

**BEFORE THE ILLINOIS POLLUTION CONTROL BOARD**

SOUTHWIND RAS I LLC,	)	
	)	
	)	
Petitioner,	)	PCB No. 2026-014
	)	
v.	)	(Permit Appeal - Land)
	)	
ILLINOIS ENVIRONMENTAL PROTECTION	)	
AGENCY,	)	
	)	
Respondent.	)	

**NOTICE OF FILING**

**TO: Attached Service List Via Email**

PLEASE TAKE NOTICE THAT today I caused to be electronically filed with the Clerk of the Illinois Pollution Control Board, via the "COOL" System, the Respondent, Illinois Environmental Protection Agency's Certification of the Record on Appeal and Record on Appeal (R000001-000222), true and correct copies of which are attached hereto and hereby served upon you.

ILLINOIS ENVIRONMENTAL PROTECTION  
AGENCY,

By: /s/ Elizabeth Dubats  
Elizabeth Dubats  
Assistant Attorney General  
Environmental Bureau  
Illinois Attorney General's Office  
69 W. Washington St., 18th Floor  
Chicago, Illinois 60602  
(773) 590-6794  
[Elizabeth.Dubats@ilag.gov](mailto:Elizabeth.Dubats@ilag.gov)

Dated: November 12, 2025

**SERVICE LIST**

Alec Messina  
Melissa S. Brown  
Michael P. Murphy  
HEPLERBROOM, LLC  
4340 Acer Grove Drive  
Springfield, Illinois 62711  
Alec.Messina@heplerbroom.com  
Melissa.Brown@heplerbroom.com  
Michael.Murphy@heplerbroom.com

Brad Halloran  
Hearing Officer  
Illinois Pollution Control Board  
60 E. Van Buren, Suite 630  
Chicago, Illinois 60605  
[Brad.Halloran@Illinois.Gov](mailto:Brad.Halloran@Illinois.Gov)

**CERTIFICATE OF SERVICE**

I, Elizabeth Dubats, an Assistant Attorney General, caused to be served on this 12th day of November, 2025, a true and correct copies of the Notice of Filing and Respondent, Illinois Environmental Protection Agency's Certification and Index of the Record on Appeal via electronic mail with return receipt and Record on Appeal (R000001-000222) served by file transfer link, upon the persons listed on the Service List.

/s/ Elizabeth Dubats

Elizabeth Dubats

Assistant Attorney General

Environmental Bureau

Illinois Attorney General's Office

69 W. Washington St., 18th Floor

Chicago, Illinois 60602

(773) 590-6794

[Elizabeth.Dubats@ilag.gov](mailto:Elizabeth.Dubats@ilag.gov)

**BEFORE THE ILLINOIS POLLUTION CONTROL BOARD**

SOUTHWIND RAS I LLC,

**Petitioner,**

v.


ILLINOIS ENVIRONMENTAL PROTECTION  
AGENCY,

Respondent.

PCB No. 2026-014

(Permit Appeal - Land)

**CERTIFICATION OF ADMINISTRATIVE RECORD FOR POLLUTION CONTROL**  
**BOARD REVIEW**

I, Michael Anderson, , hereby certify that I am an Illinois Environmental Protection Agency, Bureau of Land/Permit Section employee having custody of the Bureau of Land's permit records. The documents provided labeled "Administrative Record for Log No. BUD25-004 for Judicial Review" are formatted as portable document format (PDF) computer files, bates stamped and arranged as follows:

## ADMINISTRATIVE RECORD

## I. Permit File

1. Letter from Joshua Rhoades (IEPA, BOL) to Southwind RAS I LLC, dated July 9, 2025, denying March 21, 2025, request for Beneficial Use Determination Permit to blend recycled asphalt shingles with reclaimed asphalt pavement to produce eco-mix aggregate for road construction and rural pavement construction dust control (R000001-000002)
2. Beneficial Use Determination Tracking Sheet Log No. BUD25-004, Denial of Southwind RAS I LLC request to use recycled asphalt shingles printed on July 9, 2025 (R 000003)
3. Email chain between Melanie Jarvis and Richard Kim, June 23, 2025, responding to request for legal advice re Southwind RAS I LLC request for Beneficial Use Determination Permit. Email communications among Illinois EPA Department of Legal Counsel personnel requesting and/or providing legal advice redacted for Attorney client privilege. Communications containing attorney work product redacted. (R 000004-000005)



4. Email chain between Richard Kim and John Roop and copying Michael Anderson responding to request for legal advice concerning Southwind RAS I LLC request for Beneficial Use Determination Permit. Email communications to and from Illinois EPA Department of Legal Counsel and Illinois EPA personnel requesting and/or providing legal advice redacted for Attorney client privilege. Communications containing attorney work product redacted. (R 000006-000009)
5. Beneficial Use Determination Tracking Sheet Log No. BUD25-004, Received request from Southwind RAS I LLC to use recycled asphalt shingles on March 21, 2025, printed on March 24, 2025 (R 000010)
6. Michael Anderson Review Notes of Southwind RAS I LLC Beneficial Use Determination Request to blend recycled asphalt shingles with crushed aggregate for cost effective dust control and patching maintenance. Notes conveying requests and answers to requests for legal advice to between Illinois EPA Bureau of Land Permit Section and Illinois EPA Department of Legal Counsel Attorneys containing attorney client privileged information redacted. (R 000011-000013)
7. Checklist BUD25-004, Southwind RAS I LLC Beneficial Use Determination Application. (R 000014-000015)
8. Letter: Josh Quinn (Southwind RAS I LLC) to T. Hubbard (IEPA-BOL) March 20, 2025, attached to Southwind RAS I LLC Beneficial Use Determination Application for blended asphalt shingles with reclaimed pavement. (R 000016-000068)
9. Letter: Josh Quinn (Southwind RAS I LLC) to M. Anderson (IEPA) March 31, 2025, re: Additional Information for Southwind RAS I LLC Beneficial Use Determination Permit Application, Certification and Shingles Training Program. (R 000069-000087)
10. Letter: Josh Quinn (Southwind RAS I LLC) to M. Anderson (IEPA) April 8, 2025, attached to Revised Executed 39(i) Application to include Slade O'Keefe (R 000088-000092)
11. Southwind RAS I LLC Purchase Order Construction Aggregate Blend to Reliable Asphalt dated June 10, 2025. (R 000093-000096)

II. Correspondence

1. Email Michael Anderson to Mara McGinnis, Brad Frost, Chris Pressnall, A. Herr, Luis Lopez, Paulina Lopez-Santos (IEPA), dated March 27, 2025, re Status Change of Southwind RAS I LLC application from review to complete. (R 000097)
2. Email chain between Michael Anderson, Linda Marr, Jason Selling March 26-April 9, 2025, Comments on Southwind RAS I LLC BUD Application. (R 000098-000099)
3. Email chain between Michael Anderson, Linda Marr and Derek Rompot (IEPA) April 29, 2025, Attached to Coordinated Review of Permit Application Southwind RAS I LLC Beneficial Use Determination March 26, 2025 (R 000100-0000102)
4. Email chain between Michael Anderson (IEPA) and Josh Quinn, (Southwind RAS I LLC) dated March 26-June 30, 2025, re Southwind RAS I LLC Beneficial Use Determination Application. (R 000103-000106)

III. Inspection Reports and Violation Notice

1. January 26, 2023, Inspection Report of Southwind RAS I LLC. (R 000107-000114)
2. Violation Notice L-2023-00094, issued to Southwind RAS I LLC sent on April 11, 2023. (R 000115-0000182)
3. September 25, 2023, Inspection Report Southwind RAS I LLC. (R 000183-000196)
4. Southwind RAS I LLC, December 19, 2024, Southwind RAS I LLC response to Notice to Pursue Legal Action. (R 000197-000222)

**VERIFICATION BY CERTIFICATION**

Under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in the foregoing affidavit are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that he verily believes the same to be true.

BY:   
Michael Anderson

DATE: 11/10/25



# ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

R 000001

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

JUL 09 2025

9589 0710 5270 0389 7156 15

Owner/Operator

Southwind RAS I, LLC

Attn: M. Slade O'Keefe

2250 Southwind Blvd

Bartlett, IL 60103-1304

Site Location

5 South Material Road

Romeoville, IL 60446

Re: 1970905199 -- Will County  
Romeoville RAS Recycle Center  
Log No. BUD25-004  
Permit Denials – 03B

IEPA - Division of Records Management  
Releasable

AUG 04 2025

Reviewer: SAB

Dear M. Slade O'Keefe:

The Illinois Environmental Protection Agency (Illinois EPA) has reviewed the request for a Beneficial Use Determination (BUD) dated March 20, 2025, and received by the Illinois EPA on March 21, 2025, to blend recycled asphalt shingles (RAS) with reclaimed asphalt pavement (RAP) or other crushed coarse aggregate on currently unpaved rural roadways for the purpose of dust control and road stabilization, both on public and private projects. This request is disapproved. In accordance with Section 22.54(b) of the Illinois Environmental Protection Act (415 ILCS 5/), the Illinois EPA must provide reasons for the disapproval. The following reason is given:

On April 11, 2023, the following alleged violations were observed at Romeoville RAS Recycle Center:

1. An Illinois EPA inspector observed open dumping at the subject property, which violates Illinois law. See 415 ILCS 5/21(a).
2. An Illinois EPA inspector observed evidence of asbestos exposure assessments not being done during grinding operations at the subject property, which violates Illinois law and the Permit. See 415 ILCS 5/21(d)(1); 415 ILCS 5/22.54(d); Permit Condition 11; and Permit Condition 21.
3. The subject property was not testing samples using National Institute of Standards and Technology (NIST) accredited lab, which violates Illinois law and the permit. See 415 ILCS 5/21(d)(1); Permit Condition 17; and Permit Condition 20.
4. An Illinois EPA inspector observed inconsistent records with discrepancies in the quantities of materials at the subject property, which violates Illinois law and the Permit. See 415 ILCS 5/21(d)(1); Permit Condition 10; Permit Condition 15; and Permit Condition 17; and Permit Condition 18.

2125 S. First Street, Champaign, IL 61820 (217) 278-5800  
115 S. LaSalle Street, Suite 2203, Chicago, IL 60603  
1101 Eastport Plaza Dr., Suite 100, Collinsville, IL 62234 (618) 346-5120  
9511 Harrison Street, Des Plaines, IL 60016 (847) 294-4000

595 S. State Street, Elgin, IL 60123 (847) 608-3131  
2309 W. Main Street, Suite 116, Marion, IL 62959 (618) 993-7200  
412 SW Washington Street, Suite D, Peoria, IL 61602 (309) 671-3022  
4302 N. Main Street, Rockford, IL 61103 (815) 987-7760

Page 2

5. The subject property did not have all required records available for inspection, which violates Illinois law and the Permit. See 415 ILCS 5/21(d)(1); Permit Condition 10; and Permit Condition 17.

Due to the ongoing litigation of alleged violation of Illinois law and non-compliance with multiple Permit Conditions, the Illinois EPA is unable to approve the proposed Beneficial Use Determination request at this time. Upon resolving violation notices L-2023-00093 and L-2023-00094, the applicant may resubmit the application for consideration.

The applicant may appeal this final decision to the Illinois Pollution Control Board pursuant to 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 of time not to exceed 90 days by written notice from the applicant and the 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 the Illinois EPA as soon as possible.

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

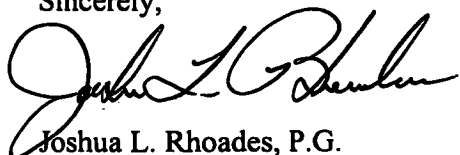
Illinois Environmental Protection Agency  
Division of Legal Counsel  
2520 West Iles Avenue  
P.O. Box 19276  
Springfield, IL 62794-9276  
217/782-5544

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

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


Any questions about this letter should be directed to Michael Anderson of my staff by phone at 217/524-8440 or by email at Michael.A.Anderson@illinois.gov.

Sincerely,



Joshua L. Rhoades, P.G.  
Permit Section Manager  
Bureau of Land

JLR:JJR:MAA: 1970905199-BUD-BUD25004-Denial.docx

cc:  Gregory W. Wilcox P.E., Winston Engineering  
Dave Hartke, Will County

# Beneficial Use Determination Tracking Sheet

Printed: Wednesday, July 9, 2025

Log #: **BUD25-004**

Final Action: **Denied**

Action Date: **7/9/2025**

Expiration Date:

Receive Date: **3/21/2025**

Unit: **DAU**

Reviewer: **MAA**

GW Reviewer:

Notify DLC:

Applicant Company Name: **Southwind RAS, LLC**

Contact:

Address: **2250 Southwind Blvd**

City: **Bartlett**

State: **IL** Zip: **60103**

BUD Use: **Wed 10 11 2017 Test**

Material Used: **Asphalt shingles**

Long Description:

Gen Site Number: **1970905199**

Gen City: **Romeoville**

Gen County: **Will**

User Site Number: **0894125010**

User City: **Bartlett**

User County: **Kane**

Comments: Reclaimed asphalt shingles, blended with reclaimed asphalt pavement or other crushed coarse aggregate, is a cost effective way to improve dust control, surface stabilization, patching maintenance, and private aggregate pavement projects. Additional Info dated 04/08/25; rec'd 04/09/25

**From:** [Kim, Richard](#)  
**To:** [Dubats, Elizabeth](#)  
**Cc:** [Sawyer, Cara](#)  
**Subject:** [EXTERNAL] FW: Southwind RAS  
**Date:** Wednesday, August 27, 2025 12:54:46 PM

---

Email with Melanie.

---

**From:** Kim, Richard  
**Sent:** Monday, June 23, 2025 9:03 AM  
**To:** Jarvis, Melanie <[Melanie.Jarvis@Illinois.gov](mailto:Melanie.Jarvis@Illinois.gov)>  
**Subject:** RE: Southwind RAS

Thanks

---

**From:** Jarvis, Melanie <[Melanie.Jarvis@Illinois.gov](mailto:Melanie.Jarvis@Illinois.gov)>  
**Sent:** Monday, June 23, 2025 9:02 AM  
**To:** Kim, Richard <[Richard.Kim@Illinois.gov](mailto:Richard.Kim@Illinois.gov)>  
**Subject:** RE: Southwind RAS

[REDACTED]

---

**From:** Kim, Richard <[Richard.Kim@Illinois.gov](mailto:Richard.Kim@Illinois.gov)>  
**Sent:** Monday, June 23, 2025 8:54 AM  
**To:** Jarvis, Melanie <[Melanie.Jarvis@Illinois.gov](mailto:Melanie.Jarvis@Illinois.gov)>  
**Subject:** Southwind RAS

[REDACTED]

[REDACTED]

[REDACTED]

Michael Anderson  
Bureau of Land - Permit Section  
Disposal Alternatives Unit  
217/524-8440

Rich Kim  
Assistant Counsel – Land Enforcement

Illinois Environmental Protection Agency  
2520 West Iles Avenue  
P.O. Box 19276  
Springfield, Illinois 62794-9276  
Office: 217-782-9822 Fax: 217-782-9807  
[Richard.Kim@Illinois.gov](mailto:Richard.Kim@Illinois.gov)  
Work Hours: 7:00-3:30  
In Office: Tuesday – Thursday  
Remote: Monday and Friday

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**From:** [Kim, Richard](#)  
**To:** [Dubats, Elizabeth](#)  
**Cc:** [Sawyer, Cara](#)  
**Subject:** [EXTERNAL] FW: Southwind RAS (BOL 1970905199)  
**Date:** Wednesday, August 27, 2025 12:52:58 PM

---

[REDACTED]

---

**From:** Roop, John J. <John.Roop@Illinois.gov>  
**Sent:** Wednesday, July 30, 2025 8:32 AM  
**To:** Kim, Richard <Richard.Kim@Illinois.gov>  
**Cc:** Rhoades, Joshua <Joshua.Rhoades@Illinois.gov>  
**Subject:** RE: Southwind RAS (BOL 1970905199)

Good Morning, Rich,

[REDACTED]

John Roop

---

**From:** Kim, Richard <[Richard.Kim@Illinois.gov](mailto:Richard.Kim@Illinois.gov)>  
**Sent:** Wednesday, July 30, 2025 7:56 AM  
**To:** Roop, John J. <[John.Roop@Illinois.gov](mailto:John.Roop@Illinois.gov)>; Rhoades, Joshua <[Joshua.Rhoades@Illinois.gov](mailto:Joshua.Rhoades@Illinois.gov)>  
**Subject:** RE: Southwind RAS (BOL 1970905199)

[REDACTED]

[REDACTED]

---

**From:** Roop, John J. <[John.Roop@Illinois.gov](mailto:John.Roop@Illinois.gov)>  
**Sent:** Thursday, July 3, 2025 1:44 PM  
**To:** Kim, Richard <[Richard.Kim@Illinois.gov](mailto:Richard.Kim@Illinois.gov)>  
**Subject:** RE: Southwind RAS (BOL 1970905199)

Thank you, Rich. Have a Happy 4<sup>th</sup> of July!

John

---

**From:** Kim, Richard <[Richard.Kim@Illinois.gov](mailto:Richard.Kim@Illinois.gov)>  
**Sent:** Thursday, July 3, 2025 1:39 PM  
**To:** Roop, John J. <[John.Roop@Illinois.gov](mailto:John.Roop@Illinois.gov)>  
**Subject:** RE: Southwind RAS (BOL 1970905199)

[REDACTED]

[REDACTED]



**From:** Roop, John J. <[John.Roop@Illinois.gov](mailto:John.Roop@Illinois.gov)>  
**Sent:** Thursday, July 3, 2025 1:33 PM  
**To:** Kim, Richard <[Richard.Kim@Illinois.gov](mailto:Richard.Kim@Illinois.gov)>  
**Cc:** Anderson, Michael <[Michael.A.Anderson@Illinois.gov](mailto:Michael.A.Anderson@Illinois.gov)>  
**Subject:** RE: Southwind RAS (BOL 1970905199)

Hi Rich,

[REDACTED]

Thank You,

John Roop

---

**From:** Kim, Richard <[Richard.Kim@Illinois.gov](mailto:Richard.Kim@Illinois.gov)>  
**Sent:** Monday, June 23, 2025 11:03 AM  
**To:** Roop, John J. <[John.Roop@Illinois.gov](mailto:John.Roop@Illinois.gov)>  
**Cc:** Anderson, Michael <[Michael.A.Anderson@Illinois.gov](mailto:Michael.A.Anderson@Illinois.gov)>  
**Subject:** RE: Southwind RAS (BOL 1970905199)

[REDACTED]

---

**From:** Roop, John J. <[John.Roop@Illinois.gov](mailto:John.Roop@Illinois.gov)>  
**Sent:** Monday, June 23, 2025 10:59 AM  
**To:** Kim, Richard <[Richard.Kim@Illinois.gov](mailto:Richard.Kim@Illinois.gov)>  
**Cc:** Anderson, Michael <[Michael.A.Anderson@Illinois.gov](mailto:Michael.A.Anderson@Illinois.gov)>  
**Subject:** FW: Southwind RAS (BOL 1970905199)

Hi Rich,

[REDACTED]

[REDACTED]

Thank You,

John Roop

---

**From:** Anderson, Michael <[Michael.A.Anderson@Illinois.gov](mailto:Michael.A.Anderson@Illinois.gov)>  
**Sent:** Monday, June 23, 2025 9:09 AM  
**To:** Roop, John J. <[John.Roop@Illinois.gov](mailto:John.Roop@Illinois.gov)>  
**Cc:** Hubbard, Thomas <[Thomas.Hubbard@Illinois.gov](mailto:Thomas.Hubbard@Illinois.gov)>

**Subject:** FW: Southwind RAS (BOL 1970905199)

John,

When you have some time to talk, I'm going to need your input on this.

Michael A.

---

**From:** Kim, Richard <[Richard.Kim@Illinois.gov](mailto:Richard.Kim@Illinois.gov)>  
**Sent:** Monday, June 23, 2025 9:03 AM  
**To:** Anderson, Michael <[Michael.A.Anderson@Illinois.gov](mailto:Michael.A.Anderson@Illinois.gov)>  
**Subject:** RE: Southwind RAS (BOL 1970905199)

[REDACTED]

---

**From:** Anderson, Michael <[Michael.A.Anderson@Illinois.gov](mailto:Michael.A.Anderson@Illinois.gov)>  
**Sent:** Monday, June 23, 2025 8:50 AM  
**To:** Kim, Richard <[Richard.Kim@Illinois.gov](mailto:Richard.Kim@Illinois.gov)>  
**Subject:** RE: Southwind RAS (BOL 1970905199)

Richard,

Any progress on this request?

Michael A.

---

**From:** Anderson, Michael  
**Sent:** Tuesday, June 17, 2025 12:35 PM  
**To:** Kim, Richard <[Richard.Kim@Illinois.GOV](mailto:Richard.Kim@Illinois.GOV)>  
**Subject:** RE: Southwind RAS (BOL 1970905199)

Richard,

[REDACTED]

[REDACTED]

Michael Anderson  
Bureau of Land - Permit Section  
Disposal Alternatives Unit  
217/524-8440

---

**From:** Kim, Richard <[Richard.Kim@Illinois.gov](mailto:Richard.Kim@Illinois.gov)>  
**Sent:** Tuesday, June 17, 2025 9:58 AM  
**To:** Anderson, Michael <[Michael.A.Anderson@Illinois.gov](mailto:Michael.A.Anderson@Illinois.gov)>  
**Subject:** Southwind RAS (BOL 1970905199)

[REDACTED]

Rich Kim  
Assistant Counsel – Land Enforcement  
Illinois Environmental Protection Agency  
2520 West Iles Avenue  
P.O. Box 19276  
Springfield, Illinois 62794-9276  
Office: 217-782-9822 Fax: 217-782-9807  
[Richard.Kim@Illinois.gov](mailto:Richard.Kim@Illinois.gov)  
Work Hours: 7:00-3:30  
In Office: Tuesday – Thursday  
Remote: Monday and Friday

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# Beneficial Use Determination Tracking Sheet

Printed: Monday, March 24, 2025

Log #: **BUD25-004**

Final Action:

Action Date:

Expiration Date:

Receive Date: **3/21/2025**

Unit: **DAU**

Reviewer:

GW Reviewer:

Notify DLC:

Applicant Company Name: **Southwind RAS, LLC**

Contact:

Address: **2250 Southwind Blvd**

City: **Bartlett**

State: **IL** Zip: **60103**

BUD Use: **Wed 10 11 2017 Test**

Material Used: **Asphalt shingles**

Long Description:

Gen Site Number: **1970905199**

Gen City: **Romeoville**

Gen County: **Will**

User Site Number: **0894125010**

User City: **Bartlett**

User County: **Kane**

Comments: Reclaimed asphalt shingles, blended with reclaimed asphalt pavement or other crushed coarse aggregate, is a cost effective way to improve dust control, surface stabilization, patching maintenance, and private aggregate pavement projects.

- FYI 2254 cert. is the 39(i) form, but this is a 2013 version, so they need to provide a current 39(i) form

**REVIEW NOTES****Reviewed By:** Michael A. Anderson (a.k.a. MAA)

	<u>User</u>	<u>Generator</u>
Site Number:	0894125010	1970905199
Site County:	Kane	Will*
Site Name:	Bluff City Construction, LLC	Romeoville RAS Recycle Center
Site Address	2250 Southwind Blvd	5 S. Material Road
Log No:	BUD25-004	

Application Received: 3/21/2025

Marked Complete: 4/3/2025

Due Date: N/A

**Application Description:** Reclaimed asphalt shingles, blended with reclaimed asphalt pavement or other crushed coarse aggregate, is a cost-effective way to improve dust control, surface stabilization, patching maintenance, and private aggregate pavement projects.

**Regulation Description:** Beneficial Use Determination Section 22.54 of the Act

**Material Generator Owner/Operator**

Company Name: Southwind RAS I, LLC – Romeoville RAS Recycle Center

Contact: M. Slade O’Keefe

Address: 2250 Southwind Blvd

City, State Zip: Bartlett, IL 60103-1304

Phone #: 630/233-5700

E-mail:

**Material User Owner/Operator**

Company Name: Bluff City Construction, LLC

Contact: Matthew P. Vondra

Address: 2250 Southwind Blvd

County: Kane

City, State Zip: Bartlett, IL 60103-1304

Phone #: 630/497-8700

E-mail:

**Engineer**

Company Name: Winston Engineering

Contact: Gregory W. Wilcox

Address: 2250 Southwind Blvd.

City, State Zip: Bartlett, IL 60103-1304

Phone #: 630/917-1158

E-mail:

Signature Date: March 18, 2025

**Other Contact:**

Josh Quinn  
joshq@grp7.com  
630/497-8700

**Environmental Justice:** Generator: 0 – Not an EJ area; User: Swap Tool 1 – EJ Minority Pop.  
EJ sent out on March 27, 2025. (note: make sure to not write too much in the boxes as it will cause an error)  
Marked Complete – No Outreach (March 27, 2025)

**FACES:** Generator: 3 resolved violations. No enforcement history  
User: None

**CROPA:** sent on 3/26/2025

BOA Comments:

WPC Comments:

PWS Comments:

**User Delegated County:** ☐ Yes ☒ No

**Generator Delegated County:** ☒ Yes ☐ No

Contact's Name: Dave Hartke (Will)

Contact's Email: dhartke@willcountygreen.com

Contact's Comments:

**Field Operation Section:** Des Plaines

Manager's Name: Michael McGee

Contact's Phone #: (847) 294-4067

Contact's Email: michael.mcgee2@illinois.gov

Contact's Comments:

**Local Siting:** ☐ Applicable ☒ Not Applicable

Explanation: the application is not an expansion or new location

**Discussion:**

While the BUD is written as a modification there is a chance that there isn't a previous existing BUD. To clear this up I was told to reach out to their contact. I tried calling but did not reach them so I got Josh Quinn's email and sent the following message:

*Good afternoon Josh Quinn,*

*I have some questions pertaining to the Beneficial Use Determination registration that was submitted to the Illinois Environmental Protection Agency on March 20, 2025, and received on March 21, 2025. I tried calling but couldn't get ahold of you and the line wouldn't let me leave a message. When you have the time could you call me at 217/524-8440.*

*Thank you,*

*Michael Anderson  
Bureau of Land - Permit Section  
Disposal Alternatives Unit  
217/524-8440*

After talking to Josh on the phone the following has been clarified:

1. The user site number is 0894125010 and the county is Kane
2. The BUD is to be treated as its own registration
3. A 39(i) and training certificate will be sent to Illinois EPA as a hard copy.
4. The training should mention 4 apartment cutoffs for accepted shingles

Received additional information on April 1, 2025, that addressed all the missing information and forms. Upon further reviewal I noticed that the owner/operator of the LPC-PA27 is registered under M. Slade, while the 39(i) was only listed Josh Quinn as the owner and operator. I will call to check if Josh is the only one with personal involvement with the Romeoville site location.

Received additional information on April 9, 2025, that addresses the missing 39(i) for M. Slade allowing me to submit the registration for approval.

Called Melanie Jarvis to check if there was an enforcement action that would inhibit Southwind RAS I from receiving a BUD. I was transferred to the Richard Kim. He stated he will investigate the enforcement actions and report back with an answer. June 17, 2025.

Called Josh Quinn to verify that RAS is in demand and that the location is not too close to their other location in Lorang that was approved. He stated a response email would address the request for more information. An email was received on June 17, 2025, and will be attached to the permit package. A summary of the information is that the Romeoville location would open their services to local customers and projects, reduce the overall tonnage at the site, and demand has been demonstrated by several purchase order forms that were attached to the email. June 17, 2025.

Richard Kim sent an email back on June 23, 2025, [REDACTED]

[REDACTED] I will pass this information along to John for advice on how to proceed. June 23, 2025.

### **Recommendations:**

~~I recommend an approval of the BUD registration. All required information was submitted and adheres to the regulations.~~

Due to outstanding legal actions against the Romeoville site through the violation notices L-2023-00093 and L-2023-00094, I recommend a denial of the BUD registration. July 3, 2025.

**Checklist for BUD Applications**

Site Number: 197090529

Log No. BUD 25-004

Project Name: Southwind Rep RAS, LLC

Received Date: 3/21/25

Reviewer: MAA

**LEGEND**

PR: Provided

AD: Adequate

NA: Not Applicable

EX: Explanations and notes

**LPC-PA27 Form**

PR AD NA EX

**I. GENERAL INFORMATION**☒ — — — A. Type of Beneficial Use☒ — — — B. Time specified☒ — — — C. Description of Beneficial Use**II. SITE IDENTIFICATION**☒ — — — A. Material Generator Information☒ — — — B. Material User Information**III. AFFIDAVITS**☒ — — — A. Generator's Signature for characterization of material☒ — — — B. End User's Signature for storage and use of material

— — — C. Intermediate User's Signature (if applicable)

☒ — — — **IV. DESCRIPTION OF MATERIAL GENERATION**



PR AD NA EX

~~✓~~ — X X V. DESCRIPTION OF INTERMEDIATE STORAGEX — — — VI. JUSTIFICATION FOR BENEFICIAL USE~~✓~~ — X X VII. HUMAN/ENVIRONMENT HEALTH DISCUSSIONX — — — VIII. CHEMICAL/PHYSICAL ANALYSIS— — X X IX. SITE GEOLOGY/GW - IF LAND APPLIEDX — — — X. VOLUME AND STORAGE TIMESX — — — XI. OTHER INFORMATION AS NECESSARY

## XII. SIGNATURES (ORIGINAL IN INK REQ.)

X — — — A. ApplicantX — — — B. Engineer signature and seal

## XIII. FOR ASPHALT SHINGLE BUDs

X — — ~~✓~~ A. 22.54 Affidavit or 39(i) form [required by 22.54(j) of the Act]X — — — B. Procedure for identifying and rejecting asbestos containing shinglesX — — — C. Narrative that the facility will only accept shingles from residences or bldgs. With 4 or less apartments.

## NOTES:

IX and VII applicant stated this section is N/A and provided a blank

XIII. A need to get 39(i) form I was told  
the 22.54 Affidavit is outdated.



## Southwind RAS I, LLC

---

March 20, 2025

Mr. Thomas Hubbard, P.E.  
Manager, Disposal Alternatives Unit  
Bureau of Land  
Illinois Environmental Protection Agency  
1021 North Grand Avenue East  
Springfield, IL 62794-9276

Re: Southwind RAS I, LLC – Romeoville, Will County, Romeoville, IL  
Beneficial Use Determination (BUD) Application

**RECEIVED**

MAR 21 2025

IEPA-BOL  
PERMIT SECTION

Dear Mr. Hubbard:

Southwind RAS I, LLC (Southwind) respectfully submits the enclosed Beneficial Use Determination (BUD) application for the above referenced site, located at the Southwind RAS I, LLC – Romeoville facility (5 S. Material Road, Romeoville, IL 60446).

The purpose of this BUD would be a continuation of previously approved applications for the use of a blend of recycled asphalt shingles (RAS) and reclaimed asphalt pavement (RAP) or other crushed coarse aggregate on currently unpaved rural roadways (i.e. township / county highways) for the purposes of dust control and road stabilization, with a slight modification. In addition to the aforementioned uses, Southwind is petitioning to allow for an additional end use of RAS/crushed coarse aggregate blend in applications where the mixture is used as part of private pavement or structure developments in accordance with designs and specifications approved by an Illinois Licensed Professional Engineer. This process, which includes the same materials used in typical asphalt production, would reduce construction costs of private aggregate pavement and structural developments by using recycled materials versus virgin materials. Additional benefits may include greater permeability of pavement, if needed.

Please note that this application mimics the submittal used to obtain the Beneficial Use Determination (BUD) (BUD20-003-M1) recently issued for Southwind RAS I, LLC – Lorang Road in Elburn, IL. This application seeks to use the same materials outlined in that facility's application.

A specification designed by a professional engineer (P.E.) with experience in municipal transportation and roadways and private aggregate pavement developments is also included in this application.



## **Southwind RAS I, LLC**

---

Upon review and approval by the Illinois Environmental Protection Agency (IEPA), Southwind RAS desires to utilize this BUD process and ship outbound RAS for use in accordance with the specification outlined in this application across multiple locations as public and private opportunities become available.

Approval by the IEPA will increase the demand for RAS thus reducing inbound stockpiles of shingles and fulfilling the goal of providing an environmentally viable alternative to diverting shingles to the landfill.

To complete the permit application, the following forms are also enclosed: 1) completed LPC-PA-27 application; 2) 22.54 certification forms; 3) generator and end-user affidavits; 4) Best Management Practices (BMPs); 5) application narrative; 6) RAP or Other Crushed Coarse Aggregate/RAS specification; 7) list of facilities owned and operated by Southwind RAS I; and 8) a facility drawing.

Thank you in advance for your assistance with this application submittal. Given the timing and nature of seasonal temperatures and potential effects on the effectiveness of this construction process, an expedited review of this application would be appreciated. Should you have any questions or require any additional information, please contact me at (630) 497-8700.

Sincerely,

**SOUTHWIND RAS I, LLC**

A handwritten signature in black ink, appearing to read "Josh Quinn".

Josh Quinn

Vice President – Safety, Environmental Services and Compliance

Enclosures

**APPLICATION TO REQUEST A BENEFICIAL USE DETERMINATION  
FOR THE  
SOUTHWIND RAS I, LLC – ROMEOVILLE RECYCLING CENTER  
Romeoville, IL**



**SUBMITTED TO:**



**Illinois  
Environmental  
Protection Agency**

**SUBMITTED BY:**



**Southwind RAS I,  
LLC**

March 2025

APPLICATION TO REQUEST A BENEFICIAL USE DETERMINATION  
FOR THE  
SOUTHWIND RAS I, LLC – ROMEOVILLE RECYCLING CENTER  
Romeoville, Illinois

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# Southwind RAS I, LLC

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Certificate of Authenticity

## SECTION 1:

### General Information/Site Identification

- IEPA Form LPC-PA-27  
Application form





# Illinois Environmental Protection Agency

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

R 000022

OFFICIAL USE ONLY

M. Slade O'Keefe

LPC-PA-27

## APPLICATION TO REQUEST A BENEFICIAL USE DETERMINATION

This form must be submitted with an application for a beneficial use in accordance with Section 22.54 of the Illinois Environmental Protection Act (Act). This application must include an original and three (3) photocopies of this form and all supporting information including any reports, plans specifications etc. necessary to fully describe the activities proposed and to demonstrate compliance with the Act. Incomplete applications will be rejected. Please refer to the instructions for further guidance. If there is not enough in the space provided on the form, attach your responses on a separate sheet of paper following the application format. Section 22.54 can be viewed at <http://www.ipcb.state.il.us/SLR/TheEnvironmentalProtectionAct.asp>.

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### I. GENERAL INFORMATION

TYPE OF BENEFICIAL USE: Ingredient

LENGTH OF TIME:

We request this beneficial use determination be authorized for 5 years and 0 months. (The Illinois EPA cannot authorize a time period greater than 5 years.)

#### I.A DESCRIPTION OF THE BENEFICIAL USE:

Reclaimed asphalt shingles, blended with reclaimed asphalt pavement or other crushed coarse aggregate, is a cost effective way to improve dust control, surface stabilization, patching maintenance, and private aggregate pavement projects. See attached.

### II. SITE IDENTIFICATION

#### A. MATERIAL GENERATOR INFORMATION

Site Name: Romeoville RAS Recycle Center Site # (IEPA): 1970905199  
Physical Site Address: 5 S. Material Road County: Will  
City: Romeoville State: IL Zip Code: 60446

##### SITE OWNER

Name: Southwind RAS I, LLC  
Address: 2250 Southwind Blvd  
City: Bartlett State: IL Zip: 60103  
Contact Name: M. Slade O'Keefe  
Phone #: 630-233-5700

##### SITE OPERATOR

Name: Southwind RAS I, LLC  
Address: 2250 Southwind Blvd  
City: Bartlett State: IL Zip: 60103  
Contact Name: M. Slade O'Keefe  
Phone #: 630-233-5700

#### B. MATERIAL USER INFORMATION

Site Name: Bluff City Construction, LLC Site # (IEPA): \_\_\_\_\_  
Physical Site Address: 2250 Southwind Blvd County: Cook  
City: Bartlett State: IL Zip Code: 60103

##### SITE OWNER

Name: Bluff City Construction, LLC  
Address: 2250 Southwind Blvd  
City: Bartlett State: IL Zip: 60103  
Contact Name: Matthew P. Vondra  
Phone #: 630-497-8700

##### SITE OPERATOR

Name: Bluff City Construction, LLC  
Address: 2250 Southwind Blvd  
City: Bartlett State: IL Zip: 60103  
Contact Name: Matthew P. Vondra  
Phone #: 630-497-8700



**III. AFFIDAVITS**

The following affidavits must be included in your request:

- A. An affidavit or certification, from the generator, that the characteristics and method of generation of the material described in the application is accurate. (Original signatures required. Signature stamps or applications transmitted electronically or by facsimile are not acceptable.)
- B. An affidavit or certification from the product manufacturer or end user that the description of the storage and use of the material by the manufacturer or end user described in the application is accurate.
- C. If applicable, an affidavit or certification from the intermediate management facility such as a marketer that the description of the storage and use of the material by the intermediate facility described in the application is accurate.

**IV. DESCRIPTION OF THE PROCESS GENERATING THE MATERIAL:**

See additional text

---

**V. DESCRIPTION OF LOCATION OF THE INTERMEDIATE STORAGE AND PROCESSING OF THE MATERIAL:**

None-no intermediate facility will be used

---

**VI. JUSTIFICATION THAT THE MATERIAL IS LEGITIMATELY USED BENEFICIALLY AS DEFINED IN SEC. 22.54 (a)(3) OF THE ACT AND THAT IT IS USED AS AN EFFECTIVE SUBSTITUTE FOR A COMMERCIALY AVAILABLE MATERIAL:**

Materials in asphalt shingles are used in the production of aggregate pavement. See additional text for production cost.

---

**VII. IDENTIFICATION OF ANY OF THE HAZARDOUS CONSTITUENTS AND AN EXPLANATION WHY THE CONCENTRATION OF EACH CONSTITUENT AND THE MATERIAL'S MANAGEMENT AND USE WILL NOT NEGATIVELY IMPACT HUMAN HEALTH, SAFETY AND THE ENVIRONMENT:**

No solvent or chemicals are used to process liquid asphalt in shingles, therefore no hazardous constituents are present.

---

**VIII. CHEMICAL AND PHYSICAL ANALYSIS: (ATTACH TO THE APPLICATION)****IX. IF THE MATERIAL IS APPLIED TO THE LAND, A DISCUSSION OF THE SITE-SPECIFIC GEOLOGY AND THE POTENTIAL FOR CONSTITUENTS OF THE MATERIAL TO MIGRATE TO GROUNDWATER: (ATTACH TO THE APPLICATION)****X. VOLUMES AND TIMEFRAMES FOR USE OF THE MATERIAL AND ANY RESULTING PRODUCTS CONTAINING THE SUBSTITUTE MATERIAL. JUSTIFICATION FOR THE VOLUMES AND TIMEFRAMES FOR STORAGE AND PROCESSING THAT WERE SELECTED: (ATTACH TO THE APPLICATION)****XI. OTHER INFORMATION: (ATTACH TO THE APPLICATION)****XII. SIGNATURES: (Original signatures required. Signature stamps or applications transmitted electronically or by facsimile are not acceptable.)**

The application must be signed by the person responsible for using the material or processing the material into a product that is marketable to the general public. All applications shall be signed by the person designated below as a duly authorized representative of the applicant.

1. Corporation – By a principal executive officer of at least the level of vice president.
2. Partnership or Sole Proprietorship – By a partner or proprietor, respectively.
3. Government- by either a principal executive officer or a ranking elected official.

A person is a duly authorized representative of the applicant only if: (1) they meet the criteria above or the authorization has been granted in writing by the person described above; and (2) is submitted with this application.

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I hereby affirm that all information contained in this application is true and accurate to the best of my knowledge and belief.

I do herein swear that I am duly authorized representative of the applicant and I am authorized to sign this application form.

# APPLICANT

Signature: \_\_\_\_\_

Date: 03/20/2025

Name: M. Slade O'Keefe

Title: Manager

Company Name: Southwind RAS I, LLC

Address: 2250 Southwind Blvd

City: Bartlett

State: IL

Zip Code: 60103

Phone: 630-233-5700

# ENGINEER

Signature: \_\_\_\_\_

Date: 3/18/25

Name: Gregory W. Wilcox

Title: President - Winston Engineering

Address: 2250 Southwind Blvd.

City: Bartlett

State: IL

Zip Code: 60103

Phone: 630-917-1158



"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))"

I.A DESCRIPTION OF THE BENEFICIAL USE: (additional text)

See additional text.

IV. DESCRIPTION OF THE PROCESS GENERATING THE MATERIAL: (additional text)

See additional text.

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V. DESCRIPTION OF LOCATION OF THE INTERMEDIATE STORAGE AND PROCESSING OF THE MATERIAL:  
(additional text)

See additional text.

VI. JUSTIFICATION THAT THE MATERIAL IS LEGITIMATELY USED BENEFICIALLY (additional text)

See additional text.

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VII. IDENTIFICATION OF ANY OF THE HAZARDOUS CONSTITUENTS (additional text)

See additional text.

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PERMIT SECTION

# Southwind RAS I, LLC

General Information/Site  
Identification

## SECTION 2:

### Site Identification

- Attachment 1:  
Description of Beneficial  
Use



**Attachment 1 - DESCRIPTION OF THE BENEFICIAL USE:**

Historically speaking, due to price fluctuations in asphalt cement, asphalt mix users in the U.S. have had to seek ways of reducing or extending the virgin asphalt cement they use in their products with continued industry emphasis on quality and environmental assurances. The most practical approach has been to use the binder available in reclaimed asphalt pavement (RAP) and reclaimed asphalt shingles (RAS). Industry has long realized the value of RAP for saving money and conserving resources. More recently the industry has also come to realize the value of asphalt shingles since they contain anywhere from 19 to 36 percent of liquid asphalt (Townsend, Powell, & Su, 2007). Therefore, even a small percentage of shingles can have a significant effect on the amount of new asphalt binder added to a mix design. Asphalt shingles also contain other materials, including fibers, fine aggregate and mineral filler which are also commonly used in asphalt mixtures.

Asphalt roofing shingles constitute nearly two-thirds of the roofing market for both new homes and roof replacements. Roof installation generates an estimated 7-10 million tons of shingle tear-off waste and installation scrap annually. U.S. manufacturing plants generate another 750,000 to 1 million tons of manufacturing shingle scrap (NAHB Research Center, 1998). This represents over 2 million tons of liquid asphalt available for use in asphalt paving mixtures, or a replacement of almost 9 percent of the current national need for liquid asphalt in pavement construction.

Reclaimed Asphalt Shingles (RAS), when mechanically blended with Reclaimed Asphalt Pavement (RAP) or other crushed coarse aggregate, is a cost-effective and sustainable way to improve unpaved rural county roadways and gravel parking lots to better control dust and stabilize unpaved roadway surfaces. In addition, this blend also improves private pavement developments by reducing permeability to create a stronger, better engineered structure. This process, which includes the same materials used in typical asphalt production, also eliminates the higher costs associated with using virgin materials.

# Southwind RAS I, LLC

---

Certifications/Affidavits

## SECTION 3:

### Affidavits:

- Source / Supplier
- Generator
- End User



STATE OF ILLINOIS )  
 ) SS.  
 COUNTY OF KANE)

**Affidavit of Beneficial Use Determination**

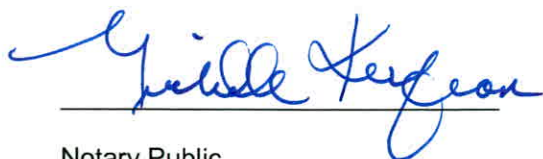
I, M. Slade O'Keefe, being first duly sworn under oath, state and depose as follows:

- 1.0 That I am an Officer of Southwind RAS I, LLC, an owner of the subject processing facility identified in IEPA LPC-PA-27 and located at 5 S. Material Road, Romeoville, Illinois.
- 2.0 That RAS, when separated from other materials and used as a raw material, will meet the specifications for the RAS product as identified in Illinois State Toll Highway and/or Illinois Department of Transportation and/or city, county, or other municipal agency designs which may utilize the same or similar specifications as the Illinois State Toll Highway Authority and/or the Illinois Department of Transportation. RAS may also be used in private aggregate pavement projects in accordance with the design and specifications approved by an Illinois Licensed Professional Engineer.
- 3.0 That in said capacity I have reviewed the application and have personal knowledge of the operations of said property sufficient to execute this affidavit.
- 4.0 That on behalf of the "Generator" the characteristics and method of generation of the materials as described in the application is true and accurate to the best of my knowledge.

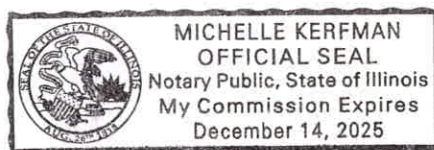


M. Slade O'Keefe

Subscribed and sworn to before me  
 this 20<sup>th</sup> day of March 2025.



Notary Public



STATE OF ILLINOIS )

) SS.

COUNTY OF KANE)

**Affidavit of Beneficial Use Determination**I, M. Slade O'Keefe, being first duly sworn under oath, state and depose as follows:

- 1.0 That I am an Officer of Southwind RAS I, LLC, the site operator for the material end-user identified in IEPA LPC-PA-27 and located at 2250 Southwind Blvd, Bartlett, Illinois.
- 2.0 That the reclaimed asphalt shingles will be processed in accordance with any State, ISTHA, City, County, Township or approved engineered designs and will be mechanically blended with reclaimed asphalt pavement or other crushed coarse aggregate for the purpose of being used as an asphalt aggregate blend for dust control purposes and general roadway or aggregate pavement structure improvement and stabilization in accordance with the "Reclaimed Asphalt Shingles (RAS) – RAP or Other Crushed Coarse Aggregate Blend for Aggregate Pavement Sections, Dust Control, Stabilization, Patching, and Private Aggregate Pavement Developments" specification, or in accordance with the design and specifications approved by an Illinois Licensed Professional Engineer in private pavement development applications.
- 3.0 That in said capacity I have reviewed the application and have personal knowledge of the operations of said property sufficient to execute this affidavit.
- 4.0 That on behalf of the "End User" the description of the storage and use of the material by the manufacturer or end user described in the application is true and accurate to the best of my knowledge.



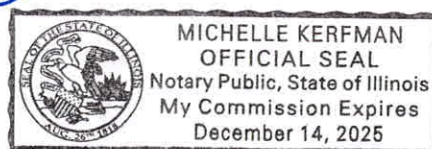
M. Slade O'Keefe

Subscribed and sworn to before me  
 this 20th day of March 2025.



Notary Public

Southwind RAS I, LLC



March 2025

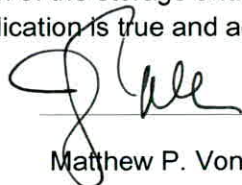
STATE OF ILLINOIS)

) SS.

COUNTY OF KANE)

**Affidavit of Beneficial Use Determination**I, Matthew P. Vondra, being first duly sworn under oath, state and depose as follows:

- 1.0 That I am an Officer of Bluff City Construction, LLC, the owner of the material user identified in IEPA LPC-PA-27 and located at 2250 Southwind Blvd., Bartlett, Illinois.
- 2.0 That the use of a recycled shingle and asphalt pavement blend on roadways, alleys, and parking lots is for dust control purposes and general roadway or pavement structure improvement and stabilization, or in accordance with the design and specifications approved by an Illinois Licensed Professional Engineer in private pavement development applications as identified in the IEPA LPC-PA-27 application and attached hereto.
- 3.0 That the incoming processed shingles will be processed in accordance with any State, ISTHA, City, or County approved mix designs and will be distributed for the purpose of being used for dust control purposes and general roadway or private pavement structure improvement and stabilization which meets the enclosed specifications.
- 4.0 That in said capacity I have reviewed the application and have personal knowledge of the operations of said property sufficient to execute this affidavit.
- 5.0 That on behalf of the "End User" the description of the storage and use of the material by the manufacturer or end user described in the application is true and accurate to the best of my knowledge.

 3.20.2025  
Matthew P. Vondra

Subscribed and sworn to before me

this 20<sup>th</sup> day of March 2025.



Notary Public





# Southwind RAS I, LLC

---

Process Description

## SECTION 4:

### Description of the Process Generating the Material

- Process Description
- Proposed Site Plan
- Proposed Equipment Plan

#### ***IV. DESCRIPTION OF THE PROCESS GENERATING THE MATERIAL:***

##### **RAS Material Description & Generation**

Existing Reclaimed Asphalt Shingles (RAS) processed in accordance with BUD No. BUD20-016 & BUD No. BUD11-013-R2 will be used in this aggregate mix design. The "Reclaimed Asphalt Shingles (RAS) – RAP or Other Crushed Coarse Aggregate Blend for Aggregate Pavement Sections, Dust Control, Stabilization, Patching, and Private Aggregate Pavement Developments" specification will be used in this application. For this application, the portable grinder will grind and shred shingles into a product approximately 1-inch in size, instead of 3/8-inch size. The Reclaimed Asphalt Pavement (RAP) will consist of grindings in 1.5-inch size or less. The RAS and Aggregate will be mechanically blended at a pre-determined ratio in accordance with the engineering specifications for the specific project.

The final blended product will be brought to the project area to be used for both an aggregate subbase or aggregate surface. Only the blend or RAS volume necessary will be shipped to the project site and temporarily stored until installation. Unused material will be retained by the end-user for minor roadway or pavement structure maintenance patching, stored for the next project location, or shipped back to the point of origin. The RAS / Aggregate mixture will only be used in a manner that is protective of human health, safety, and the environment and in compliance with applicable state and federal law.

The RAS used in this application will undergo the same acceptance, processing, and final product shipment procedures laid out in the above referenced BUD. There are no other deviations or changes from the original BUD application language.

##### **RAS Material Description & Generation**

The RAP will be generated from various asphalt producers and contractors in the area. Specifically, the RAP will be generated from Illinois Department of Transportation (IDOT), County, Municipal and Private Hot Mix Asphalt (HMA) paved surfaces as part of new and ongoing projects let by these agencies. Southwind RAS can obtain affidavits from the generators/suppliers of the RAP that will be received at the facility. These affidavits will be retained by the facility and kept as part of the site's operating record which will track the inbound and outbound quantities of RAP. Southwind RAS will adhere to the acceptance procedures for RAP enclosed with this application.

Southwind RAS will grind the RAP on-site using a feeder, crusher and a screen. The grinding will all be located on a dedicated non-earthen surface separate from other areas of the facility. The attached drawing shows the proposed location of the equipment, materials, and stockpiles of finished products at the site.

Upon completion of material processing, Southwind RAS will blend the RAS, RAP, and crushed aggregate on-site using a mobile equipment fed blending bin and trommel. The blending will all be located on a dedicated non-earthen surface separate from other areas of the facility. The attached drawing shows the proposed location of the equipment, materials, and stockpiles of finished products at the site.

Southwind RAS will store small quantity piles of both ground RAP and final blended product on-site. Both stockpiles will be stored on dedicated non-earthen surface separate from other areas of the facility, and in accordance with the facility's best management practices. Inbound and outbound tonnages will be recorded to ensure maximum storage volumes are not exceeded. The attached drawing shows the proposed locations of the stockpiles along with an estimated size (in tons) of each pile.

Estimated tonnages for the stockpiles shown in the drawing are as follows:

- Raw asphalt stockpile can store approximately 3,000 to 5,000 tons (assuming pile height of 10 feet).
- Ground RAP stockpile can store a maximum of approximately 3,500 tons (assuming pile height of 15 feet)
- Each FM-98 bin can store a maximum of approximately 900 tons
- Each RAP/RAS/Aggregate blend bin can store a maximum of approximately 900 tons





# Southwind RAS, LLC

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## **RAP (Reclaimed Asphalt Pavement) Load Inspection Procedures**

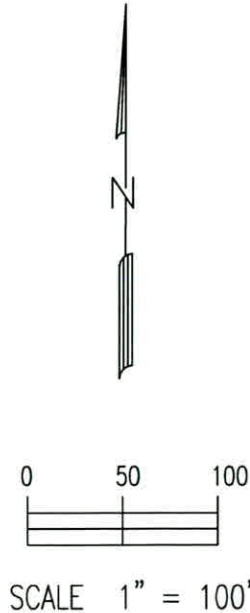
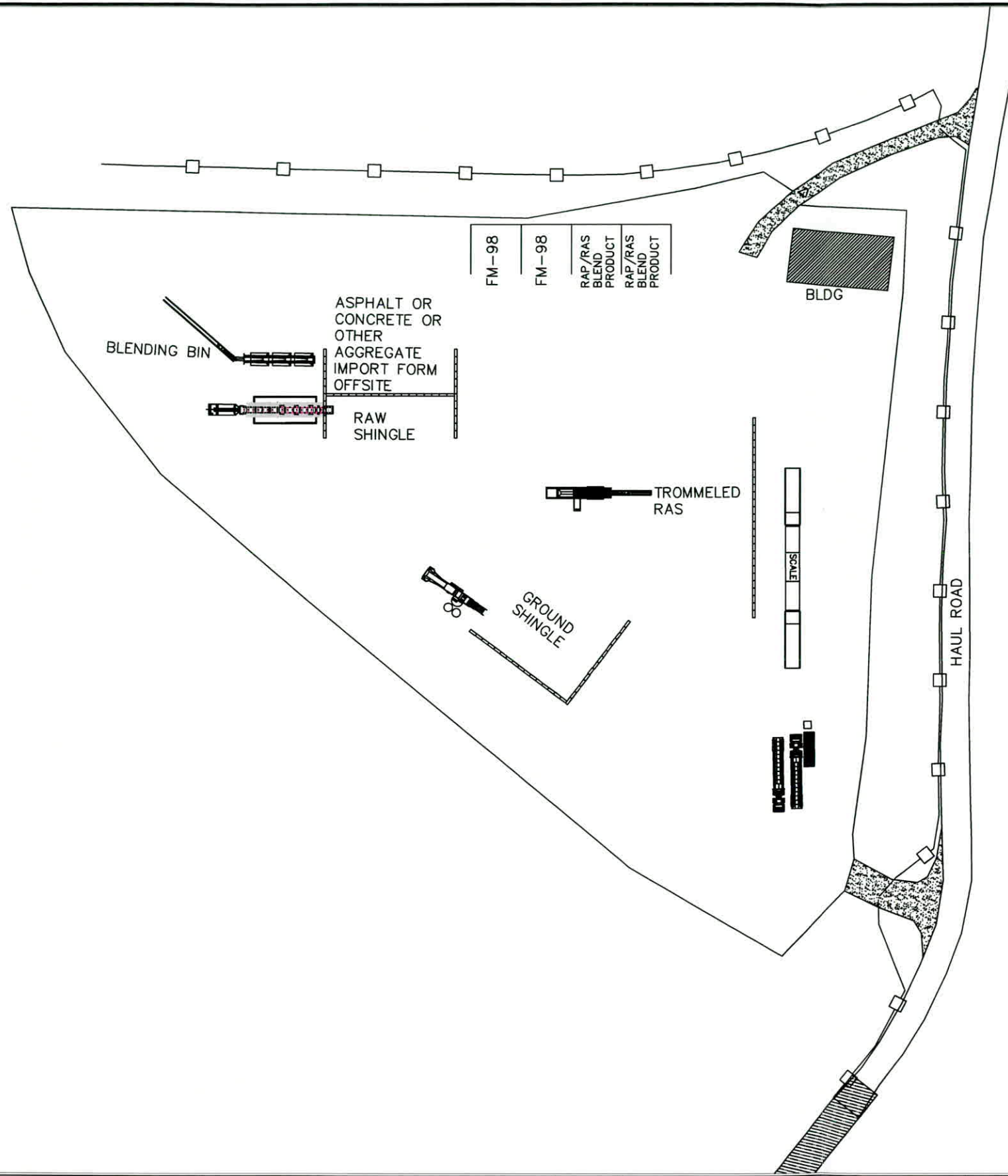
### **Load Checking**

A visual inspection is performed by trained personnel on each load upon arrival at the facility. The load is visually inspected to ensure that only clean, broken reclaimed asphalt pavement (RAP) is present without any non-conforming materials such as garbage, more than an incidental amount of soil, or fabric materials attached to the RAP. Loads containing non-conforming materials or fresh hot-mix asphalt (HMA) will not be accepted. If the lining of the truck bed is treated with chemicals in any way, the load will not be accepted.

### **Documentation**

Each load of RAP material imported to the site is inspected and documented through individual load tickets. Each load ticket will contain the following information: date, time, customer name, vehicle name, vehicle identification number, and the address or location of the source of the RAP, and the quantity of material received.

Documentation will be retained on site for a period of one year.



PREPARED BY:  
**Southwind RAS, LLC**  
2250 SOUTHWIND BOULEVARD  
BARTLETT, ILLINOIS 60103  
PHONE: 630-233-5700 FAX: 630-524-9020

PREPARED FOR:

DESIGNED	AKG	OWNER	xxx
DRAWN	AKG	Proj Type	xxx
APPROVED		Proj #	xxx
DATE	03-19-25	Folder	xxx
SCALE	1/100	File	xxx
DATE	DESCRIPTION OF REVISION		BY

**NOTICE**  
This print and its contents are the property of Bluff City Materials, Inc., and is subject to return upon demand and is not to be used in any way that could be considered to be detrimental to their interests.  
**TOLERANCES (EXCEPT AS NOTED)**

Location  
**ROMEOVILLE**  
Title  
ROMEOVILLE RAP/RAS PLANT LAYOUT

SHEET  
**1**



# Southwind RAS I, LLC

---

## SECTION 5:

- This section intentionally left blank.

Section 5: N/A

# Southwind RAS I, LLC

---

## SECTION 6:

- Justification of Use

Justification of Use

## **VI. JUSTIFICATION THAT THE MATERIAL IS LEGITIMATELY USED BENEFICIALLY:**

Reclaimed Asphalt Shingles (RAS), when mechanically blended with Reclaimed Asphalt Pavement (RAP) or other crushed coarse aggregate, is a cost-effective and sustainable way to improve currently unpaved rural and county roadways to better control dust and stabilize roadway surfaces. This process, which includes the same materials used in typical asphalt production, also eliminates the higher costs associated with using virgin materials. The final RAS / Aggregate roadway will consist of a mechanically blended mixture of RAS and Aggregate. As shown below, the cost savings using of using a mechanically blended mixture of RAS and Aggregate is, on average, approximately \$68.36 per ton cheaper than hot-mix asphalt (82%).

### **Roadway Improvement Costs Using Hot-Mix Asphalt**

Description / Material	Unit Cost
Fine Grade / Roadway Prep	\$3.52 / ton
2-inch Hot-Mix Asphalt Surface (N50)	\$79.87 / ton
Total Cost	<b>\$83.39 / ton</b>
*Optional – add 2.5-inch HMA binder course layer at \$58.13 / ton	\$125.95 / ton

### **Pavement Structure Improvement Costs Using RAS / Aggregate Mixture**

Description / Material	Unit Cost
Fine Grade / Prep	\$1.25 / ton
6-inch Aggregate / RAS Blend Layer	\$13.78 / ton
Total Cost	<b>\$15.03 / ton</b>

## **ALTERNATIVE USES**

Alternative uses or materials that can be used to control dust include calcium chloride or other roadway surfactants. These short-term or temporary solutions come with a high cost and are ineffective when compared to the RAP / Aggregate blend process. The mixture of RAS / Aggregate has an approximate life expectancy of ten (10) years.

# Southwind RAS I, LLC

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## SECTION 7:

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# Southwind RAS I, LLC

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## SECTION 8:

- Chemical Analysis

**VIII. CHEMICAL AND PHYSICAL ANALYSIS:****COMPOSITION / INFORMATION ON INGREDIENTS**

<b>CAS #</b>	<b>Component</b>	<b>Percent</b>
Not Available	Mineral Granules (Granules may consist of: feldspar, crystalline silica in the form of quartz, pyroxene, sodium silicate, kaolin, iron oxide, chromium oxide (trivalent chromium), hydrotreated heavy naphthenic petroleum distillate, titanium dioxide, zinc ferrite, carbon black, aluminum oxide, amorphous silica, calcium oxide, magnesium oxide and nickel)	30 - 45
1317-65-3	Limestone	15 - 45
8052-42-4	Petroleum Asphalt (Asphalt fumes are not released unless this product is heated to above 250°F)	15 - 34
14808-60-7	Crystalline Silica (Quartz)	1.5 - 10
14807-96-6	Talc (containing no asbestos)	< 10
65997-17-3	Continuous filament fiber glass (encapsulated)	1.5 - 3

**Component Information/Information on Non-Hazardous Components**

The products listed above are articles as defined by the OSHA Hazard Communication Standard at 29 CFR 1910.1200. The product's end-use is dependent upon its manufactured shape and design, and under normal conditions of use, it does not release chemicals that present a physical or health hazard. These products do not contain any form of asbestos material.



# Southwind RAS I, LLC

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## SECTION 9:

- This section intentionally left blank.

# Southwind RAS I, LLC

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## SECTION 10:

- Volumes and Timeframes



## **X. VOLUMES AND TIMEFRAMES:**

Asphalt shingle recycling has been identified as possessing a market potential greater than most other components of construction and demolition (C&D) debris. Currently, Hot Mix Asphalt (HMA) is the largest recycling market for reclaimed asphalt shingles. Because of its adhesive characteristics, flexibility, and ability to form strong cohesive mixtures with mineral aggregates, asphalt is widely used in the HMA industry for producing paving materials. Asphalt shingle recycling will not only reduce the requirement for the virgin materials that the shingles are replacing (e.g., asphalt and aggregate in the HMA market), but will also reduce the consumption of landfill airspace.

Existing Reclaimed Asphalt Shingles (RAS) processed in accordance with BUD No. BUD20-016 & BUD No. BUD11-013-R2 will be used in this RAS / Aggregate pavement mix design. This alternative use of the final RAS product will help reduce the total volume of material stored across all Southwind RAS facilities.

## **DEMAND & FORECAST**

The specification for the RAS / Aggregate blend has been utilized across a number of pilot projects in various townships, municipalities and privately owned developments in Illinois over the last several years. Below is a summary of these projects for reference:

- The RAS / Aggregate blend was used on several roadways in Blackberry and Kaneville Townships. Material was installed over approximately 12,000-feet of roadway with an average width of 18 to 20-feet and a thickness of 3 to 4-inches. These projects used approximately 3,000 tons of RAS, and typical roadway projects such as this can require anywhere between 700 and 1,500 tons of RAS per section.
- The RAS / Aggregate blend was used on several roadways with the City of Peoria Public Works Department as well as Morton and Washington Townships. There were multiple RAS / FRAP blend options used to address the various needs within each entity's infrastructure, as outlined in the enclosed specification document.
  - Southwind is working with Winnebago County and other rural highway departments to provide this product for un-paved roadways.
- The RAS / Aggregate blend is suitable for use in privately-owned, large-scale parking lot development applications to achieve the same results as hot-mix asphalt at a substantially reduced cost. There is a significant market for private RAS / Aggregate pavement structure developments (i.e. parking lots) created, in part, through the successful publicly approved projects referenced above. This blend of recycled asphalt and aggregate pavement, when used in accordance with the specification outlined in this application, will provide private developers with the same benefits realized in publicly funded projects.

With regard to anticipated demand and forecast for use of RAS in accordance with the specification outlined in this application, across all Southwind RAS locations, below is an estimate of outbound sales over the next 2 years:

2025

<b>Southwind RAS Facility</b>	<b>Facility Location</b>	<b>Estimated RAS Volume</b>
Bartlett	Bartlett, IL	20,000 tons
Lorang Road	Elburn, IL	3,500 tons
South Beloit	South Beloit, IL	1,000 tons
Peoria	Peoria, IL	500 tons
Lake in the Hills	Lake in the Hills, IL	4,000 tons
Thornton	Thornton, IL	4,800 tons
Romeoville	Romeoville, IL	5,000 tons

2026

<b>Southwind RAS Facility</b>	<b>Facility Location</b>	<b>Estimated RAS Volume</b>
Bartlett	Bartlett, IL	5,000 tons
Lorang Road	Elburn, IL	3,500 tons
South Beloit	South Beloit, IL	500 tons
Peoria	Peoria, IL	N/A
Lake in the Hills	Lake in the Hills, IL	4,000 tons
Thornton	Thornton, IL	4,800 tons
Romeoville	Romeoville, IL	5,000 tons

# Southwind RAS I, LLC

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## SECTION 11:

- Other Information:
  - RAS Best Management Practices



**SUBJECT:** RECLAIMED ASPHALT SHINGLES (RAS) – RAP OR OTHER CRUSHED COARSE AGGREGATE BLEND FOR AGGREGATE PAVEMENT SECTIONS, DUST CONTROL, STABILIZATION, PATCHING, AND PRIVATE AGGREGATE PAVEMENT DEVELOPMENTS

**DEFINITIONS:**

**Asbestos Containing Material (ACM)** – Any material containing more than one percent (1%) asbestos as determined using the method specified in Appendix A, Subpart F, 40 CFR Part 763, Section 1, Polarized Light Microscopy.

**Asbestos Free** – Asbestos is not detectable using Polarized Light Microscopy.

**Asphalt Shingles** – A roof shingle mat of fibers impregnated with asphalt covered with aggregate.

**BUD (Beneficial Use Determination)** – Written conditional exemption from Illinois EPA under the authority of Section 22.54 of the Illinois Environmental Protection Act (415 ILCS 5/22.54) that specifically exempts a Source that is providing Post Consumer shingles from Illinois EPA solid waste permit requirements.

**Department** – County Department of Transportation

**Fractioned RAP (FRAP)** – FRAP shall consist of screened RAP

**Local Agency** – Municipality, County, Township or Local Road District

**Illinois EPA** – Illinois Environmental Protection Agency

**NESHAP** – National Emission Standards for Hazardous Air Pollutants

**Manufacturer's Salvaged Shingles** – Asphalt shingles, tabs, and end runs salvaged directly from a shingle manufacturer.

**Other Crushed Coarse Aggregate** – Consists of limestone, natural gravel, reclaimed asphalt pavement or recycled concrete with angular fragments resulting from crushing by mechanical means and/or screened aggregates with final gradation ranging in particle size from the No. 200 Sieve to <6.0 inches.

**Paddock** – A fenced-in or walled enclosure that can be locked and/or sealed to prevent undocumented removal or addition of new material. This area shall have a surface suitable to prevent soil from contaminating the RAS.

**Pre-processed Shingles** – Manufacturer's Salvaged or Post-Consumer shingles that remain to be ground to Department specifications.

**Processed Shingles** – Manufacturer's Salvaged or Post-Consumer shingles meeting requirements herein that have been ground to Department specifications.

**Polarized Light Microscopy (PLM)** – Test method to identify asbestos following EPA 600/R-93/116.

**Post-Consumer Shingles (Tear-off)** – Shingles salvaged from residential buildings of four or fewer dwelling units and/or single-family dwellings not subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP). Shingles must be collected separately from other general construction or demolition debris at the generated source. Shingle from whole house demolition will not be allowed.

**Reclaimed Asphalt Pavement (RAP)** – RAP is the material produced by cold milling or other asphalt pavement removal methods.

**Reclaimed Asphalt Shingles (RAS)** – RAS is from the processing and grinding of pre-consumer or post-consumer shingles.

**Source** – Recycler/Processor who processes shingles for use in Hot Mix Asphalt (HMA) and is authorized by the Illinois EPA and approved by the Department

**State** – Illinois

**Stockpile** – Pile of pre-processed shingles limited in size by the Illinois EPA BUD or Permit

**Supplier** – An individual or business that brings shingles into the facility for the production of RAS.

Direct suppliers can be:

- Roofing Company
- Homeowner

Indirect suppliers (must be listed in QC Plan):

- Construction/Demolition Recyclers
- Salvager from new shingle manufacturer

**Tipping Pad** – Designated paddock for unloading incoming loads of shingles prior to asbestos sampling.

**Training** – An educational program specified to the job duties described in the quality control plan. The education program shall include specific position responsibilities and the type of training required. For positions that require asbestos training, the education program shall be developed for the specific methods being used by the Source and presented by licensed specialists knowledgeable in the safe handling, usage and disposal of this material.

## **1.0 PURPOSE**

- 1.1 To establish a procedure whereby the Reclaimed Asphalt Shingle (RAS) production of a Source will be conducted in accordance with applicable environmental laws and regulations in a manner that results in a product that may be accepted for use on State, Local Agency or private development projects. This policy shall be referenced with all applications for Illinois Environmental Protection Agency (Illinois EPA) permits (Bureaus of Air, Land and Water) or for applications of BUD permits required to operate a RAS processing facility.

## **2.0 SCOPE**

- 2.1 This procedure shall apply to all Sources which desire to supply RAS for incorporation into RAP (Reclaimed Asphalt Pavement or other crushed coarse aggregate) for aggregate pavement section road projects, dust control, private aggregate pavement or structure developments, and stabilization purposes in accordance with the design and specification approved by an Illinois Licensed Professional Engineer.

## **3.0 SPECIFICATION**

- 3.1 RAS - RAS is from the processing and grinding of pre-consumer or post-consumer shingles. RAS shall be a clean and uniform material with a maximum of 0.5 percent unacceptable materials. All RAS used shall be ground and processed to 95 percent passing the 1-inch sieve based on a dry shake gradation.
- 3.2 RAP - Shall be reclaimed asphalt product, crushed or screened to produce a finished product with 100 percent passing the 1.5-inch sieve.
- 3.3 Blended Product – The final RAS-RAP / Aggregate road blend will be mechanically blended to meet the Illinois Professional Engineer design specifications.



#### **4.0 INSTALLATION**

- 4.1 RAS-RAP aggregate blend for aggregate pavement sections shall be installed in a uniform lift and compacted per Exhibit A.
- 4.2 RAS-RAP aggregate blend for pavement patching shall be blended mechanically for use per Exhibit B.
- 4.3 RAS blended with existing aggregate surface material shall be blended and placed per Exhibit C.

#### **5.0 BUD permit from the Illinois EPA**

- 5.1 Only RAS from a facility with an IEPA approved BUD shall be used in the RAS / RAP or other crushed coarse aggregate mixture.

#### **6.0 RAS Facility Best Management Practices**

The intent of this document is to summarize the environmental and process controls for recycling post-consumer reclaimed asphalt shingles at the RAS Facility, subject to the parameters outlined under a beneficial use determination ("BUD") (415ILCS 5/22.54).

1. Incoming loads of post-consumer asphalt shingles will be inspected and accepted or rejected by the onsite Illinois Certified Asbestos Inspector, trained to identify potential asbestos containing materials and other unacceptable wastes and materials. Loads identified by the Illinois Certified Asbestos Inspector as containing potential asbestos containing materials will be rejected. Acceptance and rejection of the incoming loads will be recorded, and records will be maintained electronically.
2. A list of unacceptable items will be displayed at the point of inspection (see Exhibit - Supplier List of Acceptable and Unacceptable Materials)
3. Training of the suppliers and processing facility personnel on acceptable and unacceptable materials will be completed by an Illinois Certified Asbestos Inspector. The goal of the training is to achieve separation of unacceptable materials at the source of the clean loads or to train personnel at mixed load facilities to sort shingles in the manner required. Training materials are attached which describes training required for all parties in the process. Training documents will be updated as necessary.
4. Environmental Control
  - a. The initial 100 loads or 1000 tons (whichever is met first) of pre-processed tear-off asphalt shingles will be sampled and tested for asbestos containing materials every 10/tons according to IEPA current standards and procedures.
    - i. Each load will be weighed, ticketed, and stockpiled separately in an assigned area.

- ii. Representative samples of the asphalt shingle material will be collected according by the onsite Illinois Certified Asbestos Inspector. Representative samples will include different colors and patterns present.
  - iii. Samples will be tested according to IEPA current standards and procedures for ACM using "Polarized Light Microscopy" (PLM).
  - iv. Only material certified as non-hazardous for asbestos will be incorporated into the feed material.
  - v. In the event that asbestos is not detected through PLM in the first 100 loads or 1000 tons of post-consumer pre-processed material, in-bound sampling protocol will be reduced to 2 samples for every 250 tons inbound. This frequency of testing may be modified in future as determined by IEPA.
  - vi. In the event that asbestos is detected through PLM in the first 100 loads or 1000 tons of post-consumer pre-processed material, loads identified as hazardous asbestos containing materials will be rejected and properly disposed of at a landfill.
- b. The initial 1000 tons of post-processed post-consumer asphalt shingles will be tested after processing for ACM content.
- i. ACM testing of the initial 1000 tons will occur at a rate of 1 PLM test/100 tons.
  - ii. Test results confirming the material is non-hazardous for asbestos, will be obtained prior to commingling the material with stockpiled product.
  - iii. After the first 1000 tons, testing will be completed at a rate of 1 PLM test for every 500 tons of produced. This frequency of testing may be modified in future as determined by IEPA.

5. Air monitoring Plan

- a. An initial exposure assessment (personal breathing zone air sampling) for asbestos fibers will be conducted in the breathing zone of each specific task by a certified industrial hygienist (CIH) during the grinding of the asphalt shingles within the first month of processing. The assessment will include samples collected at 30-minute, 4-hour, and 8-hour durations. Samples will be analyzed by PLM or Phase Contrast Microscopy (PCM), and results are not to exceed 0.1 fibers per cubic centimeter. Samples requiring further analysis will be analyzed using Transmission Electron Microscopy (TEM), which differentiates and counts only asbestos fibers. Documentation of the results will be maintained on-site and will be made available to the IEPA Asbestos Unit Program Manager upon request.
- b. Exposure assessments will be conducted bi-annually the first year and then annually thereafter under the supervision of the certified industrial hygienist for



each task identified. This frequency and type of testing may be modified in future as determined by IEPA.

6. Quality Control and Processing

- a. Quality Testing will be completed on processed product, ready for use, to ensure the product characteristics are representative and meet customer requirements.
- b. Processing production logs will be completed to indicate the quantities of material sorted ground, tested as non- hazardous ACM, and processed daily for final use in hot mix asphalt.

7. General Operating Guidelines

- a. Access to the facility will be controlled by a gated entrance and exit. The gate must be locked when facility personnel are not present.
- b. A sign will be posted at the entrance of the processing facility indicating the name of the facility and the hours of operation.
- c. Incoming loads will be inspected by the on-site Illinois Certified Asbestos Inspector familiar with the requirements and operation of the facility.
- d. Unloading of the post-consumer tear-off shingles will be confined to an approved designated "tipping area" paddock.
- e. Fencing at least 6 feet in height will be constructed to prevent windblown material from leaving the storage area.
- f. Storage shall be a minimum of 100' from waters of the U.S.
- g. A sort-line staffed by trained personnel will be used to remove deleterious materials from the clean shingles prior to processing.
- h. Unacceptable material separated from the shingles will be evaluated periodically to determine the amount of unacceptable materials entering the site from each supplier in order to reduce the amount of unacceptable materials entering the site.
- i. Stockpiles of incoming shingles, clean, sorted material ready for grinding, and ground RAS shall not exceed 10,000 tons, unless documentation (i.e. contracts, order requests, or letters of intent), from either an Illinois Highway Authority or private hot mix asphalt producer can be provided. Storage time will not exceed 18 months after shingles are received at BUD.
- j. The regulatory agencies will be allowed to conduct random visits to the facility.
- k. Clean loads, ready for processing, shall not exceed a cumulative total of 1.5% by weight of felt attached to shingles or other deleterious. This weight shall not include nails, which will be removed during processing.
- l. Grinding of clean, sorted material, ready for processing will be conducted using an industrial shingle grinder. The grinder will utilize water for dust control and to control temperature during the grinding process.

- m. During storms, heavy rain and/or high winds, production will be stopped until weather conditions allow for safe operation.
- n. MSDS – A material safety data sheet is provided for a sample shingle manufacturer. It is suggested that people handling RAS by hand should wear gloves and eye protection. Long sleeves are also suggested.

# Southwind RAS I, LLC

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## SECTION 12:

- RAS / FRAP Specification

Materials Specifications:

We are providing three material specifications for beneficial use of reclaimed shingles in various Aggregate / RAS blended applications.

1. Specification 01 – 70% - 30% Aggregate-RAS Blend for Aggregate Pavement Sections
2. Specification 02 – Pavement Patching Cold Patch Mix using Fractionated RAP (or other crushed aggregate) and RAS Blend
3. Specification 03 – RAS Blended with an Existing Aggregate Surface Course – for the purpose of Dust Control.

## Specification – 01

**Subject:** RAS Application – 70% - 30% Aggregate-RAS Blend for Aggregate Pavement Sections

**Description:** This work shall consist of furnishing and placing one or more courses of RAP or crushed aggregate blended with RAS, uniformly mixed, constructed and compacted in accordance with these specifications upon a prepared aggregate or soil base. The material shall be installed to meet the lines, grades, and cross sections as shown on the plans or as required by the Engineer.

**Materials:** RAP or crushed coarse aggregate materials shall be processed, well-graded and at minimum meet the gradation for CA-06. RAS shall be produced at an IEPA approved BUD facility with 100% passing the  $\frac{3}{4}$ " Sieve. Materials shall be mechanically blended utilizing a calibrated cold feed bin system and may consist of RAP, coarse aggregate, RAS, etc.

RAS shall be free of all nails.

RAS can either be Type I, Manufacturer's scrap, of Type II, Post-consumer tear-off waste.

**Drainage:** The method of construction shall include provisions for surface drainage of the prepared base.

**Application:** The RAS / RAP or other crushed coarse aggregate shall be applied uniformly to the existing prepared aggregate or soil base.

**EQUIPMENT:** All equipment and machinery used on the work shall be of sufficient size and in such mechanical condition as to meet the requirements of the work and produce satisfactory quality of work. RAS / RAP or other crushed coarse aggregate blend shall be graded, rolled and compacted. Material shall be compacted to the satisfaction of the property owner or Engineer.

Equipment which may be used: motor grader, dozer, smooth drum roller, pneumatic-tired roller, wheel loader, trucks, water truck and other equipment and tools necessary to complete the work.



## Specification - 02

**Subject:** RAS Application – Pavement Patching Cold Patch Mix using Fractionated RAP (or other crushed aggregate) and RAS Blend

**Description:** This work shall consist of furnishing and placing a blend of fractionated aggregate or other crushed aggregate and RAS for the purposes of pavement patch maintenance work.

**Materials:** FRAP or other aggregate materials shall be processed, reasonably well-graded from coarse to fine. Aggregate material that is gap-graded or single sized will not be accepted. RAS shall be produced at an IEPA approved BUD facility with 100% passing the  $\frac{3}{4}$ " Sieve. Emulsion should be at the direction of the Engineer. Materials shall be mechanically blended utilizing a calibrated cold feed bin system and may consist of FRAP, other crushed coarse aggregate, RAS, etc.

RAS shall be free of all nails.

RAS can either be Type I, Manufacturer's scrap, of Type II, Post-consumer tear-off waste.

**Application:** The blended RAP or other crushed coarse aggregate will be applied to the existing pavement maintenance area in a quantity to allow for safe travel over the area. The area will be cleaned using high volume, low-pressure air to clean the patch area of debris. The area will be coated with emulsion visually acceptable to the property owner and or Engineer. FRAP or other crushed coarse aggregate and blended with RAS will be shoveled and raked to fill patch area above the surface elevation.

**Equipment:** Duraco Durapatcher 125DJT or other equipment approved by the Engineer. The blended aggregate shall be rolled and compacted. Material shall be compacted to the satisfaction of the property owner or Engineer.

## Specification - 03

**Subject:** RAS Application – RAS Blended with an Existing Aggregate Surface Course – for the purpose of Dust Control.

**Description:** This work shall consist of furnishing and placing one or more courses of RAS aggregate upon an existing scarified aggregate surface course for the purpose of Dust Control. The material shall be installed to meet the lines, grades, and cross sections as shown on the plans or as required by the Engineer.

**Materials:** RAS shall be produced at an IEPA approved BUD facility with 100% passing the  $\frac{3}{4}$ " Sieve.

RAS can either be Type I, Manufacturer's scrap, of Type II, Post-consumer tear-off waste and shall be free of all nails.

**Drainage:** The method of construction shall include provisions for positive drainage.

**Application:** The RAS shall be applied uniformly on the scarified surface aggregate via truck dumped with the tailgate tightly chained to control spreading volume to achieve a uniform thickness of 1 to 2 inches. RAS should then be blended with the scarified surface gravel using a motor grader or road reclaimer.

If blending is completed via motor grader – starting at one side of the existing roadway edge and blading a windrow to the middle, then blading the opposite roadway edge to the middle, The contractor shall then blade the resulting blended windrow back across the roadway section to meet the lines, grades, and cross sections as shown on the plans or as required by the Engineer. This process should be repeated until the resulting mixture is homogenous and uniform in appearance to the satisfaction of the property owner or Engineer.

**Equipment:** RAS aggregate blended with scarified aggregate surface course shall be graded, rolled and compacted.

Equipment which may be used: motor grader and/or road reclaimer, smooth drum roller, pneumatic-tired roller, wheel loader, trucks, water truck and other equipment and tools necessary to complete the work.

I, Steven R. Kaminski, have reviewed these specifications and it is to the best of my knowledge and belief, true, accurate and complete. Further, Reclaimed Asphalt Shingles (RAS) when blended with Reclaimed Asphalt Pavement (RAP) or other crushed coarse aggregate for the purpose of being used as an aggregate base or aggregate surface coarse, will provide an aggregate pavement of equal structural performance as those constructed via conventional state, county, township and municipal specifications for aggregate pavements while providing superior dust suppression and erosion resistance characteristics.

Steven R. Kaminski

Printed Name



Signature of Licensed Professional Engineer

8-9-24

Date





# Southwind RAS I, LLC

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## SECTION 12:

### Signatures:

- IEPA 22.54 Certification (for a Legal Entity)
- IEPA 22.54 Certification (for a person)



# Illinois Environmental Protection Agency

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

## 22.54 Certification (for a Legal Entity) For Operating an Asphalt Shingle Recycling Operation or Site

*This form is for prior experience in operating an asphalt shingle recycling operation or site.*

You may complete this form online and save a copy locally before printing, signing and submitting it to the Illinois EPA at the address below. If you choose to complete this form manually, please type or print clearly.

Illinois Environmental Protection Agency  
Division of Land Pollution Control - #33  
22.54 Certification  
1021 North Grand Avenue East  
P.O. Box 19276  
Springfield, IL 62794-9276

Site Name: Southwind RAS I, LLC - Romeoville Recycling Facility IEPA BOL No.: 1970905199  
Applicant Name: Southwind RAS I, LLC  
Title: \_\_\_\_\_  
FEIN: 27-2142676  
Street Address: 2250 Southwind Blvd P.O. Box: \_\_\_\_\_  
City Bartlett State: IL Zip Code: 60103  
Permit Numbers (if applicable): \_\_\_\_\_

I. Has the applicant, or any of its owner or officers, ever owned or operated other asphalt shingle recycling operations or sites (anywhere) at anytime? If Yes, provide the information below. ☒ Yes ☐ No

Site Name: See Attached IEPA BOL No.: \_\_\_\_\_  
Applicant Name: \_\_\_\_\_  
Title: \_\_\_\_\_  
Street Address: \_\_\_\_\_ P.O. Box: \_\_\_\_\_  
City \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_  
Type of Material: \_\_\_\_\_  
Activity Type: \_\_\_\_\_

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PERMIT SECTION

II. All of the following questions need to be answered. If the answer to any of the following is yes, attach a copy of any final administrative or judicial determination.

- 1) Has the applicant or any of its owners or officers, ever been convicted of a violation of any federal, state, or local laws, regulations or ordinances governing the operation of any asphalt shingle recycling operation or site or CCDD facility or site? ☐ Yes ☒ No
- 2) Has the applicant or any of its owners or officers, ever been convicted in Illinois or any other state of any crime which is a felony under Illinois law, or been convicted of a felony in a federal court or been convicted in Illinois, another state or federal court of any of the following: forgery, official misconduct, bribery, perjury or knowingly submitting false information under any environmental law, regulation or permit term or condition? ☐ Yes ☒ No

This Agency is authorized to require this information under Section 4 and Title X of the Environmental Protection Act (415 ILCS 5/4 and 5/22). Failure to disclose this information may result in a civil penalty of not to exceed \$50,000 for the violation and an additional civil penalty of not to exceed \$10,000 for each day during which the violation continues (415 ILCS 5.42). This form has been approved by the Forms Management Center.

- 3) Has the applicant or any of its owners or officers, ever been proven to have shown gross carelessness or incompetence in the handling, storing, processing, transporting, disposing of, or recycling asphalt shingles in any state?

☐ Yes ☒ No

III. Is there any administrative or judicial proceeding, which is still pending, which:

- 1) Could result in a determination of the type described in Section II above;

or ☐ Yes ☒ No

- 2) Could result in the reversal of any administrative or judicial determination provided in response to section II above.

☐ Yes ☒ No

If the answer to any of the above is yes, please provide a description including the name of the Agency or Court, title, docket No. and status below. The box below will expand as needed. Attach additional sheets as needed.

#### **AUTHORIZATION FOR RELEASE OF INFORMATION**

The undersigned authorizes any representative of the Illinois Environmental Protection Agency bearing this release to obtain any information from the Illinois State Police pertaining to the criminal records of the applicant and hereby directs the Illinois State Police to release such information upon request of the bearer. The undersigned authorizes a review of and full disclosure of all records, or any part thereof, concerning the applicant's criminal records by an to a duly authorized agent of the Illinois Environmental Protection Agency, whether said records are of public, private, or confidential nature. The intent of this authorization is to give consent for full and complete disclosure of the applicant's criminal records. The undersigned fully understands that any information which is developed directly or indirectly, in whole or in part, as a result of this authorization will be considered in determining whether a permit shall be issued by the Illinois Environmental Protection Agency under the Environmental Protection Act [415 ILCS 5/1]. The undersigned further agrees to release the Illinois State Police and the Illinois Environmental Protection Agency, its agents and designees under this release, from any and all liability which may be incurred as a result of compliance with this authorization for release of information.

#### **CERTIFICATION STATEMENTS**

I certify under penalty of law that 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))***

  
 Applicant's Signature:  
 M. Slade O'Keefe

Printed Name:

03/20/2025  
 Date:  
 Manager

Title:

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Site Name	Site Address	IEPA BOL #	County	Type of Material	Activity Type	IEPA Log No
Southwind RAS, LLC Bartlett Recycle Facility	1950 Vulcan Blvd Bartlett, IL 60103	314125049	Cook	Shingles	Recycle	BUD09-006-R-1
Southwind RAS, LLC Decatur RAS Facility	680 West El Dorado Decatur, IL 62521	894125010	Macon	Shingles	Recycle	BUD10-007-R-1
Southwind RAS, LLC Peoria RAS Facility	2217 S. Darst Street Peoria, IL 61601	1430000000	Peoria	Shingles	Recycle	BUD10-012-R-1
Southwind RAS, LLC Mundelein RAS Facility	19109 Winchester Mundelein, IL 60060	971155241	Lake	Shingles	Recycle	BUD10-014-M-3
Southwind RAS, LLC Romeoville RAS Facility	South Material Road Romeoville, IL 60446	1970905199	Will	Shingles	Recycle	BUD11-013
Southwind RAS, LLC Lake in the Hills RAS Facility	8813 S Route 31 Lake in the Hills, IL 60156	1110000000	McHenry	Shingles	Recycle	BUD11-003
Southwind RAS, LLC Thornton RAS Facility	183rd and Glenwood/Thornton Rd Thornton, IL 60476	310000000	Cook	Shingles	Recycle	BUD11-013
Southwind RAS, LLC Skokie RAS Facility	3219 Oakton Street Skokie, IL 60076	312888618	Cook	Shingles	Recycle	BUD12-006
Southwind RAS, LLC McCook Recycle Site	5300 Lawndale Ave McCook, IL 60525	311745067	Cook	Shingles	Recycle	BUD13-002
Southwind RAS, LLC Springfield RAS Facility	2100 J David Jones Pkwy Springfield, IL 62707	1671205529	Sangamon	Shingles	Recycle	BUD13-003
Heartland Recycling Center Aurora RAS Facility	213 Mettel Road Aurora, IL 60504	894075963	Kane	Shingles	Recycle	BUD13-014
Quality North Central Recycle Center	1820 North Central Ave Chicago, IL 60639	316305085	Cook	Shingles	Recycle	BUD13-009
Southwind RAS, LLC DeKalb Recycle Center	900 Oak Street DeKalb, IL 60115	370105011	DeKalb	Shingles	Recycle	BUD13-020
Southwind RAS, LLC Sterling Recycle Center	2707 West 4th Street Sterling, IL 61081	1950505155	Whiteside	Shingles	Recycle	BUD13-025
Southwind RAS, LLC Urbana Recycle Center	1000 W Saline Court Urbana, IL 61801	191059085	Champaign	Shingles	Recycle	BUD13-022
Southwind RAS, LLC Bloomington Recycle Center	2148 Tri Lakes Rd Bloomington, IL 61704	1138045001	McLean	Shingles	Recycle	BUD13-021
Southwind RAS, LLC Grand Avenue Recycle Center	4613 W. Grand Ave. Chicago, IL 60639	316195385	Cook	Shingles	Recycle	BUD14-009
Southwind RAS, LLC Sangamo RAS	2100 Moffat (19th/Washington) Springfield, IL 62707	1671209387	Sangamon	Shingles	Recycle	BUD16-003
Southwind RAS, LLC Richton Park RAS Recycling Facility	22100 Central Avenue Richton Park, IL 60471	312555027	Cook	Shingles	Recycle	BUD16-007

Site Name	Site Address	IEPA BOL #	Type of Material	Activity Type	IEPA Log No
Northwind RAS, LLC	4225 Prairie Hill Rd				
South Beloit RAS Facility	South Beloit, IL 61080	2010000000 -- Winnebago County	Shingles	Recycle	BUD10-010-R-1
Northwind RAS, LLC	301 W BR Townline Rd				
Janesville RAS Facility	Janesville, WI 53545	2010305617 --Winnebago County	Shingles	Recycle	BUD11-019
G&E Five, LLC	5728 9th Street				
Rockford 9th Street RAS Facility	Rockford, IL 61109	2010306637 -- Winnebago County	Shingles	Recycle	BUD12-010

Site Name	Site Address	IEPA BOL #	Type of Material	Activity Type	IEPA Log No
Hansen's RAS O'Fallon Recycle Center	1628 Kemmar Court O'Fallon, MO 63366	1194285099 -- St Clair County	Shingles	Recycle	BUD13-011
Hansen's RAS Fairview Heights Recycle Center	9665 Route 161 Fairview Heights, IL	1630525105 -- St Clair County	Shingles	Recycle	BUD14-005



## Southwind RAS I, LLC

BUD25-004

March 31, 2025

Mr. Michael Anderson  
Bureau of Land – Permit Section  
Disposal Alternatives Unit  
Illinois Environmental Protection Agency  
2520 West Iles Avenue  
Springfield, IL 62704  
217.524.8440

Re: Southwind RAS I, LLC – Romeoville, Will County, Romeoville, IL  
Beneficial Use Determination (BUD) Application  
Additional Information Requested

Dear Mr. Anderson:

In response to your request for additional information outlined in our phone call from March 28, 2025, please find enclosed the following:

- Copy of Supply Certification Form
- Copy of Southwind RAS I, LLC – Shingles Training Program
- Executed form 39(i) for the application

Thank you in advance for your assistance with this application submittal. Given the timing and nature of seasonal temperatures and potential effects on the effectiveness of this construction process, an expedited review of this application would be appreciated. Should you have any questions or require any additional information, please contact me at (630) 497-8700.

Sincerely,

**SOUTHWIND RAS I, LLC**

A handwritten signature in black ink.

Josh Quinn  
Vice President – Safety, Environmental Services and Compliance  
Southwind Industries, Inc. (Parent Company of Southwind RAS I, LLC)

Enclosures

**RECEIVED**  
APR 01 2025  
IEPA-BOL  
PERMIT SECTION





# Southwind RAS I, LLC

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ATTACHMENT 1: SUPPLY CERTIFICATION FORM



# Southwind RAS, LLC

## Supplier Training Certificate

*For Shingles Recycling*

I certify that I have received, carefully read, and reviewed the content of and completed the "Asphalt Shingles Recycling Training Guide" as a supplier who is delivering or having delivered asphalt roofing shingles to the Southwind RAS recycling facility. I hereby certify that I will follow the guidelines and requirements as set forth in the Training Program to the best of my ability. I further certify that I am aware that my failure to comply with the laws, rules, policies, and procedures referenced within the Training Program may result in a rejection of the delivery of material to the site.

\_\_\_\_\_  
Printed Name

\_\_\_\_\_  
Title

\_\_\_\_\_  
Company

\_\_\_\_\_  
Phone Number

\_\_\_\_\_  
Fax Number

\_\_\_\_\_  
Address

\_\_\_\_\_  
City

\_\_\_\_\_  
State

\_\_\_\_\_  
Email

Please identify type of supplier:

☐ General contractor

☐ Roofing contractors

☐ Home builders

☐ Home owners

☐ Permitted C&D facility

☐ Other(s) \_\_\_\_\_

## Supply Certification Form

*Post-Consumer Tear-off Asphalt Shingles*

We the undersigned, certify that:

- All Post Consumer (Tear-off) asphalt shingle scrap came from residential building having four or fewer dwelling units;
- These residential buildings are not "regulated facilities" according to state and federal NESHAP 40 CFR Part 61, Subpart M.;
- The roofing waste material delivered consists of asphalt shingles and normal roofing debris only and contains no known hazardous material (e.g., asbestos); and
- We will provide Addresses where shingles are coming from on a Address Tracking sheet format

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

\*\*Please email signed copy to [info@southwindRAS.com](mailto:info@southwindRAS.com) or fax to 630-524-9020 to complete training. You will receive a confirmation within 24 hours of receipt. \*\*

For Southwind RAS Personnel use only:

*I certify I have discussed with the supplier identified herein the Training Program that the supplier is required to review and complete. I further certify the training he or she is receiving allows the supplier to bring material to Southwind RAS, LLC facilities subject to further on-site inspection.*

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Title

\_\_\_\_\_  
Printed Name

\_\_\_\_\_  
Date



# **Southwind RAS I, LLC**

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ATTACHMENT 2: SOUTHWIND RAS I, LLC – SHINGLES TRAINING PROGRAM



# Southwind RAS, LLC

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## **Personnel Training Program**

The purpose of this document is to summarize the personnel training for recycling post-consumer reclaimed asphalt shingles operations for Southwind RAS, LLC, subject to the parameters outlined under a beneficial use determination (BUD) (415 ILCS 5/22.54) along with the Illinois Department of Transportation (IDOT) - Bureau of Materials and Physical Research (BMPR) Policy Memorandum 28-10.3, pertaining to Reclaimed Asphalt Shingle (RAS) Sources.

### Asbestos Hazard Training

Incoming loads of post-consumer asphalt shingles are inspected and accepted or rejected by a trained and certified asbestos inspector. The inspector is certified in the recognition of asbestos containing material (ACM) as well as potential ACM and the various health effects of asbestos. The inspector's work responsibilities are limited to contact with shingles; they do not disturb ACM or potential ACM. This training also certifies the inspector as a competent person, as outlined in 29 CFR 1910.1001 (OSHA Asbestos Standard for General Industry), capable of identifying and evaluating asbestos hazards and selecting the appropriate control for any identified hazards. It is important to note that the inspector does not engage in abatement or removal of ACM or potential ACM. Inspectors are certified to inspect for asbestos and to collect samples to determine the presence of ACM or potential ACM.

The inspector's responsibilities include: 1) inspection of all inbound materials to ensure non-conforming material, including ACM and potential ACM, are not accepted at the site; and 2) collection of routine samples, in accordance with the frequencies identified in the Standard Best Management Practices, to determine the presence of ACM.

In addition to Asbestos Hazard Training, the inspector is also trained in accordance with the facility's Quality Control Plan and Standard Best Management Practices. This training is given by personnel who have been certified as an Asbestos Building Inspector.

### Asbestos Building Inspector Training

Southwind RAS, LLC has operations managers, engineers, and compliance personnel certified as Asbestos Building Inspectors to handle responsibilities pertaining to sample collection and implementing controls for sample results that identify the presence of ACM (after following standard protocols identified in the Quality Control Plan and Standard Best Management Practices). Asbestos Building Inspectors are also certified to inspect for asbestos and to collect samples to determine the presence of ACM or potential ACM.

Personnel trained as building inspectors are responsible for ensuring sampling protocols are met and completing the appropriate response in a situation where ACM has been identified in a sample. In the event that ACM is identified in a sample, trained personnel will collect additional samples, identify and delineate all potential ACM, and coordinate disposal of ACM and potential ACM at a licensed and permitted landfill.

# **Recycled Asphalt Shingles (RAS) Recycling Operation**

**Training Guide for:  
On-site Inspectors and Sorting Personnel**

**PROVIDED BY:**

**Southwind RAS, LLC**  
**ROOFS TO ROADS**



**SOUTHWIND RAS, LLC**



Before working at a RAS operation, **you must**:

- Complete internal training program

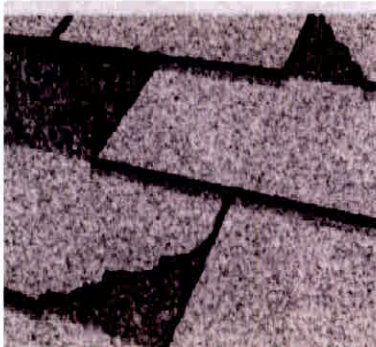
- Complete Certified Asbestos Inspector training





## ACCEPTABLE MATERIALS

- ✓ Asphalt Shingles
- ✓ Felt Attached to Shingles
- ✓ Nails Mixed with Shingles



## UNACCEPTABLE MATERIALS

- Cedar Shingles
- Built-up Asphalt Roofing & Flat Roofing Shingles
- Rolls / Sheets of Felt Paper
- Asbestos / Any Material Containing Asbestos
- Household Trash



SOUTHWIND RAS, LLC





**CLEAN Loads**





# Incoming loads may not contain the following:

- Wood (Plywood, Pallets, Etc.)
- Metal (Gutters, Flashing, Etc.)
- Plastic Wrap, Paper, & Felt Paper

These materials must be removed from shingles stockpile area!

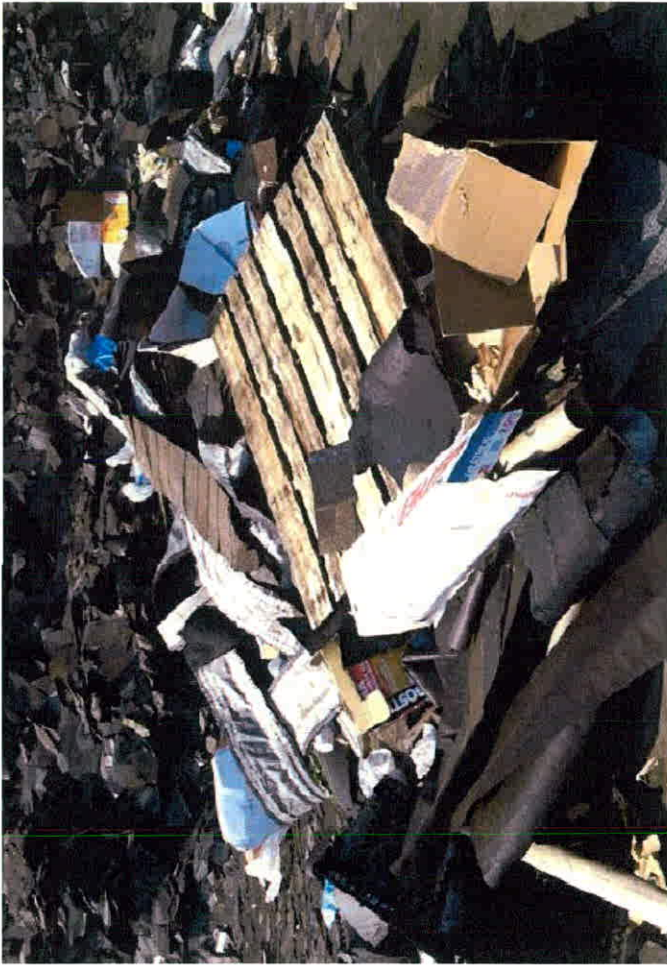


SOUTHWIND RAS, LLC



# REJECTED Loads

R 000079



# *INBOUND LOAD REQUIREMENTS*

- Trained personnel visually inspects each load of inbound shingles.
- All non-conforming material must be removed from the load prior to commingling with stockpile.
- If the load consists primarily of non-shingle debris (plywood, plastic, etc.), it must be rejected.
  - A load rejection form must be completed for each load that is rejected. Be sure to obtain a photo of the rejected load.
- Address tracking sheet must be completed for each load of inbound shingles.
- Supply certification forms must be signed for each customer that brings material in.







# Southwind RAS I, LLC

## Supply Training Manual

*For Shingles Recycling*

I certify that I have received, carefully read and reviewed the content of, and completed the "*Asphalt Shingles Recycling Training Guide*" as a supplier who is delivering or having delivered asphalt roofing shingles to the Southwind RAS I, LLC recycling facility. I hereby certify that I will follow the guidelines and requirements as set forth in the Training Program to the best of my ability. I further certify that I am aware that my failure to comply with the laws, rules, policies, and procedures referenced within the Training Program may result in a rejection of the delivery of material to the site.

\_\_\_\_\_  
Printed Name

\_\_\_\_\_  
Title

\_\_\_\_\_  
Company

\_\_\_\_\_  
Phone Number

\_\_\_\_\_  
Fax Number

\_\_\_\_\_  
Address

\_\_\_\_\_  
City

\_\_\_\_\_  
State

\_\_\_\_\_  
Email

Please identify type of supplier:

☐ General contractor

☐ Roofing contractors

☐ Home builders

☐ Home owners

☐ Permitted C&D facility

☐ Other(s) \_\_\_\_\_

## Supply Certification Form

*Post-Consumer Tear-off Asphalt Shingles*

We the undersigned, certify that:

Initial

1. \_\_\_ All Post Consumer (Tear-off) asphalt shingle scrap came from residential building having four or fewer dwelling units;

2. \_\_\_ these residential buildings are not "regulated facilities" according to state and federal NESHAP 40 CFR Part 61, Subpart M;

3. \_\_\_ the roofing waste material delivered consists of asphalt shingles and normal roofing debris only and contains no known hazardous material (e.g., asbestos); and

4. \_\_\_ We will provide Addresses where shingles are coming from on a Address Tracking sheet format

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

**\*\*Please email signed copy to [info@southwindRAS.com](mailto:info@southwindRAS.com) or fax to 630-524-9155 to complete training. You will receive a confirmation within 24 hours of receipt. \*\***

— For Southwind RAS I, LLC Personnel use only:

*I certify I have discussed with the supplier identified herein the "Supply Training Manual" that the supplier is required to review and complete. I further certify that the training he or she is receiving allows the supplier to bring material to Southwind RAS I, LLC facilities subject to further on-site inspection.*

\_\_\_\_\_  
Printed Name

\_\_\_\_\_  
Title

\_\_\_\_\_  
Company

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

***FOR MORE INFORMATION:***

Please Contact:

**Southwind RAS, LLC - SALES DEPARTMENT**

Jenny Kinter: [jennyk@grp7.com](mailto:jennyk@grp7.com)

(630) 380-4171

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**Southwind RAS, LLC – ENVIRONMENTAL**

Nate Caliendo: [NathanC@grp7.com](mailto:NathanC@grp7.com)

(224) 242-4366



SOUTHWIND RAS, LLC



# Southwind RAS I, LLC

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ATTACHMENT 3: FORM 39(i) FOR SOUTHWIND RAS I, LLC





# Illinois Environmental Protection Agency

1021 North Grand Avenue East • P.O. Box 19276 • Springfield • Illinois • 62794-9276 • (217) 782-3397

## 39(i) Certification for Operating a Waste Management Facility

Pursuant to 415 ILCS 5/39(i), prior to issuing any RCRA permit, or any permit for a waste storage site, sanitary landfill, waste disposal site, waste transfer station, waste treatment facility, waste incinerator, clean construction or demolition debris fill operation, or used tire storage site, the Illinois EPA must conduct an evaluation of the prospective owner's or operator's prior experience in waste management operations, clean construction or demolition debris fill operations, and tire storage site management. As part of that evaluation please complete and submit this form with your permit application.

This form may be completed online and saved locally before printing, signing and submitting it to the Illinois EPA at the address below. If the form is completed manually, please type or print clearly.

Illinois Environmental Protection Agency  
Division of Land Pollution Control - #33  
39(i) Certification  
1021 North Grand Avenue East  
P.O. Box 19276  
Springfield, IL 62794-9276

### I. Applicant Information

Site Name Romeoville RAS Recycle Center

IEPA BOL No.: 1970905199

Site Address 5 S. Material Road

City: Romeoville

State: IL

Zip Code: 60446

Permit Numbers (if applicable): BUD20-016

#### Owner

Owner Name: Southwind RAS I, LLC

Street Address: 2250 Southwind Blvd

City: Bartlett

State: IL

Zip: 60103

#### Operator

Operator Name: Southwind RAS I, LLC

Street Address: 2250 Southwind Blvd

City: Bartlett

State: IL

Zip: 60103

Is this 39(i) certification for the owner or the operator?

☐ Owner

☐ Operator

☒ Owner and operator are the same entity

### II. Officers and Employees with Site Responsibility

Unless the owner and operator are the same entity, a separate 39(i) form must be submitted for both the owner and operator. Persons operating under the authority of the owner should be listed on the owner's 39(i) form and persons operating under authority of the operator should be listed on the operator's 39(i) form.

A. Officers: List the name and title of all officers of the owner or operator that will have personal involvement or active participation in the operation or management of the site or facility for which the application is submitted.

Name	Title
Josh Quinn	Manager, Southwind RAS I, LLC

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B. Employees: List the name and title of each employee of the owner or operator that will have personal involvement or active participation in the overall operation or management of the site or facility for which the application is submitted (e.g. site managers, site engineers, and other persons who direct or control the overall day-to-day management of the operation, but not persons whose duties are exclusively limited to equipment operation, labor, or similar non-managerial functions).

Name	Title
Josh Quinn	Manager, Southwind RAS I, LLC

### III. Owner, Operator, Officer, and Employee Information

#### A. Prior Conduct Identification

The applicant must answer each of the following questions for every owner or operator, and for any officer or employee identified under Section II. If the answer to any of the following questions is affirmative, the applicant must complete an Attachment A for each person for whom the answer is affirmative and include a copy of each final administrative or judicial determination that required an affirmative response. If the information for each owner, operator, officer, and employee has not changed since the applicant's last submission of a 39(i) certification, the applicant can skip to Section III(C), below.

- 1) Has there been a finding that any person named in Section II violated federal, State, or local laws, regulations, standards, or ordinances in the operation of one or more waste management facilities or sites, clean construction or demolition debris fill operation facilities or sites, or tire storage sites? ☐ Yes  
☒ No
- 2) Has any person named in Section II ever been convicted in this or another State of any crime which is a felony under the laws of this State, or convicted of a felony in a federal court; or convicted in this or another state or federal court of any of the following crimes: forgery, official misconduct, bribery, perjury, or knowingly submitting false information under any environmental law, regulation, or permit term or condition? ☐ Yes  
☒ No
- 3) Has there been a finding against any person named in Section II of gross carelessness or incompetence in handling, storing, processing, transporting or disposing of waste, clean construction or demolition debris, or used or waste tires, or a finding of gross carelessness or incompetence in using clean construction or demolition debris as fill? ☐ Yes  
☒ No

#### B. Pending Proceedings

The applicant must answer each of the following questions for every owner or operator, and for any officer or employee identified in Section II. If the answer to any of the following questions is affirmative, the applicant must complete an Attachment A for each person for whom the answer is affirmative and provide information identified in Attachment A regarding the pending proceeding.

1. Is there any proceeding currently pending against any person named in Section II that could result in a conviction or finding described in subsection A, above? ☐ Yes  
☒ No
2. Is there any proceeding currently pending against any person named in Section II that could result in the reversal of a conviction or finding described in subsection A, above? ☐ Yes  
☒ No

#### C. Prior Application Information

If (i) the applicant has previously submitted the Attachments required pursuant to subsections A and B above and (ii) the Attachments previously submitted are still complete, true, and correct, then the applicant does not need to include Attachments with this submission if the following box is checked:

☐ By checking this box, I affirm that the Attachments previously submitted are still complete, true, and correct and wish to incorporate them into this Certification.

If the above box is checked, identify the application that contains the previously submitted Attachments that are complete, true, and correct.

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PERMIT SECTION



**Authorization for Release of Information**

This Certification must be signed by an officer of the applicant.

The undersigned authorizes any representative of the Illinois Environmental Protection Agency bearing this release to obtain any information from the Illinois State Police pertaining to the criminal records of the applicant and hereby directs the Illinois State Police to release such information upon request of the bearer. The undersigned authorizes a review of and full disclosure of all records, or any part thereof, concerning the applicant's criminal records by and to a duly authorized agent of the Illinois Environmental Protection Agency, whether the records are of public, private, or confidential nature. The intent of this authorization is to give consent for full and complete disclosure of the applicant's criminal records.

The undersigned fully understands that any information which is developed directly or indirectly, in whole or in part, as a result of this authorization will be considered in determining whether a permit shall be issued by the Illinois Environmental Protection Agency under the Environmental Protection Act [415 ILCS 5]. The undersigned further agrees to release the Illinois State Police and the Illinois Environmental Protection Agency, its agents and designees under this release, from any and all liability which may be incurred as a result of compliance with this authorization for release of information.

**Certification Statements**

I certify under penalty of law that the information submitted, including information on any Attachments submitted as part of or incorporated into this Certification, 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))***



Signature of Applicant Officer

Josh Quinn

Printed Name

3/31/2025

Date

Manager, Southwind RAS I, LLC

Title

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APR 01 2025  
IEPA-BOL  
PERMIT SECTION

**Attachment A (1 of 1)**

This Attachment must be completed for each owner or operator, and for each officer or employee identified in Section II, for whom one or more affirmative responses were included in Section III.

Name: \_\_\_\_\_ Title: \_\_\_\_\_

Status: ☐ Owner ☐ Operator ☐ Officer ☐ Employee (check all that apply)

**A. Prior Findings or Convictions**

1. Has there been a finding that the person named above violated federal, State, or local laws, regulations, standards, or ordinances in the operation of one or more waste management facilities or sites, clean construction or demolition debris fill operation facilities or sites, or tire storage sites? ☐ Yes  
☐ No
2. Has the person named above ever been convicted in this or another State of any crime which is a felony under the laws of this State, or convicted of a felony in a federal court; or convicted in this or another state or federal court of any of the following crimes: forgery, official misconduct, bribery, perjury, or knowingly submitting false information under any environmental law, regulation, or permit term or condition? ☐ Yes  
☐ No
3. Has there been a finding against the person named above of gross carelessness or incompetence in handling, storing, processing, transporting or disposing of waste, clean construction or demolition debris, or used or waste tires, or a finding of gross carelessness or incompetence in using clean construction or demolition debris as fill? ☐ Yes  
☐ No

**If the answer to any of the above questions is Yes, attach a copy of each final administrative or judicial determination that required an affirmative response.**

**B. Pending Proceedings**

Is there any proceeding currently pending that could result in one of the following:

1. A conviction or finding described in subsection A, above? ☐ Yes  
☐ No
2. The reversal of a conviction or finding described in subsection A, above? ☐ Yes  
☐ No

If the answer to any of the above questions is Yes, please provide information about the pending proceeding, including the parties involved, the adjudicating body, the docket number, the nature of the proceeding, and the status. The box below will expand as needed. Attach additional sheets if necessary.

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## Southwind RAS I, LLC

April 8, 2025

Mr. Michael Anderson  
Bureau of Land – Permit Section  
Disposal Alternatives Unit  
Illinois Environmental Protection Agency  
2520 West Iles Avenue  
Springfield, IL 62704  
217.524.8440

**RECEIVED**

APR 09 2025

IEPA-BOL  
PERMIT SECTION

Re: Southwind RAS I, LLC – Romeoville, Will County, Romeoville, IL  
Beneficial Use Determination (BUD) Application  
Additional Information Requested

Dear Mr. Anderson:

In response to your request for additional information outlined in our phone call from March 28, 2025, please find enclosed the following:

- Revised and Executed form 39(i) for the application to include Slade O'Keefe

Thank you in advance for your assistance with this application submittal. Given the timing and nature of seasonal temperatures and potential effects on the effectiveness of this construction process, an expedited review of this application would be appreciated. Should you have any questions or require any additional information, please contact me at (630) 497-8700.

Sincerely,

**SOUTHWIND RAS I, LLC**

Josh Quinn  
Vice President – Safety, Environmental Services and Compliance  
Southwind Industries, Inc. (Parent Company of Southwind RAS I, LLC)

Enclosures





# Illinois Environmental Protection Agency

1021 North Grand Avenue East • P.O. Box 19276 • Springfield • Illinois • 62794-9276 • (217) 782-3397

## 39(i) Certification for Operating a Waste Management Facility

Pursuant to 415 ILCS 5/39(i), prior to issuing any RCRA permit, or any permit for a waste storage site, sanitary landfill, waste disposal site, waste transfer station, waste treatment facility, waste incinerator, clean construction or demolition debris fill operation, or used tire storage site, the Illinois EPA must conduct an evaluation of the prospective owner's or operator's prior experience in waste management operations, clean construction or demolition debris fill operations, and tire storage site management. As part of that evaluation please complete and submit this form with your permit application.

This form may be completed online and saved locally before printing, signing and submitting it to the Illinois EPA at the address below. If the form is completed manually, please type or print clearly.

Illinois Environmental Protection Agency  
Division of Land Pollution Control - #33  
39(i) Certification  
1021 North Grand Avenue East  
P.O. Box 19276  
Springfield, IL 62794-9276

RECEIVED  
APR 09 2025  
IEPA-BOL  
PERMIT SECTION

### I. Applicant Information

Site Name Romeoville RAS Recycle Center

IEPA BOL No.: 1970905199

Site Address 5 S. Material Road

City: Romeoville

State: IL

Zip Code: 60446

Permit Numbers (if applicable): BUD20-016

#### Owner

Owner Name: Southwind RAS I, LLC

Street Address: 2250 Southwind Blvd

City: Bartlett

State: IL

Zip: 60103

#### Operator

Operator Name: Southwind RAS I, LLC

Street Address: 2250 Southwind Blvd

City: Bartlett

State: IL

Zip: 60103

Is this 39(i) certification for the owner or the operator?

☐ Owner

☐ Operator

☒ Owner and operator are the same entity

### II. Officers and Employees with Site Responsibility

Unless the owner and operator are the same entity, a separate 39(i) form must be submitted for both the owner and operator. Persons operating under the authority of the owner should be listed on the owner's 39(i) form and persons operating under authority of the operator should be listed on the operator's 39(i) form.

A. Officers: List the name and title of all officers of the owner or operator that will have personal involvement or active participation in the operation or management of the site or facility for which the application is submitted.

Name	Title
Josh Quinn	Manager, Southwind RAS I, LLC



B. Employees: List the name and title of each employee of the owner or operator that will have personal involvement or active participation in the overall operation or management of the site or facility for which the application is submitted (e.g. site managers, site engineers, and other persons who direct or control the overall day-to-day management of the operation, but not persons whose duties are exclusively limited to equipment operation, labor, or similar non-managerial functions).

Name	Title
Slade O'Keefe	Manager, Southwind RAS I, LLC

### III. Owner, Operator, Officer, and Employee Information

#### A. Prior Conduct Identification

The applicant must answer each of the following questions for every owner or operator, and for any officer or employee identified under Section II. If the answer to any of the following questions is affirmative, the applicant must complete an Attachment A for each person for whom the answer is affirmative and include a copy of each final administrative or judicial determination that required an affirmative response. If the information for each owner, operator, officer, and employee has not changed since the applicant's last submission of a 39(i) certification, the applicant can skip to Section III(C), below.

- 1) Has there been a finding that any person named in Section II violated federal, State, or local laws, regulations, standards, or ordinances in the operation of one or more waste management facilities or sites, clean construction or demolition debris fill operation facilities or sites, or tire storage sites? ☐ Yes  
☒ No
- 2) Has any person named in Section II ever been convicted in this or another State of any crime which is a felony under the laws of this State, or convicted of a felony in a federal court; or convicted in this or another state or federal court of any of the following crimes: forgery, official misconduct, bribery, perjury, or knowingly submitting false information under any environmental law, regulation, or permit term or condition? ☐ Yes  
☒ No
- 3) Has there been a finding against any person named in Section II of gross carelessness or incompetence in handling, storing, processing, transporting or disposing of waste, clean construction or demolition debris, or used or waste tires, or a finding of gross carelessness or incompetence in using clean construction or demolition debris as fill? ☐ Yes  
☒ No

#### B. Pending Proceedings

The applicant must answer each of the following questions for every owner or operator, and for any officer or employee identified in Section II. If the answer to any of the following questions is affirmative, the applicant must complete an Attachment A for each person for whom the answer is affirmative and provide information identified in Attachment A regarding the pending proceeding.

1. Is there any proceeding currently pending against any person named in Section II that could result in a conviction or finding described in subsection A, above? ☐ Yes  
☒ No
2. Is there any proceeding currently pending against any person named in Section II that could result in the reversal of a conviction or finding described in subsection A, above? ☐ Yes  
☒ No

#### C. Prior Application Information

If (i) the applicant has previously submitted the Attachments required pursuant to subsections A and B above and (ii) the Attachments previously submitted are still complete, true, and correct, then the applicant does not need to include Attachments with this submission if the following box is checked:

☐ By checking this box, I affirm that the Attachments previously submitted are still complete, true, and correct and wish to incorporate them into this Certification.

If the above box is checked, identify the application that contains the previously submitted Attachments that are complete, true, and correct.

**RECEIVED**

APR 09 2025

IEPA-BOL  
PERMIT SECTION



**Authorization for Release of Information**

This Certification must be signed by an officer of the applicant.

The undersigned authorizes any representative of the Illinois Environmental Protection Agency bearing this release to obtain any information from the Illinois State Police pertaining to the criminal records of the applicant and hereby directs the Illinois State Police to release such information upon request of the bearer. The undersigned authorizes a review of and full disclosure of all records, or any part thereof, concerning the applicant's criminal records by and to a duly authorized agent of the Illinois Environmental Protection Agency, whether the records are of public, private, or confidential nature. The intent of this authorization is to give consent for full and complete disclosure of the applicant's criminal records.

The undersigned fully understands that any information which is developed directly or indirectly, in whole or in part, as a result of this authorization will be considered in determining whether a permit shall be issued by the Illinois Environmental Protection Agency under the Environmental Protection Act [415 ILCS 5]. The undersigned further agrees to release the Illinois State Police and the Illinois Environmental Protection Agency, its agents and designees under this release, from any and all liability which may be incurred as a result of compliance with this authorization for release of information.

**Certification Statements**

I certify under penalty of law that the information submitted, including information on any Attachments submitted as part of or incorporated into this Certification, 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))***



Signature of Applicant Officer

Josh Quinn

Printed Name



Date

Manager, Southwind RAS I, LLC

Title

**RECEIVED**

APR 09 2025

**IEPA-BOL  
PERMIT SECTION**

**Attachment A (1 of 1)**

This Attachment must be completed for each owner or operator, and for each officer or employee identified in Section II, for whom one or more affirmative responses were included in Section III.

Name: \_\_\_\_\_ Title: \_\_\_\_\_

Status: ☐ Owner ☐ Operator ☐ Officer ☐ Employee (check all that apply)

**A. Prior Findings or Convictions**

1. Has there been a finding that the person named above violated federal, State, or local laws, regulations, standards, or ordinances in the operation of one or more waste management facilities or sites, clean construction or demolition debris fill operation facilities or sites, or tire storage sites? ☐ Yes  
☐ No
2. Has the person named above ever been convicted in this or another State of any crime which is a felony under the laws of this State, or convicted of a felony in a federal court; or convicted in this or another state or federal court of any of the following crimes: forgery, official misconduct, bribery, perjury, or knowingly submitting false information under any environmental law, regulation, or permit term or condition? ☐ Yes  
☐ No
3. Has there been a finding against the person named above of gross carelessness or incompetence in handling, storing, processing, transporting or disposing of waste, clean construction or demolition debris, or used or waste tires, or a finding of gross carelessness or incompetence in using clean construction or demolition debris as fill? ☐ Yes  
☐ No

**If the answer to any of the above questions is Yes, attach a copy of each final administrative or judicial determination that required an affirmative response.**

**B. Pending Proceedings**

Is there any proceeding currently pending that could result in one of the following:

1. A conviction or finding described in subsection A, above? ☐ Yes  
☐ No
2. The reversal of a conviction or finding described in subsection A, above? ☐ Yes  
☐ No

If the answer to any of the above questions is Yes, please provide information about the pending proceeding, including the parties involved, the adjudicating body, the docket number, the nature of the proceeding, and the status. The box below will expand as needed. Attach additional sheets if necessary.

**RECEIVED**  
APR 09 2025  
IEPA-BOL  
PERMIT SECTION



SOUTHWIND RAS, LLC

## PURCHASE ORDER

PO #

062025-02

## Southwind RAS, LLC

Billing Address:

2250 Southwind Blvd.  
Bartlett, IL 60103  
Phone: (630) 497-8700

DATE

6/10/2025

PROJECT #

PO #

062025-02

PROJECT NAME: Romeoville Lot Development - Phase II-A

<b>SELLER:</b>	<b>SOUTHWIND RAS, LLC - Romeoville</b>
<b>ATTN:</b>	Dan Johnson
<b>ADDRESS:</b>	5 S. Material Road Romeoville, IL 60446
<b>PHONE:</b>	630.233.5700
<b>EMAIL:</b>	<a href="mailto:danj@grp7.com">danj@grp7.com</a>

<b>PURCHASER:</b>	<b>Reliable Asphalt Corporation</b>
<b>ATTN:</b>	Paul Etter
<b>ADDRESS:</b>	Chicago, IL
<b>PHONE:</b>	
<b>EMAIL:</b>	

Qty:	Units:	Description:	GL#	Unit Price:	TOTAL:
36,930	TONS	Construction Aggregate / RAS Blend		\$ 1.00	\$ 36,930.00

Subtotal	\$ 36,930.00
Taxes (State)	\$ -
<b>TOTAL</b>	<b>\$ 36,930.00</b>

## AGREED &amp; ACCEPTED:

RELIABLE ASPHALT CORPORATION

SOUTHWIND RAS, LLC - Romeoville

*Paul Etter*

6/10/2025

BY:

DATE

*Dan Johnson*

6/10/2025

BY:

DATE

1. Please send two (2) copies of your invoice.
2. Enter this order in accordance with the prices, terms, delivery method, and specifications listed above.
3. Please notify us immediately if you are unable to ship as specified.
4. Send all correspondence to: SEE ABOVE
5. All quantities are approximate and billing shall be based on actual quantities.
6. Certificate of Insurance Required: YES ☒ NO ☐

## Notes:

Anticipated delivery date of July 2025



**SOUTHWIND RAS, LLC**  
**STANDARD TERMS AND CONDITIONS OF PURCHASE ORDER**

1. Unless otherwise specified in the body of this Purchase Order, all material supplied must be in full compliance with the plans and specifications of the Owner's project to which this purchase order relates.
2. Seller must comply with all applicable Federal, State and local laws and regulations with respect to this purchase order.
3. All product to be new, and all work is to be done in a workman like manner, according to standard practices. Any deviation or alteration from the above specifications will require approval of all parties.
4. Warranty: Any and all are to be included at the time of delivery.
5. Prices as shown on the face of this purchase order are firm for the duration of the project. No escalation in cost is to be allowed unless specifically allowed in writing by Purchaser as an addendum to this purchase order. If the purchase order is written on a unit price basis, such unit prices shall hold firm despite variances in actual quantities ordered from anticipated quantities.
6. All purchases are Free On Board delivered to the jobsite. Risk of loss shall be born by seller until purchaser accepts delivery. Acceptance is contingent, and concealed damage or defect is the responsibility of the Seller. All prices include shipping and handling costs - no separate freight charges will be allowed unless directed in writing by purchaser. If the material requires on-site setup or other services, such costs are included in the purchase price.
7. Payment will be made within 45 days of receipt of invoice and proof of delivery as may be required, unless the material is of such a special nature as to require the consent of the owner or owner's representative. In such case payment will be made 60 days following such acceptance. Purchaser's normal payment cycles are the 10th and 25th of each month. Payment will be made in the closest period corresponding to 45 days after such receipt or acceptance. Seller will supply Purchaser with appropriate releases or waivers of lien as required by Purchaser in pursuit of payment. Such releases or waivers will be supplied whether or not corresponding payment has been made by Purchaser. Such releases or waivers will be supplied to Purchases within 3 business days of such request.
8. Notwithstanding any other documents related to this purchase order, seller is deemed to have expertise in its products and familiarity with Purchaser's requirements, including the project plans and specifications. As such, seller warrants that material to be supplied is of commercial quality and fit for Purchaser's purpose. The Seller agrees to indemnify, defend and hold harmless buyer from any fines penalties or costs that may be incurred for lack of compliance with this warranty.
9. Time is of the essence in this Purchase Order. Seller is deemed to be aware of all schedule related issues related to the plans and specifications for the project, specifically liquidated damages that Purchaser may incur. As such, Seller agrees to pay its proportionate share of any such damages that may be assessed against Purchaser, in Purchaser 's determination of the degree to which any delays caused by seller contributed to such damages.
10. All disputes are governed by the laws of the state in which the materials or services are delivered or rendered, unless otherwise stated by Purchaser. At the Purchaser's discretion, all disputes may be subject to mandatory mediation.
11. For any service related order, Seller must include Purchaser as additional insured on Certificate of Insurance and provide a copy at the time of execution of this order.





SOUTHWIND RAS, LLC

## PURCHASE ORDER

PO #

062025-01

## Southwind RAS, LLC

## Billing Address:

2250 Southwind Blvd.  
Bartlett, IL 60103  
Phone: (630) 497-8700

DATE	PROJECT #	PO #
6/10/2025		062025-01

PROJECT NAME: Romeoville Lot Development - Phase I BY

<b>SELLER:</b>	SOUTHWIND RAS, LLC - Romeoville
<b>ATTN:</b>	Dan Johnson
<b>ADDRESS:</b>	5 S. Material Road Romeoville, IL 60446
<b>PHONE:</b>	630.233.5700
<b>EMAIL:</b>	danj@grp7.com

<b>PURCHASER:</b>	Reliable Asphalt Corporation
<b>ATTN:</b>	Paul Etter
<b>ADDRESS:</b>	Chicago, IL
<b>PHONE:</b>	
<b>EMAIL:</b>	

Qty:	Units:	Description:	GL#	Unit Price:	TOTAL:
7,000	TONS	Construction Aggregate / RAS Blend		\$ 1.00	\$ 7,000.00

Subtotal	\$ 7,000.00
Taxes (State)	\$ -
<b>TOTAL</b>	<b>\$ 7,000.00</b>

## AGREED &amp; ACCEPTED:

RELIABLE ASPHALT CORPORATION

SOUTHWIND RAS, LLC - Romeoville

6/10/2025

BY:

DATE

6/10/2025

BY:

DATE

1. Please send two (2) copies of your invoice.
2. Enter this order in accordance with the prices, terms, delivery method, and specifications listed above.
3. Please notify us immediately if you are unable to ship as specified.
4. Send all correspondence to: SEE ABOVE
5. All quantities are approximate and billing shall be based on actual quantities.
6. Certificate of Insurance Required: YES ☒ NO ☐

## Notes:

Anticipated delivery date of July 2025

**SOUTHWIND RAS, LLC**  
**STANDARD TERMS AND CONDITIONS OF PURCHASE ORDER**

1. Unless otherwise specified in the body of this Purchase Order, all material supplied must be in full compliance with the plans and specifications of the Owner's project to which this purchase order relates.
2. Seller must comply with all applicable Federal, State and local laws and regulations with respect to this purchase order.
3. All product to be new, and all work is to be done in a workman like manner, according to standard practices. Any deviation or alteration from the above specifications will require approval of all parties.
4. Warranty: Any and all are to be included at the time of delivery.
5. Prices as shown on the face of this purchase order are firm for the duration of the project. No escalation in cost is to be allowed unless specifically allowed in writing by Purchaser as an addendum to this purchase order. If the purchase order is written on a unit price basis, such unit prices shall hold firm despite variances in actual quantities ordered from anticipated quantities.
6. All purchases are Free On Board delivered to the jobsite. Risk of loss shall be born by seller until purchaser accepts delivery. Acceptance is contingent, and concealed damage or defect is the responsibility of the Seller. All prices include shipping and handling costs - no separate freight charges will be allowed unless directed in writing by purchaser. If the material requires on-site setup or other services, such costs are included in the purchase price.
7. Payment will be made within 45 days of receipt of invoice and proof of delivery as may be required, unless the material is of such a special nature as to require the consent of the owner or owner's representative. In such case payment will be made 60 days following such acceptance. Purchaser's normal payment cycles are the 10th and 25th of each month. Payment will be made in the closest period corresponding to 45 days after such receipt or acceptance. Seller will supply Purchaser with appropriate releases or waivers of lien as required by Purchaser in pursuit of payment. Such releases or waivers will be supplied whether or not corresponding payment has been made by Purchaser. Such releases or waivers will be supplied to Purchases within 3 business days of such request.
8. Notwithstanding any other documents related to this purchase order, seller is deemed to have expertise in its products and familiarity with Purchaser's requirements, including the project plans and specifications. As such, seller warrants that material to be supplied is of commercial quality and fit for Purchaser's purpose. The Seller agrees to indemnify, defend and hold harmless buyer from any fines penalties or costs that may be incurred for lack of compliance with this warranty.
9. Time is of the essence in this Purchase Order. Seller is deemed to be aware of all schedule related issues related to the plans and specifications for the project, specifically liquidated damages that Purchaser may incur. As such, Seller agrees to pay its proportionate share of any such damages that may be assessed against Purchaser, in Purchaser 's determination of the degree to which any delays caused by seller contributed to such damages.
10. All disputes are governed by the laws of the state in which the materials or services are delivered or rendered, unless otherwise stated by Purchaser. At the Purchaser's discretion, all disputes may be subject to mandatory mediation.
11. For any service related order, Seller must include Purchaser as additional insured on Certificate of Insurance and provide a copy at the time of execution of this order.

**Anderson, Michael**

---

**From:** DoNotReply.EJRequest@illinois.gov  
**Sent:** Thursday, March 27, 2025 9:08 AM  
**To:** Mara.McGinnis@illinois.gov; Frost, Brad; Pressnall, Chris; Herr, Alane; Lopez, Luis A.; Lopez-Santos, Paulina; Anderson, Michael  
**Subject:** Outreach Status Change for Southwind RAS LLC | 0894125010 | BUD25-004 | Land  
**Categories:** Environmental Justice

The EJ source (Southwind RAS LLC) has moved forward in the outreach process on 03/27/2025.

The status has changed from \*Review Pending\* to \*Complete - No Outreach\*.

**Anderson, Michael**

---

**From:** Marr, Linda  
**Sent:** Wednesday, April 9, 2025 8:23 AM  
**To:** Anderson, Michael  
**Subject:** FW: CROPA - Southwind RAS; Log #O25-011

PWS comments

Linda Marr  
Bureau of Land, Permit Section  
2520 W. Iles Avenue  
P.O. Box 19276  
Springfield, IL 62794-9276  
217/524-3305  
Linda.Marr@illinois.gov

-----Original Message-----

**From:** Selling, Jason <Jason.Selling@illinois.gov>  
**Sent:** Thursday, April 3, 2025 9:48 AM  
**To:** Marr, Linda <Linda.Marr@Illinois.gov>  
**Subject:** RE: CROPA - Southwind RAS; Log #O25-011

Linda,

Bureau of Water Division of Public Water Supplies has no comment on this project.

Jason Selling  
Jason.Selling@illinois.gov  
Division of Public Water Supplies  
Permit Section

-----Original Message-----

**From:** Marr, Linda <Linda.Marr@Illinois.gov>  
**Sent:** Wednesday, March 26, 2025 1:29 PM  
**To:** Marr, Bill <Bill.Marr@illinois.gov>; Rompot, Derek <Derek.Rompot@Illinois.gov>; Selling, Jason <Jason.Selling@illinois.gov>  
**Cc:** Lazar, Amy M. <Amy.Lazar@Illinois.gov>; Walton, Marlisha M. <Marlisha.Walton@Illinois.gov>  
**Subject:** CROPA - Southwind RAS; Log #O25-011

Please provide comments by 4/16/25. Thank you

NOTE: The log number is incorrect on the actual form. The correct number is listed in the subject line.

Linda Marr  
Bureau of Land, Permit Section  
2520 W. Iles Avenue  
P.O. Box 19276



Springfield, IL 62794-9276  
217/524-3305  
Linda.Marr@illinois.gov

-----Original Message-----

From: P532ZQV624275@illinois.gov <P532ZQV624275@illinois.gov>  
Sent: Wednesday, March 26, 2025 1:08 PM  
To: Marr, Linda <Linda.Marr@Illinois.gov>  
Subject: CROPA - Southwind RAS; Log #O25-011

Please open the attached document. It was sent to you using a Xerox multifunction printer.

Attachment File Type: pdf, Multi-Page

Multifunction Printer Location: Bureau of Land Multifunction Printer Name: P532ZQV624275

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**Anderson, Michael**

---

**From:** Marr, Linda  
**Sent:** Tuesday, April 29, 2025 10:48 AM  
**To:** Anderson, Michael  
**Subject:** FW: Cropa Response Southwind RAS Log #025-011  
**Attachments:** Scanned from a Xerox Multifunction Printer.pdf

**Categories:** CROPA

Comments from BOW attached.

Linda Marr  
Bureau of Land, Permit Section  
2520 W. Iles Avenue  
P.O. Box 19276  
Springfield, IL 62794-9276  
217/524-3305  
Linda.Marr@illinois.gov

-----Original Message-----

**From:** Rompot, Derek <Derek.Rompot@Illinois.gov>  
**Sent:** Tuesday, April 29, 2025 10:42 AM  
**To:** Anderson, Michael <Michael.A.Anderson@Illinois.gov>; Marr, Linda <Linda.Marr@Illinois.gov>  
**Subject:** Cropa Response Southwind RAS Log #025-011

-----Original Message-----

**From:** P532ZQV625416@illinois.gov <P532ZQV625416@illinois.gov>  
**Sent:** Tuesday, April 29, 2025 10:37 AM  
**To:** Rompot, Derek <Derek.Rompot@Illinois.gov>  
**Subject:** Scanned from a Xerox Multifunction Printer

Please open the attached document. It was sent to you using a Xerox multifunction printer.

Attachment File Type: pdf, Multi-Page

Multifunction Printer Location: BOW  
Multifunction Printer Name: P532ZQV625416

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Log# 075-010 32625

## CROPA form (Coordinated Review of Permit Application)

### REQUEST MEMORANDUM

Date: March 26, 2025 Please return to Michael Anderson  
 To: Bill Marr, Permit Section: Bureau of Air  
Darin LeCrone, Water Pollution Control  
David Cook, Public Water Supply  
 From: Michael Anderson, Permit Section, DLPC

SUBJECT: Notice of Land Project for Coordinated Permit Review Consideration

Southwind RAS I, LLC.

Site Name

Bartlett

Site City

Land Division received a permit application on March 21, 2025 for the project identified below. It is a significant land project as defined by CROPA Rules. Please review the project description and attached documents for significance with respect to your division and respond as soon as practicable. DLPC has until April 20, 2025 to make our permit decision.

Project: Reclaimed asphalt shingles, blended with reclaimed asphalt pavement or other crushed coarse aggregate, is a cost-effective way to improve dust control, surface stabilization, patching maintenance, and private aggregate pavement projects.

Comments: \_\_\_\_\_

If you need more information about this project please contact Josh Quinn (facility contact) at phone no. 630/497-8700.

If you need further information about this application, please contact Michael A. (assigned reviewer) at phone no. 217/524-8440.

### RESPONSE MEMORANDUM

DATE: 4/29/25  
 TO: Michael Anderson Permit Section, DLPC  
 FROM: D. Rumpot Permit Section DLPC  
 SUBJECT: Determination of CROPA Significance with Respect to APC/PWS/WPC  
 Division of DLPC has reviewed the subject application and has determined that:

### Check ALL below as appropriate:

- |                            |  |    |   |
|----------------------------|--|----|---|
| (1) Project:               | <input type="checkbox"/> Is significant          | OR | <input checked="" type="checkbox"/> Is not significant    |
| (2) Project involves:      | <input type="checkbox"/> Emissions to atmosphere |    |   |
|                            | <input type="checkbox"/> Discharge to sewer      |    | <input type="checkbox"/> Waterway                         |
|                            | <input type="checkbox"/> Public water supply     |    |   |
| (3) A permit:              | <input type="checkbox"/> Is needed               |    | <input type="checkbox"/> Has been issued                  |
|                            | OR   |    | OR <input checked="" type="checkbox"/> Is not required    |
| (4) If a permit is needed: | <input type="checkbox"/> Application is in house |    | <input type="checkbox"/> Facility has been contacted      |
|                            | OR   |    | <input type="checkbox"/> Application forms have been sent |

Please coordinate future discussions about this project with:

D. Rumpot

Phone 41-3262

Comments: No permits needed for Southwind RAS  
Customers may need a construction stormwater permit  
if more than 1 acre is disturbed.



**Anderson, Michael**

---

**From:** Anderson, Michael  
**Sent:** Monday, June 30, 2025 2:54 PM  
**To:** Josh Quinn  
**Subject:** RE: Southwind RAS I, LLC; Romeoville Beneficial Use Determination

Josh,

I have completed my technical review of the Southwind RAS I, LLC – Romeoville BUD. Currently, the BUD is being reviewed by my direct supervisor.

Michael A.

---

**From:** Josh Quinn <JoshQ@grp7.com>  
**Sent:** Monday, June 30, 2025 2:39 PM  
**To:** Anderson, Michael <Michael.A.Anderson@Illinois.gov>  
**Subject:** [External] RE: Southwind RAS I, LLC; Romeoville Beneficial Use Determination

Hi Michael,

Just wanted to follow up and see if any progress has been made obtaining final approval and signature for this BUD after the additional information was provided.

Thanks,

- Josh Quinn  
C: 630.940.5789

---

**From:** Anderson, Michael <Michael.A.Anderson@Illinois.gov>  
**Sent:** Tuesday, June 17, 2025 12:45 PM  
**To:** Josh Quinn <JoshQ@grp7.com>  
**Subject:** RE: Southwind RAS I, LLC; Romeoville Beneficial Use Determination

Josh,

Great! I'll add this to my review. I appreciate your patience in all of this and will reach out if anything else comes up.

Michael A.

---

**From:** Josh Quinn <JoshQ@grp7.com>  
**Sent:** Tuesday, June 17, 2025 11:48 AM  
**To:** Anderson, Michael <Michael.A.Anderson@Illinois.gov>  
**Subject:** [External] RE: Southwind RAS I, LLC; Romeoville Beneficial Use Determination

Michael,

Thanks for the phone call today with an update on the status of the BUD for this site. I wanted to provide some additional context for your review and to better answer some of the questions raised.

- We are seeking a stand-alone BUD for the Romeoville facility, separate from the previously approved Lorang Road facility, for several reasons. First, these facilities are located in different counties and different markets. Having a BUD specific to the Romeoville facility allows us to use the RAS at the location to service several different projects and new customers.
- We hope to capitalize on the success of Lorang Road's sales to various highway townships (i.e. Kaneville and Blackberry Townships) and do the same out of Romeoville.
- This BUD will also help us reduce the overall tonnage at the site through an additional or alternative use of the RAS in its end use.
- Attached are several purchase orders for anticipated uses in 2025 and 2026. The timing of the anticipated use depends on the approval of the BUD – we will utilize the RAS in this manner as soon as the BUD is approved.

Should you have any questions or need any additional information, please do not hesitate to contact me.

Thanks for your continued assistance with getting this BUD approved.

Best regards,

**Josh Quinn | Vice-President of Safety, Environmental Services & Compliance**  
**Southwind Industries, Inc.**

(Parent Company of Bluff City Materials, Reliable Asphalt Corporation, and Southwind RAS)

C: 630.940.5789

---

**From:** Anderson, Michael <[Michael.A.Anderson@Illinois.gov](mailto:Michael.A.Anderson@Illinois.gov)>  
**Sent:** Wednesday, April 23, 2025 8:46 AM  
**To:** Josh Quinn <[JoshQ@grp7.com](mailto:JoshQ@grp7.com)>  
**Subject:** RE: Southwind RAS I, LLC; Romeoville Beneficial Use Determination

Josh,

I submitted your BUD with my approval letter for signature on April 9, 2025. Sometimes it takes a while to go through upper management as they are making sure that my work is up to par with the rest of the Illinois EPA's approval letters.

Sincerely,

Michael Anderson  
 Bureau of Land - Permit Section  
 Disposal Alternatives Unit  
 217/524-8440

---

**From:** Josh Quinn <[JoshQ@grp7.com](mailto:JoshQ@grp7.com)>  
**Sent:** Tuesday, April 22, 2025 10:08 AM  
**To:** Anderson, Michael <[Michael.A.Anderson@Illinois.gov](mailto:Michael.A.Anderson@Illinois.gov)>  
**Subject:** [External] Re: Southwind RAS I, LLC; Romeoville Beneficial Use Determination

Hi Mike,

Just checking to make sure you received the forms and whether you might be able to update me on whether the BUD was submitted for signature.

Thanks for any help you can provide!

 Josh Quinn

C: 630.940.5789

---

**From:** Anderson, Michael <[Michael.A.Anderson@Illinois.gov](mailto:Michael.A.Anderson@Illinois.gov)>  
**Sent:** Wednesday, April 9, 2025 11:10:15 AM  
**To:** Josh Quinn <[JoshQ@grp7.com](mailto:JoshQ@grp7.com)>  
**Subject:** RE: Southwind RAS I, LLC; Romeoville Beneficial Use Determination

Josh,

Great! I'll keep an eye out for it!

Michael A.

---

**From:** Josh Quinn <[JoshQ@grp7.com](mailto:JoshQ@grp7.com)>  
**Sent:** Wednesday, April 9, 2025 11:09 AM  
**To:** Anderson, Michael <[Michael.A.Anderson@Illinois.gov](mailto:Michael.A.Anderson@Illinois.gov)>  
**Subject:** [External] RE: Southwind RAS I, LLC; Romeoville Beneficial Use Determination

 Hi Michael,

As discussed Monday, you should be receiving the updated 39(i) forms requested today.

Please let me know if you have any questions or need any additional information.

Thanks,

- Josh Quinn

C: 630.940.5789

---

**From:** Anderson, Michael <[Michael.A.Anderson@Illinois.gov](mailto:Michael.A.Anderson@Illinois.gov)>  
**Sent:** Thursday, March 27, 2025 2:39 PM  
**To:** Josh Quinn <[JoshQ@grp7.com](mailto:JoshQ@grp7.com)>  
**Subject:** RE: Southwind RAS I, LLC; Romeoville Beneficial Use Determination

Josh,

I am available tomorrow and start work at 8:30am.

Sincerely,

 Michael Anderson  
Bureau of Land - Permit Section

Disposal Alternatives Unit  
217/524-8440

---

**From:** Josh Quinn <[JoshQ@grp7.com](mailto:JoshQ@grp7.com)>  
**Sent:** Thursday, March 27, 2025 2:35 PM  
**To:** Anderson, Michael <[Michael.A.Anderson@Illinois.gov](mailto:Michael.A.Anderson@Illinois.gov)>  
**Subject:** [External] Re: Southwind RAS I, LLC; Romeoville Beneficial Use Determination

Hi Michael,

I'm traveling today and not in front of my computer with my notes. Are you available for me to call you tomorrow morning?

Thanks for the quick reply on the submittal.

Talk soon

- Josh Quinn  
C: [630.940.5789](tel:630.940.5789)

---

**From:** Anderson, Michael <[Michael.A.Anderson@Illinois.gov](mailto:Michael.A.Anderson@Illinois.gov)>  
**Sent:** Wednesday, March 26, 2025 4:11:22 PM  
**To:** Josh Quinn <[JoshQ@grp7.com](mailto:JoshQ@grp7.com)>  
**Subject:** Southwind RAS I, LLC; Romeoville Beneficial Use Determination

Good afternoon Josh Quinn,

I have some questions pertaining to the Beneficial Use Determination registration that was submitted to the Illinois Environmental Protection Agency on March 20, 2025, and received on March 21, 2025. I tried calling but couldn't get ahold of you and the line wouldn't let me leave a message. When you have the time could you call me at 217/524-8440.

Thank you,

Michael Anderson  
Bureau of Land - Permit Section  
Disposal Alternatives Unit  
217/524-8440

State of Illinois - CONFIDENTIALITY NOTICE: The information contained in this communication is confidential, may be attorney-client privileged or attorney work product, may constitute inside information or internal deliberative staff communication, and is intended only for the use of the addressee. Unauthorized use, disclosure or copying of this communication or any part thereof is strictly prohibited and may be unlawful. If you have received this communication in error, please notify the sender immediately by return e-mail and destroy this communication and all copies thereof, including all attachments. Receipt by an unintended recipient does not waive attorney-client privilege, attorney work product privilege, or any other exemption from disclosure.



## Illinois Environmental Protection Agency

Bureau of Land – Field Operations Section

**Inspection Report****General Facility Information**

<b>BOL ID</b>	1970905199	<b>Evaluation Date</b>	1/26/2023
<b>USEPA ID</b>	N/A	<b>Region</b>	Des Plaines
<b>Site Name</b>	Southwind RAS LLC	<b>County</b>	Will
<b>Address</b>	5 S. Material Rd.	<b>Phone</b>	630-233-5700
<b>City/State/Zip</b>	Romeoville, IL 60446	<b>EJ Status</b>	Minority
<b>Limited English</b>	<input type="checkbox"/>	<b>Primary Language</b>	English

**Observations**

<b>Time</b>	0845 - 0930
<b>Weather Conditions</b>	Light snow
<b>Temperature</b>	22 Fahrenheit
<b>Photos Taken</b>	Yes (3)

**Evaluation Type**

Solid Waste Program - Beneficial Use Determination

**Owner**

Heidelberg Materials Midwest Aggregate Inc  
 Attn: Christopher Ward  
 300 E. John Carpenter Fwy. #1645  
 Irving, TX 75062

**Operator**

Southwind RAS LLC  
 Attn: Josh Quinn  
 2250 Southwind Blvd  
 Bartlett, IL 60103

**Inspection Participants**

<u>Person</u>	<u>Affiliation</u>	<u>Phone</u>
Jose Loeza	IEPA FOS Primary Inspector	(847) 294-4066
Donna Shehane	IEPA FOS Secondary Inspector	(847) 294-4000

**Persons Interviewed**

<u>Person</u>	<u>Phone</u>	<u>E-Mail</u>
Josh Quinn	(630) 940-5789	JoshQ@grp7.com

**Permit**

<u>Application Date</u>	<u>Log #</u>	<u>Issue Date</u>	<u>Expiration Date</u>	<u>Mod/Sp #</u>	<u>Mod/Sp Date</u>
3/26/2021	Solid Waste: BUD11-013-R2	10/14/2021	8/15/2026	Log No. BUD11-013-R2	10/14/2021
12/4/2020	Solid Waste: BUD20-016	10/7/2021	10/1/2026	Log No. BUD20-016	10/7/2021

**Active Enforcement Orders**

<u>CACO</u>	<u>Consent Decree</u>	<u>CAFO</u>	<u>IPCB</u>	<u>Federal Court</u>	<u>State Court</u>
NONE					

## ***Executive Summary***

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On January 26<sup>th</sup>, 2023, I, Jose Loeza, conducted a beneficial use determination (BUD) inspection at Southwind RAS LLC, located at 5 S. Material Rd., Romeoville, IL. 60446. The site stores and processes recycled asphalt shingles (RAS). I was accompanied by Illinois EPA inspector Donna Shehane. The inspection was conducted as part of the Illinois EPA's solid waste workplan to determine compliance with the Illinois Environmental Protection Act, Beneficial Use Determination (BUD) Application Log No. BUD11-013-R2 and BUD20-016, Illinois Tollway Construction Bulletin 10-01: Guidelines of Best Management Practices for Operations of Asphalt Shingle Recycling Facilities, and Illinois Department of Transportation Policy Memorandum: Reclaimed Asphalt Shingles (RAS) Sources. I interviewed environmental compliance manager, Josh Quinn. I observed apparent violations during the inspection.

## ***Evaluation Narrative***

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### **Background**

Southwind RAS LLC currently has two BUDs. BUD11-013-R2 is for the storage, management, and use of RAS as a raw ingredient in hot mix asphalt (HMA) pavement. BUD20-016 is for the use of RAS as an ingredient, along with fractionated reclaimed asphalt pavement (FRAP), in a pavement blend for dust control and general road improvements. BUD20-016 does not add to the maximum amount of processed and unprocessed shingles, 38,497 tons, allowed at 5 S. Material Rd. under BUD11-013-R2. The previous inspection was conducted on November 13, 2019. It resolved continuing violations from an inspection on November 16, 2016, that resulted in Violation Notice L-2016-01151 and subsequent Compliance Commitment Agreement dated March 28, 2017.

### **On-site Evaluation**

I arrived at 5. S. Material Rd. at approximately 8:45AM. Mr. Quinn received us at the entrance of the facility and took us to the scale house where I conducted the onsite interview. He gave me background information and explained how RAS is processed at the site from start to finish. Incoming loads are weighed on the scale, then an asbestos inspector screens the loads for suspected asbestos containing materials (ACM) and unauthorized waste. The loads are first dumped in a tipping bay (see photo 1) until they accumulate 125 tons of material for a sample and wait for results. The samples are tested for asbestos fibers. Loads are then taken to the unprocessed shingles storage pile (see photo 2). When needed, they order mobile grinding and screening machinery to the site. Processed RAS is stored in a separate pile (see photo 3) and sampled for asbestos once every 500 tons.

I asked Mr. Quinn to show me several documents of their operating record. However, the only document available on-site was Supply Certification Forms for suppliers of tear-off roofing shingles. Mr. Quinn said he would email the rest of the documents. We then went on a tour of the site and ended the inspection at 9:30AM.

### **Off-site Evaluation**

On January 27<sup>th</sup>, I received asbestos training certificates from 2022, a general refuse disposal receipt, monthly report for 2022, lab results from sampling, and an asbestos exposure assessment for 2022. Asbestos training is received from EarthTech Inc. in Yorkville, IL. General refuse was last picked up on November 30, 2022, by Homewood Disposal Service in Tinley Park, IL. According to their 2022 monthly summary report (see attachment A), 3571 tons of shingles were accepted, 5880 tons of RAS were shipped off site, and there are a total of 12,892 tons of material on-site. The report also included tonnage figures from 2021-2014. The last rejected load happened over three years ago. Lab reports for asbestos testing showed "None Detected" for inbound material from October 12, 2022, and outbound material from May 20, July 22, and October 13, 2022 (see attachments B-C). The asbestos exposure assessment was performed on November 15, 2022, by TrueNorth Consultants in Naperville, IL. Asbestos fibers were not detected above the OSHA 8-hour permissible exposure limit or 30-minute excursion limit (see attachment D).

On February 7<sup>th</sup>, I received asbestos exposure assessments for 2020-2021, monthly summary reports for 2020-2021, and confirmed the sampling frequency of inbound and outbound material. Exposure assessments were performed on October 12, 2020, and September 29, 2021, by TrueNorth Consultants in Naperville (see attachments E-F). Asbestos fibers were not detected above the OSHA 8-hour permissible exposure limit and 30-minute excursion limit. According to the 2020 monthly summary report, 10,229 tons of shingles were accepted, 3,742 tons of RAS were shipped off, and there was a total of 48,321 tons of material on-site. According to the 2021 monthly summary report, 5337 tons of shingles were accepted, 45,509 tons of RAS were shipped off, and there was a total of 8,149 tons of material on-site (see attachment G).

On February 9<sup>th</sup>, I received a response from Mr. Quinn to my request for additional information. Mr. Quinn showed me examples of inbound and outbound load tickets (see attachments H-I). He also confirmed that the Southwind RAS Lab in Bartlett does not have any official accreditations, but that employees are individually certified in polarized light microscopy techniques through the Microscopy Instruction Consultation and Analysis program. Also, that the 41,698 tons of outbound RAS in January and February 2021 went to Reliable Asphalt Corporation for use in hot mix asphalt (see attachment J).

On March 1<sup>st</sup>, Mr. Quinn sent me two end user affidavits from their customers (see attachments K-L).

Based on my findings of the onsite and offsite evaluation, Southwind RAS LLC is in apparent violation of the Illinois Tollway Construction Bulletin 10-01, Illinois Department of Transportation Policy Memorandum, Beneficial Use Determination Application Log No. BUD11-013-R2 and BUD20-016, and the Illinois Environmental Protection Act. First, asbestos exposure assessments should be conducted during grinding operations. The three reports from 2020-2022 all describe the duties performed as weighing, ticket writing, and stockpiling incoming loads. No report described grinding operations. Second, testing of samples should be performed by a National Institute of Standards and Technology (NIST) accredited lab. The in-house lab at Southwind RAS in Bartlett is not NIST accredited. Third, a paper or electronic copy of records should be kept at 5 S. Material Road. Illinois EPA inspectors should be able to review all records during the site visit. Fourth, Southwind RAS should have developed and maintained a recordkeeping system that is adequate to track retention time and tonnage of shingles on site. Information on the monthly summary reports appear to be inconsistent from year to year (see attachments A and G). Specifically, the ending total quantity of material in 2021 does not agree with the starting total quantity of material in 2022. There seems to be a discrepancy of about 7,052 tons of material.

<b>Summary of Apparent Violation(s)</b>			
<b>Status</b>	<b>Date</b>	<b>Violation</b>	<b>Narrative</b>
New	1/26/2023	21(a)	Cause or allow open dumping
New	1/26/2023	21(d)(1)	Conduct a waste storage, treatment, or disposal operation without a permit
New	1/26/2023	22.54(d)	No recipient of a beneficial use determination shall manage or use the material that is the subject of the determination in violation of the determination or any conditions in the determination, unless the material is managed as a waste.
New	1/26/2023	BUD Condition	BUD11-013-R2 / Condition 10: Romeoville RAS Recycling Facility shall retain copies of all operating records, including any affidavits, records of retention times, training records, daily reports, inspection reports, incident reports, material profile identification sheets, re-certifications, certifications of representative samples, laboratory analyses, special analysis plans, any waiver of requirements at the office of the facility for five years after this authorization expires. These records shall be made available to the Illinois EPA or their designee through intergovernmental agreement upon request.
New	1/26/2023	BUD Condition	BUD 11-013-R2 / Condition 11: The RAS shall be inspected upon receipt at Romeoville RAS Recycling Facility and loads which are not clean shall be rejected. A not clean load is defined by a load containing any amount of non-shingle materials such as paper, plastic, flashing or wood. Any load with visible non-shingle material must be rejected. As the clean load of shingles is unloaded into the raw shingles storage area, any concealed non-shingle material detected during unloading must be removed immediately during the unloading process. Acceptance of waste is not permitted at the site. Shingles shall be managed onsite in accordance with the applications and the conditions of this approval. Shingles must not be abandoned or allowed to escape into the environment. The clean material shall be stockpiled and tested in accordance with the Best Management Practices (BMPs) submitted and approved as described in your application Log No. BUD11-013-R2.
New	1/26/2023	BUD Condition	BUD11-013-R2 / Condition 15: The maximum amount of processed and unprocessed shingles stored at Romeoville RAS Recycling Facility, 5 South Material Road, Romeoville, Illinois 60446 is 38,497 tons at any one time. The basis of this "hard cap" is a base cap of 10,000 tons plus a 4-year rolling average of an additional 7,124 tons per year as the "marking-based cap". All shingles received at the site shall be processed onsite and removed from the site within 4 years of initial acceptance. At least 25% of the facility's entire inventory present during a calendar year must be removed during the following calendar year. Stored volumes of the total combined volume of processed and unprocessed shingles may exceed 39,000 tons only if the facility can produce documentation (i.e., contracts, order requests, or letters of intent) from either an IDOR, Illinois State Toll Highway Authority, or private hot-mix asphalt producer showing the entire volume of processed and unprocessed shingles exceeding 38,497 tons will be needed by a RAS user authorized under Condition 12 above, within the 4-year period after the shingles are received. This documentation must be provided within 30 days after requested verbally or in writing by the Illinois EPA or its designee through intergovernmental agreement upon request during normal business hours.
New	1/26/2023	BUD Condition	BUD11-013-R2 / Condition 17: Shingles shall be processed to meet the desired IDOT or Illinois State Toll Highway Authority specification. Material meeting the

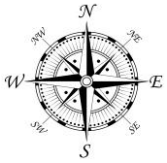


			desired specification shall be conveyed to the on-site processed shingles storage area. Oversized material must be conveyed back to the grinder, reground and re-screened to meet the size specification. Records of tonnage of tear-off shingles and retention times shall be compiled monthly and maintained in bound or electronically imaged chronological files.
New	1/26/2023	BUD Condition	BUD11-013-R2 / Condition 18: Southwind RAS I, LLC shall develop and maintain a recordkeeping system that is adequate to track the storage time on site and volumes of shingles to demonstrate compliance with conditions 15 and 17 above.
New	1/26/2023	BUD Condition	BUD11-013-R2 / Condition 20: The IDOT specification for shingle recycling shall be conducted in accordance with IDOT's contract specifications for Reclaimed Asphalt Shingles (RAS) and Policy Memorandum-Reclaimed Asphalt Shingles (RAS) Sources. The Illinois Tollway specification for shingle recycling shall be conducted in accordance with Construction Bulletin 10-01: Guidelines of Best Management Practices for the Operation of Asphalt Shingle Recycling Facilities. Any deviation from these procedures or specifications, except to comply with IDOT updates from specifying Reclaimed Asphalt Shingles (RAS) and Policy Memorandum-Reclaimed Asphalt Shingles (RAS) Sources, is subject to the requirements of Condition 1.
New	1/26/2023	BUD Condition	BUD11-013-R2 / Condition 21: This BUD only applies to shingles that have been processed following the shingles control plan presented in this application for testing, and removal of material containing asbestos and using method EPA600/R-93/116 to detect asbestos in the shingles.

### ***Attachment Listing***

<b>Type</b>	<b>Description</b>
Miscellaneous	Attachment A: Monthly summary report for 2022 and history report for total quantity on hand.
Miscellaneous	Attachment B: Lab results for outbound material.
Miscellaneous	Attachment C: Lab results for inbound material.
Miscellaneous	Attachment D: Asbestos exposure assessment for 2022.
Miscellaneous	Attachment E: Asbestos exposure assessment for 2021.
Miscellaneous	Attachment F: Asbestos exposure assessment for 2020.
Miscellaneous	Attachment G: Monthly summary report for 2021 and 2020.
Receipt	Attachment H: Inbound load ticket.
Receipt	Attachment I: Outbound load ticket.
Email	Attachment J: Email correspondence.
Miscellaneous	Attachment K: End user affidavit.
Miscellaneous	Attachment L: End user affidavit.

## Site Diagram





Digital Photographs



Bureau ID: 1970905199  
Photo No.: 1  
Photo Date: 1/26/2023  
Photo Time: 9:16:49 AM  
Direction: Northwest  
Taken By: Jose Loeza

Incoming load tipping bays and pile of unprocessed shingles.



Bureau ID: 1970905199  
Photo No.: 2  
Photo Date: 1/26/2023  
Photo Time: 9:17:51 AM  
Direction: Northwest  
Taken By: Jose Loeza

Pile of unprocessed shingles.

Bureau ID: 1970905199

Photo No.: 3

Photo Date: 1/26/2023

Photo Time: 9:18:49 AM

Direction: Southwest

Taken By: Jose Loeza

Pile of processed shingles.





# ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276 • (217) 782-3397

JB PRITZKER, GOVERNOR

JOHN J. KIM, DIRECTOR

(217)524-3300

TDD 217/524-2891

CERTIFIED MAIL # 7021 2720 0000 2253 3541  
RETURN RECEIPT REQUESTED

April 11, 2023

Southwind RAS LLC  
Attn: Josh Quinn  
2250 Southwind Boulevard  
Bartlett, Illinois 60103

Re: Violation Notice L-2023-00094  
BOL #1970905199 - Will County  
Romeoville/Southwind RAS LLC  
Compliance File

Dear Josh Quinn:

This constitutes a Violation Notice pursuant to Section 31(a)(1) of the Illinois Environmental Protection Act, 415 ILCS 5/31(a)(1), and is based on an inspection completed on January 26, 2023 by representatives of the Illinois Environmental Protection Agency ("Illinois EPA").

The Illinois EPA hereby provides notice of alleged violations of environmental laws, regulations, or permits as set forth in the attachment to this notice. The attachment includes an explanation of the activities that the Illinois EPA believes may resolve the specified alleged violations, including an estimate of a reasonable time period to complete the necessary activities. Due to the nature and seriousness of the alleged violations, please be advised that resolution of the violations may also require the involvement of a prosecutorial authority for purposes that may include, among others, the imposition of statutory penalties.

A written response, which may include a request for a meeting with representatives of the Illinois EPA, must be submitted via certified mail to the Illinois EPA within 45 days of receipt of this notice. If a meeting is requested, it shall be held within 60 days of receipt of this notice. The response must include information in rebuttal, explanation, or justification of each alleged violation and a statement indicating whether you wish to enter into a Compliance Commitment Agreement ("CCA") pursuant to Section 31(a) of the Act. If you wish to enter into a CCA, the written response must also include proposed terms for the CCA, including dates for achieving each commitment, and may include a statement that compliance has been achieved for some or all of the alleged violations. The proposed terms of the CCA should contain sufficient detail and must include steps to be taken to achieve compliance and the necessary dates by which compliance will be achieved.

The Illinois EPA will review the proposed terms for a CCA provided by you and, within 30 days of receipt, will respond with either a proposed CCA or a notice that no CCA will be issued by the Illinois EPA. If the Illinois EPA sends a proposed CCA, you must respond in writing either by

2125 S. First Street, Champaign, IL 61820 (217) 278-5800  
1101 Eastport Plaza Dr., Suite 100, Collinsville, IL 62234 (618) 346-5120  
9511 Harrison Street, Des Plaines, IL 60016 (847) 294-4000  
595 S. State Street, Elgin, IL 60123 (847) 608-3131

2309 W. Main Street, Suite 116, Marion, IL 62959 (618) 993-7200  
412 SW Washington Street, Suite D, Peoria, IL 61602 (309) 671-3022  
4302 N. Main Street, Rockford, IL 61103 (815) 987-7760



agreeing to and signing the proposed CCA or by notifying the Illinois EPA that you reject the terms of the proposed CCA.

If a timely written response to this Violation Notice is not provided, it shall be considered a waiver of the opportunity to respond and meet, and the Illinois EPA may proceed with referral to a prosecutorial authority.

Written communications should be directed to:

Illinois Environmental Protection Agency  
Attn: Victoria Slayton  
Bureau of Land # 24  
1021 North Grand Ave. East  
Springfield, Illinois 62794-9276

Please include the Violation Notice Number L-2023-00094 and the Site Identification Number 1970905199 on all written communications and supporting documents.

The complete requirements of the Illinois Environmental Protection Act and any Illinois Pollution Control Board regulations cited herein or in the inspection report can be viewed at:

<http://www.ipcb.state.il.us/SLR/TheEnvironmentalProtectionAct.asp>

and

<http://www.ipcb.state.il.us/SLR/PCBandIEPAEnvironmentalRegulations-Title35.asp>

If you have questions regarding this matter, please contact Jose Loeza at the following email address: [Jose.Loeza@Illinois.gov](mailto:Jose.Loeza@Illinois.gov) or at (847) 294-4066.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Victoria Slayton', with a stylized flourish at the end.

Victoria Slayton, MPA  
Deputy Section Manager  
Materials Management and Compliance Section  
Illinois EPA

Enclosure: Violation Notice Attachment

## **Violation Notice Attachment**

Southwind RAS LLC (“Respondent”) operates the business located at 5 South Material Road in Romeoville, Illinois (“the subject property”). Southwind RAS LLC is a/k/a Southwind RAS I LLC and f/k/a Romeoville RAS Recycling Facility. On January 26, 2023, the Illinois EPA inspected the subject property. During the inspection, apparent violations of the Illinois Environmental Protection Act and Permit No. Solid Waste: BUD11-013-R2 (the “Permit”) were observed. These apparent violations are discussed in further detail below.

### **1. Applicable Authorities**

- i) Illinois law prohibits any person from:
  - a) Causing or allowing open dumping. *See* 415 ILCS 5/21(a).
  - b) Conducting any waste-storage, waste-treatment, or waste-disposal operation without a permit granted by the Illinois EPA or in violation of any conditions imposed by such permit. *See* 415 ILCS 5/21(d)(1).
  - c) Using a material subject to a beneficial use determination in violation of the conditions of the determination, unless the material is managed as waste. *See* 415 ILCS 5/22.54(d).
- ii) The Permit requires:
  - a) Romeoville RAS Recycling Facility shall retain copies of all operating records, including any affidavits, records of retention times, training records, daily reports, inspection reports, incident reports, material profile identification sheets, re-certifications, certifications of representative samples, laboratory analyses, special analysis plans, any waiver of requirements at the office of the facility for five years after this authorization expires. These records shall be made available to the Illinois EPA or their designee through intergovernmental agreement upon request. *See* Permit Condition 10.
  - b) The RAS shall be inspected upon receipt at Romeoville RAS Recycling Facility and loads which are not clean shall be rejected. A not clean load is defined by a load containing any amount of non-shingle materials such as paper, plastic, flashing or wood. Any load with visible nonshingle material must be rejected. As the clean load of shingles is unloaded into the raw shingles storage area, any concealed non-shingle material detected during unloading must be removed immediately during the unloading process.

Acceptance of waste is not permitted at the site. Shingles shall be managed onsite in accordance with the applications and the conditions of this approval. Shingles must not be abandoned or allowed to escape into the environment. The clean material shall be stockpiled and tested in accordance with the Best Management Practices (BMPs) submitted and approved as described in your application Log No. BUD11-013-R2. *See* Permit Condition 11.

- c) The maximum amount of processed and unprocessed shingles stored at Romeoville RAS Recycling Facility, 5 South Material Road, Romeoville, Illinois 60446 is 38,497 tons at any one time. The basis of this "hard cap" is a base cap of 10,000 tons plus a 4-year rolling average of an additional 7,124 tons per year as the "marking-based cap". All shingles received at the site shall be processed onsite and removed from the site within 4 years of initial acceptance. At least 25% of the facility's entire inventory present during a calendar year must be removed during the following calendar year. Stored volumes of the total combined volume of processed and unprocessed shingles may exceed 39,000 tons only if the facility can produce documentation (i.e., contracts, order requests, or letters of intent) from either an IDOR, Illinois State Toll Highway Authority, or private hot-mix asphalt producer showing the entire volume of processed and unprocessed shingles exceeding 38,497 tons will be needed by a RAS user authorized under Condition 12 above, within the 4-year period after the shingles are received. This documentation must be provided within 30 days after requested verbally or in writing by the Illinois EPA or its designee through intergovernmental agreement upon request during normal business hours. *See* Permit Condition 15.
- d) Shingles shall be processed to meet the desired IDOT or Illinois State Toll Highway Authority specification. Material meeting the Page 5 desired specification shall be conveyed to the on-site processed shingles storage area. Oversized material must be conveyed back to the grinder, reground and rescreened to meet the size specification. Records of tonnage of tear-off shingles and retention times shall be compiled monthly and maintained in bound or electronically imaged chronological files. *See* Permit Condition 17.
- e) Southwind RAS I, LLC shall develop and maintain a recordkeeping system that is adequate to track the storage time on site and volumes of shingles to demonstrate compliance with conditions 15 and 17 above. *See* Permit Condition 18.
- f) The IDOT specification for shingle recycling shall be conducted in accordance with IDOT's contract specifications for Reclaimed Asphalt

Shingles (RAS) and Policy Memorandum-Reclaimed Asphalt Shingles (RAS) Sources. The Illinois Tollway specification for shingle recycling shall be conducted in accordance with Construction Bulletin 10-01: Guidelines of Best Management Practices for the Operation of Asphalt Shingle Recycling Facilities. Any deviation from these procedures or specifications, except to comply with IDOT updates from specifying Reclaimed Asphalt Shingles (RAS) and Policy Memorandum-Reclaimed Asphalt Shingles (RAS) Sources, is subject to the requirements of Condition 1. *See* Permit Condition 20.

- g) This BUD only applies to shingles that have been processed following the shingles control plan presented in this application for testing, and removal of material containing asbestos and using method EPA600/R-93/116 to detect asbestos in the shingles. *See* Permit Condition 21.

## 2. Alleged Violations

- i) The Illinois EPA inspector observed open dumping at the subject property, which violates Illinois law. *See* 415 ILCS 5/21(a).
- ii) The Illinois EPA inspector observed evidence of asbestos exposure assessments not being done during grinding operations at the subject property, which violates Illinois law and the Permit. *See* 415 ILCS 5/21(d)(1); 415 ILCS 5/22.54(d); Permit Condition 11; Permit Condition 21.
- iii) The subject property is not testing samples using a National Institute of Standards and Technology (“NIST”) accredited lab, which violates Illinois law and the Permit. *See* 415 ILCS 5/21(d)(1); Permit Condition 17; Permit Condition 20.
- iv) The Illinois EPA inspector observed inconsistent records with discrepancies in the quantities of materials at the subject property, which violates Illinois law and the Permit. *See* 415 ILCS 5/21(d)(1); Permit Condition 10; Permit Condition 15; Permit Condition 17; Permit Condition 18.
- v) The subject property did not have all required records available for inspection, which violates Illinois law and the Permit. *See* 415 ILCS 5/21(d)(1); Permit Condition 10; Permit Condition 17.

## 3. Suggested Resolutions

Respondent should take remedial action to address the above-referenced violations, including:

- i) **Immediately upon receipt of this Violation Notice (“VN”),** cease open dumping at the subject property.



- ii) **Immediately upon receipt of this Violation Notice (“VN”),** begin conducting asbestos exposure assessments during grinding operations.
- iii) **Immediately upon receipt of this VN,** begin maintaining a paper or electronic copy of the operating record at the subject property.
- iv) **Within 45 calendar days of receipt of this VN,** begin submitting samples of shingles to a NIST accredited lab for testing.
- v) **Within 45 calendar days of receipt of this VN,** develop and maintain a recordkeeping system that will adequately track retention time and tonnage of the shingles on-site.
- vi) **Within 45 calendar days of receipt of this VN,** provide an explanation for the inconsistent information on the monthly reports and the material discrepancies.
- vii) Recordkeeping. **Within 45 calendar days of receipt of this VN,** the Respondent shall submit copies of records reflecting remedial actions undertaken to address the above-referenced violations, including but not limited to an explanation of the discrepancies, and photographs reflecting the completion of the suggested resolutions identified above, to:

*Illinois EPA Des Plaines Regional Office  
Attn: Jose Loeza  
9511 Harrison Street  
Des Plaines, Illinois 60016*

## Illinois Environmental Protection Agency

Bureau of Land – Field Operations Section

## Inspection Report

**General Facility Information**

<b>BOL ID</b>	1970905199	<b>Evaluation Date</b>	1/26/2023
<b>USEPA ID</b>	N/A	<b>Region</b>	Des Plaines
<b>Site Name</b>	Southwind RAS LLC	<b>County</b>	Will
<b>Address</b>	5 S. Material Rd.	<b>Phone</b>	630-233-5700
<b>City/State/Zip</b>	Romeoville, IL 60446	<b>EJ Status</b>	Minority
<b>Limited English</b>	<input type="checkbox"/>	<b>Primary Language</b>	English

**Observations**

<b>Time</b>	0845 - 0930
<b>Weather Conditions</b>	Light snow
<b>Temperature</b>	22 Fahrenheit
<b>Photos Taken</b>	Yes (3)

**Evaluation Type**

Solid Waste Program - Beneficial Use Determination

**Owner**

Heidelberg Materials Midwest Aggregate Inc  
 Attn: Christopher Ward  
 300 E. John Carpenter Fwy. #1645  
 Irving, TX 75062

**Operator**

Southwind RAS LLC  
 Attn: Josh Quinn  
 2250 Southwind Blvd  
 Bartlett, IL 60103

**Inspection Participants**

<u>Person</u>	<u>Affiliation</u>	<u>Phone</u>
Jose Loeza	IEPA FOS Primary Inspector	(847) 294-4066
Donna Shehane	IEPA FOS Secondary Inspector	(847) 294-4000

**Persons Interviewed**

<u>Person</u>	<u>Phone</u>	<u>E-Mail</u>
Josh Quinn	(630) 940-5789	JoshQ@grp7.com

**Permit**

<u>Application Date</u>	<u>Log #</u>	<u>Issue Date</u>	<u>Expiration Date</u>	<u>Mod/Sp #</u>	<u>Mod/Sp Date</u>
3/26/2021	Solid Waste: BUD11-013-R2	10/14/2021	8/15/2026	Log No. BUD11-013-R2	10/14/2021
12/4/2020	Solid Waste: BUD20-016	10/7/2021	10/1/2026	Log No. BUD20-016	10/7/2021

**Active Enforcement Orders**

<u>CACO</u>	<u>Consent Decree</u>	<u>CAFO</u>	<u>IPCB</u>	<u>Federal Court</u>	<u>State Court</u>
NONE					

## ***Executive Summary***

---

On January 26<sup>th</sup>, 2023, I, Jose Loeza, conducted a beneficial use determination (BUD) inspection at Southwind RAS LLC, located at 5 S. Material Rd., Romeoville, IL. 60446. The site stores and processes recycled asphalt shingles (RAS). I was accompanied by Illinois EPA inspector Donna Shehane. The inspection was conducted as part of the Illinois EPA's solid waste workplan to determine compliance with the Illinois Environmental Protection Act, Beneficial Use Determination (BUD) Application Log No. BUD11-013-R2 and BUD20-016, Illinois Tollway Construction Bulletin 10-01: Guidelines of Best Management Practices for Operations of Asphalt Shingle Recycling Facilities, and Illinois Department of Transportation Policy Memorandum: Reclaimed Asphalt Shingles (RAS) Sources. I interviewed environmental compliance manager, Josh Quinn. I observed apparent violations during the inspection.

## ***Evaluation Narrative***

---

### **Background**

Southwind RAS LLC currently has two BUDs. BUD11-013-R2 is for the storage, management, and use of RAS as a raw ingredient in hot mix asphalt (HMA) pavement. BUD20-016 is for the use of RAS as an ingredient, along with fractionated reclaimed asphalt pavement (FRAP), in a pavement blend for dust control and general road improvements. BUD20-016 does not add to the maximum amount of processed and unprocessed shingles, 38,497 tons, allowed at 5 S. Material Rd. under BUD11-013-R2. The previous inspection was conducted on November 13, 2019. It resolved continuing violations from an inspection on November 16, 2016, that resulted in Violation Notice L-2016-01151 and subsequent Compliance Commitment Agreement dated March 28, 2017.

### **On-site Evaluation**

I arrived at 5. S. Material Rd. at approximately 8:45AM. Mr. Quinn received us at the entrance of the facility and took us to the scale house where I conducted the onsite interview. He gave me background information and explained how RAS is processed at the site from start to finish. Incoming loads are weighed on the scale, then an asbestos inspector screens the loads for suspected asbestos containing materials (ACM) and unauthorized waste. The loads are first dumped in a tipping bay (see photo 1) until they accumulate 125 tons of material for a sample and wait for results. The samples are tested for asbestos fibers. Loads are then taken to the unprocessed shingles storage pile (see photo 2). When needed, they order mobile grinding and screening machinery to the site. Processed RAS is stored in a separate pile (see photo 3) and sampled for asbestos once every 500 tons.

I asked Mr. Quinn to show me several documents of their operating record. However, the only document available on-site was Supply Certification Forms for suppliers of tear-off roofing shingles. Mr. Quinn said he would email the rest of the documents. We then went on a tour of the site and ended the inspection at 9:30AM.

### **Off-site Evaluation**

On January 27<sup>th</sup>, I received asbestos training certificates from 2022, a general refuse disposal receipt, monthly report for 2022, lab results from sampling, and an asbestos exposure assessment for 2022. Asbestos training is received from EarthTech Inc. in Yorkville, IL. General refuse was last picked up on November 30, 2022, by Homewood Disposal Service in Tinley Park, IL. According to their 2022 monthly summary report (see attachment A), 3571 tons of shingles were accepted, 5880 tons of RAS were shipped off site, and there are a total of 12,892 tons of material on-site. The report also included tonnage figures from 2021-2014. The last rejected load happened over three years ago. Lab reports for asbestos testing showed "None Detected" for inbound material from October 12, 2022, and outbound material from May 20, July 22, and October 13, 2022 (see attachments B-C). The asbestos exposure assessment was performed on November 15, 2022, by TrueNorth Consultants in Naperville, IL. Asbestos fibers were not detected above the OSHA 8-hour permissible exposure limit or 30-minute excursion limit (see attachment D).

On February 7<sup>th</sup>, I received asbestos exposure assessments for 2020-2021, monthly summary reports for 2020-2021, and confirmed the sampling frequency of inbound and outbound material. Exposure assessments were performed on October 12, 2020, and September 29, 2021, by TrueNorth Consultants in Naperville (see attachments E-F). Asbestos fibers were not detected above the OSHA 8-hour permissible exposure limit and 30-minute excursion limit. According to the 2020 monthly summary report, 10,229 tons of shingles were accepted, 3,742 tons of RAS were shipped off, and there was a total of 48,321 tons of material on-site. According to the 2021 monthly summary report, 5337 tons of shingles were accepted, 45,509 tons of RAS were shipped off, and there was a total of 8,149 tons of material on-site (see attachment G).

On February 9<sup>th</sup>, I received a response from Mr. Quinn to my request for additional information. Mr. Quinn showed me examples of inbound and outbound load tickets (see attachments H-I). He also confirmed that the Southwind RAS Lab in Bartlett does not have any official accreditations, but that employees are individually certified in polarized light microscopy techniques through the Microscopy Instruction Consultation and Analysis program. Also, that the 41,698 tons of outbound RAS in January and February 2021 went to Reliable Asphalt Corporation for use in hot mix asphalt (see attachment J).

On March 1<sup>st</sup>, Mr. Quinn sent me two end user affidavits from their customers (see attachments K-L).

Based on my findings of the onsite and offsite evaluation, Southwind RAS LLC is in apparent violation of the Illinois Tollway Construction Bulletin 10-01, Illinois Department of Transportation Policy Memorandum, Beneficial Use Determination Application Log No. BUD11-013-R2 and BUD20-016, and the Illinois Environmental Protection Act. First, asbestos exposure assessments should be conducted during grinding operations. The three reports from 2020-2022 all describe the duties performed as weighing, ticket writing, and stockpiling incoming loads. No report described grinding operations. Second, testing of samples should be performed by a National Institute of Standards and Technology (NIST) accredited lab. The in-house lab at Southwind RAS in Bartlett is not NIST accredited. Third, a paper or electronic copy of records should be kept at 5 S. Material Road. Illinois EPA inspectors should be able to review all records during the site visit. Fourth, Southwind RAS should have developed and maintained a recordkeeping system that is adequate to track retention time and tonnage of shingles on site. Information on the monthly summary reports appear to be inconsistent from year to year (see attachments A and G). Specifically, the ending total quantity of material in 2021 does not agree with the starting total quantity of material in 2022. There seems to be a discrepancy of about 7,052 tons of material.

<b>Summary of Apparent Violation(s)</b>			
<b>Status</b>	<b>Date</b>	<b>Violation</b>	<b>Narrative</b>
New	1/26/2023	21(a)	Cause or allow open dumping
New	1/26/2023	21(d)(1)	Conduct a waste storage, treatment, or disposal operation without a permit
New	1/26/2023	22.54(d)	No recipient of a beneficial use determination shall manage or use the material that is the subject of the determination in violation of the determination or any conditions in the determination, unless the material is managed as a waste.
New	1/26/2023	BUD Condition	BUD11-013-R2 / Condition 10: Romeoville RAS Recycling Facility shall retain copies of all operating records, including any affidavits, records of retention times, training records, daily reports, inspection reports, incident reports, material profile identification sheets, re-certifications, certifications of representative samples, laboratory analyses, special analysis plans, any waiver of requirements at the office of the facility for five years after this authorization expires. These records shall be made available to the Illinois EPA or their designee through intergovernmental agreement upon request.
New	1/26/2023	BUD Condition	BUD 11-013-R2 / Condition 11: The RAS shall be inspected upon receipt at Romeoville RAS Recycling Facility and loads which are not clean shall be rejected. A not clean load is defined by a load containing any amount of non-shingle materials such as paper, plastic, flashing or wood. Any load with visible non-shingle material must be rejected. As the clean load of shingles is unloaded into the raw shingles storage area, any concealed non-shingle material detected during unloading must be removed immediately during the unloading process. Acceptance of waste is not permitted at the site. Shingles shall be managed onsite in accordance with the applications and the conditions of this approval. Shingles must not be abandoned or allowed to escape into the environment. The clean material shall be stockpiled and tested in accordance with the Best Management Practices (BMPs) submitted and approved as described in your application Log No. BUD11-013-R2.
New	1/26/2023	BUD Condition	BUD11-013-R2 / Condition 15: The maximum amount of processed and unprocessed shingles stored at Romeoville RAS Recycling Facility, 5 South Material Road, Romeoville, Illinois 60446 is 38,497 tons at any one time. The basis of this "hard cap" is a base cap of 10,000 tons plus a 4-year rolling average of an additional 7,124 tons per year as the "marking-based cap". All shingles received at the site shall be processed onsite and removed from the site within 4 years of initial acceptance. At least 25% of the facility's entire inventory present during a calendar year must be removed during the following calendar year. Stored volumes of the total combined volume of processed and unprocessed shingles may exceed 39,000 tons only if the facility can produce documentation (i.e., contracts, order requests, or letters of intent) from either an IDOR, Illinois State Toll Highway Authority, or private hot-mix asphalt producer showing the entire volume of processed and unprocessed shingles exceeding 38,497 tons will be needed by a RAS user authorized under Condition 12 above, within the 4-year period after the shingles are received. This documentation must be provided within 30 days after requested verbally or in writing by the Illinois EPA or its designee through intergovernmental agreement upon request during normal business hours.
New	1/26/2023	BUD Condition	BUD11-013-R2 / Condition 17: Shingles shall be processed to meet the desired IDOT or Illinois State Toll Highway Authority specification. Material meeting the

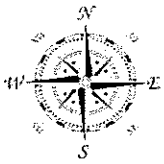


			desired specification shall be conveyed to the on-site processed shingles storage area. Oversized material must be conveyed back to the grinder, reground and re-screened to meet the size specification. Records of tonnage of tear-off shingles and retention times shall be compiled monthly and maintained in bound or electronically imaged chronological files.
New	1/26/2023	BUD Condition	BUD11-013-R2 / Condition 18: Southwind RAS I, LLC shall develop and maintain a recordkeeping system that is adequate to track the storage time on site and volumes of shingles to demonstrate compliance with conditions 15 and 17 above.
New	1/26/2023	BUD Condition	BUD11-013-R2 / Condition 20: The IDOT specification for shingle recycling shall be conducted in accordance with IDOT's contract specifications for Reclaimed Asphalt Shingles (RAS) and Policy Memorandum-Reclaimed Asphalt Shingles (RAS) Sources. The Illinois Tollway specification for shingle recycling shall be conducted in accordance with Construction Bulletin 10-01: Guidelines of Best Management Practices for the Operation of Asphalt Shingle Recycling Facilities. Any deviation from these procedures or specifications, except to comply with IDOT updates from specifying Reclaimed Asphalt Shingles (RAS) and Policy Memorandum-Reclaimed Asphalt Shingles (RAS) Sources, is subject to the requirements of Condition 1.
New	1/26/2023	BUD Condition	BUD11-013-R2 / Condition 21: This BUD only applies to shingles that have been processed following the shingles control plan presented in this application for testing, and removal of material containing asbestos and using method EPA600/R-93/116 to detect asbestos in the shingles.

### Attachment Listing

Type	Description
Miscellaneous	Attachment A: Monthly summary report for 2022 and history report for total quantity on hand.
Miscellaneous	Attachment B: Lab results for outbound material.
Miscellaneous	Attachment C: Lab results for inbound material.
Miscellaneous	Attachment D: Asbestos exposure assessment for 2022.
Miscellaneous	Attachment E: Asbestos exposure assessment for 2021.
Miscellaneous	Attachment F: Asbestos exposure assessment for 2020.
Miscellaneous	Attachment G: Monthly summary report for 2021 and 2020.
Receipt	Attachment H: Inbound load ticket.
Receipt	Attachment I: Outbound load ticket.
Email	Attachment J: Email correspondence.
Miscellaneous	Attachment K: End user affidavit.
Miscellaneous	Attachment L: End user affidavit.

## Site Diagram





Bureau ID: 1970905199  
Photo No.: 1  
Photo Date: 1/26/2023  
Photo Time: 9:16:49 AM  
Direction: Northwest  
Taken By: Jose Loeza

Incoming load tipping bays and pile of unprocessed shingles.



Bureau ID: 1970905199  
Photo No.: 2  
Photo Date: 1/26/2023  
Photo Time: 9:17:51 AM  
Direction: Northwest  
Taken By: Jose Loeza

Pile of unprocessed shingles.



Bureau ID: 1970905199

Photo No.: 3

Photo Date: 1/26/2023

Photo Time: 9:18:49 AM

Direction: Southwest

Taken By: Jose Loeza

Pile of processed shingles.

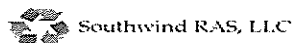
Romeoville History (Tonnage)

MONTH	INBOUND	OUTBOUND	QUANTITY ON HAND	RETENTION TIME (IN YRS)
2014	13645	0	13645	1
2015	18392	12964	19073	2
2016	24623	2486	41210	3
2017	15095	4126	52179	1
2018	7077	11674	47582	2
2019	10258	8954	48886	3
2020	10229	3742	55373	1
2021	5337	45509	15201	2
2022	3571	5880	12892	1
	108227	95335	0	16

Romeoville YTD 2022 (Tonnage)

MONTH	INBOUND	OUTBOUND	QUANTITY ON HAND	CHOP	TROMMEL	BLEND	TRASH	STEEL	% Non Recycle
Jan	20	0	15221	0	0	0		0	0.0000%
Feb	0	0	15221	0	0	0		0	0.0000%
Mar	45	22	15244	0	0	0		0	0.0000%
Apr	431	46	15629	0	0	0		0	0.0000%
May	403	42	15990	0	0	0		4	0.0000%
Jun	754	691	16053	0	1500	0		0	0.0000%
Jul	430	92	16391	0	0	0		0	0.0000%
Aug	480	1285	15586	6150	750	0		23	0.0000%
Sep	298	1909	13975	2400	700	0		21	0.0000%
Oct	250	1504	12721	0	600	0		0	0.0000%
Nov	414	289	12846	0	0	0		0	0.0000%
Dec	46	0	12892	0	0	0		0	0.0000%
	3571	5880	12892	8550	3550	0	0	48	





2250 SOUTHWIND BLVD.  
BARTLETT, ILLINOIS 60103  
PHONE: 630-233-5700 FAX: 630-524-9020

Page 1 of 1

## PLM LABORATORY REPORT

<b>METHOD:</b>		<u>EPA/600/R-93/116 July 1993</u>		<b>REPORT DATE:</b>		<u>5/20/2022 7/22/2022 10/13/2022</u>	
<b>CLIENT:</b>		<u>PLM w/ Dispersion Staining</u>		<b>DATE RECEIVED:</b>		<u>5/23/2022 7/25/2022 10/14/2022</u>	
<b>ATTENTION:</b>		<u>Southwind RAS</u>		<b>JOB LOCATION:</b>		<u>Romeoville Romeoville Romeoville</u>	
<b>email:</b>		<u>joshq@grp7.com</u>					

LAB SAMPLE#	CLIENT SAMPLE#	COLOR	DESCRIPTION LOCATION	ASBESTOS TYPE	%	FIBERS	%	MATRIX	%
1	052022-008-01G	Black	Outbound Material-Ground	ND					
2	052022-008-02G	Black	Outbound Material-Ground	ND					
1	072222-008-01G	Black	Outbound Material-Ground	ND					
2	072222-008-02G	Black	Outbound Material-Ground	ND					
1	101322-008-01G	Black	Outbound Material-Ground	ND					
2	101322-008-02G	Black	Outbound Material-Ground	ND					

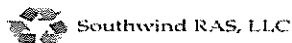
  

<b>Analysis Comments:</b>  Samples analyzed according to the EPA/600/r-93 116 July 1993 titled Method for the Determination of Asbestos in Bulk Building Materials. Further testing by Gravimetric or TEM Methods are recommended for samples that are non-friable such as float tiles, mastics, etc. Report shall not be reproduced except in full, without the written approval of the laboratory. Laboratory results pertain to those delivered for analysis. Samples will be discarded if not notified by the client within 90 days.	<b>CODES ASBESTOS</b> ND-None Detected CHRY-Chrysotile AMOS-Amosite CROC-Crocidolite TREM-Tremolite ACTN-Actinolite Anth-Anthophyllite	<b>CODES OTHER FIBERS</b> PGBL-Fibrous Glass CELL-Cellulose SYN-Synthetic WOLL-Wollastonite H-Hair O-Other (Specify)	<b>CODES MATRIX</b> G-Gypsum C-Calcium Carbonate M-Mica O-Other Matrix

ANALYZED BY - Erik Lindahl      Quality Control Technician

10/14/2022

DATE ANALYZED



2250 SOUTHWIND BLVD.  
BARTLETT, ILLINOIS 60103  
PHONE: 630-233-5700 FAX: 630-524-9020

Page 1 of 1

## PLM LABORATORY REPORT

<b>METHOD:</b>		<u>EPA/600/R-93/116 July 1993</u>		<b>REPORT DATE:</b>		<u>10/12/2022</u>			
		<u>PLM w/ Dispersion Staining</u>		<b>DATE RECEIVED:</b>		<u>10/14/2022</u>			
<b>CLIENT:</b>		<u>Southwind RAS</u>		<b>JOB LOCATION:</b>		<u>Romeoville</u>			
<b>ATTENTION:</b>		<u>Josh Quinn</u>							
<b>email:</b>		<u>joshq@grp7.com</u>							

LAB SAMPLE#	CLIENT SAMPLE#	COLOR	DESCRIPTION LOCATION	ASBESTOS TYPE	%	FIBERS	%	MATRIX	%
1	092622-008-011-3	Blue	Incoming Roofing Material	ND					
2	092622-008-021-3	Brown	Incoming Roofing Material	ND					
3	092622-008-041	Gray	Incoming Roofing Material	ND					
4	092622-008-011	White	Incoming Roofing Material	ND					
5	092622-008-031-3	Blue	Incoming Roofing Material	ND					
6	092622-008-031-3	Black	Incoming Roofing Material	ND					

<b>Analysis Comments:</b>  Samples analyzed according to the EPA/600/r-93 116 July 1993 titled Method for the Determination of Asbestos in Bulk Building Materials. Further testing by Gravimetric or TEM Methods are recommended for samples that are non-friable such as float tiles, mastics, etc. Report shall not be reproduced except in full, without the written approval of the laboratory. Laboratory results pertain to those delivered for analysis. Samples will be discarded if not notified by the client within 90 days.	<b>CODES ASBESTOS</b> ND-None Detected CHRY-Chrysotile AMOS-Amosite CROC-Crocidolite TREM-Tremolite ACTN-Actinolite Anth-Anthophyllite	<b>CODES OTHER FIBERS</b> PGBL-Fibrous Glass CELL-Cellulose SYN-Synthetic WOLL-Wollastonite H-Hair O-Other (Specify)	<b>CODES MATRIX</b> G-Gypsum C-Calcium Carbonate M-Mica O-Other Matrix

ANALYZED BY - Erik Lindahl      Quality Control Technician

10/18/2022

DATE ANALYZED



TRUE NORTH  
CONSULTANTS

INDUSTRIAL HYGIENE MONITORING  
Southwind RAS Facility – Romeoville  
Route 7/Route 53  
Romeoville, Illinois 60446

Prepared for:

Southwind RAS, LLC  
2250 Southwind Boulevard  
Bartlett, IL 60103

Prepared by:

True North Consultants, Inc.  
1000 E. Warrenville Road, Ste. 140  
Naperville, IL 60563

Phone: 630.717.2880



Date: December 28, 2022

Project Number: T220151.04



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## LIST OF APPENDICES

- Appendix A     IH Survey Data Sheets
- Appendix B     Laboratory Analytical Reports



## 1.0 INTRODUCTION

### 1.1. General

True North Consultants, Inc. (True North) was retained by Southwind RAS, LLC to conduct personal exposure monitoring during asphalt shingle recycling operations performed at the Romeoville RAS Facility located near the DRP Bridge at Route 7 and Route 53 in Romeoville, Illinois (Site). Monitoring was conducted over a period of one (1) work shift on November 15, 2022, by a qualified Industrial Hygienist.

### 1.2. Purpose

The purpose of the study was to ascertain the concentrations of airborne "asbestos" fibers to which workers may be exposed in relation to the Occupational Safety and Health Administration (OSHA) Permissible Exposure Limit (PEL) and Excursion Limit (EL). The results of the study were used to assess overall compliance with applicable exposure limits and to assess the appropriate level of respiratory protection and/or additional engineering and work practice controls necessary to protect employees from hazardous concentrations of airborne contaminants.

### 1.3. Scope of Services

True North provided a qualified industrial hygienist to conduct air monitoring during asphalt shingle recycling operations where the potential for occupational exposure to the contaminants of concern exists. The scope of monitoring consisted of personal exposure monitoring for airborne "asbestos" fibers. Air monitoring was performed for each work classification where the potential for occupational exposure to contaminants of concern exists. At the completion of monitoring, collected samples were analyzed by True North's AIHA proficiency analytical testing (PAT) program participating laboratory (AIHA Laboratory No. 207438). Results of analysis have been summarized within this narrative report along with a summary of methods, findings, and conclusions.

## 2.0 METHODOLOGY

### 2.1. Sampling Methodology

Exposure monitoring was performed to evaluate the concentrations of airborne "asbestos" fibers to which workers may be exposed during asphalt shingle recycling operations. Upon arriving on site, the industrial hygienist developed a sampling plan based upon the scope of work to obtain an overall representation of employee exposure. Airborne "asbestos" fiber monitoring was conducted in accordance with National Institute for Occupational Safety and Health (NIOSH) Method 7400.

Personal exposure monitoring was performed utilizing Gillian brand low flow sampling pumps calibrated at a flow rate of 2.0 liters per minute for airborne "asbestos" fibers. Airborne "asbestos" fiber samples were collected by drawing a known volume of air through a 25mm mixed cellulose ester (MCE) filter (0.8 micron pore size). Each sampling pump was calibrated at the appropriate flow rate prior to initiating monitoring utilizing a TSI Model-4100 Primary Calibrator. The personal pumps were then attached to the workers with the sampling media placed within the workers breathing zone. Each pump was placed in operation mode at which point sample collection was initiated.





The pumps were maintained in operation for the duration of the sampling period during which time work operations were periodically observed and information regarding site conditions, work practices and engineering controls were recorded for data interpretation purposes. At the conclusion of sampling, flow rates were verified, volumes were recorded, and sampling pumps were turned off. A total of two (2) field blanks were collected with each sample set for quality control purposes. The samples were then containerized and sample information was recorded.

## 2.2. Analytical Methodology

Upon completion of sampling, airborne "asbestos" fiber samples were analyzed by True North's AIHA proficiency analytical testing (PAT) program participating laboratory (AIHA Laboratory No. 207438). Air sample analysis was performed by Phase Contrast Microscopy (PCM) utilizing NIOSH Method 7400 "A" Counting Rules. PCM analysis counts all fibers measuring greater than or equal to 5 micrometers in length, with a length to width aspect ratio of 3:1. The PCM method quantifies all type of fibers and does not specifically identify "asbestos" fibers. Because the specific content is not identified, it should be noted that identified fibers may also include particulate from sources other than asbestos including fibrous glass, paper, gypsum, rock wool, etc. Copies of laboratory analytical reports and chain-of-custody records are provided within **Appendix B** of this report.

## 3.0 FINDINGS

### 3.1. General Observations

The Site addressed during this project consists of the Southwind RAS asphalt shingle recycling operation located in Romeoville, Illinois. The work activities performed at the Site consisted of the recycling of asphalt roofing shingles for the purposes of beneficial reuse. Recyclable roofing shingles are delivered to the Site and stockpiled for sorting and processing. Work activities performed on the day of monitoring consisted of one (1) employee operating a wheel loader, performing material offloading and stockpiling work activities. The wheel loader operator would additionally write up tickets for individuals dropping off shingles and wooden scrap. The operation is typically performed on a daily basis for the duration of a standard eight-hour work shift. Work operations were performed for the duration of the work shift with the exception of scheduled breaks and time associated with material handling and staging activities. The employee operating the wheel loader was equipped with a hard hat, safety glasses, and steel-toe boots for the duration of work activities.

### 3.2. Summary of Results

Exposure monitoring was performed to assess the concentrations of airborne "asbestos" fibers generated during asphalt shingle recycling operations. Results of airborne "asbestos" fiber monitoring were reported in fibers per cubic centimeter (f/cc) of air. For each sample, The Permissible Exposure Limit (PEL) was established, and the Time-Weighted Average (TWA) was calculated. The results of analysis were then compared to the PEL in order to determine regulatory compliance and the degree of health risk to the worker. The following table summarizes the results of monitoring in relation to applicable exposure limits:

## INDUSTRIAL HYGIENE MONITORING REPORT



Table 1: Exposure Monitoring Results

Sample Description	Sample ID	Contaminant	Concentration	Exposure Limit(s)
Tomas Gonzalez – Wheel Loader Operator	EX-1115-01	Airborne Asbestos Fibers	<0.045 f/cc (EL)	1.0 f/cc (EL)
	PRS-1115-01	Airborne Asbestos Fibers	0.005 f/cc (TWA)	0.1 f/cc (PEL)

## Notes:

- (1) If concentrations of contaminants during non-monitored periods are consistent with those present during monitored periods, it is recommended that the reported concentrations be utilized in lieu of the calculated 8-hour TWA value where applicable.
- (2) Copies of laboratory analytical reports are provided in Appendix B of this report.

## 4.0 DISCUSSION

### 4.1. General

The term asbestos refers to a set of six naturally occurring fibrous silicate minerals. Due to the desirable physical and chemical properties of these minerals, asbestos minerals were commonly used in the manufacture of a wide variety of building materials including pipe insulation, spray-on fireproofing, acoustical ceiling tile, vinyl composition floor tile, drywall, and roofing materials. These “asbestiform” minerals are composed of microscopic fibrils that can become airborne if disturbed and may enter the deepest recesses of the lungs. Exposure to airborne asbestos fibers may result in serious and fatal illnesses including lung cancer, mesothelioma, and asbestosis.

Due to the toxicity of the aforementioned compound, OSHA has published occupational exposure limits for exposure to this compound including the Permissible Exposure Limit (PEL) measured as an eight-hour time weighed average (TWA), and the Excursion Limit (EL) calculated over a thirty-minute sampling period. The “Permissible Exposure Limit” represents the exposure level above which no employees may be exposed to under normal workplace conditions. The “Excursion Limit” represents the concentration of contaminants for which no worker shall be exposed for more than thirty minutes during a workday. The Eight-Hour Time-Weighted Average (8-Hour TWA) refers to the maximum average levels that an employee may be exposed to over the duration of an eight-hour shift.

### 4.2. Findings

The results of air monitoring for contaminants of concern were compared to the relevant OSHA exposure limits. Results of airborne “asbestos” fiber sampling are generally compared to the OSHA PEL of 0.1 f/cc calculated as an 8-hour TWA and the OSHA EL of 1.0 f/cc calculated over a thirty-minute sampling period.

The results of monitoring in relation to the applicable exposure limits are provided as follows:

- Airborne “asbestos” fiber concentrations for full shift personal exposure monitoring (8-hour TWA) were determined to be 0.005 fibers/cc. This result indicates exposure to be less than the OSHA PEL of 0.1 f/cc. The results of thirty-minute sampling were determined to be less than the OSHA EL of 1.0 f/cc.



## 5.0 CONCLUSIONS

Based upon the results of analysis, concentrations of airborne "asbestos" fibers were not detected above the OSHA PEL or EL. In accordance with OSHA requirements, for all workplaces where employee exposure to airborne contaminants exceeds the permissible exposure limit, the employer shall either eliminate the hazard or seek the best possible permanent solution available including the implementation of engineering and work practice controls, or administrative controls, to reduce and maintain employee exposure to or below the permissible exposure limit to the extent that such controls are feasible.

In that the results of personal exposure monitoring were determined to be less than the applicable exposure limits, it appears that existing work practices and engineering controls are sufficient to maintain occupational exposure to within acceptable limits.

For specific information regarding dates, locations, or results of monitoring, please refer to the Appendices of this report. This documentation should be maintained for a period of thirty years.

## 6.0 GENERAL REMARKS

Due to the fact that relative concentrations of contaminants may vary based upon changes in material composition, work practices, environmental conditions, and/or engineering controls, any future changes to these parameters should be evaluated to assess their overall impact on employee exposure. Should conditions change that may result in the additional generation of contaminants, additional monitoring is recommended to assess the potential impact of these changes on employee exposure.

Locations and intervals of monitoring have been determined based upon the scope of work, and/or the discretion of the client's representatives. The services performed by the environmental scientists on this project have been conducted with that level of care and skill ordinarily exercised by reputable members of the profession, practicing in the same locality, under similar budget and time constraints. No warranty is made or intended.



APPENDIX A  
IH Survey Data Sheets



Client Name: Southwind RAS, LLC

Site Name: Romeoville RAS Facility

Project Number: T220151.04

## INDUSTRIAL HYGIENE AIR SAMPLE SURVEY FORM

Site: Southwind RAS - Romeoville, Illinois

Sample Date: November 15, 2022

Location: Romeoville, Illinois

Work Activity: Shingle Stockpiling

Job Description: Personal Exposure Monitoring

Shift:	1. Day	Frequency of Operation	1. Daily	2. 2-3/wk	3. Weekly	4. 2-3/mo	Duration of Operation	1. 0-15 min	2. 15-30 min	3. 30-60 min	4. 1-2 hr
2. Eve.	3. Night		5. Monthly	6. 2-3/yr	7. Yearly	8. Special		5. 2-4 hr	6. 4-6 hr	7. 6-8 hr	8. > 8 hr

**WORK ACTIVITIES:**

The operation consisted of a wheel loader operator. The scale house/ticket writer wasn't present onsite today. Wheel loader operator work activities included generating shingle stockpiles for processing. He would also write up tickets for individuals dropping off shingles and wooden scrap.

**ENGINEERING CONTROLS:**

Work performed in an open-air environment.

**PPE DESCRIPTION:**

Hard Hat, Safety Toe Boot, Safety Glasses.

Sample #	Sample Time			Flow Rate			Sample Volume	Sample Description	Analyte
	Start	Stop	Total	Start	Stop	Avg.			
PRS-1115-01	7:35 AM	2:40 PM	425 mins	2.0 L/min	2.0 L/min	2.0 L/min	850 L	Personal – Tomas Gonzalez – Wheel Loader Operator/Ticket Writer	Airborne Asbestos Fibers
EX-1115-01	7:05 AM	7:35 AM	30 mins	2.0 L/min	2.0 L/min	2.0 L/min	60 L	Excursion – Tomas Gonzalez – Wheel Loader Operator/Ticket Writer	Airborne Asbestos Fibers

Exposure during the unsampled period is: ☒ Same as sample period ☐ Zero ☐ Other \_\_\_\_\_

**NOTES:**

True North arrived on site at 6:50 AM and met with client to discuss the day's work activities. The operation consisted of one wheel loader. Worker activities included operating the wheel loader, generating shingle stockpiles for processing, and ticket writing. Prior to beginning work activities, True North calibrated the air pump. The Pump was then affixed to the worker and sampling began at 7:00 AM. Throughout the shift, True North periodically checked the pump to ensure it was functioning properly. At the completion of the shift, the air pump was stopped, and the sample was collected. The air pump was post calibrated and sampling data recorded. True North left the site at 2:55 PM.

Sampling IH: Brittain Faville

Date Completed: 11/15/2022

\* BY MY SIGNATURE, I VERIFY THAT INFORMATION DETAILED ON THIS FORM IS COMPLETE AND ACCURATE TO THE BEST OF MY KNOWLEDGE.

Signature:

Date Signed: 11/15/2022





APPENDIX B  
Laboratory Analytical Reports

ACTIVITY	RESP. TYPE	START	STOP	TIME (MIN)	START	END	AVERAGE	(LITERS)
Field Blank	FB	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Field Blank	FB	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Wheel Loader Operator/Ticket Writer	EX	7:05 AM	7:35 AM	30	2.0	2.0	2.0	60
Wheel Loader Operator/Ticket Writer	PRS	7:35 AM	2:40 PM	425	2.0	2.0	2.0	850

00-08350)

nting Rules.

8 HOUR TIME-WEIGHTED AVERAGE				
RESP. TYPE	EMPLOYEE NAME	T1	C1	T2
N/A	Tomas Gonzalez	30	< 0.045	425

F 0001



TRUE NORTH  
CONSULTANTS

INDUSTRIAL HYGIENE MONITORING  
Southwind RAS Facility – Romeoville  
Route 7/Route 53  
Romeoville, Illinois 60446

Prepared for:

Southwind RAS, LLC  
2250 Southwind Boulevard  
Bartlett, IL 60103

Prepared by:

True North Consultants, Inc.  
1000 E. Warrenville Road, Ste. 140  
Naperville, IL 60563

Phone: 630.717.2880

Date: October 25, 2021

Project Number: T121522.04



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## LIST OF APPENDICES

Appendix A	IH Survey Data Sheets
Appendix B	Laboratory Analytical Reports



## 1.0 INTRODUCTION

### 1.1. General

True North Consultants, Inc. (True North) was retained by Southwind RAS, LLC to conduct personal exposure monitoring during asphalt shingle recycling operations performed at the Romeoville RAS Facility located near the DRP Bridge at Route 7 and Route 53 in Romeoville, Illinois (Site). Monitoring was conducted over a period of one (1) work shift on September 29, 2021 by a qualified Industrial Hygienist.

### 1.2. Purpose

The purpose of the study was to ascertain the concentrations of airborne "asbestos" fibers to which workers may be exposed in relation to the Occupational Safety and Health Administration (OSHA) Permissible Exposure Limit (PEL) and Excursion Limit (EL). The results of the study were used to assess overall compliance with applicable exposure limits and to assess the appropriate level of respiratory protection and/or additional engineering and work practice controls necessary to protect employees from hazardous concentrations of airborne contaminants.

### 1.3. Scope of Services

True North provided a qualified industrial hygienist to conduct air monitoring during asphalt shingle recycling operations where the potential for occupational exposure to the contaminants of concern exists. The scope of monitoring consisted of personal exposure monitoring for airborne "asbestos" fibers. Air monitoring was performed for each work classification where the potential for occupational exposure to contaminants of concern exists. At the completion of monitoring, collected samples were analyzed by True North's AIHA proficiency analytical testing (PAT) program participating laboratory (AIHA Laboratory No. 207438). Results of analysis have been summarized within this narrative report along with a summary of methods, findings, and conclusions.

## 2.0 METHODOLOGY

### 2.1. Sampling Methodology

Exposure monitoring was performed to evaluate the concentrations of airborne "asbestos" fibers to which workers may be exposed during asphalt shingle recycling operations. Upon arriving on site, the industrial hygienist developed a sampling plan based upon the scope of work to obtain an overall representation of employee exposure. Airborne "asbestos" fiber monitoring was conducted in accordance with National Institute for Occupational Safety and Health (NIOSH) Method 7400.

Personal exposure monitoring was performed utilizing Gillian brand low flow sampling pumps calibrated at a flow rate of 2.0 liters per minute for airborne "asbestos" fibers. Airborne "asbestos" fiber samples were collected by drawing a known volume of air through a 25mm mixed cellulose ester (MCE) filter (0.8 micron pore size). Each sampling pump was calibrated at the appropriate flow rate prior to initiating monitoring utilizing a TSI Model-4100 Primary Calibrator. The personal pumps were then attached to the workers with the sampling media placed within the workers breathing zone. Each pump was placed in operation mode at which point sample collection was initiated.





The pumps were maintained in operation for the duration of the sampling period during which time work operations were periodically observed and information regarding site conditions, work practices and engineering controls were recorded for data interpretation purposes. At the conclusion of sampling, flow rates were verified, volumes were recorded, and sampling pumps were turned off. A total of two (2) field blanks were collected with each sample set for quality control purposes. The samples were then containerized and sample information was recorded.

## 2.2. Analytical Methodology

Upon completion of sampling, airborne “asbestos” fiber samples were analyzed by True North’s AIHA proficiency analytical testing (PAT) program participating laboratory (AIHA Laboratory No. 207438). Air sample analysis was performed by Phase Contrast Microscopy (PCM) utilizing NIOSH Method 7400 “A” Counting Rules. PCM analysis counts all fibers measuring greater than or equal to 5 micrometers in length, with a length to width aspect ratio of 3:1. The PCM method quantifies all type of fibers and does not specifically identify “asbestos” fibers. Because the specific content is not identified, it should be noted that identified fibers may also include particulate from sources other than asbestos including fibrous glass, paper, gypsum, rock wool, etc. Copies of laboratory analytical reports and chain-of-custody records are provided within **Appendix B** of this report.

## 3.0 FINDINGS

### 3.1. General Observations

The Site addressed during this project consists of the Southwind RAS asphalt shingle recycling operation located in Romeoville, Illinois. The work activities performed at the Site consisted of the recycling of asphalt roofing shingles for the purposes of beneficial reuse. Recyclable roofing shingles are delivered to the Site and stockpiled for sorting and processing. Work activities performed on the day of monitoring consisted of one (1) employee operating a wheel loader, performing material offloading and stockpiling work activities, and one (1) employee performing truck weighing and ticketing activities. The operation is typically performed on a daily basis for the duration of a standard eight-hour work shift. Work operations were performed for the duration of the work shift with the exception of scheduled breaks and time associated with material handling and staging activities. The employee operating the wheel loader was equipped with a hard hat, safety glasses, and steel-toe boots for the duration of work activities.

### 3.2. Summary of Results

Exposure monitoring was performed to assess the concentrations of airborne “asbestos” fibers generated during asphalt shingle recycling operations. Results of airborne “asbestos” fiber monitoring were reported in fibers per cubic centimeter (f/cc) of air. For each sample, The Permissible Exposure Limit (PEL) was established, and the Time-Weighted Average (TWA) was calculated. The results of analysis were then compared to the PEL in order to determine regulatory compliance and the degree of health risk to the worker. The following table summarizes the results of monitoring in relation to applicable exposure limits:



Table 1: Exposure Monitoring Results

Sample Description	Sample ID	Contaminant	Concentration	Exposure Limit(s)
Ernesto Avalos – Wheel Loader Operator	GJ0929-3	Airborne Asbestos Fibers	< 0.045 f/cc (EL)	1.0 f/cc (EL)
	GJ0929-4	Airborne Asbestos Fibers	0.006 f/cc (TWA)	0.1 f/cc (PEL)
Consuelo Manducano – Ticket Writer	GJ0929-5	Airborne Asbestos Fibers	< 0.045 f/cc (EL)	1.0 f/cc (EL)
	GJ0929-6	Airborne Asbestos Fibers	< 0.003 f/cc (TWA)	0.1 f/cc (PEL)

*Notes:*

- (1) If concentrations of contaminants during non-monitored periods are consistent with those present during monitored periods, it is recommended that the reported concentrations be utilized in lieu of the calculated 8-hour TWA value where applicable.
- (2) Copies of laboratory analytical reports are provided in Appendix B of this report.

## 4.0 DISCUSSION

### 4.1. General

The term asbestos refers to a set of six naturally occurring fibrous silicate minerals. Due to the desirable physical and chemical properties of these minerals, asbestos minerals were commonly used in the manufacture of a wide variety of building materials including pipe insulation, spray-on fireproofing, acoustical ceiling tile, vinyl composition floor tile, drywall, and roofing materials. These "asbestiform" minerals are composed of microscopic fibrils that can become airborne if disturbed and may enter the deepest recesses of the lungs. Exposure to airborne asbestos fibers may result in serious and fatal illnesses including lung cancer, mesothelioma, and asbestosis.

Due to the toxicity of the aforementioned compound, OSHA has published occupational exposure limits for exposure to this compound including the Permissible Exposure Limit (PEL) measured as an eight-hour time weighed average (TWA), and the Excursion Limit (EL) calculated over a thirty-minute sampling period. The "Permissible Exposure Limit" represents the exposure level above which no employees may be exposed to under normal workplace conditions. The "Excursion Limit" represents the concentration of contaminants for which no worker shall be exposed for more than thirty minutes during a workday. The Eight-Hour Time-Weighted Average (8-Hour TWA) refers to the maximum average levels that an employee may be exposed to over the duration of an eight-hour shift.

### 4.2. Findings

The results of air monitoring for contaminants of concern were compared to the relevant OSHA exposure limits. Results of airborne "asbestos" fiber sampling are generally compared to the OSHA PEL of 0.1 f/cc calculated as an 8-hour TWA and the OSHA EL of 1.0 f/cc calculated over a thirty-minute sampling period.

The results of monitoring in relation to the applicable exposure limits are provided as follows:

- Airborne "asbestos" fiber concentrations for full shift personal exposure monitoring (8-hour TWA) were determined to range from < 0.003 f/cc to 0.006 f/cc. This result indicates exposure to be less



than the OSHA PEL of 0.1 f/cc. The results of thirty-minute sampling were determined to be less than the OSHA EL of 1.0 f/cc.

## 5.0 CONCLUSIONS

Based upon the results of analysis, concentrations of airborne "asbestos" fibers were not detected above the OSHA PEL or EL. In accordance with OSHA requirements, for all workplaces where employee exposure to airborne contaminants exceeds the permissible exposure limit, the employer shall either eliminate the hazard or seek the best possible permanent solution available including the implementation of engineering and work practice controls, or administrative controls, to reduce and maintain employee exposure to or below the permissible exposure limit to the extent that such controls are feasible.

In that the results of personal exposure monitoring were determined to be less than the applicable exposure limits, it appears that existing work practices and engineering controls are sufficient to maintain occupational exposure to within acceptable limits.

For specific information regarding dates, locations, or results of monitoring, please refer to the Appendices of this report. This documentation should be maintained for a period of thirty years.

## 6.0 GENERAL REMARKS

Due to the fact that relative concentrations of contaminants may vary based upon changes in material composition, work practices, environmental conditions, and/or engineering controls, any future changes to these parameters should be evaluated to assess their overall impact on employee exposure. Should conditions change that may result in the additional generation of contaminants, additional monitoring is recommended to assess the potential impact of these changes on employee exposure.

Locations and intervals of monitoring have been determined based upon the scope of work, and/or the discretion of the client's representatives. The services performed by the environmental scientists on this project have been conducted with that level of care and skill ordinarily exercised by reputable members of the profession, practicing in the same locality, under similar budget and time constraints. No warranty is made or intended.



APPENDIX A  
IH Survey Data Sheets



Client Name: Southwind RAS, LLC

Site Name: Romeoville RAS Facility

Project Number: T121522.04

## INDUSTRIAL HYGIENE SURVEY DATA SHEET

Site: Southwind RAS - Romeoville, Illinois

Sample Date: September 29, 2021

Location: Route 7 / Route 53, Romeoville, Illinois

Work Activity: Shingle Stockpiling &amp; Ticket Writing

Job Description: Personal Exposure Monitoring

Shift:	1. Day	Frequency of Operation	1. Daily	2. 2-3/wk	3. Weekly	4. 2-3/mo	Duration of Operation	1. 0-15 min	2. 15-30 min	3. 30-60 min	4. 1-2 hr
2. Eve.	3. Night		5. Monthly	6. 2-3/yr	7. Yearly	8. Special		5. 2-4 hr	6. 4-6 hr	7. 6-8 hr	8. > 8 hr

**WORK ACTIVITIES:**

The operation consisted of one (1) wheel loader operator and one (1) ticket writer. The operator was operating an end loader and a bulldozer. Operator work activities included generating shingle stockpiles for processing along with various other materials. The ticket writer remained in the entrance trailer for the entirety of the shift weighing and checking in and out trucks carrying various materials.

**ENGINEERING CONTROLS:**

Work performed in an open-air environment.

**PPE DESCRIPTION:**

Hard Hat, Safety Toe Boot, Safety Glasses.

Sample #	Sample Time			Flow Rate			Sample Volume	Sample Description	Analyte
	Start	Stop	Total	Start	Stop	Avg.			
GJ0929-03	6:51 AM	7:21 AM	30 mins	2.0 L/min	2.0 L/min	2.0 L/min	60 L	Excursion – Ernesto Avalos – Wheel Loader Operator	Airborne Asbestos Fibers
GJ0929-04	7:21 AM	2:43 PM	442 mins	2.0 L/min	2.0 L/min	2.0 L/min	884 L	Personal – Ernesto Avalos – Wheel Loader Operator	Airborne Asbestos Fibers
GJ0929-05	6:50 AM	7:20 AM	30 mins	2.0 L/min	2.0 L/min	2.0 L/min	60 L	Excursion – Consuelo Manducano – Ticket Writer	Airborne Asbestos Fibers
GJ0929-06	7:20 AM	2:40 PM	440 mins	2.0 L/min	2.0 L/min	2.0 L/min	880 L	Personal – Consuelo Manducano – Ticket Writer	Airborne Asbestos Fibers

Exposure during the unsampled period is: ☒ Same as sample period ☐ Zero ☐ Other

**NOTES:**

True North arrived on site at 6:45 AM and met with client to discuss the day's work activities. The operation consisted of one (1) production operator and one (1) ticket writer. Prior to beginning work activities, True North calibrated all air pumps. Pumps were then affixed to each worker and sampling began at 6:51 AM. Throughout the shift, True North periodically checked the pumps to ensure they were functioning properly. At the completion of the shift, air pumps were stopped, and samples were collected. All air pumps were post calibrated and sampling data was recorded. True North left the site at 2:50 PM.

Sampling IH: Greg Jones

Date Completed: 9/29/2021

\* BY MY SIGNATURE, I VERIFY THAT INFORMATION DETAILED ON THIS FORM IS COMPLETE AND ACCURATE TO THE BEST OF MY KNOWLEDGE.

Signature:

Date Signed: 9/29/2021





APPENDIX B  
Laboratory Analytical Reports

## AIR SAMPLING DATA SHEET PHASE CONTRAST MICROSCOPY (PCM)

**CLIENT:** Southwind RAS, LLC  
**SITE NAME:** Southwind RAS, LLC - Romeoville, IL  
**PROJECT NAME:** Industrial Hygiene Monitoring

**DATE:** 9/29/2021  
**PROJECT No:** T121522.04  
**DAY/SHIFT:** 1/1

**SAMPLED BY:** Greg Jones  
**ANALYZED BY:** Greg Jones  
**ANALYZED AT:** Laboratory

Magnification	400	0.00785	Field Area
Fld. Diameter	100 um	0.2	C.V.
Phase Test	X	385	EFA

SAMPLE NUMBER	SAMPLE DESCRIPTION		SAMPLE TYPE	TIME		TOTAL TIME (MIN)	FLOW RATE (LITERS PER MIN)			SAMPLE VOLUME (LITERS)	FIBERS	FIELDS	FIBERS / MM <sup>2</sup>	FIBERS / CC
	ACTIVITY	SAMPLE LOCATION AND/OR EMPLOYEE NAME DESCRIPTION OF WORK ACTIVITY		START	STOP		START	END	AVERAGE					
BLNK-01	N/A	Field Blank	FB	N/A	N/A	N/A	N/A	N/A	N/A	N/A	< 5.5	100	< 7.0	N/A
BLNK-02	N/A	Field Blank	FB	N/A	N/A	N/A	N/A	N/A	N/A	N/A	< 5.5	100	< 7.0	N/A
GJ0929-3	N/A	Ernst Avalos -Wheel Loader Operator	EX	6:51 AM	7:21 AM	30	2.0	2.0	2.0	60	< 5.5	100	< 7.0	< 0.045
GJ0929-4	N/A	Ernst Avalos -Wheel Loader Operator	PRS	7:21 AM	2:43 PM	442	2.0	2.0	2.0	884	11	100	14.0	0.006
GJ0929-5	N/A	Consuelo Manduano - Ticket Writer	EX	6:50 AM	7:20 AM	30	2.0	2.0	2.0	60	< 5.5	100	< 7.0	< 0.045
GJ0929-6	N/A	Consuelo Manduano - Ticket Writer	PRS	7:20 AM	2:40 PM	440	2.0	2.0	2.0	880	< 5.5	100	< 7.0	< 0.003

**Analyst:** Greg Jones (IDPH No. 100-08350)

- 1). PCM Air Samples are Analyzed by NIOSH Method 7400 "A" Counting Rules.
- 2). The Limit of Detection is 7.0 f/mm<sup>2</sup> (<LOD=Less than the Limit of Detection).
- 3). The OSHA PEL is 0.1 f/cc and the excursion limit is 1.0 f/cc.
- 4). The required Clearance Level is 0.01 f/cc in the State of Illinois.
- 5). The EPA recommended Clearance Level is 0.01 f/cc.

8 HOUR TIME-WEIGHTED AVERAGE								
RESP. TYPE	EMPLOYEE NAME	T1	C1	T2	C2	T3	C3	TWA (f/cc)
N/A	Ernst Avalos	30	< 0.045	442	0.006			< 0.008
N/A	Consuelo Manduano	30	< 0.045	440	< 0.003			< 0.006

**ACTIVITY**  
PREP - Site Preparation  
REM - Gross Removal  
GLBG - Glovebag Removal  
CLN - Cleaning  
O&M - Patch & Repair  
NF - Non-Friable Removal

**SAMPLE TYPE**  
BK - Background  
PRS - Personal  
EX - Excursion  
CL - Clearance  
ENV - Environmental  
IC - Inside Containment  
OC - Outside Containment  
FB - Field Blank

**RESPIRATOR TYPE**  
APR - Air Purifying Respirator  
PAPR - Powered Air Purifying Respirator  
SA - Supplied Air  
N/A - None



R 000152  
1000 East Warrenville Road, Suite 140  
Naperville, IL 60563  
O: 630.717.2880  
F: 630.689.5881  
ConsultTrueNorth.com

November 18, 2020

Mr. Josh Quinn  
Southwind RAS, LLC  
2250 Southwind Boulevard  
Bartlett, IL 60103

**RE: Industrial Hygiene Monitoring Report  
Asphalt Shingle Recycling Operations  
Romeoville RAS Facility – Romeoville, Illinois  
True North Project No. TI20448-4**

Dear Mr. Quinn:

True North Consultants, Inc. (True North) was retained by Southwind RAS, LLC to conduct personal exposure monitoring during asphalt shingle recycling operations performed at the Romeoville RAS Facility located in Romeoville, Illinois. Services were provided by a qualified industrial hygienist on October 12, 2020.

The purpose of the study was to ascertain the concentrations of airborne “asbestos” fibers, respirable crystalline silica (RCS) and respirable dust to which workers may be exposed in relation to applicable Occupational Safety and Health Administration (OSHA) Permissible Exposure Limits (PELs), Action Levels (ALs) and Excursion Limits (ELs). **Based upon the results of analysis, concentrations of airborne fibers, RCS and respirable dust were not detected above applicable PELs or ALs calculated as an eight-hour time-weighted average (TWA) or the EL for airborne “asbestos” fibers calculated over a thirty-minute sampling period.**

Enclosed with this cover letter is a report detailing sampling procedures, results of monitoring, interpretations, and recommendations. For specific information regarding, dates, locations, or results of monitoring, please refer to Appendices of this report.

It has been a pleasure being of service to Southwind RAS, LLC. Should you have any questions regarding this project, please feel free to contact me at your convenience.

Respectfully Submitted,

**TRUE NORTH CONSULTANTS**

A handwritten signature in dark ink, appearing to read "B. S. Mihelich".

Brian S. Mihelich

Executive Vice President

# Industrial Hygiene Monitoring Report

## Asphalt Shingle Recycling Operations

Romeoville RAS Facility  
Romeoville, IL

PREPARED FOR

**Southwind RAS, LLC**

2250 Southwind Boulevard  
Bartlett, Illinois 60103

PREPARED BY

**True North Consultants, Inc.**

1000 E. Warrenville Road, Suite 140  
Naperville, Illinois 60563

SUBMITTED ON

November 18, 2020

PROJECT NUMBER

TI20448-4





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## **I.0 INTRODUCTION**

### **I.1 General**

True North Consultants, Inc. (True North) was retained by Southwind RAS, LLC (Client) to conduct personal exposure monitoring during asphalt shingle recycling operations performed at the Romeoville RAS Facility located in Romeoville, Illinois (Site). Monitoring was conducted over a period of one (1) work shift on October 12, 2020 by a qualified Industrial Hygienist.

### **I.2 Purpose**

The purpose of the study was to ascertain the concentrations of airborne “asbestos” fibers, respirable crystalline silica (RCS) and respirable dust to which workers may be exposed in relation to applicable Occupational Safety and Health Administration (OSHA) Permissible Exposure Limits (PELs), Action Levels (ALs) and Excursion Limits (ELs). The results of the study were used to assess overall compliance with applicable exposure limits and to assess the appropriate level of respiratory protection and/or additional engineering and work practice controls necessary to protect employees from hazardous concentrations of airborne contaminants.

### **I.3 Scope of Services**

True North provided a qualified industrial hygienist to conduct air monitoring during asphalt shingle recycling operations where the potential for occupational exposure to the contaminants of concern exists. The scope of monitoring consisted of personal exposure monitoring for airborne “asbestos” fibers, respirable crystalline silica (RCS) and respirable dust. Air monitoring was performed for each work classification where the potential for occupational exposure to contaminants of concern exists. At the completion of monitoring, collected samples were submitted to an American Industrial Hygiene Association (AIHA) accredited laboratory for analysis. Results of analysis have been summarized within this narrative report along with a summary of methods, findings, and conclusions.

## **2.0 METHODOLOGY**

### **2.1 Sampling Methodology**

Exposure monitoring was performed to evaluate the concentrations of airborne “asbestos” fibers, respirable crystalline silica (RCS) and respirable dust to which workers may be exposed during asphalt shingle recycling operations. Upon arriving on site, the industrial hygienist developed a sampling plan based upon the scope of work to obtain an overall representation of employee



exposure. Airborne “asbestos” fiber monitoring was conducted in accordance with National Institute for Occupational Safety and Health (NIOSH) Method 7400. RCS exposure monitoring was conducted in accordance with modified NIOSH Method 7500 / OSHA ID-142. Respirable dust monitoring was conducted in accordance with modified NIOSH Method 0600.

Personal exposure monitoring was performed utilizing Gillian brand low flow sampling pumps calibrated at a flow rate of 2.0 liters per minute for airborne “asbestos” fibers and 2.5 liters per minute for RCS and respirable dust. Airborne “asbestos” fiber samples were collected by drawing a known volume of air through a 25mm mixed cellulose ester (MCE) filter (0.8 micron pore size). RCS and respirable dust samples were collected by drawing a known volume of air through a pre-weighed 37mm polyvinyl chloride (PVC) filter (5.0-um pore size) placed in a three-piece cassette. RCS and respirable dust monitoring was performed using an in-line SKC brand aluminum cyclone assembly to filter out the non-respirable portion of the dust. Each sampling pump was calibrated at the appropriate flow rate prior to initiating monitoring utilizing a TSI Model-4100 Primary Calibrator. The personal pumps were then attached to the workers with the sampling media placed within the workers breathing zone. Each pump was placed in operation mode at which point sample collection was initiated.

The pumps were maintained in operation for the duration of the sampling period during which time work operations were periodically observed and information regarding site conditions, work practices and engineering controls was recorded for data interpretation purposes. At the conclusion of sampling, flow rates were verified, volumes were recorded, and sampling pumps were turned off. A total of two (2) field blanks were collected with each sample set for quality control purposes. The samples were then containerized and sample information was recorded utilizing strict chain-of-custody procedures prior to submittal for analysis.

## 2.2 Analytical Methodology

Upon completion of sampling, RCS and respirable dust air samples were submitted to an American Industrial Hygiene Association (AIHA) accredited laboratory for analysis. Respirable dust samples were analyzed utilizing gravimetric analysis (filter weight) in accordance with modified NIOSH Method 0600. Each respirable dust sample was also analyzed for silica components (quartz, cristobalite and tridymite) utilizing X-Ray Power Diffraction (XRD) in accordance with OSHA Method ID-142.

Airborne “asbestos” fiber samples were analyzed by True North’s AIHA proficiency analytical testing (PAT) program participating laboratory (AIHA Laboratory No. 207438). Air sample analysis was performed by Phase Contrast Microscopy (PCM) utilizing NIOSH Method 7400 “A” Counting Rules. PCM analysis counts all fibers measuring greater than or equal to 5 micrometers in length, with a length to width aspect ratio of 3:1. The PCM method quantifies all type of fibers and does not specifically identify “asbestos” fibers. Because the specific content is not identified, it should be noted that identified fibers may also include particulate from



sources other than asbestos including fibrous glass, paper, gypsum, rock wool, etc. Copies of laboratory analytical reports and chain-of-custody records are provided within Appendix B of this report.

### 3.0 FINDINGS

#### 3.1 General Observations

The Site addressed during this project consists of the Southwind RAS asphalt shingle recycling operation located in Romeoville, Illinois. The work activities performed at the Site consisted of the recycling of asphalt roofing shingles for the purposes of beneficial reuse. Recyclable roofing shingles are delivered to the Site and stockpiled for sorting and processing. Work activities performed on the day of monitoring consisted of one (1) employee operating a wheel loader performing material offloading and stockpiling work activities, and one (1) employee performing truck ticketing activities within the entrance trailer. The operation is typically performed on a daily basis for the duration of a standard eight-hour work shift. Work operations were performed for the duration of the work shift with the exception of scheduled breaks and time associated with material handling and staging activities. The workers performing the work activities were equipped with hard hats, safety glasses and steel toe boots for the duration of work activities.

#### 3.1 Summary of Results

Exposure monitoring was performed to assess the concentrations of airborne “asbestos” fibers, RCS and respirable dust generated during asphalt shingle recycling operations. Results of airborne “asbestos” fiber monitoring were reported in fibers per cubic centimeter (f/cc) of air. Results of RCS analysis were reported in micrograms per cubic meter ( $\mu\text{g}/\text{m}^3$ ) of air. Results of respirable dust analysis and total dust analysis were reported in milligrams per cubic meter ( $\text{mg}/\text{m}^3$ ) of air. For each sample, the Permissible Exposure Limits (PELs) were established and the Time-Weighted Average (TWA) was calculated. The results of analysis were then compared to the respective PELs in order to determine regulatory compliance and the degree of health risk to the worker. The following table summarizes the results of monitoring in relation to applicable exposure limits:

Table 1: Exposure Monitoring Results				
Sample Description	Sample ID	Contaminant	Concentration	Exposure Limit(s)
Personal - Consuelo Manduano – Scale Clerk/Ticket Writer	EX-1012-01	Airborne Asbestos Fibers	< 0.045 f/cc (EL)	1.0 f/cc (EL)
	PRS-1012-01	Airborne Asbestos Fibers	0.006 f/cc (TWA)	0.1 f/cc (PEL)
	RDS-1012-01	Respirable Crystalline Silica	< 4.5 $\mu\text{g}/\text{m}^3$	50 $\mu\text{g}/\text{m}^3$ (PEL) 25 $\mu\text{g}/\text{m}^3$ (AL)



Table 1: Exposure Monitoring Results

Sample Description	Sample ID	Contaminant	Concentration	Exposure Limit(s)
		Respirable Dust	< 0.045 mg/m <sup>3</sup>	5 mg/m <sup>3</sup> (PEL)
Personal - Ernesto Avalos – Wheel Loader Operator	EX-1012-02	Airborne Asbestos Fibers	< 0.045 f/cc (EL)	1.0 f/cc (EL)
	PRS-1012-02	Airborne Asbestos Fibers	0.006 f/cc (TWA)	0.1 f/cc (PEL)
	RDS-1012-02	Respirable Crystalline Silica	< 4.5 µg/m <sup>3</sup>	50 µg/m <sup>3</sup> (PEL) 25 µg/m <sup>3</sup> (AL)
		Respirable Dust	< 0.045 mg/m <sup>3</sup>	5 mg/m <sup>3</sup> (PEL)

## Notes:

- (1) If concentrations of contaminants during non-monitored periods are consistent with those present during monitored periods, it is recommended that the reported concentrations be utilized in lieu of the calculated 8-hour TWA value where applicable.
- (2) Copies of laboratory analytical reports are provided in Appendix B of this report.

## 4.0 DISCUSSION

### 4.1 General

The term asbestos refers to a set of six naturally occurring fibrous silicate minerals. Due to the desirable physical and chemical properties of these minerals, asbestos minerals were commonly used in the manufacture of a wide variety of building materials including pipe insulation, spray-on fireproofing, acoustical ceiling tile, vinyl composition floor tile, drywall, and roofing materials. These “asbestiform” minerals are composed of tiny microscopic fibrils that can become airborne if disturbed and may enter the deepest recesses of the lungs. Exposure to airborne asbestos fibers may result in serious and fatal illnesses including lung cancer, mesothelioma and asbestosis.

Crystalline silica is a general category of minerals which includes quartz, cristobalite, and tridymite. Respirable crystalline silica (RCS) is the respirable dust fraction of crystalline silica which enters the body by inhalation. It is commonly found in construction products, concrete products, paints, coating, and many other processes. Silica dust is hazardous when very small particles are inhaled. These respirable dust particles can penetrate deep into the lungs and cause disabling and sometimes fatal lung diseases, including silicosis and lung cancer, as well as kidney disease.

Respirable Dust (also known as nuisance dusts) refers to the fraction of airborne particulate which enters the nose and mouth during breathing and may be deposited in the smallest, non-ciliated airways of the lungs (gas exchange region). Chronic exposure to nuisance dusts may result in conditions ranging from pulmonary irritation to more serious conditions depending upon the chemical composition of the dust. The particle size of respirable dust is generally defined of particles with a size of less than 10 microns.



Due to the toxicity of the aforementioned compounds, OSHA has published various occupational exposure limits for exposure to these compounds including Permissible Exposure Limit (PELs) and Action Levels (ALs) measured as an eight-hour time weighed average (TWA), and the Excursion Limit (EL) calculated over a thirty-minute sampling period. The “Permissible Exposure Limit” represents the exposure level above which no employees may be exposed to under normal workplace conditions. The “Action Level” represents the exposure level at which certain elements of the subject standards take effect. The “Excursion Limit” represents the concentration of contaminants for which no worker shall be exposed for more than thirty minutes during a workday. The Eight-Hour Time-Weighted Average (8-Hour TWA) refers to the maximum average levels that an employee may be exposed to over the duration of an eight-hour shift.

## 4.2 Findings

The results of air monitoring for contaminants of concern were compared to the relevant OSHA exposure limits. Results of airborne “asbestos” fiber sampling are generally compared to the OSHA PEL of 0.1 f/cc calculated as an 8-hour TWA and the OSHA EL of 1.0 f/cc calculated over a thirty-minute sampling period. Results of respirable crystalline silica dust sampling are generally compared to the OSHA PEL of 50  $\mu\text{g}/\text{m}^3$  calculated as an 8-hour TWA and the OSHA AL of 25  $\mu\text{g}/\text{m}^3$ . Results of respirable dust sampling are generally compared to the OSHA PEL of 5  $\text{mg}/\text{m}^3$  calculated as an 8-Hour TWA.

The results of monitoring in relation to the applicable exposure limits are provided as follows:

- Airborne “asbestos” fiber concentrations for full shift personal exposure monitoring (8-hour TWA) were determined to be < 0.006 f/cc. This result indicates exposure to be less than the OSHA PEL of 0.1 f/cc. The results of thirty-minute sampling were determined to be less than the OSHA EL of 1.0 f/cc.
- RCS concentrations for full shift personal exposure monitoring was determined to be < 4.5  $\mu\text{g}/\text{m}^3$ . The results of analysis indicate exposures to be less than the OSHA PEL of 50  $\mu\text{g}/\text{m}^3$  and less than the Action Level of 25  $\mu\text{g}/\text{m}^3$ .
- Respirable dust concentrations for full shift personal exposure monitoring were determined to be < 0.045  $\text{mg}/\text{m}^3$ . The results of analysis indicate exposures to be less than the OSHA PEL of 5  $\text{mg}/\text{m}^3$ .





## 5.0 CONCLUSIONS

Based upon the results of analysis, concentrations of airborne “asbestos” fibers, RCS and respirable dust were not detected above their respective OSHA PELs, ALs or ELs. In accordance with OSHA requirements, for all work places where employee exposure to airborne contaminants exceeds the permissible exposure limit and/or action level, the employer shall either eliminate the hazard or seek the best possible permanent solution available including the implementation of engineering and work practice controls, or administrative controls, to reduce and maintain employee exposure to or below the permissible exposure limit to the extent that such controls are feasible.

The *Respirable Crystalline Silica Standard* for the Construction Industry as specified in 29 CFR 1926.1153 requires that employers must use engineering controls and work practices as the primary way to keep exposures at or below the PEL including wetting down work operations, utilizing local exhaust ventilation and enclosing work operations. Additional requirements of the standard include the provision of respirators when engineering controls cannot adequately limit exposure; limiting worker access to high exposure areas; developing a written exposure control plan; offering medical exams to highly exposed workers; and training workers on silica risks and how to limit exposures. The standard also specifies the frequency of exposure monitoring based upon the nature of the work operation and the results of employee exposure monitoring.

In that the results of personal exposure monitoring were determined to be less than the applicable exposure limits, it appears that existing work practices and engineering controls are sufficient to maintain occupational exposure to within acceptable limits.

For specific information regarding dates, locations, or results of monitoring, please refer to the Appendices of this report. This documentation should be maintained for a period of thirty years.

## 6.0 GENERAL REMARKS

Due to the fact that relative concentrations of contaminants may vary based upon changes in material composition, work practices, environmental conditions, and/or engineering controls, any future changes to these parameters should be evaluated to assess their overall impact on employee exposure. Should conditions change that may result in the additional generation of contaminants, additional monitoring is recommended to assess the potential impact of these changes on employee exposure.

Locations and intervals of monitoring have been determined based upon the scope of work, and/or the discretion of the client's representatives. The services performed by the environmental scientists on this project have been conducted with that level of care and skill



ordinarily exercised by reputable members of the profession, practicing in the same locality, under similar budget and time constraints. No warranty is made or intended.



## APPENDIX A

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IH Survey Data Sheets



Client Name: Southwind RAS, LLC

Site Name: Romeoville RAS Facility

Project Number: T120448-4

## INDUSTRIAL HYGIENE AIR SAMPLE SURVEY FORM

Site: Southwind RAS - Romeoville, Illinois

Sample Date: October 12, 2020

Location: Romeoville, Illinois

Work Activity: Shingle Stockpiling &amp; Ticketing

Job Description: Personal Exposure Monitoring

Shift:	1. Day	Frequency of Operation	1. Daily	2. 2-3/wk	3. Weekly	4. 2-3/mo	Duration of Operation	1. 0-15 min	2. 15-30 min	3. 30-60 min	4. 1-2 hr
2. Eve.	3. Night		5. Monthly	6. 2-3/yr	7. Yearly	8. Special		5. 2-4 hr	6. 4-6 hr	7. 6-8 hr	8. > 8 hr

**WORK ACTIVITIES:**

The operation consisted of a wheel loader operator and scale house inspector. Wheel loader operator work activities included generating shingle stockpiles for processing. The scale house inspector remained in the entrance trailer for the entirety of the shift inspecting weights for trucks carrying shingles and various materials.

**ENGINEERING CONTROLS:**

Work performed in an open-air environment.

**PPE DESCRIPTION:**

Hard Hat, Safety Toe Boot, Safety Glasses.

Sample #	Sample Time			Flow Rate			Sample Volume	Sample Description	Analyte
	Start	Stop	Total	Start	Stop	Avg.			
ABS-1012-1	7:28 AM	7:58 AM	30 mins	2.0 L/min	2.0 L/min	2.0 L/min	60 L	Excursion – Consuelo Manduano – Scale Clerk/Ticket Writer	Asbestos
ABS-1012-2	7:58 AM	2:48 PM	410 mins	2.0 L/min	2.0 L/min	2.0 L/min	820 L	Personal – Consuelo Manduano – Scale Clerk/Ticket Writer	Asbestos
ABS-1012-3	7:33 AM	8:03 AM	30 mins	2.0 L/min	2.0 L/min	2.0 L/min	60 L	Excursion – Ernesto Avalos – Wheel Loader Operator	Asbestos
ABS-1012-4	8:03 AM	2:53 PM	410 mins	2.0 L/min	2.0 L/min	2.0 L/min	820 L	Personal – Ernesto Avalos – Wheel Loader Operator	Asbestos
RDS-1012-01	7:28 AM	2:48 PM	440 mins	2.5 L/min	2.5 L/min	2.5 L/min	1,100 L	Personal – Consuelo Manduano – Scale House Inspector	Respirable Crystalline Silica and Respirable Dust
RDS-1012-02	7:33 AM	2:53 PM	440 mins	2.5 L/min	2.5 L/min	2.5 L/min	1,100 L	Personal – Ernesto Avalos – Wheel Loader Operator	Respirable Crystalline Silica and Respirable Dust

Exposure during the unsampled period is: ☒ Same as sample period ☐ Zero ☐ Other \_\_\_\_\_

True North arrived on site at 7:00 AM and met with client to discuss the day's work activities. The operation consisted of one wheel loader operator and one scale house inspector. The operator operated only the wheel loader. Operator work activities included generating shingle stockpiles for processing. The scale house inspector remained in the entrance trailer for the entirety of the shift checking in and out trucks carrying roof shingles and various materials. Prior to beginning work activities, True North calibrated all air pumps. Pumps were then affixed to each worker and sampling began at 7:30 AM. Throughout the shift, True North periodically checked the pumps to ensure they were functioning properly. At the completion of the shift, air pumps were stopped and samples were collected. All air pumps were post calibrated and sampling data was recorded. True North left the site at 3:00 PM.

Sampling IH: Sam Bass

Date Completed: 10/12/2020

\* BY MY SIGNATURE, I VERIFY THAT INFORMATION DETAILED ON THIS FORM IS COMPLETE AND ACCURATE TO THE BEST OF MY KNOWLEDGE.

Signature:

Date Signed: 10/12/2020



## APPENDIX B

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### Laboratory Analytical Reports



## AIR SAMPLING DATA SHEET PHASE CONTRAST MICROSCOPY (PCM)

**CLIENT:** Southwind RAS, LLC  
**SITE NAME:** Southwind RAS, LLC - Romeoville, IL  
**PROJECT NAME:** Personal Exposure Monitoring

**DATE:** 10/12/20  
**PROJECT No:** T120448-4  
**DAY/SHIFT:** 1/1

**SAMPLED BY:** Roy W. Bass Jr.  
**ANALYZED BY:** Roy W. Bass Jr.  
**ANALYZED AT:** Laboratory

Magnification	400	0.00785	Field Area
Fld. Diameter	100 um	0.2	C.V.
Phase Test	X	385	EFA

SAMPLE NUMBER	SAMPLE DESCRIPTION		SAMPLE TYPE	TIME		TOTAL TIME (MIN.)	FLOW RATE (LITERS PER MIN.)			SAMPLE VOLUME (LITERS)	FIBERS	FIELDS	FIBERS / MM <sup>2</sup>	FIBERS / CC
	ACTIVITY	SAMPLE LOCATION AND/OR EMPLOYEE NAME, DESCRIPTION OF WORK Activity		START	STOP		START	END	AVERAGE					
BLNK-01	N/A	Field Blank	FB	N/A	N/A	N/A	N/A	N/A	N/A	N/A	< 5.5	100	< 7.0	< 0.002
BLNK-02	N/A	Field Blank	FB	N/A	N/A	N/A	N/A	N/A	N/A	N/A	< 5.5	100	< 7.0	< 0.002
EX-1012-01	N/A	Consuelo Manduano - Scale Clerk/Ticket Writer	EX	7:28 AM	7:58 AM	30	2.0	2.0	2.0	60	< 5.5	100	< 7.0	< 0.045
PRS-1012-01	N/A	Consuelo Manduano - Scale Clerk/Ticket Writer	PRS	7:58 AM	2:48 PM	410	2.0	2.0	2.0	820	7	100	8.9	0.004
EX-1012-02	N/A	Ernesto Avalos - Wheel Loader Operator	EX	7:33 AM	8:03 AM	30	2.0	2.0	2.0	60	< 5.5	100	< 7.0	< 0.045
PRS-1012-02	N/A	Ernesto Avalos - Wheel Loader Operator	PRS	8:03 AM	2:53 PM	410	2.0	2.0	2.0	820	7	100	8.9	0.004

**Analyst:** Roy W. Bass Jr. (IDPH No. 100-19144)

- 1). PCM Air Samples are Analyzed by NIOSH Method 7400 "A" Counting Rules.
- 2). The Limit of Detection is 7.0 f/mm<sup>2</sup> (<LOD=Less than the Limit of Detection).
- 3). The OSHA PEL is 0.1 f/cc and the excursion limit is 1.0 f/cc.
- 4). The required Clearance Level is 0.01 f/cc in the State of Illinois.
- 5). The EPA recommended Clearance Level is 0.01 f/cc.

8 HOUR TIME-WEIGHTED AVERAGE								
RESP. TYPE	EMPLOYEE NAME	T1	C1	T2	C2	T3	C3	TWA (f/cc)
N/A	Consuelo Manduano	30	< 0.045	410	0.004			< 0.006
N/A	Ernesto Avalos	30	< 0.045	410	0.004			< 0.006

**ACTIVITY**  
 PREP - Site Preparation  
 REM - Gross Removal  
 GLBG - Glovebag Removal  
 CLN - Cleaning  
 O&M - Patch & Repair  
 NF - Non-Friable Removal

**SAMPLE TYPE**  
 BK - Background  
 PRS - Personal  
 EX - Excursion  
 CL - Clearance  
 ENV - Environmental  
 IC - Inside Containment  
 OC - Outside Containment  
 FB - Field Blank

**RESPIRATOR TYPE**  
 APR - Air Purifying Respirator  
 PAPR - Powered Air Purifying Respirator  
 SA - Supplied Air  
 N/A - None



GALSON

R 000166

Mr. Tyler Clark  
True North Consultants, Inc.  
1000 East Warrenville Road  
Suite 140  
Naperville, IL 60563

October 23, 2020

Account# 20025

Login# L521613

Dear Tyler Clark:

Enclosed are the analytical results for the samples received by our laboratory on October 19, 2020. All samples on the chain of custody were received in good condition unless otherwise noted. Any additional observations will be noted on the chain of custody.

Please contact client services at (888) 432-5227 if you would like any additional information regarding this report. Thank you for using SGS Galson.

Sincerely,

SGS Galson

A handwritten signature in cursive script that reads 'Lisa Swab'.

Lisa Swab  
Laboratory Director

Enclosure(s)



GALSON

## ANALYTICAL REPORT

 Account : 20025  
 Login No. : L521613

### Terms and Conditions & General Disclaimers

- This document is issued by the Company under its General Conditions of Service accessible at <http://www.sgs.com/en/Terms-and-Conditions.aspx>. Attention is drawn to the limitation of liability, indemnification and jurisdiction issues defined therein.
- Any holder of this document is advised that information contained herein reflects the Company's findings at the time of its intervention only and within the limits of Client's instructions, if any. The Company's sole responsibility is to its Client and this document does not exonerate parties to a transaction from exercising all their rights and obligations under the transaction documents. Any unauthorized alteration, forgery or falsification of the content or appearance of this document is unlawful and offenders may be prosecuted to the fullest extent of the law.

### Analytical Disclaimers

- Unless otherwise noted within the report, all quality control results associated with the samples were within established control limits or did not impact reported results.
- Note: The findings recorded within this report were drawn from analysis of the sample(s) provided to the laboratory by the Client (or a third party acting at the Client's direction). The laboratory does not have control over the sampling process, including but not limited to the use of field equipment and collection media, as well as the sampling duration, collection volume or any other collection parameter used by the Client. The findings herein constitute no warranty of the sample's representativeness of any sampled environment, and strictly relate to the samples as they were presented to the laboratory. For recommended sampling collection parameters, please refer to the Sampling and Analysis Guide at [www.ssgalson.com](http://www.ssgalson.com).
- Unrounded results are carried through the calculations that yield the final result and the final result is rounded to the number of significant figures appropriate to the accuracy of the analytical method. Please note that results appearing in the columns preceding the final result column may have been rounded and therefore, if carried through the calculations, may not yield an identical final result to the one reported.
- The stated LOQs for each analyte represent the demonstrated LOQ concentrations prior to correction for desorption efficiency (if applicable).
- Unless otherwise noted within the report, results have not been blank corrected for any field blank or method blank data.

**Accreditations** SGS Galson holds a variety of accreditations and recognitions. Our quality management system conforms with the requirements of ISO/IEC 17025. Where applicable, samples may also be analyzed in accordance with the requirements of ELAP, NELAC, or LELAP under one of the state accrediting bodies listed below. Current Scopes of Accreditation can be viewed at <http://www.ssgalson.com> in the accreditations section of the "About" page. To determine if the analyte tested falls under our scope of accreditation, please visit our website or call Client Services at (888) 432-5227.

National/International	Accreditation/Recognition	Lab ID#	Program/Sector
AIHA-LAP, LLC - IHLAP, ELLAP, EMLAP	ISO/IEC 17025 and USEPA NLLAP	Lab ID 100324	Industrial Hygiene, Environmental Lead, Environmental Microbiology
State	Accreditation/Recognition	Lab ID#	Program/Sector
New York (NYSDOH)	ELAP and NELAC (TNI)	Lab ID: 11626	Air Analysis, Solid and Hazardous Waste
New Jersey (NJDEP)	NELAC (TNI)	Lab ID: NY024	Air Analysis
Louisiana (LDEQ)	LELAP	Lab ID: 04083	Air Analysis, Solid Chemical Materials
Texas	Texas Dept. of Licensing and Regulation	Lab ID: 1042	Mold Analysis Laboratory license

### Legend

< - Less than	mg - Milligrams	MDL - Method Detection Limit	ppb - Parts per Billion
> - Greater than	ug - Micrograms	NA - Not Applicable	ppm - Parts per Million
l - Liters	m3 - Cubic Meters	NS - Not Specified	ppbv - ppb Volume
LOQ - Limit of Quantitation	kg - Kilograms	ND - Not Detected	ppmv - ppm Volume
ft2 - Square Feet	cm2 - Square Centimeters	in2 - Square Inches	ng - Nanograms



**GALSON**

LABORATORY ANALYSIS REPORT

6601 Kirkville Road  
East Syracuse, NY 13057  
(315) 432-5227  
FAX: (315) 437-0571  
www.sgsgalson.com

Client : True North Consultants, Inc.  
Site : ROMEOVILLE  
Project No. : T120448-04  
Date Sampled : 12-OCT-20  
Date Received : 19-OCT-20

Account No.: 20025  
Login No. : L521613  
Date Analyzed : 20-OCT-20  
Report ID : 1215277

---

**Respirable Dust**

<u>Sample ID</u>	<u>Lab ID</u>	<u>Air Vol</u> <u>liter</u>	<u>Total</u> <u>mg</u>	<u>Conc</u> <u>mg/m3</u>
RDS1012-01	L521613-1	1100	<0.050	<0.045
RDS1012-02	L521613-2	1100	<0.050	<0.045

COMMENTS: Please see attached lab footnote report for any applicable footnotes.

---

Level of Quantitation: 0.050 mg  
Analytical Method : mod. NIOSH 0600; Gravimetric  
Collection Media : PVC PW 37mm

Submitted by: HVN  
Date : 20-OCT-20  
Supervisor : KEG

Approved by: CMP



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LABORATORY ANALYSIS REPORT

6601 Kirkville Road  
East Syracuse, NY 13057  
(315) 432-5227  
FAX: (315) 437-0571  
www.sgsgalson.com

Client : True North Consultants, Inc.  
Site : ROMEOVILLE  
Project No. : T120448-04  
Date Sampled : 12-OCT-20  
Date Received : 19-OCT-20

Account No.: 20025  
Login No. : L521613  
Date Analyzed : 20-OCT-20 - 23-OCT-20  
Report ID : 1215819

Respirable Crystalline Silica (RCS): Quartz

Sample ID	Lab ID	Analyte	Air Vol l	ug	ug/m3
RDS1012-01	L521613-1	Quartz	1100	<5.0	<4.5
		Cristobalite	NA	NA	NA
		Tridymite	NA	NA	NA
		RCS	1100	<5.0	<4.5
RDS1012-02	L521613-2	Quartz	1100	<5.0	<4.5
		Cristobalite	NA	NA	NA
		Tridymite	NA	NA	NA
		RCS	1100	<5.0	<4.5

COMMENTS: Please see attached lab footnote report for any applicable footnotes.

Level of quantitation: Q:5.0ug  
Analytical Method : mod. NIOSH 7500/mod. OSHA ID-142; XRD  
Collection Media : PVC PW 37mm

Submitted by: APG  
Date : 23-OCT-20  
Supervisor : KRK

Approved by: NLO





GALSON

LABORATORY FOOTNOTE REPORT

6601 Kirkville Road  
East Syracuse, NY 13057  
(315) 432-5227  
FAX: (315) 437-0571  
www.sgsgalson.com

Client Name : True North Consultants, Inc.  
Site : ROMEVILLE  
Project No. : T120448-04

Date Sampled : 12-OCT-20  
Date Received: 19-OCT-20  
Date Analyzed: 20-OCT-20 - 23-OCT-20

Account No.: 20025  
Login No. : L521613

L521613 (Report ID: 1215277):

SOPs: GRAV-SOP-5(29), GRAV-SOP-6(25)

L521613 (Report ID: 1215277):

Accuracy and mean recovery data presented below is based on a 95% confidence interval (k=2). The estimated accuracy applies to the media, technology, and SOP referenced in this report and does not account for the uncertainty associated with the sampling process. The accuracy is based solely on spike recovery data from internal quality control samples. Where N/A appears below, insufficient data is available to provide statistical accuracy and mean recovery values for the associated analyte.

Parameter	Accuracy	Mean Recovery
Respirable Dust	+/-6.3%	101%

L521613 (Report ID: 1215819):

The reported RCS value is based on recoveries of silica polymorphs (Quartz, Cristobalite, and/or Tridymite) greater than the reporting level. The presence of silica below the reporting level cannot be ruled out. When all polymorph results are below the reporting level, RCS defaults to the lowest polymorph concentration. The calibration standard used for Tridymite analysis is not NIST traceable; however, when Tridymite is detected above the reporting level, it is included in the RCS calculation.

SOPs: ix-xrdreview(15), ix-xrdashprep(36), ix-calibrate(13), ix-xrdstdprep(30)

L521613 (Report ID: 1215819):

Accuracy and mean recovery data presented below is based on a 95% confidence interval (k=2). The estimated accuracy applies to the media, technology, and SOP referenced in this report and does not account for the uncertainty associated with the sampling process. The accuracy is based solely on spike recovery data from internal quality control samples. Where N/A appears below, insufficient data is available to provide statistical accuracy and mean recovery values for the associated analyte.

Parameter	Accuracy	Mean Recovery
Quartz	+/-10.9%	91.8%

R 000170

771824737990  
Date: 10/19/20  
Shipper: FEDEX  
Initials: MAK  
Prep: UNKNOWN

LS216B

GALSON

# CHAIN OF CUSTODY

<b>Turn Around Time (TAT):</b> (surcharge)		<b>Client Acct No.:</b> 20025		<b>Report To:</b> Mr. Tyler Clark		<b>Invoice To:</b> Accounts Payable		
<input checked="" type="checkbox"/> Standard	0%			<b>Company Name:</b> True North Consultants, Inc.		<b>Company Name:</b> True North Consultants, Inc.		
<input type="checkbox"/> 4 Business Days	35%			<b>Address 1:</b> 1000 East Warrenville Road		<b>Address 1:</b> 1000 East Warrenville Road		
<input type="checkbox"/> 3 Business Days	50%	<b>Original Prep No.:</b>		<b>Address 2:</b> Suite 140		<b>Address 2:</b> Suite 140		
<input type="checkbox"/> 2 Business Days	75%			<b>City, State Zip:</b> Naperville, IL 60563		<b>City, State Zip:</b> Naperville, IL 60563		
<input type="checkbox"/> Next Day by 6pm	100%	<b>Online COC No.:</b> 214647		<b>Phone No.:</b> 815 - 245 - 3660		<b>Phone No.:</b>		
<input type="checkbox"/> Next Day by Noon	150%			<b>Cell No.:</b>		<b>Email Address:</b> jhoelbl@consulttruenorth.com, jmakarewicz@consulttruenorth.com, rhoge@consulttruenorth.com		
<input type="checkbox"/> Same Day	200%			<b>Email reports to:</b> jhoelbl@consulttruenorth.com, tclark@consulttruenorth.com		<b>Comments:</b>		
<input type="checkbox"/> Samples submitted using the FreePumpLoan™ Program				<b>Email EDD to:</b> jhoelbl@consulttruenorth.com, tclark@consulttruenorth.com		<b>P.O. No.:</b>		
<input type="checkbox"/> Samples submitted using the FreeSamplingBadges™ Program				<b>Comments:</b>		<b>Payment info.:</b> <input type="checkbox"/> I will call SGS Galson to provide credit card info <input type="checkbox"/> Card on File (enter the last five digits on the line below)		
<b>Comments:</b>						<b>State Sampled:</b> IL	<b>Please indicate which OEL(s) this data will be used for:</b> <input checked="" type="checkbox"/> OSHA PEL <input type="checkbox"/> ACGIH TLV <input type="checkbox"/> MSHA <input type="checkbox"/> Cal OSHA <input type="checkbox"/> IAQ: _____ <input type="checkbox"/> Other: _____ Specify Limit(s) Specify Other	
<b>Site Name:</b> ROMEOVILLE		<b>Project:</b> T120448-04		<b>Sampled By:</b> Sam Bass		<b>List description of industry or Process/interferences present in sampling area:</b>		
<b>Sample ID</b> (Maximum of 20 Characters)	<b>Date Sampled</b>	<b>Collection Medium</b>	<b>Sample Volume</b> Sample-Time Sample Area	<b>Liters</b> Minutes in <sup>2</sup> , cm <sup>2</sup> , ft <sup>2</sup>	<b>Analysis Requested</b>	<b>Method Reference ^</b>	<b>Hexavalent Chromium</b> Process (e.g., welding, plating, painting, etc.)	
RDS1012-01	10/12/2020	3pc 37mm PW PVC	1100	L	Silica, crystalline quartz (with respirable dust)	mod. NIOSH 0600/7500/mod. OSHA ID-142; Grav./XRD		
<input type="checkbox"/> ^ If the method(s) indicated on the COC are not our routine/preferred method(s), we will substitute our routine/preferred methods. If this is not acceptable, check here to have us contact you.								
<b>Chain of Custody</b>	<b>Print Name / Signature</b>		<b>Date</b>	<b>Time</b>	<b>Print Name / Signature</b>		<b>Date</b>	<b>Time</b>
Relinquished By:	Tyler Clark <b>SIGNED ELECTRONICALLY</b>		10/16/2020	15:48	Received By:	Kris Stone	10/19/20	11:11
Relinquished By:					Received By:			
Samples received after 3pm will be considered as next day's business.						Online COC No.: 214647 Prep No.: Account No.: 20025 Finalized: 10/16/2020 4:50:58 PM		
All services are rendered in accordance with the applicable SGS General Conditions of Service accessible via: <a href="http://www.sgs.com/en/Terms-and-Conditions.aspx">http://www.sgs.com/en/Terms-and-Conditions.aspx</a>								

[illegible]

☐ ^ If the method(s) indicated on the COC are not our routine/preferred method(s), we will substitute our routine/preferred methods. If this is not acceptable, check here to have us contact you.

Chain of Custody	Print Name / Signature	Date	Time		Print Name / Signature	Date	Time
Relinquished By :	Tyler Clark	<b>SIGNED ELECTRONICALLY</b>	10/16/2020	15:48	Received By : <b>Kris Stone</b>	10/19/20	11:11
Relinquished By :					Received By :		

Samples received after 3pm will be considered as next day's business.

Online COC No. : 214647

Prep No. :

Account No. : 20025

Finalized : 10/16/2020 4:50:58 PM

All services are rendered in accordance with the applicable SGS General Conditions of Service accessible via: <http://www.sgs.com/en/Terms-and-Conditions.aspx>

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SGS North America | 6601 Kirkville Road E. Syracuse, NY 13057, USA | t +1 888 432 5227 | +1 315 432 5227 | [www.galsonlabs.com](http://www.galsonlabs.com) | [www.sgs.com](http://www.sgs.com)

Member of the SGS Group (SGS SA)

ROMEOVILLE YTD 2021 (Tonnage)										48,321
MONTH	INBOUND	OUTBOUND	SORT	CHOP	TROMMEL	BLEND	TRASH	STEEL	% Non Recycle	Volume on Hand
Jan	48	19195	0	25400	0	0	8	62	0.0%	29,174
Feb	23	22503	0	10500	0	0	0	40	0.0%	6,694
Mar	139	0	0	3100	1000	0	0	0	0.0%	6,833
Apr	783	95	0	0	770	0	20	17	2.3%	7,521
May	820	52	0	0	0	0	24	2	46.2%	8,289
Jun	691	925	0	0	0	0	16	1	1.7%	8,055
Jul	679	413	0	0	1000	0	16	0	1.1%	8,321
Aug	709	1304	0	0	1350	0	16	3	0.6%	7,726
Sep	573	339	0	0	1100	0	16	0	1.1%	7,960
Oct	446	683	0	0	0	0	16	3	2.3%	7,723
Nov	332	0	0	0	0	0	0	2	#DIV/0!	8,055
Dec	94	0	0	0	0	0	8	0	#DIV/0!	8,149
	5337	45509	0	39000	5220	0	140	130		

ROMEOVILLE YTD 2020 (Tonnage)										41,834
MONTH	INBOUND	OUTBOUND	SORT	CHOP	TROMMEL	BLEND	TRASH	STEEL	% Non Recycle	Volume on Hand
Jan	37	0	0	0	0	0	4	12	#DIV/0!	41,871
Feb	27	0	0	0	0	0	0	0	#DIV/0!	41,898
Mar	118	0	0	0	0	0	0	0	#DIV/0!	42,016
Apr	779	345	0	0	400	0	16	0	2.1%	42,450
May	992	216	0	2950	630	0	28	16	0.7%	43,226
Jun	1,322	832	0	0	0	0	32	4	3.8%	43,716
Jul	1,263	918	0	0	250	0	36	6	3.1%	44,061
Aug	1,153	622	0	0	0	0	12	4	1.9%	44,592
Sep	1,336	445	0	3400	1000	0	28	12	0.6%	45,483
Oct	1,555	364	0	0	0	0	48	4	13.2%	46,674
Nov	1,137	0	0	0	450	0	4	1	0.9%	47,811
Dec	510	0	0	13700	0	0	56	31	0.4%	48,321
	10229	3742	0	20050	2730	0	264	90		

# Southwind RAS, LLC

2250 Southwind Blvd. | Bartlett, IL 60103 | (630) 233-5700

<b>Date:</b> 06-14-22		<b>Location:</b> McCook 6616-07	
		<b>Time:</b> 09:37	
<b>Sold To:</b>		<b>Cust #:</b>	3297
GD CONSTRUCTION		<b>Truck #:</b>	1GD
637 DANA CT		<b>Order #:</b>	3297-2
NAPERVILLE, IL 60563			
<b>Project #:</b> 3297-2		<b>Incoming Shingles</b>	
		Romeo-Thorn-Bart-McC-LITH-Elburn	
<b>Product #:</b> D905	<b>Incoming Shingles - Clean</b>		
<b>Gross:</b>	22,660	<b>Load #:</b>	1
<b>Tare:</b>	12,600	<b>Truck Tons:</b>	5.03
<b>Net:</b>	10,060	<b>Total Tons:</b>	5.03

\_\_\_\_\_  
Driver Signature      Ticket #: 4121128

AS EVIDENCED BY SIGNATURE, OR DEPARTURE FROM SELLER'S FACILITY, CARRIER ACKNOWLEDGES THAT CARRIER IS SOLELY RESPONSIBLE FOR THE ACCURACY OF THIS VEHICLE'S TARE WEIGHT, AXLE WEIGHTS AND GROSS WEIGHT. CARRIER SHALL BE RESPONSIBLE FOR NOTIFYING SELLER WHEN ANY TRUCK OR TRAILER HAS BEEN OVERLOADED SO AS TO RENDER IT OUT OF COMPLIANCE WITH ANY APPLICABLE WEIGHT LIMITS. TO THE MAXIMUM EXTENT ALLOWED BY LAW, CARRIER SHALL INDEMNIFY SELLER FOR ANY LOSS CAUSED BY OVERLOADING.

\* The following terms and conditions shall apply if not paid within 30 days. The unpaid balance shall bear interest at the rate of 1 1/2% per month (18% per annum).

\* Buyer also shall assume payment of attorney's fees and collection fees if necessary.

**Black Dog Petroleum LLC dba Southwind RAS**

2250 Southwind Blvd. | Bartlett, IL 60103 | (630) 233-5700

Date: 06-06-22		Location: McCook 6616-07	
		Time: 09:38	
Sold To: LINDAHL BROTHERS INC.		Cust #:	1456
		Truck #:	904MAT
		Order #:	1456-230
Project #: 1456-230 RAS Supply 2022			
6525 99th St. - Chicago Ridge			
Product #: M912 RAS 017FM98			
Gross:	71,500	Load #:	2
Tare:	29,000	Truck Tons:	21.25
Net:	42,500	Total Tons:	43.54

\_\_\_\_\_  
Driver Signature      Ticket #: 4120531

AS EVIDENCED BY SIGNATURE, OR DEPARTURE FROM SELLER'S FACILITY, CARRIER ACKNOWLEDGES THAT CARRIER IS SOLELY RESPONSIBLE FOR THE ACCURACY OF THIS VEHICLE'S TARE WEIGHT, AXLE WEIGHTS AND GROSS WEIGHT. CARRIER SHALL BE RESPONSIBLE FOR NOTIFYING SELLER WHEN ANY TRUCK OR TRAILER HAS BEEN OVERLOADED SO AS TO RENDER IT OUT OF COMPLIANCE WITH ANY APPLICABLE WEIGHT LIMITS. TO THE MAXIMUM EXTENT ALLOWED BY LAW, CARRIER SHALL INDEMNIFY SELLER FOR ANY LOSS CAUSED BY OVERLOADING.

\* The following terms and conditions shall apply if not paid within 30 days. The unpaid balance shall bear interest at the rate of 1 1/2% per month (18% per annum).

\* Buyer also shall assume payment of attorney's fees and collection fees if necessary.



**Johnson, Kyle E.**

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**From:** Josh Quinn <JoshQ@grp7.com>  
**Sent:** Thursday, February 9, 2023 2:07 PM  
**To:** Loeza, Jose L.  
**Subject:** [External] RE: IEPA Inspection RE: Upcoming Inspection, 27 December 2022  
**Attachments:** 4121128.pdf; 4120531.pdf

Please see below (in red) and attached for responses to your additional questions.

Thanks,

- Josh Quinn  
 C: 630.940.5789

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**From:** Loeza, Jose L. <Jose.Loeza@Illinois.gov>  
**Sent:** Wednesday, February 8, 2023 8:46 AM  
**To:** Josh Quinn <JoshQ@grp7.com>  
**Subject:** RE: IEPA Inspection RE: Upcoming Inspection, 27 December 2022

Mr. Quinn,

Thank you for the information. I have a few more questions:

- During the months of January and February 2021, there was 41,698 tons of outbound RAS. Where did that go? What was its end use? This material was sent to Reliable Asphalt Corporation – Pulaski for use in the hot mix asphalt plant.
- Can you show me load tickets and bills of lading? I want to see how inbound and outbound loads are ticketed/tracked. A copy of an inbound and outbound load ticket are attached to this email.
- What accreditations does the Southwind RAS lab in Bartlett have? This lab does not have any official accreditations; each employee that works on the microscope has been certified in polarized light microscopy (PLM) through the MICA (Microscopy Instruction Consultation & Analysis) program.

Thank you,  
 Jose Loeza

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**From:** Josh Quinn <JoshQ@grp7.com>  
**Sent:** Tuesday, February 7, 2023 9:18 AM  
**To:** Loeza, Jose L. <Jose.Loeza@Illinois.gov>  
**Subject:** [External] RE: IEPA Inspection RE: Upcoming Inspection, 27 December 2022

Mr. Loeza,

My apologies again for the delay in getting back to you.

- Attached are exposure monitoring reports for 2021 and 2020

- Attached are the monthly summaries for 2021 and 2020
- Our inbound loads are tested every 125 tons; 1 sample is taken for each 125 tons received.
- Our outbound loads are tested every 500 tons; 1 sample is taken for every 500 tons produced for shipment as final product.

Thanks again and please let me know if you have any questions or need anything additional.

- Josh Quinn

C: 630.940.5789

---

**From:** Loeza, Jose L. <[Jose.Loeza@Illinois.gov](mailto:Jose.Loeza@Illinois.gov)>

**Sent:** Monday, February 6, 2023 12:07 PM

**To:** Josh Quinn <[JoshQ@grp7.com](mailto:JoshQ@grp7.com)>

**Subject:** RE: IEPA Inspection RE: Upcoming Inspection, 27 December 2022

Good afternoon Mr. Quinn,

I wanted to follow-up on my last email. When can I expect the requested documents/information?

Thank you,  
Jose Loeza

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**From:** Loeza, Jose L.

**Sent:** Monday, January 30, 2023 11:48 AM

**To:** Josh Quinn <[JoshQ@grp7.com](mailto:JoshQ@grp7.com)>

**Subject:** RE: IEPA Inspection RE: Upcoming Inspection, 27 December 2022

Mr. Quinn,

Thank you for the information. You are all set for information on the last rejected load. For my report, I will mention there has not been a rejected load in the last 3 years and that should be ok.

Can you also send me:

- Monthly summary report for 2021 and 2020
- Exposure assessments for 2021 and 2020
- How often are inbound/outbound loads tested for asbestos?

Thank you,

**Jose Luis Loeza**

Environmental Protection Specialist

Illinois Environmental Protection Agency

Bureau of Land | Field Operations Section

9511 West Harrison Street, 3<sup>rd</sup> Floor

Des Plaines, IL 60016

Office: 847-294-4066

Cell: 847-421-8730



**From:** Josh Quinn <[JoshQ@grp7.com](mailto:JoshQ@grp7.com)>  
**Sent:** Friday, January 27, 2023 8:06 AM  
**To:** Loeza, Jose L. <[Jose.Loeza@Illinois.gov](mailto:Jose.Loeza@Illinois.gov)>  
**Subject:** [External] RE: IEPA Inspection RE: Upcoming Inspection, 27 December 2022

Mr. Loeza,

It was a pleasure meeting with you yesterday. Please find attached a zip file with the requested information. It includes:

- Monthly summary report for the facility for all of 2022, which includes:
  - Tonnage by month of inbound/outbound materials
  - Current quantity on hand
  - Production information of when grinding (chopping) was done on site
  - Retention time in top table
- Asbestos training certificates for 2022
- A copy of a receipt from our garbage disposal vendor, Homewood Disposal
- Inbound PLM sample results report
- Outbound PLM sample results report
- Exposure monitoring conducted in 2022 by a consultant

The only thing I am still trying to locate is the last rejected load information. We have not had any for the last 3 years but I will keep looking for the previous years.

Thank you and please let me know if you have any questions or need anything additional.

- Josh Quinn  
 C: [630.940.5789](tel:630.940.5789)

**From:** Loeza, Jose L. <[Jose.Loeza@Illinois.gov](mailto:Jose.Loeza@Illinois.gov)>  
**Sent:** Monday, January 9, 2023 9:11 AM  
**To:** Josh Quinn <[JoshQ@grp7.com](mailto:JoshQ@grp7.com)>  
**Subject:** IEPA Inspection RE: Upcoming Inspection, 27 December 2022

Yes. January 26<sup>th</sup> at 0900AM, at 5 S. Material Rd., Romeoville, IL. 60446.

Thank you,  
 Jose Loeza

**From:** Josh Quinn <[JoshQ@grp7.com](mailto:JoshQ@grp7.com)>  
**Sent:** Monday, January 9, 2023 8:23 AM  
**To:** Loeza, Jose L. <[Jose.Loeza@Illinois.gov](mailto:Jose.Loeza@Illinois.gov)>  
**Subject:** [External] RE: Upcoming Inspection, 27 December 2022

January 26 would work best for me, can we schedule it then?

Thanks and please confirm.

R 000179

- Josh Quinn  
C: 630.940.5789

**From:** Loeza, Jose L. <[Jose.Loeza@Illinois.gov](mailto:Jose.Loeza@Illinois.gov)>  
**Sent:** Friday, January 6, 2023 1:16 PM  
**To:** Josh Quinn <[JoshQ@grp7.com](mailto:JoshQ@grp7.com)>  
**Subject:** RE: Upcoming Inspection, 27 December 2022

Good afternoon Mr. Quinn,

I am looking to reschedule the Southwind RAS BUD inspection at the Romeoville site. This month I am available January 17, 23, or 25-27; what day works best for you?

Thank you,  
Jose Loeza

**From:** Josh Quinn <[JoshQ@grp7.com](mailto:JoshQ@grp7.com)>  
**Sent:** Monday, December 26, 2022 8:46 AM  
**To:** Loeza, Jose L. <[Jose.Loeza@Illinois.gov](mailto:Jose.Loeza@Illinois.gov)>  
**Cc:** Shehane, Donna <[Donna.Shehane@Illinois.gov](mailto:Donna.Shehane@Illinois.gov)>  
**Subject:** [External] Re: Upcoming Inspection, 27 December 2022

Mr Loeza,

Wanted to let you know that I came down with Covid last week before the holiday and see whether you want to reschedule the inspection. I am past the 5-day isolation period but within the 10-day period from when I initially tested positive. I can wear a mask during the inspection but was not sure what Agency protocols require at this time.

Sorry for any inconvenience and please let me know how you would like to handle.

Thanks,

- Josh Quinn

C: 630.940.5789

---

**From:** Loeza, Jose L. <[Jose.Loeza@Illinois.gov](mailto:Jose.Loeza@Illinois.gov)>  
**Sent:** Wednesday, December 14, 2022 1:55:56 PM  
**To:** Josh Quinn <[JoshQ@grp7.com](mailto:JoshQ@grp7.com)>  
**Cc:** Shehane, Donna <[Donna.Shehane@Illinois.gov](mailto:Donna.Shehane@Illinois.gov)>  
**Subject:** Upcoming Inspection, 27 December 2022

Josh,

This is a notification for upcoming inspection at 5 S. Material Rd., Romeoville, IL. 60446, on December 27<sup>th</sup> at 8:00AM

Thank you,

**Jose Luis Loeza**

Environmental Protection Specialist

Illinois Environmental Protection Agency

Bureau of Land

Field Operations Section

9511 Harrison Street, 3<sup>rd</sup> Floor

Des Plaines, IL 60016

Office Phone: 847-294-4066

Mobile Phone: 847-421-8730

[Jose.Loeza@illinois.gov](mailto:Jose.Loeza@illinois.gov)

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STATE OF ILLINOIS )

) SS.

COUNTY OF COOK)Southwind RAS, LLCAffidavit of Beneficial Use Determination- End UserI, Will Gallagher, being first duly sworn under oath, state and depose as follows:

- 1.0 That I am an Officer or Duly Authorized Agent of Gallagher Asphalt, an owner of the subject manufacturing facility identified in the Illinois Environmental Protection Agency LPC - PA - 27 form, located at 1711 Brandon Road, Joliet, IL 60436.
- 2.0 That the incoming processed shingles will used in accordance with any State, ISTHA, City, or County approved mix designs and will be distributed for the purpose of being used in hot mix asphalt or similar asphalt applications which meet the appropriate specifications.
- 3.0 That in said capacity I have reviewed the specifications and have personal knowledge of the operations of said property sufficient to execute this affidavit.
- 4.0 That on behalf of the "End User" the description of the storage and use of the material by the manufacturer or end user described in the application is true and accurate to the best of my knowledge.

Print Will GallagherSignature *Will Gallagher*

Subscribed and sworn to before me

this 1 day of March 2023.*Kristin D Mann*

Notary Public





STATE OF ILLINOIS )

) SS.

COUNTY OF COOK)Southwind RAS, LLC**Affidavit of Beneficial Use Determination- End User**I, Brian Gormsen, being first duly sworn under oath, state and depose as follows:

1.0 That I am an Officer or Duly Authorized Agent of, K-Five Construction Corp., an owner of the subject manufacturing facility identified in the Illinois Environmental Protection Agency LPC - PA - 27 form, located at 1375 Joliet Road, Romeoville, IL 60446.

2.0 That the Incoming processed shingles will used in accordance with any State, ISTHA, City, or County approved mix designs and will be distributed for the purpose of being used in hot mix asphalt or similar asphalt applications which meet the appropriate specifications.

3.0 That in said capacity I have reviewed the specifications and have personal knowledge of the operations of said property sufficient to execute this affidavit.

4.0 That on behalf of the "End User" the description of the storage and use of the material by the manufacturer or end user described in the application is true and accurate to the best of my knowledge.

Print Brian GormsenSignature 

Subscribed and sworn to before me

this 1st day of March 2023.

Notary Public



## Illinois Environmental Protection Agency

Bureau of Land – Field Operations Section

**Inspection Report****General Facility Information**

<b>BOL ID</b>	1970905199	<b>Evaluation Date</b>	9/25/2023
<b>USEPA ID</b>	N/A	<b>Region</b>	Des Plaines
<b>Site Name</b>	Southwind RAS LLC	<b>County</b>	Will
<b>Address</b>	5 S. Material Rd.	<b>Phone</b>	630-233-5700
<b>City/State/Zip</b>	Romeoville, IL 60446	<b>EJ Status</b>	Minority
<b>Limited English</b>	<input type="checkbox"/>	<b>Primary Language</b>	English

**Observations**

<b>Time</b>	1000 - 1110
<b>Weather Conditions</b>	Cloudy
<b>Temperature</b>	66 Fahrenheit
<b>Photos Taken</b>	Yes (8)

**Evaluation Type**

Solid Waste Program - Beneficial Use Determination

**Owner**

Heidelberg Materials Midwest Aggregate Inc  
 Attn: Christopher Ward  
 300 E. John Carpenter Freeway #1645  
 Irving, TX 75062

**Operator**

Southwind RAS LLC  
 Attn: Josh Quinn  
 2250 Southwind Blvd.  
 Bartlett, IL 60103

**Inspection Participants**

<u>Person</u>	<u>Affiliation</u>	<u>Phone</u>
Jose Loeza	IEPA FOS Primary Inspector	(847) 294-4066

**Persons Interviewed**

<u>Person</u>	<u>Phone</u>	<u>E-Mail</u>
Josh Quinn	(630) 940-5789	joshq@grp7.com

**Permit**

<u>Application Date</u>	<u>Log #</u>	<u>Issue Date</u>	<u>Expiration Date</u>	<u>Mod/Sp #</u>	<u>Mod/Sp Date</u>
3/26/2021	Solid Waste: BUD11-013-R2	10/14/2021	8/15/2026	Log No. BUD11-013-R2	10/14/2021
12/4/2020	Solid Waste: BUD20-016	10/7/2021	10/1/2026	Log No. BUD20-016	10/7/2021

**Active Enforcement Orders**

<u>CACO</u>	<u>Consent Decree</u>	<u>CAFO</u>	<u>IPCB</u>	<u>Federal Court</u>	<u>State Court</u>
NONE					

## ***Executive Summary***

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On September 25, 2023, I, Jose Loeza, conducted a follow-up beneficial use determination (BUD) inspection at Southwind RAS LLC located at 5 S. Material Rd., Romeoville, IL. 60446. The site stores and processes recycled asphalt shingles (RAS). The purpose of the inspection was to determine compliance with the Illinois Environmental Protection Act, Beneficial Use Determination Application Log No. BUD11-013-R2 and BUD20-016, and the Executed Compliance Commitment Agreement. I interviewed environmental compliance manager, Josh Quinn. Apparent violations were observed.

## ***Evaluation Narrative***

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### **Background**

Southwind RAS LLC currently has two BUDs. BUD11-013-R2 is for the storage, management, and use of RAS as a raw ingredient in hot mix asphalt (HMA) pavement. BUD 20-016 is for the use of RAS as an ingredient, along with fractionated reclaimed asphalt pavement (FRAP), in a pavement blend for dust control and general road improvements. BUD20-016 does not add to the maximum amount of processed and unprocessed shingles, 38,497 tons, allowed at 5 S. Material Rd. under BUD11-013-R2. The previous inspection was conducted on January 26, 2023. It resulted in Violation Notices L-2023-00093, L-2023-00094, and an Executed Compliance Commitment Agreement dated August 30, 2023. Previously, a November 13, 2019 inspection resolved violations from an inspection on November 16, 2016, that resulted in Violation Notice L-2016-01151 and subsequent Compliance Commitment Agreement dated March 28, 2017.

### **On-site Evaluation**

I arrived at 5 S. Material Rd. at approximately 10:00AM. I met Mr. Quinn at the entrance of the facility. He presented a Facility Operating Record Binder that had documents I need to review during the inspection. Mr. Quinn said the binder will be updated monthly. The binder had the following documents:

- **Asbestos training records** - Asbestos training for employees was conducted by Earthtech Inc. on March 7 and 23, 2023.
- **Sampling results** - SGS Forensic Laboratories of Downers Grove performed inbound and outbound asbestos sampling on May 11 and August 30, 2023. SGS Forensic Laboratories is a NIST certified laboratory. This was condition III.4.b of the Executed Compliance Commitment Agreement (ECCA) and resolves citations of BUD condition 20.
- **Air exposure assessment monitoring reports** - The air exposure assessment (Attachment A2, Appendix A) was conducted by True North Consultants on August 23, 2023. The report describes wheel loader and skid steer operations, material offloading, stockpiling, loading the screener machine to separate shingle materials, but it does not describe grinding operations. This is a violation of the ECCA condition III.4.a, and continuing violation of BUD Conditions 11 and 21. I recommended the site keeps a log of their grinding schedule to show compliance with this condition of the CCA and the BUD.
- **Monthly tonnage summaries** - Monthly tonnage summaries showed a year-to-date tonnage record of 2,640 tons inbound, 4,266 tons outbound, and 11,266 tons of unprocessed shingles on site.
- **Affidavits** - The binder only had end-user affidavits for Gallagher Asphalt and K-Five Construction.
- **Previous IEPA inspection reports**

In addition to the items in the binder, I needed to see the following records:

- **Tonnage of processed material onsite** – Mr. Quinn said he will follow up in an email.

- **Density factor for the survey of unprocessed shingles** – Mr. Quinn said he will follow up in an email.
- **Grinding schedule** – Mr. Quinn said he will follow up in an email.
- **Disposal receipts for general refuse** – Mr. Quinn said he will follow up in an email.
- **Supply certification forms** – We walked to the scale house to review the remaining records. There was no record of Supply Certification Forms kept since my last inspection on January 26, 2023. The few forms that were presented were incomplete; they were either missing signatures, dates, or contact information. This is a violation of the Executed Compliance Commitment Agreement condition III.4.c, continuing violation of BUD Condition 10, and new apparent violations of BUD Conditions 13 and 16.
- **Inbound/outbound load tickets** – Outbound load tickets showed a company named Orange Crush LLC as the end user. I asked to see an end user affidavit for Orange Crush LLC. Southwind RAS did not have an end user affidavit. That is a violation of the Executed Compliance Commitment Agreement condition III.4.c and new apparent violation of BUD Condition 12. This is the second time Southwind RAS LLC fails to produce end user affidavits during an inspection and must obtain them afterwards.

Southwind RAS needs to keep these documents of their operating record onsite.

Next, we did a site tour. We started at the south face of the pile and walked clockwise around the site. Photos 1-2 show piles of processed RAS material. Photo 3 shows the south face of the unprocessed shingles pile. Photos 4-5 show a general refuse container and the west face of the shingles pile. Photo 6 shows the northeast face of the pile. Photos 7-8 show ponding of reddish water on the southeast face of the pile. Southwind RAS should grade this area to avoid ponding of stormwater run-on. Stormwater normally drains to a vegetated ditch east of the facility, then runs south under the facility entrance culvert to the Des Plaines River.

After the site tour, I did an overview of the inspection and summarized the findings. Mr. Quinn made notes to follow up with missing documents by email. I thanked Mr. Quinn for his time and ended the inspection at 11:10AM.

### Off-site Evaluation

Later in an email, Mr. Quinn sent me the following documents:

- **One end user affidavit** – The end user affidavit for Orange Crush LLC (Attachment B2) was dated September 26, 2023. End user affidavits should be produced and kept for all end users.
- **One supply certification form** – The supply certification form (Attachment C2) for S & S Builders in Bolingbrook was dated September 25, 2023. Supply certification forms should be produced and kept for all end users. Forms should be completely filled out.
- **Grinding Schedule** – Since the air exposure assessment did not describe grinding operations or machinery, I asked to see the site's grinding schedule (Attachment D2). The grinding schedule shows no grinding operations on August 23, 2023 during the air exposure assessment performed by True North Consultants.
- **Tonnage of processed RAS onsite** – Tonnage of processed RAS onsite is 1,310 tons (Attachment E2). Therefore, Southwind RAS LLC's operating record shows a total of 12,576 tons of processed and unprocessed material onsite.
- **Last general refuse receipt** – Two containers of general refuse were removed on August 28, 2023 by Homewood Disposal Services.
- **Density factor on the survey of unprocessed shingles pile** – The survey of the pile was conducted by Mackie Consultants LLC of Rosemont, IL (Attachment A2, Appendix B). Only the unprocessed material pile was surveyed. The processed material pile was not surveyed. The survey showed 65,200 cubic yards for the estimated volume of the unprocessed pile. It did not contain information on the estimated weight or density factor of the pile. However, Mr. Quinn says the density factor is 0.8 tons per cubic yard (Attachment E2). Using that density factor, I calculate approximately 52,160 tons of unprocessed material.

Southwind RAS has submitted enough information to meet condition III.4.d of the ECCA, however violations of BUD Conditions 15, 17, and 18 are continuing for exceeding maximum amounts of processed and unprocessed material, exceeding the 4-year retention time, not meeting the 25% percent of inventory that needs to be removed each year, and not maintaining an adequate recordkeeping system. Of unprocessed material alone, there is a significant ~40,000-ton difference between what Southwind RAS's operating record claims is onsite and what the survey estimates is onsite.

The explanation provided by Southwind RAS LLC for the 7,052-ton discrepancy in the tonnage summaries (Attachment A2, Appendix C) is not adequate and does not comply with condition III.4.e of the ECCA.

Based on my findings of the onsite and offsite evaluation, Southwind RAS LLC has resolved citations of BUD condition 20, and met conditions III.4.b and III.4.d of the Executed Compliance Commitment Agreement. All other violations are continuing, including new apparent violations of BUD conditions 12, 13, and 16.

<b>Summary of Apparent Violation(s)</b>			
<b>Status</b>	<b>Date</b>	<b>Violation</b>	<b>Narrative</b>
Continuing	1/26/2023	21(a)	Cause or allow open dumping
Continuing	1/26/2023	21(d)(1)	Conduct a waste storage, treatment, or disposal operation without a permit
Continuing	1/26/2023	22.54(d)	No recipient of a beneficial use determination shall manage or use the material that is the subject of the determination in violation of the determination or any conditions in the determination, unless the material is managed as a waste.
Continuing	1/26/2023	BUD Condition	BUD11-013-R2 / Condition 10: Romeoville RAS Recycling Facility shall retain copies of all operating records, including any affidavits, records of retention times, training records, daily reports, inspection reports, incident reports, material profile identification sheets, re-certifications, certifications of representative samples, laboratory analyses, special analysis plans, any waiver of requirements at the office of the facility for five years after this authorization expires. These records shall be made available to the Illinois EPA or their designee through intergovernmental agreement upon request.
Continuing	1/26/2023	BUD Condition	BUD 11-013-R2 / Condition 11: The RAS shall be inspected upon receipt at Romeoville RAS Recycling Facility and loads which are not clean shall be rejected. A not clean load is defined by a load containing any amount of non-shingle materials such as paper, plastic, flashing or wood. Any load with visible non-shingle material must be rejected. As the clean load of shingles is unloaded into the raw shingles storage area, any concealed non-shingle material detected during unloading must be removed immediately during the unloading process. Acceptance of waste is not permitted at the site. Shingles shall be managed onsite in accordance with the applications and the conditions of this approval. Shingles must not be abandoned or allowed to escape into the environment. The clean material shall be stockpiled and tested in accordance with the Best Management Practices (BMPs) submitted and approved as described in your application Log No. BUD11-013-R2.
Continuing	1/26/2023	BUD Condition	BUD11-013-R2 / Condition 15: The maximum amount of processed and unprocessed shingles stored at Romeoville RAS Recycling Facility, 5 South Material Road, Romeoville, Illinois 60446 is 38,497 tons at any one time. The basis of this "hard cap" is a base cap of 10,000 tons plus a 4-year rolling average of an additional 7,124 tons per year as the "marking-based cap". All shingles received at the site shall be processed onsite and removed from the site within 4 years of initial acceptance. At least 25% of the facility's entire inventory present during a calendar year must be removed during the following calendar year. Stored volumes of the total combined volume of processed and unprocessed shingles may exceed 39,000 tons only if the facility can produce documentation (i.e., contracts, order requests, or letters of intent) from either an IDOT, Illinois State Toll Highway Authority, or private hot-mix asphalt producer showing the entire volume of processed and unprocessed shingles exceeding 38,497 tons will be needed by a RAS user authorized under Condition 12 above, within the 4-year period after the shingles are received. This documentation must be provided within 30 days after requested verbally or in writing by the Illinois EPA or its designee through intergovernmental agreement upon request during normal business hours.



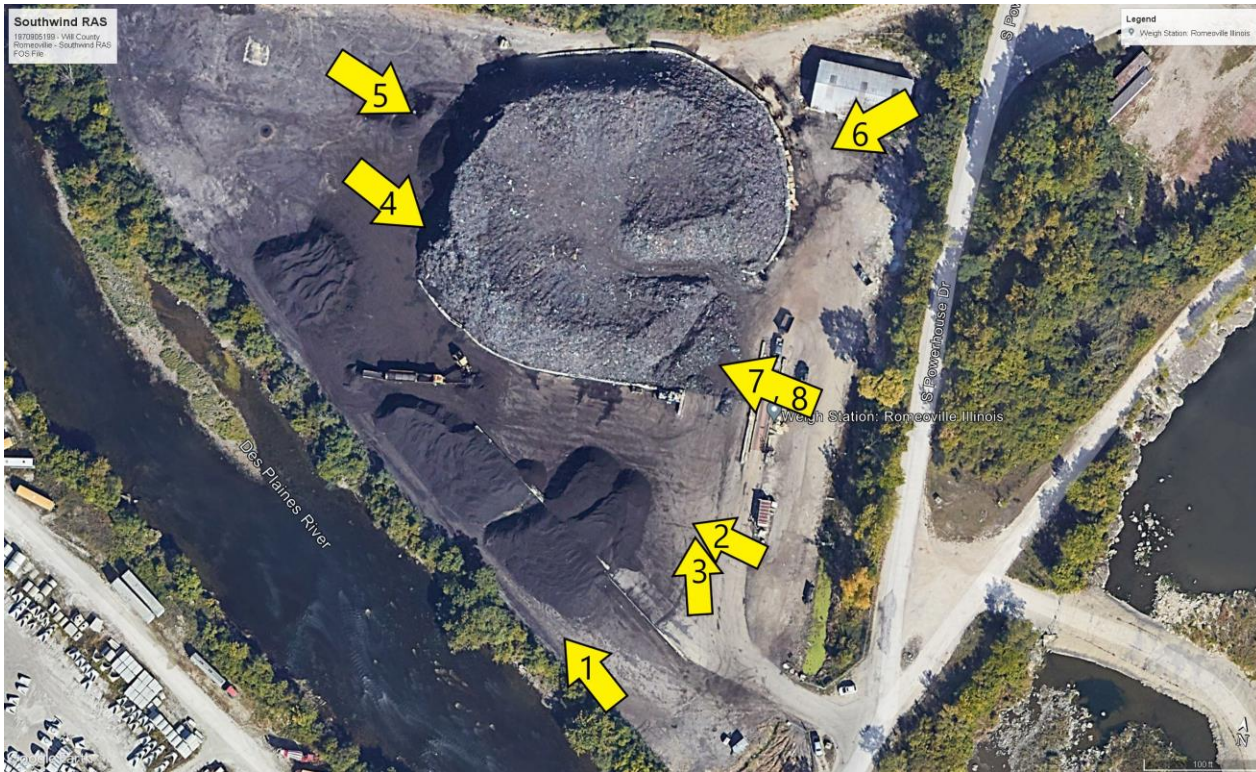
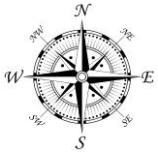
Continuing	1/26/2023	BUD Condition	BUD11-013-R2 / Condition 17: Shingles shall be processed to meet the desired IDOT or Illinois State Toll Highway Authority specification. Material meeting the desired specification shall be conveyed to the on-site processed shingles storage area. Oversized material must be conveyed back to the grinder, reground and re-screened to meet the size specification. Records of tonnage of tear-off shingles and retention times shall be compiled monthly and maintained in bound or electronically imaged chronological files.
Continuing	1/26/2023	BUD Condition	BUD11-013-R2 / Condition 18: Southwind RAS I, LLC shall develop and maintain a recordkeeping system that is adequate to track the storage time on site and volumes of shingles to demonstrate compliance with conditions 15 and 17 above.
Continuing	1/26/2023	BUD Condition	BUD11-013-R2 / Condition 21: This BUD only applies to shingles that have been processed following the shingles control plan presented in this application for testing, and removal of material containing asbestos and using method EPA600/R-93/116 to detect asbestos in the shingles.
Resolved	1/26/2023	BUD Condition	BUD11-013-R2 / Condition 20: The IDOT specification for shingle recycling shall be conducted in accordance with IDOT's contract specifications for Reclaimed Asphalt Shingles (RAS) and Policy Memorandum-Reclaimed Asphalt Shingles (RAS) Sources. The Illinois Tollway specification for shingle recycling shall be conducted in accordance with Construction Bulletin 10-01: Guidelines of Best Management Practices for the Operation of Asphalt Shingle Recycling Facilities. Any deviation from these procedures or specifications, except to comply with IDOT updates from specifying Reclaimed Asphalt Shingles (RAS) and Policy Memorandum-Reclaimed Asphalt Shingles (RAS) Sources, is subject to the requirements of Condition 1.
New	9/25/2023	BUD Condition	BUD11-013-R2 / Condition 12: This BUD authorizes the use of processed RAS from Romeoville RAS Recycling Facility that have been processed in accordance with the application Log No. BUD11-013-R2 and the conditions of this approval to be used by Reliable Asphalt Corporation, 3741 S. Pulaski Avenue, Chicago, Illinois 60623 in HMA. The HMA plants may use additional mix designs under this BUD if they document that the RAS will be used in a mix design that has been certified by an Illinois Registered Professional Engineer for use in HMA pavement. Additional HMA plants may receive the RAS identified in this BUD if the HMA plant operates within the limitations and conditions of this authorization and keeps the required records and provides an affidavit to the processor, Black Dog Petroleum, LLC. A copy of any affidavit generated to comply with this condition shall be kept with the operating record at Romeoville RAS Recycling Facility, 5 South Material Road, Romeoville, Illinois 60446. The operating record must be made available to the Illinois EPA personnel or their designee through intergovernmental agreement upon request.

New	9/25/2023	BUD Condition	BUD11-013-R2 / Condition 13: The generator/supplier of the shingles for processing is limited to Filotto Roofing & Siding, 2111 Oakland Ave, Crest Hill, Illinois 60403. Before receiving shingles from a supplier, Black Dog Petroleum, LLC must document that the supplier has completed an affidavit attesting that they have completed the supplier training outlined in the application Log No. BUD11-013-R2. Additional suppliers/generator may be authorized under this BUD if the supplier/generator completes the supplier training outlined in this approval and signs an affidavit and/or Supply Certification Form attesting that they will supply shingles to Romeoville RAS Recycling Facility, 5 South Material Road, Romeoville, Illinois 60446 in accordance with the training outline in the BUD application Log No. BUD 11-013-R2. A copy of the affidavit must be included in the operating record and made available to the Illinois EPA or their designee through intergovernmental agreement upon request during normal business hours.
New	9/25/2023	BUD Condition	BUD11-013-R2 / Condition 16: No shingle material shall be received from a source other than Filotto Roofing & Siding, 2111 Oakland Ave, Crest Hill, Illinois 60403, except as allowed by Condition 13.

### ***Attachment Listing***

<b>Type</b>	<b>Description</b>
Letter	Attachment A2 - Document contains an air exposure assessment, survey of the unprocessed material pile, and explanation of 7052-ton discrepancy.
Miscellaneous	Attachment B2 - End user affidavit for Orange Crush LLC.
Miscellaneous	Attachment C2 - Supply certification form for S&S Builders.
Miscellaneous	Attachment D2 - Grinding schedule for Southwind RAS LLC.
Email	Attachment E2 - Email correspondence.

## Site Diagram



Digital Photographs



Bureau ID: 1970905199  
Photo No.: 1  
Photo Date: 9/25/2023  
Photo Time: 10:52:25 AM  
Direction: Northwest  
Taken By: Jose Loeza

Pile of processed material.



Bureau ID: 1970905199  
Photo No.: 2  
Photo Date: 9/25/2023  
Photo Time: 10:39:37 AM  
Direction: Northwest  
Taken By: Jose Loeza

Pile of processed material.





Bureau ID: 1970905199  
Photo No.: 3  
Photo Date: 9/25/2023  
Photo Time: 10:39:49 AM  
Direction: North  
Taken By: Jose Loeza

South face of unprocessed material pile.



Bureau ID: 1970905199  
Photo No.: 4  
Photo Date: 9/25/2023  
Photo Time: 10:42:35 AM  
Direction: Southeast  
Taken By: Jose Loeza

General refuse container.



Bureau ID: 1970905199  
Photo No.: 5  
Photo Date: 9/25/2023  
Photo Time: 10:44:05 AM  
Direction: Southeast  
Taken By: Jose Loeza

West face of unprocessed material pile.



Bureau ID: 1970905199  
Photo No.: 6  
Photo Date: 9/25/2023  
Photo Time: 10:46:20 AM  
Direction: Southwest  
Taken By: Jose Loeza

East face of unprocessed material pile.





Bureau ID: 1970905199

Photo No.: 7

Photo Date: 9/25/2023

Photo Time: 10:47:58 AM

Direction: West

Taken By: Jose Loeza

Ponding water at the southeast face of unprocessed material pile.



Bureau ID: 1970905199

Photo No.: 8

Photo Date: 9/25/2023

Photo Time: 10:48:21 AM

Direction: West

Taken By: Jose Loeza

Ponding water at the southeast face of unprocessed material pile.



Bureau ID: 1970905199

Photo No.: 8

Photo Date: 9/25/2023

Photo Time: 10:48:21 AM

Direction: West

Taken By: Jose Loeza

Ponding water at the southeast face of  
unprocessed material pile.







# Southwind RAS, LLC

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December 19, 2024

Mr. Rich Kim  
Assistant Counsel, Division of Legal Counsel  
Illinois Environmental Protection Agency  
1021 North Grand Avenue East  
Springfield, IL 62794

Re: NITPLA for Violation Notice L-2023-00094  
BOL No. 1970905199 - Will County  
Romeoville/Southwind RAS, LLC  
21-Day Response Letter

Dear Mr. Kim:

The purpose of this letter is to provide a written response on behalf of Southwind RAS, LLC (Southwind) to the above referenced Notice of Intent to Pursue Legal Action (NITPLA) for Violation Notice L-2023-00094, which is submitted within 21 days of our November 21, 2024, NITPLA meeting, pursuant to Section 31(a)(5) of the Illinois Environmental Protection Act ("Act"), 415 ILCS 5/31(a)(5). Southwind is appreciative of the opportunity to have met with the IEPA to discuss the matter further.

This letter serves as Southwind's additional response to the NITPLA and is submitted within 21 days following the NITPLA meeting. This letter includes a summary of the discussion during the NITPLA meeting as well as additional follow-up information that became relevant during that discussion.

## **I. Compliance with Executed Compliance Commitment Agreement**

In a letter dated August 30, 2023, the Illinois EPA transmitted to Southwind a fully executed copy of a Compliance Commitment Agreement ("CCA") resolving the allegations included in the above-referenced VN. That CCA contained five actions to be taken by Southwind by September 1, 2023, including:

- a) Schedule an asbestos exposure assessment during grinding operations and submit a copy of the report to the Agency;
- b) Submit samples of shingles to an NIST accredited lab for testing;
- c) Maintain an electronic operating record that includes certain specified information;
- d) Survey the piles of RAS material to determine size and weight, to be conducted by an independent surveyor/P.E./P.G.; and
- e) Submit a report to Illinois EPA explaining the 7052-ton discrepancy which appeared in the tonnage summaries.

During the November 21, 2024, NITPLA meeting, Southwind indicated that it had met all of these conditions by the date included in the CCA, and legal counsel for the Illinois EPA confirmed with staff at that time that this was in fact true. Two items, however, necessitated further discussion, and those discussions are detailed below.

## **II. Additional Discussion at November 21 Meeting**

In the survey performed by the independent party as required by the executed CCA, Southwind learned of a significant discrepancy between the tons of RAS present at the site as determined by the inbound and outbound tickets maintained by Southwind, compared to the tons of RAS present as determined by the survey. This discrepancy led Southwind to immediately take a number of steps to confirm the accuracy of and reasons for that discrepancy, to ensure that such a discrepancy would not occur in the future, and to remove a number of tons to ensure a return back to compliance with the tonnage allowed by its approved Beneficial Use Determination, which is 38,497 tons.

### **A. Steps Taken After the Survey Results were Obtained**

Upon completion of an internal audit to identify the cause of the discrepancy, Southwind discovered that there were several years at the beginning of the site's operation (years 2011-2014) where tickets were not kept, resulting in a significant number of tons which were not recorded in the site's total volume. While Southwind is still unclear why those tickets were not recorded, it is possible that it is due in part to the site transitioning to a new ticketing system during that same period of time. Southwind also reviewed internal engineering survey information and historical aerials to determine that a discrepancy was present, which also indicated that certain shingles received between 2011-2014 were not properly ticketed. In any event, our audit was able to determine that approximately 24,513 tons went unrecorded, which explains a substantial portion of the difference between the ticketed volume (24,892 tons) and the independent survey amount (55,061 tons).

### **B. Steps Taken to Ensure Proper Recordkeeping is Conducted**

Southwind has taken some post-audit preventative measures to ensure proper recordkeeping is conducted going forward. First, additional site-specific training for operations and scale personnel was completed. As part of this training, Southwind RAS developed a new on-site operating record system in the form of a hard-copy binder with all required documentation retained at the physical office location. This operating record keeps track of Supply Certification Forms (SCF) for each inbound customer and is the only way for the trained scale ticket writer to issue a ticket for the load. A similar process is in place for the outbound customer; the trained scale ticket writer will not be able to issue a ticket from the computer system unless the customer has a completed affidavit on file.

Further, on a monthly basis, site records will be audited by a dedicated, new staff person (within the Environmental Services Department) assigned specifically for the purpose of confirming compliance with the documentation requirements outlined in the BUD. It is important to note that the audit will be completed by the Environmental Services Department, which operates as a separate function from the Operations Department. The independent audit component of this revised process will allow the Operations Department to be held accountable by the Environmental Services Department, which will assist in ensuring full compliance going forward.

### **C. Steps Taken to Return to Compliance with the Market Cap**

Southwind understands the importance of managing its current inventory of shingles on-site in order to return to compliance with the market cap, as quickly as possible, and has taken two immediate steps to begin this reduction.

First, given that the site's current inventory remains above its market cap limit, Southwind closed the facility on November 27, 2024 to inbound shipments and has not accepted any shingles since this date. Southwind remains committed to operating within the requirements set forth in the BUD and will re-evaluate the need to open the site again once the facility's volume of shingles no longer exceeds the market cap limit.

Second, Southwind has prepared a new BUD application that seeks to blend RAS with reclaimed asphalt pavement (RAP) and construction aggregates. This new blend would be used on currently unpaved rural roadways (i.e. township / county highways) for the purposes of dust control and road stabilization,. Southwind is petitioning to allow for an additional end use of RAS/crushed coarse aggregate blend in applications where the mixture is used as part of private pavement or structure developments in accordance with designs and specifications approved by an Illinois Licensed Professional Engineer. This process, which includes the same materials used in typical asphalt production, would reduce construction costs of private aggregate pavement and structural developments by using recycled materials versus virgin materials. Additional benefits may include greater permeability of pavement, if needed.

With respect to anticipated future RAS usage, Southwind has secured purchase orders for several near-term projects while also awaiting finalized negotiations on several larger scale projects slated for 2025, as listed below.:

- Sales Purchase Order – D Construction (800 tons) – By End of 2024
- Sales Purchase Order – K Five Construction (1,000 tons) – By End of 2024
- Romeoville Roadway Repair – (1,500 tons) – 2Q - 2025
- Romeoville Parking Lot Development Project – (15,000 tons) – Awaiting Purchase Order / Project Approval
- **TOTAL TONNAGE – 18,300 tons**

By closing the site to new inbound shipments and scheduling the aforementioned outbound shipments, Southwind will be able to return to compliance with the market cap contained in the BUD shortly. Further, Southwind continues to evaluate additional projects and opportunities where RAS may be used in various applications similar to the above project list. Southwind can provide additional updates to the Agency as these projects begin or reach completion.

### **III. Additional Information**

Enclosed with this letter are copies of asbestos exposure assessments completed by an independent, third-party consultant during grinding operations at the Romeoville facility. The 2023 employee asbestos exposure assessment was completed on August 23, 2023, and the 2024 assessment was completed on November 27, 2024. The exposure assessment narrative clearly describes that the monitoring results are representative of site conditions during grinding or chopping activities.



The results of the air monitoring were compared to the applicable and relevant OSHA exposure limits for this specific media and there were no detections or exceedances above either the OSHA Permissible Exposure Limit (PEL) (measured as a time-weighted average over eight-hours) or the Excursion Limit (calculated over a thirty-minute period).

#### **IV. Conclusion**

Thank you for the opportunity to meet and discuss this matter further and provide additional information to address the concerns outlined above. As always, Southwind RAS welcomes the opportunity to explore all matters related to its facility's operations at your convenience. Should you have any questions, please do not hesitate to contact me directly at 630.940.5789 or JoshQ@grp7.com.

Sincerely,

**SOUTHWIND RAS, LLC**



Josh Quinn

Director of Safety, Environmental Services & Compliance

**ATTACHMENT A: 2023 / 2024 ASBESTOS EXPOSURE ASSESSMENT REPORTS**



## INDUSTRIAL HYGIENE MONITORING

Southwind RAS Facility – Romeoville  
Route 7 / Route 53  
Romeoville, Illinois 60446

### Prepared for:

Southwind RAS, LLC  
2250 Southwind Boulevard  
Bartlett, IL 60103

### Prepared by:

True North Consultants, Inc.  
1000 E. Warrenville Road, Ste. 140  
Naperville, IL 60563

Phone: 630.717.2880

Date: December 2, 2024

Project Number: T243760



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## LIST OF APPENDICES

- Appendix A     IH Survey Data Sheet
- Appendix B     Laboratory Analytical Report



## 1.0 INTRODUCTION

### 1.1. General

True North Consultants, Inc. (True North) was retained by Southwind RAS, LLC to conduct personal exposure monitoring during asphalt shingle recycling operations performed at the Romeoville RAS Facility located near the DRP Bridge at Route 7 and Route 53 in Romeoville, Illinois (Site). Monitoring was conducted over a period of one (1) work shift on November 27, 2024, by a qualified Industrial Hygienist.

### 1.2. Purpose

The purpose of the study was to ascertain the concentrations of airborne "asbestos" fibers to which workers may be exposed in relation to the Occupational Safety and Health Administration (OSHA) Permissible Exposure Limit (PEL) and Excursion Limit (EL). The results of the study were used to assess overall compliance with applicable exposure limits and to assess the appropriate level of respiratory protection and/or additional engineering and work practice controls necessary to protect employees from hazardous concentrations of airborne contaminants.

### 1.3. Scope of Services

True North provided a qualified industrial hygienist to conduct air monitoring during asphalt shingle recycling operations where the potential for occupational exposure to the contaminants of concern exists. The scope of monitoring consisted of personal exposure monitoring for airborne "asbestos" fibers. Air monitoring was performed for each work classification where the potential for occupational exposure to contaminants of concern exists. At the completion of monitoring, collected samples were analyzed by True North's AIHA proficiency analytical testing (PAT) program participating laboratory (AIHA Laboratory No. PAT-207437). Results of analysis have been summarized within this narrative report along with a summary of methods, findings, and conclusions.

## 2.0 METHODOLOGY

### 2.1. Sampling Methodology

Exposure monitoring was performed to evaluate the concentrations of airborne "asbestos" fibers to which workers may be exposed during asphalt shingle recycling operations. Upon arriving on site, the industrial hygienist developed a sampling plan based upon the scope of work to obtain an overall representation of employee exposure. Airborne "asbestos" fiber monitoring was conducted in accordance with National Institute for Occupational Safety and Health (NIOSH) Method 7400.

Personal exposure monitoring was performed utilizing Gillian brand low flow sampling pumps calibrated at a flow rate of 2.0 liters per minute for airborne "asbestos" fibers. Airborne "asbestos" fiber samples were collected by drawing a known volume of air through a 25mm mixed cellulose ester (MCE) filter (0.8 micron pore size). Each sampling pump was calibrated at the appropriate flow rate prior to initiating monitoring utilizing a TSI Model-4100 Primary Calibrator. The personal pumps were then attached to the workers with the sampling media placed within the workers breathing zone. Each pump was placed in operation mode at which point sample collection was initiated.



The pumps were maintained in operation for the duration of the sampling period during which time work operations were periodically observed and information regarding site conditions, work practices and engineering controls were recorded for data interpretation purposes. At the conclusion of sampling, flow rates were verified, volumes were recorded, and sampling pumps were turned off. A total of two (2) field blanks were collected with each sample set for quality control purposes. The samples were then containerized and sample information was recorded.

## 2.2. Analytical Methodology

Upon completion of sampling, airborne "asbestos" fiber samples were analyzed by True North's AIHA proficiency analytical testing (PAT) program participating laboratory (AIHA Laboratory No. PAT-207437). Air sample analysis was performed by Phase Contrast Microscopy (PCM) utilizing NIOSH Method 7400 "A" Counting Rules. PCM analysis counts all fibers measuring greater than or equal to 5 micrometers in length, with a length to width aspect ratio of 3:1. The PCM method quantifies all type of fibers and does not specifically identify "asbestos" fibers. Because the specific content is not identified, it should be noted that identified fibers may also include particulate from sources other than asbestos including fibrous glass, paper, gypsum, rock wool, etc. Copies of laboratory analytical reports and chain-of-custody records are provided within **Appendix B** of this report.

## 3.0 FINDINGS

### 3.1. General Observations

The Site addressed during this project consists of the Southwind RAS asphalt shingle recycling operation located in Romeoville, Illinois. The work activities performed at the Site consisted of the recycling of asphalt roofing shingles for the purposes of beneficial reuse. Recyclable roofing shingles are delivered to the Site and stockpiled for sorting and processing. Monitored workers consisted of one (1) wheel loader operator and one (1) ticket writer. The wheel loader operator performed material offloading, stockpiling activities, and loading the grinder (Equipment Model: B66 Rotochopper – Unit No. 32007) to process or chop/size shingle materials. The ticket writer performed truck weighing and ticketing activities. The operation is typically performed on a daily basis for the duration of a standard eight-hour work shift. Work operations were performed for the duration of the work shift with the exception of scheduled breaks and time associated with material handling and staging activities. The employees operating wheel loaders were equipped with a hard hats, safety glasses, and safety boots for the duration of work activities.

### 3.2. Summary of Results

Exposure monitoring was performed to assess the concentrations of airborne "asbestos" fibers generated during asphalt shingle recycling operations. Results of airborne "asbestos" fiber monitoring were reported in fibers per cubic centimeter (f/cc) of air. For each sample, The Permissible Exposure Limit (PEL) was established, and the Time-Weighted Average (TWA) was calculated. The results of analysis were then compared to the PEL in order to determine regulatory compliance and the degree of health risk to the worker. The following table summarizes the results of monitoring in relation to applicable exposure limits:





Table 1: Exposure Monitoring Results

Sample Description	Sample ID	Contaminant	Concentration	Exposure Limit(s)
Jose Ruiz – Wheel Loader Operator	EX-1127-01	Airborne Asbestos Fibers – Excursion Sample	< 0.045 f/cc (EL)	1.0 f/cc (EL)
	P-1127-01	Airborne Asbestos Fibers – Personal Sample	0.009 f/cc	0.1 f/cc (PEL)
	N/A	Airborne Asbestos Fibers - Calculated 8-Hr TWA	0.012 f/cc (TWA)	0.1 f/cc (PEL)
Consuela Mandujano – Ticket Writer	EX-1127-02	Airborne Asbestos Fibers – Excursion Sample	< 0.045 f/cc (EL)	1.0 f/cc (EL)
	P-1127-02	Airborne Asbestos Fibers – Personal Sample	0.006 f/cc	0.1 f/cc (PEL)
	N/A	Airborne Asbestos Fibers - Calculated 8-Hr TWA	0.008 f/cc (TWA)	0.1 f/cc (PEL)

## Notes:

- (1) If concentrations of contaminants during non-monitored periods are consistent with those present during monitored periods, it is recommended that the reported concentrations (Excursion & Personal Sample) be utilized in lieu of the calculated 8-hour TWA value where applicable.
- (2) Copies of laboratory analytical reports are provided in Appendix B of this report.

## 4.0 DISCUSSION

### 4.1. General

The term asbestos refers to a set of six naturally occurring fibrous silicate minerals. Due to the desirable physical and chemical properties of these minerals, asbestos minerals were commonly used in the manufacture of a wide variety of building materials including pipe insulation, spray-on fireproofing, acoustical ceiling tile, vinyl composition floor tile, drywall, and roofing materials. These “asbestiform” minerals are composed of microscopic fibrils that can become airborne if disturbed and may enter the deepest recesses of the lungs. Exposure to airborne asbestos fibers may result in serious and fatal illnesses including lung cancer, mesothelioma, and asbestosis.

Due to the toxicity of the aforementioned compound, OSHA has published occupational exposure limits for exposure to this compound including the Permissible Exposure Limit (PEL) measured as an eight-hour time weighed average (TWA), and the Excursion Limit (EL) calculated over a thirty-minute sampling period. The “Permissible Exposure Limit” represents the exposure level above which no employees may be exposed to under normal workplace conditions. The “Excursion Limit” represents the concentration of contaminants for which no worker shall be exposed for more than thirty minutes during a workday. The Eight-Hour Time-Weighted Average (8-Hour TWA) refers to the maximum average levels that an employee may be exposed to over the duration of an eight-hour shift.

### 4.2. Findings

The results of air monitoring for contaminants of concern were compared to the relevant OSHA exposure limits. Results of airborne “asbestos” fiber sampling are generally compared to the OSHA PEL of 0.1 f/cc calculated as an 8-hour TWA and the OSHA EL of 1.0 f/cc calculated over a thirty-minute sampling period.



The results of monitoring in relation to the applicable exposure limits are provided as follows:

- Airborne “asbestos” fiber concentrations for full shift personal exposure monitoring (8-hour TWA) were determined to range between 0.008 f/cc and 0.012 f/cc. This result indicates exposure to be less than the OSHA PEL of 0.1 f/cc. The results of thirty-minute sampling were determined to be less than the OSHA EL of 1.0 f/cc.

## 5.0 CONCLUSIONS

Based upon the results of analysis, concentrations of airborne “asbestos” fibers were not detected above the OSHA PEL or EL. In accordance with OSHA requirements, for all workplaces where employee exposure to airborne contaminants exceeds the permissible exposure limit, the employer shall either eliminate the hazard or seek the best possible permanent solution available including the implementation of engineering and work practice controls, or administrative controls, to reduce and maintain employee exposure to or below the permissible exposure limit to the extent that such controls are feasible.

In that concentrations of airborne “asbestos” fibers were determined to be less than the applicable exposure limits, it appears that existing work practices and engineering controls are sufficient to maintain occupational exposure to within acceptable limits.

For specific information regarding dates, locations, or results of monitoring, please refer to the Appendices of this report. This documentation should be maintained for a period of thirty years.

## 6.0 GENERAL REMARKS

Due to the fact that relative concentrations of contaminants may vary based upon changes in material composition, work practices, environmental conditions, and/or engineering controls, any future changes to these parameters should be evaluated to assess their overall impact on employee exposure. Should conditions change that may result in the additional generation of contaminants, additional monitoring is recommended to assess the potential impact of these changes on employee exposure.

Locations and intervals of monitoring have been determined based upon the scope of work, and/or the discretion of the client’s representatives. The services performed by the environmental scientists on this project have been conducted with that level of care and skill ordinarily exercised by reputable members of the profession, practicing in the same locality, under similar budget and time constraints. No warranty is made or intended.



APPENDIX A  
IH Survey Data Sheets



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Client Name: Southwind RAS, LLC

Site Name: Romeoville RAS Facility

Project Number: T243760

## INDUSTRIAL HYGIENE SURVEY DATA SHEET

Site: Southwind RAS - Romeoville, Illinois

Sample Date: November 27, 2024

Location: Route 7 / Route 53, Romeoville, Illinois

Work Activity: Shingle Processing &amp; Ticket Writing

Job Description: Personal Exposure Monitoring

Shift:	1. Day	Frequency of Operation	1. Daily	2. 2-3/wk	3. Weekly	4. 2-3/mo	Duration of Operation	1. 0-15 min	2. 15-30 min	3. 30-60 min	4. 1-2 hr
2. Eve.	3. Night	5. Monthly	6. 2-3/yr	7. Yearly	8. Special		5. 2-4 hr	6. 4-6 hr	7. 6-8 hr	8. > 8 hr	

## WORK ACTIVITIES:

The operation consisted of one (1) wheel loader operator and one (1) ticket writer. The wheel loader operator performed material offloading, stockpiling activities, and loading the grinder (Equipment Model: B66 Rotochopper – Unit No. 32007) to process or chop/size shingle materials. The ticket writer remained in the entrance trailer for the entirety of the shift, weighing and checking in and out trucks. Another wheel loader operator was present on-site loading finished materials into large trucks which were hauled offsite, however was not subject to monitoring.

## ENGINEERING CONTROLS:

Work was performed in an open-air environment.

## PPE DESCRIPTION:

Hard Hat, Safety Boots, Safety Glasses.

Sample #	Sample Time			Flow Rate			Sample Volume	Sample Description	Analyte
	Start	Stop	Total	Start	Stop	Avg.			
EX-1127-01	6:11 AM	6:41 AM	30 mins	2.0 L/min	2.0 L/min	2.0 L/min	60 L	Excursion – Jose Carrillo – Wheel Loader Operator	Airborne Asbestos Fibers
P-1127-01	6:42 AM	2:41 PM	479 mins	2.0 L/min	2.0 L/min	2.0 L/min	958 L	Personal – Jose Carrillo – Wheel Loader Operator	Airborne Asbestos Fibers
EX-1127-02	7:04 AM	7:34 AM	30 mins	2.0 L/min	2.0 L/min	2.0 L/min	60 L	Excursion – Consuelo Mandujano – Ticket Writer	Airborne Asbestos Fibers
P-1127-02	7:35 AM	2:58 PM	443 mins	2.0 L/min	2.0 L/min	2.0 L/min	886 L	Personal – Consuelo Mandujano – Ticket Writer	Airborne Asbestos Fibers

Exposure during the unsampled period is: ☐ Same as sample period ☒ Zero ☐ Other \_\_\_\_\_

## NOTES:

True North arrived on site at 5:50 AM and met with the client to discuss the day's work activities. The operation consisted of two (2) wheel loader operators and one (1) ticket writer. Prior to beginning work activities, True North calibrated all air pumps. Pumps were then affixed to each worker and sampling began around 6:10 AM. Throughout the shift, True North periodically checked the pumps to ensure they were functioning properly. At the completion of the shift, air pumps were stopped, and samples were collected. All air pumps were post calibrated and sampling data was recorded. True North left the site at 3:00 PM.

Sampling IH: John Kulla

Date Completed: 11/27/2024

\* BY MY SIGNATURE, I VERIFY THAT INFORMATION DETAILED ON THIS FORM IS COMPLETE AND ACCURATE TO THE BEST OF MY KNOWLEDGE.

Signature: John Kulla

Date Signed: 11/27/2024



APPENDIX B

Laboratory Analytical Reports

## AIR SAMPLING DATA SHEET PHASE CONTRAST MICROSCOPY (PCM)

CLIENT: Southwind RAS, LLC  
 SITE NAME: Southwind RAS, LLC - Romeoville, IL  
 PROJECT NAME: Industrial Hygiene Monitoring

DATE: 11/27/2024  
 PROJECT No: T243760  
 DAY/SHIFT: 1/1

SAMPLED BY: John Kulla  
 ANALYZED BY: John Kulla  
 ANALYZED AT: Laboratory

Magnification	400	0.00785	Field Area
Fld. Diameter	100 um	0.2	C.V.
Phase Test	X	385	EFA

SAMPLE NUMBER	SAMPLE DESCRIPTION		SAMPLE TYPE	TIME		TOTAL TIME (MIN.)	FLOW RATE (LITERS PER MIN.)			SAMPLE VOLUME (LITERS)	FIBERS	FIELDS	FIBERS / MM <sup>2</sup>	FIBERS / CC
	ACTIVITY	SAMPLE LOCATION AND/OR EMPLOYEE NAME, DESCRIPTION OF WORK ACTIVITY		START	STOP		START	END	AVERAGE					
BLNK-01	N/A	Field Blank	FB	N/A	N/A	N/A	N/A	N/A	N/A	N/A	< 5.5	100	< 7.0	N/A
BLNK-02	N/A	Field Blank	FB	N/A	N/A	N/A	N/A	N/A	N/A	N/A	< 5.5	100	< 7.0	N/A
EX-1127-01	N/A	Jose Carrillo - Wheel Loader Operator	EX	6:11 AM	6:41 AM	30	2.0	2.0	2.0	60	< 5.5	100	< 7.0	< 0.045
P-1127-01	N/A	Jose Carrillo - Wheel Loader Operator	PRS	6:42 AM	2:41 PM	479	2.0	2.0	2.0	958	18	100	22.9	0.009
EX-1127-02	N/A	Consuelo Mandujano - Ticket Writer	EX	7:04 AM	7:34 AM	30	2.0	2.0	2.0	60	< 5.5	100	< 7.0	< 0.045
P-1127-02	N/A	Consuelo Mandujano - Ticket Writer	PRS	7:35 AM	2:58 PM	443	2.0	2.0	2.0	886	11	100	14.0	0.006

Analyst: John Kulla (IDPH No. 100-20085)

- 1). PCM Air Samples are Analyzed by NIOSH Method 7400 "A" Counting Rules.
- 2). The Limit of Detection is 7.0 f/mm<sup>2</sup> (cLOD=Less than the Limit of Detection).
- 3). The OSHA PEL is 0.1 f/cc and the excursion limit is 1.0 f/cc.
- 4). The required Clearance Level is 0.01 f/cc in the State of Illinois.
- 5). The EPA recommended Clearance Level is 0.01 f/cc.

8 HOUR TIME-WEIGHTED AVERAGE								
RESP. TYPE	EMPLOYEE NAME	T1	C1	T2	C2	T3	C3	TWA (f/cc)
N/A	Jose Carrillo	30	< 0.045	479	0.009			0.012
N/A	Consuelo Mandujano	30	< 0.045	443	0.006			0.008

ACTIVITY  
 PREP - Site Preparation  
 REM - Gross Removal  
 GLBG - Glovebag Removal  
 CLN - Cleaning  
 O&M - Patch & Repair  
 NF - Non-Friable Removal

SAMPLE TYPE  
 BK - Background  
 PRS - Personal  
 EX - Excursion  
 CL - Clearance  
 ENV - Environmental  
 IC - Inside Containment  
 OC - Outside Containment  
 FB - Field Blank

RESPIRATOR TYPE  
 APR - Air Purifying Respirator  
 PAPR - Powered Air Purifying Respirator  
 SA - Supplied Air  
 N/A - None





## INDUSTRIAL HYGIENE MONITORING

Southwind RAS Facility – Romeoville  
Route 7/Route 53  
Romeoville, Illinois 60446

### Prepared for:

Southwind RAS, LLC  
2250 Southwind Boulevard  
Bartlett, IL 60103

### Prepared by:

True North Consultants, Inc.  
1000 E. Warrenville Road, Ste. 140  
Naperville, IL 60563

Phone: 630.717.2880

Date: September 5, 2023

Project Number: T231793.04



1000 E. Warrenville Road, Suite 140  
Naperville, IL 60563

O: 630.717.2880  
F: 630.689.5881

[ConsultTrueNorth.com](http://ConsultTrueNorth.com)

November 27, 2024

Josh Quinn  
Southwind RAS, LLC  
2250 Southwind Boulevard  
Bartlett, Illinois 60103

**Subject: Addendum – 2023 Industrial Hygiene Monitoring Report  
Southwind RAS Facility  
Route 7 and Route 53, Romeoville, Illinois**

Dear Mr. Quinn:

True North Consultants Inc. (True North) was retained by Southwind RAS, LLC (Client) on August 23, 2023, to conduct personal exposure monitoring during asphalt shingle recycling operations at the Romeoville RAS Facility, located near the DRP Bridge at Route 7 and Route 53 in Romeoville, Illinois (Site). To address the need for greater specificity in the 2023 Industrial Hygiene Monitoring Report dated September 5, 2023, True North is issuing this addendum to revise the identification of equipment used at the Site and clarify the scope of activities assessed during the monitoring period. This addendum is intended to ensure the report's accuracy and compliance with regulatory requirements.

In **Section 3.1 (General Observations)** of the report, the phrase "loading a screener machine to separate shingle materials" was used to describe the wheel loader operator's job activities. This statement should read: "loading the grinder (Equipment Model: B66 Rotochopper – Unit No. 32007) to process or chop/size shingle materials." Additionally, all references to "screener" in this section and within the Industrial Hygiene Survey Data Sheet (under Work Activities) should be replaced with "grinder." These revisions provide greater clarity by accurately specifying the equipment utilized at the Site and operations assessed during grinding activities performed by the wheel loader operator, demonstrating compliance with exposure assessment protocols.

Please reference this addendum in conjunction with the original report for all compliance and review purposes. If you have any questions or require further assistance, please contact True North at your convenience.

Sincerely,  
**TRUE NORTH CONSULTANTS**

A handwritten signature in black ink, appearing to read "Brian S. Mihelich".

Brian S. Mihelich  
Executive Vice President



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## LIST OF APPENDICES

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## 1.0 INTRODUCTION

### 1.1. General

True North Consultants, Inc. (True North) was retained by Southwind RAS, LLC to conduct personal exposure monitoring during asphalt shingle recycling operations performed at the Romeoville RAS Facility located near the DRP Bridge at Route 7 and Route 53 in Romeoville, Illinois (Site). Monitoring was conducted over a period of one (1) work shift on August 23, 2023, by a qualified Industrial Hygienist.

### 1.2. Purpose

The purpose of the study was to ascertain the concentrations of airborne “asbestos” fibers to which workers may be exposed in relation to the Occupational Safety and Health Administration (OSHA) Permissible Exposure Limit (PEL) and Excursion Limit (EL). The results of the study were used to assess overall compliance with applicable exposure limits and to assess the appropriate level of respiratory protection and/or additional engineering and work practice controls necessary to protect employees from hazardous concentrations of airborne contaminants.

### 1.3. Scope of Services

True North provided a qualified industrial hygienist to conduct air monitoring during asphalt shingle recycling operations where the potential for occupational exposure to the contaminants of concern exists. The scope of monitoring consisted of personal exposure monitoring for airborne “asbestos” fibers. Air monitoring was performed for each work classification where the potential for occupational exposure to contaminants of concern exists. At the completion of monitoring, collected samples were analyzed by True North’s AIHA proficiency analytical testing (PAT) program participating laboratory (AIHA Laboratory No. PAT-207437). Results of analysis have been summarized within this narrative report along with a summary of methods, findings, and conclusions.

## 2.0 METHODOLOGY

### 2.1. Sampling Methodology

Exposure monitoring was performed to evaluate the concentrations of airborne “asbestos” fibers to which workers may be exposed during asphalt shingle recycling operations. Upon arriving on site, the industrial hygienist developed a sampling plan based upon the scope of work to obtain an overall representation of employee exposure. Airborne “asbestos” fiber monitoring was conducted in accordance with National Institute for Occupational Safety and Health (NIOSH) Method 7400.

Personal exposure monitoring was performed utilizing Gillian brand low flow sampling pumps calibrated at a flow rate of 2.0 liters per minute for airborne “asbestos” fibers. Airborne “asbestos” fiber samples were collected by drawing a known volume of air through a 25mm mixed cellulose ester (MCE) filter (0.8 micron pore size). Each sampling pump was calibrated at the appropriate flow rate prior to initiating monitoring utilizing a TSI Model-4100 Primary Calibrator. The personal pumps were then attached to the workers with the sampling media placed within the workers breathing zone. Each pump was placed in operation mode at which point sample collection was initiated.



The pumps were maintained in operation for the duration of the sampling period during which time work operations were periodically observed and information regarding site conditions, work practices and engineering controls were recorded for data interpretation purposes. At the conclusion of sampling, flow rates were verified, volumes were recorded, and sampling pumps were turned off. A total of two (2) field blanks were collected with each sample set for quality control purposes. The samples were then containerized and sample information was recorded.

## 2.2. Analytical Methodology

Upon completion of sampling, airborne “asbestos” fiber samples were analyzed by True North’s AIHA proficiency analytical testing (PAT) program participating laboratory (AIHA Laboratory No. PAT-207437). Air sample analysis was performed by Phase Contrast Microscopy (PCM) utilizing NIOSH Method 7400 “A” Counting Rules. PCM analysis counts all fibers measuring greater than or equal to 5 micrometers in length, with a length to width aspect ratio of 3:1. The PCM method quantifies all type of fibers and does not specifically identify “asbestos” fibers. Because the specific content is not identified, it should be noted that identified fibers may also include particulate from sources other than asbestos including fibrous glass, paper, gypsum, rock wool, etc. Copies of laboratory analytical reports and chain-of-custody records are provided within **Appendix B** of this report.

## 3.0 FINDINGS

### 3.1. General Observations

The Site addressed during this project consists of the Southwind RAS asphalt shingle recycling operation located in Romeoville, Illinois. The work activities performed at the Site consisted of the recycling of asphalt roofing shingles for the purposes of beneficial reuse. Recyclable roofing shingles are delivered to the Site and stockpiled for sorting and processing. Work activities performed on the day of monitoring consisted of one (1) employee operating a wheel loader and Skid Steer, performing material offloading, stockpiling activities, and loading the screener machine to separate shingle materials, one (1) employee operating a wheel loader, performing material offloading and stockpiling materials filtered through the screener, and one (1) employee performing truck weighing and ticketing activities. The operation is typically performed on a daily basis for the duration of a standard eight-hour work shift. Work operations were performed for the duration of the work shift with the exception of scheduled breaks and time associated with material handling and staging activities. The employees operating wheel loaders were equipped with a hard hats, safety glasses, and safety boots for the duration of work activities.

### 3.2. Summary of Results

Exposure monitoring was performed to assess the concentrations of airborne “asbestos” fibers generated during asphalt shingle recycling operations. Results of airborne “asbestos” fiber monitoring were reported in fibers per cubic centimeter (f/cc) of air. For each sample, The Permissible Exposure Limit (PEL) was established, and the Time-Weighted Average (TWA) was calculated. The results of analysis were then compared to the PEL in order to determine regulatory compliance and the degree of health risk to the worker. The following table summarizes the results of monitoring in relation to applicable exposure limits:





Table 1: Exposure Monitoring Results

Sample Description	Sample ID	Contaminant	Concentration	Exposure Limit(s)
Tomas Gonzalez – Wheel Loader Operator	A-0823-EX1	Airborne Asbestos Fibers – Excursion Sample	< 0.045 f/cc (EL)	1.0 f/cc (EL)
	A-0823-PRS1	Airborne Asbestos Fibers – Personal Sample	< 0.003 f/cc	0.1 f/cc (PEL)
	N/A	Airborne Asbestos Fibers - Calculated 8-Hr TWA	< 0.006 f/cc (TWA)	0.1 f/cc (PEL)
Francisco Chavez – Wheel Loader / Skid Steer Operator	A-0823-EX2	Airborne Asbestos Fibers – Excursion Sample	< 0.045 f/cc (EL)	1.0 f/cc (EL)
	A-0823-PRS2	Airborne Asbestos Fibers – Personal Sample	< 0.003 f/cc	0.1 f/cc (PEL)
	N/A	Airborne Asbestos Fibers - Calculated 8-Hr TWA	< 0.006 f/cc (TWA)	0.1 f/cc (PEL)
Consuela Mandujano – Ticket Writer	A-0823-EX3	Airborne Asbestos Fibers – Excursion Sample	< 0.045 f/cc (EL)	1.0 f/cc (EL)
	A-0823-PRS4	Airborne Asbestos Fibers – Personal Sample	< 0.004 f/cc	0.1 f/cc (PEL)
	N/A	Airborne Asbestos Fibers - Calculated 8-Hr TWA	< 0.006 f/cc (TWA)	0.1 f/cc (PEL)

## Notes:

- (1) If concentrations of contaminants during non-monitored periods are consistent with those present during monitored periods, it is recommended that the reported concentrations (Excursion & Personal Sample) be utilized in lieu of the calculated 8-hour TWA value where applicable.
- (2) Copies of laboratory analytical reports are provided in Appendix B of this report.

## 4.0 DISCUSSION

### 4.1. General

The term asbestos refers to a set of six naturally occurring fibrous silicate minerals. Due to the desirable physical and chemical properties of these minerals, asbestos minerals were commonly used in the manufacture of a wide variety of building materials including pipe insulation, spray-on fireproofing, acoustical ceiling tile, vinyl composition floor tile, drywall, and roofing materials. These “asbestiform” minerals are composed of microscopic fibrils that can become airborne if disturbed and may enter the deepest recesses of the lungs. Exposure to airborne asbestos fibers may result in serious and fatal illnesses including lung cancer, mesothelioma, and asbestosis.

Due to the toxicity of the aforementioned compound, OSHA has published occupational exposure limits for exposure to this compound including the Permissible Exposure Limit (PEL) measured as an eight-hour time weighed average (TWA), and the Excursion Limit (EL) calculated over a thirty-minute sampling period. The “Permissible Exposure Limit” represents the exposure level above which no employees may be exposed to under normal workplace conditions. The “Excursion Limit” represents the concentration of contaminants for which no worker shall be exposed for more than thirty minutes during a workday. The Eight-Hour Time-Weighted Average (8-Hour TWA) refers to the maximum average levels that an employee may be exposed to over the duration of an eight-hour shift.





## 4.2. Findings

The results of air monitoring for contaminants of concern were compared to the relevant OSHA exposure limits. Results of airborne “asbestos” fiber sampling are generally compared to the OSHA PEL of 0.1 f/cc calculated as an 8-hour TWA and the OSHA EL of 1.0 f/cc calculated over a thirty-minute sampling period.

The results of monitoring in relation to the applicable exposure limits are provided as follows:

- Airborne “asbestos” fiber concentrations for full shift personal exposure monitoring (8-hour TWA) were determined to be < 0.006 f/cc. This result indicates exposure to be less than the OSHA PEL of 0.1 f/cc. The results of thirty-minute sampling were determined to be less than the OSHA EL of 1.0 f/cc.

## 5.0 CONCLUSIONS

Based upon the results of analysis, concentrations of airborne “asbestos” fibers were not detected above the OSHA PEL or EL. In accordance with OSHA requirements, for all workplaces where employee exposure to airborne contaminants exceeds the permissible exposure limit, the employer shall either eliminate the hazard or seek the best possible permanent solution available including the implementation of engineering and work practice controls, or administrative controls, to reduce and maintain employee exposure to or below the permissible exposure limit to the extent that such controls are feasible.

In that the results of personal exposure monitoring were determined to be less than the applicable exposure limits, it appears that existing work practices and engineering controls are sufficient to maintain occupational exposure to within acceptable limits.

For specific information regarding dates, locations, or results of monitoring, please refer to the Appendices of this report. This documentation should be maintained for a period of thirty years.

## 6.0 GENERAL REMARKS

Due to the fact that relative concentrations of contaminants may vary based upon changes in material composition, work practices, environmental conditions, and/or engineering controls, any future changes to these parameters should be evaluated to assess their overall impact on employee exposure. Should conditions change that may result in the additional generation of contaminants, additional monitoring is recommended to assess the potential impact of these changes on employee exposure.

Locations and intervals of monitoring have been determined based upon the scope of work, and/or the discretion of the client's representatives. The services performed by the environmental scientists on this project have been conducted with that level of care and skill ordinarily exercised by reputable members of the profession, practicing in the same locality, under similar budget and time constraints. No warranty is made or intended.



APPENDIX A  
IH Survey Data Sheets



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Client Name: Southwind RAS, LLC

Site Name: Romeoville RAS Facility

Project Number: T231793.04

## INDUSTRIAL HYGIENE SURVEY DATA SHEET

Site: Southwind RAS - Romeoville, Illinois

Sample Date: August 23, 2023

Location: Route 7 / Route 53, Romeoville, Illinois

Work Activity: Shingle Stockpiling &amp; Ticket Writing

Job Description: Personal Exposure Monitoring

Shift:	1 Day	Frequency of Operation	1 Daily	2. 2-3/wk	3. Weekly	4. 2-3/mo	Duration of Operation	1. 0-15 min	2. 15-30 min	3. 30-60 min	4. 1-2 hr
2. Eve.	3. Night		5. Monthly	6. 2-3/yr	7. Yearly	8. Special		5. 2-4 hr	6. 4-6 hr	7. 6-8 hr	8. > 8 hr

## WORK ACTIVITIES:

The operation consisted of two (2) wheel loader operators and one (1) ticket writer. One operator (#2) was operating a wheel loader and Skid Steer, loading shingles into a materials screener. The other operator (#1) was in a wheel loader and would move and stockpile screened materials. Both operators would assist trucks in unloading materials dropped off. Operator work activities included generating shingle stockpiles for processing along with various other materials (wooden scrap) dropped off by trucks and pickups. The ticket writer remained in the entrance trailer for the entirety of the shift, weighing and checking in and out trucks.

## ENGINEERING CONTROLS:

Work performed in an open-air environment.

## PPE DESCRIPTION:

Hard Hat, Safety Boots, Safety Glasses.

Sample #	Sample Time			Flow Rate			Sample Volume	Sample Description	Analyte
	Start	Stop	Total	Start	Stop	Avg.			
A-0823-EX1	6:04 AM	6:34 AM	30 mins	2.0 L/min	2.0 L/min	2.0 L/min	60 L	Excursion - Tomas Gonzalez - Wheel Loader Operator	Airborne Asbestos Fibers
A-0823-PRS1	6:35 AM	1:57 PM	442 mins	2.0 L/min	2.0 L/min	2.0 L/min	884 L	Personal - Tomas Gonzalez - Wheel Loader Operator	Airborne Asbestos Fibers
A-0823-EX2	6:02 AM	6:32 AM	30 mins	2.0 L/min	2.0 L/min	2.0 L/min	60 L	Excursion - Francisco Chavez - Wheel Loader / Skid Steer Operator	Airborne Asbestos Fibers
A-0823-PRS2	6:33 AM	1:55 PM	442 mins	2.0 L/min	2.0 L/min	2.0 L/min	884 L	Personal - Francisco Chavez - Wheel Loader / Skid Steer Operator	Airborne Asbestos Fibers
A-0823-EX3	7:25 AM	7:55 PM	30 mins	2.0 L/min	2.0 L/min	2.0 L/min	60 L	Excursion - Consuela Mandujano - Ticket Writer	Airborne Asbestos Fibers
A-0823-PRS3	7:56 AM	1:59 PM	363 mins	2.0 L/min	2.0 L/min	2.0 L/min	726 L	Personal - Consuela Mandujano - Ticket Writer	Airborne Asbestos Fibers

Exposure during the unsampled period is: ☐ Same as sample period ☒ Zero ☐ Other \_\_\_\_\_

## NOTES:

True North arrived on site at 5:40 AM and met with client to discuss the day's work activities. The operation consisted of two (2) production operators and one (1) ticket writer. Prior to beginning work activities, True North calibrated all air pumps. Pumps were then affixed to each worker and sampling began at 6:02 AM. Throughout the shift, True North periodically checked the pumps to ensure they were functioning properly. At the completion of the shift, air pumps were stopped, and samples were collected. All air pumps were post calibrated and sampling data was recorded. True North left the site at 2:18 PM.

Sampling IH: Brittain Faville

Date Completed: 8/23/2023

\* BY MY SIGNATURE, I VERIFY THAT INFORMATION DETAILED ON THIS FORM IS COMPLETE AND ACCURATE TO THE BEST OF MY KNOWLEDGE.

Signature:

Date Signed: 8/23/2023



APPENDIX B

Laboratory Analytical Reports

# AIR SAMPLING DATA SHEET PHASE CONTRAST MICROSCOPY (PCM)

CLIENT: Southwind RAS, LLC  
SITE NAME: Southwind RAS, LLC - Romeoville, IL  
PROJECT NAME: Industrial Hygiene Monitoring

DATE: 9/23/2023  
PROJECT No: T231793.04  
DAY/SHIFT: 1/1

SAMPLED BY: Brittain Faville  
ANALYZED BY: Brittain Faville  
ANALYZED AT: Laboratory

Magnification	400	0.00785	Field Area
Fld. Diameter	100 um	0.2	C.V.
Phase Test	X	385	EFA

SAMPLE NUMBER	SAMPLE DESCRIPTION		SAMPLE TYPE	TIME		TOTAL TIME (MIN.)	FLOW RATE (LITERS PER MIN.)			SAMPLE VOLUME (LITERS)	FIBERS	FIELDS	FIBERS / MM <sup>2</sup>	FIBERS / CC
	ACTIVITY	SAMPLE LOCATION AND/OR EMPLOYEE NAME, DESCRIPTION OF WORK ACTIVITY		START	STOP		START	END	AVERAGE					
BLNK-01	N/A	Field Blank	FB	N/A	N/A	N/A	N/A	N/A	N/A	N/A	< 5.5	100	< 7.0	N/A
BLNK-02	N/A	Field Blank	FB	N/A	N/A	N/A	N/A	N/A	N/A	N/A	< 5.5	100	< 7.0	N/A
A-0823-EX1	N/A	Tomas Gonzalez -Wheel Loader Operator	EX	6:04 AM	6:34 AM	30	2.0	2.0	2.0	60	< 5.5	100	< 7.0	< 0.045
A-0823-PRS1	N/A	Tomas Gonzalez -Wheel Loader Operator	PRS	6:35 AM	1:57 PM	442	2.0	2.0	2.0	884	< 5.5	100	< 7.0	< 0.003
A-0823-EX2	N/A	Personal - Francisco Chavez - Wheel Loader / Skid Steer Operator	EX	6:02 AM	6:32 AM	30	2.0	2.0	2.0	60	< 5.5	100	< 7.0	< 0.045
A-0823-PRS2	N/A	Personal - Francisco Chavez - Wheel Loader / Skid Steer Operator	PRS	6:33 AM	1:55 PM	442	2.0	2.0	2.0	884	< 5.5	100	< 7.0	< 0.003
A-0823-EX3	N/A	Consuela Mandujano - Ticket Writer	EX	7:25 AM	7:55 AM	30	2.0	2.0	2.0	60	< 5.5	100	< 7.0	< 0.045
A-0823-PRS3	N/A	Consuela Mandujano - Ticket Writer	PRS	7:56 AM	1:59 PM	363	2.0	2.0	2.0	726	< 5.5	100	< 7.0	< 0.004

Analyst: Brittain Faville (IDPH No. 100-20845)

- 1). PCM Air Samples are Analyzed by NIOSH Method 7400 "A" Counting Rules.
- 2). The Limit of Detection is 7.0 f/mm<sup>2</sup> (<LOD=Less than the Limit of Detection).
- 3). The OSHA PEL is 0.1 f/cc and the excursion limit is 1.0 f/cc.
- 4). The required Clearance Level is 0.01 f/cc in the State of Illinois.
- 5). The EPA recommended Clearance Level is 0.01 f/cc.

8 HOUR TIME-WEIGHTED AVERAGE								
RESP. TYPE	EMPLOYEE NAME	T1	C1	T2	C2	T3	C3	TWA (f/cc)
N/A	Tomas Gonzalez	30	< 0.045	442	< 0.003			< 0.006
N/A	Francisco Chavez	30	< 0.045	442	< 0.003			< 0.006
N/A	Consuela Mandujano	30	< 0.045	363	< 0.004			< 0.006

ACTIVITY  
PREP - Site Preparation  
REM - Gross Removal  
GLBG - Glovebag Removal  
CLN - Cleaning  
O&M - Patch & Repair  
NF - Non-Friable Removal

SAMPLE TYPE  
BK - Background  
PRS - Personal  
EX - Excursion  
CL - Clearance  
ENV - Environmental  
IC - Inside Containment  
OC - Outside Containment  
FB - Field Blank

RESPIRATOR TYPE  
APR - Air Purifying Respirator  
PAPR - Powered Air Purifying Respirator  
SA - Supplied Air  
N/A - None