APR 01 1985

5HS-12

CERTIFIED MAIL #P 557 099 138
RETURN RECEIPT REQUESTED

Dale Bennington, Environmental Engineer
Keystone Group - Bartonville Plant
7000 South Adams Street
Peoria, Illinois 61641

RE: Part B Permit Application Call-In
Keystone Group - Bartonville Plant
7000 South Adams Street
Peoria, Illinois 61641
ILD 000 714 881

Dear Mr. Bennington:

Previously, you should have received an acknowledgement of our receipt of the Part A permit application material for the above-referenced hazardous waste facility under the Resource Conservation and Recovery Act (RCRA) permit program. Accordingly, this letter constitutes the next step in the formal process leading toward issuance or denial of a RCRA permit. Under the authority of 40 CFR 270.10, this is a formal request for submittal of Part B of the permit application for the above referenced facility.

Also, this letter is to inform you that on November 8, 1984, the Hazardous and Solid Waste Amendments of 1984 (HSWA) were signed into law. This new law amends RCRA, and contains many provisions which may affect your facility. One important provision mandates that interim status for land disposal facilities shall terminate on November 8, 1985, unless the Part B permit application and a certification of compliance with 40 CFR Part 265 Subpart F and H requirements is submitted by November 8, 1985. Enclosed are copies of the HSWA provisions and a HSWA guidance document for selected issues related to permit applications for land treatment, storage and disposal facilities.

Enclosed is a copy of 40 CFR 270.14, which lists the items required for submitting the Part B permit application for the facility (regulations promulgated prior to the enactment of HSWA). The Part B application must be submitted in quadruplicate and postmarked no later than October 15, 1985. The original and one copy of the application must be sent to the United States Environmental Protection Agency (U.S. EPA). The other two copies must be sent to the Illinois Environmental Protection Agency (IEPA). Please uniquely number each page of the application including all attachments (maps, specifications, etc.). A certification statement identical to the one stated in 40 CFR 270.11(d) must

accompany each application and all additional submittals. Send your application to the following addresses:

RCRA ACTIVITIES Part B Permit Application U.S. EPA, Region V P.O. Box A3587 Chicago, Illinois 60690-3587	Permit Section Division of Land Pollution Control Illinois Environmental Protection Agency 2200 North Churchill Road Springfield, Illinois 62706

We are committed to conducting the RCRA permitting process as efficiently as possible. Consequently, I suggest you contact Horst Witschonke of my staff, at (312) 886-0987, as you begin preparing your application. Mr. Witschonke will be available to discuss specific needs of your application or to meet with you in Chicago. These efforts are intended to generate complete applications, without requiring any information beyond that which is necessary to make RCRA permit decisions.

Failure to furnish the complete Part B permit application by the above date, and to provide in full all required information, is grounds for termination of interim status under 40 CFR 270.10.

Information in the Part B permit application can be disclosed to the public, according to the Freedom of Information Act and U.S. EPA Freedom of Information regulations. If you wish, however, you may assert a claim of business confidentiality by printing the word "Confidential" on each page of the application which you believe contains confidential business information. All incoming materials containing confidential business information should be sent in a double envelope--one envelope inside the other. The inner envelope is to be addressed to the Docket Control Officer (DCO) with the following instructions: "to be opened only by the DCO."

U.S. EPA will review business confidentiality claims under regulations in 40 CFR Part 2, and may later request substantiation of such claims. Please review these rules carefully before making a claim. If you claim parts of your application as confidential, please provide us with a public information copy of the application. The public information copy must be identical to the full application with the exclusion of the confidential information.

We have also enclosed a copy of 40 CFR Part 264, (regulations promulgated prior to the enactment of HSWA) which includes technical standards for the operation of treatment, storage, and disposal facilities. These standards will become applicable to your facility upon issuance of a RCRA permit by U.S. EPA. A copy of our "Guidance For Permit Application Preparation" and "Part B Completeness Checklist" are also enclosed; they will help you in preparing a comprehensive and complete permit application.

Also enclosed is a "Certification Regarding Potential Releases from Solid Waste Management Units" which will help you address the requirements of HSWA Section 206 concerning continuing releases at permitted facilities.

We will coordinate review of the application with the IEPA, and will strive for the simultaneous issuance of Federal and State hazardous waste facility permits. It is possible that during the processing of the application, the State hazardous waste program may become authorized to issue RCRA permits for your type of facility. In that case, direct Federal processing will cease, and IEPA in lieu of U.S. EPA will make the final determination on your permit application.

Within 90 days after this formal request for Part B of the permit application for the facility, representatives from U.S. EPA and/or IEPA are planning to conduct a pre-permit facility inspection. The inspection will be coordinated with you ahead of time, so that we can work together for a clear understanding of the permit application and compliance requirements. Your early familiarity with requirements of the Part B permit application should result in time savings for your facility and preparation of a higher quality permit application.

We look forward to working with you.

Sincerely yours,

Karl J. Klepitsch, Jr.
Chief, Solid Waste Branch

Enclosures: 40 CFR 270 (applicable parts)
40 CFR 264 (applicable parts)
Guidance For Permit Application Preparation
Part B Completeness Checklist
Guidance on Early Enactment Provisions of HSWA
Certification Regarding Potential Releases From Solid Waste Management Units

cc: Larry Eastep, IEPA

bcc: Part A File
Ken Burch, GMCU

5HS-12/H.Witschonke:cm:3-27-85

INITIALS	CWL					CWL 3-28-85	
DATE	3-28-85	3/28/85	3/28/85			3/29/85	3/29/85

DATE

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

MEMORANDUM

DATE: August 19, 1983

TO: Land Division File

FROM: David C. Jansen, DLPC/FOS-Central Region
DCJ

SUBJECT: LPC #1430050l - PEORIA COUNTY - BARTONVILLE/KEYSTONE STEEL & WIRE

Keystone's original Part A application of November 14, 1980, included the following processes and described the following wastes:

S03 - Waste pile storage of K061

D80 - Landfill for K061

T02 - Surface impoundment treatment of K063

D83 - Surface impoundment disposal of K063

T04 - (Other) Wastewater treatment plant for K062

Waste 1,1,1-trichloroethane is also generated at a rate exceeding 1,000 Kg/month. This waste is stored for less than 90 days prior to shipping it off-site under IEPA Special Waste Permits #921852 and #812241 (see photo #14 of storage area).

In 6/28/82 and 10/11/82 letters to the USEPA (attachments A and B), Keystone requested the withdrawal of its Part A, claiming it was only a generator. Based on the information Keystone submitted, the USEPA, in a 2/15/83 letter (attachment C), granted Keystone's request.

The USEPA also granted Keystone a temporary exclusion from the hazardous waste list for sludge generated from the lime treatment of spent pickle liquor. This waste was formerly listed as K063. Although this waste was delisted (on 11/12/80) before the exclusion was granted, the waste was still defined as hazardous pursuant to 721.103(c)(2). To obtain the exclusion Keystone demonstrated the waste did not have any characteristics of hazardous waste. The granting of Keystone's exclusion was published in the 8/6/81 CFR (attachment D).

With the exclusion, Keystone's Part A notification for surface impoundment treatment and disposal (T02 and D83) of K063 sludge was no longer necessary.

Keystone's notification for waste pile storage and landfill disposal of K061 was precautionary. Since at least November 19, 1980, Keystone has been shipping arc dust to the Peoria Disposal Company landfill for disposal on a daily basis, under IEPA Special Waste Permit #790213.

LPC #14300501 - Peoria County
Bartonville/Keystone Steel & Wire
August 19, 1983

The final process Keystone described on its Part A was T04. In this process Keystone pumps approximately 10,000 gallons of waste pickle liquor (K062) per day, along with other plant waste streams, to their NPDES permitted wastewater treatment plant (see attachment E). The other plant waste streams include storm water, cooling water, boiler blowdown, and wastes from wire coating operations. Coating operations include sodium hydroxide solutions for degreasing and etching, flash hydrochloric acid contact, and hot dip galvanizing operations. Mr. Bennington said waste from the galvanizing operation would likely be contaminated with high levels of lead.

The spent pickle liquor, with the other plant waste streams, are collected by the plant sewer system and continuously discharged from a pipeline to a ditch (see photo #8). The ditch empties to a holding pond (see photos #9 and #10), which is interconnected with another pond (see photo #12). Sediment that had accumulated in these ponds was dredged out in 1982 and dumped just west of the ponds (see photo #11). The sediment was an orange brown, fine grained, and soft underfoot. Wastewater in the southernmost holding pond (see photo #12) is pumped through a mixing chamber where it mixes with river water, and discharged through a fountain to an earthen aeration or equalization basin (see background of photos #2 and #3). The river water provides dilution and some neutralization. Samples of river water, the aeration basin, the sludge lagoons, and the pickle liquor waste where it enters the mixing chamber were tested for iron, lead, and zinc (see attachment F). Mr. Bennington said no sludge has ever been removed from the aeration basin. Wastewater from this impoundment is pumped to a neutralization tank (see right corner of photo #2) where lime and coagulant are added. The neutralized wastewater flows to concrete sedimentation basins (see right center of photos #2 and #3). Sludge from these basins is pumped to sludge lagoons (see photos #4, #5, #6, and #7). Normally, only one of the sludge lagoons receives sludge at any one time. Effluent from the sludge lagoons, and the sedimentation basins, is discharged to the Illinois River (NPDES Permit #IL0002526). The sludge in these lagoons is the waste for which the USEPA granted the temporary exclusion.

I told Mr. Bennington that it was our opinion that the ditch, holding ponds, and aeration basin (all earthen structures) are surface impoundments for hazardous waste, and that they are subject to the interim status regulations, and permitting requirements.

Mr. Bennington replied that he believed Keystone qualified for an exemption from these requirements. He said he would have more information for me during next week's follow-up inspection.

Keystone also generates more than 1,000 Kg of waste 1,1,1-trichloroethane every month. This waste is stored for 90 days or less in an open area northeast of the wire mill (see photo #14). This waste is shipped off-site under

LPC #1430050l - Peoria County
Bartonville/Keystone Steel & Wire
August 19, 1983

IEPA Special Waste Permits #812241 and #921852. All of the containers observed were properly labeled, and had been in storage for less than 90 days.

I received a copy (attachment G) of Keystone's Superfund Section 103(c) notification form. This notification was for the arc dust (K061) landfill operated by Keystone from 1970 to 1976. The closure of this landfill was monitored by the IEPA, and permitted by the Corps of Engineers under Permit I3407802. A plat was filed with the County Recorder of Deeds for this closed site, pursuant to Rule 318(c) of Chapter 7. A copy of the plat is attached.

As observed on August 19, 1983, the landfill final cover remains well vegetated, with no signs of erosion. Debris from recent flooding of the Illinois River had been deposited on the fill area. The landfill is at the edge of a marsh. Groundwater monitoring of this site was concluded on December 7, 1981.

Mr. Bennington said that prior to 1969, Keystone did not have a waste-water treatment facility. I failed to ask Mr. Bennington what Keystone did with their spent pickle liquor prior to constructing the treatment plant. In any event, Keystone did not include on their Superfund notification any information on pickle liquor disposal. Disposal of this waste prior to 1969 will have to be checked into, as will the disposal of trichloroethane.

The inspection was terminated before all information was obtained. I told Mr. Bennington a follow-up inspection would be conducted some time next week (August 22nd to 26th).

DCJ/cp

Attachments

cc: DLPC/FOS, Central Region
USEPA/Region V

Keystone Steel & Wire

RECEIVED
OCT 14 1982
WASTE MANAGEMENT BRANCH
EPA, REGION V

October 11, 1982

Mr. David Homer
Waste Management Branch - Region V
United States Environmental Protection Agency
111 West Jackson Blvd.
Chicago, IL 60604

RE: 5HW-TUB, RCRA Activities, I.D. # ILD 000714881 G, T, TSD, PA

Dear Mr. Homer:

This letter is in response to our phone conversation of October 7 when you requested additional information regarding our K061 (electric furnace emission control dust) waste. This was in regard to our June 28, 1982 letter withdrawing our Part A - Hazardous Waste Treatment, Storage, & Disposal (TSD) Permit Application dated 11/4/80 with interim status approval on 4/14/82.

As you suggested, Keystone has carefully reviewed its hazardous waste activities and associated regulations including the recent July 26, 1982 40CFR Part 122,260,264 & 265 regulations regarding TSD facilities. We have concluded that we remain only a generator of hazardous waste and do not require a TSD permit. Peoria Disposal, our waste hauler and disposal facility operator, intends to comply with the new regulations regarding the TSD requirements. The dust is collected daily by Peoria Disposal in trucks attached directly to the baghouse. Keystone has not experienced any problems with Peoria Disposal handling our hazardous waste.

Keystone originally applied for a TSD permit for a K061 waste mainly due to the USEPA recommendation that all generators do so in case they couldn't dispose of their waste. Peoria Disposal has been contacted and they intend to remain a fully licensed hazardous waste hauler and disposal facility.

For all of the above reasons, Keystone does not need a TSD Permit and we again consider it withdrawn.

If you need additional information, please call me direct (309) 697-7552.

Very truly yours,

RECEIVED 10/19/82

Dale L. Bennington

DALE L. BENNINGTON, MANAGER
ENERGY & ENVIRONMENTAL ENGINEERING

DLB:bmk
cc: J. G. Ring
L. W. Phillips
IEPA-RCRA Activities

7000 South West Adams
Peoria, IL 61641
(309) 697-7020
Subsidiary of Keystone Consolidated Industries, Inc.

390

Keystone Group™

7000 SOUTH WEST ADAMS STREET, PEORIA, IL 61641 (309) 697-7020

November 14, 1980

Mr. Y. J. Kim
U.S. EPA - Region V
RCRA Activities
P.O. Box 7861
Chicago, IL 60680

Dear Mr. Kim:

Enclosed are completed EPA forms 3510-1 and 3510-3 which is the required hazardous waste permit application for obtaining RCRA interim status for our Keystone Group - Bartonville Plant facility - EPA I.D. No. ILD ~~990817892~~. ILD000 714881

Our existing waste water treatment plant treats the hazardous waste pickle liquor (K062) and renders it non-hazardous.

It operates in accordance with NPDES Permit IL 000 2526.

The resultant listed sludge (K063) has been tested (in 1979) and found to be non-hazardous according to the Illinois EPA (1979) Leachate Test. We are now in the process of re-testing the sludge to the U.S. EPA Leachate Test standards which are essentially identical to the Illinois EPA Leachate Test standards. I also understand that the U.S. EPA is now in the process of removing WPL sludge from the hazardous waste list.

For the above reasons, the sludge and the two sludge dewatering and storage lagoons should not be part of the Hazardous Waste Management Facility that we have described in our application forms.

Very truly yours,

Dale L. Bennington

DALE L. BENNINGTON, P.E.
MANAGER, ENVIRONMENTAL ENGINEERING

DLB:bmk
Attachment(s)

cc: D. Umfleet-IEPA (NPDES Section)

Keystone Steel & Wire

March 25, 1986

Mr. Mark Schollenberger
Industrial Unit, Permit Section
Division of Water Pollution Control
Illinois Environmental Protection Agency
2200 Churchill Road
Springfield, IL 62706

RE: CONSTRUCTION PERMIT APPLICATION - NPDES PERMIT #IL0002526

Dear Mr. Schollenberger:

Enclosed are the following Construction Permit Application documents (one original and one copy):

- WPC-PS-1 (WPC-150, 2 pages)
- WPC-155 (Schedule F, 2 pages)
- Specifications (5 pages)
- Hydraulic Profile Drawing

As I stated in our March 7 meeting, Keystone anticipates reaching an agreement before April 15 with the USEPA - Region V, Division of Land Pollution regarding eliminating acidic waste waters from our various ditches and reservoirs. We propose to collect all of our acidic waters in a large tank and pump them directly to the Waste Water Treatment Plant in enclosed piping systems.

You mentioned in our meeting that the Hydraulic Profile is the major component necessary for your approval of this application.

The scheduled completion date is October 28, 1986. It is necessary to obtain both IEPA and USEPA approval before we start. To meet the schedule, we need to start on or before April 15. For this reason, we solicit your approval as soon as possible.

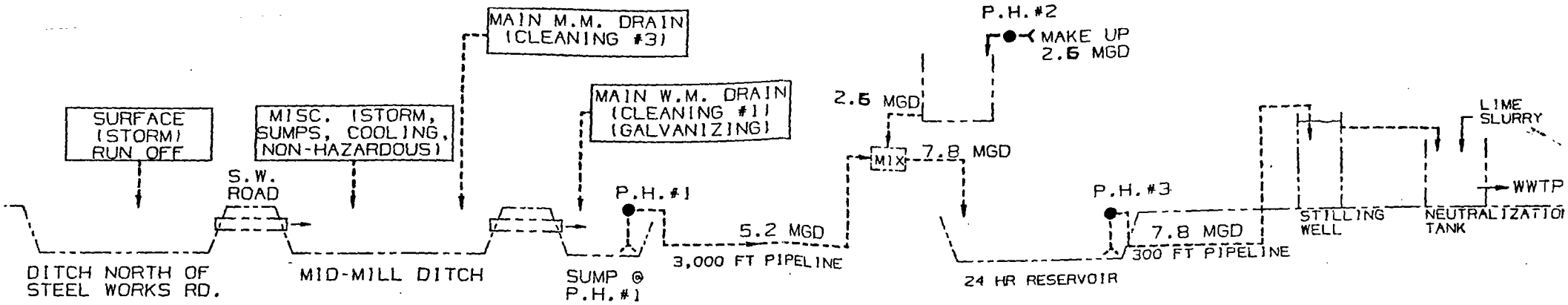
If you have any questions, please feel free to contact our engineering consultants; Clark Engineers, Mr. Dennis Hermann/Mr. Roger Keefauver at (309) 444-8464.

Sincerely,

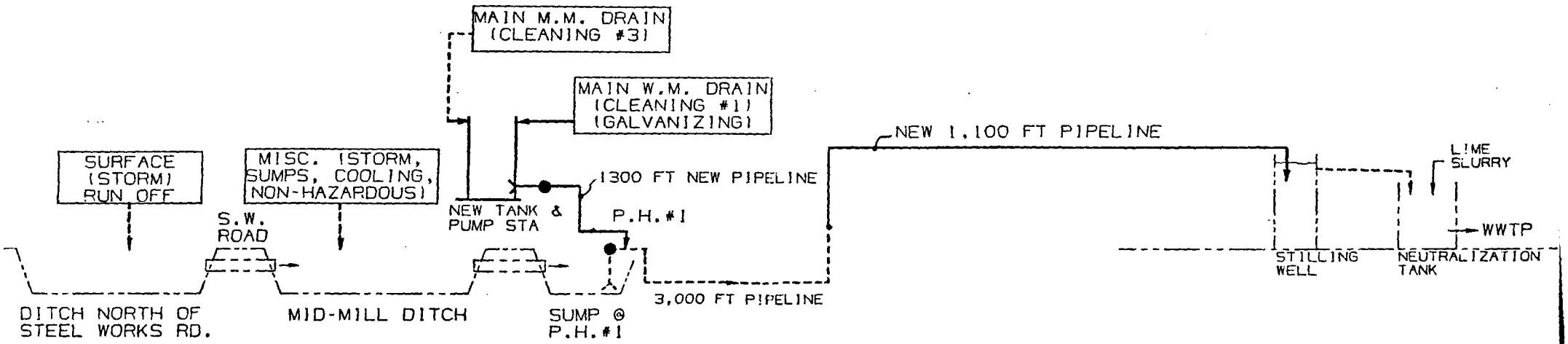
Dale Bennington

DALE L. BENNINGTON, P.E.
MANAGER, ENERGY AND
ENVIRONMENTAL ENGINEERING

DLB:bmk
Attachment(s)
cc: J. Ring (w/o att.)
J. Monroe (")
L. Phillips (")
D. Hermann(")
L. Ray - IEPA (w/att.)



EXISTING WATER SYSTEM @ WM/MM



PROPOSED WATER SYSTEM @ WM/MM

----- EXISTING

——— NEW

Dale Bennington 3/31/86

JUL 2[illegible] 1985

CERTIFIED MAIL #P246 373 051
RETURN RECEIPT REQUESTED

5HS-12

Dale Bennington, Manager
Environmental Engineering
Keystone Group - Bartonville Plant
7000 South Adams Street
Peoria, Illinois 61641

Re: Corrective Action Requirements,
Hazardous and Solid Waste
Amendments of 1984
Keystone Group - Bartonville Plant
ILD 000714881

Dear Mr. Bennington:

As you know, the Part B permit application [illegible] Resource Conservation and Recovery Act (RCRA) for the above referenced facility is due on October 15, 1985.

On November 8, 1984, the Hazardous and Solid Waste Amendments of 1984 (the Amendments) were enacted to modify RCRA. Under Section 206 (copy enclosed) of the Amendments, all RCRA permits issued after the date of enactment must provide for corrective action for all releases of hazardous waste or constituents from any solid waste management unit, regardless of the time at which waste was placed in the unit. Please note that both hazardous and non-hazardous waste can meet the definition of solid waste under 40 CFR 2[illegible].

Consequently, we must determine whether such releases have ever occurred at the facility site. If they have, we must ensure that corrective actions either have been taken, or will be taken, pursuant to the permit. An important part of our determination includes your willingness [illegible] to sign the enclosed certification statement. Please read it [illegible] and either sign it and return it, or return it to us unsigned with a [illegible] of explanation, within three weeks of the date of this letter. Any [illegible] regarding releases of hazardous waste or hazardous constituents to the [illegible] will be evaluated during the permit review process. Any tentative decisions we make concerning your permit application will be public noticed in a newspaper of general circulation in the area of the facility.

Please contact Lily Herskovits of my staff, at (312) 886-1477, for additional information.

Sincerely yours,

Edith M. Ardiente, P.E.
Chief, Technical Programs Section

Enclosures

5HS-12 Herskovits:fc 7/25/85

P 246 373 051

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL

(See Reverse)

Sent to	Dale Bennington, Manager Environmental Engineering
Street and No.	Keystone Group - Bartonville Plant
P.O., State and ZIP Code	7000 South Adams St. Peoria, Illinois 61641
Postage	$ .37
Certified Fee	.75
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to whom and Date Delivered	.70
Return receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	$ 1.84
Postmark or Date	CHICAGO ILL AUG 1 1985

PS Form 3800, Feb. 1982 ★ U.S.G.P.O. 1984-446-014

H. Witschonke: 5HS-12:STU#1: ILD 000714881

PS Form 3811, July 1983 4435-03-CP-F-1 DOMESTIC RETURN RECEIPT

SENDER: Complete items 1, 2, 3 and 4.

Put your address in the "RETURN TO" space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for service(s) requested.

1. ☐ Show to whom, date and address of delivery.
2. ☐ Restricted Delivery.

3. Article Addressed to:
Dale Bennington, Manager
Environmental Engineering
Keystone Group - Bartonville Plant
7000 South Adams St.

4. Type of Service:
☐ Registered ☐ Insured
☒ Certified ☐ COD
☐ Express Mail

Article Number
P246373051

Always obtain signature of addressee or agent and DATE DELIVERED.

5. Signature — Addressee
X

6. Signature — Agent
X

7. Date of Delivery

8. Addressee's Address (ONLY if requested and fee paid)

H. Witschonke: 5HS-12:STU#1: ILD 000714881

P 246 373 051

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL

(See Reverse)

Sent to Dale Bennington, Manager Environmental Engineering Keystone Group - Bartonville Plant	
Street and No. 7000 South Adams St.	
P.O., State and ZIP Code Peoria, Illinois 61641	
Postage	$ .39
Certified Fee	.75
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to whom and Date Delivered	.70
Return receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	$ 1.84
Postmark or Date	

CHICAGO IL POSTAL STATION AUG 1 1985

PS Form 3800, Feb. 1982 ★ U.S.G.P.O. 1984-446-014

H. Witschonke: 5HS-12:STU#1: ILD 000714881

SENDER: Complete items 1, 2, 3 and 4.

Put your address in the "RETURN TO" space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check boxes for services requested.

1. ☒ Show to whom, date and address of delivery.
2. ☐ Restricted Delivery.

3. Article Addressed to:
Dale Bennington, Manager
Environmental Engineering
Keystone Group - Bartonville Plant
7000 South Adams St.
Peoria, Illinois 61641

4. Type of Service: ☐ Registered ☐ Insured ☒ Certified ☐ COD ☐ Express Mail
Article Number: P246373051

Always obtain signature of addressee or agent and DATE DELIVERED.

5. Signature — Addressee
X

6. Signature — Agent
X

7. Date of Delivery

8. Addressee's Address (ONLY if requested and fee paid)

PS Form 3811, July 1985 247-805

DOMESTIC RETURN RECEIPT

H. Witschonke: 5HS-12:STU#1: ILD 000714881