

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

CHEM-PLATE INDUSTRIES, LLC,	)	
Petitioners,	)	
	)	
v.	)	PCB 26- 52
	)	(Permit Appeal – RCRA)
ILLINOIS ENVIRONMENTAL PROTECTION	)	
AGENCY,	)	
Respondent.	)	

NOTICE OF ELECTRONIC FILING

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

Melanie A. Jarvis
Deputy Chief Counsel – Land Enforcement
Division of Legal Counsel
P.O. Box 19276
Springfield, Illinois 62794-9276
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PLEASE TAKE NOTICE that on July 13, 2026, **Chem-Plate Industries, LLC** electronically filed with the Office of the Clerk of the Illinois Pollution Control Board the APPEARANCE OF PHILIP L. COMELLA, APPEARANCE OF ANN M. ZWICK, and PETITION FOR REVIEW OF ILLINOIS EPA FINAL DECISION, a copy of which is hereby served upon you.

/s/ Ann M. Zwick
Ann M. Zwick

Dated: July 13, 2026

Philip L. Comella
Ann M. Zwick
Taft Stettinius & Hollister LLP
111 E. Wacker Dr. #2600
Chicago, IL 60601
(312) 836-4133
pcomella@taftlaw.com
azwick@taftlaw.com

CERTIFICATE OF E-MAIL SERVICE

The undersigned attorney certifies that she served a copy of the foregoing NOTICE OF ELECTRONIC FILING, APPEARANCE OF PHILIP L. COMELLA, APPEARANCE OF ANN M. ZWICK, and PETITION FOR REVIEW OF ILLINOIS EPA FINAL DECISION, to the above-listed parties, by sending a copy to the email addresses designated above on or before 4:30 p.m. on July 13, 2026.

/s/ Ann M. Zwick

One of the Attorneys for Chem-Plate
Industries, LLC

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APPEARANCE

I hereby file my appearance in this proceeding, on behalf of Chem-Plate Industries, LLC.

/s/ Philip L. Comella

Philip L. Comella

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/s/ Ann M. Zwick

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ILLINOIS ENVIRONMENTAL PROTECTION	)	
AGENCY,	)	
Respondent.	)	

PETITION FOR REVIEW
OF ILLINOIS EPA FINAL DECISION

NOW COMES Petitioner Chem-Plate Industries, LLC (“Petitioner” or “Chem-Plate”), by its attorneys, and pursuant to Section 40(a)(1) of the Illinois Environmental Protection Act (“Act”) (415 ILCS 5/40(a)(1)) and 35 Ill. Adm. Code §§105.200 et. seq., petitions the Illinois Pollution Control Board (“Board”) for a review of the Illinois Environmental Protection Agency’s (“Illinois EPA”) final decision on a closure plan modification request pertaining to remedial activities at Petitioner’s facility located at 30 N. 8th Ave, Maywood, Illinois (“Facility”). In support thereof, Petitioner states as follows:

I. BACKGROUND

1. On December 29, 2025, Ramboll Americas Engineering Solutions, Inc., on behalf of Petitioner, submitted a response to an August 8, 2025 letter from the Illinois EPA regarding a RCRA Closure Plan Addendum. (Exhibit A).

2. On March 3, 2026, Illinois EPA issued a letter to Petitioner in response to the December 29, 2025 submittal, stating that it viewed the submittal as a modification to the approved closure plan and that the agency cannot approve it for reasons listed in the letter (“Final Decision”). (Exhibit B).

3. The Final Decision states it is a final decision subject to appeal to the Board.
4. On April 7, 2026, Petitioner and Illinois EPA timely filed a notice to extend the 35-day period within which Petitioner may appeal the Final Decision. (Exhibit C).
5. By its Order dated April 16, 2026, the Board granted the extension request to allow Petitioner until July 13, 2026 to timely file an appeal of the Final Decision. (See PCB 26-52 Order (April 16, 2026)). This appeal is timely filed.

II. ISSUES ON APPEAL
(35 Ill. Adm. Code §105.210(c))

A. Illinois EPA Condition 1 – Soil Saturation Limit

6. Illinois EPA provided the following Condition 1 in its Final Decision:

Illinois EPA reviewed data submitted under Log No C-658-M-5, dated July 25, 1997, which indicate that trichloroethylene (TCE) and tetrachloroethylene (PCE) were present at concentrations exceeding the soil saturation limit. In accordance with 35 IAC 742.305, no exposure route may be excluded from consideration while contaminant concentrations exceed the applicable soil saturation limit.

(Exhibit B at p. 2, ¶ 1).

7. Petitioner objects to Condition 1 because Illinois EPA's statement that concentrations of TCE and PCE exceed applicable soil saturation limits is contrary to law, unsupported by substantial evidence, and arbitrary and capricious.

8. There is no default soil saturation concentration for the indoor air inhalation pathway as the values are based on groundwater concentrations and shallow groundwater is not present.

9. The default soil saturation concentration for the outdoor air inhalation pathway for TCE and PCE, which is a similar exposure pathway is based on the default surface soil fraction of organic carbon content (Foc) of 0.6 and results in 1,200 mg/kg and 800 mg/kg, respectively. The

highest concentrations of TCE and PCE detected in shallow soils were 0.0101 mg/kg and 0.180 mg/kg, respectively.

10. The maximum concentrations of TCE (1,100 mg/kg collected from 8 to 9 feet below ground surface [bgs] at location C6) and PCE (649 mg/kg collected from 8 to 10 feet bgs at location C23) were detected in samples collected from subsurface soils at depths greater than 3 feet bgs. Illinois EPA's Site Remediation Program issued a No Further Remediation letter for a Vandelay Holdings, LLC property (LPC #03118658446) located approximately 300 feet northwest of the Facility where a site-specific Foc value of 0.96% was used to develop remediation objectives. This Foc value was obtained from a sample collected from a depth of 6 feet below ground surface that was non-detect for VOCs and SVOCs. Petitioner believes this value is acceptable for use at the Facility given the sites are located within a few hundred feet of each other and the shallow geology of both sites consists of similar clay-rich glacial tills.

11. Using the 0.96% Foc value, the site-specific soil saturation limits for TCE and PCE calculated using TACO Equation S29 are 1,793 mg/kg and 1,264 mg/kg, respectively (calculation included as Exhibit D). These concentrations are significantly higher than the maximum concentrations detected at the Facility almost 30 years ago. As Illinois EPA has noted, these compounds degrade in the environment and the concentrations are likely lower than originally detected.

B. Illinois EPA Condition 2 – Degradation of TCE and PCE

12. Illinois EPA provided the following Condition 2 in its Final Decision:

Some of the original contamination may have naturally degraded over time; however, the degradation of PCE and TCE can produce vinyl chloride, a daughter product that poses greater risk to human health and the environment than the parent compounds.

(Exhibit B at p. 2, ¶ 2).

13. Petitioner objects to Condition 2 because Illinois EPA's statement that vinyl chloride produced by the degradation of PCE and TCE poses a greater risk to human health and the environment than PCE and TCE at the site is contrary to law, unsupported by substantial evidence, and arbitrary and capricious.

14. Petitioner is unaware of a situation where vinyl chloride was generated from the degradation of PCE and TCE at such a level that its concentration exceeded soil saturation limits.

15. Further, the default and site-specific soil saturation limits for vinyl chloride (i.e., 2,600 mg/kg and 3,941 mg/kg, respectively) are higher than those of TCE and PCE.

16. Petitioner believes it would be physically impossible for vinyl chloride to be generated to the extent that it would exceed soil saturation limits through degradation.

17. Therefore, given that the soil component of groundwater ingestion has already been excluded by Illinois EPA (See Illinois EPA Condition 4 (Exhibit B, p. 2, ¶ 4)), the use of engineered barriers and a vapor mitigation system on any new structures at the Facility eliminates the remaining pathways, resulting in no unacceptable risk to potential future site occupants.

C. Illinois EPA Condition 3 - Indoor Air Inhalation Pathway

18. Illinois EPA provided the following Condition 3 in its Final Decision:

In 2013, the indoor inhalation exposure route was added to 35 IAC Part 742. The most recent soil investigation at this facility did not evaluate this pathway; therefore, Illinois EPA requires evaluation of the indoor inhalation exposure route prior to completion of RCRA closure. Although demolition of the existing structure would typically render this pathway incomplete, contaminant concentrations exceeding the soil saturation limit, and potentially the soil vapor saturation limit, prevent exclusion of this pathway.

(Exhibit B at p. 2, ¶ 3).

19. Petitioner objects to Condition 3 because Illinois EPA's requirement to further investigate the indoor air inhalation pathway is contrary to law, unsupported by substantial evidence, and arbitrary and capricious.

20. Given that soil saturation limits for surface soil based on default Foc values and site-specific soil saturation limits for subsurface soil based on an Illinois EPA-approved Foc value from a nearby site are greater than any of the concentrations detected at the Facility (*see* Paragraphs 10 and 11 above), the indoor air inhalation pathway can be excluded by demolition of the current unoccupied building and the requirement for a vapor mitigation system in future habitable structures.

D. Illinois EPA Condition 5(h) – Off-Site Route

21. Illinois EPA provided the following Condition 5(h) in its Final Decision:

5. Within 60 days of the date of this letter, submit a work plan addressing the concerns identified in Conditions 1-3. The work plan must include:

* * * * *

h. a plan for addressing the indoor inhalation exposure route to the affected off-site property located at 15 North 9th Avenue, Maywood, Illinois.

(Exhibit B at p. 3, ¶ 5(h)).

22. Petitioner objects to Condition 5(h) because Illinois EPA's requirement that a work plan must address the indoor inhalation exposure route to the noted neighboring property is contrary to law, unsupported by substantial evidence, and arbitrary and capricious.

23. Extensive soil sampling demonstrates that the concentrations of the chlorinated volatile organics in soils were delineated and are not located within 30 feet of any structure on the neighboring property and no shallow groundwater was identified at the Facility. Because the

contaminants are not under or immediately adjacent to the structures, the shallow subsurface geology consists of relatively impermeable, clay-rich glacial tills, and shallow groundwater is documented not to be present, there are no risks associated with the indoor air inhalation pathway to the neighboring property.

E. Illinois EPA Condition – Financial Assurance

24. Illinois EPA provided the following Condition 6 in its Final Decision:

Chem-Plate does not have a current cost estimate and financial assurance for closure activities as required by 35 IAC 725.242-243. With the work plan described in Condition 5, submit a cost estimate for the activities required to complete RCRA closure. Chem-Plate must establish financial assurance for the estimated amount within 60 days of Illinois EPA's approval of the cost estimate in accordance with 35 IAC 725.243.

(Exhibit B at p. 3, ¶ 6).

25. Petitioner objects to Condition 6 because Illinois EPA's requirement that a cost estimate and financial assurance be provided is contrary to law, unsupported by substantial evidence, and arbitrary and capricious.

26. Illinois EPA previously determined that it would not require financial assurance. See the attached Illinois EPA, Bureau of Land, Financial Records Review dated October 29, 2020. ("No action will be taken at this time in regards to Financial assurance.") (Exhibit E).

27. Illinois EPA appears to have changed positions and is now requiring a cost estimate and financial assurance for closure activities. Petitioner reasonably relied on Illinois EPA's prior determination that financial assurance was not required.

28. The law does not require RCRA closure of this Facility and Illinois EPA has discretion not to require a cost estimate or financial assurance.

29. Petitioner acknowledges that it agreed to perform a RCRA-compliant closure of a container storage area in a 1999 Consent Order. However, Petitioner asserts that it was never, and is not, an operating RCRA facility and, therefore, the Consent Order was improper to begin with.

30. Petitioner asserts that the allegations underlying the Consent Order related to Petitioner's generation of hazardous waste that it allowed to be staged for more than 90 days prior to removal for off-site disposal. However, exceeding the 90-day storage limit does not mean the Facility is a RCRA facility; it just means the Facility violated the generator requirements. *See In Re: M.A. Bruder and Sons, Inc. D/B/A M.A.B. Paints*, 10 E.A.D. 598 (EPA), 2002 WL 1493844 at *10 (holding that a generator that temporarily lost its eligibility for the 90-day generator exemption is not a "real" TSD facility and, for penalty purposes, the case should not have been viewed as a failure to obtain a TSD permit but as one involving a generator that failed to comply "with the requirements necessary to qualify for the generator exemption").

31. Because Petitioner was never an operating RCRA facility, it is not subject to financial assurance under the hazardous waste rules at 35 IAC 725.242 and 243, which only apply to owners and operators of "hazardous waste facilities." *See* 35 Ill. Adm. Code 725.240(a).

32. Illinois EPA has the discretion and authority to retract the cost estimate and financial assurance requirements and other RCRA-specific closure requirements.

WHEREFORE, for the reasons stated above. Chem-Plate requests that the Board (1) find the Final Decision to be void as a matter of law; (2) remand the Final Decision for reissuance consistent with the Act, Board regulations and Petitioner's arguments above, and (3) grant Petitioner such other and relief as appropriate.

Respectfully submitted,

CHEM-PLATE INDUSTRIES, LLC

By: /s/ Ann M. Zwick
One of Its Attorneys

Dated: July 13, 2026

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EXHIBIT A



ENVIRONMENT
& HEALTH

Behzad Feda
Environmental Engineer
Illinois Environmental Protection Agency
2520 West Iles Ave
Springfield IL 62704
behzad.feda@illinois.gov

RE: 0311835009 -- Cook County
Chem-Plate Industries Inc
ILD0006653 72
Log No C-658-M-1
RCRA Closure - 24B
Permit Closure Final Action

Dear Behzad:

December 29, 2025

This letter has been prepared in response to the August 8, 2025 IEPA letter regarding the February 29, 2024 RCRA Closure Plan Addendum submitted by Ramboll Americas Engineering Solutions (Ramboll) on behalf of Chem-Plate Industries Inc. (Chem-Plate). IEPA's letter included 6 comments, which are addressed on a point-by-point basis below with the IEPA's comments in bold and Chem-Plate's response immediately following. As we discussed during our October 31, 2025 call with IEPA, due to ownership/organizational changes within Chem-Plate, many of the original documents that were submitted to IEPA, as well as IEPA's responses were not available to Chem-Plate. In response to a Freedom of Information Act request submitted on October 31, 2025, Chem-Plate was provided with much of the missing correspondence from IEPA, but very few of the report submittals from Chem-Plate. As such, our responses are based on the information that we have available.

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A copy of the LPC-PA18 form is included in Attachment 1. Figures showing the existing soil sampling locations and the approved engineered barrier locations are included in Attachment 2. A completed site inspection form for the existing engineered barriers is included in Attachment 3.

1. In 2013, the indoor inhalation exposure route was added to Title 35 Illinois Administrative Code (35 IAC) Part 742, Subpart C. In accordance with 35 IAC 725.211, Chem-Plate must assess the indoor inhalation exposure route. Exclusion of the indoor inhalation exposure route must be achieved before RCRA closure can be completed. A work plan for investigating soil gas must be submitted within 60 days of the date of this letter, and it must include:

- a. background information about the facility;
- b. the goals and objective of the sampling effort;
- c. drawings showing the horizontal and vertical boundaries of the contaminant plume(s) existing at the site;
- d. a list of analytes, which must include any volatile organic compound that has been detected at this site;
- e. a scaled map showing the locations where samples will be collected;



- f. a description of the quality control/ quality assurance procedures that will be utilized during sampling;
- g. a description of the sampling procedures; and
- h. a description of how waste generated by sampling will be handled.

The building is currently used to store parts by a former tenant but will soon have no regular occupants. As such, there is currently only a minimal risk to the occasional worker that may enter the building to obtain parts. Given the lack of a future use of the building, there is no current realized exposure to volatile organic compounds (VOCs) that may be present in the indoor air within the building as a result of residual subsurface impacts. Rather than expend its remaining and extremely limited resources to assess and potentially mitigate vapors, Chem-Plate intends to demolish the above grade structure, leaving only the floor slab in-place. Chem-Plate will also implement an Environmental Land Use Control (ELUC) requiring the installation of a vapor mitigation system or vapor barrier for any future occupiable structures constructed within 50 feet of the identified area of contamination. As discussed in our response to Comments 2 and 4, Chem-Plate will repair deficiencies in the engineered barrier upon completion of the demolition.

2. **In previous Illinois EPA letters, the establishment of engineered barriers over contaminated soil was approved and deemed sufficient to exclude certain exposure routes under 35 IAC Part 742. However, that determination was made with the assumption that the engineered barriers would be effectively maintained. Chem-Plate has not maintained the engineered barriers and has not yet closed the hazardous waste management unit. Therefore, it is necessary to assess the current conditions of contaminated soils beneath the barriers to meet the requirements of 35 IAC Part 742 before certifying closure. In addition, Illinois EPA does not consider engineered barriers sufficient to exclude the soil component of the groundwater ingestion exposure route. Within 60 days of the date of this letter, submit a work plan for investigating the current conditions of any remaining contamination at the site to evaluate and to determine if further remediation is necessary in accordance with the requirements of 35 IAC Part 742.**

Chem-Plate respectfully disagrees with IEPA's request for additional investigations. As the IEPA is aware, facility operations ceased in 1995, and all relevant chemicals were removed from the building shortly thereafter. The contamination is under the interior building slab. As discussed on page 15 of the Terra Nova Research, Inc. Subsurface Exploration and Analytical Testing Report dated August 15, 1994, investigations failed to identify groundwater in any of the borings, the deepest of which extended to 25 feet below ground surface. This was corroborated by regional geological studies. See for example, the TechLaw, Inc. Preliminary Assessment/Visual Site Inspection Report (the "PA/VSI") dated April 29, 1998, which stated on page II-5 that "ISWS data indicates the shallowest well in the area had a completed depth of 72 feet below ground surface...[which was] used as the depth to groundwater." Testing of the gray clay underlying the site indicates that its permeability ranges from 9.84×10^{-9} to 1.23×10^{-8} cm/sec indicating that the clay is extremely impermeable. The highest concentrations of VOCs detected at the property are inside the northwest corner of the building where the former hazardous waste storage area was located. While there are some shallow cracks in building floor, soil has never been exposed in the building and the roof has prevented water from percolating into the soils and causing migration from the residual source material. While the exterior engineered barriers are in less-than-desirable condition, pavement is still present in the loading dock area and robust pavement is present within the alley. A 2022 RCRA inspection report by IEPA noted that the interior floor "had some cracks and chips which may need to be addressed depending on if they compromise the purpose of the barrier". The inspection noted that they alley appeared to be in good condition, but "the barrier between the alley and the building appeared to possibly need refinishing or repair." It also noted a section of gravel that did not appear to be adequate as an engineered barrier. It concluded that "some maintenance is needed for the engineered barrier outside directly west of the building." Chem-Plate notes that the "section of gravel"



noted in the report is approximately 4 feet wide and it is unknown whether there is asphalt under it. Also, there is no indication that groundwater is used as a potable source at or in the vicinity of the site. Page II-5 of the PA/VSI states that: "drinking water supplies for the area are obtained from Lake Michigan." In addition, there is a current groundwater ordinance in place for Maywood prohibiting the installation or use of potable water supply wells in Maywood (Ordinance No. CO-99-30, accepted by IEPA on 4/26/2000, available at <https://webapps.illinois.gov/EPA/WebsiteApi/api/GroundwaterOrdinance/GetDocument?documentName=00042402.pdf>.)

Chem-Plate believes that IEPA's request for additional investigation is unnecessary for the following reasons:

- The highest concentrations of VOCs are beneath the building, which are protected from infiltration.
- Groundwater is not present within at least 25 feet of the ground surface.
- The underlying soils are extremely impermeable and, with the exception of the contamination present, would be acceptable for use as an engineered barrier.
- Chemicals have not been used or stored at the facility since approximately 1995.
- Engineered barriers have been present over most of the area with the exception of the small strip of gravel adjacent to the building under which it is unknown whether an engineered barrier exists. Chem-Plate understands that maintenance is needed and has been planning to conduct that maintenance since December 2024 when the last closure plan modification was submitted.
- There is currently a groundwater ordinance in place in Maywood.

As discussed above, it is Chem-Plate's intention to demolish the above-grade structures present at the site and establish an ELUC to address the vapor intrusion pathway. During demolition, any soils excavated in areas subject to the engineered barrier will be stockpiled on plastic within the area of concern and then replaced at the approximate same location and depth in accordance with RCRA requirements under OSWER Directive 9441.1922(16). After the demolition is complete, engineered barrier deficiencies will be addressed. Chem-Plate proposes to repair the engineered barriers after demolition because the heavy equipment and demolition processes may result in significant wear and tear on the surfaces. Thus, once the demolition debris is removed, the cracks in the concrete floor will be cleaned and sealed and the loading dock area leveled to grade and paved with a minimum of 6 inches of asphalt. Because of the weather, it will not be possible to asphalt the dock area until the spring of 2026.

In regard to IEPA's inquiry about the adjacent property during the October 31, 2025 call, Chem-Plate notes that IEPA approved an ELUC (recorded with the Cook County Recorder of Deeds on January 20, 2004 as Document Number 0402044036) that required installation and maintenance of an engineered barrier at the neighboring Megenbier property located to the west of the Chem-Plate facility in a March 31, 2004 letter. As a result, the IEPA determined no further remediation was necessary to address soil contamination on that property.

- 3. Chem-Plate did not submit the Illinois EPA form titled, "RCRA Interim Status Closure and Post-Closure Care Plans General Form (LPC-PA 18)," with original signatures in accordance with the requirements of 35 IAC 702.126. The LPC-PA18 form must be completed and must accompany all information submitted to Illinois EPA associated with closure activities. As noted on the form, two copies must accompany the original of all submittals, so that the information submitted can be distributed, as necessary, to Illinois EPA personnel and regional offices. The LPC-PA18 form and guidance to complete the form can be found on Illinois EPA's website.**

Chem-Plate notes this requirement and will include the form in all future submittals. This form is attached to this letter as Attachment 1.



4. **An integrity inspection of the engineered barriers by a qualified Illinois licensed professional engineer must occur within 30 days of the date of this letter. Submit the results of the integrity inspection with the work plan described in Condition 1.**

An integrity inspection was conducted by an Illinois-licensed Professional Engineer (PE) on December 12, 2025 after receipt of the Freedom of Information Act materials from the IEPA. Attachment 3 includes a completed inspection form, signed by Illinois-licensed professional engineer. The interior inspection revealed some minor and moderate cracks in the concrete and some holes that appear to be related to concrete patch failing in old soil borings. A portion of the floor could not be observed because of the presence of pallets but will be inspected after removal of materials and demolition. The observed cracks did not appear to fully penetrate the slab, which was reported by the property owner to be approximately 6 inches thick. As discussed in our response to Comment 2, the cracks and holes will be cleaned and sealed after all of the interior materials are removed and the building demolished. Significant cracks were observed in the loading dock area and moderate cracks in the adjacent pavement. The visible portions of the alley were in good condition, with no observable cracks. After demolition, the loading dock area will be filled to match the exterior grade and covered with a 6-inch-thick asphalt cap. Because of snow cover, portions of the area could not be observed.

5. **Chem-Plate does not have a current cost estimate and financial assurance for closure activities as required by 35 IAC 725.242 and 725.243. With the work plan described in Condition I, submit a cost estimate for the activities required to complete closure of the hazardous waste container storage area. The detailed, itemized cost estimate must be based on the activities and procedures specified in the Chem-Plate's closure plan and the activities required by this letter. The estimate must be in current dollars for a third party to complete the work with 10% contingency cost. Financial assurance must be established for the approved estimated amount within 60 days of approval by Illinois EPA.**

Upon IEPA approval of Chem-Plate's approach, Chem-Plate will present a cost estimate to complete the remaining work that will include a 10% contingency.

6. **In view of the need for additional investigations, as described in this letter, the signing of the HAA with the Village of Maywood and the subsequent closure report should be postponed until Illinois EPA has determined the current conditions meet the requirements of 35 IAC Part 742. Based on the results of the investigations required by this letter, the HAA may need to be amended. Illinois EPA will inform Chem-Plate if a revised HAA is required.**

Given the presence of a robust pavement in the alley that acts as an engineered barrier and an existing Highway Authority Agreement that addresses potential exposure concerns, Chem-Plate has no concerns with not updating the Highway Authority Agreement until other matters are resolved.

Sincerely,

Ramboll Americas Engineering Solutions, Inc.

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Attachments

RAMBOLL

**ATTACHMENT 1
LPC-PA18 FORM**



Illinois Environmental Protection Agency

Bureau of Land • 1021 North Grand Avenue East • P.O. Box 19276 • Springfield • Illinois • 62794-9276

RCRA INTERIM STATUS CLOSURE AND POST-CLOSURE CARE PLANS GENERAL FORM

LPC-PA18

This Form Must Accompany Any Rcra Interim-status Closure And/or Post-closure Care Plans Or Modification Request Submitted To The Division Of Land Pollution Control. The Original And Two Copies Of All Documents Submitted Must Be Provided.

FACILITY IDENTIFICATION (Information about the facility where the units are located which are addressed in this closure plan submittal)

Name: Chem-Plate Industries, Inc.County: CookStreet Address: 30 N. 8th AvenueSite # (IEPA): 0311838009City: MaywoodSite No. (USEPA): ILD000665372

Owner Information

Name: Chem-Plate Industries, Inc.

Mailing Address:

1800 Touhy AveElk Grove Village, IL60007Contact Name: Aaron StrausContact Title: Executive Vice PresidentPhone #: 847-640-1600

Operator Information

Name: Chem-Plate Industries, Inc.

Mailing Address:

1800 Touhy AveElk Grove Village, IL60007Contact Name: Aaron StrausContact Title: Executive Vice PresidentPhone #: 847-640-1600

TYPE OF SUBMISSION (check applicable item and provide requested information, as applicable)

- ☐ Original (New) Closure Plan
☐ Original (New) Post-Closure Plan
☒ Response to Disapproval letter

Log No. of Most Recent Agency Approval/Disapproval Letter C-658-M-11Date of Most Recent Agency Approval/Disapproval Letter August 8 2025

- ☐ Modification Request
☐ Additional Information for _____ Submittal (Log No. _____ if known)
(enter date)

Does this submittal contain groundwater information?

YesNoNo

(IF YES, PLEASE INCLUDE ONE ADDITIONAL COPY OF SUBMITTAL)

Response to IEPA comments on RCRA Closure Plan Addendum dated February 29, 2024

LIST OF DOCUMENTS SUBMITTED: (identify all documents in this submittal, including the cover letter)

Response to comments letter

UNITS UNDERGOING CLOSURE (please identify what type of units are addressed in the plan, their capacities and whether they are on the RCRA Part A for the facility)

Unit	Unit Code	Number of Units Closing	Capacity	On Part A Y/N
<u>Storage:</u>				
Container (barrel, drum, etc.)	S01	1	NA	
Tank	S02			
Waste Pile	S03			
Surface Impoundment	S04			
<u>Treatment:</u>				
Tank	T01			
Surface Impoundment	T02			
Incinerator	T03			
Other (explain)	T04			
<u>Disposal:</u>				
Landfill	D80			
Land Application	D81			
Surface Impoundment	D83			

CERTIFICATION AND SIGNATURE (Must be completed for all submittals. Certification and signature requirements are set forth in 35 IAC 702.126. Any submittal involving engineering plans, specifications and calculations as defined in the Illinois Professional Engineering Practice Act (225 ILCS 325) and 68 Ill. Adm. Code 1380 must be signed and certified by an Illinois licensed professional engineer.)

All closure plans, post-closure plans and modifications must be signed by the person representing the owner/operator designated below or by a duly authorized representative of that person:

1. If the owner/operator is a Corporation - By a principal executive officer of at least the level of vice-president.
2. If the owner/operator is a Partnership or Sole Proprietorship - By a general partner or the proprietor, respectively.
3. If the owner/operator is a Government - By either a principal executive officer or a ranking elected official.

A person is a duly authorized representative only if:

1. the authorization is made in writing by a person described above; and
2. is submitted with this application (a copy of a previously submitted authorization can be used).

CERTIFICATION STATEMENT - I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Any person who knowingly makes a false, fictitious, or fraudulent material statement, orally or in writing, to the Illinois EPA commits a Class 4 felony. A second or subsequent offense after conviction is a Class 3 felony. (415 ILCS 5/44(h))

Owner Signature Aaron Straus

Date 12/26/25

Title Executive Vice President

Operator Signature Aaron Straus

Date 12/26/25

Title Executive Vice President

Engineer Signature Angela E. DeDolph
(if necessary)

Date 12/29/2025

Engineer Name Angela DeDolph

Engineer Seal

Engineer Address 333 West Wacker, Suite 1050
Chicago, IL 60606

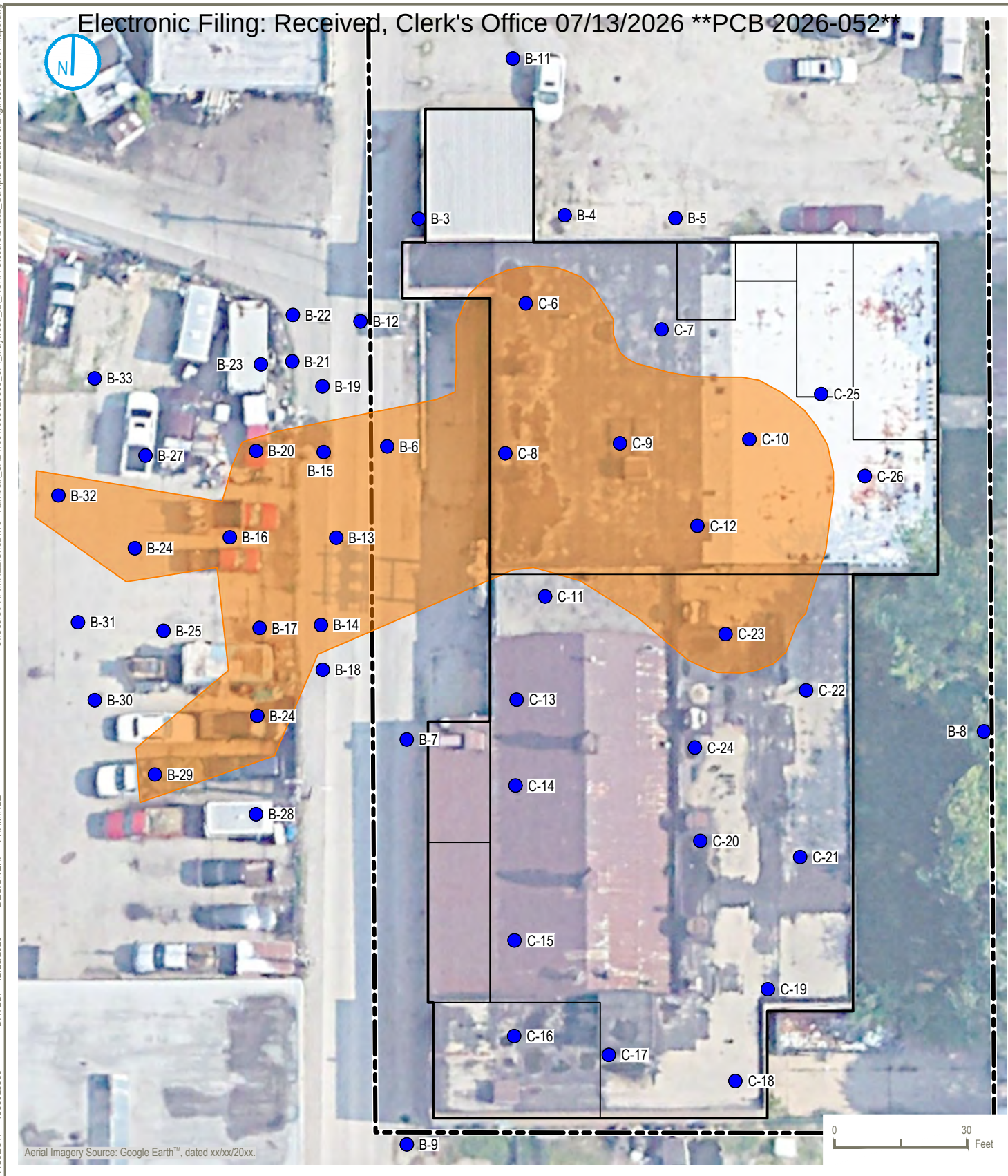
Engineer Phone # 312-288-3816

JM:bjh\97763i.doc



RAMBOLL

**ATTACHMENT 2
FIGURES**



--- PROPERTY BOUNDARY (APPROXIMATE)



CHLORINATED VOC IMPACTS

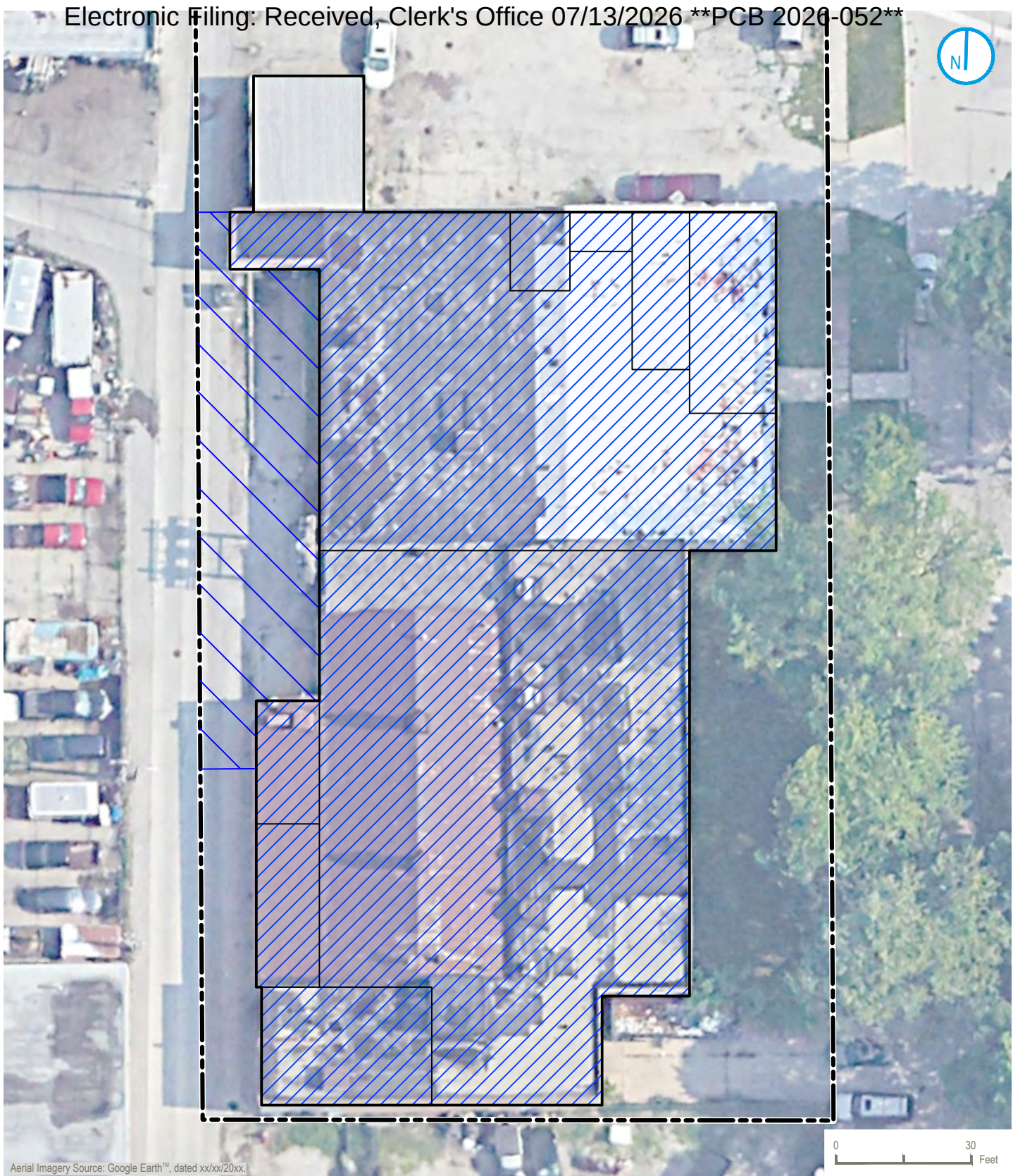
SAMPLE LOCATION MAP

FIGURE 01

CHEM-PLATE INDUSTRIES, INC. FACILITY
30 NORTH 8th AVENUE
MAYWOOD, ILLINOIS

RAMBOLL AMERICAS
ENGINEERING SOLUTIONS, INC.
A RAMBOLL COMPANY

RAMBOLL

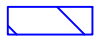


Aerial Imagery Source: Google Earth™, dated xx/xx/20xx.

----- PROPERTY BOUNDARY (APPROXIMATE)



INTERIOR FLOOR



ASPHALT/CONCRETE PAVEMENT

ENGINEERED BARRIER MAP

FIGURE 02

CHEM-PLATE INDUSTRIES, INC. FACILITY
30 NORTH 8th AVENUE
MAYWOOD, ILLINOIS

RAMBOLL AMERICAS
ENGINEERING SOLUTIONS, INC.
A RAMBOLL COMPANY





ATTACHMENT 3
ENGINEERED BARRIER INSPECTION FORM

**Engineered Barrier Inspection Form
Chem-Plate Industries, Inc. Facility
30 North 8th Avenue, Maywood, Illinois**

Inspector(s)/Signature	Angela DeDolph, P.E. <i>Angela E. DeDolph</i>
Date/Time of Inspection	December 12, 2025/10:00 am
Company	Ramboll Americas Engineering Solutions, Inc.
Registration Number	062.054572
License Expiration Date	November 30, 2027
Professional Engineer Stamp	 A circular professional engineer stamp for the State of Illinois. The outer ring contains the text 'LICENSED PROFESSIONAL ENGINEER' at the top and 'STATE OF ILLINOIS' at the bottom, separated by two stars. The center of the stamp contains the name 'ANGELA E. DEDOLPH' and the license number '062054572'.
Interior Building Floor	
Condition of Building Floor	• Pallets and materials were stored in portions of building, which limited the ability to observe the floor condition in those areas. • Property owner reported that the floor slab is 6 to 8 inches thick. • The visible portions of the floor in the northeastern portion of the building were in good condition; cracks were minimal and appeared shallow. • The visible portions of the floor in the northwestern and southern portions of the building contained some moderate cracks and holes. The cracks did not appear to penetrate the full depth of the slab, but many were filled with dirt/debris.
Summary of Locations where Repairs Needed	• Property owner plans to clear remaining pallets and storage. • When building is empty, floors will be cleaned using a power broom or equivalent. • Cracks and holes in the northwestern and southern portions of the building will be filled. If significant cracks or holes are observed in the northeastern portion of the building after floor cleaning, those will be filled as well.
Description of and Date Repairs Performed	• Not yet completed; work to be completed once stored materials are removed and floor is fully accessible.

**Engineered Barrier Inspection Form
Chem-Plate Industries, Inc. Facility
30 North 8th Avenue, Maywood, Illinois**

Exterior Areas	
Condition of Alley	• Due to recent snowfall, portions of the alley were snow covered. • The visible portions of the alley were in good condition with no observed cracks.
Condition of Exterior Paved Areas	• Due to recent snowfall, portions of the exterior paved area were snow covered. • The loading dock area had significant cracks. • Exterior asphalt had moderate cracks.
Summary of Locations where Repairs Needed	• Property owner plans to fill the loading dock area to bring it to grade and remove the portions of the retaining wall that area elevated above the surrounding grade. • Once the loading dock area is filled and the elevated portions of the retaining wall removed, the western portion of the property covered by the exterior portion of the engineered barrier will be paved between the alley and the building.
Description of and Date Repairs Performed	• Not yet completed; work will be scheduled pending weather conditions appropriate for asphalt paving.

**Engineered Barrier Inspection Photographs
Chem-Plate Industries, Inc. Facility
30 North 8th Avenue, Maywood, Illinois**

Date of Inspection: December 12, 2025



Photo 1: Interior Floor – view to the east of the northeastern portion of the building; visible portions of floor are in good condition with minimal shallow cracks.



Photo 2: Interior Floor – view of the floor in the northwest portion of the building adjacent to the loading dock area with cracks and holes.

**Engineered Barrier Inspection Photographs
Chem-Plate Industries, Inc. Facility
30 North 8th Avenue, Maywood, Illinois**

Date of Inspection: December 12, 2025



Photo 3: Interior Floor – view to the south of the floor in the southern portion of the building with a crack partially filled in.



Photo 4: Interior Floor – view to the east of the floor in the southeast portion of the building with cracks needing repair.

**Engineered Barrier Inspection Photographs
Chem-Plate Industries, Inc. Facility
30 North 8th Avenue, Maywood, Illinois**

Date of Inspection: December 12, 2025



Photo 5: Alley – visible portions of alley are covered with concrete in good condition.



Photo 6: Exterior Paved Area – loading dock and adjacent asphalt pavement have cracks.

EXHIBIT B



Illinois Environmental Protection Agency

2520 West Iles Avenue • P.O. Box 19276 • Springfield, Illinois • 62794-9276 • 217-782-3397

JB Pritzker, Governor

James Jennings, Acting Director

217-524-3301

CERTIFIED MAIL

RETURN RECEIPT REQUESTED

MAR 03 2026

9589 0710 5270 2887 2258 32

Aaron Straus
Chem-Plate Industries LLC
1800 Touhy Ave
Elk Grove Village, IL 60007

Re: 0311835009 -- Cook County
Chem-Plate Industries LLC
ILD00665372
Log No C-658-M-12
RCRA Closure – 24B
Permit Closure Final Action

Dear Aaron Straus:

This letter is in response to the document dated December 29, 2025, which was received by Illinois EPA on January 5, 2026. It was submitted by Ramboll Americas Engineering Solutions Inc on behalf of Chem-Plate Industries Inc (Chem-Plate) in response to Illinois EPA's correspondence dated August 8, 2025, regarding the interim status closure of the hazardous waste container storage area (process code S01) at the Chem-Plate facility located at 30 North 8th Avenue in Maywood, Illinois.

The original closure plan for the hazardous waste storage area was approved on November 2, 1992 (Log No C-658), following an inspection by Illinois EPA which observed storage of tetrachloroethylene for greater than 90 days without a RCRA Permit. In 1993, soil investigations at the facility revealed that chlorinated solvent contamination had extended into the alley west of the Chem-Plate facility. Illinois EPA approved a Highway Authority Agreement with the Village of Maywood on March 9, 2011, for the alley and it approved an Environmental Land Use Control (ELUC) requiring engineered barriers over contaminated soil at the facility. The ELUC was recorded on December 9, 2005, with the Cook County Recorder of Deeds (Document No 0535603120). A separate ELUC for a contaminated neighboring property was recorded on January 20, 2004 (Document No 0402044036).

0311835009 -- Cook County

Log No C-658-M-12

Page 2

More recently, Illinois EPA issued a Non-Compliance Advisory (NCA) to Chem-Plate on June 27, 2022, when it was observed that the activities required by the approved closure plan were not yet completed. Chem-Plate submitted a closure plan modification in response to the NCA dated February 29, 2024, which was not approved by Illinois EPA.

Illinois EPA has reviewed the subject submittal as a modification to the approved closure plan and cannot approve it for the following reasons:

1. Illinois EPA reviewed data submitted under Log No C-658-M-5, dated July 25, 1997, which indicate that trichloroethylene (TCE) and tetrachloroethylene (PCE) were present at concentrations exceeding the soil saturation limit. In accordance with 35 IAC 742.305, no exposure route may be excluded from consideration while contaminant concentrations exceed the applicable soil saturation limit.
2. Some of the original contamination may have naturally degraded over time; however, the degradation of PCE and TCE can produce vinyl chloride, a daughter product that poses greater risk to human health and the environment than the parent compounds.
3. In 2013, the indoor inhalation exposure route was added to 35 IAC Part 742. The most recent soil investigation at this facility did not evaluate this pathway; therefore, Illinois EPA requires evaluation of the indoor inhalation exposure route prior to completion of RCRA closure. Although demolition of the existing structure would typically render this pathway incomplete, contaminant concentrations exceeding the soil saturation limit, and potentially the soil vapor saturation limit, prevent exclusion of this pathway.
4. Illinois EPA allowed for exclusion of the soil component of the groundwater ingestion exposure route during a Tier 3 evaluation which was approved on September 18, 1997. This pathway does not need to be assessed further.
5. Within 60 days of the date of this letter, submit a work plan addressing the concerns identified in Conditions 1-3. The work plan must include:
 - a. background information about the facility;
 - b. the goals and objectives of the sampling effort;
 - c. a description of the quality assurance/quality control procedures that will be utilized during sampling;
 - d. a description of the sampling procedures;
 - e. a description of how waste generated by sampling will be handled;

- f. the locations to be sampled, which must be approximately those locations indicated B-6, C-6, C-7, C-8, C-9, and C-10 on the map attached to this letter;
 - g. the list of analytes, which may be limited to PCE, TCE, cis and trans 1,2-dichloroethylene, and vinyl chloride; and
 - h. a plan for addressing the indoor inhalation exposure route at the affected off-site property located at 15 North 9th Avenue, Maywood, Illinois.
6. Chem-Plate does not have a current cost estimate and financial assurance for closure activities as required by 35 IAC 725.242–243. With the work plan described in Condition 5, submit a cost estimate for the activities required to complete RCRA closure. Chem-Plate must establish financial assurance for the estimated amount within 60 days of Illinois EPA's approval of the cost estimate in accordance with 35 IAC 725.243.

This letter will constitute Illinois EPA's final decision on the subject submittal. The owner or operator may appeal this final decision to the Illinois Pollution Control Board in accordance with 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 not to exceed 90 days by written notice from the applicant and 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 Illinois EPA as soon as possible.

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

Illinois Environmental Protection Agency
Division of Legal Counsel
2520 West Iles Avenue
Post Office Box 19276
Springfield, Illinois 62794-9276
217-782-5544

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

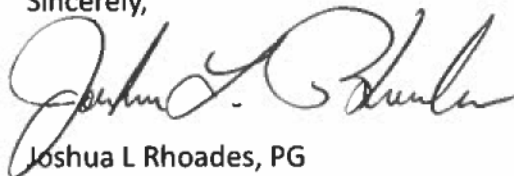
Illinois Pollution Control Board
60 East Van Buren Street, Suite 630
Chicago, Illinois 60605-1241
312-814-3620

Work required by this letter, submittal, or the regulations may also be subject to other laws governing professional services, such as the Illinois Professional Land Surveyor Act of 1989, the

Professional Engineering Practice Act of 1989, the Professional Geologist Licensing Act, and the Structural Engineering Licensing Act of 1989. This letter does not relieve anyone from compliance with these laws and the regulations adopted pursuant to these laws. All work that falls within the scope and definitions of these laws must be performed in compliance with them. Illinois EPA may refer any discovered violation of these laws to the appropriate regulating authority.

Questions regarding this letter should be sent to Behzad Feda by phone at 217-524-8980 or by email at behzad.feda@illinois.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Joshua L Rhoades".

Joshua L Rhoades, PG
Permit Section Manager
Bureau of Land

JLR:BF:0311835009-RCRA-C658M12-Denial.docx

BF TJH.

Attachment: 1997 Facility Map with Soil Data

cc: Angela DeDolph – Ramboll Americas Engineering Solutions Inc
Daniel Petersen – Ramboll Americas Engineering Solutions Inc

B-1



c-13

EXHIBIT C

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

CHEM-PLATE INDUSTRIES, LLC,	)	
Petitioners,	)	
	)	
v.	)	PCB 26-
	)	(RCRA – Ninety Day
ILLINOIS ENVIRONMENTAL PROTECTION	)	Extension)
AGENCY,	)	
Respondent.	)	

NOTICE

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

Chem-Plate Industries, LLC
c/o Phillip L. Comella, Partner
Taft Law
111 E. Wacker Drive, Suite 2600
Chicago, IL 60601-4208
PComella@taftlaw.com

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



Melanie A. Jarvis
Deputy Chief Counsel – Land Enforcement
P.O. Box 19276
Springfield, Illinois 62794-9276
217/782-5544
melanie.jarvis@illinois.gov
Dated: April 7, 2026

THIS FILING IS SUBMITTED ON RECYCLED PAPER

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

CHEM-PLATE INDUSTRIES, LLC,	)	
Petitioners,	)	
	)	
v.	)	PCB 26-
	)	(RCRA – Ninety Day
ILLINOIS ENVIRONMENTAL PROTECTION	)	Extension)
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, Melanie A. Jarvis, Assistant 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 July 13, 2026, 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 or about March 3, 2026, the Illinois EPA issued a final decision to the Petitioner.
2. On April 7, 2026, the Petitioner made a 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, Petitioner received the final decision on or about March 10, 2026.
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



Melanie A Jarvis
Deputy Chief Counsel – Land Enforcement
P.O. Box 19276
Springfield, Illinois 62794-9276
217/782-5544
866/273-5488 (TDD)
melanie.jarvis@illinois.gov
Dated: April 7, 2026

THIS FILING IS SUBMITTED ON RECYCLED PAPER

CERTIFICATE OF SERVICE

I, the undersigned attorney at law, hereby certify that on April 7, 2026, I served true and correct copies of a **REQUEST FOR NINETY DAY EXTENSION OF APPEAL PERIOD** 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

Chem-Plate Industries, LLC
c/o Phillip L. Comella, Partner
Taft Law
111 E. Wacker Drive, Suite 2600
Chicago, IL 60601-4208
PComella@taftlaw.com

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY



Melanie A. Jarvis
Deputy Chief Counsel – Land Enforcement
Division of Legal Counsel
P.O. Box 19276
Springfield, Illinois 62794-9276
217/782-5544
866/273-5488 (TDD)
melanie.jarvis@illinois.gov

From: [Comella, Philip L.](#)
To: [Jarvis, Melanie](#)
Subject: [External] Request for 90-day Extension to file Appeal
Date: Tuesday, April 7, 2026 10:56:03 AM
Attachments: [Scanned from a Xerox Multifunction Printer.pdf](#)
Importance: High

Melanie, as indicated, I just became more involved in this matter. On behalf of Chem-Plate Industries, I request a 90 day extension to file an appeal of this decision. Thank you for your help.

Phil



Philip L. Comella

Partner

PComella@taftlaw.com

Dir: 312.836.4112 | **Cell:** 630.853.5346

Tel: 312.527.4000 | **Fax:** 312.527.4011

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Chicago, Illinois 60601-4208

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Illinois Environmental Protection Agency

2520 West Iles Avenue • P.O. Box 19276 • Springfield, Illinois • 62794-9276 • 217-782-3397

JB Pritzker, Governor

James Jennings, Acting Director

217-524-3301

CERTIFIED MAIL

RETURN RECEIPT REQUESTED

MAR 03 2026

9589 0710 5270 2887 2258 32

Aaron Straus
Chem-Plate Industries LLC
1800 Touhy Ave
Elk Grove Village, IL 60007

Re: 0311835009 -- Cook County
Chem-Plate Industries LLC
ILD00665372
Log No C-658-M-12
RCRA Closure – 24B
Permit Closure Final Action

Dear Aaron Straus:

This letter is in response to the document dated December 29, 2025, which was received by Illinois EPA on January 5, 2026. It was submitted by Ramboll Americas Engineering Solutions Inc on behalf of Chem-Plate Industries Inc (Chem-Plate) in response to Illinois EPA's correspondence dated August 8, 2025, regarding the interim status closure of the hazardous waste container storage area (process code S01) at the Chem-Plate facility located at 30 North 8th Avenue in Maywood, Illinois.

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0311835009 -- Cook County

Log No C-658-M-12

Page 2

More recently, Illinois EPA issued a Non-Compliance Advisory (NCA) to Chem-Plate on June 27, 2022, when it was observed that the activities required by the approved closure plan were not yet completed. Chem-Plate submitted a closure plan modification in response to the NCA dated February 29, 2024, which was not approved by Illinois EPA.

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2. Some of the original contamination may have naturally degraded over time; however, the degradation of PCE and TCE can produce vinyl chloride, a daughter product that poses greater risk to human health and the environment than the parent compounds.
3. In 2013, the indoor inhalation exposure route was added to 35 IAC Part 742. The most recent soil investigation at this facility did not evaluate this pathway; therefore, Illinois EPA requires evaluation of the indoor inhalation exposure route prior to completion of RCRA closure. Although demolition of the existing structure would typically render this pathway incomplete, contaminant concentrations exceeding the soil saturation limit, and potentially the soil vapor saturation limit, prevent exclusion of this pathway.
4. Illinois EPA allowed for exclusion of the soil component of the groundwater ingestion exposure route during a Tier 3 evaluation which was approved on September 18, 1997. This pathway does not need to be assessed further.
5. Within 60 days of the date of this letter, submit a work plan addressing the concerns identified in Conditions 1-3. The work plan must include:
 - a. background information about the facility;
 - b. the goals and objectives of the sampling effort;
 - c. a description of the quality assurance/quality control procedures that will be utilized during sampling;
 - d. a description of the sampling procedures;
 - e. a description of how waste generated by sampling will be handled;

- f. the locations to be sampled, which must be approximately those locations indicated B-6, C-6, C-7, C-8, C-9, and C-10 on the map attached to this letter;
 - g. the list of analytes, which may be limited to PCE, TCE, cis and trans 1,2-dichloroethylene, and vinyl chloride; and
 - h. a plan for addressing the indoor inhalation exposure route at the affected off-site property located at 15 North 9th Avenue, Maywood, Illinois.
6. Chem-Plate does not have a current cost estimate and financial assurance for closure activities as required by 35 IAC 725.242–243. With the work plan described in Condition 5, submit a cost estimate for the activities required to complete RCRA closure. Chem-Plate must establish financial assurance for the estimated amount within 60 days of Illinois EPA's approval of the cost estimate in accordance with 35 IAC 725.243.

This letter will constitute Illinois EPA's final decision on the subject submittal. The owner or operator may appeal this final decision to the Illinois Pollution Control Board in accordance with 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 not to exceed 90 days by written notice from the applicant and 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 Illinois EPA as soon as possible.

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

Illinois Environmental Protection Agency
Division of Legal Counsel
2520 West Iles Avenue
Post Office Box 19276
Springfield, Illinois 62794-9276
217-782-5544

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

Illinois Pollution Control Board
60 East Van Buren Street, Suite 630
Chicago, Illinois 60605-1241
312-814-3620

Work required by this letter, submittal, or the regulations may also be subject to other laws governing professional services, such as the Illinois Professional Land Surveyor Act of 1989, the

Professional Engineering Practice Act of 1989, the Professional Geologist Licensing Act, and the Structural Engineering Licensing Act of 1989. This letter does not relieve anyone from compliance with these laws and the regulations adopted pursuant to these laws. All work that falls within the scope and definitions of these laws must be performed in compliance with them. Illinois EPA may refer any discovered violation of these laws to the appropriate regulating authority.

Questions regarding this letter should be sent to Behzad Feda by phone at 217-524-8980 or by email at behzad.feda@illinois.gov.

Sincerely,



Joshua L Rhoades, PG
Permit Section Manager
Bureau of Land

JLR:BF:0311835009-RCRA-C658M12-Denial.docx

BF TJH.

Attachment: 1997 Facility Map with Soil Data

cc: Angela DeDolph – Ramboll Americas Engineering Solutions Inc
Daniel Petersen – Ramboll Americas Engineering Solutions Inc



EXHIBIT D

Chem-Plate Industries, LLC
Maywood, Illinois
7/1/2026

Csat Calculations

Analyte	Solubility ¹ mg/kg	K _{oc} ¹ L/kg	f _{oc} ² g/g	K _d ³ cm ³ /g	θ _w ² L _{water} /L _{soil}	θ _a ² L _{air} /L _{soil}	H' ¹ unitless	ρ _b ² kg/L	Calculated Subsurface Soil Csat ⁶ mg/kg
Trichloroethene	1,500	100	0.0096	9.6E-01	0.30	0.13	4.10E-01	1.50	1,793
Tetrachloroethene	200	631	0.0096	6.1E+00	0.30	0.13	7.38E-01	1.50	1,264

Key:

f _{oc}	Organic carbon content of soil
H'	Henry's law constant
K _d	Soil-water partition coefficient
K _{oc}	Organic carbon partition coefficient
θ _a	Air-filled soil porosity
θ _w	Water-filled soil porosity
ρ _b	Dry soil bulk density

Notes:

- Default value from TACO or USEPA Regional Screening Levels
- Soil properties determined using default subsurface values from TACO and Foc from nearby site
- Calculated per TACO Appendix C, Table A, Equation S19 listed below for organic analytes

$$K_d = K_{oc} \cdot f_{oc}$$
- Default value from TACO Appendix C, Table B
- Values from Non-TACO Class I and Class II Groundwater Objectives.xls
- Calculated per TACO Appendix C, Table A, Equation S29 listed below

$$C_{sat} = \frac{S}{\rho_b} * [(K_d * \rho_b) + \theta_w + (H' * \theta_a)]$$
- Calculated per TACO Appendix C, Table A, Equations S17 and S18

EXHIBIT E

FILE COPY**Bureau of Land
Financial Record Review****General Information**

USEPA ID:	ILD000665372	Address:	30 N 8th Ave
BOL ID:	0311835009	City/State/Zip:	Maywood, IL 60153
Site Name:	Chem Plate Ind Inc	Phone:	847-640-1600
County:	Cook		

Owner

Chem Plate Ind Inc
30 N Eighth Ave
Maywood, IL 60153

Operator

Chem Plate Ind Inc
30 N Eighth Ave
Maywood, IL 60153

Facility Type**Facility Status****Reviewer(s)**

Reviewer	Date of Review	Phone
Robert Mathis	10/29/2020	217-785-7403

Description of Facility

Not Entered

Cost Estimate Details**Narrative**

Not Entered

Permit/Log Number	Date	Value	Basis
0	10/29/2020	\$0.00	Closure

Financial Mechanism Details**Narrative**

Not Entered

Mechanism Type	Institution	Mechanism ID	Value	Effective Date

Executive Summary

Pursuant to BOL Permit Letter Dated March 9, 2011 (Log No. C-658-M-10), the facility, in part, must complete a "Highway agreement between Chem-plate and and the Village of Maywood. The facility no longers manufacturers anything and the building is used for equipment storage only. The facility is not certified closed and the deed restriction has never been filed. See Christine Moritz's August 12, 2013 email for further info.

No action will be taken at this time in regards to Financial assurance.

IEPA-DIVISION OF RECORDS MANAGEMENT
RELEASABLE

DEC 01 2020
REVIEWER: SAB