



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

866/273-5488 TTY

May 29, 2025

Certified Mail # 9589 0710 5270 0389 6967 61

Return Receipt Requested

A-F Acquisition, LLC dba Pullman Innovattions
Pete Rnich, Facility Manager
2701 E. 100th St.
Chicago, IL 60617

RE: Violation Notice A-2025-00041
I.D. 031600FDK

Dear Mr. Rnich

This constitutes a Violation Notice pursuant to Section 31(a)(1) of the Illinois Environmental Protection Act ("Act"), 415 ILCS 5/31(a)(1), and is based upon a review of available information and an investigation by representatives of the Illinois Environmental Protection Agency ("Illinois EPA").

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

A written response, which may include a request for a meeting with representatives of the Illinois EPA, must be submitted via certified mail to the Illinois EPA within 45 days of receipt of this letter. If a meeting is requested, it shall be held within 60 days of receipt of this notice. The response must include information in rebuttal, explanation, or justification of each alleged violation and a statement indicating whether or not the source wishes to enter into a Compliance Commitment Agreement ("CCA") pursuant to Section 31(a) of the Act. If the source wishes to enter into a CCA, the written response must also include proposed terms for the CCA that contains dates for achieving each commitment and may also include a statement that compliance has been achieved for some or all of the alleged violations. In order to increase the likelihood of the Illinois EPA accepting such terms, the written response should specifically propose them in a manner that can be formalized into an enforceable agreement between the Illinois EPA and the source. As such, proposed conditions should be as detailed as possible, including steps to be taken to achieve compliance, the manner of compliance, interim and completion dates, etc.

IEPA

Division of Records Management
Releasable

Reviewer: KKN

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

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

Written communications should be directed to Alberto Alcantar, Illinois EPA, Bureau of Air, Compliance Section, P.O. Box 19276, Springfield, Illinois 62794-9276. All communications must include reference to the Violation Notice number in this matter.

Questions regarding this matter should be directed to Alberto Alcantar at 217-524-7637 or via email at alberto.alcantar@Illinois.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Yas Keppner-Bauman". The signature is fluid and cursive, with the first name "Yas" being the most prominent.

Yasmine Keppner-Bauman, Acting Manager
Compliance Section
Bureau of Air

YKB:AA

ATTACHMENT A

Based on available information:

VIOLATIONS:

1. Section 9(a) of the Act and 35 Ill. Adm. Code 201.141: A-F Acquisition, LLC dba Pullman Innovations (Pullman Innovations) caused or allowed the discharge of odorous emissions so as to cause or tend to cause air pollution.
2. Section 9(b) of the Act and Condition 5 of Lifetime Operating Permit (LOP) 86050044: Pullman Innovations failed to take appropriate and necessary actions to minimize odors, including but not limited to, changes in material or installation of controls, in order to eliminate the odor nuisance.
3. Section 9(b) of the Act and Condition 7(a) of LOP 86050044: Pullman Innovations failed to perform inspections and maintenance on the Caustic Scrubber such that it be kept in proper working condition and not cause a violation of the Environmental Protection Act or regulations promulgated therein.
4. Section 9(b) of the Act and Condition 7(b) of LOP 86050044: Pullman Innovations may have failed to operate the Caustic Scrubber at all times when the associated emissions units were in operation and emitting air contaminants.
5. Section 9(a) and 9(b) of the Act, 35 Ill. Adm. Code 218.301, and Condition 8 of LOP 86050044: Pullman Innovations may have cause or allowed the discharge of more than 8 lbs/hr of volatile organic material (VOM) into the atmosphere from its soapstock acidulation process.
6. Section 9(b) of the Act and 35 Ill Adm. Code 201.142: Pullman Innovations failed to timely obtain a construction permit prior to the construction of a 41.85 mm-BTU boiler associated with its soapstock acidulation process.
7. Section 9(b) of the Act and Condition 11 of LOP 86050044: Pullman Innovations failed to submit a report to the Illinois EPA, Bureau of Air, Compliance Section, within 30 days of deviations from LOP 86050044.

ATTACHMENT A (continued)

RECOMMENDATIONS:

The Illinois EPA suggests that Pullman Innovations take the following actions to address the violations stated above:

1. Immediately cease causing or allowing discharge of odor from the facility. Additionally, within 45 days of receipt of this Violation Notice, develop, implement, and submit to the Illinois EPA, Bureau of Air, Compliance Section, a compliance plan that ensures that the facility will cease causing or allowing the discharge of odorous emissions so as to cause or tend to cause air pollution by utilizing appropriate and necessary actions to minimize odors. This compliance plan shall include all interim and/or permanent measures and procedures that have been undertaken, or will be undertaken, milestones, and dates by which those milestones will be achieved.
2. Within 45 days of receipt of this Violation Notice, submit to the Illinois EPA, Bureau of Air, Compliance Section, standard operating procedures, routine maintenance records, repair records, and any performance evaluations conducted on the scrubbers from April 1, 2022, through the present.
3. Within 45 days of receipt of this Violation Notice, submit to the Illinois EPA, Bureau of Air, Compliance Section, equipment parameter monitoring records for the scrubbers which include the gallons per minute (gpm) and the pH values for each scrubber from April 1, 2022, through the present.
4. Within 45 days of receipt of this Violation Notice, submit to the Illinois EPA, Bureau of Air, Compliance Section, records of VOM emissions (lbs/hr, tons/month, and tons/year) from the Caustic Scrubber, with supporting documentation and calculations, from May 20, 2022, through May 20, 2025.
5. Within 45 days of receipt of this Violation Notice, develop, implement, and submit to the Illinois EPA, Bureau of Air, Compliance Section, a compliance plan which ensures that maintenance and inspections are performed on the scrubbers such that they be kept in proper working condition and not cause a violation of the Environmental Protection Act or regulations promulgated therein. This compliance plan shall include all interim and/or permanent measures and procedures that have been undertaken, or will be undertaken, milestones, and dates by which those milestones will be achieved.
6. Within 45 days of receipt of this Violation Notice, develop, implement, and submit to the Illinois EPA, Bureau of Air, Compliance Section, a compliance plan which ensures future deviation reports will be timely submitted. This compliance plan shall include all interim and/or permanent measures and procedures that have been undertaken, or will be undertaken, milestones, and dates by which those milestones will be achieved.

ATTACHMENT A (continued)

RECOMMENDATIONS (continued):

7. Within 45 days of receipt of this Violation Notice, develop, implement, and submit to the Illinois EPA, Bureau of Air, Compliance Section, a compliance plan which ensures future construction permit applications are timely submitted. This compliance plan shall include all interim and/or permanent measures and procedures that have been undertaken, or will be undertaken, milestones, and dates by which those milestones will be achieved.
8. Within 45 days of receipt of this Violation Notice, submit to the Illinois EPA, Bureau of Air, Compliance Section, a complete and accurate operating permit application that includes all applicable emissions units and appropriately reflects the current operations at the source.
9. Within 90 days of receipt of this Violation Notice, conduct applicable testing for odorous compounds and VOM at the inlet and outlet of both Caustic and Acid Scrubbers to demonstrate compliance with the requirements in Lifetime Operating Permit 86050044. The test notification, protocol, and report shall be submitted in accordance with the information below.

Within 30 days from the date of this letter, Burgess Norton Manufacturing Co. shall provide a proposed emissions test protocol and test date to the Illinois EPA. Final written confirmation of the exact date and time of the test shall be made five days prior to the actual test date in order to enable Illinois EPA representatives to witness the test.

Written confirmation to the Illinois EPA shall include at a minimum:

- a. The name and identification of the emission unit(s) being tested.
- b. Purpose of the test, i.e., permit condition requirement, IEPA or USEPA requesting test.
- c. The person(s) who will be performing sampling and analysis and their experience with similar tests.
- d. The specific conditions under which testing will be performed, including a discussion of why these conditions will be representative of maximum emissions and the means by which the operating parameters for the emission unit and any control equipment will be determined.
- e. The specific determinations of emissions and operation which are intended to be made, including sampling and monitoring locations.

ATTACHMENT A (continued)

RECOMMENDATIONS (continued):

- f. The test method(s) that will be used, with the specific analysis method, if the method can be used with different analysis methods. Include if emission tests averaging of 35 IAC 283 will be used.
- g. Any minor changes in standard methodology proposed to accommodate the specific circumstances of testing, with detailed justification. This shall be included as a waiver of the test procedures. If a waiver has already been obtained by the IEPA or USEPA, then the waiver shall be submitted.
- h. Any proposed use of an alternative test method, with detailed justification. This shall be included as a waiver of the test procedures. If a waiver has already been obtained by the IEPA or USEPA, then the waiver shall be submitted.
- i. Sampling of materials, QA/QC procedures, inspections, etc.

Test results shall be submitted within 30 days of the test date. The final report shall include at a minimum:

- a. A descriptive and table summary of results.
- b. General information, including but not limited to the name, location, and identification of the emission source(s) tested, date(s) of testing, names of personnel and entities performing the tests, and Illinois EPA observers, if any.
- c. Description of test procedures and method(s), including description and map of emission sources and sampling points, sampling train, testing and analysis equipment, and test schedule.
- d. Detailed description of test conditions, including:
 - i. List and description of the equipment (including serial numbers or other equipment specific identifiers) tested and process information, i.e., mode(s) of operation e.g. type and amount of fuel consumed, process rate/throughput;
 - ii. Control equipment information, i.e., equipment condition and operating parameters during testing; and
 - iii. A discussion of any preparatory actions taken, i.e., inspections, calibration, maintenance, and repair.

ATTACHMENT A (continued)

RECOMMENDATIONS (continued):

- e. Data and calculations, including copies of all raw data sheets and records of laboratory analyses, sample calculations, and data on equipment calibration. Identification of the applicable regulatory standards/permit conditions that the testing was performed to demonstrate compliance with, a comparison of the test results to the applicable regulatory standards/permit conditions and a statement whether the test(s) demonstrated compliance with the applicable standards/permit conditions.
- f. An explanation of any discrepancies among individual tests, failed tests, or anomalous data.
- g. The results and discussion of all quality control evaluation data, including a copy of all quality control data.
- h. The applicable operating parameters of the pollution control device(s) during testing (temperature, time of operation, etc.).

Test protocol, notifications and final reports should be submitted to:

Illinois EPA/Bureau of Air
Compliance Section
2520 West Iles Ave
P.O. Box 19276
Springfield, IL 62794-9276
(1 copy)

Illinois Environmental Protection Agency
Bureau of Air
Source Monitoring Unit
EPA.BOA.SMU@illinois.gov
(1 electronic copy)