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PRELIMINARY ASSESSMENT/ VISUAL SITE INSPECTION

CATERPILLAR INC., AURORA PLANT
MONTGOMERY, ILLINOIS
ILD 005 070 651

FINAL REPORT

Prepared for

U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Waste Programs Enforcement
Washington, DC 20460

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EPA Region 5 Records Ctr.
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EXECUTIVE SUMMARY

Resource Applications, Inc. (RAI), performed a preliminary assessment and visual site inspection (PA/VSI) to identify and assess the existence and likelihood of releases from solid waste management units (SWMU) and other areas of concern (AOC) at the Caterpillar Inc., Aurora Plant (Caterpillar) facility in Montgomery, Kendall County, Illinois. This summary highlights the results of the PA/VSI and the potential for releases of hazardous wastes or hazardous constituents from SWMUs and AOCs identified. In addition, a completed U.S. Environmental Protection Agency (EPA) Preliminary Assessment Form (EPA Form 2070-12) is included in Attachment A to assist in prioritizing RCRA facilities for corrective action.

The facility assembles construction equipment from components which are made on site or brought in from off site. On-site production consists of cutting, grinding, and machining metals into the desired shape. Some of the parts are then heat treated or receive a phosphate coating, as the product requires. The parts are then painted, sometimes with just a primer and sometimes with a primer coat and a final coat. The various components are then moved to an assembly line where they are assembled into construction equipment. After assembly, the construction equipment is painted and filled with the appropriate working fluids. The equipment is then tested and stored prior to being shipped to the purchaser.

The primary hazardous waste streams generated at the Caterpillar facility are solvent-based paint sludge (D001, F003) and paint stripper (D002). The nonhazardous waste streams generated at the facility are water-based paint sludge, shop blast dust, iron phosphate sludge, coal flyash and boiler ash, waste quench oil, waste skim oil, industrial wastewater, API separator sludge, medical wastes, and incinerator ash. Lesser quantities of several other hazardous and nonhazardous wastes were generated at the Caterpillar facility as one-time generations.

Caterpillar submitted a Notification of Hazardous Waste Activity form to EPA on August 24, 1980. Caterpillar submitted a RCRA Part A permit application on September 12, 1980. This application listed one process code, S01 (container storage), with a 55,000-gallon capacity (part of the Resource Recovery Area, SWMU 1), and several waste codes: F001 (spent chlorinated solvents used in degreasing), F017 and F018 (paint wastes, since delisted by EPA), U226 (1,1,1, trichloroethane),

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and U239 (xylene). A modified RCRA Part A permit application was submitted on August 17, 1987. This application listed the same process (container storage) and capacity (55,000 gallons), but had only two waste codes: D001 (ignitables) and D002 (corrosives). The facility closed its container storage area in 1990. The closure certification was approved, and the RCRA Part A permit application was withdrawn by the Illinois Environmental Protection Agency (IEPA) on February 22, 1991. The facility is presently regulated as a generator of hazardous waste.

This facility was built in 1957 for the Caterpillar Tractor Company on land that had previously been used for farming. Several buildings have been added since 1957. Operations began in 1958. The facility was built for the purpose that it serves today, the manufacture and assembly of construction machinery. In about 1989, the Caterpillar Tractor Company underwent a corporate name change to Caterpillar Inc.

The facility consists of several buildings, totalling 4.9 million square feet under roof, on 429.2 acres. The facility presently employs about 3,300 people working in three shifts. Facility access is controlled by a 6-foot-high fence and guard houses. Entry into the buildings is controlled either by guards or by keycard. The Resource Recovery Area (SWMU 1) is separately fenced with another 6-foot-high fence with a locked gate within the perimeter fence of the facility. The facility is guarded 24 hours per day, 365 days per year. The facility has a hazardous materials response van and trained personnel to respond to releases of hazardous substances at the facility. The facility also has its own small fire department.

The PA/VSI identified the following seven SWMUs at the facility:

Solid Waste Management Units

1. Resource Recovery Area
2. Wastewater Treatment System
3. Coal Flyash Collection System
4. Shot Blast Dust Collectors
5. Paint Sludge Satellite Accumulation Areas
6. Medical Waste Accumulation Area
7. PCB Waste Accumulation Area

No Areas of Concern were identified during the PA/VSI.

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The potential for release to ground water, surface water, and on-site soils is low for all SWMUs. Wastes in SWMU 1 are managed on a concrete pad and all runoff is directed towards the Wastewater Treatment System (SWMU 2), which is constructed of concrete. SWMUs 3, 4, 5, 6, and 7 SWMUs manage waste indoors. SWMUs 3 and 4 discharge to the air under an IEPA air emissions permit. The potential for release to air from SWMUs 2, 5, 6, and 7 is low. Incinerator ash from SWMU 1 was observed blowing around during the VSI.

The nearest surface water body, the Fox River, is a lacustrine, limnetic, unconsolidated bottom, permanently flooded, diked wetland is located approximately 0.75 mile east of the facility. The Fox River is used for recreational, water supply, and drainage purposes.

Ground water in the area is used for municipal and industrial supply purposes. Three wells, used for drinking water and industrial water supply, are located on site. The Village of Montgomery relies primarily on five ground water wells, all upgradient of the facility. The closest well is located 1 mile northeast of the facility.

No critical habitats or endangered species are located in Kendall or Kane Counties.

RAI recommends that the nonhazardous incinerator ash in SWMU 1 be managed in a manner such that it does not become airborne when the wind blows. RAI recommends no further action for any of the other SWMUs at this time.

1.0 INTRODUCTION

PRC Environmental Management, Inc. (PRC), received Work Assignment No. C05087 from the U.S. Environmental Protection Agency (EPA) under Contract No. 68-W9-0006 (TES 9) to conduct preliminary assessments (PA) and visual site inspections (VSI) of hazardous waste treatment and storage facilities in Region 5. Resource Applications, Inc. (RAI), TES 9 team member, provided the necessary assistance to complete the PA/VSI activities for the Caterpillar Inc., Aurora Plant (Caterpillar) facility .

As part of the EPA Region 5 Environmental Priorities Initiative, the RCRA and CERCLA programs are working together to identify and address RCRA facilities that have a high priority for corrective action using applicable RCRA and CERCLA authorities. The PA/VSI is the first step in the process of prioritizing facilities for corrective action. Through the PA/VSI process, enough information is obtained to characterize a facility's actual or potential releases to the environment from solid waste management units (SWMU) and areas of concern (AOC).

A SWMU is defined as any discernible unit at a RCRA facility in which solid wastes have been placed and from which hazardous constituents might migrate, regardless of whether the unit was intended to manage solid or hazardous waste.

The SWMU definition includes the following:

- RCRA-regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells
- Closed and abandoned units
- Recycling units, wastewater treatment units, and other units that EPA has usually exempted from standards applicable to hazardous waste management units
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents. Such areas might include a wood preservative drippage area, a loading or unloading area, or an area where solvent used to wash large parts has continually dripped onto soils.

An AOC is defined as any area where a release of hazardous waste or constituents to the environment has occurred or is suspected to have occurred on a nonroutine and nonsystematic basis. This includes any area where a strong possibility exists that such a release might occur in the future.

The purpose of the PA is as follows:

- Identify SWMUs and AOCs at the facility
- Obtain information on the operational history of the facility
- Obtain information on releases from any units at the facility
- Identify data gaps and other informational needs to be filled during the VSI

The PA generally includes review of all relevant documents and files located at state offices and at the EPA Region 5 office in Chicago.

The purpose of the VSI is as follows:

- Identify SWMUs and AOCs not discovered during the PA
- Identify releases not discovered during the PA
- Provide a specific description of the environmental setting
- Provide information on release pathways and the potential for releases to each medium
- Confirm information obtained during the PA regarding operations, SWMUs, AOCs, and releases

The VSI includes interviewing appropriate facility staff; inspecting the entire facility to identify all SWMUs and AOCs; photographing all visible SWMUs; identifying evidence of releases; making a preliminary selection of potential sampling parameters and locations, if needed; and obtaining additional information necessary to complete the PA/VSI report.

This report documents the results of a PA/VSI of the Caterpillar facility (EPA Identification No. ILD 005 070 651) in Montgomery, Kendall County, Illinois. The PA was completed on July 6, 1992. RAI gathered and reviewed information from the Illinois Environmental Protection Agency (IEPA) and from EPA Region 5 RCRA files. Additional information pertaining to the facility was obtained from publications from the U.S. Department of Agriculture (USDA), U.S. Department of Commerce (USDC), U.S. Geological Survey (USGS), and the U.S. Department of the Interior (USDI). The VSI was conducted on July 7, 1992. It included interviews with facility representatives and a walk-through inspection of the facility. RAI identified seven SWMUs and no AOCs at the facility.

RAI completed EPA Form 2070-12 using information gathered during the PA/VSI. This form is included as Attachment A. The VSI is summarized and eight inspection photographs are included in Attachment B. Field notes from the VSI are included in Attachment C.

2.0 FACILITY DESCRIPTION

This section describes the facility's location; past and present operations; waste generating processes and waste management practices; a history of documented releases; regulatory history; environmental setting; and receptors.

2.1 FACILITY LOCATION

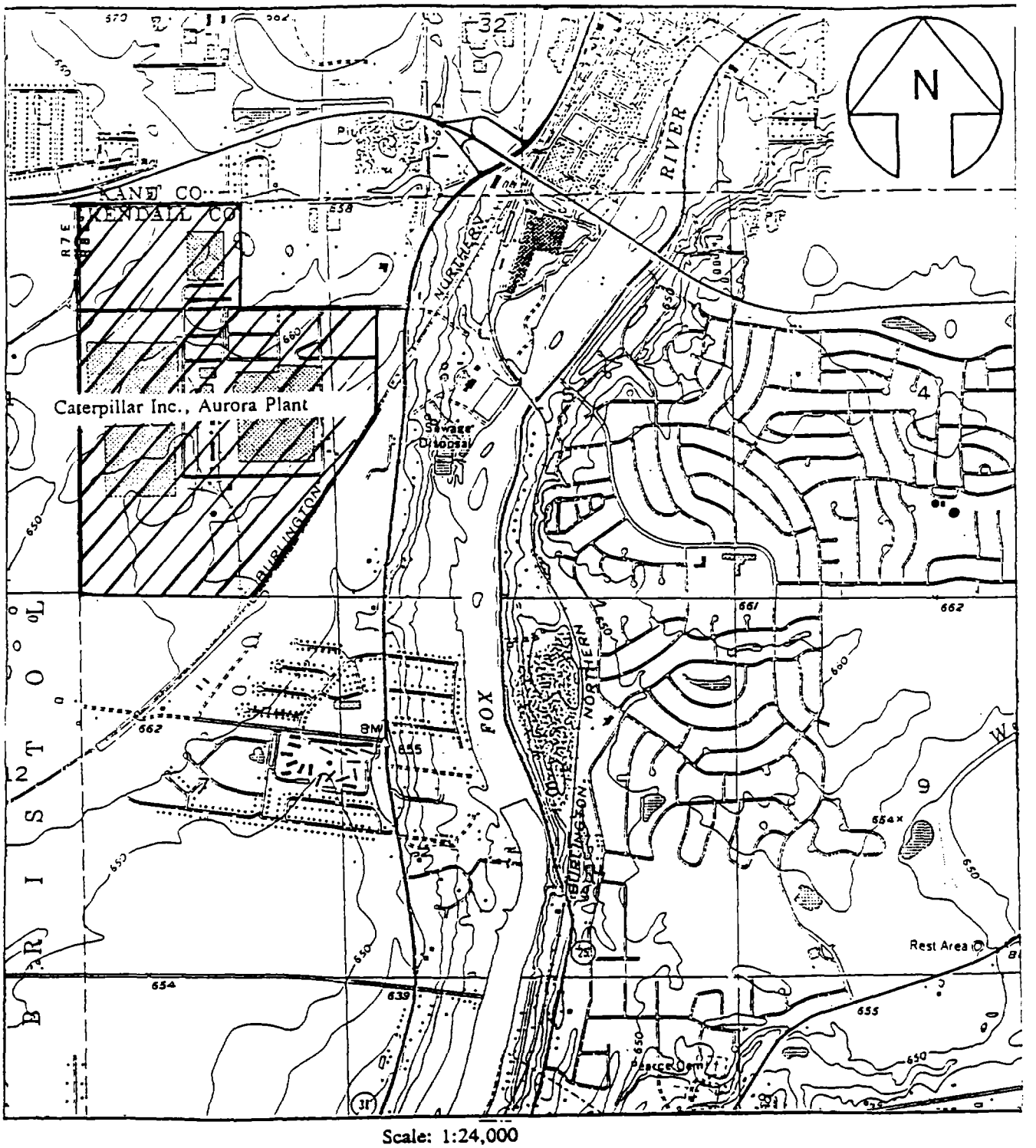
The Caterpillar facility is located on Route 31, south of Montgomery, Kendall County, Illinois (latitude 41°43′01″ N and longitude 88°21′33″ W). The facility, and its relationship to surrounding topographic features is shown in Figure 1. The facility's mailing address is P.O. Box 348, Aurora, Illinois, 60507. The facility occupies 429.2 acres in a mixed rural, commercial, and industrial area.

The Caterpillar facility is bordered on the north by Baseline Road, a former Caterpillar facility building, and U.S. Route 30; on the west by farmland; on the south by farmland; and on the east by a railroad, Route 31, some small businesses, and the Fox River.

2.2 FACILITY OPERATIONS

The facility assembles construction equipment from parts which are received from off site or made at the plant. These operations are conducted in various buildings located at this facility.

Parts received from off site are stored in building G. On-site production of parts is conducted in building B, and consists of cutting, grinding, and machining metal into the desired shape. Some welding is also performed in this building. Some of the parts are then heat treated, receive a phosphate coating, or are shot blasted, as the product requires. Some of the parts are painted with a primer in a paint booth prior to moving to the assembly line. The facility has several parts cleaners at various stages of production. The facility has several paint strippers that strip paint from parts that were incorrectly painted. Water-based, solvent-based, and dry paint are used at the facility. All painting is done in paint booths with spray guns or a closed flow coating system. Construction equipment is assembled on assembly lines in buildings K and H. The assembled equipment is then



QUADRANGLE LOCATION

Source: Modified from USGS, 1980

Caterpillar Inc., Aurora Plant Montgomery, Illinois
Figure 1 FACILITY LOCATION
Resource Applications, Inc.

painted with a primer and a final coat prior to being filled with antifreeze, hydraulic oil, etc. The equipment is then tested and prepared for shipping. Support operations are conducted in several other buildings. These include the boilers and associated baghouse in building N, the Wastewater Treatment System (SWMU 2) in building R, and the electrical switch gear in building Q. Several other buildings house other support operations. Solid wastes generated from facility operations and the SWMUs where they are managed are discussed in detail in Section 2.3.

This facility was built in 1957 for the Caterpillar Tractor Company on land that had previously been used for farming. Several buildings have been added since 1957. Operations began in 1958. The facility was built for the purpose that it serves today, the manufacture and assembly of construction machinery. In about 1989, the Caterpillar Tractor Company underwent a corporate name change to Caterpillar Inc.

The facility consists of several buildings, totalling 4.9 million square feet under roof, on 429.2 acres. The facility presently employs about 3,300 people, working in three shifts. Facility access is controlled by a 6-foot-high fence and guard houses. Entry into the buildings is either by a guard post or by keycard. The Resource Recovery Area (SWMU 1) is separately fenced by a 6-foot-high fence with a locked gate within the perimeter fence of the facility. The facility is guarded 24 hours per day, 365 days per year. The facility has a hazardous materials response van and trained personnel to respond to releases of hazardous substances at the facility. The facility also has its own small fire department. The facility has an on site medical staff of doctors and nurses which monitor the health of the workers and provide additional medical assistance as necessary.

2.3 WASTE GENERATION AND MANAGEMENT

Wastes are generated and managed at various locations throughout the facility. SWMUs and their current status are identified in Table 1. The location of SWMUs in relation to the facility layout is shown in Figure 2. Present and past wastes generated at the facility are summarized in Table 2. SWMUs are discussed in detail in Section 3.0. Facility generation and management of both hazardous and nonhazardous wastes are discussed below.

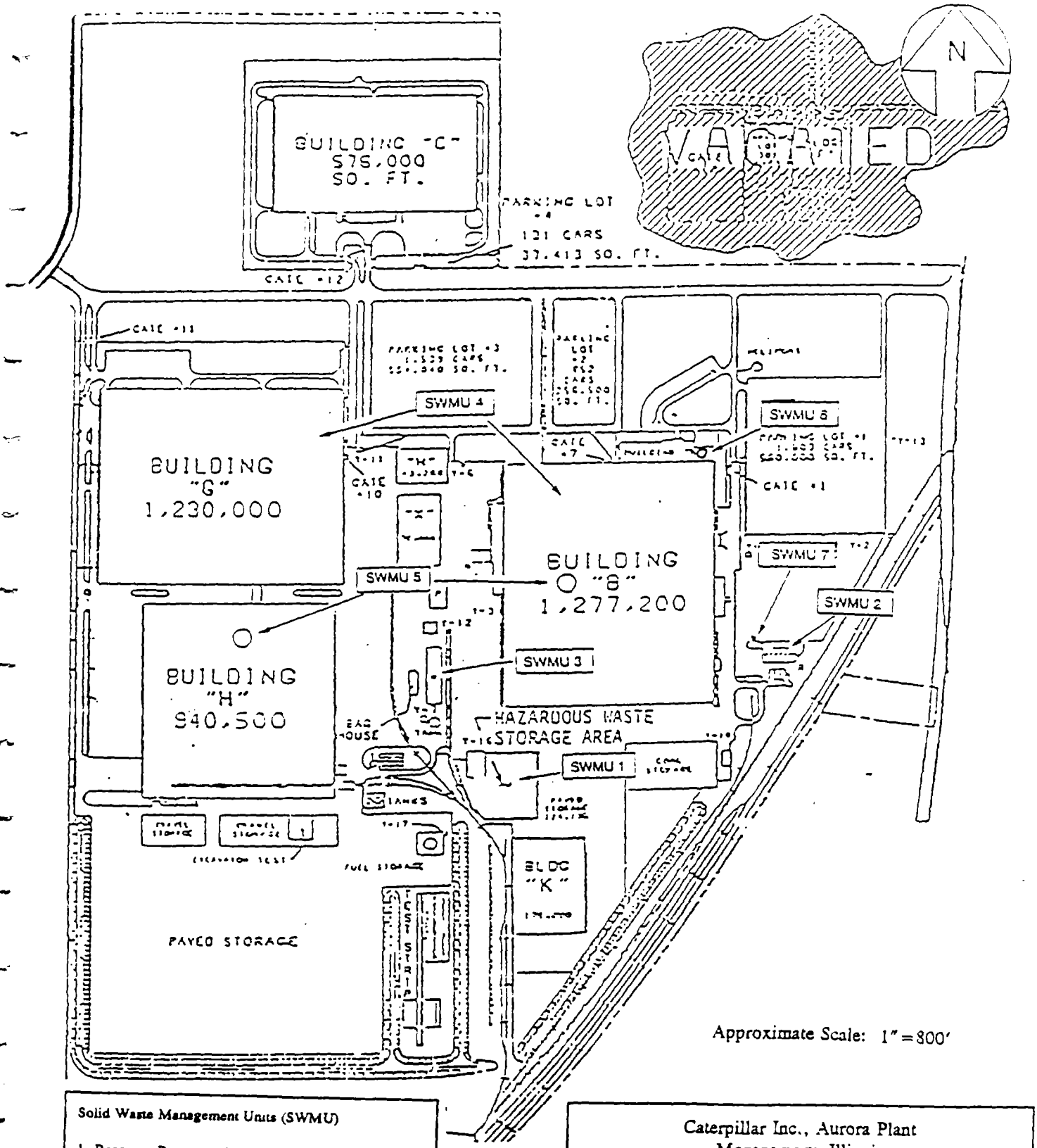
TABLE 1

SOLID WASTE MANAGEMENT UNITS

SWMU Number	SWMU Name	RCRA Hazardous Waste Management Unit[a]	Status
1	Resource Recovery Area	Yes	Active, RCRA closed in 1991, currently stores hazardous waste less than 90 days
2	Wastewater Treatment System	No	Active
3	Coal Flyash Collection System	No	Active
4	Shot Blast Dust Collectors	No	Active
5	Paint Sludge Satellite Accumulation Areas	No	Active
6	Medical Waste Accumulation Area	No	Active
7	PCB Waste Accumulation Area	No	Active

Note:

[a] A RCRA hazardous waste management unit is one that currently requires or formerly required submittal of a RCRA Part A or Part B permit application.



Solid Waste Management Units (SWMU)

1. Resource Recovery Area
2. Wastewater Treatment System
3. Coal Flyash Collection System
4. Shot Blast Dust Collectors
5. Paint Sludge Satellite Accumulation Areas
6. Medical Waste Accumulation Area
7. PCB Waste Accumulation Area

Caterpillar Inc., Aurora Plant
Montgomery, Illinois

Figure 2
FACILITY LAYOUT/SWMU LOCATION

Resource Applications, Inc.

TABLE 2

SOLID WASTES

Waste/EPA Waste Code[a]	Source	Solid Waste Management Unit[b]
Solvent-Based Paint Sludge/D001, F003	Painting Operations	1 and 5
Waste Paint Stripper/D002	Paint Stripping Operations	1
Water-Based Paint Sludge/NA	Painting Operations	1 and 5
Shot Blast Dust/NA	Shot Blasting	1 and 4
Iron Phosphate Sludge/NA	Phosphate Coating Process	1
Coal Flyash and Boiler Ash/NA	Boiler	3
Waste Quench Oil/NA	Heat Treating Process	None
Waste Skim Oil/NA	Wastewater Treatment System	2
Industrial Wastewater/NA	Various Processes	2
API Separator Sludge/NA	Wastewater Treatment System	2
Medical Waste/ORM[c]	Medical Facility	6

Notes:

[a] Not applicable (NA) designates nonhazardous waste.

[b] "None" indicates that the waste stream is not managed on site.

[c] "ORM" stands for other regulated material.

TABLE 2 (CONTINUED)

SOLID WASTES

Waste/EPA Waste Code[a]	Source	Solid Waste Management Unit[b]
Incinerator Ash	Trash Incinerator	1
PCB-Containing Waste Materials/ORM[c]	PCB-containing capacitors	7
Asbestos/ORM[c]	Asbestos abatement	Removed by contractor
Potassium Cyanide/P098[d]	Metallurgical Lab	1
Poison B/D008[d]	Metallurgical Lab	1
ORM-A/D002[d]	Metallurgical Lab	1
Oxidizer N.O.S./D001[d]	Metallurgical Lab	1
Corrosive Liquid/D002[d]	Metallurgical Lab	1
Alkaline Corrosive Liquid/D002[d]	Metallurgical Lab	1
Flammable Liquid/D001[d]	Metallurgical Lab	1
Lithium Bromide Solution/D002[d]	Removal of air cooling equipment	1

Notes:

[a] Not applicable (NA) designates nonhazardous waste.

[b] "None" indicates that the waste stream is not managed on site.

[c] "ORM" stands for other regulated material.

[d] These wastes were a one-time generation.

The primary hazardous waste streams generated at the Caterpillar facility are solvent-based paint sludge (D001, F003) and paint stripper (D002). The nonhazardous waste streams generated at the facility are water-based paint sludge, shot blast dust, iron phosphate sludge, coal flyash and boiler ash, waste quench oil, waste skim oil, industrial wastewater, API separator sludge, medical wastes, and incinerator ash. Lesser quantities of several other hazardous and nonhazardous wastes, including asbestos and polychlorinated biphenyl (PCB)-containing wastes, were generated at the Caterpillar facility as one-time generations.

Solvent-based paint sludge (D001, F003) is generated from the cleaning of the manufacturing painting equipment. The spray guns are washed with a butyl-cellusolve-based solvent, to remove paint residue. This waste is managed in a 55-gallon drum in one of the Paint Waste Satellite Accumulation Areas (SWMU 5). This waste was managed as a F016 and F017 hazardous waste until EPA delisted those waste streams. After accumulation in SWMU 5, the waste is moved to the Resource Recovery Area (SWMU 1) prior to being disposed of off site. A total of 1,235 gallons of this waste was generated during 1991 and was shipped off-site to the Safety-Kleen Corporation facility in Dolton, Illinois for reclamation.

Waste paint stripper (D002) is generated from stripping paint from improperly painted parts, prior to repainting. This process uses a caustic paint stripper and is located inside building G. This waste is drained from the stripping tanks into 55-gallon drums, which are then moved to SWMU 1. A total of 1,205 gallons of this waste was generated during 1991, and was shipped off site by Chemical Waste Management (CWM) to their Emelle, Alabama facility for treatment.

A water-based paint sludge (nonhazardous) is generated from cleanup of water-base painting operations at the facility. This waste is accumulated in 55-gallon drums in SWMU 5. The waste is then transported to SWMU 1, prior to shipment for disposal. This waste is managed as a special waste and 26,380 gallons were generated in 1991. This waste is shipped off site by CWM to their Controlled Waste Division (CWD) landfill in Menomonee Falls, Wisconsin, for disposal or to EPI of Toledo, Ohio, for disposal.

Shot blast dust (nonhazardous) is removed from the Shot Blast Dust Collectors (SWMU 4) by gravity. This waste is managed as a special waste in 55-gallon drums, at SWMU 4 for accumulation,

and at SWMU 1 for storage, prior to disposal at the CWM CWD landfill. A total of 800 gallons of this waste was removed in 1991.

An iron phosphate sludge (nonhazardous) is generated from phosphate coating operations. This waste is managed in 55-gallon drums, which are filled from the phosphate coating during cleanout. The waste is subsequently taken to SWMU 1 for accumulation prior to disposal. This waste is managed as a special waste and 2,035 gallons were generated during 1991. This waste is transported and disposed of by CWM at its Emelle, Alabama landfill.

Coal flyash and boiler ash (nonhazardous) is generated from the facility's coal-fired boiler and from particulate removal in the Coal Flyash Collection System (SWMU 3) associated with the boiler. This waste is managed as a special waste in a 20-cubic-yard dumpster. This waste was generated at the rate of 4,400 cubic yards per year in 1991, and is hauled by Great Lakes Disposal to the CDT Landfill in Joliet, Illinois.

Waste quench oil (nonhazardous) is generated from cleanout of the heat treating operation. This waste is generated in irregular quantities when the quench oil is no longer usable and is removed from the process tanks in bulk. Typically, the waste quench oil is pumped into trucks and disposed of with the skim oil from the Wastewater Treatment System (SWMU 2). Other times, the waste quench oil is pumped into trucks and disposed of separately. SWMU 2 does not manage waste quench oil. No waste quench oil was generated during 1991.

Waste skim oil (nonhazardous) is generated from oil skimming operations at SWMU 2. This waste is managed in a 5,000-gallon bulk tank (part of SWMU 2) and 163,800 gallons were generated in 1991. This waste is transported by Metalworking Lubricants for reclamation at their Indianapolis, Indiana facility.

Industrial wastewater (nonhazardous) is generated from various cooling and washing processes. This waste typically contains some oil and dissolved metals. This waste is treated by skimming surface oil and allowing solids to settle in the API separator, followed by batch treatment of the wastewater. The batch treatment process can include the addition of flocculants, precipitation, and pH adjustment, as necessary. Following batch treatment, the wastewater is run through an air

flotation tank where any additional sludge is removed and combined with the API separator sludge, prior to discharge to the Village of Montgomery Publicly Owned Treatment Works (POTW).

API separator sludge (nonhazardous) is generated from the operation of the API separator in SWMU 2. This sludge is generated at the rate of 40,000 gallons per month, and is managed in two 30,000-gallon holding tanks that are part of SWMU 2. This waste is then taken to the Metalworking Lubricants Co. for disposal at their Indianapolis, Indiana facility.

Medical waste is generated from the facility's two nurse's stations and doctor's office. This waste consists of "sharps" (that is, needles in an appropriate container), bandages, and used antiseptic wipes, generated in providing care to the facility's employees and is managed in the Medical Waste Accumulation Area (SWMU 6). Approximately 1 cubic yard per month of this waste is generated. This waste is hauled by Browning-Ferris Industries (BFI) for disposal. The facility representative was unable to provide additional information about this waste.

Incinerator ash (nonhazardous) is generated by burning trash (broken wood pallets, paper, cardboard, some plastic) in the facility's trash incinerator. The waste is taken from the incinerator to SWMU 1. In 1991, 1,220 cubic yards of this waste was generated. This waste was hauled by Great Lakes Disposal at the CDT landfill in Joliet, Illinois.

PCB-containing waste materials are generated in small quantities (typically less than one 55-gallon drum per year) at the facility during removal of PCB contaminated equipment (primarily ballasts and capacitors) as they need replacement. The facility is accumulating PCB-contaminated wastes at the PCB Waste Accumulation Area (SWMU 7). The facility has never had transformers that contain PCBs.

In the past, the facility has generated several other wastes. Asbestos was generated as part of an asbestos abatement program. The asbestos was removed several times by outside contractors during periods that the facility was shut down. Potassium cyanide (P098) was generated from an unknown process. The following wastes were generated as part of a lab pack from the metallurgical laboratory in 1989: Poison B (D008, 30 gallons), ORM-A (D002, 5 gallons), Oxidizer N.O.S. (D001, 5 gallons), corrosive liquid (D002, 10 gallons), alkaline corrosive liquid (D002, 5 gallons),

and flammable liquid (D001, 5 gallons). A lithium bromide solution (D002) was generated in 1987 during removal of air cooling equipment. All these wastes were managed in SWMU 1 prior to off-site disposal.

2.4 HISTORY OF DOCUMENTED RELEASES

This section discusses the history of documented releases to ground water, surface water, air, and on-site soils at the facility.

There have been two spills of water-based paint at the facility, both less than the reportable quantity (as listed in 40 Code of Federal Regulations Part 302). One spill occurred on pavement outside and was subsequently directed via the storm sewer to the facility's Wastewater Treatment System (SWMU 2). The second spill, inside the plant, led to the removal of 5 cubic yards of contaminated soil for disposal. The dates of these spills and the disposal facility for the contaminated soil was not known by the facility's representative.

Another spill of a nonhazardous red dye was discovered after it had washed into the facility's Wastewater Treatment System (SWMU 2). The dye had been dumped down a drain connected to SWMU 2. The facility representative stated that the spill was reported to IEPA, but no testing was required. The red dye was contained by SWMU 2. This spill was believed to be less than the reportable quantity for this red dye.

The facility has had several minor spills of acids and oils within the plant. All such incidents resulted in implementation of the facility's contingency plan. No additional information is available for these incidents.

2.5 REGULATORY HISTORY

Caterpillar submitted a Notification of Hazardous Waste Activity form to EPA on August 24, 1980. (No copy of this was available in EPA or IEPA files). Caterpillar submitted a RCRA Part A permit application on September 12, 1980 (Caterpillar, 1980). This application listed an S01 process code (container storage), with a 55,000-gallon capacity. The S01 process code referred to part of the

Resource Recovery Area (SWMU 1). The RCRA Part A permit application also listed the following waste codes: F001 (spent chlorinated solvent used in degreasing, which was listed protectively as the facility did not conduct degreasing operations), F017 and F018 (paint wastes, since delisted and now managed as a D001 and F003 waste), U226 (1,1,1 trichloroethane, not used) and U239 (xylene, used as a paint cleaning solvent, but was not disposed of under this waste code). IEPA notified Caterpillar that the RCRA Part A permit application was incomplete, citing many deficiencies, and denied the application (IEPA, 1981a). A modified RCRA Part A permit application was submitted on August 17, 1987 (Caterpillar, 1987). No correspondence regarding the Part A permit application was found in files available during the PA. This application listed the same process (container storage) and capacity (55,000 gallons), but had only two waste codes: D001 (ignitables) and D002 (corrosives).

In March 1989, the facility submitted a closure plan for the drum storage area part of the Resource Recovery Area (SWMU 1) (Caterpillar, 1989a). On June 21, 1989, IEPA rejected the closure plan, citing several deficiencies (IEPA, 1989). A modified closure plan was submitted in July 1989 (Caterpillar, 1989b). No copy of IEPA's approval of this closure plan was available, however, the closure certification was approved and the RCRA Part A permit application was withdrawn by IEPA on January 16, 1991 (IEPA, 1991b). The facility is presently regulated as a generator of hazardous wastes.

The Caterpillar facility has been inspected several times by IEPA (IEPA, 1981b, 1985a, 1985c, 1987b, 1987c, 1988, 1991a). Some violations of interim status standards were noted. These were mostly paperwork violations, (that is, failing to have a closure plan and failing to keep adequate training records). Several compliance inquiry letters and one pre-enforcement conference letter were issued, but all violations were subsequently resolved (IEPA, 1985b, 1985d, 1987a, 1987d, 1987e, 1987f, 1991a, 1991b, 1991c). The facility has not been inspected by IEPA since the January 1991 inspection.

The facility maintains several IEPA air emissions permits for various operations at the facility. These include permits for the boilers (including SWMU 3), Shot Blast Dust Collectors (SWMU 4), and the heat treating process (Caterpillar, 1980).

The facility is applying for a National Pollutant Discharge Elimination System (NPDES) permit for storm water discharge, which is not currently required, but will be required pursuant to the Clean Water Act of 1991. The facility discharges its wastewaters to the Village of Montgomery POTW, after treatment. The noncontact cooling water and the sanitary wastewaters are not treated prior to discharge. The Wastewater Treatment System (SWMU 2) discharge is permitted under a local sewer permit with the Village of Montgomery.

The facility does maintain two underground storage tanks (UST), one for gasoline and the other for diesel fuel. These were installed in 1987, replacing two tanks that were installed when the facility was built in 1957. According to the facility representative, no release was detected during the UST replacement, which included soil sampling. The new USTs are double-walled fiberglass and are equipped with a leak detection system which monitors the distribution pipes as well.

The facility did receive some industrial wastewaters from a parts washer, from an off-site caterpillar-owned satellite building with a different EPA Identification number during the early 1980s. These wastewaters were transported by truck and treated at the facility's Wastewater Treatment System (SWMU 2).

There has been no CERCLA activity at the facility.

2.6 ENVIRONMENTAL SETTING

This section describes the climate; flood plain and surface water; geology and soils; and ground water in the vicinity of the facility.

2.6.1 Climate

The climate in Kendall County is temperate and continental. The average daily temperature is 47.5 degrees Fahrenheit (°F). The lowest average daily temperature is 16°F in January. The highest average daily temperature is 83°F in July (NOAA, 1990).

The total annual precipitation for the county is 35.62 inches (Ruffner, 1985). The mean annual lake evaporation for the area is about 30 inches (USDC, 1968). The 1-year, 24-hour maximum rainfall is 2.5 inches (USDC, 1963).

The prevailing wind is from the west. Average wind speed is highest in March at 12 miles per hour from the north-northwest. The average wind speed is 10.3 miles per hour in a westerly direction (NOAA, 1990).

2.6.2 Flood Plain and Surface Water

The Caterpillar facility is not located in the 100- or 500-year floodplain (FEMA, 1982).

Surface water runoff from the site is handled by storm sewers. The runoff from areas that might pose environmental problems, such as the Resource Recovery Area (SWMU 1), aboveground raw material storage tank areas, and loading docks, is directed to the facility's Wastewater Treatment System (SWMU 2). The other storm water runoff is directed to an outfall to the Fox River with a concrete cascade. The facility is applying for an NPDES permit for this outfall pursuant to the Clean Water Act of 1991.

The nearest surface water body, the Fox River, is located 0.75 mile east of the facility and is used for drinking water supply, drainage, and recreational purposes.

2.6.3 Geology and Soils

Surface soils at the facility are classified as Urban Land (USDA, 1979). These soils have been extensively altered due to construction of buildings and roads. Typically, this land is built up and paved with streets and parking lots, altering the characteristics of the natural soils. The facility has a network of sewers and other underground utilities.

Beneath the surface soils lie soils belonging to the St. Charles Moraine unit of the Yorkville Member of the Wedron formation (Willman and Lineback, 1970). These soils typically consist of mostly gray to dark gray clayey tills and locally silty clayey till. These soils contain abundant small

pebbles, local lenses of silts, and, less commonly, lenses of sand and gravel. These deposits are from the Woodfordian substage of the Wisconsinan stage of glaciation. These soils are estimated to be about 100 feet thick in the vicinity of the facility (Willman, 1971).

The uppermost bedrock beneath the facility is part of the Ordovician Maquoketa Group, consisting mainly of grey and green shale, with some olitic limestones and dolomites in the upper half. Beneath the Maquoketa rocks are dolomites of the Galena-Platteville Group, sandstones of the Ancell (Glenwood-St. Peter) Group, and sandstones and dolomites of the Prairie du Chien Group. Beneath the Ordovician rocks are sandstones, siltstones, and dolomites of Cambrian age, underlain by Precambrian granite basement at depths of 3,000 to 5,000 feet. The exact thickness of the above-mentioned units are not known; however, the combined thickness of the Silurian rocks, and the Ordovician Maquoketa and Galena-Platteville groups is approximately 500 feet (Willman, 1971).

2.6.4 Ground Water

According to the facility representative, three deep wells exist at the facility to supply water for facility operations. These wells are used to supply drinking water as well as process water for the facility, and are from 1,346 to 1,384 feet deep. The water quality from these wells is monitored daily by the facility and tested quarterly by an outside laboratory. There have been no water quality problems. Approximately 111 million gallons of water are pumped from these wells annually.

No site-specific ground water information was available, so regional information is presented here. The glacial tills in the vicinity of Caterpillar may contain some sand and gravel lenses, which are good sources of ground water. Domestic ground water supplies are readily available from sand and gravel lenses. Two of the five wells utilized by the Village of Montgomery are in sand and gravel and located at depths of 59 feet and 82 feet (RAI, 1992). Dolomite lies directly beneath the glacial drift, and yields ground water at most locations through open crevices and channels. The deeper Galesville sandstone (of Cambrian age) is encountered at a depth of between 1,000 and 2,000 feet, and is used for industrial and municipal ground water supplies. In addition, the Ordovician-St. Peter sandstone is a local source of large water supplies, and is approximately 500 feet thick in the vicinity of Aurora (Bergstrom, et al., 1955).

The location of the nearest off-site ground water well is not known. The Village of Montgomery obtains its drinking water from ground water sources (RAI, 1992). Ground water in the area generally flows south. The depth to shallow ground water on the site is not known.

2.7 RECEPTORS

The Caterpillar facility occupies 429.2 acres in a rural, commercial, and industrial area in Montgomery, Illinois. Montgomery has a population of 3,363 people, and is located immediately south of Aurora, which has a population of 81,293 people.

The Caterpillar facility is bordered on the north by Baseline Road, a former Caterpillar facility building, and U.S. Route 30; on the west by farmland; on the south by farmland; and on the east by a railroad, Illinois Route 31, some small businesses, and the Fox River. The nearest school, Nicholson School, is located 1.9 miles northeast of the facility. The nearest residence is located 0.5 mile east of the facility.

Facility access is controlled by a 6-foot-high fence and guard houses. Entry into the buildings is either by a guard post or by keycard. The Resource Recovery Area (SWMU 1) is separately fenced by a 6-foot-high fence with a locked gate, within the perimeter fence of the facility. The facility is guarded 24 hours per day, 365 days per year. The facility has a hazardous materials response van and trained personnel to respond to releases of hazardous substances at the facility. The facility also has its own small fire department.

The nearest surface water body and wetland, the Fox River, is located approximately 0.75 mile east of the facility and is used for recreational, municipal water supply, and drainage purposes. The Fox River is classified as a lacustrine, limnetic, unconsolidated bottom, permanently flooded, diked wetland (USDI, 1984). No critical habitats or endangered species are located in Kendall or Kane Counties.

Ground water in the area is used for municipal and industrial supply purposes. Three wells, 1,346 to 1,384 feet deep and used for drinking water and industrial water supply, are located on site.

Ground water and surface water from the Fox River are used as a drinking water source in the area. The Village of Montgomery relies primarily on five ground water wells. The closest well is located upgradient, approximately 1 mile northeast of the facility (RAI, 1992). Some of the surrounding farms and residences may have wells that are used for drinking water.

3.0 SOLID WASTE MANAGEMENT UNITS

This section describes the seven SWMUs identified during the PA/VSI. The following information is presented for each SWMU: description of the unit, dates of operation, wastes managed, release controls, history of documented releases, and RAI's observations. Figure 2 shows the SWMU locations, and Section 2.3 discussed waste generation, management, and disposition.

SWMU 1	**Resource Recovery Area**
Unit Description:	The Resource Recovery Area is a paved, outdoor area, approximately 400 feet by 300 feet in size, located near building Y-16 in the south-central part of the facility. This unit is paved with 12-inch-thick concrete. This area is used to accumulate most wastes prior to disposal. This area includes a drum storage area where hazardous and nonhazardous wastes are accumulated, and concrete bins of various sizes which are used to manage incinerator ash and scrap metal (see Photographs No. 1 and 2). A portion of this unit has low walls to separate piles of scrap metal and incinerator ash.
Date of Startup:	This unit began operation in 1958.
Date of Closure:	This unit is active. The hazardous waste storage section of this unit was RCRA closed in 1991, and is currently used for less than 90-day accumulation of hazardous wastes.
Wastes Managed:	This unit manages solvent-based paint sludge (D001, F003) and caustic waste paint stripper (D002), and nonhazardous water-based paint sludge, shot blast dust, iron phosphate sludge and incinerator ash. This unit also managed various chemicals in lab packs when they were generated (see Table 2 for a complete list). These wastes are disposed of off-site by several different companies.

Release Controls:	The unit is located on a concrete pad and has concrete and wood walls approximately four feet high. The walls are used to separate piles of bulk material, the drum storage area, and storm sewer drains connected to the facility's Wastewater Treatment System (SWMU 2).
History of Documented Releases:	No releases from this unit have been documented.
Observations:	Over 100 drums of various wastes were present at the drum storage area portion of this unit during the VSI. Several piles of sorted scrap metal were observed in the concrete bins. Some incinerator ash was blowing around. RAI noted no other evidence of release.
SWMU 2	**Wastewater Treatment System**
Unit Description:	This unit treats industrial wastewaters before discharging into the Village of Montgomery POTW. The unit consists of a 10,000-gallon wet well, an API separator, three 100,000-gallon batch treatment tanks, two 30,000-gallon sludge wells, an air flotation tank, a 5,000-gallon concrete skim oil tank, and associated pumps, piping, water treatment chemical tanks, and control system. The system is located in and around building R. The industrial wastewater is first accumulated in the wet well prior to being pumped to the API separator. The API separator skims off oil and allows sludge to settle out, which is then moved to the sludge wells. The wastewater is then pumped to one of the batch treatment tanks for treatment. After treatment, the wastewater is pumped to an air flotation tank where sludge, generated during treatment (mostly an oily sludge, but may also contain precipitated iron and zinc), is removed prior to discharge to the Village of Montgomery POTW. This sludge is combined and managed with the API separator sludge. All tanks are constructed of 8-inch-thick concrete, and are located aboveground except the skim oil

tank, which is an aboveground 5,000-gallon steel tank (see Photograph No. 3).

Date of Startup: This unit began operation in 1968.

Date of Closure: This unit is active.

Wastes Managed: This unit manages nonhazardous industrial wastewaters generated during facility operations, storm water runoff from portions of the facility, waste skim oil, and API separator sludge that the unit generates during operation. The skim oil and API separator sludge are disposed of off-site by Metalworking Lubricants of Indianapolis, Indiana.

Release Controls: The water treatment chemical tanks and the control system are contained inside a building. The remainder of the unit is located outdoors. All of the process tanks are made of concrete approximately 8 inches thick.

History of Documented Releases: No releases from this unit to the POTW, exceeding permit limitations, have been documented since 1985. No releases to on-site soils, surface water, ground water, or air from this unit have been documented.

Observations: The unit was in operation at the time of the VSI. The concrete that was visible was in good condition. RAI noted no evidence of release.

SWMU 3 **Coal Flyash Collection System**

Unit Description: This unit consists of a baghouse, filtering equipment, and a 20-cubic-yard steel dumpster used to collect flyash from the coal-fired boilers

that supply heat to the facility. The baghouse and filtering equipment are located in building N and the dumpster is located adjacent to building N. The baghouse and filtering equipment are constructed primarily of steel. The unit uses cyclone separators and filters to separate the flyash, which then falls into the dumpster (see Photograph No. 4).

Date of Startup:	This unit began operation about 1981.
Date of Closure:	This unit is active.
Wastes Managed:	This unit manages coal flyash (nonhazardous) from the burning of coal in the facility boilers. This waste is hauled by Great Lakes Disposal to the CDT Landfill in Joliet for disposal.
Release Controls:	This unit is a release control for flyash from the burning of coal for the boilers. Flyash is collected in a steel dumpster.
History of Documented Releases:	No releases from this unit that exceed its IEPA air emissions permit have been documented.
Observations:	No visible emissions were coming from this unit. RAI noted no evidence of a release. The dumpster used to collect flyash was not covered.

SWMU 4 **Shot Blast Dust Collectors**

Unit Description: The unit collects dust generated from the shot blasting operations in the northwest part of building B and in building G. The unit consist of Wheelabrator cyclonic dust collectors and 55-gallon steel drums. The dust collectors are located above the shot blast units and vacuum

shot blast dust from the exhaust air streams and deposit it into the drum (see Photograph No. 5).

Date of Startup: This unit began operation about 1981.

Date of Closure: This unit is active.

Wastes Managed: This unit manages shot blast dust (nonhazardous) from the shot blast operation. When full, the accumulation drum is moved to SWMU 1 prior to off-site disposal at the CWM Landfill.

Release Controls: The unit is a release control for air emissions. The waste is a solid and is contained in a drum. The unit is located indoors on a concrete floor. The unit operates under an IEPA air emissions permit. No floor drains are located in the vicinity of this unit.

History of Documented Releases: No releases exceeding the IEPA air emissions permit from this unit have been documented.

Observations: The unit was not being used at the time of the VSI. RAI noted no evidence of release.

SWMU 5 **Paint Sludge Satellite Accumulation Areas**

Unit Description: The unit consists of 55-gallon steel drums located adjacent to paint booths in buildings B and H. The drums contain solvent-based paint sludge (F003, D001) and water-based paint sludge (nonhazardous), generated from cleaning painting equipment. This unit is located in designated areas approximately 10 feet by 30 feet, on a concrete floor at least 8 inches thick (see Photograph No. 6).

Date of Startup:	This unit began operation in 1958.
Date of Closure:	This unit is active.
Wastes Managed:	This unit manages solvent-based paint sludge (D001, F003) and water-based paint sludge (nonhazardous, managed as a special waste) separately. After accumulation, the drums are moved to SWMU 1 prior to off-site disposal.
Release Controls:	There are no floor drains located in the vicinity of this unit. This unit is located on a concrete floor.
History of Documented Releases:	No releases from this unit have been documented.
Observations:	The waste accumulation drum was not present at the time of the VSI. There were several product drums in this area. RAI noted no evidence of release.

SWMU 6 **Medical Waste Accumulation Area**

Unit Description:	This unit consists of a red plastic bag in a 1-cubic-yard cardboard box located in the medical supply room in building A. This unit is used to manage medical wastes generated from the facility's on-site medical staff. This unit is located in building B (see Photograph No. 7).
Date of Startup:	This unit began operation in 1958.
Date of Closure:	This unit is active.
Wastes Managed:	This unit manages assorted medical wastes, including "sharps" and bandages.

Release Controls:	This unit is located inside on the ceramic tiled concrete floor. There are no floor drains in the vicinity of this unit.
History of Documented Releases:	No releases from this unit have been documented.
Observations:	At the time of the VSI, the bag was partially filled. RAI noted no evidence of release. The lid of the box was uncovered for the photograph.

SWMU 7 **PCB Waste Accumulation Area**

Unit Description:	This area consists of two 55-gallon steel drums of PCB-contaminated capacitors, located in building Q, in a steel bin, on a concrete floor (see Photograph No. 8).
Date of Startup:	This unit began operation about 1980.
Date of Closure:	This unit is active.
Wastes Managed:	This unit manages PCB-contaminated wastes generated at the facility.
Release Controls:	The drums are located in a steel bin with 8-inch sides, located inside building Q on the north wall, on a concrete floor. The drums are filled with capacitors and an oil and grease absorbent.
History of Documented Releases:	No releases from this unit have been documented.
Observations:	The drums and steel bin were in good condition. Two boxes of unused oil and grease absorbent were also in the area. RAI noted no evidence of release.

4.0 AREAS OF CONCERN

No AOCs were identified by RAI during the PA/VSI. Caterpillar has two USTs at the facility, but these are of double-walled construction with interstitial monitoring. All releases at the facility have been remediated.

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5.0 CONCLUSIONS AND RECOMMENDATIONS

The PA/VSI identified seven SWMUs and no AOCs at the Caterpillar facility. Background information on the facility's location; operations; waste generation and management; history of documented releases; regulatory history; environmental setting; and receptors is presented in Section 2.0. SWMU-specific information, such as the unit's description, dates of operation, wastes managed, release controls, history of documented releases, and observed condition, is presented in Section 3.0. AOCs are discussed in Section 4.0. Following are RAI's conclusions and recommendations for each SWMU. Table 3, at the end of this section, summarizes the SWMUs at the facility and the recommended further actions.

SWMU 1 **Resource Recovery Area**

Conclusions: This area manages all wastes generated at the facility excluding the liquid wastes, which are managed in bulk. This area is located outdoors and is surrounded by a 6-foot-high fence. Some incinerator ash was blowing from the incinerator ash pile. The potential for release to on-site soils, surface water, and ground water from this SWMU is low, due to the unit being located on a concrete pad and all runoff being directed to SWMU 2. Some of the nonhazardous incinerator ash is picked up by the wind and becomes airborne.

Recommendations: RAI recommends the incinerator ash be managed so that it does not become airborne.

SWMU 2 **Wastewater Treatment System**

Conclusions: The facility's Wastewater Treatment System treats industrial wastewaters generated from the facility and storm water runoff from certain areas of the facility. This SWMU is currently operating in compliance with its sewer discharge permit. The potential for release to ground water, surface water, on-site soils, and air from this unit is

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low, due to the unit's construction, operation, and the nature of the wastes managed. This unit discharges to the Village of Montgomery POTW under a local sewer permit.

Recommendations: RAI recommends no further action for this SWMU at this time.

SWMU 3 **Coal Flyash Collection System**

Conclusions: This unit removes particulates from the exhaust of the facility's coal fired boilers. The potential for release to on-site soils, surface water, or ground water from this SWMU is low, due to the nature of the waste managed. This unit operates under an air emissions permit, and has not had compliance problems.

Recommendations: RAI recommends no further action for this SWMU at this time.

SWMU 4 **Shot Blast Dust Collectors**

Conclusions: This unit removes particulates generated during shot blasting operations at the facility. The potential for release to on-site soils, surface water, or ground water from this SWMU is low, due to the unit's indoor location and the nature of the waste managed. This unit operates under an air emissions permit, and has not had compliance problems.

Recommendations: RAI recommends no further action for this SWMU at this time.

SWMU 5 **Paint Sludge Satellite Accumulation Areas**

Conclusions: This SWMU manages paint sludge generated from the facility's painting operations. The potential for release to on-site soils, surface

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water, ground water, and air from this SWMU is low as the unit is located indoors.

Recommendations: RAI recommends no further action for this SWMU at this time.

SWMU 6 **Medical Waste Accumulation Area**

Conclusions: This SWMU manages medical wastes generated by the facility's in-house medical staff. The potential for release to on-site soils, surface water, ground water, and air from this SWMU is low, as the unit is located indoors.

Recommendations: RAI recommends no further action for this SWMU at this time.

SWMU 7 **PCB Waste Accumulation Area**

Conclusions: This area is used to accumulate PCB-containing waste materials (presently capacitors) prior to off-site disposal. The potential for release to on-site soils, surface water, ground water, and air from this SWMU is low, as the unit is located indoors and has adequate containment.

Recommendations: RAI recommends no further action for this SWMU at this time.

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TABLE 3

SWMU SUMMARY

SWMU	Dates of Operation	Evidence of Release[a]	Recommended Further Action
1. Resource Recovery Area	1958 to Present	Blowing incinerator ash was observed during the VSI.	Manage incinerator ash so that it does not become airborne.
2. Wastewater Treatment System	1968 to Present	None	No further action at this time.
3. Coal Flyash Collection System	1981 to Present	None[a]	No further action at this time.
4. Shot Blast Dust Collectors	1981 to Present	None[a]	No further action at this time.
5. Paint Sludge Satellite Accumulation Areas	1958 to Present	None	No further action at this time.
6. Medical Waste Accumulation Area	1958 to Present	None	No further action at this time.
7. PCB Waste Accumulation Area	1980 to Present	None	No further action at this time.

Notes:

[a] These units operate under an IEPA air emissions permit.

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Caterpillar, 1989b. Modified Closure Plan, July.

Caterpillar, 1992. Site map obtained during VSI, Figure 2, p.8

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Illinois Environmental Protection Agency (IEPA), 1981a. Letter to Caterpillar denying RCRA Part A permit application, March 26.

IEPA, 1981b. IEPA observation report of Caterpillar, March 16.

IEPA, 1985a. Compliance Inquiry Letter (CIL) regarding Closure Plan, March 6.

IEPA, 1985b. Letter to Caterpillar stating violations of 3/6/85 were resolved, July 26.

IEPA, 1985c. RCRA Inspection of Caterpillar, September 13.

IEPA, 1985d. Letter to Caterpillar stating that a 9/13/85 inspection found Caterpillar in compliance, October 1.

IEPA, 1987a. Letter to Caterpillar stating violations of 7/14/87 CIL were resolved, August 7.

IEPA, 1987b. RCRA Inspection of Caterpillar, August 20.

IEPA, 1987c. RCRA Inspection of Caterpillar, September 8.

IEPA, 1987d. Letter to Caterpillar stating violations were resolved, September 28.

IEPA, 1987e. Letter to Caterpillar stating violations of 9/30/87 were resolved, October 2.

IEPA, 1987f. Letter to Caterpillar stating violations of 10/20/87 were resolved, October 26.

IEPA, 1988. RCRA Inspection of Caterpillar, November 22.

IEPA, 1989. Letter to Caterpillar rejecting Closure Plan, June 21.

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ATTACHMENT A

EPA PRELIMINARY ASSESSMENT FORM 2070-12

EPA

POTENTIAL HAZARDOUS WASTE SITE PRELIMINARY ASSESSMENT
PART 1 - SITE INFORMATION AND ASSESSMENT

I. IDENTIFICATION

01 STATE	02 SITE NUMBER
IL	ILD 005 070 651

II. SITE NAME AND LOCATION

01 SITE NAME (Legal, common, or descriptive name of site)	02 STREET, ROUTE NO., OR SPECIFIC LOCATION IDENTIFIER				
Caterpillar Inc., Aurora Plant	Route 31				
03 CITY	04 STATE	05 ZIP CODE	06 COUNTY	07 COUNTY CODE	08 CONG DIST
Aurora	IL	60507	Kendall		

09 COORDINATES: LATITUDE 41° 43' 01" N | LONGITUDE 88° 21' 33" W

10 DIRECTIONS TO SITE *(Starting from nearest public road)*

Take Illinois Route 31 south from Aurora. Facility is located west of Illinois Route 31, south of U.S. Route 30.

III. RESPONSIBLE PARTIES

01 OWNER *(if known)*	02 STREET *(Business, mailing residential)*		
Caterpillar, Inc.	100 N.E. Adams Street		
03 CITY	04 STATE	05 ZIP CODE	06 TELEPHONE NUMBER
Peoria	IL	61629	(309) 675-1000
07 OPERATOR *(If known and different from owner)*	08 STREET *(Business, mailing, residential)*		
09 CITY	10 STATE	11 ZIP CODE	12 TELEPHONE NUMBER

13 TYPE OF OWNERSHIP *(Check one)*

■ A. PRIVATE ☐ B. FEDERAL: _____ *(Agency name)* ☐ C. STATE ☐ D. COUNTY ☐ E. MUNICIPAL

☐ F. OTHER _____ *(Specify)* ☐ G. UNKNOWN

14 OWNER/OPERATOR NOTIFICATION ON FILE *(Check all that apply)*

■ A. RCRA 3010 DATE RECEIVED: 08 / 24 / 80 (MONTH DAY YEAR) ☐ B. UNCONTROLLED WASTE SITE *(CERCLA 103 c)* DATE RECEIVED: / / (MONTH DAY YEAR) ☐ C. NONE

IV. CHARACTERIZATION OF POTENTIAL HAZARD

01 ON SITE INSPECTION

■ YES DATE 07 / 07 / 92
☐ NO

BY *(Check all that apply)*

☐ A. EPA ■ B. EPA CONTRACTOR ☐ C. STATE ☐ D. OTHER CONTRACTOR
☐ E. LOCAL HEALTH OFFICIAL ☐ F. OTHER: _____ *(Specify)*

CONTRACTOR NAME(S): Resource Applications, Inc.

02 SITE STATUS *(Check one)*

■ A. ACTIVE ☐ B. INACTIVE ☐ C. UNKNOWN

03 YEARS OF OPERATION

1958 (BEGINNING YEAR) | Present (ENDING YEAR) ☐ UNKNOWN

04 DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT, KNOWN, OR ALLEGED

Solvent- and water-based paints, diesel fuel, gasoline, coal, coal flyash, iron phosphate sludge, oils, caustic paint stripper, iron, steel, ash from nonhazardous combustible materials, medical wastes, and shot blast dust.

05 DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT AND/OR POPULATION

Some of the nonhazardous ash from incinerating nonhazardous combustible materials was blowing around in SWMU 1

V. PRIORITY ASSESSMENT

01 PRIORITY FOR INSPECTION *(Check one. If high or medium is checked, complete Part 2 - Waste Information and Part 3 - Description of Hazardous Conditions and Incidents.)*

☐ A. HIGH *(Inspection required promptly)* ☐ B. MEDIUM *(Inspection required)* ■ C. LOW *(Inspect on time-available basis)* ☐ D. NONE *(No further action needed; complete current disposition form)*

VI. INFORMATION AVAILABLE FROM

01 CONTACT	02 OF *(Agency/Organization)*			03 TELEPHONE NUMBER
Kevin Pierard	EPA Region V			(312) 886-4448
04 PERSON RESPONSIBLE FOR ASSESSMENT	05 AGENCY	06 ORGANIZATION	07 TELEPHONE NUMBER	08 DATE
William Earle		Resource Applications, Inc	(312) 332-2230	2 / 19 / 93 (MONTH DAY YEAR)

ATTACHMENT B

VISUAL SITE INSPECTION SUMMARY AND PHOTOGRAPHS

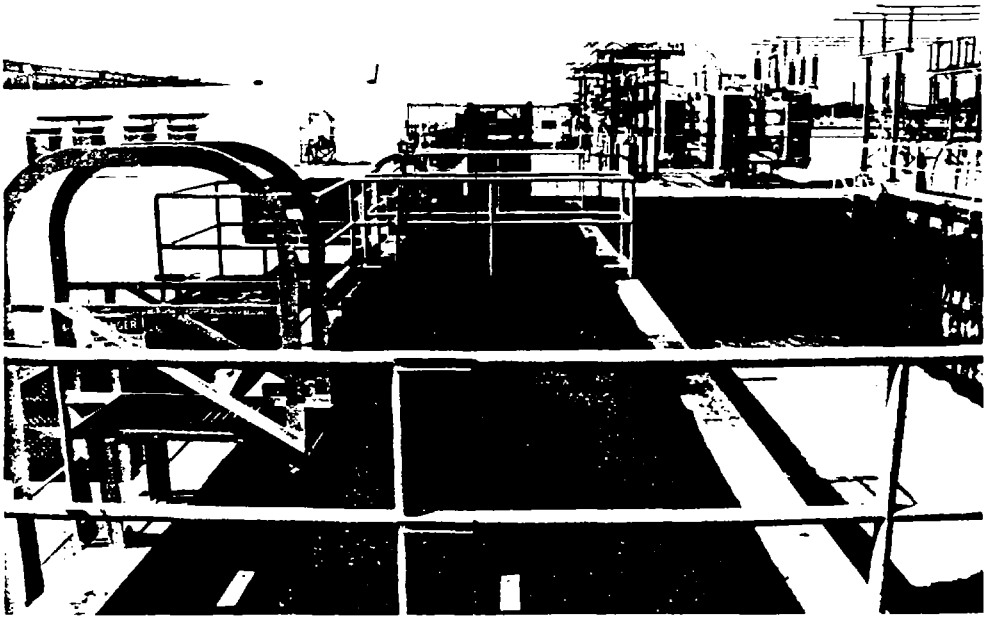
VISUAL SITE INSPECTION SUMMARY

Caterpillar, Inc., Aurora Plant
Route 31
Montgomery, Illinois
ILD 005 070 651

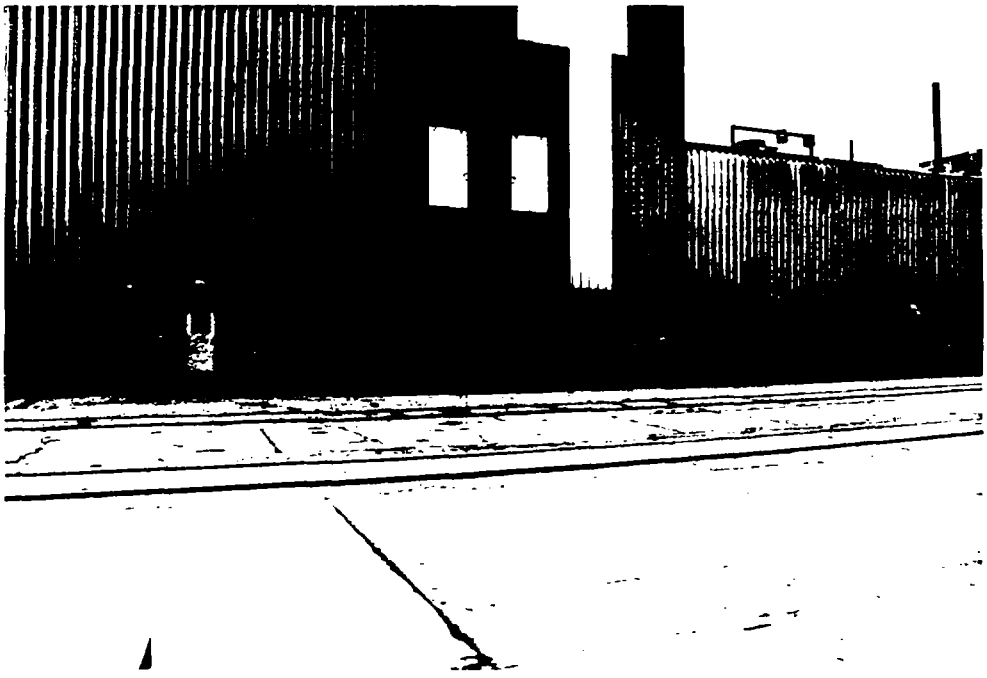
Date:	July 7, 1992
Primary Facility Representative: Representative Telephone No.:	Ann Hastert, Environmental Coordinator (708) 859-5417
Inspection Team:	Jeff Indeck, Resource Applications, Inc. (RAI) William Earle, RAI
Photographer:	William Earle
Weather Conditions:	Rainy, temperature about 80°F
Summary of Activities:	The visual site inspection (VSI) began at 9:10 a.m. with an introductory meeting. The inspection team explained the purpose of the VSI and the agenda for the visit. Facility representatives then discussed the facility's past and current operations, solid wastes generated, and release history. Facility representatives provided the inspection team with copies of requested documents. The VSI tour began at 2:20 p.m. Photographs of all SWMUs were taken. The tour concluded at 4:45 p.m., after which the inspection team held an exit meeting with facility representatives. The VSI was completed and the inspection team left the facility at 5:00 p.m.

Photograph No. 1 Location: SWMU 1
Orientation: East Date: 7/7/92
Description: This is the drummed waste storage (and hazardous waste storage) area of the Resource Recovery Area (SWMU 1). Hazardous wastes are stored for less than 90 days.

Photograph No. 2 Location: SWMU 1
Orientation: Northwest Date: 7/7/92
Description: This is the bulk waste accumulation section of the Resource Recovery Area (SWMU 1)



Photograph No. 3 Location: SWMU 2
Orientation: North Date: 7/7/92
Description: This is the API separator. One of three 10,000-gallon holding tanks is on the left.



Photograph No. 4 Location: SWMU 3
Orientation: West Date: 7/7/92
Description: This is the coal flyash dumpster, which is located outside and below the Coal Flyash Collection System.

Photograph No. 5 Location: SWMU 4
Orientation: South Date: 7/7/92
Description: This is one of shot blast units and associated Shot Blast Dust Collector (with hose running down to drum).

Photograph No. 6 Location: SWMU 5
Orientation: West Date: 7/7/92
Description: This is one of the Paint Sludge Satellite Accumulation Areas (in blue) where the paint waste is accumulated. All drums present are unused product (paint). No paint waste was present at the time the picture was taken.

Photograph No. 7 Location: SWMU 6
Orientation: West Date: 7/7/92
Description: This is the Medical Waste Accumulation Area.

Photograph No. 8 Location: SWMU 7
Orientation: North Date: 7/7/92
Description: This is the PCB Waste Accumulation Area. The left drum is empty. The right drum has a few capacitors, which are stored with oil and grease absorbent.

ATTACHMENT C
VISUAL SITE INSPECTION FIELD NOTES

7/7/92 RAINY 70°, 9:15 ANN HASTERT ENV. COORD.

FACILITY CONST. IN 57. OCCUPIED IN 58
BLDG B IS ORIG. C - 60s - WAREHOUSE
68 - WWT OUT BLDGS G, H - 60s, K - 80
FARMLAND. CAT BUILT ALL BLDGS.
CAT TRACTOR < 10 YR. CORP CHANGE CAT, INC.
4.9 M SQ FT UNDER ROOF.
BLDG C ADDED SPACE. WILL BE SOLD THIS WK
BLDG C +/- 13 ACRES.

N OF FACIL (N OF C) IS BASELINE
CAT OWNS W OF C TO ROAD
DALY TRUCK & KEENE TRUCKING & SMALL BUS.
GARAGE, LANDSCAPE, FOODS ETC
N OF BASELINE; RES & STRIP MALL
N OF 30 IS APTS.
W IS FARMLANDS AND FARM IS OCCUPIED
S IS FARMLAND
E IS RAILROAD
NICHOLSON GRADE SCHOOL IN MONTGOMERY
COPLEY MEM HOSP. IN AURORA.
KENDALL COUNTY S OF 30
OSWEGO TSP.
CAT OWN FARM W & N OF C

MAILING: BOX 348
AURORA 60507

FACILITY: RTE 31

CAT IS OWNER AND OPERATOR.
3 WELLS ON PROP. 1 IS CURRENTLY UNDER REPAIR
IS WELLHOUSE 1.
PROVIDE ALL WATER. NO MUNI WATER.
WELLS ARE #1 1384'
#2 1346
#3 1352
111,000,000 g/YR. MONITORED DAILY/TEST QTR.
CBC - OUTSIDE LAB SAMPLES WATER. NO PROBS.
FLOW IS N → S. IN LG AQUIFER.
NO OTHER FACIL IN SAME AQUIFER.
MOST RESEDENCES ARE SHALLOWS.
MANY SURROUND FARMS
OSWEGO & MONT ⊂ MUNI WATER.
MAYBE DEEP WELLS.
FOX RIVER +/- 0.5 mi TO E.R.
STORM TO RIVER TO CASCADE. UNDERGROUND
⊂ DIKES TO PREVENT RELEASE
NO NPDES AT PRESENT. WILL HAVE STORM IN FALL.
SURFACE: BOTH ABOVE & UNDERGROUND.

SOME SURFACE TO PRETREAT.
TRAIL FARM, OUTSIDE STORE, RELCAIN AREA
GOES TO PRE TREAT. NOT A POINT SOURCE
PRETREAT ONLY INDUSTRIAL. 200,K / DAY
COMBINES WITH SAN TO SAN DIST ACROSS STREET
DOES NOT GO TO RIVER DISCHARGE.
IWNT "WET WELL" IS SUMP - DOESN'T OVERLOAD SYSTEM
IMPROVES SEPARATOR FUNCTIONS.
DRAIN DITCHES AROUND CONCRETE ON S. FACIL
AS OPEN SEWER.
SAN CONNECTS W/ IWW AFTER R.
FACILITY FENCED. GATES CLOSED DURING NONOP.
OWN SECURITY 24-HRS ALL DAYS.
CARD ACCESS FOR BLDGS THAT ARE LOCK
2 MAIN SHIFTS 3RD SHIFT IS LIGHT.
7 DAYS A WEEK
3300 EMPLOY 2200 HR REST SALARIED.
MOST ON DAY SHIFT, 2ND REDUCED 3RD SMALL

OUTSIDE SPILL H_2O BASE PAINT. SEV YRS AGO
DIRT REMOVE
L R Q
HOLE IN BLDG. PART DRIPPED PAIN

FALL 91 DUMP DYE TO AAO
PUMP STATION OVERFLOW. MAY GO TO STORM
NO NOTICEABLE.

84

AND SINCE 1981

NO EVIDECE OF RELEASE.
DYED WWT. CALLED IEPA.
CAUTIONARY RESPONSE.
IEPA DIDN'T REQUIRE BECAUSE < RQ.
NO INCIDENT NUMBER.
DURING NIGHT RAINSTORM. NOT on BOOMS.

ALL SPILLS CAUSE IMPLEMENT OF C.P.
SOMETIMES PARK LOT OIL TO CASCADE.
NOTHING ELSE OFF SITE.
MAYBE DITCH AREA. REST OF SITE on CONCRETE

ACIDS, OILS
SPILL MATERIALS. TRUCK. SECURITY ALSO.
HAS ABSORB. CRIBS on SITE.
DRI RITE, TYVEK.
USUALLY WITHIN BLDGS. / LONG TIME AGO
SPILL H_2O BASE PAINT. SEWER COVERED.
SUCKED TO TRUCK. SPILL STOP & SAND.
CLEAN UP TO AAO.
VAN FOR CROSS TO CASCADE. CHECKED DAILY.
BOOMS MONITORED.

COMPLIANCE SIGNS & LABELS.
STORE AREA W/ HAZ & NON HAZ.
SAME AREA WHEN PLANT STARTED
RESOURCE RECOVERY - ONLY ONE USE
DRAIN TO AAO. CONCRETE SLOPES TO AREA
1" RAIN = 100 K GAL H2O TO TREAT.

BERM S. OF FACIL FOR NOISE
BLACKBERRY CK BY ORCH RD. NO FLOW
NO ENDAG OR WETLANDS.
NO FLOOD EXCEPT IF LIFT STATION
LIFT STATIONS TO WWT. LIFT TO SANITARY.
SUMPS AT ALL LIFT STATIONS.
A HOW MANY?

BUILDING B. FABRIC & ASSEMBLY
HEAT TREAT - QUENCH OILS.
INDIV. MACH. PUMP OUT
COOL, HYDRAULICS, CLEANER NO VAP DEG
NO PRAT., SMALL PAINT, WELD, SHOT BLAST
FABRICATES PARTS

BLDG G - WELD, PRESS COOLANT
MACHINE - COOLS & OILS
CLEAN - CAUSTIC CLEAN.
PAINT - FLOW COAT
LG SYSTEM & PUMPS & DRAINS. DRAIN TO AAO.

BLDG H - ASSEMBLY. LARGE/MED WHEEL LOAD
EXCAV COMPACTOR
PAINT. SPECIAL COLOR = SAA.
FILL & PRIME PROD OILS, ANTI FREEZE
NO MACHINING OR WELDING.
NOT MUCH WASTE. CLEAN OUT ONLY - ANNUAL

BLDG K - SMALL
POWDER PAINT - NO WASTE
WASH - CAUSTIC → AAO
NO COOLANTS.

UTIL BLDG - BUILDING N.
COAL FLY ASH
CHEMS FOR BOILER TREAT - ALIDS/TSACES

INCIN - BOILER 9, 10 in Y-16
WASTE HEAT BOILER
NOW USED AS INCIN. 1.5 SHIFTS
YIELDS ASH.

R = WWT
SKIM OILS - SELL TO RECLAIM
SLUDGE OFF BOTTOM
CHEMS FOR TREAT

2 TANK FARMS. WWT & BY BLDG H.
STORE FUEL OILS, PRODUCTS.
2 UST - GAS & DIESEL. IN TF 1
AST - OILS, COOL, ANTIFREEZE.
NO TANK WASTE STORE. MAY BE ON PART A
NONE EVER USED.
NO TANK ASSIGNED FOR WASTE.

BLDG C - PURCHASED FINISHED PRODUCTS WAREHOUSE
ELEC CHIP / PARTS ETC. AUTO AREA
FORK SERVICE. NO ASBESTOS, OR PCB
CLEAN BLDG.

PROCESS IN F NOW IN K.
1 MI NORTH.
5,000 g H_2O TO AAO HERE.
PERMIT TO MOVE
SMALL PAINT SYSTEM H_2O - BASE
SM CLEAN SYST

PROP SOLD 1987. SOLAN & MURPHY. LEASED?
S & M IS REALTY.

MEDICAL

SAA in Bldg H. NOT OUTSIDE AS 90 RCRA Insp
FACILITY REGULATED AS GENERATOR
5,000 GAL H_2O SYSTEM. CAUSTIC & ALIA WASH.
WAS USUALLY NEUTRAL BY TANK.
PROCESS - 5-STAGE WASH, PROCESS TANKS
MOVED SEPARATE.
Bldg F TANK STEEL. ~~UAK UOC~~ 5K gals
FUEL OIL UST - STEEL - FOR BOILERS ~~UAK~~ 15,000 gals
MAY STILL BE THERE.
DID HAVE ASBESTOS.
REMOVAL OF H_2O 3-4x/DAY. & VACUUM TO TRUCK
PUT INTO RECOVERY AREA DRAIN TO EAGE SYSTEM
Bldg F BOUGHT. ~~Gm~~ MFG FACIL PRIOR. 1978?
SOLD 1987.

FAB: Milling, Drilling, MACHINING TO SHAPE
WELDING, HEAT TREAT.
CHIP TUB TO RRA - SORTED BY CONSTITUENT
STEEL & ALUM TO FOUNDRY & SCRAP DEALER
2 CY HOPPER. FORKED TO RRA.
END OF LINE 6 CY TO RRA
TO BIN TO RR CARS. to MARLETON FNDRY
QUENCH OIL - MAKE UP. CLOSED SYSTEM
PUMP out & RECOVERY & Reclaim
EXHAUSTED WITH USE

SEMI ANNUAL FURLOUGH - 2 WK SUMMER
1 WK CHRISTMAS

COOLANTS TO TRUCK. PERIOD AS NEEDED WK-2 WKS.
TO DRAIN IN BLDG B TO AAO.
ALL COOLANTS TO AAO.
~~PARTIALLY~~ ALL WATER-BASED COOLANTS.
NO STORAGE OF COOLANTS AS WASTE
HYDRAULICS TO AAO. OILS TO DRUM & SKIM OIL
NO OIL RECLAIM AT FACILITY.
CLEANING SOLUTION - PUMPED TO AAO.
SUMP SUCKER. TO DRAIN.
B- DRY PAINT BOOTH. FILTER TO H_2O TRASH PAINT
CLEAN 6 WKS - DRUMMED OFF SITE STORE IN RRA
SOLVENT NOT CLEANER
CONTROL WASTE DIV OF CWM IN MENOMONEE WI
CLOSED SYSTEM RECIRCULATE PAINT.
DRUMS TO RRA IMMED. NOT STORE AT AREA.
WELD SMOKE EXTRACTOR. DUST. GOES TO
ROLL OFF. SMALL AMT +/- 3 MOS.
NOT HAZ. < 1 DRUM/YR. TO LANDFILL
SMALL BAGHOUSE-LIKE DEVICE. NOT AS SPEC. WASTE
IN DRUM NOW. SUMMER 91 1GAL/3 MOS
SHOT BLASTER - DRUM WASTE → CONTROL WASTE W/
6 DRUMS/MO. RECYC TILL WASTE → DRUM TO
RRA. DRUM NOT MANAGE IN AREA
< 1/2 FULL DRUM
SINCE DAY 1.

BLDG G - COOLANTS & OILS TO AAO.
PRIMER - WATER BASE PAINT (FLOW COAT)
SPRAY OP - NOT H_2O - HAS SOME SOLVENT
PAINT STRIPPER - CAUSTIC STRIPPER
1 BATH - CLEANED SAME TIME AS PAINT
+/- 6 DRUMS. NaOH - PAGED COMMERCIAL SOLN
CLEANED +/- 6 WEEKS BUT NOT EVERY TIME
STRIPS HOOKS & CHAINS.
SOLUTION IS REUSED. SOLIDS REMOVED TO 55-g
SOLUTION → OUT - SOLIDS AWAY DRUM → SOLN BACK.
DRUMS IMMED TO RRA
LARGE MACHINES DRAIN TO AAO. +/- 3 YRS
H. MAY HAVE SAA NEAR PAINT BOOTH.
1 55-G DRUM CLEAN GUNS FROM HAND SPRAY BOOTH
SOLVENT OR PAINT EXCESS.
FILTERS TO H_2O TO ↓ COMBUST
PRODUCTS ONLY 1 SHIFT WORTH.
PRODUCT FLUIDS FROM FILLING LINES TO PIPES TO TANKS

POWDER PAINT - BLDG K
FILTER - UNK
LINES DRAIN TO AAO

COAL FLY ASH - BOILERS - DIRECT TO 20 CY ROLLOFF
GRT LAKES TO CDT TO JOLIET
ALWAYS IN ROLL OFF

SULFURIC ACID, LIME AS SOFTENER PRIOR TO BOILERS
BOILER BLOWDOWN TO AAO.

INCIN YIELD ASH IN PILE. PILE IN REC AREA.
INCIN IN REC AREA. ASH ON CONCRETE.
1981

WWT - 1968 - DAF ADD SHORTLY AFTER.
DISCHARGE UNDER LOCAN
Zn/Mo - LOOK AT BOD, COD, pH, METAL
PAST Zn EXCURSIONS. SINCE RELOCATE TO R
ON REG BASIS NO PROB.
SKIM OIL TO BULK TANK 5,000 g Concrete.
REMOVED BY METALWORKING
PIPED TO TANK. 1 TANK / WK or 1.5 WK.
SLUDGE TO TUB BY CONVEYOR. TUBS TO TANK
AT END OF SYSTEM. TANK ALSO HOLDS DAF
SLUDGE. PIPE BY GRAVITY.
10 K g / WEEK 2 x 30,000 g TANK.
CONCRETE. Not lined, SEALED. 8" THICK.
SAME AS OIL TANK
CHECK PH + EMULSION BREAKER - ADDED POST SEP.
ADJUST AS NEED.

BLDG C - AUTO. NOW IN GBH. MAIN IS "X" STORAGE
MAIN X - MAIN WORK. RECHARGED

NO OTHER BLDG C WASTES

BLDG F WAS SEPARATE NUMBER. STRICTLY A GENERATOR. PROP GOLD. NOT OCCUPIED BY CAT

TANK FARMS.
USTs TANK FARM 1 BY BLDG R.

NO PCBs in Q. STORE AREA FOR CAPACITOR FROM MACHINE. STORE in Q. NOT in TRANSFORMERS.

USTs D-W w/ MONITOR & ALARM.
STEEL. TANK FARM 1 12K-15K 6
TF 2 STEEL - ALL AST.

MEDICAL
SHARPS / BANDAGE
MANAGE AS MEDICAL WAST
BF1 INCIN - UNKOWN DETAILS

NO COMPLAINTS NOISE & CAUSE OF BERM.

CHIP TURNING DUMPSTER. MACHINE OPS IN B
COATED W SEMI SYNTH COOLANT. SOME DRAG OUT
COOLANT IS BY INDIV MACHINE. RECIRCULATED.
HOPPER SINCE 50s. WILL GO TO LG AT LINE
END. WOOD BLOCK FLOOR. COATED W/ ASPHALT

PIPING IS ASBESTOS INSULATED. O & M PLAN.
CONTRACTORS FOR ASBESTOS REMOVAL.

CHIP DUMPSTER AT END OF LINE. RECEIVES METAL FROM
INDIV. MACHINES. MINOR SCRAPS OIL ON FLOOR BRICK
CONCRETE LINED WITH METAL FOR BAGS IN HOLDING
DUMPSTER

QUENCH OIL IS CLOSED CIRCULATION SYSTEM. LOSS IS
ONLY INCIDENTAL LOSS DURING PROCESS. NO WASTE -
UNLESS EPISODIC DRAINING OF SYSTEM. THEN
PUMPED DIRECT TO TANKER FOR TRANSPORT TO
RECYCLER. TANK IS UP TO 30 K g. NO FILTERS
ON SLUDGE. STEEL LINED TANK. INSIDE CONCRETE

SEPARATE BURNABLE RUBBISH STORED IN DUMPSTER
WILL GO TO INCINERATOR.

SHOT BLAST. MATERIAL VACUUMED TO DRUM.
DRUM TO RECLAMATION AREA. LANDFILLED BY
CONTROLLED WASTE - CWM in WISCONSIN.
SINCE 50s. SHOT BLAST ON FLOOR WILL BE
SWEPT & PLACED IN BARREL. AREA COVERED W/
WOOD AND CARPET TO CONTROL SLIPPING. DRUM IS
55 g. SITS IN TUB. DUCT INTO DRUM DIRECT.

DRUMMED PRODUCT STORAGE. PALLETIZED. CLEAN.

AUTOMOTIVE in BLDG X. FIXTURE STORE.
HOOKED TO AAO. LIQUIDS TO DRAIN.

DRY PAINT SYSTEM - BLDG G.
AIR PULLS PAINT THRU FLOOR FILTERS. LOW WASTE
FILTERS INTO WATER TO ↓ COMBUSTION.
WASH SPRAY TO AAO. MANUAL SPRAY.
WITH CAUSTIC TO CLEAN. GOES TO AAO in
FLOOR TRENCH. PAINT SINCE 1968.

COAT SYSTEM G

CAUSTIC WASH → FLOW COATER → HEAT OVEN
FLOW coater is continuous PAINT SYSTEM.
CAUSTIC WASH → PAINT → BAKE OVEN

PAINT STRIPPER IN BLDG G AT SW CORNER.
REMOVE PAINT FROM HOOKS AND CHAINS. DIP
TANK. VENTS TO OUTSIDE. HAS 8" CEMENT
BERM AROUND. USE SINCE '68. NO RELEASES
BERM IS SMASHED DUE TO ABRASION. WON'T CONTAIN
VOLUME. LIQUID TO ADJACENT TANK. SHOVEL
SLUDGE TO DRUMS. TO RECLAIM. D002 CORROSIVE.
SODIUM HYDROXIDE. DRAIN IN CONTAIN TO AAO.
VOL? TWO TANKS. 1SM 1 LG. STEEL TANKS.
LOOKS CLEAN. NO FILTER ON VENT.

ALL FLOOR DRAINS TO AAO.
WASHER TO AAO.

HAD H_2O-BASE PAINT SPILL. A COUPLE OF YRS AGO
85-86. NEEDED SPILL # TO REMOVE SOIL. 5 YDS
REMOVED. WENT TO SETTLER'S HILL IN BATAVIA.
WERE DIGGING HOLE NEXT TO AUTOMATED LINE IN
BLDG G. PART DRIPPED INTO OPEN HOLE. H_2O BASE
PAINT. NO POST REMOVAL TEST. VOL WAS 1 PINT.
PAINT TACKY - not LIQUID. EASY TO SEE & REMOVE.

BUILDING G FUME EXTRACTOR. PUT IN LAST SUMMER. UNK. ANAL. GOES INTO 1 GAL BAG AS DUST. MOST GETTING RID AS INDUST. WASTE. NOT MUCH VOLS. SEVERAL HOOKED TO ARC WELDER. VACUUMS INTO BAG. IS FORIT. IS PVC PIPE & FLEX PIPE TO WELD ARM. PRIOR TO SYSTEM, VENT TO AIR.

FAC HAS DONE AIR STUDIES. NO PROBLEMS. MAY BE NEW REG.

MEDICAL WASTE.
RED BAGGED BIO HAZARD. TAKEN TO BLDG B.
TRUCK PICK UP 1x/mo.
SHARPS IN SHARPS CONTAINER.
MANAGED IN WASTE BASKET.
56/68 MEDICAL AREA

BUILDING H. PART-TIME SAA NEXT TO PAINT BOOTH
SOLVENT BASED PAINT. ONLY FILTERS.
DRUM LABELED WASTE. NONE (WASTE) OVERHEAD UST.
PRODUCT DRUMS. '68 DATE. NO SPILLS.
NO SEPARATE MARKED AREA
DON'T USUALLY HAVE SAA, ONLY IF CHANGE COLORS OR ANNUAL
ASSEMBLY IN H. NO WASTE PAINT IS IR cured.

INCINERATOR - FROM Y-16 TO OPEN CEMENT PAD.
AREA IS SLOPED & DRAINS TO AAO. IS ALL
FENCED IN AS RECLAMATION AREA.
GOES TO ENVIROTEM in MORRIS BY 20 CY ROLLOFF
MOVED BY WHEEL LOADER.

SCRAP - STORED on CEMENT. In BINS. LOADED TO RR
CARS BY CRANE. RR TRACK ADJACENT. BINS TO AAO
FAIRLY CLEAN.

EMPTIES (55-G) PLASTIC DRUMS WAIT FOR VENDOR
CEMENT IS 12" THICK

WHOLE AREA IS FENCED SEPARATE FROM
PERIMETER.

DRUM STORAGE. OLD - FORMAL CLOSURE. D001 & D002
DATES 7/6 6/86.
AREA TO AAO. STORED SINCE 1956. SIZE OF AREA?
34 x 60. REMARKABLY CLEAN. DRUM
No Release. One leak. OVERPACKED. NO CHAR WASTE

SOME BLOWING DUST FROM INCIN ASH.

14,000 CU YDS INC

TFARM 1- 2 FIBER 12,000 UST. OLD STEEL.
NO RELEASE. DRAINS TO AAO.
— UNDERGROUND PIPES & HEATER
WET WELL TO PUMP TO HOLDING.
WET WELL IS CEMENT. VOL 10K gals
ADD POLYMER. USED TO ADD ALUM (Al SULFATE)
SODA ASH & SULFURIC FOR pH ADJUST.

API SEPARATOR. TOP TO HOLD TANK.
CONVEYOR TO METAL SLUDGE CONTAINERS.
WATER TO 1x3 100K gal HOLD TANK
OIL HOLD PUMPED TO TANKER TO
METALWORK LUBRICANTS IN INDIANAPOLIS.
KEPT SEP FROM BOTTOM
BOTTOM TO 2 cy WAT TIGHT HOPPERS.
TO ML BUT KEPT SEP.
12" CEMENT. CLEANED & INSPECTED.
SLUDGE TANK 2x 30 K

DAF SLUDGE & FLOAT TO SLUDGE PIT.
VERY CLEAN GOOD REPAIR
THEN TO MUNI

2 WASTE HEAT BOILER. In in S1
PAPER CARDBOARD PLASTIC WOOD.
UNK RELEASE CONTROL on STACK.
FLOOR TO AAO. VOL IS 14000 CY ASH
+/- 1011 14000 CU WASTE. 1000 CY ASH / mo.
SHREDDER & CONVEYOR TO Pile. LOADER SHOVELS
IN LOAD. CYCLE 1/7 minutes.
FLOOR VERY CLEAN.

20 CY Roll off. FLY ASH: TO CDT & Joliet
3,000 YDS.
BAGHOUSE - Contractor changes. Start in
1981. BOILERS SO LOWER KY SULF COAL.
NO SCRUBBER. USE LOW SULF COAL.

BLDG Q - N OF R - N WALL. DRUM STORE FOR
PCB CAPACITOR. PUT IN DRUM & OIL DRY.
A FEW CAPACITORS / DRUM / YR.
IS 10' x 3'. ONE EMPTY DRUM. 1 FILLING DRUM
STEEL EPOXY PAINT COATED BIN. 8" HIGH. LABELLED.
Clean. NO RELEASES. PRE - 80 USE.
DRAIN TO AAO. IS TRANSFORMER BUILDING
BUT NO PCB.

FORMER WASTE - LIME SLURRY. SPECIAL.
BOILER WATER TREAT. NOW to AAO.
HEAT TREAT SMALL oil FIRES - CO_2 SYSTEM:
SHUTS DOWN SYSTEM.
NO OPEN BURNING.
ACCIDENTS - NO MAJOR.

Medical in "B" BFI RED BAGS
BRINE BOXES, BAGS, SHARPS.
INCINERATION. 1/mo.
BUILDING 6 → BUILD B.
BANDAGES. ANY TYPE OF BODY FLUIDS.
PHYSICAL, DRUG SCREEN. FIRST AID.
WILL START SALARIED.