

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

December 21, 2023

In re:)
)
)
UPS CACH Facility) (Provisional Variance - Land)
Petitioner.)
)

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

UPS CACH
Attn: Sadia Gulam
Corporate Environmental Manager
One UPS Way
Hodgkins, IL 60525

Dear Ms. Gulam:

The Illinois Environmental Protection Agency ("Illinois EPA") has reviewed your December 20, 2023 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:

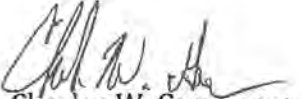
The UPS Chicago Area Consolidation Hub (CACH) closed on September 13, 2023 and has six drums of hazardous waste on site. Due to issues with the manufacturer's PHMSA EX approval letter, UPS CACH is unable to transport it offsite.

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,



Charles W. Gunnarson
Chief Legal Counsel
Illinois EPA



CACH
One UPS Way
Hodgkins, IL 60525

December 8, 2023

VIA EMAIL to Melanie.Jarvis@Illinois.gov

Illinois Environmental Protection Agency
Attn: Melanie Jarvis
1021 North Grand Avenue East
Springfield, Illinois 62794-9276

RE: UPS CACH Facility - Extension Request for Hazardous Waste Storage Time Limit

Dear Ms. Jarvis,

This letter is submitted to request an extension on the storage time limit for hazardous waste that has been on site at our United Parcel Service (UPS) Chicago Area Consolidation Hub (CACH) facility since it was generated and closed on September 13, 2023. The UPS CACH facility, EPA ID # ILD005231485, is a large quantity generator and has 90 days from that date to remove this hazardous waste from our site. This hazardous waste is currently on site in drums labeled with temporary ids 0913202346FW, 1109202356FW, 1109202357FW, 1116202374FW, 1116202375FW, and 1207202310FW. We are requesting an extension on the time limit for this hazardous waste to be on-site due to issues with the manufacture's PHMSA EX approval letter that allows for legal transportation of this hazardous waste to the Treatment, Storage, and Disposal facility.

During classification and preparation of this waste for off-site disposal, our hazardous waste vendor determined that the manufacture's PHMSA EX2004010112 letter was not valid for this hazardous waste at our facility due to the specific part number P75AC-PG-WT not being listed. Our hazardous waste vendor reached out to the manufacture and the manufacture has submitted the documentation to PHMSA to update the EX2004010112 letter. However, at this time, the manufacture has no correspondence from PHMSA for approval nor a timeline from PHMSA for when the letter will be updated. Due to these circumstances, UPS is requesting a 60 – 90 day extension, for this hazardous waste to remain on site.

Thank you for your assistance in this request. If you have any questions or need more information, please contact Maria Cowan, at (708) 670-5087.

Sincerely,
Sadia Gulam
Sadia Gulam
Corporate Environmental Manager

cc: Maria Cowan, UPS