



Illinois Environmental Protection Agency

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

JB Pritzker, Governor

James Jennings, Acting Director

217/524-3301

CERTIFIED MAIL

RETURN RECEIPT REQUESTED

SEP 15 2025

9589 0710 5270 0389 7034 83

Owner

Town of Cicero
Attn: Mr. Craig Pesek
4949 West Cermak Road
Cicero, Illinois 60804

Operator

Honeywell International, Inc.
Attn: Mr. George Pfeiffer
114 Tabor Road
Morris Plains, New Jersey 07950

Re: 0316000037 -- Cook County
Honeywell International, Inc. (a.k.a. former Baron-Blakeslee)
ILD051937068
Log No. B-218
RCRA Administrative Record - 24D
Permit Draft

Dear Messrs. Pesek and Pfeiffer:

Attached is a draft Resource Conservation and Recovery Act (RCRA) corrective action permit (draft permit) and fact sheet for the above-referenced facility. The draft permit is based on the administrative record contained in the files of the Illinois Environmental Protection Agency (Illinois EPA). The contents of the administrative record are described in Title 35 Illinois Administrative Code (35 IAC) 705.144.

Under the provisions of 35 IAC 705.141(d), the draft permit, and administrative record must be publicly noticed and made available for public review and comment. The Illinois EPA must also provide an opportunity for a public hearing. Copies of the draft permit, fact sheet, and corrective action permit application are available for review at the Cicero Public Library, located at 5225 West Cermak Road, Cicero, Illinois. The Illinois EPA has not scheduled a public hearing at the current time. However, any interested party may request a public hearing. The public comment period will close on November 3, 2025.

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Page 2

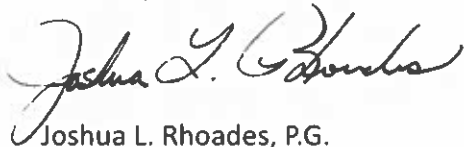
During the comment period, the applicant or any interested party may submit comments to the Illinois EPA on the draft permit. At the close of the comment period, the Illinois EPA will prepare a response to significant comments. Comments on the draft permit may be submitted to:

Sarah Brubaker, Office of Community Relations (#5)
Illinois Environmental Protection Agency
2520 West Iles Avenue
Post Office Box 19276
Springfield, Illinois 62794-9276

The Illinois EPA will issue a final RCRA corrective action permit after the close of the public comment period unless the Illinois EPA decides to reverse the tentative decision. The appeal process and limitations are addressed in 35 IAC 705.212.

For questions regarding this letter, please contact Thomas Nguyen by phone at 217/786-0753 or by email at Thomas.Nguyen@Illinois.gov. For questions regarding groundwater-related matters, please contact Aidan Fullriede, by phone at 217/557-8770 or by email at Aidan.Fullriede@Illinois.gov.

Sincerely,



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

JLR: TMN: 0316000037-RCRA-B218-Draft.docx

TNH AF TMN AMB
Attachments: Fact Sheet
Draft RCRA Corrective Action Permit

cc: Benny Dehghi, Honeywell International, Inc.
Joel Wipf, Jacobs Engineering, Inc.

FACT SHEET
for
DRAFT RCRA CORRECTIVE ACTION PERMIT
Honeywell International, Inc.
Cicero, Illinois
STATE ID NO. 0316000037
FEDERAL ID NO. ILD051937068
RCRA CORRECTIVE ACTION PERMIT LOG NO. B-218

This fact sheet has been prepared pursuant to the requirements of Title 35 Illinois Administrative Code (35 IAC) 705.143. The fact sheet is intended to be a brief summary of the principal facts and significant factual, legal, methodological, and policy questions considered in preparing a draft Resource Conservation and Recovery Act (RCRA) corrective action permit (draft permit). This draft permit requires Honeywell International Inc. (Honeywell), formally known as Baron-Blakeslee Inc. Cicero site, to continue to provide corrective action for three areas of concern (AOCs) at this site; to address any remaining closure of 14 hazardous waste management units (HWMUs) under corrective action, and to implement a groundwater corrective action program meeting the requirements of 35 IAC 724.201. Pursuant to 35 IAC 705.143(a), this fact sheet is sent to the applicant and to any other person who requests it.

I. INTRODUCTION

Honeywell is an existing facility that was first issued a RCRA permit on September 25, 1989, which allowed for the storage of hazardous waste solvents in containers and tanks at portions of the site. A closure plan for the HWMUs was approved by the Illinois Environmental Protection Agency (Illinois EPA) on September 11, 1995, and the RCRA permit eventually expired on October 31, 1999. Honeywell has continued to conduct hazardous waste cleanup activities at the site from 1995 to present date. Upon the request of the Illinois EPA, Honeywell submitted a RCRA permit application to apply for a new corrective action only permit, dated October 26, 2023, and received by the Illinois EPA on October 27, 2023. This draft permit allows Honeywell to complete any remaining corrective action at the site under RCRA corrective action, also known as hazardous waste cleanup. The draft permit for Honeywell contains all of the standard conditions required by 35 IAC Parts 702, 703, and 724; and the applicable conditions of 35 IAC 724.201, Section 3004(u) and (v) of RCRA for the completion of hazardous waste cleanup at the subject facility.

II. DESCRIPTION OF FACILITY

1. Site Description and Location

The Honeywell facility located at 1620-1634 South Laramie Avenue, Cicero, Illinois, is adjacent to the western border of Chicago, within the Chicago Metropolitan area. This 5-acre property is in Cook County and has Tax Property

Identification Numbers of 16-21-309-004, 16-21-309-005, and 16-21-309-006. A site location map and site layout map are provided to this fact sheet as Attachment 1 and Attachment 2, respectively.

2. General

The Honeywell facility consists of parcels that had a history with varying ownership throughout the past century. In the 1920s, the northern half of the property (denoted as 1620 South Laramie) had operations of cut stone works before development by G.S. Blakeslee & Co. to house their industrial cleaning division in the mid-1940s. Then in 1964, Baron Industries bought the industrial division of G.S. Blakeslee & Co. and operated under the name Baron-Blakeslee Inc. (BBI). This purchase included the transfer of ownership for the northern parcel of the subject site.

In the 1950s, the southern half of the property (denoted as 1634 South Laramie) consisted of a lumber and woodworking yard. This half of the property was bought by BBI in 1965 and is currently named the Annex Building, which consisted of Former Solvent Center and an office building. On September 25, 1989, Illinois EPA issued a RCRA permit to this facility to allow the storage of hazardous waste solvents in containers and tanks. BBI ceased operations at the facility in 1993 and the Illinois EPA approved a plan to close all 14 HWMUs at the facility on July 10, 1995; however, the original RCRA permit expired before the aforementioned HWMUs were properly closed. BBI then used the property for a commercial storage and recycling facility for waste solvents up until 1999, when BBI became part of Honeywell, which assumed the responsibility of any remaining hazardous waste cleanup at the site. The closure and remedial efforts continued after the expiration of the original permit.

In October 2006, the Town of Cicero purchased the facility; however, Honeywell still held responsibility for addressing the contamination from the waste solvent management activities that previously occurred at the subject facility. All the HWMUs once present at the subject facility have either been decontaminated and/or removed from the facility. The groundwater and soil contamination present at the facility has been addressed through investigative work, as well as remedial efforts for certain portions of the subject facility. The current site Owner is the Town of Cicero, who uses the facility for municipal activities. Honeywell has completed environmental investigations and is currently performing corrective measures activities.

III. HISTORICAL HAZARDOUS WASTE MANAGEMENT ACTIVITIES

There are currently no HWMUs being operated on or under post-closure care at the Honeywell facility. A total of 14 historical HWMUs have been decontaminated and/or removed. As the subject HWMUs have not completed closure, in accordance with 35 IAC 724.210(c)(1), any remaining contamination associated with closure of the 14 HWMUs are now addressed under corrective action program, subject to the requirements of 35 IAC 724.201.

The 14 HWMUs that were subject to RCRA closure requirements of the original RCRA permit include: (1) container storage areas designated as Areas E, F, N, O, P, R, and S; (2) hazardous waste tanks designated as L, 17, 18, 19, 23, and 24; and (3) a 15,000-gallon underground storage tank (UST). All HWMUs except for the Former UST were historically located in the Former Solvent Center building and surrounding area. A list of the HWMUs are provided in Table 1 below.

Table 1: List of Former HWMUs

HWMUs	
Area E - Hazardous Waste Staging Area	Area L - Solvent Recovery Still
Area F - Loading Dock	Area Q - Tank 17
Area N - Product Drum Storage Area	Area Q - Tank 18
Area O - Hazardous Waste Drum Storage Area	Area Q - Tank 19
Area P - Ignitable Waste Drum Storage Area	Tank 23 (Distillate Storage)
Area R - Hazardous Waste Drum Storage Area	Tank 24 (Distillate Storage)
Area S - Hazardous Waste Drum Storage Area	Former UST

Honeywell has historically managed several hazardous wastes at the site. The hazardous wastes that were managed at the Former Solvent Center include, by waste codes: F001, F002, U080, U210, U226, and U228. The hazardous wastes that were generated at the Former Solvent Center include, by waste codes: D001, F002, U080, U210, U226, and U228. The hazardous wastes that were formerly stored from off-site generators include, by waste codes: D001, D007, F001, F002, F003, and F005.

These former HWMUs were located within the three AOCs, and any remaining contamination from the HWMUs are being addressed under corrective action as described in Section IV below.

IV. CORRECTIVE ACTION ACTIVITIES

Honeywell has been required to complete corrective action, also referred to as hazardous waste cleanup, for three AOCs (AOC-1, AOC-2, and AOC-3) present at the site. All 14 former HWMUs identified in Section III above are located at AOC-2 and AOC-3.

Included as part of corrective action and also found in Section II of the draft permit, are groundwater monitoring requirements including the implementation of a Groundwater Management Zone (GMZ) associated with corrective action meeting the requirements of 35 IAC 724.201 at the facility.

As for groundwater corrective action, hazardous waste constituents have been detected in groundwater monitoring wells at the facility in the vicinity of HWMUs and solid waste management units (SWMUs) above the groundwater quality standards established in 35 IAC Part 620 and background values. Therefore, a corrective action program meeting the requirements of 35 IAC 724.201 must be implemented at the facility.

The groundwater corrective action program required by this permit includes:

1. Determining the quality of groundwater, within the GMZ and in the vicinity of the Honeywell Cicero facility, by comparing analytical results for the specified hazardous constituents to the concentration limits that comprise the groundwater protection standard.
2. Evaluating the effectiveness of the corrective action based on the quality of groundwater within the GMZ and in the vicinity of the Honeywell Cicero facility.
3. The postponement of the establishment and monitoring of the point of compliance until the monitoring wells in the program have attained the applicable concentration limits that comprise the groundwater protection standard and the GMZ expires. The compliance period during which the groundwater protection standard applies shall be extended until it can be demonstrated that the groundwater protection standard has not been exceeded at the point of compliance for three consecutive years.

V. PERMIT CONDITIONS

The following is a brief description of the requirements of the draft permit:

1. Section II of the draft permit contains conditions regarding the corrective action activities that have been and will be performed.
2. Section III of the draft permit contains special conditions. The permit conditions implement the regulatory requirements of 35 IAC Parts 724 and 742, and the Illinois Environmental Protection Act (Act).
3. Section IV of the draft permit contains standard conditions that are regulatory requirements of 35 IAC Parts 702, 703, and 724. The standard conditions are of a general nature and are applicable to all hazardous waste management facilities

regulated pursuant to an Illinois EPA RCRA permit. These conditions include the effectiveness of the permit, permit actions, permit severability, permit expiration, monitoring, retention of records, permit transfer, and compliance schedules.

4. Section V of the draft permit contains a summary of the reporting and notification requirements the Permittee must follow.

VI. CONSIDERED PERMIT ACTIONS OTHER THAN RCRA

1. Memorandum of Understanding (MOU)
A MOU between the Town of Cicero and the Illinois EPA is in-place for the purpose of satisfying the requirements of 35 IAC 742.1015 for the use of groundwater or water well ordinances as an ELUC (Ordinance Code: 97112501). This MOU specifies the responsibilities assumed by the unit of local government to satisfy the requirements for MOU as set forth at 35 IAC 742.1015(I), and more specifically to prohibit the use of groundwater for potable purposes and/or the installation and use of new potable water supply wells by private entities but does not expressly prohibit those activities by the unit of local government itself.
2. Water
Honeywell currently does not have permits to discharge any process water.

VII. PROCEDURES FOR REACHING A FINAL DECISION

Pursuant to 35 IAC 705.162(a)(2), the public is given at least 45 days to review the application and draft permit and provide comments on the draft permit conditions prior to Illinois EPA taking any final permitting action on the application for this draft permit. The comment period will begin on September 18, 2025, the date of the first publication of the public notice in the newspaper of general circulation in the area. The comment period will end on November 3, 2025.

Copies of the permit application, draft permit, and fact sheet are available for review at:

Cicero Public Library
5225 West Cermak Road
Cicero, Illinois 60804

The administrative record contains the permit application, draft permit, fact sheet, and other supporting documents and correspondence submitted to the Illinois EPA. The administrative record can be made available for public inspection by appointment only at the Illinois EPA's Springfield headquarters from 9:00 a.m. to 5:00 p.m., Monday

through Friday. Inspections of the administrative record must be scheduled in advance by contacting Ms. Sarah Brubaker of the Illinois EPA at the address listed below.

In response to requests received during the comment period or at the discretion of the Illinois EPA, a public hearing may be held to clarify one or more issues concerning the permit application. A request for a public hearing must be submitted in writing, must indicate opposition to the draft permit and must state the nature of the issues proposed to be raised at the hearing. Public notice of the public hearing will be issued at least 45 days before the hearing date.

For further information regarding the permit process, to submit written comments on the draft permit, or to request a public hearing, please contact:

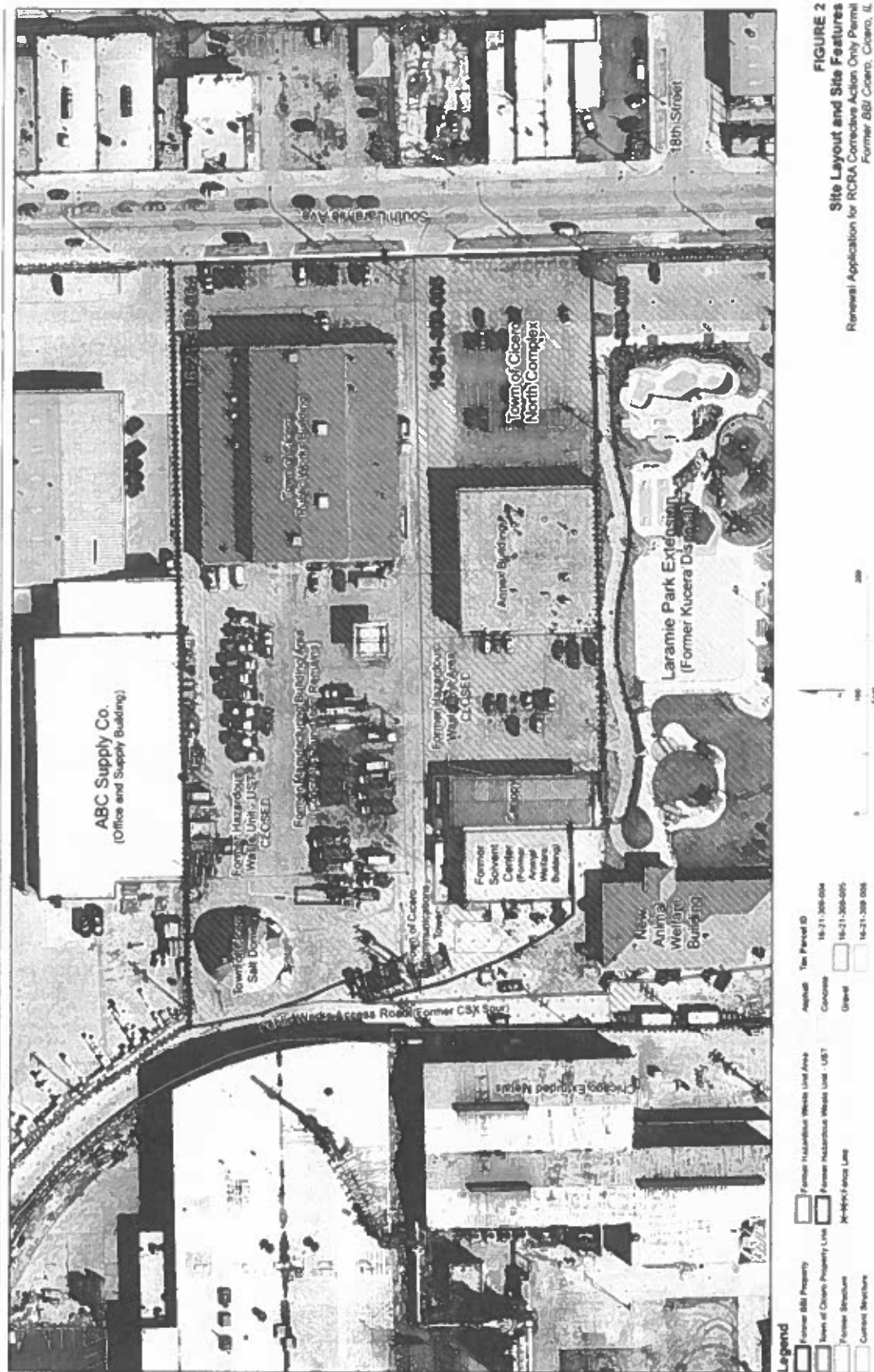
Sarah Brubaker, Office of Community Relations #5
Illinois Environmental Protection Agency
2520 West Iles Avenue
Post Office Box 19276
Springfield, Illinois 62794-9276
(217) 786-0790

When the Illinois EPA makes a final permit decision, notice will be given to the applicant and each person who has submitted written comments or requested notice of the final permit decision. The permit will become effective 35 days after service of notice of the decision or at a later date if stated in the permit unless the decision is appealed.

Attachment 1 - Site Location Map

Attachment 2 - Site Layout Map







Illinois Environmental Protection Agency

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

JB Pritzker, Governor

James Jennings, Acting Director

RCRA CORRECTIVE ACTION PERMIT

0316000037 -- Cook County
Honeywell International, Inc.
ILD051937068
Permit Log No. B-218
RCRA Administrative Record - 24D
Permit Draft

Issue Date: DRAFT
Effective Date: DRAFT
Expiration Date: DRAFT

PERMITTEE

Honeywell International, Inc.
Attn: Mr. George Pfeiffer
114 Tabor Road
Morris Plains, New Jersey 07950

FACILITY LOCATION

1620-1634 South Laramie Avenue
Cicero, Illinois 60804

A Resource Conservation and Recovery Act (RCRA) corrective action permit is hereby issued to Honeywell International, Inc., as Operator and Permittee pursuant to Section 39(d) of the Illinois Environmental Protection Act and Title 35 Illinois Administrative Code (35 IAC) Subtitle G.

PERMITTED HAZARDOUS WASTE ACTIVITY

This RCRA permit requires Honeywell International Inc. to conduct the following hazardous waste activities in accordance with the approved permit application and the conditions in this permit:

1. **Corrective Action:** Three (3) areas of concern (AOCs)
2. **Groundwater Monitoring:** Corrective Action Program

This RCRA permit consists of the conditions contained herein and those in sections and attachments in this RCRA permit. The Permittee must comply with all terms and conditions of this permit and the applicable regulations contained in 35 IAC Parts 702, 703, 705, and 720 through 729 in effect on the effective date of this permit.

This permit is issued based upon the information submitted in the approved permit application identified in Attachment A of this permit and any subsequent amendments. Any inaccuracies found in the information provided in the permit application may be grounds for the termination or modification of this permit (see 35 IAC 702.186 and 702.187) and potential enforcement action (415 ILCS 5/44(h)).

DRAFT

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

JLR: TMN: 0316000037-RCRA-B218-Draft.docx

TMN *AMB*

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412 SW Washington Street, Suite D, Peoria, IL 61602 • 309-671-3022

115 S. LaSalle Street, Suite 2203, Chicago, IL 60603
9511 Harrison Street, Des Plaines, IL 60016 • 847-294-4000
2309 W. Main Street, Suite 116, Marion, IL 62959 • 618-993-7200
4302 N. Main Street, Rockford, IL 61103 • 815-987-7760

Please print on recycled paper.

RCRA Corrective Action Permit

Honeywell International, Inc.

Cicero, Illinois

Permit Log No. B-218

State ID No. 0316000037

Federal ID No. ILD051937068

**RCRA Corrective Action Permit
Honeywell International, Inc.**

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SECTION I - GENERAL FACILITY DESCRIPTION

A. OWNER AND OPERATOR

The facility is owned by the Town of Cicero and operated by Honeywell International Inc. (Honeywell), herein referred to as the "Permittee(s)." (Title 35 Illinois Administrative Code (35 IAC) 702.121, 702.123, and 703.181)

Honeywell International Inc.
1620-1634 South Laramie Avenue
Cicero, Illinois 60804

B. LOCATION

1. Location of Facility

The Honeywell facility located at 1620-1634 South Laramie Avenue, Cicero, Illinois, is adjacent to the western border of Chicago, within the Chicago Metropolitan area. The 5-acre site has been under the ownership of the Town of Cicero since 2006. The facility is located at:

Honeywell International Inc.
1620-1634 South Laramie Avenue
Cicero, Illinois 60804

2. Facility Map

The general location of the facility, a site layout map, the location of all former hazardous waste management units (HWMUs), and the location of areas of concern (AOCs) are provided in Attachment B of this permit.

C. DESCRIPTION OF HAZARDOUS MANAGEMENT ACTIVITIES

There are not currently active HWMUs at the site. The Permittee was involved in solvent operations, including the storage of hazardous waste solvents in containers and tanks at the facility. A total of 14 HWMUs were historically permitted under an original RCRA hazardous waste management operating permit (original RCRA permit) issued on September 25, 1989 for the facility by the Illinois EPA. Closure of the HWMUs was not completed when the original RCRA permit expired on October 31, 1999.

Honeywell has historically managed several hazardous wastes at the site. The hazardous wastes that were managed at the Former Solvent Center include, by waste codes: F001, F002, U080, U210, U226, and U228. The hazardous wastes that were generated at the Former Solvent Center include, by waste codes: D001, F002, U080, U210, U226, and

U228. The hazardous wastes that were formerly stored from off-site generators include, by waste codes: D001, D007, F001, F002, F003, and F005.

In accordance with 35 IAC 724.210(c)(1), the closure requirements of the subject former HWMUs to meet the requirements of 35 IAC 724, Subpart G are addressed under corrective action. The 14 former HWMUs subject to closure through corrective action include: container storage areas designated as Areas E, F, N, O, P, R, and S, and hazardous waste tanks designated as L, 17, 18, 19, 23, 24, and Former underground storage tank (UST).

1. There are no regulated HWMUs operating or requiring closure/post-closure care under this permit at this facility. Because no HWMUs remain at the site, several portions of 35 IAC Part 724 are not applicable to this permit. This includes the requirements for personnel training (35 IAC 724, Subpart B), preparedness and prevention (35 IAC 724, Subpart D). However, please note that through the application of other laws, regulations, and permit conditions, some of the concepts covered by these regulations may still apply to corrective action activities conducted at the site.
2. The Permittee currently proposes no corrective action activities that would subject the facility to a RCRA Remedial Action Plan Permit (RAPP). If plans change in the future such that one or more corrective action activities would subject the facility to a RCRA RAPP, the Permittee must submit a modification request to incorporate requirements for a RAPP into this permit in addition to the plans submitted as a part of normal corrective action document, as well as certification in accordance with Section 39(i) of the Illinois Environmental Protection Act.
3. Upon completion of corrective action, the Permittee must submit a certification of completion of RCRA closure for the 14 former HWMUs. The certification is included in Attachment E to this permit.

SECTION II: CORRECTIVE ACTION

A. INTRODUCTION

1. In accordance with Section 3004(u) and Section 3004(v) of RCRA and 35 IAC 724.201 and 724.210(c)(1), the Permittee(s) shall institute such corrective action as necessary to protect human health and environment from all releases of hazardous wastes or hazardous waste constituents, listed in 35 IAC 721, Appendix H, from any former HWMU and AOC at the facility. This section contains the conditions which must be followed to ensure these requirements are met.

Note: The term "corrective action" and "hazardous waste cleanup program" or "hazardous waste cleanups" are used interchangeably throughout the permit, Illinois EPA letters, associated forms, reference, guidance, and any other materials associated with the requirements under this section.

2. The Illinois EPA issued a RCRA hazardous waste management operating permit on September 25, 1989, which allowed for the storage of hazardous waste solvents in containers and tanks associated with the Former Solvent Center. Investigations were conducted into the nature and extent of environmental impacts, followed by corrective actions. To complete required corrective activities at the site, Honeywell is now issued a corrective action only permit for the site.
3. There are no solid waste management units (SWMUs) identified by Honeywell at the site. Three AOCs have been identified by Honeywell at the site as part of site investigations that were conducted from 1995 to 2002.
4. As 35 IAC Part 742 was amended to include indoor inhalation exposure route and the Former Solvent Center building is undergoing restoration, a re-evaluation of the indoor inhalation pathway must be done to meet all updated remediation standards to meet the requirements of 35 IAC Part 742.
5. The Permittee must carry out interim measures in accordance with the terms, conditions, and requirements of this permit to address existing contamination at the facility until such time as a final corrective measure can be developed and implemented.
6. The Permittee must provide hazardous waste cleanups, as appropriate for: (1) any newly discovered AOCs; or (2) future releases for existing AOCs at the facility.

7. Investigation and remediation efforts carried out as part of the corrective action program implemented in accordance with this permit must meet the requirements of: (1) this permit, and the regulations cited herein; (2) the Illinois EPA and the United States Environmental Protection Agency (USEPA) guidance documents regarding such efforts; and (3) the Illinois EPA letters regarding such activities.
8. Unless there is a desire to modify specific requirements set forth in this Section, information submitted to the Illinois EPA regarding the corrective action requirements set forth in this Section is not a request to modify this permit nor subject to the requirements of 35 IAC 703 Subpart G.
9. All Illinois EPA final decisions regarding RCRA corrective action at this facility are subject to the appeal provisions of Sections 39(a) and 40(a) of the Illinois Environmental Protection Act (Act).
10. All documents submitted to the Illinois EPA regarding corrective action efforts must be accompanied by a completed RCRA Corrective Action Certification Form. This form can be found on the Illinois EPA website.
11. Based on the results of the investigative efforts as required in corrective action, the Illinois EPA reserves the right to withdraw any "No Further Action" (NFA) determinations.
12. The Permittee shall incorporate, as necessary, climate change adaptation considerations into the corrective action required at this facility in accordance with the applicable USEPA guidance(s) regarding integrating climate change adaptation considerations into the RCRA corrective action process.
13. In accordance with 35 IAC 724.190 and 724.210(c)(1), closure of the 14 former HWMUs at the facility must be addressed under corrective action.

B. CORRECTIVE ACTION REQUIREMENTS

1. Investigations were conducted into the nature and extent of environmental impacts, followed by corrective actions, which allowed identification of three AOCs, AOC-1 through AOC-3 at the site. AOC-3 has been further subdivided into AOC-3a, AOC-3b, and AOC-3c. Honeywell has been required to complete corrective action, for the following AOCs at the site:

<u>AOC#</u>	<u>AOC Description</u>
1	Northwest Soil Removal Area
2	Former UST
3	Former Solvent Center Area: 3a - Former Kucera Property 3b - Former Solvent Center 3c - Western Area

2. Included as part of corrective action are groundwater corrective action requirements such as the implementation of a corrective action program for groundwater meeting the requirements of 35 IAC 724.201 at the facility. For groundwater corrective action, hazardous waste constituents have been detected in groundwater monitoring wells at the facility in the vicinity of HWMUs and SWMUs above the groundwater quality standards established in 35 IAC Part 620 and background values. Therefore, a corrective action program meeting the requirements of 35 IAC 724.201 must be implemented at the facility.
3. All investigation efforts conducted at each AOC, in Condition II.B.1 must be sufficient as to thoroughly characterize contamination associated with all the identified recognized environmental conditions present in the area.
4. Condition II.E below includes the facility's corrective action efforts that have been completed, updated to October 2023. Condition II.F below includes the required corrective action that still must be completed at the facility.
5. Conduct additional investigation and remediation, as necessary, to address any on-site and/or off-site contamination, which has migrated beyond the property boundaries from the former operation of the facility.
6. All plans and reports associated with all aspects of corrective action at this facility should be submitted to the Illinois EPA for review and approval before implemented. A summary of the plans/reports submitted to date regarding corrective action at this facility, organized by the Illinois EPA log number (and thus the chronologic order in which the plans/reports were submitted) is provided in Attachment C; this attachment also identifies the Illinois EPA's final action on each submittal.
7. The requirements of 35 IAC Parts 620 and 742 must be met, when applicable, in establishing remediation objectives for corrective action. In addition, all corrective action efforts must meet the requirements of 35 IAC 724.201.

8. The ELUC recorded on March 24, 2014 by the Town of Cicero for the property located at the address 1800 South Laramie Avenue Cicero, Cook County, Illinois (Document Number: 1408339046) must follow the applicable rules and regulations of 35 IAC 742.1010, including the fulfillment of Condition III.C.1.
9. Groundwater corrective action requirements must be met in accordance with the conditions listed below in Section II.C.
10. Components of the corrective action program must include:
 - a. Continued groundwater monitoring and corrective action program in accordance with the conditions in Section II.C of this permit.
 - b. Continued implementation of environmental land use controls (ELUCs) - Conditions II.B.8, III.C.1, and III.C.2 of this permit.
 - c. Continued compliance with all applicable and required conditions listed in Illinois EPA letters and correspondences, including all corrective action submittals listed in Attachment C to this permit.
11. Upon completion of all corrective action requirements under Section II of this permit, the closure of the 14 former HWMUs identified in Condition II.D.1.a will meet the requirements of 35 IAC 724.211 and 724.215.

C. GROUNDWATER CORRECTIVE ACTION

1. Hazardous constituents have been detected in groundwater monitoring wells at the Honeywell Cicero facility in the vicinity of HWMUs and AOCs above the groundwater quality standards established in 35 IAC Part 620 and background values. Therefore, a corrective action program meeting the requirements of 35 IAC 724.201 must be implemented at the Honeywell Cicero facility.

The groundwater monitoring program associated with corrective action activities required by this permit includes:

- a. Determining the quality of groundwater, within the Groundwater Management Zone (GMZ) and in the vicinity of the Honeywell Cicero facility, by comparing analytical results for the specified hazardous constituents to the concentration limits that comprise the groundwater protection standard.

- b. Evaluating the effectiveness of the corrective action based on the quality of groundwater within the GMZ and in the vicinity of the Honeywell Cicero facility. A GMZ re-evaluation must be conducted every five years.
 - c. The postponement of the establishment and monitoring of the point of compliance until the monitoring wells in the program have attained the applicable concentration limits that comprise the groundwater protection standard and the GMZ expires. The compliance period during which the groundwater protection standard applies shall be extended until it can be demonstrated that the groundwater protection standard has not been exceeded at the point of compliance for three consecutive years.
2. The Permittee must maintain the groundwater monitoring program, including the List 1 and List 2 wells identified below, established in the January 28, 2014 Illinois EPA approval letter (Log No. B-11-CA-26) and all subsequent letters.

List 1: Groundwater Management Zone Boundary Wells

IEPA Well No.	Facility Well No.	Well Depth (Ft bgs)	Well Depth Elevation (Ft MSL)	Well Screen Interval (Ft MSL)	State Plane Coordinates (Northing/Easting)
GC01	SMW-1	20	589.73	599.73-589.73	1891422.00/1141367.37
GC2S	SMW-2	20	587.68	597.68-587.68	1891160.10/1141609.12
GC2M	IMW-2	30	577.69	587.69-577.69	1891160.48/1141614.18
SMW-4R	SMW-4R	20	588.85	598.85-588.85	1890824.93/1141492.71
GC5S	SMW-5	20	589.16	599.16-589.16	1891096.70/1141315.48
GC5M	IMW-5	30	579.17	589.17-579.17	1891101.23/1141316.45
SMW-7	SMW-7	20	589.09	599.09-589.09	1890809.19/1141622.45
IMW-7	IMW-7	30	579.00	589.00-579.00	1890808.34/1141619.87
SMW-8	SMW-8	20	588.40	598.40-588.40	1890971.58/1141883.76
G115	MW15	15.65	593.00	603.25-593.00	1890921.16/1141328.53
G116	MW16	15.65	592.88	603.47-593.22	1891235.82/1141280.68

List 2: Observation Zone Wells

IEPA Well No.	Facility Well No.	Well Depth (Ft bgs)	Well Depth Elevation (Ft MSL)	Well Screen Interval (Ft MSL)	State Plane Coordinates (Northing/Easting)
G02M	MW-2I	20	587.51	592.51-587.51	1891026.74/1141534.87
G02D	MW-2D	30	577.45	582.45-577.45	1434550.97/1141534.87
G03S	MW-3S	19.9	588.46	601.56-588.76	1891274.61/1141410.17
G03M	MW-3B	69.3	539.05	549.55-539.35	1891274.25/1141416.30

G05S	MW-5S	20	587.42	600.52-587.52	1891096.98/1141572.17
G06S	MW-6S	20.2	588.06	601.16-588.36	1891062.10/1141366.40
G06D	MW-6D	38.8	569.46	579.46-569.86	1891054.88/1141366.71
G08S	MW-8S	19.8	588.34	601.44-588.84	1890960.96/1141531.71
G08D	MW-8D	39.7	568.68	580.68-568.88	1890950.19/1141530.50
G09S	MW-9S	19.8	588.81	601.91-589.31	1890951.17/1141607.41
G09D	MW-9D	40	568.58	580.68-568.78	1890951.60/1141614.91
G10S	MW-10S	20.1	587.80	600.90-588.10	1891017.51/1141640.73
G111	MW-11	15.6	594.24	604.49-594.24	1891405.14/1141353.11
G12S	MW-12S	20	589.03	599.03-589.03	1890966.03/1141452.26
G12D	MW-12D	35	573.89	583.89-573.89	1890965.37/1141443.65
G801	PRB-MW-1	15	594.27	604.27-594.27	1890946.67/1141386.64
G802	PRB-MW-2	15	593.87	603.87-593.87	1890948.15/1141461.82
G803	PRB-MW-3	15	595.26	605.26-595.26	1890926.39/1141611.18
GC65	SMW-6	20	587.64	597.64-587.64	1890973.07/1141786.21

D. ADDRESSING CLOSURE OF HWMUS UNDER CORRECTIVE ACTION

1. The Illinois EPA issued a RCRA hazardous waste management operating permit on September 25, 1989 (Log No. B-11), which allowed for the storage of hazardous waste solvents in containers and tanks associated with the Former Solvent Center at 14 HWMUs, identified in Table 1 in Condition II.D.1.a below, at the facility. Since ceasing the operation at the facility in mid-1990's, a decision was made to cease operations at the Honeywell Cicero facility and the initial RCRA permit eventually expired. The closure effort of the 14 former HWMUs included removal of wastes, and decontamination and/or removal of the unit(s), followed by continued efforts to remediate the remaining contamination in soils and groundwater at the facility to date.

- a. A list of 14 former HWMUs are identified in Table 1 below:

Table 1: List of Former HWMUs

Former HWMUs	AOC Location
Former UST	AOC-2
Area E - Hazardous Waste Staging Area	AOC-3
Area F - Loading Dock	AOC-3
Area L - Solvent Recovery Still	AOC-3
Area N - Product Drum Storage Area	AOC-3
Area O - Hazardous Waste Drum Storage Area	AOC-3
Area P - Ignitable Waste Drum Storage Area	AOC-3
Area Q - Tank 17	AOC-3
Area Q - Tank 18	AOC-3

Area Q - Tank 19	AOC-3
Area R - Hazardous Waste Drum Storage Area	AOC-3
Area S - Hazardous Waste Drum Storage Area	AOC-3
Tank 23 (Distillate Storage)	AOC-3
Tank 24 (Distillate Storage)	AOC-3

- b. The locations of the 14 HWMUs identified in Condition II.D.1.a are provided on pages B-2 and B-3 in Attachment B of this permit.
- c. The historical waste generated/managed at 14 former HWMUs identified in Condition II.D.1.a. are provided in Table 2 below:

Table 2: Waste Generated/Managed by Former HWMUs

Description	Waste Code(s)	Location
Still bottoms (solvent operations), stored for off-site disposal	F002	AOC-2
Waste ignitable solvents	D001	AOC-3
Waste ignitable solvents	D001	AOC-3
Spent solvents, thinners - ignitable waste (spray painting), stored for off-site disposal	D001	AOC-3
Used paint filters from former manufacturing facility, stored for off-site disposal	D007	AOC-3
Spent halogenated solvents (machine testing), treated on-site	F001	AOC-3
Spent halogenated solvents - (tetrachloroethylene (PCE), trichloroethylene (TCE), methylene chloride, 1,1,1-trichloroethane (TCA), chlorinated fluorocarbons, and associated sludges)	F001	AOC-3
Spent halogenated aliphatic solvents	F001, F002	AOC-3
Waste fluorocarbon solvents	F002	AOC-3
Waste methylene chloride	U080	AOC-3
Waste PCE	U210	AOC-3
Waste 1,1,1-TCA	U226	AOC-3
Waste TCE	U228	AOC-3
Off-specification halogenated solvents	U210, U228, U226, U080	AOC-3
Spent halogenated solvents - (PCE, TCE, methylene chloride, 1,1,1-TCA, 1,1,2-Trichlo-1,2,2-trifluoroethane, and associated still bottoms)	F002	AOC-2 & AOC-3

Spent non-halogenated solvents - (xylene, acetone, ethyl acetate, methyl isobutyl ketone (MIBK), n-butyl alcohol, cyclohexanone, methanol, and associated still bottoms)	F003	AOC-2 & AOC-3
Spent non-halogenated solvents - (toluene, methyl ethyl ketone (MEK), carbon disulfide, isobutanol, pyridine, and associated still bottoms)	F005	AOC-2 & AOC-3

2. In accordance with 35 IAC 724.190 and 724.210(c)(1), RCRA closure of the 14 HWMUs identified in Condition II.D.1.a must be addressed through the corrective action requirements in Section II of this permit.
3. Completion of corrective action by obtaining a NFA for all AOCs identified under Condition II.B.1 from the Illinois EPA and meeting all the requirements of Condition II.F will fulfill the RCRA closure requirements of 35 IAC 724.211 and 724.215 for the 14 former HWMUs identified in Condition II.D.1.a.

E. SUMMARY OF CORRECTIVE ACTION EFFORTS COMPLETED

1. After the original permit expired in 1999, site investigations were conducted from 1995 to 2002, to characterize the nature and extent of environmental impacts to the soil at the site. Findings from these investigations conclude that contamination occurred through small spills and releases across many years. During this time span, the contaminants of concern (COCs) slowly migrated radially away from the assumed origin areas AOC-2 and AOC-3. Honeywell decided to undergo corrective action to remediate portions of the site. Upon completion of all required corrective action requirements, the closure of the HWMUs will meet the requirements of 35 IAC 724.211 and 724.215.
2. A summary of completed RCRA closure efforts for the former HWMUs identified in Condition II.D.a is as follows:
 - a. The Illinois EPA approved the original closure plan on July 10, 1995. The proposed closure activities include the decommissioning of tanks, decontamination of tanks and container storage areas, integrity inspection of concrete surfaces, soil sampling, etc. (Log No. B-11-M-2).
 - b. The Illinois EPA issued a letter on September 9, 1995 in response to a July 18, 1995 request for clarification of some conditions in its July 10, 1995 letter (Log No. B-11-M-2).

- c. Using a low-temperature thermal desorption (LTTD) unit, contaminated soil was treated at the Former UST, in accordance with Illinois EPA approval of a Class 1* permit modification dated February 26, 1996 (Log No. B-11-M-4).
- d. The Illinois EPA approved an interim closure documentation report on June 18, 1996 that documents corrective action activities, which include decontamination of concrete surfaces, structural integrity inspections, and the decontamination and removal of ASTs. Honeywell proposed a Tier 2 or 3 procedures for a Tiered Approach to Corrective Action Objectives (TACO) evaluation, in which the Illinois EPA required the facility to properly characterize contamination at the site prior to evaluation (Log No. B-11-M-5).
- e. The Illinois EPA approved a report on July 19, 1996 documenting the activities for treating contaminated soil excavated from the Former UST using LTTD System (Log No. B-11-M-6).
- f. The Illinois EPA approved an amended closure plan on February 4, 1997 which proposed additional investigations to better characterize the site (Log No. B-11-M-6).
- g. The Illinois EPA disapproved a site investigation report dated November 12, 1997, which presented results of a TACO analysis for both soil and groundwater (Log No. B-11-M-6).
- h. The Illinois EPA approved a sampling and analysis plan (SAP) in a letter dated June 23, 1998. The SAP defined the extent of both the soil and groundwater contamination (Log No. B-11-M-7).
- i. The Illinois EPA approved a submittal on December 16, 1998, which addressed certain requirements and conditions of the investigation in an Illinois EPA-approved letter dated June 23, 1998 (Log No. B-11-M-7).
- j. The Illinois EPA approved a submittal on February 3, 1999, which addressed certain requirements and conditions of the investigation in an Illinois EPA-approved letter dated June 23, 1998 (Log No. B-11-M-8).
- k. The Illinois EPA approved a site investigation report on September 16, 1999, which contained results of soil and groundwater investigations that addressed contamination at the site (Log No. B-11-M-9).

- l. The Illinois EPA approved a document on February 20, 2002, which included evaluation of free product at the site and a report of groundwater monitoring results (Log No. B-11-M-11).
 - m. The Illinois EPA denied and identified deficiencies for a proposed GMZ for the facility in a letter dated January 23, 2003 (Log No. B-11-M-12).
 - n. The Illinois EPA denied and identified deficiencies for a proposed remedial action work plan addressing contamination at the site in a letter dated March 4, 2003 (Log No. B-11-M-13).
 - o. The Illinois EPA approved the request to extend the submittal date for a proposed GMZ, established the requirement for the facility to submit a Current Conditions Report (CCR), and a plan to address off-site soil contamination in a letter dated July 14, 2003 (Log No. B-11).
 - p. The Illinois EPA approved a work plan for a free product recovery field test to address free product recovery in a letter dated October 7, 2005 (Log No. B-11-M-14).
 - q. The Illinois EPA approved a plan to remove contaminated soil from within a limited off-site area on the ABC property in the vicinity of soil boring GP-23 in a letter dated October 28, 2005 (Log No. B-11-M-15).
 - r. The Illinois EPA approved a work plan regarding closure activities performed at the facility, which established proper sampling procedures and the requirement to submit a closure documentation report (Log No. B-11-M-16).
 - s. The Illinois EPA approved a submittal for a proposal for a work plan for a second free product recovery field test to address the recovery of free product at the Honeywell Cicero facility in a letter dated December 19, 2006 (Log No. B-11-M-17).
- 3. The completed corrective action activities for each AOC identified in Condition II.B.1 is as follows:
 - a. For the Northwest Soil Removal Area, also known as AOC-1, soil and groundwater grab sampling started in 1988 and continued to 2001. As PCE and TCE exceedances were observed, Honeywell excavated soils in the vicinity of AOC-1 in accordance with a work plan approved by the

Illinois EPA dated October 28, 2005. The excavated soils were properly backfilled with clean soil and paved with asphalt.

- b. For the Former UST, also known as AOC-2, the UST was removed in 1995 under a work permit from the City of Cicero Building Department. Further activities included soil excavation, backfilling with gravel, and resurfacing the area with asphalt. Results from the aforementioned site investigations conclude the presence of dense non-aqueous phase liquid (DNAPL) in the approximately 600 square feet of soils in AOC-2. In late 2015, the affected soils and concrete pad were excavated and/or removed in accordance with a proposal approved by the Illinois EPA on April 10, 2015. The Illinois EPA issued NFA for soils at AOC-2 in a letter dated February 1, 2017.
- c. For the Former Solvent Center Area, also known as AOC-3, the aforementioned site investigations concluded that COCs were present in the soils.
 - i. For AOC-3a, volatile organic compounds (VOCs) were detected in soil and groundwater present in the northwestern side of AOC-3a. Under Illinois EPA-approved letters dated December 21, 2011 and April 26, 2013, AOC-3a was renovated into a public park under ownership by the Town of Cicero in 2016. The corrective action activities that were conducted at the site include:
 - (1) Demolition and off-site disposal of existing material storage canopies, concrete, and asphalt within the proposed excavation area and along the proposed permeable reactive barrier (PRB) alignment.
 - (2) Excavation and off-site disposal of VOC-impacted soils and of excavation dewatering.
 - (3) The installation of a subsurface engineered barrier, a passive soil vent system, and a liner with additional placements.
 - (4) The construction of a PRB wall in the northern portion of the property to reduce migration of low concentration VOCs in groundwater as an interim measure.
 - ii. For AOC-3b, contamination was observed in the soils within and immediately adjacent to the Former Solvent Center building. The

COCs include site-specific chlorinated VOCs and DNAPL.

Honeywell speculates that the source of contamination comes from two unlined sumps in the vicinity of AOC-3. Corrective action activities that were conducted at the site include:

- (1) In January 2011, Honeywell sealed accessible potential vapor pathways and conducted associated vapor sampling events. Results from sampling indicated that the Former Solvent Center building had exceedances in the soil gas for proposed Tier 1 levels approved by the Illinois EPA for the indoor inhalation exposure route.
 - (2) In July 2012, a vapor intrusion mitigation system (VIMS) was installed to remove contaminated soil vapors from beneath the floor of the Animal Welfare Building at the site. The VIMS was shut down on December 5, 2016.
 - (3) In accordance with an Illinois EPA-approved proposed design report and implementation plan, in-situ thermal treatment (ISTT) was used to recover DNAPL under site-specific Tier 2 soil saturation limit (C_{sat}) values. ISTT operations from 2017 through 2018 recovered approximately 25,000 pounds of DNAPL, and decommissioning activities were completed in 2018.
- iii. For AOC-3c, site investigations identified in Condition II.E.1 indicated that DNAPL was present in the Western Area. More specifically DNAPL was observed in sensor well TPV-F5 and determined to be mobile.
- (1) Honeywell collected a total of 216 unique soil samples during the Western Area site investigations starting in 2017.
 - (2) Sensor well TPV-F5 was abandoned in April 2018, following the completion of ISTT operations.
 - (3) Supplementary characterization activities were performed in 2019 and 2022 to define the extent of contamination of COCs in the soils of AOC-3c. This included the installation of seven (7) soil borings.

- (4) In 2021, Honeywell conducted bench-scale testing by installing an additional 23 soil borings to refine the horizontal delineation of site-specific limits (SSL) exceedances and to characterize the geology of AOC-3c.
4. A chronological list summarizing the documentation that was submitted to the Illinois EPA in regard to corrective action efforts at the Honeywell Cicero facility is provided on Page C-1 in Attachment C of this permit.

F. SUMMARY OF CORRECTIVE ACTION EFFORTS STILL TO BE COMPLETED

1. As part of meeting all the corrective action requirements in Condition II.B, the following corrective action and closure activities that still need to be completed are as follows:
 - a. All AOCs identified in Condition II.B.1 require NFA determinations from the Illinois EPA to complete corrective action.
 - b. Contamination in AOC-3 identified in Condition II.B.1 needs to be addressed. Honeywell proposes to use soil mixing based on a pilot-scale proof-of-concept remedial action plan. The proposal aims to address SSL exceedances and to eliminate preferential pathways in the Western Area soils. A Western Area report and work plan and a supplemental site investigation report have been submitted to the Illinois EPA and are under review (Log No. B-11-CA-51 & 57).
 - c. The establishment of institutional controls is required upon issuance of NFA determinations for the AOCs identified in Condition II.B.1, in the form of an ELUC. The ELUC must establish the necessary restrictions and requirements in accordance with 35 IAC 742.1010 for AOC-1, AOC-2, and AOC-3. The ELUC must include the following requirements specified in Condition III.C.2.
2. Upon completion of all required corrective action requirements, the closure of the HWMUs will meet the requirements of 35 IAC 724.211 and 724.215. As such, a Certification of Completion of RCRA Closure Form must be submitted to the Illinois EPA, as specified in Condition IV.43. This form is provided on Page E-1, Attachment E of this permit.

G. REQUIREMENTS FOR ADDRESSING NEWLY IDENTIFIED SWMU(S)

1. The Permittee shall notify the Illinois EPA in writing of any newly identified SWMU(s) and/or AOC(s) discovered during the course of groundwater monitoring, field investigations, environmental audits, or other means, no later than thirty (30) days after discovery. The notification shall provide the following information, as available:
 - a. The location of the newly identified SWMU(s) and/or AOC(s) in relation to other SWMU(s) or AOC(s) on a scaled map or drawing;
 - b. The type and past and present function of the unit;
 - c. The general dimensions, capacities, and structural description of the unit (available drawings and specifications provided);
 - d. The period during which the unit was operated;
 - e. The specifics on all materials, including but not limited to, wastes and hazardous constituents, that have been or are being managed at the SWMU(s)/AOC(s), to the extent available; and
 - f. The results of any relevant available sampling and analysis which may aid in determining whether releases of hazardous wastes or hazardous constituents have occurred or are occurring from the unit.
2. If the submitted information demonstrates a potential for a release of hazardous waste or hazardous waste constituents from the newly identified SWMU(s)/AOC(s), the Illinois EPA may request in writing, that the Permittee prepare a SWMU Assessment Plan and a proposed schedule of implementation and completion of the Plan for any additional SWMU(s) discovered subsequent to the issuance of this permit. This SWMU Assessment Plan must also propose investigations, including field investigations, if necessary, to determine the release potential to specific environmental media for the newly identified SWMU/AOC. The SWMU Assessment Plan must demonstrate that the sampling and analysis program, if applicable, is capable of yielding representative samples and must include parameters sufficient to identify migration of hazardous waste and hazardous constituents from the newly identified SWMU(s)/AOC(s) to the environment.

3. Within 90 days after receipt of the Illinois EPA's request for a SWMU Assessment Plan, the Permittee shall submit a SWMU Assessment Plan to the Illinois EPA for review and approval.
4. After the Permittee submits the SWMU Assessment Plan, the Illinois EPA shall either approve, conditionally approve, or disapprove the Plan in writing. If the Plan is approved, the Permittee shall begin to implement the Plan within 45 days of receiving such written notification or according to the terms and schedule established within the Plan and any conditions placed on it. If the Plan is disapproved, the Illinois EPA shall notify the Permittee in writing of the Plan's deficiencies and specify a due date for submittal of a revised plan.
5. The Permittee shall submit a report documenting the results of the approved SWMU Assessment Plan to the Illinois EPA in accordance with the schedule in the approved SWMU Assessment Plan. The SWMU Assessment Report shall describe all results obtained from the implementation of the approved SWMU Assessment Plan.
6. Additional investigation plans and reports must be submitted to and approved by the Illinois EPA, as necessary, to ensure the nature and extent of contamination at the SWMU/AOC is adequately characterized. Once the contamination is characterized, the Permittee shall develop remedial objectives for the SMWU/AOC in accordance with 35 IAC Part 742; such objectives are subject to the Illinois EPA review and approval.
7. The Permittee must implement a Corrective Measures Program (CMP), as necessary, to properly address any contamination encountered during the assessment. Guidance regarding the implementation of this program will be provided at the time the Illinois EPA notifies the Permittee of the need for such a program.
8. All efforts carried out at newly identified SWMU(s)/AOC(s) must meet the requirements of 35 IAC 724.201.

H. FUTURE RELEASES FROM SWMUS

1. There exists a potential that a release may occur in the future from SWMUs identified in the RCRA Facility Assessment (RFA) which did not require any corrective action at the time that the RFA or RCRA Facility Investigation (RFI) was completed. If the Permittee discovers that a release has occurred from such a SWMU in the future, then the Illinois EPA must be notified of this release within thirty (30) days after its discovery following the procedures set forth in Condition

II.F.1. Additional investigation and, as necessary, corrective measures efforts at this SWMU must be carried out in accordance with the procedure set forth in Condition II.F.2. The results of all corrective action efforts required by this condition must meet the requirements of 35 IAC 724.201.

I. INTERIM MEASURES/STABILIZATION

The Permittee shall carry out interim measures/stabilization activities to prevent or mitigate the migration of a release of hazardous substances into the environment, and to provide adequate protection to human health and the environment.

1. At any time during the corrective action process, the Permittee may initiate interim measures for the purpose of preventing continuing releases and/or mitigating the results of releases and/or mitigating the migration of hazardous wastes or hazardous constituents. It shall not be necessary to conduct all phases of a RFI or a Corrective Measures Study (CMS) prior to implementing an interim measure if the Illinois EPA and the Permittee agree that a problem can be corrected, or a release cleaned up, without additional study and/or without a formal CMS.
2. Prior to implementing any interim measures, the Permittee must submit detailed information regarding the proposed interim measure to the Illinois EPA for approval. This information shall include, at a minimum:
 - a. Objectives of the interim measures; how the measure is mitigating a potential threat to human health and the environment and/or is consistent with and integrated into any long-term solution at the facility;
 - b. Design, construction, and maintenance requirements;
 - c. Schedules for design and construction; and
 - d. Schedules for progress reports.
3. If the Illinois EPA determines that a release cannot be addressed without additional study and/or a formal CMS, then the Illinois EPA will notify the Permittee that these must be performed. Any proposal made under this provision or any other activity.
4. If the Illinois EPA determines that interim measures are necessary to protect human health or the environment, the Permittee will be notified by way of a permit modification.

5. Consistent with the annual reporting requirements of this permit, the Permittee shall submit a report assessing the effectiveness of any interim measures being carried out in accordance with this permit. Based on a review of this report, the Illinois EPA reserves the right to require additional interim measures be carried out if it is determined that the interim measure is unable to protect human health and the environment. This annual report should at a minimum contain the following information regarding each system which comprises the interim measure:
 - a. A discussion of each system's operation during the year. This discussion should address: (1) actual daily, weekly and monthly flow rates through each system; (2) any periods when the systems were not operating; and (3) deviations from the design operating procedures for the system (such as problems with drawing an adequate vacuum, downtime due to equipment failure, etc.);
 - b. Results of all monitoring efforts carried out during the year;
 - c. A discussion of the effectiveness of the system supported as appropriate with data and calculations; and
 - d. Recommended changes, if any, which should be made to the system to improve its effectiveness.
6. The Illinois EPA reserves the right to require the Permittee to remove or treat soil if the Illinois EPA determines that contaminants are present in the soils at levels such that the remediation system is unable to protect human health and the environment. Remediation objectives for corrective measures will be established by the Illinois EPA at a later date.
7. The interim measure approved for a SWMU or AOC may not be sufficient to meet the final requirements for corrective action for remediation for the unit. The adequacy of the interim measure will be addressed upon the Illinois EPA review and approval of the RFI reports and the CMP, as required by this permit. As such, the Permittee may be required to expand this interim measure as necessary to address existing or additional contamination detected through RFI investigations.
8. The Illinois EPA reserves the right to require revision and modification of the interim measures implemented by the facility should it be determined by the Illinois EPA through information obtained through facility monitoring that the interim measures approved by this portion of the permit are ineffective in protecting human health and the environment.

J. REPORTING REQUIREMENTS

1. A Corrective Action Progress Report must be submitted summarizing the corrective action efforts completed during each quarter of the calendar year. This report must also contain a general description of the corrective action efforts to be completed during the next quarter of the calendar year.

- a. The reports should be submitted in accordance with the following schedule:

Reporting Period	Report to be Submitted by the following
January-March	May 1
April-June	August 1
July-September	November 1
October-December	March 1*

*Included in Annual Report required in Condition II.J.2 below.

- b. Each Corrective Action Progress Report must contain:
 - (1) A summary of activities completed at each parcel during the quarter, including information regarding the amount of free product/groundwater/leachate removed on a weekly basis from various units during the quarter;
 - (2) A discussion of any problems encountered while conducting corrective action at each parcel during the quarter; and
 - (3) A summary of the activities anticipated to be carried out during the next quarter.
2. A report must be submitted to the Illinois EPA by March 1 of each year which summarizes corrective action program activities completed at the facility during the previous calendar year (i.e., the previous January 1 to December 31). This report must contain a compilation/summary of the information in the quarterly reports for the year, what was completed during the year, and what must still be done in the next year and in the following years.
3. Final reports must be submitted to the Illinois EPA for review and approval when corrective action is complete for a given parcel. Such reports must be certified by a qualified Illinois licensed Professional Engineer (P.E.) and a person of authority from the Permittee. This certification must meet the requirements of 35 IAC

702.126. These reports must be detailed in nature and contain sufficient information which (1) describes in detail, all investigation/remediation efforts carried out in the parcel; and (2) the efforts were carried out in accordance with the approved plan and this permit.

K. COST ESTIMATES/FINANCIAL ASSURANCE FOR CORRECTIVE ACTION

1. The current cost estimate for completing corrective action and groundwater remediation by the facility including 10% contingency is \$3,553,000.00 in 2023 dollars. The Permittee shall prepare an updated cost estimate for the completion of any corrective action required under this permit in order to provide financial assurance for completion of corrective action and for the approved amount of that cost estimate as required by Condition III.D.1. The cost estimate for completing corrective action required in this permit must include 10% contingency. Such a cost estimate must be based upon the cost of contamination investigations and assessments for the AOCs, and design, construction, operation, inspection, monitoring, and maintenance of the corrective measure(s) to meet the requirements of 35 IAC 724.201 and this permit. These estimates must be based upon third party costs. The updated cost estimate for corrective action must be submitted to the Illinois EPA annually by January 1.
2. The Permittee shall prepare a revised cost estimate in 2025 dollars for any corrective action required under this permit in order to provide financial assurance for the approved amount of that cost estimate as required by Condition III.D.1 and must include 10% contingency within 90 days of the date of the effective date of this permit, as required under 35 IAC 724.201(b). Such a cost estimate must be based upon the cost of contamination investigations and assessments for the AOCs, and design, construction, operation, inspection, monitoring, and maintenance of the corrective measure(s) to meet the requirements of 35 IAC 724.201 and this permit. These estimates must be based upon third party costs.
3. The Permittee shall demonstrate continuous compliance with 35 IAC 724.201 by providing documentation of financial assurance using a mechanism specified in 35 IAC 724.243, in at least the amount of the cost estimate required under Condition II.K.1. The documentation shall be submitted to the Illinois EPA within 60 days after the submittal of the initial or revised cost estimates required under Condition II.K.1. The Illinois EPA may accept financial assurance for completion of corrective action in combination with another financial mechanism that is acceptable under 35 IAC 724.246 at its discretion.

4. All cost estimates prepared under the requirements of Conditions II.K.1 through II.K.3 must be submitted as a Class 1* permit modification request in accordance with 35 IAC 703.281.
5. Financial assurance for corrective action must be updated, as necessary, to reflect the current status of the RCRA corrective action program at this facility. In addition, this financial assurance must be adjusted annually for inflation.

SECTION III: SPECIAL CONDITIONS

A. REQUIRED FORMS

1. The Permittee shall provide a completed Illinois EPA permit application form LPC-PA23 with permit modification requests, permit applications, and additional information that are submitted to the Illinois EPA.
2. The Permittee shall submit a current 39(i) certification and supporting documentation with all applications for a permit.

B. REPOSITORY

1. The Permittee shall maintain a repository at the Cicero Public Library, located at 5225 West Cermak Road, Cicero, Illinois.
 - a. A copy of the approved RCRA corrective action permit.
 - b. All permit applications and permit modification requests.
 - c. All Illinois EPA responses to modification requests made to the RCRA corrective action permit (Log No. B-218).

C. ENVIRONMENTAL LAND USE CONTROL

1. Within 60 days of the permit issuance date, a certified true copy of the recorded ELUC identified in Condition II.B.8, along with a report documenting that all the conditions listed in the ELUC are met, must be submitted to the Illinois EPA.
2. The ELUC(s) to be established for the three AOCs must place the following restrictions, at a minimum, on the future activities of the subject property:
 - a. The property will only be used for commercial/industrial purposes in the future;
 - b. The conditions of the Groundwater Ordinance #97112501 for the Town of Cicero, Illinois, prohibiting the use of groundwater as a potable water supply, must continue to be met;
 - c. Any contaminated groundwater that is removed or extracted from the property must be handled in accordance with all applicable laws and regulations;

- d. A Worker Caution and Construction Safety plan must be in place for any future excavation and/or construction on the subject property to restrict the direct worker ingestion and inhalation exposures with any impacted soils and groundwater;
- e. In accordance with 35 IAC 742.505(b)(2)(c) and 742.1000(a)(9), all buildings intended for worker occupancy that are constructed on the property must include a full concrete slab-on-grade or a full concrete basement floor and wall with a minimum thickness of 4-inches. Any natural or man-made pathways from the sub-surface, such as a sump, may not be located inside the building;
- f. Any engineered barrier(s) pre-existing or to be constructed on the property must remain over the contaminated soils. The engineered barrier(s) must be properly maintained;
- g. Any building constructed at the facility must have a building control technology meeting the requirements of 35 IAC 742, Subpart L; and
- h. Soil excavated during construction/demolition/excavation activities within the property must be evaluated to determine if it is contaminated.
 - i. If the soil is found to be contaminated, then it must be sent off-site for disposal in accordance with any applicable rules and regulations including but not limited to 35 IAC, Subtitle G: Waste Disposal.
 - ii. If the soil is uncontaminated, as determined by visual inspection and field screening, then it may be used as fill in other areas of the property. However, procedures must be in place to ensure that this material remains on the property and is not to be transported off-site, unless it is transported off-site in accordance with any applicable rules and regulations including but not limited to 35 IAC, Subtitle G: Waste Disposal.
 - iii. Documentation of all these activities must be placed in the property owner's (or any subsequent property owner's or property owner's heirs, grantees, successors, assigns, transferees and any other owner, occupant, lessee, possessor or user of the property or the holder of any portion thereof or interest therein, at the time of the activity) operating record.

D. COMPLIANCE SCHEDULE

1. The Permittee must prepare and submit an updated cost estimate for the completion of any corrective action required under this permit in order to provide financial assurance for the approved amount of that cost estimate within ninety (90) days of the date of the effective date of this permit, as required in accordance with 35 IAC 724.201. This cost estimate must include a minimum of 10% contingency for all items necessary to complete corrective action.

SECTION IV: STANDARD CONDITIONS

GENERAL REQUIREMENTS

1. **EFFECT OF PERMIT.** The existence of a RCRA permit shall not constitute a defense to a violation of the Environmental Protection Act (Act) or Subtitle G, except for development, modification or operation without a permit. Issuance of this permit does not convey property rights or any exclusive privilege. Issuance of this permit does not authorize any injury to persons or property or invasion of other private rights, or infringement of state or local law or regulations. (35 IAC 702.181)
2. **PERMIT ACTIONS.** This permit may be modified, reissued or revoked for cause as specified in 35 IAC 703.270 through 703.273 and 702.186. The filing of a request by the Permittee for a permit modification or reissuance, or a notification of planned changes or anticipated noncompliance on the part of the Permittee does not stay the applicability or enforceability of any permit condition. (35 IAC 702.146)
3. **SEVERABILITY.** The provisions of this permit are severable, and if any provision of this permit, or the application of any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances and the remainder of this permit shall not be affected thereby. (35 IAC 705.202)
4. **PERMIT CONDITION CONFLICT.** In case of conflict between a special permit condition and a standard condition, the special condition will prevail. (35 IAC 702.160)
5. **DUTY TO COMPLY.** The Permittee shall comply with all conditions of this permit except for the extent and for the duration such noncompliance is authorized by an emergency permit. Any permit noncompliance constitutes a violation of the Act and is grounds for enforcement action; permit revocation or modification; or for denial of a permit renewal application. (35 IAC 702.141 and 703.242)
6. **DUTY TO REAPPLY.** If the Permittee wishes to continue an activity allowed by this permit after the expiration date of this permit, the Permittee must apply for a new permit at least 180 days before this permit expires, unless permission for a later date has been granted by the Illinois EPA. (35 IAC 702.142 and 703.125)
7. **PERMIT EXPIRATION.** This permit and all conditions herein will remain in effect beyond the permit's expiration date if the Permittee has submitted a timely, complete application (see 35 IAC 703.181-703.209) and through no fault of the Permittee the Illinois EPA has not issued a new permit as set forth in 35 IAC 702.125.

8. **NEED TO HALT OR REDUCE ACTIVITY NOT A DEFENSE.** It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. (35 IAC 702.143)
9. **DUTY TO MITIGATE.** In the event of noncompliance with the permit, the Permittee shall take all reasonable steps to minimize releases to the environment and shall carry out such measures as are reasonable to prevent significant adverse impacts on human health or the environment. (35 IAC 702.144)
10. **PROPER OPERATION AND MAINTENANCE.** The Permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the Permittee to achieve compliance with the conditions of this permit. Proper operation and maintenance include effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory, and process controls, including appropriate quality assurance procedures. This provision requires the operation of back-up or auxiliary facilities or similar systems only when necessary to achieve compliance with the conditions of the permit. (35 IAC 702.145)
11. **DUTY TO PROVIDE INFORMATION.** The Permittee shall furnish to the Illinois EPA, within a reasonable time, any relevant information which the Illinois EPA may request to determine whether cause exists for modifying, revoking and reissuing or terminating this permit, or to determine compliance with this permit. The Permittee shall also furnish to the Illinois EPA, upon request, copies of records required to be kept by this permit. (35 IAC 702.148)
12. **INSPECTION AND ENTRY.** The Permittee shall allow an authorized representative of the Illinois EPA, upon the presentation of credentials and other documents as may be required by law, to:
 - a. Enter at reasonable times upon the Permittee's premises where a regulated facility or activity is located or conducted, or where records must be kept under the conditions of this permit;
 - b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
 - c. Inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this permit; and

- d. Sample or monitor, at reasonable times, for the purposes of assuring permit compliance or as otherwise authorized by the appropriate Act, any substances or parameters at any location. (35 IAC 702.149)

13. MONITORING AND RECORDS. (35 IAC 702.150)

- a. Samples and measurements taken for the purpose of monitoring shall be representative of the monitored activity. The method used to obtain a representative sample of the waste must be the appropriate method from 35 IAC 721, Appendix A. Laboratory methods must be those specified in Test Methods for Evaluating Solid Waste: Physical/Chemical Methods, SW-846, latest versions; Methods for Chemical Analysis of Water and Wastes, EPA-600/4-79-020, latest versions; or an equivalent method as specified in the approved Waste Analysis Plan.
- b. The Permittee shall retain records of all monitoring information, including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, copies of all reports and records required by this permit, and records of all data used to complete the application for this permit for a period of at least three (3) years from the date of the sample, measurement, report or application. These periods may be extended by request of the Illinois EPA at any time. The Permittee shall maintain records from all groundwater monitoring wells and associated groundwater surface elevations, for the active life of the facility, and for disposal facilities for the post-closure care period as well.
- c. Records of monitoring information shall include:
 - i. The date(s), exact place, and time of sampling or measurements;
 - ii. The individual(s) who performed the sampling or measurements;
 - iii. The date(s) analyses were performed;
 - iv. The individual(s) who performed the analyses;
 - v. The analytical technique(s) or method(s) used; and
 - vi. The result(s) of such analyses. (35 IAC 702.150)

14. **REPORTING PLANNED CHANGES.** The Permittee shall give written notice to the Illinois EPA as soon as possible of any planned physical alterations or additions to the permitted facility. In general, proposed changes to the facility will need to be submitted to the Illinois EPA as permit modification request that complies with the requirements of 35 IAC 703.280. (35 IAC 702.152(a))
15. **CONSTRUCTION CERTIFICATION.** For a new hazardous waste management facility, the permittee shall not commence treatment, storage, or disposal of hazardous waste; and for a facility being modified the Permittee shall not treat, store or dispose of hazardous waste in the modified portion of the facility, until:
 - a. The Permittee has submitted to the Illinois EPA by certified mail or hand delivery a letter signed by the Permittee and a qualified Illinois licensed P.E. stating that the facility has been constructed or modified in compliance with the permit; and
 - b. The Illinois EPA has inspected the modified or newly constructed facility and finds it is in compliance with the condition of the permit; or

If, within 15 days of the date of submission of the letter in paragraph (a), the Permittee has not received notice from the Illinois EPA of its intent to inspect, prior inspection is waived, and the Permittee may commence treatment, storage, or disposal of hazardous waste. (35 IAC 703.247)
16. **ANTICIPATED NONCOMPLIANCE.** The Permittee must give advanced written notice to the Illinois EPA of any planned changes in the permitted facility or activity which may result in noncompliance with permit requirements, regulations, or the Act. (35 IAC 702.152(b))
17. **TRANSFER OF PERMITS.** This permit may not be transferred by the Permittee to a new Owner or Operator unless the permit has been modified or reissued pursuant to 35 IAC 703.260(b) or 703.272. Changes in the ownership or operational control of a facility must be made as a Class 1 modification with the prior written approval of the Illinois EPA. The new Owner or Operator shall submit a revised permit application no later than ninety (90) days prior to the scheduled change. (35 IAC 703.260)
18. **MONITORING REPORTS.** Monitoring results shall be reported at the intervals specified in the permit. (35 IAC 702.152(d))
19. **COMPLIANCE SCHEDULES.** Reports of compliance or noncompliance with, or any progress reports on, interim and final requirements contained in any compliance schedule of this permit shall be submitted no later than specified in 35 IAC 702.162. (35 IAC 702.152(e))

20. TWENTY-FOUR HOUR REPORTING.

- a. The Permittee shall report to the Illinois EPA any noncompliance with the permit which may endanger human health or the environment. Any such information shall be reported orally within twenty-four (24) hours from the time the Permittee becomes aware of the following circumstances. This report shall include the following:
 - i. Information concerning the release of any hazardous waste that may cause an endangerment to public drinking water supplies.
 - ii. Information concerning the release or discharge of any hazardous waste or of a fire or explosion at the hazardous waste management facility, which could threaten the environment or human health outside the facility.
- b. The description of the occurrence and its cause shall include:
 - i. Name, address, and telephone number of the Owner or Operator;
 - ii. Name, address, and telephone number of the facility;
 - iii. Date, time, and type of incident;
 - iv. Name and quantity of material(s) involved;
 - v. The extent of injuries, if any;
 - vi. An assessment of actual or potential hazards to the environment and human health outside the facility, where applicable; and
 - vii. Estimated quantity and disposition of recovered material that resulted from the incident.
- c. A written submission shall also be provided within five (5) days of the time the Permittee becomes aware of the circumstances. The written submission shall contain a description of the noncompliance and its cause; the period of noncompliance including exact dates and times and if the noncompliance has not been corrected; the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent recurrence of the noncompliance. The Illinois EPA may waive the five (5) day written notice requirement in favor of a written report within fifteen (15) days. (35 IAC .152(f) and 703.245(b)).

21. **OTHER NONCOMPLIANCE.** The Permittee shall report all instances of noncompliance not otherwise required to be reported under Standard Conditions IV.16, IV.19 and IV.20, at the time monitoring reports, as required by this permit, are submitted. The reports shall contain the information listed in Condition IV.20. (35 IAC 702.152(g)).
22. **OTHER INFORMATION.** Where the Permittee becomes aware that it failed to submit any relevant facts in the permit application or submitted incorrect information in a permit application or in any report to the Illinois EPA, the Permittee shall promptly submit such facts or information. (35 IAC 702.152(h))
23. **SUBMITTAL OF REPORTS OR OTHER INFORMATION.** All written reports or other written information required to be submitted by the terms of this permit shall be sent to:

 Illinois Environmental Protection Agency
 Bureau of Land #33
 Permit Section
 2520 West Iles Avenue
 Post Office Box 19276
 Springfield, Illinois 62794-9276
24. **SIGNATORY REQUIREMENT.** All permit applications, reports or information submitted to the Illinois EPA shall be signed and certified as required by 35 IAC 702.126. (35 IAC 702.151)
25. **CONFIDENTIAL INFORMATION.** Any claim of confidentiality must be asserted in accordance with 35 IAC 702.103 and 35 IAC Part 161.
26. **DOCUMENTS TO BE MAINTAINED AT FACILITY SITE.** The Permittee shall maintain at the facility, until closure is complete, the following documents and amendments, revisions, and modifications to these documents:
 - a. Post-closure plan as required by 35 IAC 724.218(a) and this permit.
 - b. Cost estimate for facility closure as required by 35 IAC 724.242(d) and this permit.
 - c. Operating record as required by 35 IAC 724.173 and this permit.
 - d. Inspection schedules as required by 35 IAC 724.115(b) and this permit.

GENERAL FACILITY STANDARDS

27. **GENERATOR REQUIREMENTS.** Any hazardous waste generated at this facility shall be managed in accordance with the generator requirements at 35 IAC Part 722.
28. **SECURITY.** The Permittee shall comply with the security provisions of 35 IAC 724.114(b) and (c).
29. **GENERAL INSPECTION REQUIREMENTS.** The Permittee shall follow the approved inspection schedule. The Permittee shall remedy any deterioration or malfunction discovered by an inspection as required by 35 IAC 724.115(c). Records of inspections shall be kept as required by 35 IAC 724.115(d).
30. **CLOSURE REQUIREMENTS FOR ACCUMULATION AREAS.** The Permittee shall close containers storage areas, tanks, drip pads, or containment buildings used for the accumulation of on-site generated hazardous waste in accordance with the requirements identified at 35 IAC 722.117(a)(8).

PREPAREDNESS AND PREVENTION

31. **DESIGN AND OPERATION OF FACILITY.** The Permittee shall maintain and operate the facility to minimize the possibility of fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment. (35 IAC 724.131)
32. **REQUIRED EQUIPMENT.** The Permittee shall equip the facility with the equipment set forth in the approved contingency plan, as required by 35 IAC 724.132.
33. **TESTING AND MAINTENANCE OF EQUIPMENT.** The Permittee shall test and maintain the equipment specified in the contingency plan and this permit as necessary to assure its proper operation in time of emergency. Such testing and maintenance activities are set forth in the approved inspection schedule. (35 IAC 724.133)
34. **ACCESS TO COMMUNICATIONS OR ALARM SYSTEM.** The Permittee shall maintain access to the communications or alarm system as required by 35 IAC 724.134.
35. **REQUIRED AISLE SPACE.** The Permittee shall maintain aisle space as required by 35 IAC 724.135 and National Fire Protection Association (NFPA) requirements.
36. **ARRANGEMENTS WITH STATE AND LOCAL AUTHORITIES AND EMERGENCY RESPONSE CONTRACTORS.** The Permittee shall attempt to make emergency response arrangements with State and local authorities and agreements with State emergency response teams

and emergency response contractors and equipment suppliers as required by 35 IAC 724.137. If State or local officials refuse to enter in preparedness and prevention arrangements with the Permittee, the Permittee must document this refusal in the operating record.

RECORD KEEPING

37. **OPERATING RECORD.** The Permittee shall maintain a written operating record at the facility in accordance with 35 IAC 724.173.

CLOSURE

38. **PERFORMANCE STANDARD.** The Permittee must close the facility as required by 35 IAC 724.211 and in accordance with the approved closure plan.
39. **AMENDMENT TO CLOSURE PLAN.** The Permittee must amend the closure plan whenever there is a change in the expected year of closure or whenever a change in the facility operation plans or facility design affects the closure plan pursuant to 35 IAC 724.212(c).
40. **NOTIFICATION OF CLOSURE.** The Permittee must notify the Illinois EPA at least 45 days prior to the date it expects to begin closure. (35 IAC 724.212(d))
41. **TIME ALLOWED FOR CLOSURE.** After receiving the final volume of hazardous waste, the Permittee must treat or remove from the site all hazardous waste and complete closure activities in accordance with the schedule(s) specified in the closure plan. (35 IAC 724.213)
42. **DISPOSAL AND/OR DECONTAMINATION OF EQUIPMENT.** When closure is completed, the Permittee must decontaminate and/or dispose of all facility equipment and structures as required by the approved closure plan. (35 IAC 724.214)
43. **CERTIFICATION OF CLOSURE.** When closure is completed, the Permittee must submit certification to the Illinois EPA in accordance with 35 IAC 724.215 that the facility has been closed as specified by the approved closure plans.

44. **COST ESTIMATE FOR FACILITY CLOSURE.** The Permittee's original closure cost estimate, prepared in accordance with 35 IAC 724.242, must be:
- a. Adjusted for inflation 60 days prior to the anniversary date of the establishment of the financial instrument(s) used to comply with Section 724.243. However, if the Owner/Operator is using the financial test or corporate guarantee, it must be updated for inflation within 30 days after close of the firm's fiscal year, and before the submission of updated information to the Illinois EPA as specified in Section 724.243(f).
 - b. Revised no later than 30 days after the Illinois EPA has approved a request to modify the closure plan, if the change in the closure plan increases the cost of closure.
 - c. Kept on record at the facility and updated. (35 IAC 724.242)
 - d. Made immediately available to Illinois EPA personnel upon Illinois EPA request.
45. **FINANCIAL ASSURANCE FOR FACILITY CLOSURE.** The Permittee must demonstrate compliance with 35 IAC 724.243 by providing documentation of financial assurance, as required by 35 IAC 724.251, in at least the amount of the cost estimates required by Condition IV.43. Changes in financial assurance mechanisms must be approved by the Illinois EPA pursuant to 35 IAC 724.243.

Financial assurance documents submitted to Illinois EPA should be directed to the following address:

Illinois Environmental Protection Agency
Bureau of Land #24
Materials Management and Compliance Section
2520 West Iles Avenue
P.O. Box 19276
Springfield, IL 62794-9276

46. **LIABILITY REQUIREMENTS.** The Permittee must demonstrate continuous compliance with the requirements of 35 IAC 724.247 and the documentation requirements of 35 IAC 724.251.
47. **INCAPACITY OF OWNERS OR OPERATORS, GUARANTORS, OR FINANCIAL INSTITUTIONS.** The Permittee must comply with 35 IAC 724.248 whenever necessary.

LAND DISPOSAL RESTRICTIONS

48. **DISPOSAL PROHIBITION.** Any waste identified in 35 IAC 728, Subpart C, or any mixture of such a waste with nonrestricted wastes, is prohibited from land disposal unless it meets the standards of 35 IAC 728, Subpart D, or unless it meets the requirements for exemptions under 35 IAC 728, Subpart C. "Land disposal" means placement in or on the land and includes, but is not limited to, placement in a landfill, surface impoundment, waste pile, injection well, land treatment facility, or vault intended for disposal.
49. **DILUTION PROHIBITION.** The Permittee must not in any way dilute a restricted waste or residual from treatment of a restricted waste as a substitute for adequate treatment in order to achieve compliance with 35 IAC 728, Subpart D (35 IAC 728.103).
50. **WASTE ANALYSIS.**
 - a. The Permittee must test his waste or extract developed, using the test method identified in Title 40 Code of Federal Regulations (CFR) 268, Appendix I, or use knowledge of the waste, to determine if the waste is restricted from land disposal.
 - b. For any waste with treatment standards expressed as concentrations in the waste extract, the Permittee must test the treatment residues, or an extract of such residues developed using the test method described in 40 CFR 268, Appendix I, to assure that the treatment residues or extract meet the applicable treatment standard.
 - c. If the treatment residues do not meet the treatment standards, or if the Permittee ships any restricted wastes to a different facility, the Permittee shall comply with the requirements applicable to generators in 35 IAC 728.107 and 728.150(a)(1).
51. **STORAGE RESTRICTIONS.**
 - a. The Permittee must not store hazardous wastes restricted from land disposal under 35 IAC 728, Subpart C unless such wastes are stored only in containers or tanks, and are stored solely for the purpose of the accumulation of such quantities as is necessary to facilitate proper recovery, treatment, or disposal, and: (1) each container is clearly marked to identify its contents and the date each period of accumulation begins; (2) each tank is clearly marked to identify its contents, the quantity of each hazardous waste received, and the date each period of accumulation begins, as required by 35 IAC 728.150.

- b. The Permittee must comply with the operating record requirements of 35 IAC 724.173.

- 52. NEW DETERMINATIONS OF PROHIBITED WASTES. Wastes which are prohibited from land disposal under 35 IAC 728, Subpart C, or for which treatment standards have been established under 35 IAC 728, Subpart D, subsequent to the date of issuance of this permit, shall be subject to Conditions IV.48 through IV.51.

POST-CLOSURE

- 53. CARE AND USE OF PROPERTY. The Permittee shall provide post-closure care for the facility as required by 35 IAC 724.217 and in accordance with the approved post-closure plan.
- 54. AMENDMENT TO POST-CLOSURE PLAN. The Permittee must amend the post-closure plan whenever a change in the facility operation plans, or facility design affects the post-closure plan or when an unexpected event has occurred which has affected the post-closure plan pursuant to 35 IAC 724.218(d).
- 55. COST ESTIMATE FOR POST-CLOSURE. The Permittee's original post-closure cost estimate, prepared in accordance with 35 IAC 724.244, must be:
 - a. Adjusted for inflation either 60 days prior to each anniversary of the date on which the first closure cost estimate was prepared or if using the financial test or corporate guarantee, within 30 days after close of the firm's fiscal year.
 - b. Revised whenever there is a change in the facility's post-closure plan increasing the cost of closure.
 - c. Kept on record at the facility and updated. (35 IAC 724.244).
 - d. Maintained at the value approved by the Illinois EPA with annual adjustment for inflation and cannot be decreased unless approved by the Illinois EPA in a permit modification.

56. **FINANCIAL ASSURANCE FOR POST-CLOSURE CARE.** The Permittee shall demonstrate compliance with 35 IAC 724.245 and 35 IAC 703.241(a)(2) by providing documentation of financial assurance, as required by 35 IAC 724.251, in at least the amount of the cost estimates required by Condition IV.55. This financial assurance must be maintained at such value throughout the post-closure care period and must be adjusted accordingly pursuant to Condition IV.55. Changes in financial assurance mechanisms must be approved by the Illinois EPA pursuant to 35 IAC 724.245.

Financial assurance documents submitted to the Illinois EPA should be directed to the following address:

Illinois Environmental Protection Agency
Bureau of Land #24
Materials Management and Compliance Section
2520 West Iles Avenue
P.O. Box 19276
Springfield, IL 62794-9276

57. **INCAPACITY OF OWNERS OR OPERATORS, GUARANTORS, OR FINANCIAL INSTITUTIONS.** The Permittee shall comply with 35 IAC 724.248 whenever necessary.

SECTION V: REPORTING AND NOTIFICATION REQUIREMENTS

The reporting and notification requirements of each section of the RCRA permit are summarized below. This summary table is provided to "highlight" the various reporting and notification requirements of this permit.

Condition	Action	Due Date
Section II: Corrective Action		
A.7, B.6, C	General corrective action and groundwater Reports/Work plans/Submittals	As specified in Illinois EPA letters.
C.1.b	GMZ Re-Evaluation	Every five (5) years.
G.1	Notification of Newly Identified SWMU(s)/AOC(s)	Within 30 days of discovery
G.3	Submittal of Assessment Plan for Newly Identified SWMU	Within 90 days of request for plan from Illinois EPA
G.5	Submittal of SWMU Assessment Report for Newly Identified SWMU	In accordance with schedule in assessment plan
H.1	Notification of Release from Existing SWMU	Within 30 days of discovery
J.1.a	Quarterly Corrective Action Progress Report: January - March April - June July - September October - December	May 1 August 1 November 1 March 1
J.2	Annual Report of Corrective Action Program Activities with Quarterly Report for October - December	March 1 of each year
J.3	Final Report for each parcel/area	As corrective action is completed
J.5	Interim measures annual report	Annually
K.1	Annual Cost Estimate for Corrective Action	January 1 of each year
Section III: Special Conditions		
A.1	Submission of LPC-PA23 form	With all additional information, permit

		modifications, and permit applications
A.2	Submission of 39i certification form	With all permit applications
C.1	Submission of certified true copy of the recorded ELUC	Within 60 days of the date of the effective date of this permit
D.1	Cost estimate for corrective action activities	Within 90 days of the date of the effective date of this permit
Section IV: Standard Conditions		
6	Submission of complete application for a new permit	At least 180 days prior to permit expiration
11	Information requested by the Illinois EPA and copies of records required to be kept by this permit	Within a reasonable time
14	Notify the Illinois EPA of planned physical alterations or additions	As soon as possible
16	Notify the Illinois EPA of changes which may result in permit noncompliance	As soon as possible
17	Application for permit modification indicating permit is to be transferred	At least 90 days prior to transfer date
19	Submission of any information required in a compliance schedule	Within 14 days after each schedule date
20	Report to the Illinois EPA any non-compliance which may endanger health or environment:	
	By telephone	Within 24 hours after discovery
	In writing	Within five (5) days after discovery
21	Report all other instances of noncompliance	At the time monitoring reports are submitted
22	Information the Permittee failed to submit in an application; or corrected information	As soon as error is realized
39	Application for permit modification amending closure plan	60 days prior to proposed change, or no later than 60 days after unexpected event has occurred

40	Notify Illinois EPA date expected to begin closure	45 days prior to date expected for closure to begin
43	Submit closure certification	Within 60 days after completion of closure
44a	Adjusted cost estimate for closure	60 days prior to anniversary date of established financial assurance
44b	Revised cost estimate when closure plan has been modified	30 days after Illinois EPA has approved request
45	Changes in financial assurance mechanism for closure	As required by 35 IAC 724.243
46	Changes in coverage for sudden and non-sudden accidental occurrences	As required by 35 IAC 724.247
47 & 57	Notify Illinois EPA of commencement of voluntary or involuntary bankruptcy proceedings	Within ten (10) days after commencement of proceeding

ATTACHMENT A

IDENTIFICATION OF APPROVED PERMIT APPLICATION

HONEYWELL INTERNATIONAL, INC.

STATE ID NO. 0316000037

FEDERAL ID NO. ILD051937068

ATTACHMENT A: IDENTIFICATION OF APPROVED PERMIT APPLICATION

Document	Date	Date Received by the Illinois EPA	Log No.
RCRA corrective action permit application	October 26, 2023	October 27, 2023	B-218
Addendum 1	April 19, 2024	April 22, 2024	B-218
Addendum 2	May 16, 2025	May 19, 2025	B-218
Additional Information - submission of forms with signatures (LPC-PA23, 39i, and Part A permit application)	June 9, 2025	June 10, 2025	B-218

ATTACHMENT B

SITE MAPS & DRAWING OF PERMITTED UNITS

HONEYWELL INTERNATIONAL, INC.

STATE ID NO. 0316000037

FEDERAL ID NO. ILD051937068



Source: Background from ESRI online map service World Street Map

FIGURE 1

Site Location

Renewal Application for RCRA Corrective Action Only Permit
Former BBI Cicero, Cicero, IL



Jacobs



NOTES

1. No RCRA Solid Waste Management Units were identified on site. The former USI also a former Hazardous Waste Management Unit (HWMU) is shown on Figure 4 relative to other site features including the Former Solvent Center.
2. Locations noted with and asterisk (*) were not identified as HWMUs but were features of the Former Solvent Center.



FIGURE 3
Former Hazardous Waste Management Units
at the Former Solvent Center
Application for RCRA Permit for Corrective Action Only
Former BSI Chemicals, Clarendon, IL

Jacobs

Book 4 Address: San Francisco, CA 94102-1234

ATTACHMENT C

CHRONOLOGY OF CORRECTIVE ACTION ACTIVITIES

HONEYWELL INTERNATIONAL, INC.

STATE ID NO. 0316000037

FEDERAL ID NO. ILD051937068

ATTACHMENT C: CHRONOLOGICAL SUMMARY OF CORRECTIVE ACTION SUBMITTALS

The table below summarizes documentation submitted to the Illinois Environmental Protection Agency (Illinois EPA) in regard to corrective action efforts at the Honeywell Cicero facility.

Notes:

LTTD = Low Temperature Thermal Desorption

UST = Underground storage tank

DNAPL = dense non-aqueous phase liquid

GMZ = groundwater management zone

CCR = Current Conditions Report

ISTT = In-situ thermal treatment

NOD = Notice of Deficiency

SIR = Site investigation report

BBI = Baron-Blakeslee Inc.

Log No.	Document Name(s)	Status
B-11-CA-1	CCR	Approved December 29, 2005
B-11-CA-3	Remedial action completion report (ABC property)	Approved May 10, 2006
B-11-CA-4	Remedial action completion report	Approved May 10, 2006
B-11-CA-5	SIR for Former Paint Room	Approved May 2, 2007
B-11-CA-6	Free product recovery study report - second event	Approved April 11, 2007
B-11-CA-7	Remedial action plan – soil and groundwater	Approved August 18, 2008
B-11-CA-10	Sub-slab and air sampling work plan	Approved March 10, 2011
B-11-CA-11	Revised remedial action plan	Denied March 10, 2011
B-11-CA-12	Proposed well abandonment	Denied March 10, 2011
B-11-CA-13	Formal bedrock groundwater exclusion requirement	Denied March 10, 2011
B-11-CA-14	Notice and schedule of pre-remedial sampling on the former Kucera property and work plan proposal	Approved December 21, 2011
B-11-CA-16	Preliminary design report ISTT for residual DNAPL areas and GMZ	Approved December 21, 2011
B-11-CA-17	Basis of Design for Former Kucera Site Corrective Actions for Honeywell	Approved December 21, 2011
B-11-CA-18	January 2011 Vapor Intrusion Sealing and Sampling Activities Summary; and Preliminary Design-Vapor Intrusion Mitigation System	Approved December 21, 2011
B-11-CA-19	Former Kucera Disposal Property Corrective Actions CCR	Approved April 26, 2013

B-11-CA-20	Design Report - ISTT for residual DNAPL areas at Town of Cicero North Complex in Cicero, Illinois	Approved April 23, 2013
B-11-CA-21	Animal Welfare Building Vapor Intrusion Mitigation System Installation Report	Approved April 26, 2013
B-11-CA-22	Response to Illinois EPA April 26, 2013 letter (Log No. B-11-CA-19)	Approved January 29, 2014
B-11-CA-23	Response to a June 28, 2013 letter and a July 29, 2013 Technical Memorandum	Approved January 29, 2014
B-11-CA-24	Response to a June 28, 2013 letter and a July 29, 2013 Technical Memorandum	Approved January 29, 2014
B-11-CA-25	Response to Illinois EPA April 23, 2013 letter requesting clarification on design report for ISTT system	Approved April 10, 2015
B-11-CA-26	Establishment of GMZ and submission of additional information	Approved January 28, 2014
B-11-CA-27	Response to Illinois EPA January 28, 2014 letter requesting clarification on GMZ	Approved April 10, 2015
B-11-CA-28	Implementation plan and schedule update for construction and operation of ISTT system	Approved April 10, 2015
B-11-CA-29	Updated schedule for remedial activities	Approved April 10, 2015
B-11-CA-30	Area 2 Remedial Action Work Plan	Approved April 10, 2015
B-11-CA-31	Modification request to Illinois EPA April 10, 2015 letter for completing RCRA corrective action efforts at the Honeywell facility.	Approved November 2, 2015
B-11-CA-32	February 8, 2016 Technical Memorandum	Approved May 17, 2016
B-11-CA-33	GMZ well and site update; and GMZ modification request	Approved July 26, 2016
B-11-CA-34	Documentation of Completed GMZ Modification; and submission of additional information	Approved December 27, 2016
B-11-CA-35	Updated cost estimate for closure, schedule for Area 1 remediation, and groundwater sampling data	Approved February 10, 2017
B-11-CA-36	Updated cost estimate for closure, schedule for Area 1 remediation, and groundwater sampling data	Approved February 10, 2017
B-11-CA-37	In response to Illinois EPA November 2, 2015 letter including Former BBI Cicero Area 2 Remedial Action CCR	Approved February 1, 2017
B-11-CA-38	Former BBI Cicero ISTT CCR	Approved September 27, 2017

B-11-CA-39	ISTT Updates and Operations Report (Basis for Shutdown)	Under Illinois EPA review
B-11-CA-40	ISTT Updates and Operations Report (Basis for Shutdown)	Under Illinois EPA review
B-11-CA-41	ISTT Quarterly Report	N/A
B-11-CA-42	Response to Remedial Action Summary	Under Illinois EPA review
B-11-CA-43	Updated revisions to GMZ and groundwater monitoring wells	Approved October 3, 2018
B-11-CA-44	Vapor Intrusion Mitigation System Restoration and Restart Plan	Under Illinois EPA review
B-11-CA-45	ISTT and Decommissioning Report	Under Illinois EPA review
B-11-CA-47	Western Area Map Update	Under Illinois EPA review
B-11-CA-48	Updated post-closure/remediation cost estimate	Under Illinois EPA review
B-11-CA-49	GMZ Re-Evaluation	Denied December 22, 2020
B-11-CA-50	Closure/post-closure cost estimate for Western Area (2021)	Under Illinois EPA review
B-11-CA-51	Western Area Report and Work Plan	Under Illinois EPA review
B-11-CA-52	Updated closure/post-closure cost estimate for Western Area (2021)	Under Illinois EPA review
B-11-CA-53	Revised GMZ Re-Evaluation	Approved December 28, 2021
B-11-CA-54	Closure/post-closure cost estimate for Western Area (2022)	Under Illinois EPA review
B-11-CA-55	Proposal of abandonment of a groundwater monitoring well	Approved August 2, 2022
B-11-CA-56	Updated corrective action cost estimates for 2023	Under Illinois EPA review
B-11-CA-57	Western Area Supplemental SIR	Under Illinois EPA review
B-11-CA-58	Updated corrective action cost estimates for 2024	Under Illinois EPA review

ATTACHMENT D

CLOSURE AND CORRECTIVE ACTION COST ESTIMATES

HONEYWELL INTERNATIONAL, INC.

STATE ID NO. 0316000037

FEDERAL ID NO. ILD051937068

COST ESTIMATES AND FINANCIAL ASSURANCE REQUIREMENTS

1. The current corrective action costs are as follows:

CORRECTIVE ACTION	
DESCRIPTION	COST ESTIMATE (10% CONTINGENCY INCLUDED)
Western Area	\$ 2,310,000.00 (2023 dollars)
Former Solvent Center Building Restoration	\$ 55,000.00 (2023 dollars)
Groundwater Monitoring	\$ 1,188,000.00 (2023 dollars)
TOTAL (with 10% Contingencies)	\$ 3,553,000.00 (2023 dollars)

ATTACHMENT E

CERTIFICATION OF COMPLETION OF RCRA CLOSURE FORM

HONEYWELL INTERNATIONAL, INC.

STATE ID NO. 0316000037

FEDERAL ID NO. ILD051937068

CLOSURE CERTIFICATION STATEMENT

Honeywell International Inc.

Log No. B-218

To meet the requirements of Title 35 Illinois Administrative Code (35 IAC) 724.215, this statement is to be completed by both a responsible officer of the Owner or Operator (as defined in 35 IAC 702.126) and by a qualified Illinois licensed Professional Engineer (P.E.) upon completion of closure. Submit one (1) copy of the certification with original signatures and two (2) additional copies.

The hazardous waste management unit(s) at the facility described in this document has been closed in accordance with the specifications in the approved closure plan.

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

A 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 ILCS5/44(h))

USEPA ID Number

Facility Name

Signature of Owner/Operator Date
Responsible Officer

Name and Title of Owner/Operator

Signature of Licensed P.E. Date

Name of Licensed P.E. and Illinois License
Number

Mailing Address of P.E.:

Licensed P.E.'s Seal:

