



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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JB PRITZKER, GOVERNOR

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(217) 782-5544
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Don Brown
Clerk
Illinois Pollution Control Board
100 West Randolph Street, Suite 11-500
Chicago, Illinois 60601

Re: Notice of Provisional Variance Approval - Land

Dear Mr. Brown:

Pursuant to Subsection 37(b) of the Illinois Environmental Protection Act (415 ILCS 5/37(b)), attached is a copy of the Illinois EPA's recent approval of an application for provisional variance. As you know, the Board must maintain for public inspection copies of all provisional variances filed with it by the Illinois EPA. If you have any questions, please do not hesitate to contact me.

Sincerely,

Charles W. Gunnarson by *Michael Roubicek*

Charles W. Gunnarson
Chief Legal Counsel

Enclosure

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

August 7, 2022

In re:)
)
)
ZF Group,) (Provisional Variance – Land)
Petitioner.)
)
)

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

ZF Group
Electronics and ADAS Division
ZF Active Safety and Electronics US LLC
Attn: Ward A Litchfield, CSP
Environmental, Health and Safety Manager
902 South 2nd Street
Marshall, IL 62441

Dear Mr. Litchfield:

The Illinois Environmental Protection Agency (“Illinois EPA”) has reviewed your July 27, 2022 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:

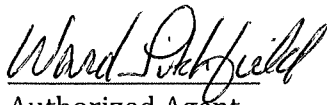
1. Unforeseen circumstances that resulted in this request is due to the designated facility, USEPA ID # IND00646943 located in East Chicago, Indiana failed to inform the ZF Group of their new Terms and Conditions until a Transporter request was submitted. The new stipulations prevent shipment of regulated hazardous waste within the accumulation time limit.
2. ZF Group needs to approve a new hazardous waste vendor and have the waste profiles approved.
3. The 90-day accumulation period for various wastes is August 8, 2022.
4. This is a one-time extension due to the need for a new vendor.

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.

ZF Group shall sign a certificate of acceptance of this provisional variance and return it to Melanie A. Jarvis #21 at 1021 North Grand Avenue East, P.O. Box 19276, Springfield, Illinois 62794-9276 or via email, melanie.jarvis@illinois.gov on or before August 7, 2022. The certification should take the following form:

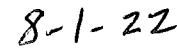
ZF Group hereby accepts and agrees to be bound by all terms and conditions of the provisional variance granted by the Illinois EPA on August 7, 2022.



Authorized Agent



Title



Date

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,



Charles W. Gunnarson
Chief Legal Counsel
Illinois EPA

Jarvis, Melanie

From: Litchfield Ward MRS UEUS <Ward.Litchfield@zf.com>
Sent: Wednesday, July 27, 2022 1:12 PM
To: Jarvis, Melanie
Subject: [External] RE: 30 day Provisional Variance

End date is August 8. My apologies for not including that information in the request.

Kind regards,
Ward A. Litchfield, CSP

Environmental, Health and Safety Manager

ZF Group

Electronics & ADAS Division
ZF Active Safety and Electronics US LLC
902 South 2nd Street, Marshall, IL 62441 USA
Phone: +1 217.826.1678, Fax: +1 217.826.1679
ward.litchfield@zf.com

From: Jarvis, Melanie <Melanie.Jarvis@Illinois.gov>
Sent: Wednesday, July 27, 2022 12:31 PM
To: Litchfield Ward MRS UEUS <Ward.Litchfield@zf.com>
Subject: 30 day Provisional Variance

Mr. Litchfield:
Your provisional variance request was forwarded to me. What is the end date of your accumulation period? Thank you. Melanie Jarvis



Melanie A. Jarvis
Deputy Chief Counsel – Land Enforcement
Illinois Environmental Protection Agency
1021 North Grand Avenue East
Springfield, Illinois 62794-9276
Office: 217-782-2893 | Fax: 217-782-9807
Melanie.Jarvis@Illinois.gov

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Jarvis, Melanie

From: Jennings, James M.
Sent: Wednesday, July 27, 2022 6:55 AM
To: Jarvis, Melanie
Subject: FW: EPA ID Number - ILD005476700 SQG Request for Extended Accumulation Period

Follow Up Flag: Follow up
Flag Status: Flagged

Hi Melanie,

Passing along the provisional variance request below.

Thanks!
 James

From: Litchfield Ward MRS UEUS <Ward.Litchfield@zf.com>
Sent: Wednesday, July 27, 2022 4:50 AM
To: Jennings, James M. <James.M.Jennings@illinois.gov>
Subject: [External] EPA ID Number - ILD005476700 SQG Request for Extended Accumulation Period
Importance: High

Mr. Jennings,

This location EPA ID Number - ILD005476700 SQG is requesting that a provisional variance be granted to extend the permissible accumulation period under 35 IAC 722.116(d) to allow up to 30 additional days of accumulation due to unforeseen circumstance.

The Designated Facility U.S. EPA ID Number IND000646943 located in East Chicago, IN (distance 189 miles) failed to inform this Generator of their new Terms & Conditions until a Transporter request was submitted. Their new commercial Terms & Conditions stipulations prevent shipment of regulated hazardous waste within the accumulation time limit. ZF is forced to approve a new hazardous waste vendor and profile our wastes to a new location. The RCRA Hazardous Waste affected are:

Waste Stream Description	5g	15g	30g
Dee Blast Wash Water - UN3082 WASTE ENVIRONMENTALLY HAZARDOUS SUBSTANCES, LIQUID, N.O. (Lead) 9 I RQ (D008)			
Rags With Isopropanol - UN3175 WASTE SOLIDS CONTAINING FLAMMABLE LIQUID, N.O.S. (LEAD, MEK) 4.1 II RQ(D001,D008)			
Toluene & Conformal Coating - UN1993 WASTE FLAMMABLE LIQUIDS, N.O.S. (TOLUENE, XYLENE) 3 II RQ(D001,F003)			
Rags With Oil and Water - NON-REGULATED MATERIAL (VERMICULITE)			
Silicon Coating - NON-REGULATED MATERIAL (VERMICULITE)			

Techsil Adhesive - UN3082 ENVIRONMENTALLY HAZARDOUS SUBSTANCE, LIQUID, N.O.S. (ALUMINUM NITRIDE, ALUMINUM OXIDE) 9 III			
Cooling Tower Water / Glycol - NON-REGULATED MATERIAL			
Mach 73 Descaler - UN3265 WASTE CORROSIVE LIQUID, ACIDIC, ORGANIC, N.O.S. (GLYCOLIC ACID) 8 III RQ (D002)			
Showcase Floor Wax - NON DOT / NON RCRA REGULATED MATERIAL	2		

Please contact me if you questions regarding this request or need additional information.

Kind regards,
Ward A. Litchfield, CSP

Environmental, Health and Safety Manager

ZF Group

Electronics & ADAS Division
ZF Active Safety and Electronics US LLC
902 South 2nd Street, Marshall, IL 62441 USA
Phone: +1 217.826.1678, Fax: +1 217.826.1679
ward.litchfield@zf.com

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