



Illinois Environmental Protection Agency

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

JB Pritzker, Governor

James Jennings, Director

217-524-3301

CERTIFIED MAIL

RETURN RECEIPT REQUESTED

9589 0710 5270 3788 8800 38

JUN 29 2026

Eryn Barba
Orland Park Lake Ventures LLC
16650 South Canal Street
South Holland, Illinois 60473

Re: 0312310003 -- Cook County
Andrew Corporation
ILD005177084
Log No. B-219
RCRA Administrative Record – 24D
Permit Draft

Dear Eryn Barba:

Attached are a draft Resource Conservation and Recovery Act (RCRA) Remedial Action Plan Permit (draft RAPP) and fact sheet for Andrew Corporation. This draft RAPP decision is based on Illinois EPA's administrative record files. The contents of the administrative record are described in Title 35 Illinois Administrative Code (35 IAC) 703.303(c)(2).

In accordance with 35 IAC 703.303, the draft RAPP and administrative record must be publicly noticed and made available for review and comment. Illinois EPA must also provide an opportunity for a public hearing. Copies of the draft RAPP, fact sheet, and RAPP application are available for review by contacting Illinois EPA. A public hearing has not been scheduled, but any interested party may request a public hearing.

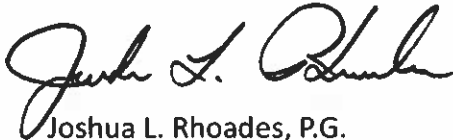
During the public comment period, the applicant or any interested party may submit comments to Illinois EPA on the draft RAPP. At the close of the comment period, Illinois EPA will prepare a response to significant comments. Comments on the draft RAPP may be submitted to:

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

The public comment period will close on August 21, 2026. Illinois EPA will issue a final RAPP after the close of the public comment period unless Illinois EPA decides to reverse this tentative decision. The appeal process and limitations are addressed in 35 IAC 705.212.

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

Sincerely,



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

Attachments: A – Fact Sheet
B – Draft RCRA RAPP

JLR:BF:0312310003-RCRA-B219-Draft.docx

BF CS TWH

cc: Dylan Haugh-Ewald – Environmental Protection Industries
Anthony Negri – Environmental Protection Industries

Fact Sheet
Draft RCRA Remedial Action Plan Permit
Andrew Corporation
10500 West 153rd Street
Orland Park, Illinois
Illinois EPA ID No. 0312310003
U.S. EPA ID No. ILD005177084
Log No. B-219

I. INTRODUCTION

This fact sheet has been prepared in accordance with the requirements of Title 35 Illinois Administrative Code (35 IAC) 703.303(b). This fact sheet is intended to be a summary of the principal facts and significant factual, legal, methodological, and policy questions considered in preparing a draft Resource Conservation and Recovery Act (RCRA) permit.

II. DESCRIPTION OF FACILITY

The facility is owned by:

Orland Park Lake Ventures LLC
16650 South Canal Street
South Holland, Illinois 60473

The 75-acre facility, located at 10500 West 153rd Street, Orland Park, in Cook County, Illinois, was formerly owned and operated by Andrew Corporation for the manufacture of telecommunications equipment such as antenna cables and cable connectors. Cables were made from copper or brass strips, and the cables and connectors were cleaned and finished with various chemicals such as acids, bases, and solvents. Some of these manufacturing activities resulted in soil contamination.

Andrew Corporation was a large-quantity generator of listed hazardous wastes (F001, F003, and F005) and characteristically hazardous wastes (D001, D002, D007, D008, D035, and D039) when it was in operation.

Andrew Corporation stopped operating in 2007, and the facility's buildings were demolished in 2013. Orland Park Lake Ventures LLC (OPLV) purchased the property in 2023. According to the permit application, the site will be developed for residential use when remediation is complete.

A map of the facility is provided as an attachment to this fact sheet.

III. HAZARDOUS WASTE MANAGEMENT ACTIVITIES

This draft RCRA Remedial Action Plan Permit (draft RAPP) authorizes OPLV to construct three staging piles (designated B, C, and D) for temporary storage of approximately 69,000 cubic yards of remediation waste while conducting remedial operations at the site. Other aspects of the remedial operations to be conducted at this site were reviewed and approved by Illinois EPA's Site Remediation Program (SRP).

A staging pile is defined in 35 IAC 724.654 as "an accumulation of solid, non-flowing remediation waste...that is not a containment building and which is used only during remedial operations for temporary storage at a facility." Remediation waste is defined in 35 IAC 720.110 as "all solid and hazardous wastes, and all media (including groundwater, surface water, soils, and sediments) and debris that are managed for implementing cleanup."

OPLV will be remediating soil contaminated with volatile organic compounds, metals, and polychlorinated biphenyls from three remediation areas around the site. Soil investigations from 2023 to 2024 demonstrated that the following contaminants of concern exceeded residential soil remediation objectives: acetone, aroclor-1254, arsenic, benzene, 2-butanone, chloroform, chromium, 1,1-dichloroethane, 1,2-dichloroethane, 1,1-dichloroethene, cis-1,2-dichloroethene, ethylbenzene, methylene chloride, naphthalene, tetrachloroethylene, toluene, 1,1,1-trichloroethane, 1,1,2-trichloroethane, trichloroethylene, vinyl chloride, and xylenes.

This Permit authorizes operation of each staging pile for a maximum of two years (with a one-time extension of up to 180 days with an approved permit modification request); however, remedial operations are expected to be completed within six months.

Designation	Dimensions (feet)
Staging Pile B	100 x 225
Staging Pile C	150 x 600
Staging Pile D	75 x 300

Each staging pile will be located over asphalt or concrete. Remediation waste in each staging pile will be lined by high-density polyethylene sheets and covered by the same or a similar waterproof material when not actively in use. The cover will be anchored by sandbags, inspected daily, and repaired immediately if issues are detected. A 12-inch-high containment berm will be in place around each staging pile to control stormwater run-on/run-off. Any water accumulated within the staging areas will be collected and sent off-site for disposal as hazardous waste. The maximum pile height is limited to 15 feet and multiple piles may be used within each staging pile area. Clean closure of all three staging piles is required when remedial operations are completed. A map of the remediation areas and the staging piles are attached to this fact sheet.

IV. SPECIAL CONDITIONS

Contaminated soil is not considered a hazardous waste unless it has been determined that the soil contains a listed waste. Under U.S. EPA's "contained-in" policy, soil which contains a listed waste must be managed as hazardous waste until it is demonstrated that the listed waste and any underlying hazardous constituents are no longer present at levels of regulatory concern. For this reason, several operating and special conditions were included in this Permit which require the Permittee to demonstrate that the treated soils have met the applicable treatment standards to return to the remediation areas or to be disposed as nonhazardous waste.

In addition, the Permit's compliance schedule requires the Permittee to revise the cost estimate for closure (and subsequently, to provide financial assurance for the amount of the estimate) and to obtain additional permits which may be required by Illinois EPA's Bureaus of Air and Water.

V. PROGRAMS AND PERMITS CONSIDERED OTHER THAN RCRA

Illinois EPA SRP

The site has been accepted into Illinois EPA Bureau of Land SRP. Documents titled, "Comprehensive Site Investigation Report (CSIR)," "Remedial Objectives Report (ROR)," "Remedial Action Plan (RAP)," and "CSIR/ROR/RAP Response Letter" were approved by SRP on June 23, 2025 (Log Nos. 24-78944 and 25-79854).

Illinois EPA Bureau of Air

In accordance with 35 IAC Parts 212 and 232, the facility is required to obtain a permit to regulate potential emissions to the atmosphere that may result from the remedial operations.

Illinois EPA Bureau of Water

A permit is not required from Bureau of Water for operation of the staging piles. A General National Pollution Discharge Elimination System Permit for Construction Site Activities is required for soil excavation activities if stormwater from the excavated area will discharge to surface water.

U.S. EPA

Self-Implementing Polychlorinated Biphenyls Cleanup was approved by U.S. EPA on December 10, 2025.

VI. PROCEDURES FOR REACHING A FINAL DECISION

In accordance with 703.303(d)(2), the public has 45 days to review the application and draft RAPP and to provide comments on the draft RAPP conditions prior to Illinois EPA taking any final permitting action on the application. The comment period will begin on July 7, 2026, the date of

the first publication of the public notice in a newspaper of general circulation in the area. The comment period will end on August 21, 2026.

The administrative record contains the RAPP application, draft RAPP, fact sheet, and other supporting documents and correspondence submitted to Illinois EPA. The administrative record is available for public inspection by appointment only at Illinois EPA's Springfield headquarters from 8:30 am to 5:00 pm, Monday through Friday. Any interested person may submit written comments on the draft RAPP, request a public hearing, or review the administrative record by contacting:

Illinois Environmental Protection Agency
Office of Community Relations – #5
Attn: Sarah Brubaker
2520 West Iles Avenue
Post Office Box 19276
Springfield, Illinois 62704-9276
217-786-0790

In response to requests received during the comment period or at the discretion of 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 in writing and must state the nature of the issues proposed to be raised in the hearing. Public notice will be issued 45 days before any public hearing.

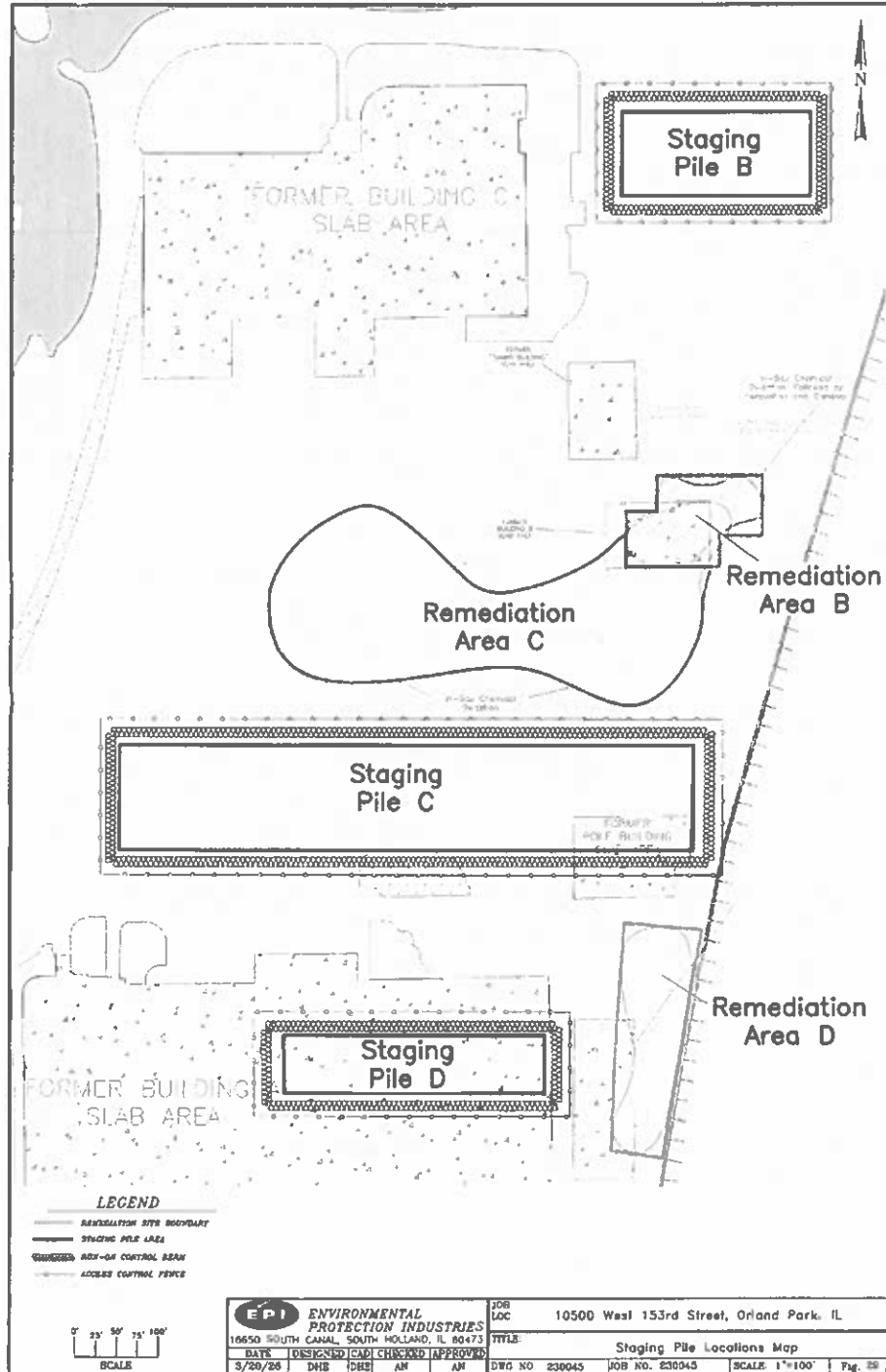
When Illinois EPA makes its final decision, notice will be given to the applicant and each person who has submitted written comments or requested notice of the final permit decision. The final RAPP will become effective 35 days after service of notice of the decision or later if stated in the Permit.

Attachments: A – Map of Facility
B – Map of Remediation Areas

ATTACHMENT A **Facility**



ATTACHMENT B
Remediation Areas





Illinois Environmental Protection Agency

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

JB Pritzker, Governor

James Jennings, Director

RCRA REMEDIAL ACTION PLAN PERMIT

0312310003 -- Cook County
Andrew Corporation
ILD005177084
Permit Log No. B-219
RCRA Administrative Record – 24D

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

PERMITTEE

Orland Park Lake Ventures LLC
Attn: Eryn Barba
16650 South Canal Street
South Holland, Illinois 60473

A Resource Conservation and Recovery Act (RCRA) Remedial Action Plan Permit (RAPP) is hereby granted to Orland Park Lake Ventures LLC as Owner, Operator, and the Permittee as authorized by Section 39(d) of the Illinois Environmental Protection Act (Act), and Title 35 Illinois Administrative Code (35 IAC) Subtitle G.

PERMITTED HAZARDOUS WASTE ACTIVITY

Storage: three staging piles for storage of remediation waste

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

This Permit is based on 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 approved 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:BF:0312310003-RCRA-B219-Draft.docx

RCRA Remedial Action Plan Permit

Andrew Corporation

Orland Park, Illinois

Illinois EPA No. 0312310003

U.S. EPA No. ILD005177084

**RCRA Remedial Action Plan Permit
Andrew Corporation**

TABLE OF CONTENTS

SECTIONS	PAGES
I. General Facility Description	I-1 to I-2
II. Staging Piles	II-1 to II-6
III. Special Conditions	III-1 to III-2
IV. Standard Conditions	IV-1 to IV-8
V. Reporting and Notification Requirements	V-1 to V-2
ATTACHMENTS	
A. Identification of the Approved Permit Application	A-1
B. Maps of Facility	B-1 to B-2
C. Certification of Closure	C-1

SECTION I: GENERAL FACILITY DESCRIPTION

A. OWNER

Orland Park Lake Ventures LLC is the Owner of this site.

Facility Contact

Eryn Barba

Controller/Business Manager

708-225-1115

B. LOCATION

1. The site is located at 10500 West 153rd Street, Orland Park, Illinois, 60473, in Cook County.
2. The general location of the site is shown in Attachment B. It is located at 41.61406° north latitude and 87.87497° west longitude. The site is approximately 75 acres and consists mostly of asphalt and concrete.

C. DESCRIPTION OF HAZARDOUS WASTE MANAGEMENT ACTIVITIES

The facility formerly manufactured cables and cable connectors for the telecommunications industry. During these operations, various cleaning and finishing chemicals, including acids, bases, and solvents, were used. Some of these activities resulted in soil contamination. The Permittee plans to address this soil contamination using an in-situ chemical treatment process with a sodium permanganate-based product.

The upper five feet of soil will be treated, excavated, and temporarily placed in designated staging piles so that deeper soil can be reached. This process will be repeated until contaminated soil has been addressed to a depth of approximately 20 feet in each remediation area.

Soil samples will be collected from the excavation areas and from the treated soil in the staging piles to verify that remediation objectives have been met. Soil from Staging Pile B will be transported to a permitted landfill for disposal. Soil from Staging Piles C and D will be returned to the excavated areas and compacted.

The remedial approach and objectives were approved by Illinois EPA's Site Remediation Program (SRP). This Permit authorizes the usage of staging piles to assist with the remedial operations. This Permit does not authorize groundwater investigation,

groundwater sampling, or groundwater remediation activities. Current groundwater-related activities are being managed through Illinois EPA's Site Remediation Program. If a release occurs during remediation activities conducted under this Permit, the facility may be subject to the requirements of 35 IAC 724, Subpart F.

SECTION II: STAGING PILES**A. UNIT IDENTIFICATION**

1. The Permittee may utilize the following hazardous waste management units subject to the terms and conditions of this Permit:

Designation	Dimensions (feet)	Approximate Volume of Remediation Waste Stored (cubic yards)	Hazardous Waste Constituents	Waste Codes
Staging Pile B	100 x 225	8,000	spent solvents; arsenic; chromium; PCBs	F001 F003 F005
Staging Pile C	150 x 600	50,000	spent solvents	F001 F003 F005
Staging Pile D	75 x 300	11,000		

2. Remediation areas and the locations of each unit are shown on Attachment B.
3. The units are limited to storage of remediation wastes from Remediation Areas B, C, and D shown in Attachment B. No other wastes are permitted to be stored in the units.

B. DESIGN AND OPERATING REQUIREMENTS

1. The Permittee must document the date remediation wastes are first placed into each unit in the operating record. In accordance with 35 IAC 724.654(h), a staging pile may be in operation for up to two years from the date remediation wastes are first placed into the pile.
2. According to 35 IAC 724.654(i)(1) and 35 IAC 703, Subpart G, the Permittee may request an extension of the operating term for any pile by submitting a Class 1* permit modification request to Illinois EPA in accordance with 35 IAC 703.281.
 - a. According to 35 IAC 724.654(i)(1), the operating term for a staging pile may be extended by up to 180 days and the Permittee may request an extension of the operating term only once.
 - b. The extension request must include sufficient information to demonstrate that continued operation will not pose a threat to human health or the environment, and that continued operation is necessary to complete the remedial operations.

3. High-density polyethylene sheets with thickness of at least 60 mil must be placed over asphalt or concrete to serve as a liner before remediation waste is placed in the units. In addition, the asphalt or concrete must be inspected in accordance with the requirements of Condition II.E.3.
4. Each unit must have a polyethylene cover that prevents rainfall infiltration, and the covers must be securely anchored with sandbags or silt socks to remain in place when exposed to wind. Covers may be removed only when soil is moved into or out of the units.
5. A perimeter containment berm with a height of at least 12 inches must be constructed around each unit to control run-on and run-off. Water that has come into contact with remediation waste or that is found within the containment area must be collected and disposed of as hazardous waste leachate.
6. If the approved liner, cover, or run-on/run-off containment system are found to be ineffective in preventing rainfall infiltration or leachate generation, the Permittee must propose alternative measures to Illinois EPA within 15 days of the Permittee or Illinois EPA identifying the liner, cover, or containment system as inadequate.
7. Vehicles and heavy equipment may enter the staging area from a designated entry point but may not drive over the liner.
8. The units must be fenced on all sides.
9. The maximum height of any waste pile within the units may not exceed 15 feet.
10. The Permittee must manage the remediation wastes in a manner consistent with the requirements of 35 IAC 724.117 and 35 IAC 724.654(e) to protect it from any condition which may cause it to ignite. The actions taken to ensure compliance with this condition must be documented in the operating record.
11. Contaminated soil may be manifested as a special waste and disposed of in a nonhazardous waste landfill, permitted under 35 IAC Part 813 and meeting the design requirements of 35 IAC Part 811, if the following conditions are met:
 - a. The contaminated soil does not exhibit any of the characteristics of hazardous waste as described in 35 IAC Part 721.
 - b. The contaminated soil meets the Land Disposal Restriction (LDR) treatment standards for any listed waste codes contained in the soil and

for any underlying hazardous constituents that may be present in accordance with 35 IAC Part 728.

12. Contaminated soil may be used to backfill the remediation areas from which it originated if the following conditions are met:
 - a. The contaminated soil does not exhibit any of the characteristics of hazardous waste as described in 35 IAC Part 721.
 - b. The contaminated soil meets the LDR treatment standards for any listed waste codes in the soil and for any underlying hazardous constituents that may be present in accordance with 35 IAC Part 728.
 - c. The contaminated soil is treated to below the lowest Tier 1 remediation objective listed under 35 IAC Part 742 for each contaminant of concern.
 - d. The contaminated soil did not exhibit the toxicity characteristic for inorganic constituents pursuant to 35 IAC Part 721 prior to treatment.
13. The Permittee must implement the dust suppression and air monitoring procedures described in the approved permit application. Upon issuance of a permit from Illinois EPA's Bureau of Air (BOA) containing requirements governing dust suppression and/or air monitoring, the Permittee must comply with the applicable BOA permit requirements.

C. WASTE IDENTIFICATION

1. The following contaminants of concern are present in the soil at concentrations exceeding the applicable remediation objectives:

1,1-Dichloroethene	1,1,1-Trichloroethane
Benzene	2-Butanone
1,1-Dichloroethane	1,2-Dichloroethane
Ethylbenzene	Toluene
1,1,2-Trichloroethane	Xylenes (total)
cis-1,2-Dichloroethene	Vinyl chloride
Trichloroethene	Acetone
Chloroform	Methylene chloride
Tetrachloroethene	Naphthalene
Arsenic	Chromium
Aroclor-1254	

D. RECORDKEEPING AND REPORTING

1. The Permittee must maintain an operating record in accordance with 35 IAC 724.173 until closure of the units. The operating record must include documentation of compliance with 35 IAC 724.101(j)(1) through 724.101(j)(10), the applicable portions of 35 IAC 724.173(b), and items such as all permits issued to the Permittee, all permit applications, all permit mods, all work plans, all inspection reports, and all analytical data. The operating record must be provided to Illinois EPA upon request in accordance with 35 IAC 724.174.
2. The Permittee must contact Illinois EPA's Des Plaines Regional Office via phone within 24 hours and by written correspondence within five days of identifying events which have led or may lead to the release of hazardous waste constituents to the environment. Releases occurring during remediation activities at the facility may be subject to the groundwater requirements under 35 IAC 724, Subpart F. The Regional Office can be reached at the following address and phone number:

Illinois Environmental Protection Agency
Des Plaines Regional Office
9511 Harrison Street
Des Plaines, Illinois 60016
847-294-4000

In addition to the Regional Office, the Permittee must report the release of hazardous waste constituents to the National Response Center by phone within 24 hours at 800-424-8802. Reports to the Regional Office and National Response Center should include the following information:

- a. the name and phone number of the caller;
- b. the name and address of the facility;
- c. the time and nature of incident;
- d. the name and quantity of materials involved;
- e. the extent of injuries; and
- f. possible hazards to human health or the environment outside of the facility.

E. INSPECTIONS

1. The Permittee must inspect the staging piles and all accessories to those units such as the air monitoring system, leachate containment system, cover, and liner at least once each operating day. Inspections are conducted to detect evidence of malfunctions, deteriorations, operator errors, and discharges that may be causing or may lead to the release of hazardous waste constituents in accordance with 35 IAC 724.101(j)(10).
2. In addition to the weekly schedule, inspections must be performed within 24 hours after any weather event with greater than 0.5 inches of rainfall.
3. Prior to construction of the units, a qualified, Illinois-licensed professional engineer must perform an integrity inspection of the underlying concrete or asphalt surface on which each unit will be located. The surface must be free of cracks, gaps, openings, settlement, and other deterioration that could allow infiltration or contaminant migration.
4. The results of all inspections and descriptions of any repairs, replacements, or corrective actions taken must be kept in the operating record.

F. CLOSURE

1. At closure, all remediation wastes, waste residues, and liquid within the stormwater containment area must be removed and properly disposed. Liners and covers must be decontaminated and disposed off-site. The concrete and asphalt bases on which each unit was constructed must be inspected by a qualified, Illinois-licensed professional engineer for evidence of releases from the units. If any releases are detected, the asphalt/concrete must be decontaminated and a sampling plan for the soils beneath the asphalt/concrete must be developed and submitted to Illinois EPA's Bureau of Land Permit Section for review and approval. In accordance with 35 IAC 724.654(k)(1), closure must be completed within 180 days after the operating term expires (specified in Condition II.B.1), and the closure procedures must be in accordance with 35 IAC 724.211, 724.358, and the conditions of this Permit.
2. Within 30 days of completion of closure activities, the Permittee must submit a closure certification form (included in Attachment C) and closure documentation report. The closure documentation report must include the following items:
 - a. a summary of the closure and decontamination procedures;

- b. copies of the waste manifests for any shipped wastes;
 - c. a description of the sampling and analysis performed and the analytical results;
 - d. the cost of the closure activities; and
 - e. color photographs of closure activities, including before, during, and after closure for each staging pile.
3. The Permittee must provide post-closure care in accordance with 35 IAC Part 724 for any unit that cannot be “clean” closed in accordance with the closure requirements of this Permit. If it is determined that post-closure care is required, the units will be considered landfills. Should post-closure become necessary, the Permittee must submit a written post-closure permit application to Illinois EPA within 60 days of the determination.

G. FINANCIAL ASSURANCE

1. The Permittee must maintain financial assurance meeting the requirements of 35 IAC 724, Subpart H at all times and in an amount at least equal to the approved cost estimate.

SECTION III: SPECIAL CONDITIONS

A. 39(i) CERTIFICATION

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

B. COMPLIANCE SCHEDULE

1. Within 30 days of the effective date of this Permit and prior to construction of the staging piles identified in Condition II.A.1, the Permittee must submit additional information which provides a detailed description of the procedures which will be used to demonstrate that the treated soil satisfies Conditions II.B.11 and II.B.12.
 - a. Once the Permittee has determined that the requirements of Conditions II.B.11 or II.B.12 have been met, the Permittee must provide to Illinois EPA notice of that determination and all supporting documentation. Soil may not be removed from the units until Illinois EPA has reviewed and approved the determination.
2. Within 30 days of the effective date of this Permit and prior to construction of the staging piles identified in Condition II.A.1, the Permittee must revise the cost estimate provided in the permit application. In accordance with 35 IAC 724.242(a)(1), the cost estimate must assume that closure occurs at the point and manner in which closure would be most expensive. Accordingly, the cost estimate must account for the maximum volume of remediation waste that could be present in the staging piles at the time of closure and must not assume that such waste may be returned to the remediation area. In addition, the cost estimate must include the costs associated with construction and maintenance of the staging piles identified in Condition II.A.1, the inspections required by this Permit, and all necessary characterization, transportation, treatment, storage, and/or disposal for any remediation waste that has not met all applicable permit conditions, land disposal restrictions, and remediation objectives.
 - a. Within 60 days of Illinois EPA's review and approval of the revised cost estimate and prior to construction of the staging piles identified in Condition II.A.1, the Permittee must submit financial assurance in

accordance with 35 IAC 724, Subpart H in at least the amount of the revised cost estimate.

3. For any permit modification other than an operating term extension, the Permittee should classify the modification according to the category in 35 IAC 703, Appendix A that most closely corresponds to the proposed change. If the permit modification only involves an extension of the operating term, the request must comply with Condition II.B.2.

C. PERMITTING

1. Prior to construction of the staging piles identified in Condition II.A.1, the Permittee must obtain a permit from Illinois EPA's Bureau of Air Permit Section to address any potential releases to the atmosphere.
2. Prior to construction of the staging piles identified in Condition II.A.1, the Permittee must contact Illinois EPA's Bureau of Water Permit Section to obtain any necessary permits for the excavation activities.
3. In the event of any conflict or inconsistency between the conditions of this Permit and information contained in the approved permit application or any supporting documents, the terms and conditions of this Permit will govern, unless otherwise determined by Illinois EPA.

**SECTION IV: STANDARD CONDITIONS
FOR REMEDIAL ACTION PLAN PERMITS (RAPPs)**

1. **EFFECT OF PERMIT.** The existence of a RAPP will not constitute a defense to a violation of the Environmental Protection Act or applicable regulations. Issuance of this permit does not convey property rights or any exclusive privilege. Issuance of this permit does not authorize any injury to property or invasion of other private rights, or infringement of state or local law or regulations. (35 IAC 702.181 and 35 IAC 702.147)
2. **PERMIT ACTIONS.** This Permit may be modified, reissued, or terminated for cause as specified in 35 IAC 703.270 through 703.273, 703.304, and 702.186. The filing of a request by the Permittee for a permit modification or termination, 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 and 35 IAC 703.304)
3. **DUTY TO COMPLY.** The Permittee must 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 Illinois Environmental Protection Act and is grounds for enforcement action, permit termination or modification, or denial of a permit renewal application. (35 IAC 702.141 and 35 IAC 703.242)
4. **PERMIT LIMITATIONS.** This RAPP is approved pursuant to 35 IAC Parts 703 and 724. The issuance of this RAPP does not constitute approval of any remediation plan or cleanup objective under 35 IAC Parts 740 or 742.
5. **NEED TO HALT OR REDUCE ACTIVITY NOT A DEFENSE.** It will not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity to maintain compliance with the conditions of this permit. (35 IAC 702.143)
6. **DUTY TO MITIGATE.** In the event of noncompliance with the Permit, the Permittee must take all reasonable steps to minimize releases to the environment and must carry out such measures as reasonable to prevent significant adverse impacts on human health or the environment. (35 IAC 702.144)
7. **PROPER OPERATION AND MAINTENANCE.** The Permittee must 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)

8. **DUTY TO PROVIDE INFORMATION.** The Permittee must furnish to Illinois EPA, within a reasonable time, any relevant information which 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 must also furnish to the Illinois EPA, upon request, copies of records required to be kept by this Permit. (35 IAC 702.148)
9. **INSPECTION AND ENTRY.** The Permittee must allow an authorized representative of 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 a copy, at reasonable times, of any records that must be kept under the conditions of this Permit;
 - c. Inspect, at reasonable times, any facilities, equipment, practices, or operations regulated or required by this Permit;
 - 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 703.149)
10. **MONITORING AND RECORDS.** The Permittee must comply with the following requirements for monitoring and maintaining records:
 - a. Samples and measurements taken for the purpose of monitoring must be representative of the monitored activity. The method used to obtain a representative sample of the waste must be the appropriate method from Appendix A of 35 IAC Part 721. 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 must 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 years from the date of the sample, measurement, report or application. These periods may be extended by Illinois EPA at any time. The Permittee must 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 must 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)
- 11. **REPORTING PLANNED CHANGES.** The Permittee must give written notice to 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 Illinois EPA as permit modification request that complies with the requirements of 35 IAC 703.304. (35 IAC 702.152(a))
- 12. **CONSTRUCTION CERTIFICATION.** For a new hazardous waste management facility, the Permittee may not commence treatment, storage, or disposal of hazardous waste; and for a facility being modified the permittee may not treat, store, or dispose of hazardous waste in the modified portion of the facility, until:
 - a. The Permittee has submitted to Illinois EPA by certified mail or hand delivery a letter signed by the Permittee and a registered professional engineer stating that the facility has been constructed or modified in compliance with the Permit; and
 - b. Illinois EPA has inspected the modified or newly constructed facility and finds it complies with the condition of the Permit; or

- c. If, within 15 days of the date of submission of the letter in paragraph (a), the Permittee has not received notice from 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).
- 13. **ANTICIPATED NONCOMPLIANCE.** The Permittee must give advanced written notice to 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))
- 14. **TRANSFER OF PERMITS.** This Permit is not transferable to any person or corporation unless the transfer is approved in writing by Illinois EPA. All permit transfers must be conducted in accordance with 35 IAC 703.305(c). (35 IAC 702.152(c))
- 15. **MONITORING REPORTS.** Monitoring results must be reported at the intervals specified in the Permit. (35 IAC 702.152(d))
- 16. **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 must be submitted no later than specified in 35 IAC 702.162. (35 IAC 702.152(e))
- 17. **TWENTY-FOUR HOUR REPORTING.** The Permittee must comply with the following requirements for 24-hour reporting:
 - a. The Permittee must report to Illinois EPA and to U.S. EPA's National Response Center any noncompliance with the Permit which may endanger health or the environment. Any such information must be reported orally within 24 hours from the time the Permittee becomes aware of the following circumstances:
 - 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 must include:
 - i. the name, address, and phone number of the owner or operator;
 - ii. the name, address, and phone number of the facility;

- iii. the date, time, and type of incident;
 - iv. the 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. the estimated quantity and disposition of recovered material that resulted from the incident.
- c. A written submission must also be provided within five days of the time the Permittee becomes aware of the circumstances. The written submission must 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. Illinois EPA may waive the five-day written notice requirement in favor of a written report within 15 days. (35 IAC 702.152(f) and 35 IAC 703.245(b))
18. **OTHER NONCOMPLIANCE.** The Permittee must report all instances of noncompliance not otherwise required to be reported under Standard Conditions 15, 16, and 17, at the time monitoring reports, as required by this Permit, are submitted. The reports must contain the information listed in Standard Condition 17. (35 IAC 702.152(g))
19. **OTHER INFORMATION.** If the Permittee becomes aware that they failed to submit relevant facts in the permit application or submitted incorrect information in a permit application or in any report to Illinois EPA, the Permittee must promptly submit such facts or information to Illinois EPA. (35 IAC 702.152(h))
20. **REPORTING REQUIREMENTS.** The following reports required by 35 IAC Part 724 must be submitted in addition to those required by 35 IAC 702.152 (reporting requirements):
- a. **Manifest discrepancy report:** if a significant discrepancy in a manifest is discovered, the Permittee must attempt to reconcile the discrepancy with the waste generator or transporter. If the discrepancy is not resolved within 15 days after receiving the waste, the Permittee must immediately submit to Illinois EPA a letter describing the discrepancy and attempts to reconcile it and a copy of the manifest or shipping paper at issue. (35 IAC 724.172(b))

- b. Unmanifested waste report: The Permittee must submit to Illinois EPA within 15 days of receipt of unmanifested waste an unmanifested waste report on EPA form 8700-13B. (35 IAC 724.176)
- c. Annual report: an annual report must be submitted covering facility activities during the previous calendar year. (35 IAC 724.175)

21. SUBMITTAL OF REPORTS OR OTHER INFORMATION. All written reports or other written information required to be submitted by the terms of this Permit should be sent to:

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

22. PERMIT APPEAL. This RAPP may be appealed in accordance with the provisions contained in 35 IAC 703.303(f) or 35 IAC 703.304(e).

23. PERMIT MODIFICATION. If the Permittee wishes to modify this RAPP, the Permittee must send an application for permit modification to:

Illinois Environmental Protection Agency
Bureau of Land Permit Section – #33
2520 West Iles Avenue
P.O. Box 19276
Springfield, Illinois 62794-9276

The Permittee must submit the RCRA RAPP Application form and a detailed description of the requested modification. If Illinois EPA believes the requested change(s) would significantly change the management of remediation waste, Illinois EPA will comply with the requirements of 35 IAC 703.303(a)–703.303(e). The certification of closure, if approved, will not be considered a significant change requiring public notice in accordance with 35 IAC 703.303(d).

24. PERMIT RENEWAL. If the Permittee wishes to renew this Permit, the Permittee must follow the process for application and issuance of RAPPs found in 35 IAC 703, Subpart H. 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 30 days before this Permit expires, unless permission for a later date has been granted by Illinois EPA. This Permit and all conditions herein will remain in effect beyond this Permit's expiration

date if the Permittee has submitted a renewal application at least 30 days before this Permit expires, and through no fault of the Permittee, Illinois EPA has not issued a new permit. (35 IAC 703.303(a), 35 IAC 703.304(g), and 35 IAC 703.304(h))

25. **TERMINATION OF PERMIT.** If Illinois EPA determines the RAPP should be terminated, Illinois EPA must comply with the procedures under 35 IAC 703.303(a)–703.303(e). If the Permittee wishes to terminate the RAPP, the Permittee must submit a permit modification.
26. **CONFIDENTIALITY.** Any claim of confidentiality must be asserted in accordance with 35 IAC 703.302(e) and 35 IAC 703.120.
27. **SIGNATORY REQUIREMENT.** All permit application, reports, or information submitted to the Illinois EPA regarding the RAPP must be signed and certified in accordance with 35 IAC 702.126. (35 IAC 703.151)
28. **SECURITY REQUIREMENTS.** The Permittee must comply with the security provisions of 35 IAC 724.101(j)(3), and the emergency coordinator requirements of 35 IAC 724.101(j)(11).
29. **INSPECTION REQUIREMENTS.** The Permittee must inspect the remediation waste management site for malfunctions, deterioration, operator error, and discharges that may be causing or may lead to a release of hazardous waste constituents to the environment or may be a threat to human health. Inspections must be conducted often enough (at least once each operating day) to identify problems in time to correct them before they harm human health or the environment. If a hazard has already occurred, the Permittee must immediately take remedial action to minimize impacts on human health and the environment. Within 30 days of any releases, the Permittee must submit to Illinois EPA a description of the release and a description of any corrective measures taken. (35 IAC 724.101(j)(4))
30. **LAND DISPOSAL RESTRICTIONS.** If waste is taken off-site for treatment or disposal, the Permittee must comply with the land disposal restriction contained in 35 IAC Part 728.
31. **MANIFESTS.** If hazardous waste is shipped off-site, the Permittee must comply with the manifest, pre-transport, and reporting and record keeping requirements of 35 IAC 722, Subparts B, C, and D. If non-hazardous special waste is shipped off-site, the Permittee must comply with the manifest requirements of 35 IAC 808.121 and 35 IAC 808.122. In either case, a transporter licensed in accordance with 35 IAC Part 809 must be used when transporting hazardous or non-hazardous special waste.

32. **APPLICATION DATA.** The Permittee must maintain all data used to complete the RAPP application, and any supplemental information the Permittee submits to Illinois EPA, for a period of at least three years from the date the original RAPP application is signed. This information must be made available to representatives of Illinois EPA upon request. (35 IAC 703.305(a))
33. **RECORDKEEPING.** The Permittee must maintain records documenting compliance with 35 IAC 724.101(j)(1) through 724.101(j)(12) at the facility. (35 IAC 724.101(j)(13))
34. **CLOSURE REQUIREMENTS FOR ACCUMULATION AREAS.** The Permittee must close container 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).
35. **FINANCIAL ASSURANCE.** The Permittee must demonstrate compliance with 35 IAC Part 724, Subpart H by providing documentation of financial assurance, as required by 35 IAC 724.251, in at least the amount of the approved closure cost estimate and the applicable liability requirements. Changes in financial assurance mechanisms must be approved by Illinois EPA in accordance with 35 IAC 724.243. The Permittee must comply with 35 IAC 724.248 whenever necessary.

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

Illinois Environmental Protection Agency
Materials Management and Compliance Section
Bureau of Land – #24
2520 West Iles Avenue
Post Office Box 19276
Springfield, Illinois 62794-9276

SECTION V: REPORTING AND NOTIFICATION REQUIREMENTS

The reporting and notification requirements of each section of the RCRA Permit are summarized below. It is provided for the convenience of the Permittee, but it is not meant to supersede the requirements of the various sections of this Permit.

SECTION II: STAGING PILES

Condition	Action	When
D.1	Maintain operating record and furnish it to Illinois EPA	Upon request
D.2	Contact Des Plaines Regional Office and National Response Center	Within 24 hours of identifying issues which may lead to the release of hazardous waste to the environment.
E.1	Inspect staging piles and all associated equipment	At least once each operating day
E.2	Inspect staging piles and all associated equipment	Within 24 hours of weather events with at least 0.5 inches precipitation
E.3	Inspect concrete and asphalt beneath each staging pile	Prior to construction of staging piles
F.1	Submit subsoil investigation workplan	At closure, if a release of hazardous waste is identified
F.2	Submit a closure certification form and closure documentation report	Within 30 days of completion of closure
F.3	Submit post-closure care plan	Within 30 days of closure, if any staging pile could not be clean closed

SECTION III: SPECIAL CONDITIONS

Condition	Action	When
A.1	Submit LPC-PA23	With all submittals to Illinois EPA

A.2	Submit 39(i)	If authorized signatory changes and with all permit applications
B.1	Submit plan to demonstrate LDR treatment standards and remediation objectives are achieved	Within 30 days of the effective date of this Permit
B.1(a)	Submit documentation that LDR treatment standards and remediation objectives were achieved	Prior to removing soil from staging piles
B.2	Submit revised cost estimate	Within 30 days of the effective date of this Permit and prior to construction of staging piles
B.2(a)	Submit financial assurance	Within 30 days of Illinois EPA's approval of the revised cost estimate and prior to construction of staging piles
C.1	Obtain BOA permit	Prior to construction of staging piles
C.2	Obtain BOW permit, if necessary	Prior to construction of staging piles

SECTION IV: STANDARD CONDITIONS

Condition	Action	When
8	Provide information	Upon request
11	Report changes to operation	At least 7 days prior to implementation
13/17	Notify Illinois EPA Field Operations Section (847-294-4000) and National Response Center (800-424-8802)	By phone: within 24 hours In writing: within 5 days
19	Provide corrections to information	Within 24 hours of detection of inaccurate or incorrect information in the application

ATTACHMENT A

IDENTIFICATION OF THE APPROVED PERMIT APPLICATION

ILLINOIS EPA No. 0312310003

U.S. EPA No. ILD005177084

REMEDIAL ACTION PLAN PERMIT NO. B-219

ATTACHMENT A
IDENTIFICATION OF THE APPROVED PERMIT APPLICATION

This Permit is based on the information in the approved permit application. The approved permit application consists of the following documents:

Document	Dated	Received
RAPP Application	March 20, 2026	March 24, 2026
--Contingency Plan	April 14, 2026	April 17, 2026
--Cost Estimate	April 17, 2026	April 22, 2026

ATTACHMENT B

MAPS

ILLINOIS EPA No. 0312310003

U.S. EPA No. ILD005177084

REMEDIAL ACTION PLAN PERMIT NO. B-219

Remediation Site Boundary

GRASS

LAKE ANDREW

PARKING

FORMER BUILDING C SLAB AREA

FORMER BUILDING B SLAB AREA

FORMER BUILDING E SLAB AREA

FORMER BUILDING D SLAB AREA

FORMER BUILDING A SLAB AREA

Remediation Site Boundary

GRASS

PARKING

LEGEND

— REMEDIATION SITE BOUNDARY

0 100 FEET

SCALE

ENVIRONMENTAL PROTECTION INDUSTRIES

16650 SOUTH CANAL, SOUTH HOLLAND, IL 60473

DATE: 3/29/96

BY: [Signature]

CHK: [Signature]

APP: [Signature]

JOB LOC: 10500 West 153rd Street, Orland Park, IL

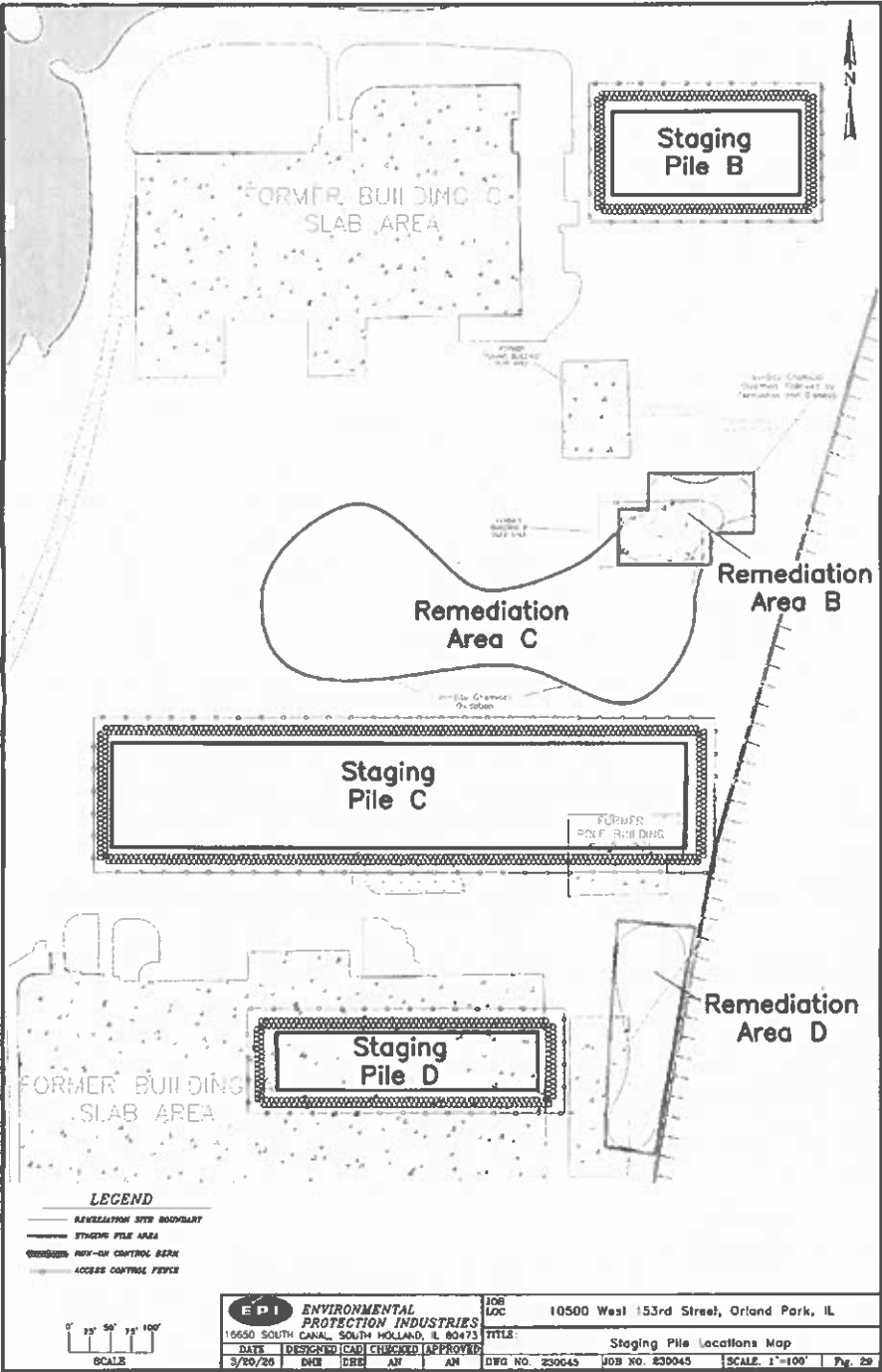
TITLE: Current Site Layout Map

JOB NO: 230045

SCALE: 1"=200'

PL: 1

Remediation Areas



ATTACHMENT C

CERTIFICATION OF CLOSURE

ILLINOIS EPA No. 0312310003

U.S. EPA No. ILD005177084

REMEDIAL ACTION PLAN PERMIT NO. B-219



Illinois Environmental Protection Agency

CERTIFICATION OF COMPLETION OF RCRA CLOSURE

ANDREW CORPORATION (0312310003) – COOK COUNTY

USEPA ID: ILD005177084

RCRA Closure Log No. B-219

To meet the requirements of 35 Ill. Adm. Code 724.215, this statement is to be completed by both a responsible officer of the owner/operator (as defined in 35 Ill. Adm. Code 702.126) and by a qualified Illinois licensed professional engineer upon completion of closure of the staging piles. Submit one copy of the certification with original signatures and two additional copies.

The hazardous waste management units, known as Staging Piles B, C, and D, at Andrew Corporation have been closed in accordance with the specifications in the approved closure plan. A report documenting that closure has been carried out in accordance with the approved closure plan is attached.

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))

Facility Name

Printed Name of Responsible Officer

**Signature of Owner/Operator
Responsible Officer**

Date

Printed Title of Responsible Officer

Signature of Licensed P.E.

Date

**Printed Name of Licensed P.E. and Illinois
License Number**

Mailing Address of P.E.:

Licensed P.E.'s Seal:

