



Illinois Environmental Protection Agency

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JB Pritzker, Governor

James Jennings, Acting Director

MEMORANDUM

DATE: April 3, 2026,

CC: FOS-01

TO: Region File

FROM: Ricardo Ng, DWPC/FOS

IEPA

Division of Records Management
Releasable

SUBJECT: Pullman Innovations, 2701 East 100th Street, Chicago, IL 60617
BOW ID W0316000933

Reviewer: KKN

Introduction

On April 3, 2026, a reconnaissance inspection was conducted at Pullman Innovations located at 2701 East 100th Street, Chicago, IL 60617. The reconnaissance inspection was conducted to document status of pretreatment wastewater treatment from this facility, due to concerns with possible modifications or construction of pretreatment facilities without a Water Pollution Control permit.

Responsible/Contact Party

Pullman Innovation owner information is A-F Acquisition, LLC, dba Pullman Innovations, the facility Manager is Peter Rnich (773)-978-5130 prnich@pullmaninnovations.com. The consultant is Christopher Cailes P.E. (847) 996-3580, cailes@daienv.com from DAI Environmental

Facility Description

Pullman Innovation operates a vegetable oil byproduct processing and distribution facility, composed of approximately 6.87 acre of property (See attached aerial map). Pullman Innovation has SIC code reported as 2079 or NAICS 31125, is located in combined sewer area, with pretreatment overseen by MWRDGC Calumet WRP NPDES permit IL0028061, industrial waste division User ID 27723.

The facility is engaged in soapstock acidulation, which is a process that converts byproduct commercial edible oil into commercial animal (poultry and cattle) feed ingredients by oil/water



gravity separation. Various types of soapstock vegetable oil are processed: soybean, canola and vegetable. The final product is distributed by tanker truck and rail car to offsite animal feed facilities the wastewater generated is pretreated onsite and discharge to MWRDCG.

BOA Background information

BOA permit application (Appendix A), received by Illinois EPA on 3/07/2025 describes the facility soapstock acidulation and wastewater generation process as follows: consists of pre-acidulation, raw product soapstock is liquid emulsion of soap received via railcar and tanker truck, vegetable oil and water received from the vegetable oil manufactures, with no solvent mixed into the soapstock. The raw soapstock is transferred via pump and hose/piping into three above ground storage tanks (Tanks T41, T42, and T43), these tanks decant via gravity separation, from these tanks T41, T42, and T43, decanted soapstock is transferred to T31, T32, T33, and T34 for further gravity separation or advance acidulation process. All water that separates from soapstock delivery/transfer or within decanted tanks (7 tanks: T31, T32, T33, T34, T41, T42, and T43) is transferred to six (6) wastewater holding tanks (T24, T25, T26, T27, T45, and T46).

Soapstock and wastewater tanks are affixed with duckworks, capturing odors to acid scrubber and atmosphere via single stack. Most of the transfer between tanks appears to happen with overhead pipe or hose connection.

BOA permit application (Appendix A) contains additional information about process units Reactors and storage tanks, post acidulation finished products storage and transfer. Post-acidulation wastewater is transferred to tanks W1, W2, W3, and W4. Pre-acidulation and post-acidulation are blended into Tank 00, there is onsite treatment consisting of 2 skimmers (oil/water separator), caustic soda neutralization and discharged to MWRDGC combined sewer system

There is additional BOA documentation provided by Pullman Innovation Odor study (Appendix B) sampling report dated 12/5/2016, that mentions installation of Dissolve Air Floatation (DAF) unit related to wastewater, it appears it was removed in later years 2018. Also, wastewater tanks W5 and W6 appear installed 2015-2016

Additional wastewater tanks T45, T46 and sludge Tank T47 appear installed with cooling tower evaporation system in 2024 aerial photo.

The diagram notes unit T134 is a clean water tank after condensation from the Evaporation Unit Wastewater Treatment, according to general information this unit is used to reduce water portion of water-based waste with an evaporator that converts the water portion of water-based waste to water vapor, while leaving the oil residue and stored in sludge tank 147 to be recycle back into the plant process for product recovery. These wastewater evaporation solutions minimize the amount of waste that needs to be hauled off-site or discharged to MWRDGC.

April 3, 2026 Inspection Notes

On April 2024 I visited the plant and met with Chris Cailles P.E Environmental Consultant and Alonso Alvarez Production Manager, Pullman Innovation. The following was observed/discussed:

- The facility is currently allowed to discharge pretreatment wastewater to MWRDGC under an expired permit; however they are working on an extension in preliminary administration, it is expected to be granted for 1 year instead of typical 5 year.
- The facility is currently operating at a reduced soapstock production currently 95k tons to allow for optimization of the pretreatment wastewater treatment plant and able to meet phosphorus requirements by MWRDGC pretreatment requirements.
- The pretreatment plant appears to be modified. The need to obtain WPC permit for the pretreatment plant wastewater treatment was emphasized as already communicated by Francisco Herrera, Industrial Unit Permit Section.
- It was clarified that the prior facility owner, Agri-fine, closed on 12/12/2015 and Pullman Innovation started operation on 4/1/2016. There was a pilot dissolved air floatation (DAF) installed during Agri-fine's operation of the facility and removed approximately 6 months after Pullman Innovation took over.
- Wastewater tanks W6 and W5 were added in approximately 2016.
- Wastewater tanks T45 and T46 were added at the end of 2024.
- Sludge tank 147 was also added at the end of 2024. This tank was used to collect oil product residue from the evaporation system. The sludge was hauled away at that time. Sludge Tank 147 is currently not in use, or if used the stored material is recycled back into acidulation process in the plant.
- The evaporation system was added as 4 units in series, installed at the end of 2024. Two units started operating in January 2025. The other two units started operating in January 2026.
- At the end of 2024 the facility moved existing tanks T131, T132, T133. This appears not related to wastewater. Existing tank 134 was also moved or relocated next to evaporator units. Tank 134 is used to collect clean water from evaporator unit system.
- Pullman Innovations has two existing certified class K operators. However, their operator certification needs to be updated since wastewater plant system was modified and changed.

- April 3, 2026 Odor Observations:
 - Upon arriving at the gated facility entrance, I remained inside the vehicle and did not notice any odors. I spent a couple of minutes trying to call the facility operator's phone number to open the gates so that I could park inside.
 - Upon parking at the facility parking lot right next to their office/visitor check in building, I noticed slight smell. It is a unique smell of agriculture animal feed/oil, it does not smell like chemical or sewage/H₂S.
 - I checked inside the office building and conducted discussion there was no odor noted inside the office building.
 - After discussion I proceeded to conduct a walking inspection of wastewater units. The slight smell was present outside, but it was much stronger inside the canvas building where the evaporators units are and also inside the building where the skimmer 1 and skimmer 2 are located.

MWRDGC notes

According to MWRDGC the facility is still discharging in conformance with the terms and conditions of the previously issued discharge Authorization 27723-5.2. The Discharge Authorization renewal was denied 11/6/2025. Pullman Innovation follow request review conference with the Director of Monitoring and Research. They may keep discharging wastewater under the existing authorization's terms and the ordinance while the denial is under review but must stop discharging immediately if the MWRDGC Board of Commissioners issues a final administrative decision upholding the denial.

According to MWRDGC Industrial Waste Division Pullman Innovation wastewater pretreatment Average flow GPD was:

12/2021-5/2022: 57,734;	12/2023-5/2024; 80,337;
6/2022-11/2022: 52,226;	6/2024-11/2024; 95,450;
12/2022-5/2023: 48,178;	12/2024-5/2025: 56,386 and
6/2023-11/2023: 64,331;	6/2025 to present 30,277.

Summary of modification or new units installed (dates approximate):

- 2016 a Pilot Dissolve Air Floatation (DAF) unit installed/modified, Aerial Photo#2;
- 2016 Tanks W5 and W6 installed/modified, Aerial Photo #2;
- 2018 DAF unit removed/modified, Aerial Photo #4;
- 2024 tanks T45, T46 installed/modified, Aerial Photo #5;
- 2024 tank T47 sludge tank installed/modified, Aerial Photo#5;
- 2024 cooling tower four evaporation system installed/modified, Aerial Photo#5; and
- 2024 tanks T134 clean wastewater tank installed/modified, Aerial Photo#5 (Tank under canvas building).

Apparent Violation/Summary

At the time of inspection, the facility was experiencing a seal leak at the flanged connection related to a pump occurring in front of tank W6 (See photo 5 and 6). It appeared contained and was unsure if they were using containment dike on sludge tank 147 (photo 4) next to tank W6 to contain some of the spill. The facility is located in MWRDGC combined sewer area, the facility provided photo of repair pump seal 4/8/2026 (See photo 24).

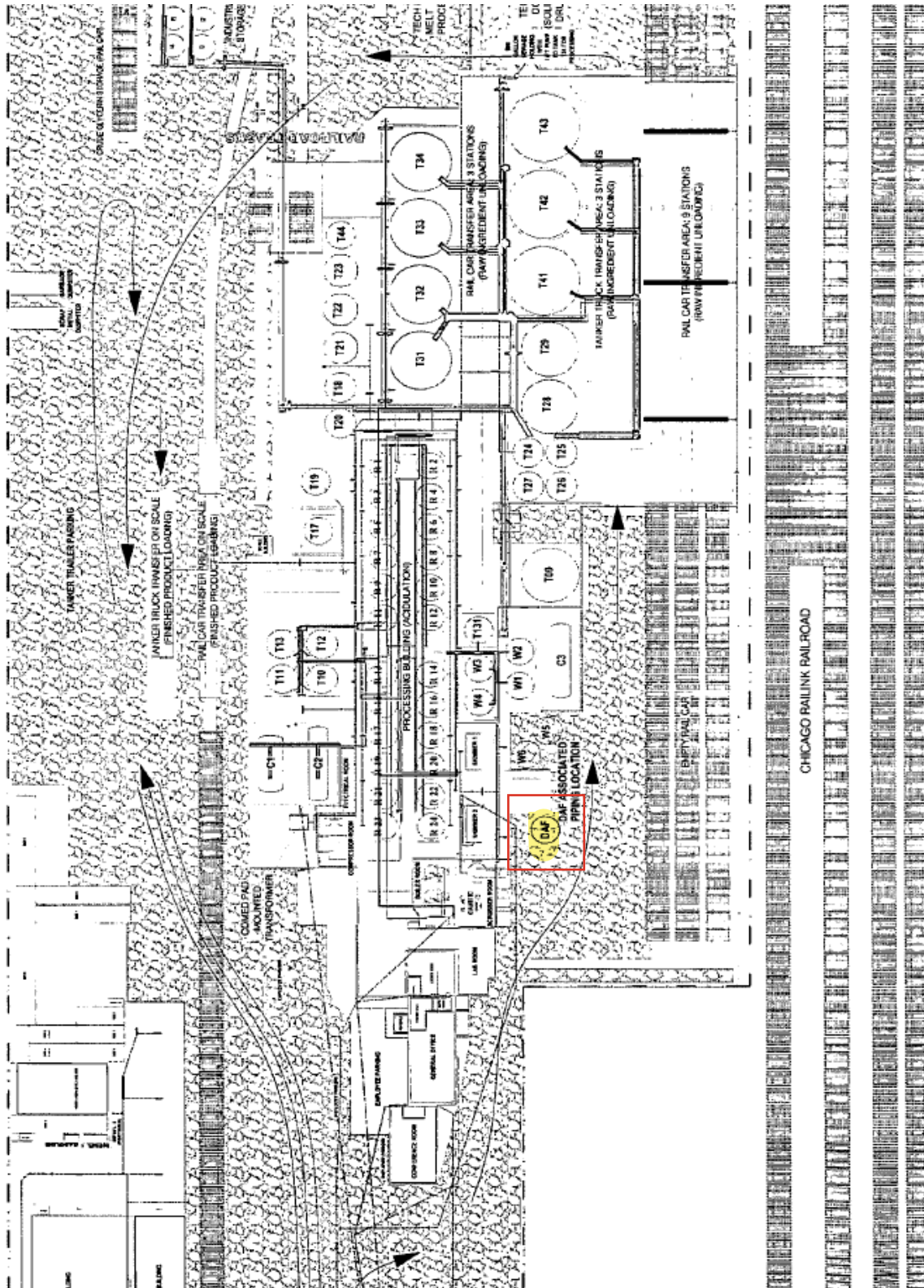
According to 35 Ill. Adm. Code 309.202 (a) and (d), a person must not cause or allow the construction of any new treatment works, sewer or wastewater source or cause or allow the modification of any existing treatment works, sewer, or wastewater source without a construction permit issued by the Agency.

The industrial pretreatment operator is required to obtain Class K certification Per 35 IAC 380.115(2)(A).

Facility appears to need WPC permit for the pretreatment plant and obtain Class K certification for their wastewater operators.

Attachments:

- Digital Photos, Maps, and Diagrams:
 - Site Diagram, BOA FOS Report, Tom Kolokythas, March 2017;
 - Aerial Photos 1 – 6 are dated off of Google Earth;
 - Site Diagram and Process Flow Chart are each dated and provided by DAI Environmental;
 - Photos 1-23, Ricardo Ng, April 3, 2026; and
 - Photo 24 provided by Pullman Innovations, April 8, 2026.
- Appendix A BOA permit application 3/7/2025.
- Appendix B BOA Odor study 12/5/2016.

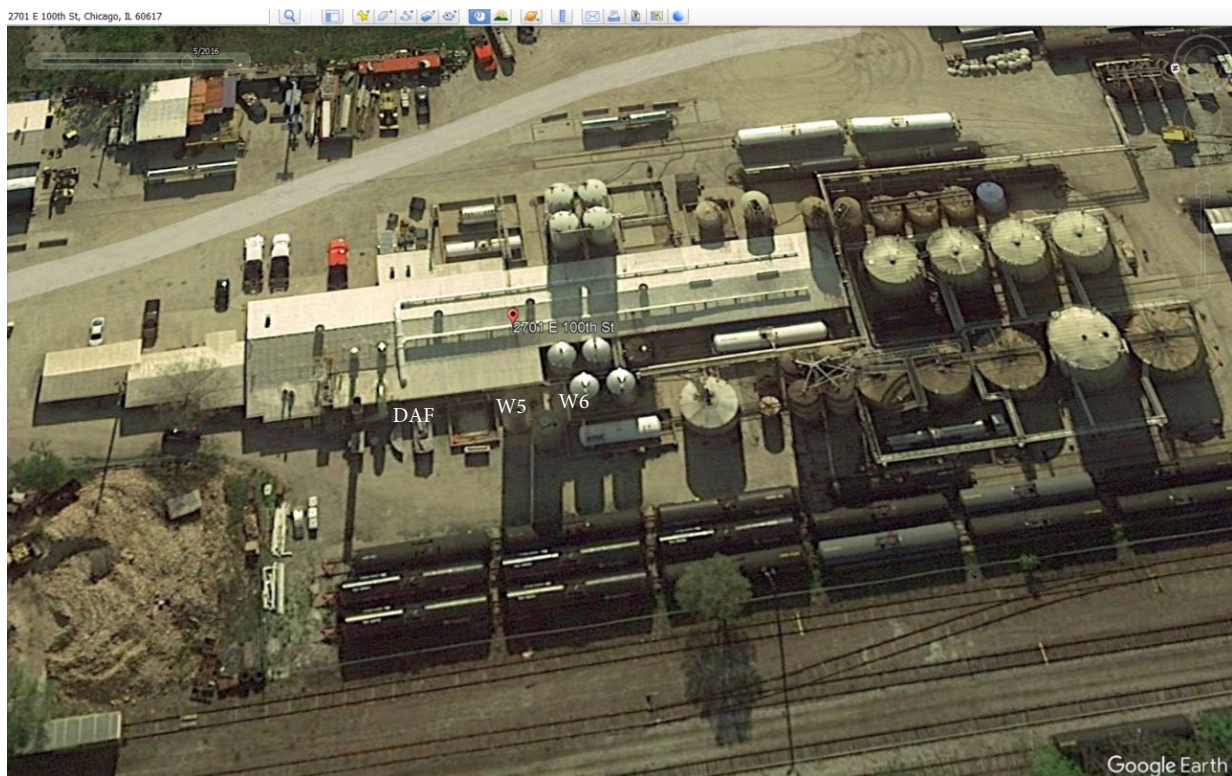


BOA Fugitive Dust Operating Program updated 3/17/2017, relates to Dissolve air floatation (DAF) unit pilot unit



Aerial Photo #1

4/2015, absence of DAF and tanks W5 and W6 related to wastewater, absence tank T45 and T46



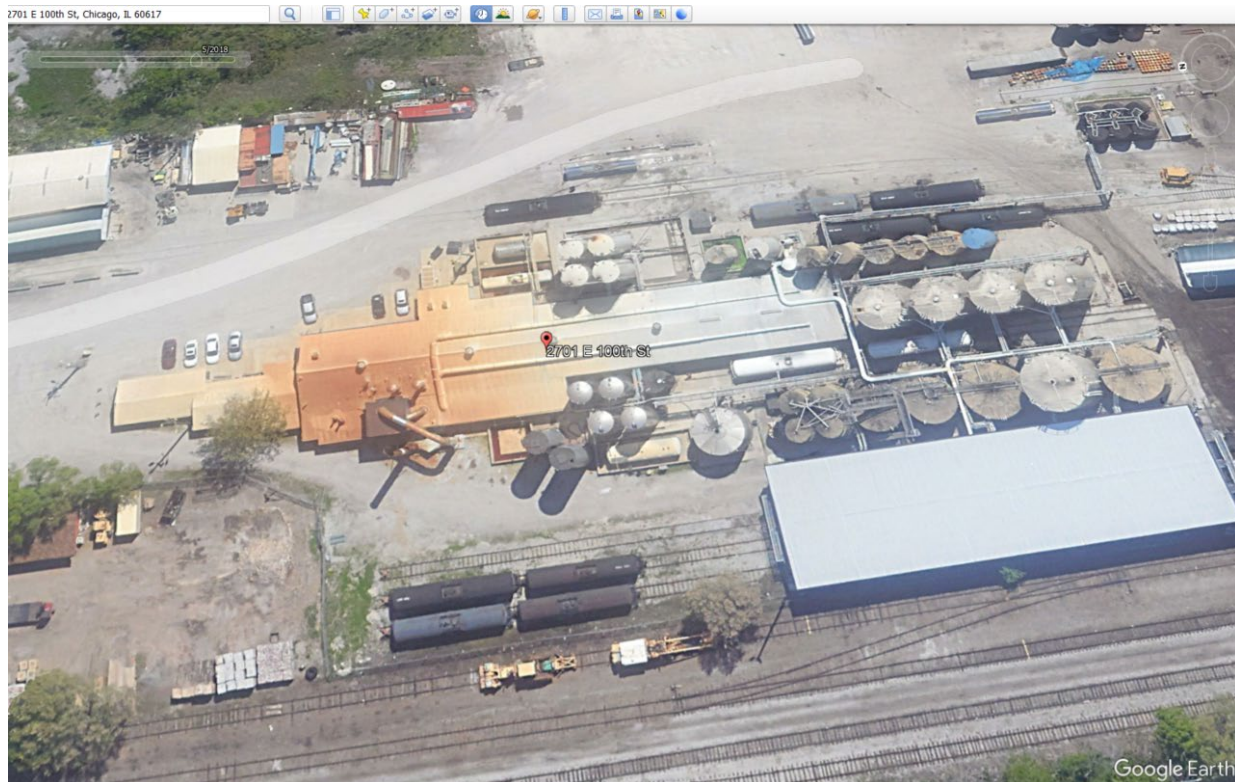
Aerial Photo #2

5/2016, presence of DAF unit and presence of tanks W5 and W6



Aerial Photo #3

4/2017, presence of DAF unit and tanks W5 and W6



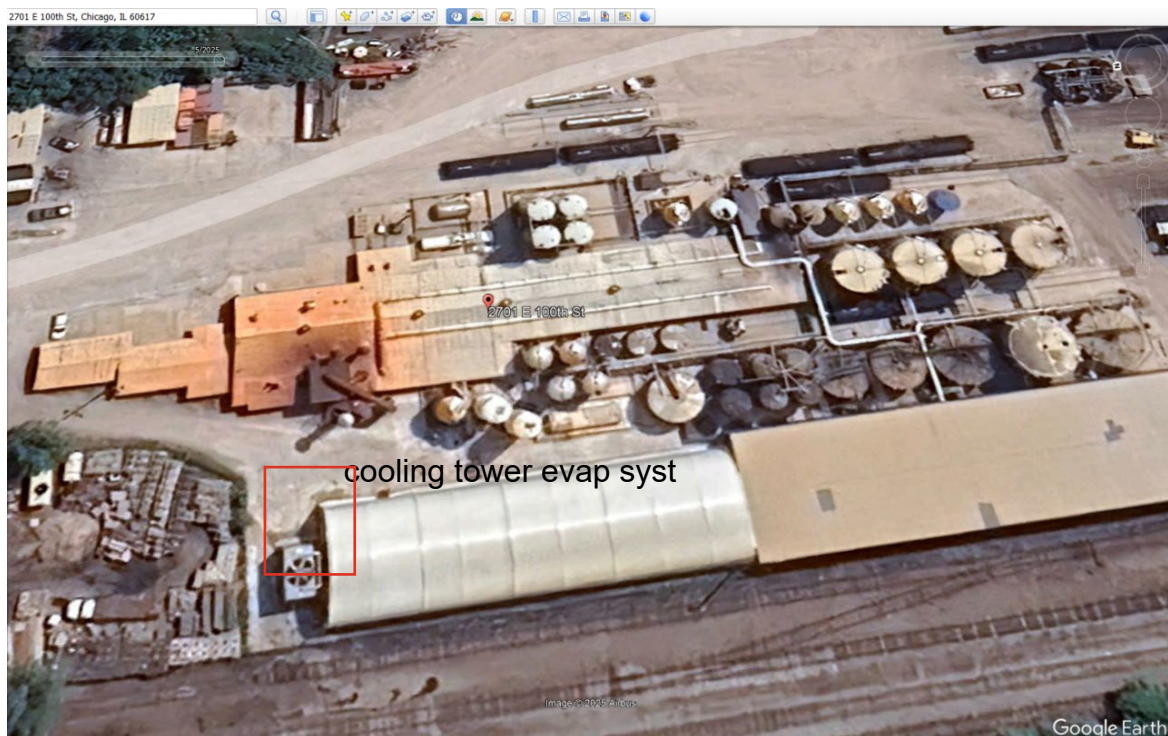
Aerial Photo #4

5/2018, absence of DAF unit, appeared removed, absence tank T45 and T46



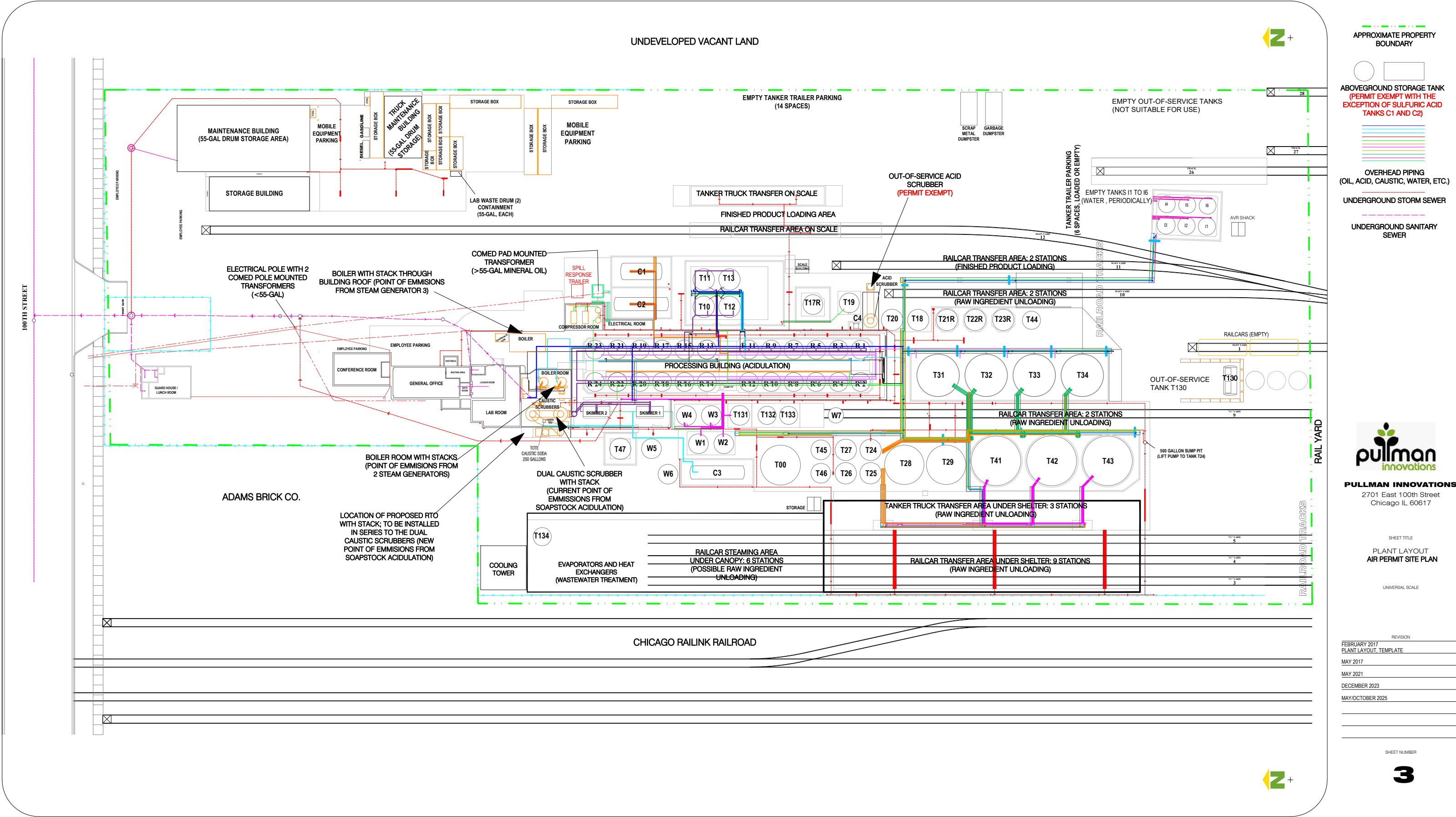
Aerial Photo #5

12/2024, presence of cooling tower related to heat exchanger ww evaporator 1 and 2 and Tank T47, sludge tank



Aerial Photo #6

5/2025, presence of cooling tower related to heat exchanger ww evaporator 1 and 2



- APPROXIMATE PROPERTY BOUNDARY
- ABOVEGROUND STORAGE TANK (PERMIT EXEMPT WITH THE EXCEPTION OF SULFURIC ACID TANKS C1 AND C2)
- OVERHEAD PIPING (OIL, ACID, CAUSTIC, WATER, ETC.)
- UNDERGROUND STORM SEWER
- UNDERGROUND SANITARY SEWER

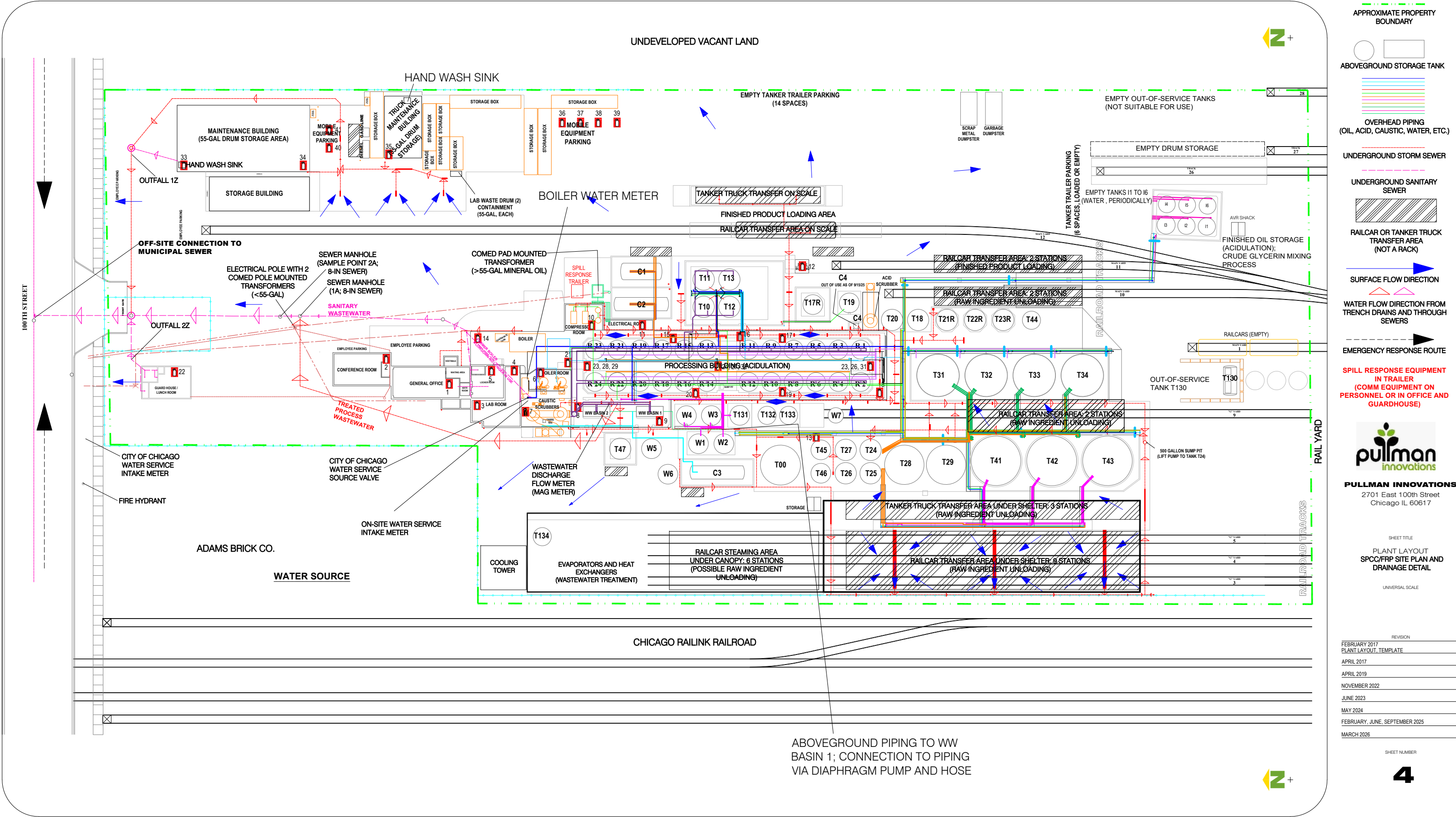
pullman
innovations
PULLMAN INNOVATIONS
2701 East 100th Street
Chicago IL 60617

SHEET TITLE
PLANT LAYOUT
AIR PERMIT SITE PLAN

UNIVERSAL SCALE

REVISION
FEBRUARY 2017 PLANT LAYOUT, TEMPLATE
MAY 2021
DECEMBER 2023
MAY/OCTOBER 2025

SHEET NUMBER



APPROXIMATE PROPERTY BOUNDARY

ABOVEGROUND STORAGE TANK

OVERHEAD PIPING (OIL, ACID, CAUSTIC, WATER, ETC.)

UNDERGROUND STORM SEWER

UNDERGROUND SANITARY SEWER

RAILCAR OR TANKER TRUCK TRANSFER AREA (NOT A RACK)

SURFACE FLOW DIRECTION

WATER FLOW DIRECTION FROM TRENCH DRAINS AND THROUGH SEWERS

EMERGENCY RESPONSE ROUTE

SPILL RESPONSE EQUIPMENT IN TRAILER (COMM EQUIPMENT ON PERSONNEL OR IN OFFICE AND GUARDHOUSE)

PULLMAN INNOVATIONS
2701 East 100th Street
Chicago IL 60617

SHEET TITLE
PLANT LAYOUT
SPCC/FRP SITE PLAN AND DRAINAGE DETAIL

UNIVERSAL SCALE

REVISION

FEBRUARY 2017	PLANT LAYOUT, TEMPLATE
APRIL 2017	
APRIL 2019	
NOVEMBER 2022	
JUNE 2023	
MAY 2024	
FEBRUARY, JUNE, SEPTEMBER 2025	
MARCH 2026	

SHEET NUMBER
4

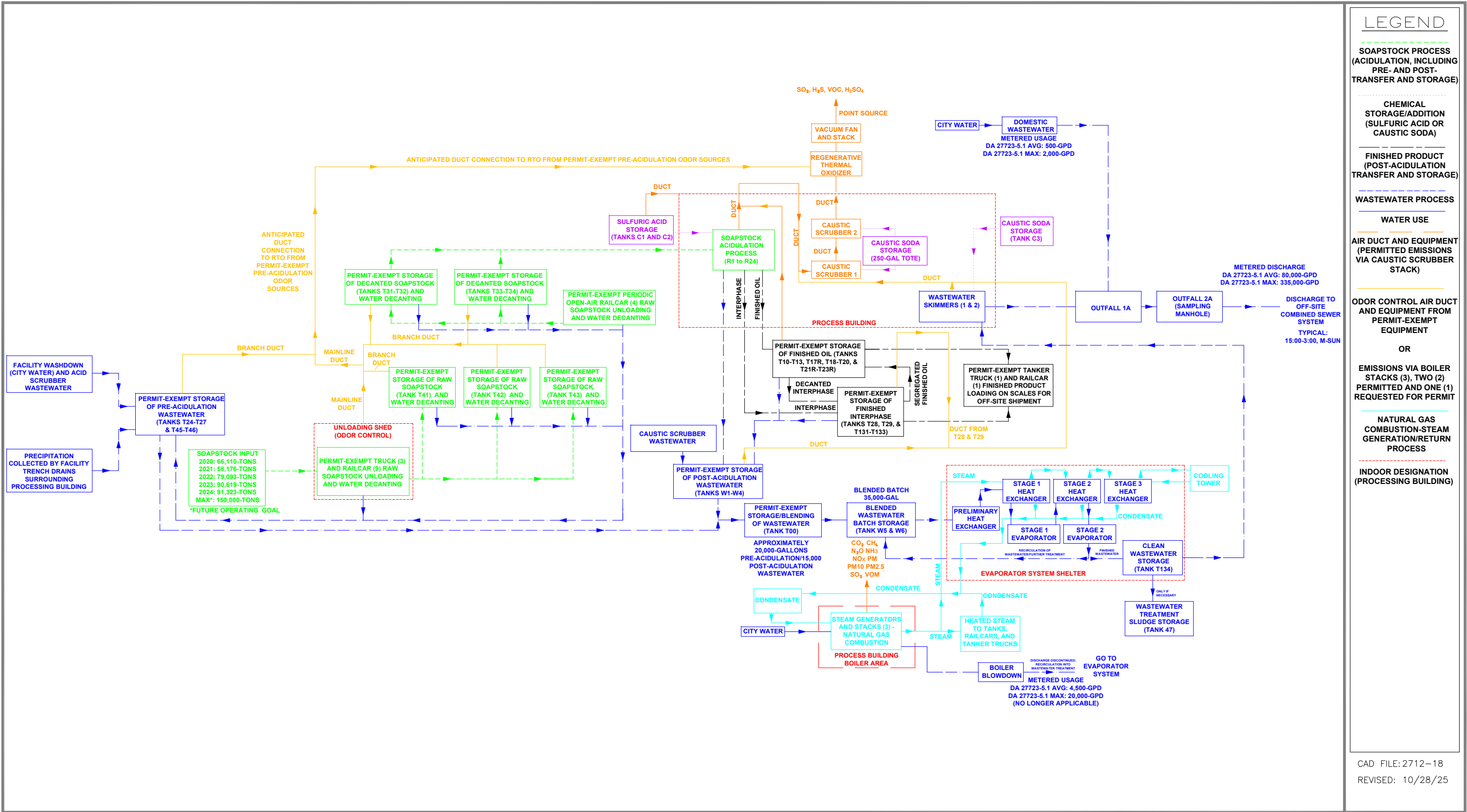




Photo 1: Air control unit, this was where the DAF unit was in the past



Photo 2: Cooling tower and framed building containing evaporator system



Photo 3: Sludge tank T147



Photo 4: inside the dike area of Sludge tank T47



Photo 5: At the time of inspection there was a seal leaking at the flanged connection, this was occurring in front of tank W6. The facility is under combined sewer area



Photo 6



Photo 7 Caustic tank C3



Photo 8 Tank TK00 blended tank wastewater pre and post acidulation

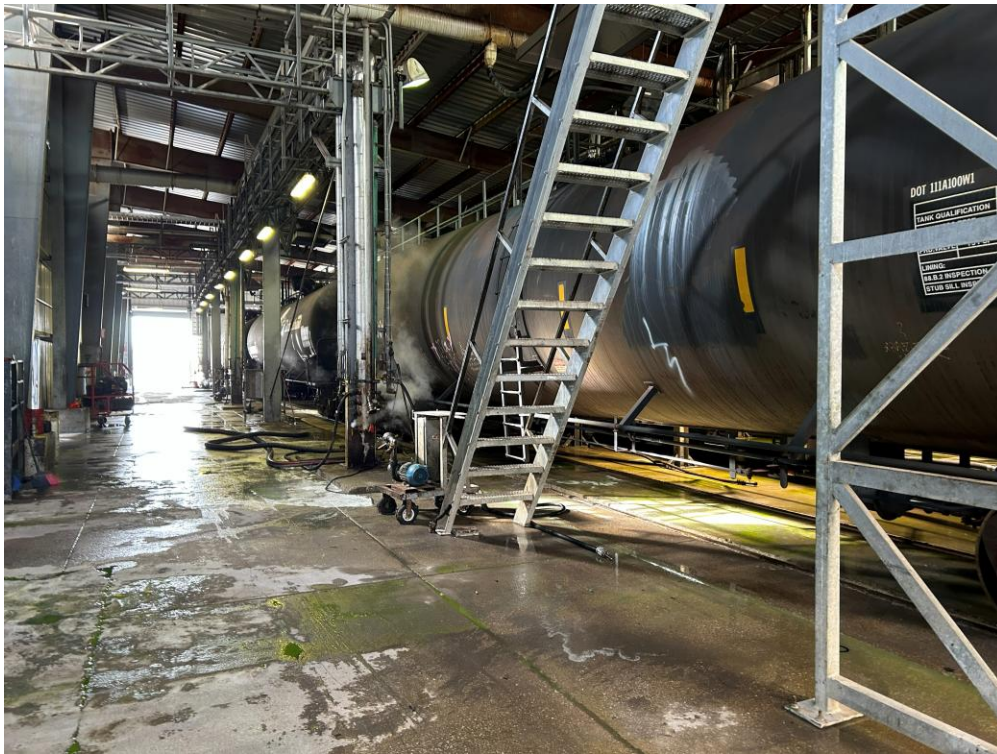


Photo 9 rail car loading/unloading building, overhead pipes, the green on the floor is soap according to Pullman Staff

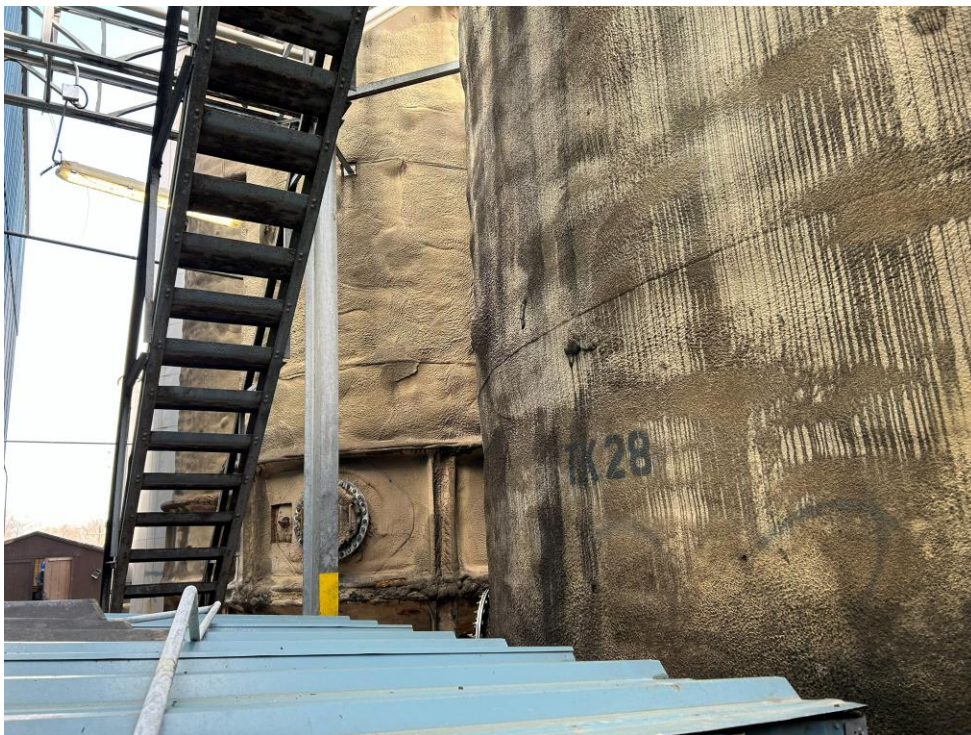


Photo 10 Tanks area T45, T46 and T24 to T27



Photo 11: Connection between tanks is hoses and quick connect



Photo 12 tank area T31 to T34 Advance Acidulation, quick connect hoses with portable pumps



Photo 13 floor drainage, it was noted by the facility that these are underground trenches

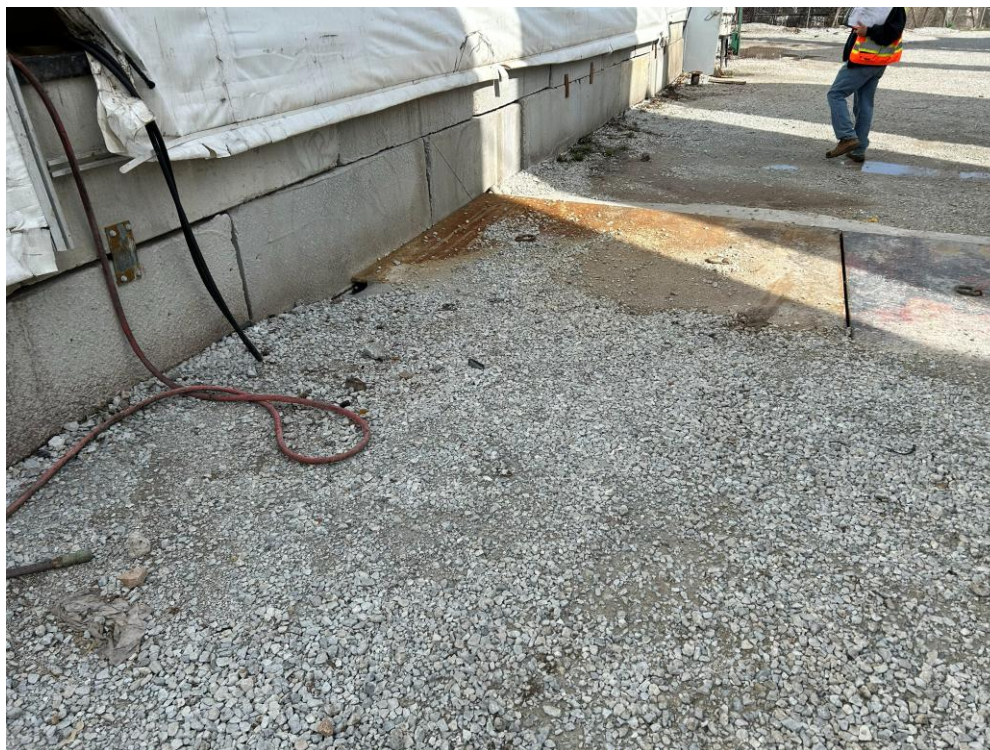


Photo 14 underground pipes from Skimmer 1 and Skimmer 2 to concrete dome building containing evaporator system

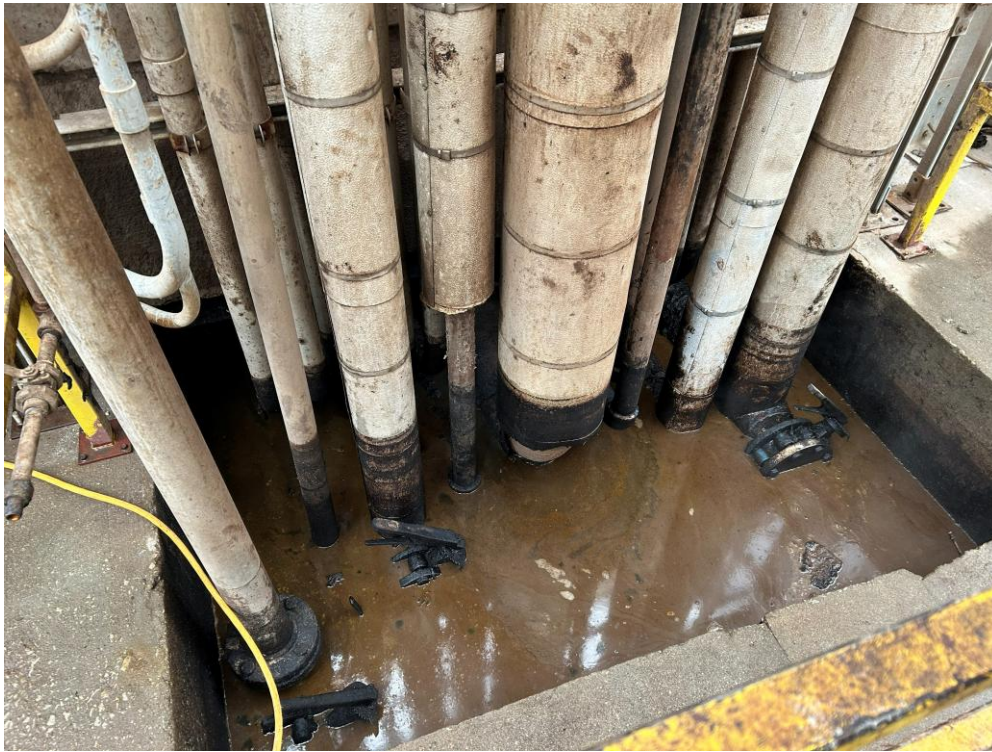


Photo 15 following these underground pipes inside concrete dome building containing evaporator system



Photo 16: Four Evaporator system units, inside concrete dome building



Photo 17: Four Evaporator system units, heat exchangers, inside concrete dome building



Photo 18 Sample port bucket, pumps, evaporator system

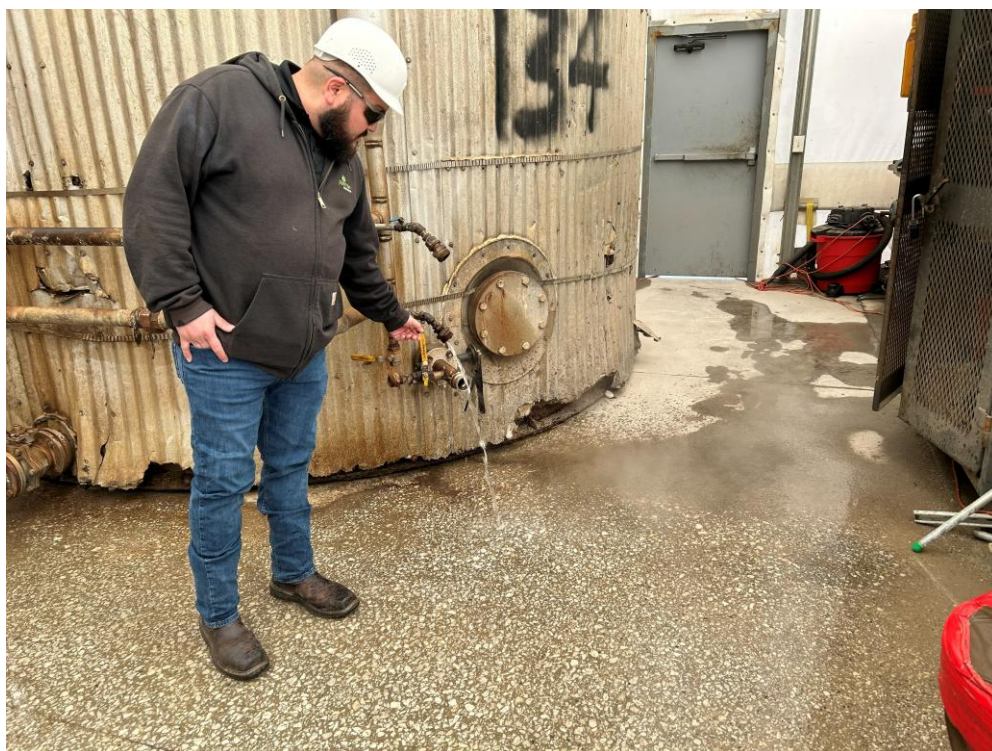


Photo 19 Tank 134 clean water from the evaporator system is stored here



Photo 20: Skimmer or oil water basins

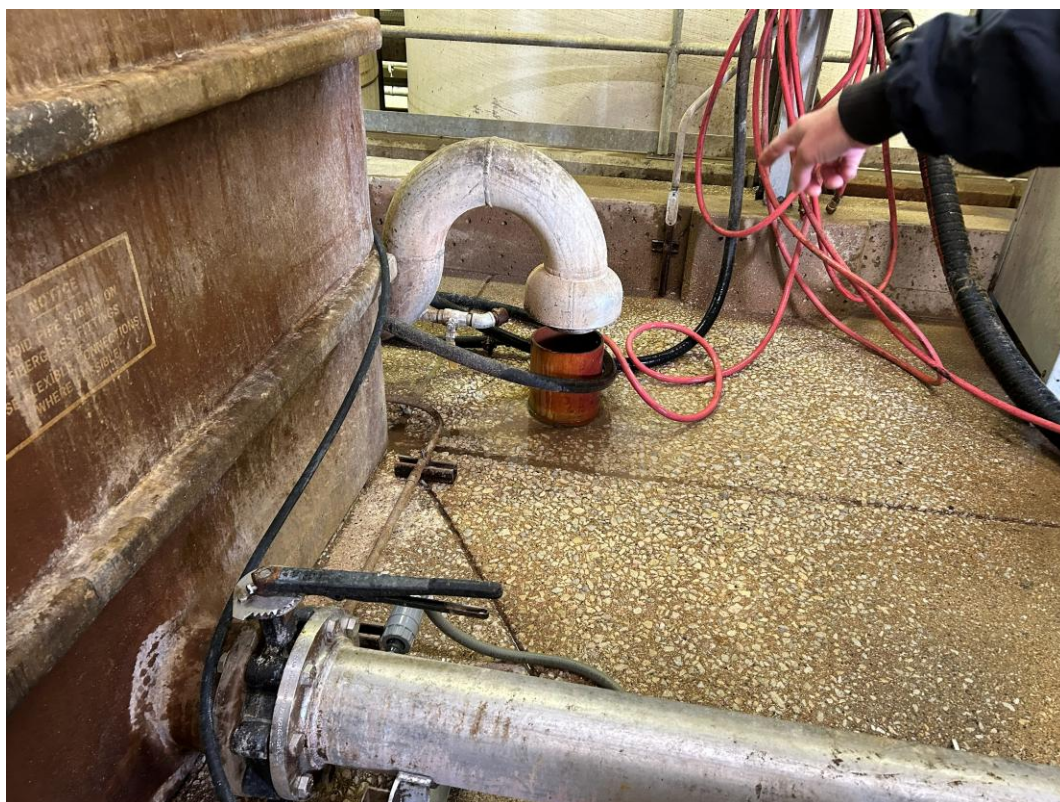


Photo 21 Discharge to MWRDGC, pretreatment

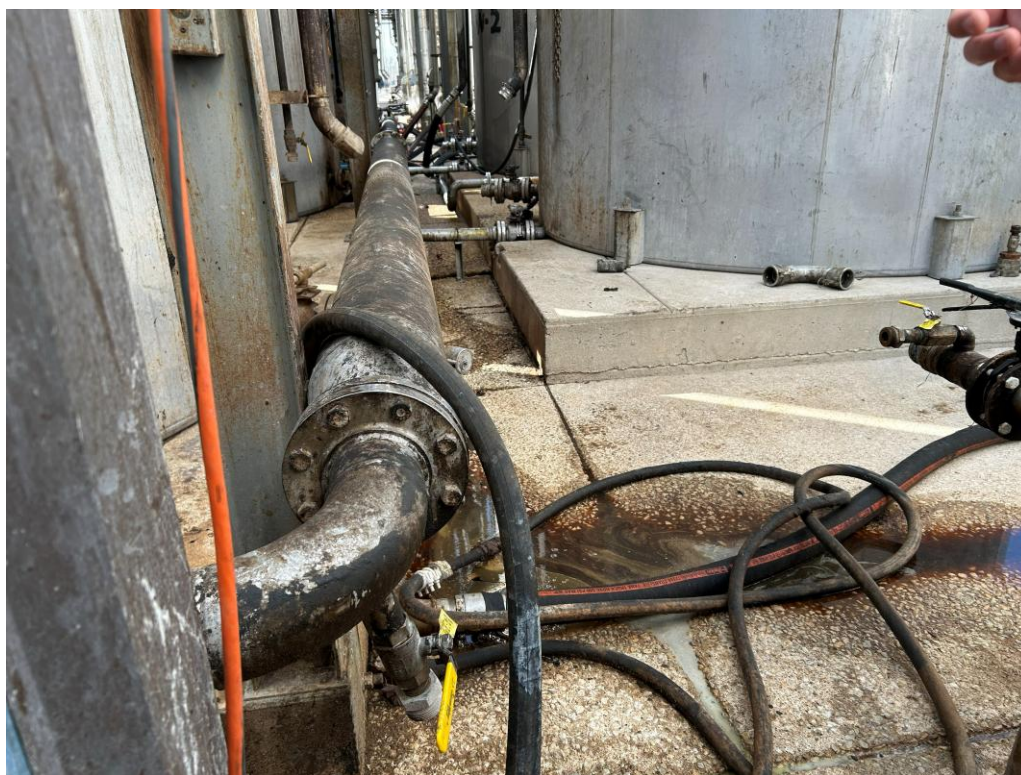


Photo 22 quick connection and hoses for transferring material between tanks

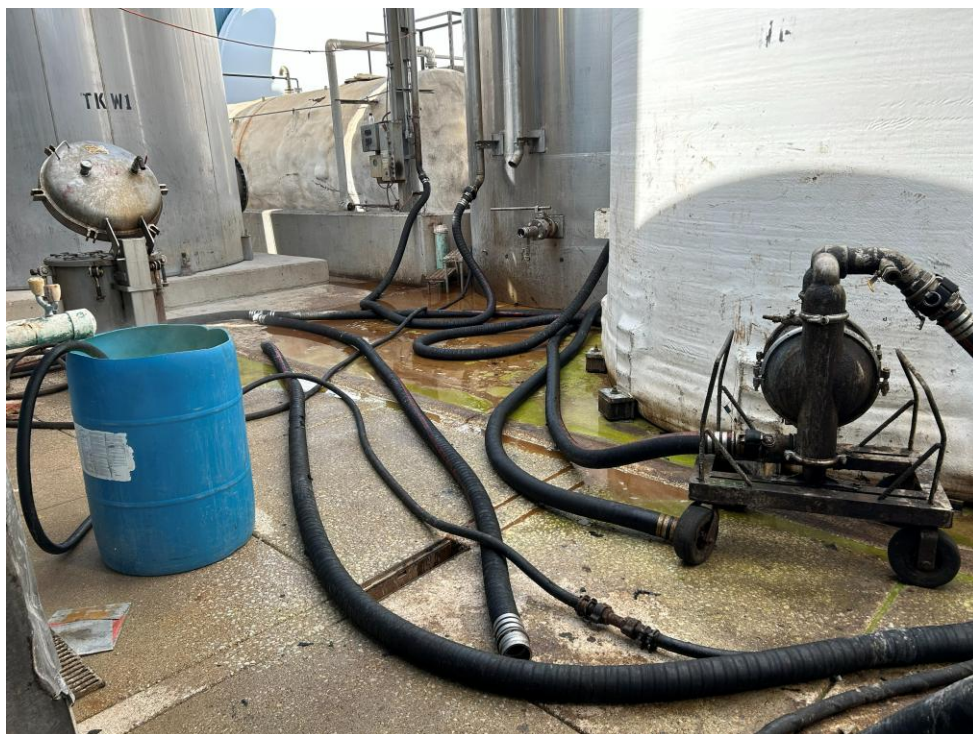


Photo 23 quick connection and hoses for transferring material between tanks



Photo 24 provided from Pullman Innovation 4/8/2026 repaired leak

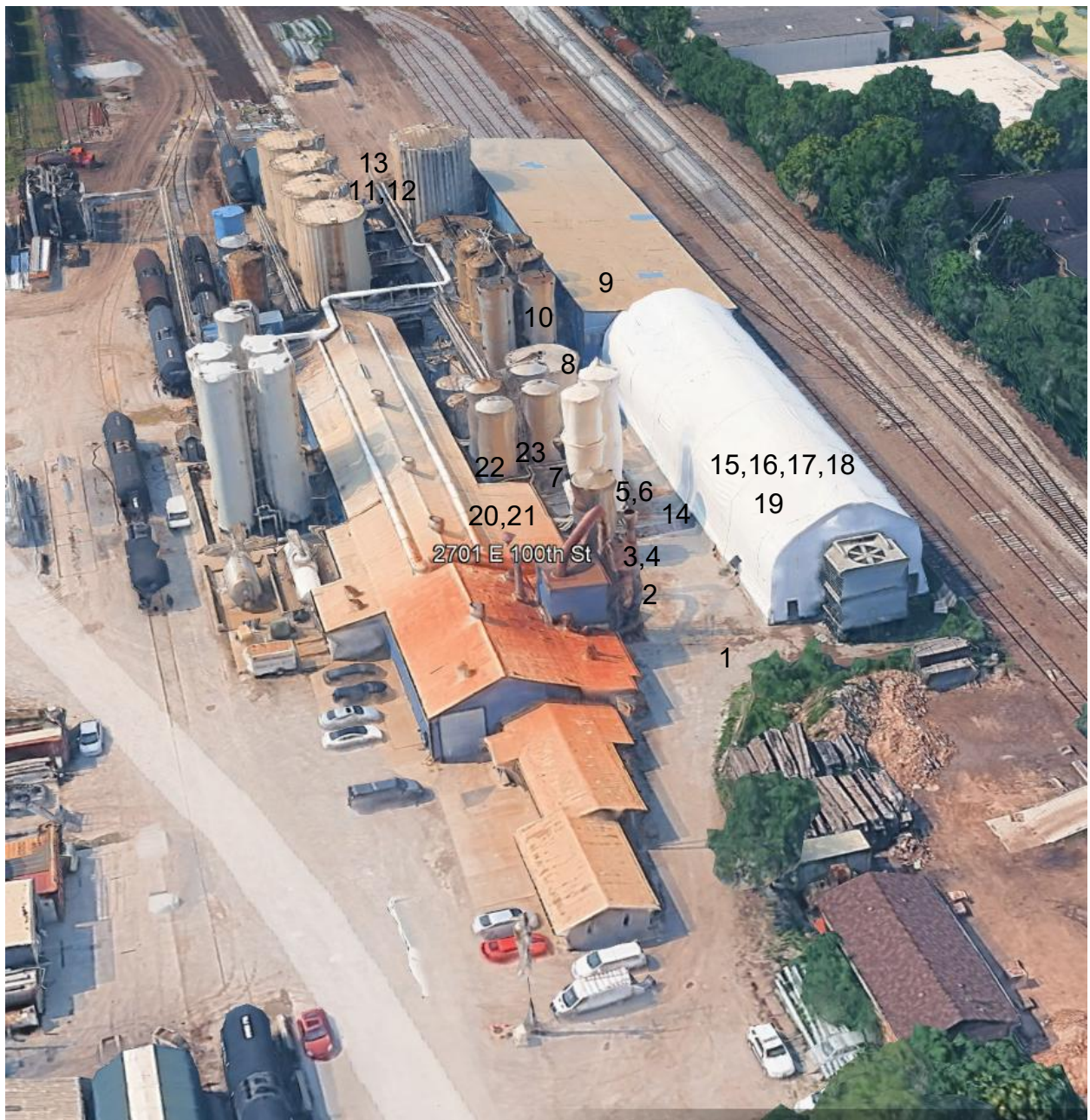


Photo Location Map