatever source.

14. PM and chromium, a HAP, are each a “contaminant” as that term is defined in Section 3.165 of the Act, 415 ILCS 5/3.165 (2024).

15. Section 201.302(a) of the Illinois Pollution Control Board (“Board”) Air Pollution Regulations, 35 Ill. Adm. Code 201.302(a), provides as follows:

The owner or operator of any emission unit or air pollution control equipment meeting the applicability criteria contained in 35 Ill. Adm. Code 254.102 shall submit to the Agency as a minimum, annual reports detailing the nature, specific emission units and total annual quantities of all specified air contaminant emissions; provided, however, that the Agency may require more frequent reports when necessary to accomplish the purposes of the Act and this Chapter.

16. Section 211.4370 of the Board Air Pollution Regulations, 35 Ill. Adm. Code 211.4370, contains the following definition:

“Owner or operator” means any person who owns, operates, leases, controls, or supervises a source, an emission unit or air pollution control equipment.

17. Respondent, as the operator of the Facility, is an “owner or operator” as that term is defined in Section 211.4370 of the Board Air Pollution Regulations, 35 Ill. Adm. Code 211.4370.

18. Section 211.1950 of the Board Air Pollution Regulations, 35 Ill. Adm. Code 211.1950, contains the following definition:

“Emission unit” means any part or activity at a stationary source that emits or has the potential to emit any air pollutant.

19. Section 211.6370 of the Board Air Pollution Regulations, 35 Ill. Adm. Code 211.6370, contains the following definition:

“Stationary source” means any building, structure, facility, or installation that emits or may emit any air pollutant.

20. Section 211.370 of the Board Air Pollution Regulations, 35 Ill. Adm. Code 211.370, contains the following definition:

“Air pollutant” means an air pollution agent or combination of such agents, including any physical, chemical, biological, radioactive (including source material, special nuclear material, and byproduct material) substance or matter which is emitted into or otherwise enters the atmosphere. Such term includes any precursors to the formation of any air pollutant, to the extent that the relevant statute or rule has identified such precursor or precursors for particular purpose for which the term "air pollutant" is used.

21. PM and chromium, a HAP, are each an “air pollutant” as that term is defined in Section 211.370 of the Board Air Pollution Regulations, 35 Ill. Adm. Code 211.370.

22. The Facility is a building, structure, facility, or installation and therefore a “stationary source” containing the Electroplating Line that emits or may emit air pollutants and is therefore an “emission unit” as those terms are defined in Sections 211.6370 and 211.1950 of the Board Air Pollution Regulations, 35 Ill. Adm. Code 211.6370 and 211.1950, respectively.

23. Section 254.102(b) of the Board Air Pollution Regulations, 35 Ill. Adm. Code 254.102(b), provides as follows:

Subpart C of this Part applies to the owner or operator of any source of regulated air pollutants required to have an operating permit in accordance

with 35 Ill. Adm. Code 201 that is not subject to subsection (a) of this Section.

24. Respondent has an operating permit, issued in accordance with Section 201 of the Board Air Pollution Regulations, 35 Ill. Adm. Code 201. Respondent therefore meets the applicability criteria contained in Section 254.102(b) of the Illinois EPA Air Pollution Regulations, 35 Ill. Adm. Code 254.102(b).

25. Section 254.132(a) of the Illinois EPA Air Pollution Regulations, 35 Ill. Adm. Code 254.132(a), provides as follows:

Failure to file a complete Annual Emissions Report by the applicable deadlines prescribed in Section 254.137(a) of this Subpart shall be a violation of this Part and 35 Ill. Adm. Code 201.302(a).

26. Section 254.137(a) of the Illinois EPA Air Pollution Regulations, 35 Ill. Adm. Code 254.137(a), provides as follows:

All Annual Emissions Reports are due by May 1 of the year following the calendar year in which the emissions took place.

27. Section 254.103 of the Illinois EPA Air Pollution Regulations, 35 Ill. Adm. Code 254.103, provides the following definition:

“Annual Emissions Report” means the information and certifications required by Subparts B and C of this Part, as applicable under Section 254.102(a) or (b) of this Subpart, and any additional requirements for submission with the Annual Emissions Report specifically imposed by the source’s permit.

28. Respondent, as the “owner or operator” of an “emissions unit,” is required pursuant to Section 201.302(a) of the Board Air Pollution Regulations, 35 Ill. Adm. Code 201.302(a), and Sections 254.132(a) and 254.137(a) of the Illinois EPA Air Pollution Regulations, 35 Ill. Adm. Code 254.132(a) and 254.137(a), to submit AERs to the Illinois EPA each year by May 1 for the following calendar year.

29. Respondent's AER for the Facility for calendar year 2024 was due by May 1, 2025.

30. Illinois EPA received the Facility's calendar year 2024 AER on July 28, 2025, approximately 88 days after May 1, 2025.

31. By failing to timely submit to Illinois EPA a complete and accurate calendar year 2024 AER for the Facility, Respondent violated Section 201.302(a) of the Board Air Pollution Regulations, 35 Ill. Adm. Code 201.302(a), and Section 254.132(a) of the Illinois EPA Air Pollution Regulations, 35 Ill. Adm. Code 254.132(a), and thereby violated Section 9(a) of the Act, 415 ILCS 5/9(a) (2024).

WHEREFORE, Complainant, PEOPLE OF THE STATE OF ILLINOIS, respectfully requests the Board enter an Order against Respondent, A & R CUSTOM CHROME PLATING, LLC, with respect to Count I:

1. Authorizing a hearing in this matter at which time Respondent will be required to answer the allegations herein;

2. Finding that Respondent violated Section 9(a) of the Act, 415 ILCS 5/9(a) (2024), and Section 201.302(a) of the Board Air Pollution Regulations, 35 Ill. Adm. Code 201.302(a), and Section 254.132(a) of the Illinois EPA Air Pollution Regulations, 35 Ill. Adm. Code 254.132(a);

3. Ordering Respondent to cease and desist from any further violations of Section 9(a) of the Act, 415 ILCS 5/9(a) (2024), Section 201.302(a) of the Board Air Pollution Regulations, 35 Ill. Adm. Code 201.302(a), and Section 254.132(a) of the Illinois EPA Air Pollution Regulations, 35 Ill. Adm. Code 254.132(a);

4. Assessing against Respondent, pursuant to Section 42(a) of the Act, 415 ILCS 5/42(a) (2024), a civil penalty of Fifty Thousand Dollars (\$50,000.00) for each violation of Section 9(a) of the Act, 415 ILCS 5/9(a) (2024), and Section 201.302(a) of the Board Air Pollution

Regulations, 35 Ill. Adm. Code 201.302(a), that occurred prior to June 16, 2025, and an additional civil penalty of Ten Thousand Dollars (\$10,000.00) for each day of each violation of the Act that continued prior to June 16, 2025;

5. Assessing against Respondent, pursuant to Section 42(a) of the Act, 415 ILCS 5/42(a) (2024),¹ a civil penalty of One Hundred Thousand Dollars (\$100,000.00) for each violation of Section 9(a) of the Act, 415 ILCS 5/9(a) (2024), and Section 201.302(a) of the Board Air Pollution Regulations, 35 Ill. Adm. Code 201.302(a), that occurred on and after June 16, 2025, and an additional civil penalty of Twenty-Five Thousand Dollars (\$25,000.00) for each day during which the violations continued on and after June 16, 2025, with an annual increase on July 1st of each subsequent year calculated pursuant to Section 42(1) of the Act, 415 ILCS 5/42(1) (2024);

6. Taxing all costs in this action, including, but not limited to, attorney, expert witness and consultant fees against Respondent; and

7. Granting such other relief as the Board deems appropriate and just.

[THIS SPACE INTENTIONALLY LEFT BLANK]

¹ On June 16, 2025, the State of Illinois enacted Public Act 104-006, which amended Section 42(a) of the Act, 415 ILCS 5/42(a), to change the maximum penalty amounts under that section to \$100,000 per violation and \$25,000 per day each violation continues. Pub. Act 104-006 (eff. June 16, 2025), § 5-35. The amendment provides for these amounts to be increased annually based on the consumer price index. Id. The amendment took effect immediately. Pub. Act 104-006, § 99-99.

PEOPLE OF THE STATE OF ILLINOIS,
by KWAME RAOUL, Attorney
General of the State of Illinois,

MATTHEW J. DUNN, Chief
Environmental Enforcement/
Asbestos Litigation Division

By: /s/ Stephen J. Sylvester
STEPHEN J. SYLVESTER, Chief
Environmental Bureau
Assistant Attorney General

Of Counsel:
Taylor Desgrosseilliers
Assistant Attorney General
Environmental Bureau
115 S. LaSalle Street, 23rd Floor
Chicago, Illinois 60603
(773) 505-5288
t.desgrosseilliers@ilag.gov