US EPA RECORDS CENTER REGION 5
1000297

Keystone Group - Bartonville Plant

Peoria County - Bartonville, Illinois
ILD #00714881/LPC #1430050001

Supplemental Enforcement
Brochure
IEPA Enforcement #7019-HAZ

Hortense Haynes
Enforcement Programs
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I. Description of Facility: Keystone Steel and Wire manufactures nails, steel bars and rods, and fence wire and posts. The manufacturing plant is located in Bartonville, Peoria County, Illinois just south of Peoria, Illinois; its corporate headquarters is located in Dallas, Texas. The legal description which locates the Bartonville site is attached to the Supplemental Brochure as Appendix I.

The address of the plant in Bartonville is:

Keystone Steel and Wire
7000 S.W. Adams
Peoria, Illinois 61641

The address of the corporate headquarters is:

Keystone Consolidated Industries
3 Lincoln Centre
5430 LBJ Freeway
Suite 1440
Dallas, Texas 75240

Robert Singer is the current President and Chairman of the Board of Keystone Consolidated Industries.

Keystone Steel and Wire is bounded on the northeast by Interstate 474 and on the south by marsh and swamp land on the Illinois River floodplain. Two railroads (Chicago and Northwestern, and Toledo, Peoria, and Western) pass through the site.

The Keystone complex is divided into two major parts, a steel works east[1] of the Chicago and Northwestern railroad and a wire mill west of the railroad.

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[1] new apparent violations, infra, on steel works site east of Chicago & Northwestern Railroad.

II. History of the Facility: IEPA ("the Agency") referred the matter involving Keystone Consolidated Industries ("Keystone" or "the Company") to USEPA by a Brochure dated January 5, 1985 in which the Agency was seeking, in part, remedial action and a closure plan for certain of Keystone's impoundments (see Appendix ii). In a Consent Decree born out of United States of America vs. Keystone Consolidated Industries, #86-1212, Keystone agreed to, inter alia, a closure plan and payment of a $280,000.00 civil penalty. A copy of the Consent Decree is included in this Supplemental Brochure as Appendix iii. A statement of facts which led up to the filing of the action, supra, is set forth in the "Findings and Order" entered on September 24, 1986 after a hearing on the matter in U.S. District Court. That document is attached to this Supplemental Brochure, as Appendix iv.

The Company has apparenty complied with certain portions of the Consent Decree, however, other portions of the Decree have been violated, and in an inspection of the site done by the Agency on November 28, 1988, new apparent (RCRA) violations were observed. The other new apparent violations are for storing hazardous waste (arc dust) in a waste pile.

On August 19, 1988, Keystone stopped sending its arc dust (K061) to Peoria Disposal Company. Keystone began putting the arc dust in a waste pile on its property east of the Chicago and N.W. railroad. The waste pile does not meet any of the requirements for waste piles in Section 725 Subpart L, i.e., it was not placed on an impermeable surface; it has no leachate collection system; and Keystone has provided no protection from wind dispersion, run-on, and run-off. Keystone sent three shipments of arc dust to the Continental Cement Company in Hannibal, MO. as test batches speculating on

its use as an ingredient in the manufacture of cement.[2] As part of the production the arc dust was added, with other ingredients, to a cement kiln. There have been no more shipments of the arc dust by Keystone since the shipment of the three test batches.[3] Keystone stated, citing Section 721.102(e), (see Appendix V) that the arc dust was not a solid waste because it was being recycled as an ingredient used in the manufacture of cement. The Agency contends that Section 721.102(f) is an intervening factor, and provides that Respondents submit documentation showing that the material for which they seek an exemption is used by a second person in a production process. They must also demonstrate that the material achieves conditional exemption from the solid waste characterization in that "... there is a known market or disposition for the material, AND that they meet the terms of the exclusion or exemption. ..." (emphasis added) The documentation, supra, must support Respondents' claims. It is the Agency's position that Keystone has not met the burden established by 721.102(f) (see Section 721.102(f) also at Appendix V).

III. <u>List and Statement of Violations</u>

The following is a combined list and restatement of new apparent violations. All violations, with the exception of the Subpart L violations (designated with a "*"), were cited in a Compliance Letter to Keystone dated April 15, 1985 (attached hereto as Appendix vi).

[2]Manifests were used for the shipments. Continental Cement does have a Part A Permit (MOD054018288) as a TS facility.

[3]See November 28, 1988 IEPA Inspection Report at Appendix xi, p. 3.

SECTION 703.121 RCRA PERMITS

a) No person shall conduct any hazardous waste storage, hazardous waste treatment or hazardous waste disposal operation:

   1) Without a RCRA permit for the HWM (hazardous waste management) facility; or

   2) In violation of any condition imposed by a RCRA permit;

b) Owners and operators of hazardous waste management units must have permits during the active life (including the closure period) of the unit, and, for any unit which closed after January 26, 1983, during any post-closure care period required under 35 Ill. Adm. Code 724.217 and during any compliance period specified under 35 Ill. Adm. Code 724.196, including any extension of that compliance period under 35 Ill. Adm. Code 724.196(c).

SECTION 703.151(a) APPLICATION BY NEW HWM FACILITIES

a) Except as provided in subsection (c), no person shall begin physical construction of a new HWM facility without having submitted Part A and Part B of the permit application and having recieved a finally effective RCRA permit;

SECTION 722.134(a) ACCUMULATION TIME

a) Except as provided in subsections (d), (e) or (f), a generator may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status provided that:

   1) The waste is placed in containers and the generator complies with 35 Ill. Adm. Code 725 Subpart I or the waste is placed in tanks and the generator complies with 35 Ill. Adm. Code 725 Subpart J except 35 Ill. Adm. Code 725.297(c) and 725.300. In addition, such a generator is exempt from all the requirements in 35 Ill. Adm. Code 725 Subparts G and H, except for 35 Ill. Adm. Code 725.211 and 725.214;

   2) The date upon which each period of accumulation begins is clearly marked and visible for inspection on each container;

   3) While being accumulated on-site, each container and tank is labeled or marked clearly with the words, "Hazardous Waste", and

   4) The generator complies with the requirements for owners and operators in 35 Ill. Adm. Code 725 Subparts C and D and with 35 Ill. Adm. Code 725.116.

SECTION 725.113(a) GENERAL WASTE ANALYSIS

a) 1) Before an owner or operator treats, stores or disposes of any hazardous waste, the owner or operator shall obtain a detailed chemical and physical analysis of a representative sample of the waste.

At a minimum, this analysis must contain all the information which must be known to treat, store or dispose of the waste in accordance with the requirements of this Part.

2) The analysis may include data developed under 35 Ill. Adm. Code 721 and existing published or documented data on the hazardous waste or on waste generated from similar processes.

(Board Note: For example, the facility's record of analyses performed on the waste before the effective date of these regulations or studies conducted on hazardous waste generated from processes similar to that which generated the waste to be managed at the facility may be included in the data base required to comply with subsection (a)(1). The owner or operator of an off-site facility may arrange for the generator of the hazardous waste to supply part or all of the information required by subsection (a)(1). If the generator does not supply the information and the owner or operator chooses to accept a hazardous waste, the owner or operator is responsible for obtaining the information required to comply with this Section.)

3) The analysis must be repeated as necessary to insure that it is accurate and up-to-date. At a minimum, the analysis must be repeated:

A) When the owner or operator is notified, or has reason to believe, that the process or operation generating the hazardous waste has changed; and

B) For off-site facilities, when the results of the inspection required in subsection (a)(4) indicate that the hazardous waste received at the facility does not match the waste designated on the accompanying manifest or shipping paper.

4) The owner or operator of an off-site facility shall inspect and, if necessary, analyze each hazardous waste movement received at the facility to determine whether it matches the identity of the waste specified on the accompanying manifest or shipping paper.

SECTION 725.115(b) GENERAL INSPECTION REQUIREMENTS

b) 1) The owner or operator shall develop and follow a written schedule for inspecting all monitoring equipment, safety and emergency equipment, security devices and operating and structural equipment (such as dikes and sump pumps) that are important to preventing, detecting or responding to environmental or human health hazards.

2) The owner or operator shall keep this schedule at the facility.

3) The schedule must identify the types of problems (e.g., malfunctions or deterioration) which are to be looked for during the inspection (e.g., inoperative sump pump, leaking fitting, eroding dike, etc.).

4) The frequency of inspection may vary for the items on the schedule. However, it should be based on the rate of possible deterioration of the equipment and the probability of an environmental or human health incident if the deterioration or malfunction or any operator error goes undetected between inspections. Areas subject to spills, such as loading and unloading areas, must be inspected daily when in use. At a minimum the inspection schedule must include the items and frequencies called for in Sections 725.274, 725.293, 725.295, 725.326, 725.447, 725.477 and 725.503.

SECTION 725.115(d)

d) The owner or operator shall record inspections in an inspection log or summary. The owner or operator shall keep these records for at least three years from the date of inspection. At a minimum, these records must include the date and time of the inspection, the name of the inspector, a notation of the observations made and the date and nature of any repairs or other remedial actions.

SECTION 725.116(a) PERSONNEL TRAINING

a) 1) Facility personnel must successfully complete a program of classroom instruction or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the requirements of this Part. The owner or operator must ensure that this program includes all the elements described in the document required under paragraph (d)(3) of this Section.

2) This program must be directed by a person trained in hazardous waste management procedures, and must include instruction which teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to the positions in which they are employed.

3) At a minimum, the training program must be designed to ensure that facility personnel are able to respond effectively to emergencies by familiarizing them with emergency procedures, emergency equipment and emergency systems, including where applicable:

A) Procedures for using, inspecting, repairing and replacing facility emergency and monitoring equipment;

B) Key parameters for automatic waste feed cut-off systems;

C) Communications or alarm systems;

D) Response to fires or explosions;

E) Response to groundwater contamination incidents; and

F) Shutdown of operations.

SECTION 725.116(b)

Facility personnel must successfully complete the program required in paragraph (a) of this Section upon the effective date of these regulations or six months after the date of their employment or assignment to a facility or to a new position at a facility, whichever is later. Employees hired after the effective date of these regulations must not work in unsupervised positions until they have completed the training requirements of paragraph (a) of this Section.

SECTION 725.116(c)

Facility personnel must take part in an annual review of the initial training required in paragraph (a) of this Section.

SECTION 725.116(d)

The owner or operator must maintain the following documents and records at the facility:

1) The job title for each position at the facility related to hazardous waste management and the name of the employee filling each job;

2) A written job description for each position listed under paragraph (d)(1) of this Section. This description may be consistent in its degree of specificity with descriptions for other similar positions in the same company location or bargaining unit, but must include the requisite skill, education or other qualifications and duties of facility personnel assigned to each position;

3) A written description of the type and amount of both introductory and continuing training that will be given to each person filling a position listed under paragraph (d)(1) of this Section;

4) Records that document that the training or job experience required under paragraphs (a), (b) and (c) of this Section has been given to and completed by facility personnel.

SECTION 725.152(a) CONTENT OF CONTINGENCY PLAN

a) The contingency plan must describe the actions facility personnel must take to comply with Sections 725.151 and 725.156 in response to fires, explosions or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil or surface water at the facility.

SECTION 725.152(c)

The plan must describe arrangements agreed to by local police departments, fire departments, hospitals, contractors and state and local emergency response teams to coordinate emergency services, pursuant to Section 725.137.

SECTION 725.152(e)

The plan must include a list of all emergency equipment at the facility (such as fire extinguishing systems, spill control equipment, communications and alarm system (internal and external) and decontamination equipment) where this equipment is required. This list must be kept up to date. In addition, the plan must include the location and a physical description of each item on the list and a brief outline of its capabilities.

SECTION 725.153 COPIES OF CONTINGENCY PLAN

A copy of the contingency plan and all revisions to the plan must be:

a) Maintained at the facility; and

b) Submitted to all local police departments, fire departments, hospitals and state and local emergency response teams that may be called upon to provide emergency services.

SECTION 725.155 EMERGENCY COORDINATOR

At all times, there must be at least one employee either on the facility premises or on call (i.e., available to respond to an emergency by reaching the facility within a short period of time) with the responsibility for coordinating all emergency response measures. This emergency coordinator must be thoroughly familiar

with all aspects of the facility's contingency plan, all operations and activities at the facility, the location and characteristics of waste handled, the location of all records within the facility and the facility layout. In addition, this person must have the authority to commit the resources needed to carry out the contingency plan.

Comment: The emergency coordinator's responsibilities are more fully spelled out in Section 725.156. Applicable responsibilities for the emergency coordinator vary, depending on factors such as type and variety of waste(s) handled by the facility and type and complexity of the facility.

SECTION 725.155 OPERATING RECORD

a) The owner or operator shall keep a written operating record at the facility.

b) The following information must be recorded as it becomes available and maintained in the operating record until closure of the facility.

1) A description and the quantity of each hazardous waste received nd the method(s) and date(s) of its treatment, storage or disposal at the facility as required by Appendix A;

2) The location of each hazardous waste within the facility and the quantity at each location. For disposal facilities the location and quantity of each hazardous waste must be recorded on a map or diagram of each cell or disposal area. For all facilities this information must include cross-references to specific manifest document numbers if the waste was accompanied by a manifest;

(Board Note: See Sections 725.219, 725.379 and 725.409 for related requirements.)

3) Records and results of waste analysis and trial tests performed as specified in Sections 725.113, 725.300, 725.325, 725.352, 725.373, 725.414, 725.441, 725.475 and 725.502;

4) Summary reports and details of all incidents that require implementing the contingency plan as specified in Section 725.156(j);

5) Records and results of inspections as required by Section 725.115(d) (except these data need be kept only three years);

6) Monitoring, testing or analytical data where required by Sections 725.190, 725.194, 725.291, 725.293, 725.295, 725.376, 725.378, 725.380(d)(1), 725.447 and 725.477; and

(Board Note: As required by Section 725.194, monitoring data at disposal facilities must be kept throughout the post-closure period).

7) All closure cost estimates under Section 725.242 and, for disposal facilities, all post-closure cost estimates under Section 725.244.

*SECTION 725.174(a) AVAILABILITY, RETENTION AND DISPOSITION OF RECORDS

a) All records, including plans, required under this Part must be furnished upon request and made available at all reasonable times for inspection by any officer, employee or representative of the Agency who is duly designated by the Director.

This apparent violation was observed in an inspection of the facility on November 28, 1988. The facility did not provide all required documenets for review. The waste analysis plan, inspection schedules and records, and training records were not made available.

SUBPART L: WASTE PILES

*SECTION 725.351 PROTECTION FROM WIND

The owner or operator of a pile containing hazardous waste which could be subject to dispersal by wind must cover or otherwise manage the pile so that wind dispersal is controlled.

*SECTION 725.353(a) CONTAINMENT

If leachate or runoff from a pile is a hazardous waste, then either:

a) 1) The pile msut be placed on an impermeable base that is compatible with the waste under the conditions of treatment or storage;

2) The owner or operator must design, construct, operate and maintain a run-on control system capable of preventing flow onto the active portion of the pile during peak discharge from at least a 25-year storm;

3) The owner or operator must design, construct, operate and maintain a run-off management system to collect and control at least the water volume resulting from a 24-hour, 25-year storm; and

4) Collection and holding facilities (e.g., tanks or basins) associated with run-on and run-off control systems must be emptied or otherwise managed expeditiously to maintain design capacity of the system; or

*SECTION 725.353(b)

1) The pile must be protected from precipitation and run-on by some other means; and

2) No liquids or wastes containing free liquids may be placed in the pile.

Board Note: If collected leachate or runoff is discharged through a point source to waters of the United States, it is subject to the requirements of Section 12 of the Illinois Environmental Protection Act, as amended.

*SECTION 725.354 DESIGN REQUIREMENTS

The owner or operator of a waste pile is subject to the requirements for liners and leachate collection systems or equivalent protection provided in 35 Ill. Adm. Code 724.351, with respect to each new unit, replacement of an existing unit, or lateral expansion of an existing unit that is within the area identified in the Part A permit application, and with respect to waste received beginning May 8, 1985.

*No Compliance Inquiry Letter Sent

IV. Remedy

A. Background

In 1986 Keystone submitted a Closure Plan to the Agency which was subsequently rejected. The Closure Plan was submitted as the result of a Complaint filed on July 18, 1986 by USEPA for IEPA for certain RCRA violations by Keystone. The Plan was to address, inter alia, groundwater monitoring measures and Keystone's unlined earthen impoundments.

B. Statement of Current Status

The Agency's rejection of the Keystone Closure Plan seemed to mark a cessation of all activity by Keystone to enter into any form of remedial activity (including preparation of a follow-up of the rejected Closure Plan)

which would see the Company's compliance with RCRA regulations. The July proceedings, supra, produced an order entered by Judge Mihok on September 24, 1986 entitled, "Findings and Order". That document references the Closure Plan which had (on that date) already been submitted by Keystone. In a Consent Decree filed in this matter on June 29, 1988, the Court again addresses the plan, its approval, and implementation. Paragraph 8 of that document states, "... Keystone shall continue in good faith to seek approval of a closure plan from IEPA." The Closure Plan, having been rejected by the Agency later in 1986, was the last plan submitted by Keystone. (It is included in this Supplemental Brochure with the letter from Lawrence Eastep of IEPA as Appendices xii and xiii, respectively. Reasons for the Agency's rejection of the Plan are stated in Mr. Eastep's correspondence.) To date, there has been no attempt by Keystone to modify, update, or amend the Closure Plan.

The June 29, 1988 Consent Order also addresses the area of civil penalties. It states, "... Keystone shall pay a civil penalty totalling $280,000.00 plus interest...". The payment was ordered to be made over a period of 3 years. This penalty is apparently of no consequence to Keystone. The Company has compounded its violations (witness: 2 new violations have been observed); and pre-enforcement conferences and legal proceedings have apparently failed to create in the Company the awareness necessary for it to come into compliance. Finally, the Company has failed to submit an acceptable closure plan. By its conduct, Keystone has demonstrated gross indifference and recalcitrance. In the latter intance, Keystone, by virtue of the fact that it has not "continued in good faith to seek approval of a closure plan" from IEPA after the rejection of the first apparently inadequate plan, is in violation of the Consent Decree of June 29, 1988.

The Agency submits that Keystone's violation of the June 29, 1988 Consent Decree coupled with its continuing violations, and the compounding factor of the two new violations, have brought it to the level of a high-priority violator.

We urge USEPA to file a complaint in Federal District Court asking the court to order the company to prepare and submit an acceptable closure plan for IEPA review, and to include in the plan the Section 725 Subpart L violations pertaining to the arc dust pile. The Agency deems the arc dust pile a RCRA regulated waste and not a solid waste as argued by Keystone. Then, too, there exists a potential for harm to public health and the environment because of the run-off from the unprotected waste pile, and there is no groundwater monitoring. IEPA strongly urges that the maximum daily civil penalty of $25,000.00 be sought against Keystone. Finally, the Agency asks that relief be immediate.

LIST OF APPENDICES

APPENDIX i	Long legal description of Keystone Steel and Wire, Bartonville, Illinois plant
APPENDIX ii	Enforcement Brochure dated January 5, 1985
APPENDIX iii	Consent Decree
APPENDIX iv	Findings and Order
APPENDIX v	RCRA Sections 721.102(e) and (f)
APPENDIX vi	Compliance Inquiry Letter dated April 15, 1985
APPENDIX vii	RCRA Inspection Report dated February 22, 1985
APPENDIX viii	IEPA Inspection Report dated February 23, 1988
APPENDIX ix	IEPA Inspection Report dated March 14, 1988
APPENDIX x	Compliance Inqiry Letter dated April 15, 1988
APPENDIX xi	IEPA Inspection Report dated November 28, 1988
APPENDIX xii	Closure Plan - Keystone Steel & Wire Co.
APPENDIX xiii	Letter dated September 29, 1986 Signed by Lawrence Eastep to Kirkland & Ellis

HH:ct/2227k,spl-16

LONG LEGAL DESCRIPTION

TERMINAL PLACE SE 1/4 SEC 25-8-7E
LOTS 14 & 15 BLOCK 2

17-25-425-011

NE 1/4 SEC 25-8-7E 21 193 AC
BEG 322' W of SE COR NE 1/4 SEC 25: TH W
911.9' NE 33' W 47.54' NE 780' E 47 54' NE
766.8 E 145.28' SE ALG CURVE 1577.1' TO POB

17-25-276-001

ACME SUB NE 1/4 SEC 25-8-7E
LOTS 49 THR 55 BLK 4

17-25-260-001

KEYSTONE ADD SESE 1/4 SEC 25-8-7E
LOTS 1 THRU 11 INCL VACATED ST

17-25-403-004

TERMINAL PLACE SEC 25-8-7E
BLK 1; ALSO LOTS 6 THRU 21 SOUTH BARONVILLE SUB;
ALSO ALL THAT PT SE 1/4 LYING E OF S ADAMS ST.,
S OF KEYSTONE ADD, W OF P&PU RR ROW, & N OF
TERMINAL PLACE & SOUTH BARTONVILLE SUB

17-25-451-001

ACME SUB NE 1/4 & SE 1/4 SEC 25-8-7E LOTS 12
THRU 30 & LOTS 43 THRU 61 BLK 5 INCLUDING
VACATED ST & ALLEY (EXC PT LOTS 12-13-43-44
BLK 5 PER 460/612 460/626 TO SBI TRE 9)

17-25-261-001

SE 1/4 SEC 25-8-7E 0.79 AC (982-240)
COMG INTERSEC N LN S 1/2 SE 1/4 SEC 25 & SE
LN P&PU RR ROW; TH SW ALGA SD SE LN 549.2 E
1005.3' TO POB; TH E 167' SW 280.4' W
90.58' N 268.4' TO POB

17-25-476-002

SE 1/4 SEC 25-8-7E 44.01 AC
ALL THAT PT SE 1/4 SEC 25 LYING
BETWEEN P&PU RR ROW & C&NW RR ROW
(EXC S 16.501 AC THEREOF)

17-25-426-001

SW 1/4 SEC 25-8-7E (403-103 & 407-6)
BEG NE COR S 1/2 SW 1/4 SEC 25: TH W 330'
S 174' E 330' N 174' TO POB & ALL THAT PT
VAC JEFFERSON AVE LYING N OF & ADJ THERETO

17-25-376-001

NE 1/4 NE 1/4 SEC 36-8-7E 24.1 AC
(EXC THAT PT THEREOF LYING WLY OF E LIN
C&NW RR ROW)

17-36-226-001

NE 1/4 SEC 36-8-7E 4 ACRES (71-14696)
THE NLY 66' OF THE S 1/2 NE 1/4 SEC
36-8-73 LYING ELY OF THE R/R/ ROW

17-36-376-001

NW 1/4 SEC 6-7-8E 12.59 AC

21-06-100-001

HH:ct:dks,sp,2227k, 1-17

Keystone Group - Bartonville Plant
Peoria County/Bartonville, Illinois
ILD #00714881/LPC #14300501

Enforcement Brochure
IEPA Enf. #7019-HAZ

Virginia I. Yang
Enforcement Programs
Land Pollution Control Division
217/782-9825

JANUARY 5, 1985

Keystone Group - Bartonville Plant
Peoria County/Illinois
ILD #00714881/LPC #14300501

Keystone operates a steel and wire manufacturing plant which produces semi-finished and finished wire products. This manufacturing process generates approximately 10,000 gallons of waste pickle liquor (K062) per day. The K062 waste pickle liquor is mixed with other plant waste streams and directed through as series of drainage ditches, holding ponds, and basins to the wastewater treatment plant. (NPDES Permit No. IL002526) This facility has a design capacity of approximately 20,000 gallons per day. The acidic K062 wastewater is pre-neutralized to raise the pH to 5 or greater and then lime neutralized in a neutralization tank (T04). The neutralized wastewater is directed to sedimentation basins (T02) where solids are precipitated out. These sludges (K063 lime neutralized waste pickle liquor sludge) are pumped to two sludge storage lagoons (D83). The treated wastewater effluent from the sedimentation basins and the sludge lagoons is discharged to the Illinois River. (See attached diagram and Documents Nos. 1, 2, 6, and 31.)

Keystone notified USEPA of its RCRA hazardous waste activities on August 15, 1980 and of its potential CERCLA hazardous waste site on May 22, 1981. Keystone submitted its Part A RCRA permit application on November 14, 1980. In that application, Keystone described the following hazardous waste facilities and hazardous waste streams:

S03 - Waste pile for storage of K061
D80 - Landfill for disposal of K061
T02 - Surface impoundment for treatment of K063
D83 - Surface impoundment for disposal of K063
T04 - (Other) Wastewater treatment plant for treatment for K062

The treatment, storage, and disposal of the K062 waste pickle liquor waste stream is the subject of this enforcement summary. (See attached diagram and Document 1, 2 and 6.)

The K063 wastewater treatment sludge generated by Keystone's neutralization process was temporarily exempted as a listed RCRA hazardous waste in 8/6/81 (46FR40153) in response to Keystone's 2/13/81 petition for hazardous waste delisting. This K063 waste stream was excluded by USEPA in its 6/5/84 final rulemaking to amend the RCRA regulations by exempting lime stabilized waste pickle sludge generated from an iron and steel industrial facility. This final rule was effective December 5, 1984. As a result of these rulemaking proceedings for delisting of the K063 waste stream, Keystone requested the withdrawal of its Part A RCRA Permit Application in June 28, 1982. This request was granted by USEPA on February 15, 1983. (See Documents Nos. 3, 4, 5, 7, 9, 10, 11, 12, 27, and 29.)

The Illinois Environmental Protection Agency completed its inital RCRA ISSI evaluation of the Keystone Group - Bartonville Plant in August, 1983. In its 8/19/83 and 8/26/83 Report and Memorandum, IEPA concluded that various portions of the wastewater treatment facility at the Bartonville plant were subject to the RCRA Interim Status Standards for the treatment, storage, and disposal of the waste pickle liquor (K062) generated at this facility. These regulated areas are identified in the attached diagram as "Drainage Ditch", "North Holding Pond", "South Holding Pond", "Mixing Chamber" (T04) and "Aeration Basin" (T04). These facilities are considered RCRA surface impoundments which transport, store, and treat the K062 waste pickle liquor. A second regulated area identified "1982 Dredged Sediment Dump Area" is located to the west of the two holding ponds. Photographs of these areas are included in the 8/19/83 inspection report and memorandum by David C. Jansen, IEPA Field Operations Inspector for Land Pollution Control Division. (See attached diagram and Documents No. 14 and 15.)

In response to Keystone's arguements, the IEPA concluded that the waste pickle liquor generated at the Bartonville plant as well as various portions of the facility are subject to state and federal RCRA requirements for hazardous waste treatment, storage, and disposal. First, Keystone's laboratory analysis of the waste pickle liquor is inadequate as a claim for exemption since the waste pickle liquor remains a listed hazardous waste K062 generated from steel finishing operations as provided in 35 Ill. Adm. Code 721.132 (40 CFR 264.21). The regulatory delisting procedures and rule making regarding the lime stabilized waste pickle liquor sludge, formerly listed as K063 under 35 Ill. Adm. Code 721.132 (40 CFR 261.32) is not applicable to the K062 waste pickle liquor generated at the Bartonville plant. Keystone has never submitted a similar petition for the delisting of K062 as provided under 35 Ill. Adm. Code 720.120 or 40 CFR 260.120.

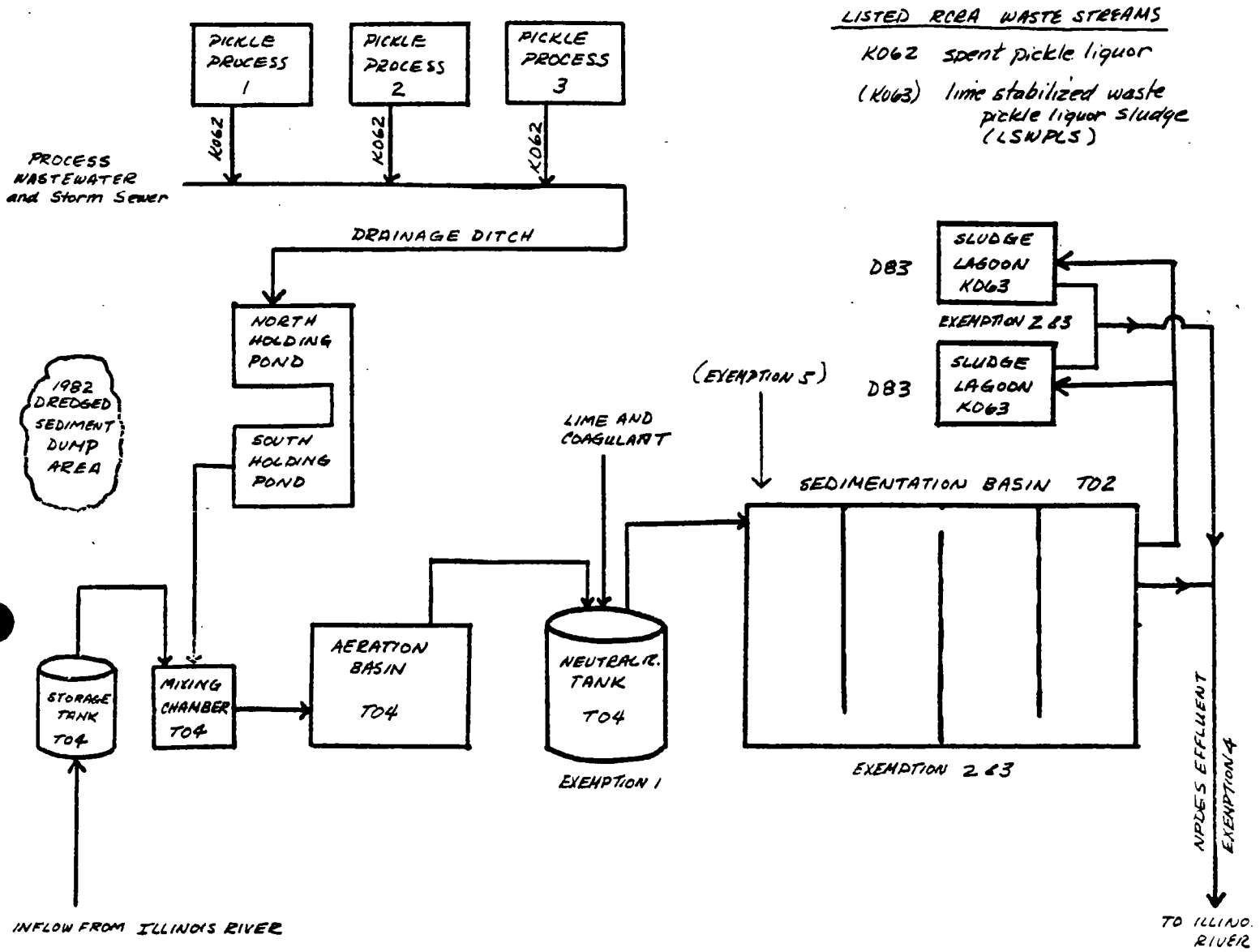
Secondly Keystone's intrepretation of "elementary neutralization" process and "totally enclosed treatment facility" as defined by 35 Ill. Adm. Code 721.110 (40 CFR 260) and as exempted by 35 Ill. Adm. Code 721.104 and 35 Ill. Adm. Code 725.101 (40 CFR 261 and 265) is not supported by the design of these specific units within their facility. Both definitions require that these devices are "pipe", "tank", "container", or "vessel" as defined by 35 Ill. Adm. Code 720.110 (40 CFR 260). These definitions would excluded the following units at the Keystone-Bartonville plant: 1) the drainage ditch in which storm water and K062 process wastewater flowing thru the plant, 2) the north and south holding ponds, 3) the mixing chamber, and 4) the aeration basin. These facilities have been classified by this Agency as RCRA storage or treatment facilities. Keystone's claimed exemptions may however apply to the "mixing chamber" if this unit is considered a "container". The area

An alternative remedy could require Keystones to submit adequate information to support a formal petition to delist the K062 waste pickle liquor generated at its facility as provided under 35 Ill. Adm. Code 720.120 and 40 CFR 260.120. If Keystone elects to petition for delisting, this Agency recommends the inclusion of the following remedial action: 1) sampling and analysis of soil sediments located in the vicinity of the drainage ditch, the north and south holding ponds and the 1982 dredged sediment dump area; 2) sampling and analysis of the K062 wastewater prior to its discharge into the wastewater treatment facility; and 3) development of a groundwater monitoring program that satisfies the requirements of Subpart F 35 Ill. Adm. Code or Subpart F 40 CFR 264.

STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY

IL 532-0357
ADM 39
054-002

Subject KEYSTONE - BARTONVILLE PLANT (ILD# 000714881)
Data Regulated and Exempted Units
Reviewed by and Waste Streams (RCRA) Date NOVEMBER, 1984



COMMENTS regarding applicable exemptions:

1- "Wastewater treatment unit" exemption 35 I.A.C. 725.101(c)(10)
2- USEPA Delisting of K063 for Keystone-Bartonville Plant 8/6/81 Federal Register (46FR40154)
3- USEPA Final Rulemaking for the exclusion of LSWPLS 6/5/84 Federal Register (49FR23283)
4- Exemption for NPDES point source discharge of wastewater 35 I.A.C. 721.104(a)(2)
5- Exemption for reused spent pickle liquor 35 I.A.C. 721.106 and 9/8/81 Federal Register (46FR449

USEPA Part A Application Codes:

T02 Surface Impoundment for treatment of K063
D83 Surface Impoundment for disposal of K063
T04 Other processes for treatment of K062

NOTE: DIAGRAM DOES NOT REPRESENT ACTUAL ARRANGEMENT OF UNITS AT BARTONVILLE SITE
DIAGRAM NOT DRAWN TO SCALE

17) 10-5-83 IEPA/Water Pollution Control Memorandum (1 pp.)

18) 10-24-83 IEPA/FOS Compliance Inquiry Letter (4 pp.)

19) 10-26-83 Keystone Correspondence to IEPA/FOS (2 pp.)

20) 11-8-83 Keystone Correspondence to IEPA/FOS (2 pp.)

21) 11-23-83 IEPA/FOS Correspondence to Keystone (2 pp.)

22) 11-28-83 IEPA/Water Pollution Control Division Memorandum with attachments:

    a) 8-4-66 IEPA/Water Pollution Memorandum (2 pp.)
    b) 9-26-67 IEPA/Water Pollution Control Memorandum (5 pp.)
    c) 8-14-68 IEPA Permit #1968-EA-524 for construction and operation of industrial acid waste treatment plant (1 pp.)
    d) 3-10-71 Keystone "Waste Water Neutralization Plant" (25 pp.)

23) 12-6-83 Keystone Analytical Data (4 pp.)

24) 12-16-83 Keystone Correspondence to IEPA (7 pp.)

25) 1-4-84 Federal Register, 49 FR 427 (4 pp.)

26) 1-17-84 IEPA/FOS Memorandum with attachments (9 pp.)

27) 2-20-84 Keystone Correspondence to USEPA re Delisting Petition with attachments (9 pp.)

28) 3-19-84 Keystone Correspondence to IEPA (2 pp.)

29) 6-5-84 Federal Register, 49 FR 23283 (5 pp.)

30) Keystone Plan Sheets (2): "Wastewater Neutralization Plant - General Arrangements and Schematic Waste Process"

31) NPDES Permit No. IL002526, effective March 25, 1979, expires September 30, 1980 (13 pp.)

VIY:bv/sp/2219D/1-9

PEORIA CTY - 143005001
BARTONVILLE/KEYSTONE

FILED

JUN 29 1988

JOHN M. WATERS, Clerk
U. S. DISTRICT COURT
CENTRAL DISTRICT OF ILLINOIS

IN THE UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF ILLINOIS

UNITED STATES OF AMERICA, Plaintiff, v. KEYSTONE CONSOLIDATED INDUSTRIES, INC., Defendant.	Civil Action No. 86-1212 Judge Mihm

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ENFORCEMENT PROGRAMS

JUL 06 1988

Environmental Protection Agency

CONSENT DECREE

Plaintiff, the United States of America, on behalf of the United States Environmental Protection Agency ("United States"), and the defendant, Keystone Consolidated Industries, Inc., have jointly moved the Court for entry of this consent decree.

THEREFORE, it is ORDERED, ADJUDGED and DECREED as follows:

I. JURISDICTION

1. This Court has jurisdiction of the subject matter of this action and of the parties to this consent decree.

II. APPLICABILITY

2. This consent decree applies to and binds the parties hereto and their successors.

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JUL 7 1988
IEPA-DLPC

III. BACKGROUND

3. The United States filed the complaint in this action on July 18, 1986 alleging that defendant Keystone Consolidated Industries, Inc. ("Keystone") was violating the Resource Conservation and Recovery Act, 42 U.S.C. § 6901, et seq. ("RCRA") at Keystone's plant in Peoria, Illinois known as the Bartonville Plant. The United states sought injunctive relief and civil penalties. Keystone denied the principal allegations of the complaint.

4. The United States moved for a preliminary injunction. A hearing on the motion was held on July 24 and 28, 1986. At the hearing and in a written order dated September 24, 1986 the Court ordered Keystone to cease placing certain wastes in certain impoundments and other structures at the Bartonville Plant by October 1, 1986. Keystone complied with the order.

5. Under RCRA Keystone must close the impoundments and other structures according to an approved closure plan. The United States asserts that the Illinois Environmental Protection Agency ("IEPA") has authority to approve RCRA closure plans in Illinois, including any plan submitted by Keystone. Keystone asserts that this Court has authority to determine the nature and sufficiency of RCRA closure measures.

6. In an effort to avoid unnecessary and costly litigation, Keystone has submitted a proposed closure plan to IEPA. At the time of this partial consent decree there is a

substantial likelihood that Keystone and IEPA will agree on a closure plan, and that Keystone then will implement it.

CLOSURE PLAN APPROVAL AND IMPLEMENTATION

7. Keystone shall close its impoundments and other structures as required by RCRA and consistent with the following provisions of this consent decree.

8. Keystone shall continue in good faith to seek approval of a closure plan from IEPA.

9. Keystone shall implement the closure plan approved or issued by IEPA according to the schedule set forth in the approved plan unless, within 30 days of such approval or issuance, Keystone petitions the Court for alternative closure requirements under paragraph 21 of this consent decree and the Court ultimately grants such relief. In the latter case Keystone shall close subject to terms and according to a schedule imposed by the Court.

10. The parties reserve their respective positions concerning whether this Court has authority to review RCRA closure plans or to authorize closure on terms other than those required by a State-approved plan. This consent decree does not confer such authority on the Court.

CIVIL PENALTY

11. Keystone shall pay a civil penalty totalling $280,000 plus interest as specified below.

12. Keystone shall pay the $280,000 principal amount according to the following schedule:

a. $30,000 shall be paid within 30 days after entry of this consent decree.

b. $125,000 shall be paid one year after entry of this consent decree or 30 days after IEPA approval of a closure plan, whichever is later, but in any event no later than two years after entry of this consent decree;

c. $125,000 shall be paid two years after entry of this consent decree.

13. Except as is specifically stated in paragraph 12.b, payment of the above civil penalty is not contingent on Keystone receiving approval of a closure plan, or on any determination the Court may make on closure plan approval authority.

14. Keystone shall pay no interest on the principal amount due under the first payment ($30,000) if the payment is made on time. If the payment is late, Keystone shall pay interest on it which shall begin to accrue on the date the payment is due.

15. Keystone shall pay interest on the principal amounts due under the second and third payments ($125,000 each) which shall began to accrue on the date of entry of this consent decree.

16. Interest shall accrue on the declining principal balance at the rate provided in 28 U.S.C. §1961(a), that is, a rate equal to the coupon issue yield equivalent (as determined by

the Secretary of the Treasury) of the average accepted auction price for the last auction of 52-week U.S. Treasury bills settled 30 days prior to the time of each payment. Interest shall be compounded annually.

17. Accrued interest on a principal amount shall be due when payment of the principal amount is due.

18. Keystone shall pay civil penalty amounts and interest by certified check payable to "Treasurer, United States of America." Keystone shall send checks, with a transmittal letter stating the caption and number of this action and the paragraph of this consent decree under which payment is being made, to:

U.S. Environmental Protection Agency
Region V
P.O. Box 70753
Chicago, Illinois 60673

Keystone shall send a copy of the transmittal letter to:

U.S. EPA, Region V
Waste Management Division
RCRA Enforcement Branch, 5HS-12
230 South Dearborn Street
Chicago, Illinois 60604

GENERAL PROVISIONS

19. Approval and entry of this consent decree by the Court, and compliance with it by Keystone, shall satisfy all of Keystone's civil liability for the violations alleged in the complaint.

20. Keystone shall make no claim against the United States or the Hazardous Substance Superfund established by

Section 221 of the Comprehensive Environmental Response, Compensation and Liability Act ("CERCLA"), 42 U.S.C. §9631, for any costs incurred by Keystone in complying with this consent decree.

21. The Court shall retain jurisdiction to enforce and modify this consent decree and to resolve disputes arising under it.

22. This consent decree does not eliminate or affect Keystone's responsibility to comply with RCRA and other federal and state environmental laws, including any responsibility Keystone may have under the corrective action authority established by Sections 3004(u), 3004(v), and 3008(h) of RCRA, 42 U.S.C. §6924(u), 6924(v), and 6928(h).

23. Approval by the Court and entry of this consent decree is subject to 28 C.F.R. §50.7, which requires that notice of proposed consent decrees in certain environmental actions be given to the public, and that the public shall have at least thirty days to submit comments on the proposed consent decree.

By their undersigned counsel the parties enter into this consent decree and submit it to the Court for approval and entry.

IT IS SO ORDERED.

June 29, 1988
Date

Michael M. Mihm
HONORABLE MICHAEL M. MIHM
United States District Judge

FOR KEYSTONE CONSOLIDATED INDUSTRIES, INC.

NICHOLAS R. OWENS
President
Keystone Consolidated Industries, Inc.

JAMES H. SCHINK
ANDREW R. RUNNING
Kirkland & Ellis
200 East Randolph Drive
Chicago, Illinois 60601
Attorneys for Keystone Conslidated Industries, Inc.

FOR THE UNITED STATES

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Assistant Attorney General
Land and Natural Resources Division
U.S. Department of Justice

GERALD D. FINES
United States Attorney
Central District of Illinois

L. LEE SMITH
Assistant United States Attorney

VALDAS V. ADAMKUS
Regional Administrator
Region V
U.S. Environmental Protection Agency

for THOMAS L. ADAMS, JR.
Assistant Administrator
Office of Enforcement and Compliance Monitoring
U.S. Environmental Protection Agency

Mark E. Grummer by B.R.

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Attorney, Environmental
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Marc M. Radell

MARC RADELL
Assistant Regional Counsel
U.S. Environmental Protection
Agency - Region V

Peoria County - Keystone
LPC#1430050

FILED

SEP 24 1986

JOHN M. WATERS, Clerk
U. S. DISTRICT COURT
CENTRAL DISTRICT OF ILLINO

UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF ILLINOIS

UNITED STATES OF AMERICA, Plaintiff, v. KEYSTONE CONSOLIDATED INDUSTRIES, INC., Defendant.	Civil Action No. 86-1212 Judge Mihm

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OCT 14 1986

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FINDINGS AND ORDER

On July 18, 1986 the United States filed its complaint alleging violations by Keystone Consolidated Industries, Inc. ("Keystone") of the Resource Conservation and Recovery Act, 42 U.S.C. §6901 et seq. ("RCRA"). The United States filed a motion for a preliminary injunction seeking an order that Keystone cease discharging hazardous wastes into land disposal units on Keystone's property, and other relief. A hearing on the preliminary injunction motion was held on July 24 and 28, 1986.

The Court makes the following findings and order on the basis of the memoranda submitted in support of the motion, stipulations by the parties, the testimony given and exhibits submitted at the hearing, and the affidavit submitted by Keystone on August 6, 1986. These findings of fact are made for purposes of this motion only.

1. Keystone owns and operates a manufacturing plant in Peoria, Illinois known as the Bartonville Plant. The Bartonville Plant produces finished and semi-finished steel rod and wire products.

2. Finishing operations at the plant generate a by-product called spent pickle liquor. Untreated pickle liquor is a hazardous waste and is listed as hazardous waste K062 under RCRA and its implementing regulations.

3. Keystone's spent pickle liquor is discharged into a plant sewer pipe where it mixes with plant process water in a "totally enclosed treatment system," as that phrase is defined in 35 Ill. Adm. Code §720.110. The resulting liquid is discharged to earthen impoundments. From the earthen impoundments the liquid flows to a wastewater treatment plant where it is treated and discharged to the Illinois River.

4. For purposes of this motion the United States established that the liquid discharged from the sewer pipe to the earthen impoundments is regulated under RCRA and, thus, that the earthen impoundments are hazardous waste land disposal facilities subject to RCRA.

5. A RCRA permit or RCRA "interim status" is required to own or operate a hazardous waste treatment, storage or disposal facility. Keystone does not have a RCRA permit or "interim status."

6. Section 3005(e)(2) of RCRA, 42 U.S.C. §6925(e)(2), requires hazardous waste land disposal facilities to certify compliance by November 8, 1985 with RCRA regulations concerning groundwater monitoring and financial responsibilty. Keystone has not made these certifications.

7. Keystone has not complied with RCRA's groundwater monitoring requirements. Keystone's current groundwater monitoring measures fall short of what is required by RCRA regulations.

8. Keystone has submitted to the Illinois Environmental Protection Agency ("Illinois EPA") a "closure plan" required by RCRA regulations. The closure plan includes plans for additional groundwater monitoring measures. Illinois EPA is now determining whether these proposed additional measures will be sufficient to meet RCRA requirements.

9. The United States' establishment, for purposes of this motion, of violations of RCRA is an important factor in determining whether or not irreparable harm has been established by the United States.

10. At times, the liquid in Keystone's earthen impoundments has had acidity readings as low as 2 on the pH scale (highly acidic).

11. Samples of liquid taken from the earthen impoundments in 1983 and 1986 showed the presence of some lead and chromium.

12. Keystone's earthen impoundments are unlined. This raises concerns regarding leakage and contamination. Groundwater monitoring conducted to date was not intended to meet and does not meet all RCRA requirements. Nevertheless, that groundwater monitoring has shown no contamination.

13. Keystone expects to cease its discharge to the earthen impoundments by building a pipeline to bypass the impoundments.

14. Keystone's contractor is unable to complete work necessary to cease discharge to the surface impoundments before October 1, 1986.

15. To achieve immediate cessation of the discharge to the earthen impoundments, Keystone would have to cease most plant operations and lay off most of its employees during the interim between such cessation and October 1, 1986.

16. The burden of such a plant closing on Keystone, its employees and the public would be devastating.

17. The adverse effect on Keystone and its employees of an order requiring Keystone's plant to close immediately outweighs any irreparable harm established by the United States. However, the United States has made a showing sufficient to order cessation of discharge by October 1, the date by which Keystone represented it will complete the bypass pipeline.

19. Issuance of this order is consistent with the public interest.

WHEREFORE, the Court orders that:

1. Keystone shall cease its discharge to the earthen impoundments on or before October 1, 1986.

2. If Keystone seeks to extend the above date it shall do so by motion to amend this order.

3. This order is final as of August 29, 1986 for purposes of any appeal.

4. This order does not address the United States' request for other relief, such as additional groundwater monitoring measures and submission and implementation of a proper closure plan. Any such relief will be addressed in a separate order.

5. The Court will hold a telephone status conference concerning Keystone's progress toward cessation of discharge on September 29, 1986 at 4:00 p.m. central daylight time.

September 24, 1986
Date

Michael J. Mihm
Honorable Michael J. Mihm
United States District Judge

Section 721.102(e) Materials that are not solid waste when recycled.

1) Materials are not solid wastes when they can be shown to be recycled by being:

   A. Used or reused as ingredients in an industrial process to make a product, provided the materials are not being reclaimed; or

   B. Used or reused as effective substances for commercial products; or

   C. Returned to the original process from which they are generated, without first being reclaimed. The materials must be returned as a substitute for raw materials feedstock, and the process must use raw materials as principal feedstocks.

2) The following materials are solid wastes, even if the recycling involves use, reuse or return to the original process (described in subsections (e)(1)(A)-(C):

   A. Materials used in a manner constituting disposal, or used to produce products that are applied to the land; or

   B. Materials burned for energy recovery, used to produce a fuel or contained in fuels; or

   C. Materials accumulated speculatively; or

   D. Materials listed in subsection (d)(1).

Section 721.102(f)

Documentation of claims that materials are not solid wastes or are conditionally exempt from regulation. Respondents in actions to enforce regulations implementing Subtitle C of the Resource Conservation Recovery Act or Section 21 of the Environmental Protection Act who raise a claim that a certain material is not a solid waste, or is conditionally exempt from regulation must demonstrate that there is a known market or disposition for the material, and that they meet the terms of the exclusion or exemption. In doing so, they must provide appropriate documentation (such as contracts showing that a second person uses the material as an ingredient in a production process) to demonstrate that the material is not a waste, or is exempt from regulation. In addition, owners or operators of facilities claiming that they actually are recycling materials must show that they have the necessary equipment to do so.

Illinois Environmental Protection Agency · 2200 Churchill Road, Springfield, IL 62706

217/782-5544

April 15, 1985

Certified # P731918118

Refer to: 14300501 -- Peoria County
Bartonville/Keystone Steel and Wire
ILD 000714881

Mr. Dale Bennington
Keystone Steel and Wire Company
7000 South Adams Street
Peoria, Illinois 61641

Dear Mr. Bennington:

The purpose of this letter is to inform you as to the status of the above-referenced facility in relation to the requirements of 35 Ill. Adm. Code, Subparts G and H and the apparent deficiencies identified in Attachments A and B of this letter. The Agency's findings in Attachment A are based on an inspection completed on February 22, 1985. For your convenience, a copy of the inspection report is enclosed with this letter. The Agency's findings in Attachment B are based on an April 3, 1985 review of documents submitted to the Agency to demonstrate compliance with the requirements of Sections 725.243, 725.247 and 725.241.

This Agency shall forward this information to the U. S. Environmental Protection Agency, Region V, for their consideration and inclusion in the pending enforcement action. Your company may respond to these identified deficiencies with a statement of the reasons for the identified deficiencies and a description of any steps taken to correct these deficiencies. Any written response should be sent to the following:

Mark A. Haney, Manager
Facilities Compliance Unit
Compliance Monitoring Section
Illinois Environmental Protection
Agency
Division of Land Pollution Control
2200 Churchill Road
Springfield, Illinois 62706

In addition, any response should include two copies of your revised contingency plan, personnel training records, inspection logs, operating record, closure plan, and waste analysis plan.

If you have any questions regarding the above, please contact Mr. David C. Jansen at 217/786-6892 regarding violations in Attachment A and Mr. Andy Vollmer at 217/782-6762 regarding violations in Attachment B.

Sincerely,

Mark A. Haney, Manager
Facilities Compliance Unit
Compliance Monitoring Section
Division of Land Pollution Control

MAH:CD:jd/0739E/16-17

cc: Division File
Central Region-David Jansen
Jim Rittenhouse, USEPA, Region V
Virginia Yang
Gary King
Andy Vollmer
Cindy Davis

Attachment A

1. Pursuant to 35 Illinois Administrative Code (35 Ill. Adm. Code) 703.150(a) the owner or operator of an existing hazardous waste management facility must submit Part A of the permit application to the Agency no later than the following times, whichever comes first:

    1. Six months after the date of publication of regulations which first require the owner or operator to comply with the standards in 35 Ill. Adm. Code 725; or

    2. Thirty days after the date the owner or operator first becomes subject to the standards in 35 Ill. Adm. Code 725.

    You are in apparent violation of 35 Ill. Adm. Code 703.150(a) in that you have not submitted a Part A for the surface impoundments holding hazardous waste at your facility. These impoundments include the drainage ditch, north and south holding ponds, and the aeration basin. The hazardous waste held by these impoundments is a mixture of spent pickle liquor (K062) and other plant wastewaters. This mixture is defined as hazardous, pursuant to 35 Ill. Adm. Code 721.103(d)(2). In addition, the waste sediments removed from the north and south holding ponds sometime in 1982 are defined as a hazardous waste, pursuant to 721.103(c)(2), and will remain hazardous until the criteria of 721.103(d)(1) and (2) are met. Depending on whether these waste sediments have been disposed of, or are being stored prior to off-site disposal, your Part A must also include notification for a landfill or waste pile, respectively.

2. Pursuant to 35 Ill. Adm. Code 725.190(a) the owner or operator of a surface impoundment, landfill or land treatment facility which is used to manage hazardous waste must implement a groundwater monitoring program capable of determining the facility's impact on the quality of groundwater in the uppermost aquifer underlying the facility, except as Sections 725.101 and 725.190(c) provide otherwise. You are in apparent violation of 725.190(a) in that no groundwater monitoring program has been implemented.

3. Pursuant to 35 Ill. Adm. Code 725.113(b), the owner/operator must have on file at the facility a detailed written waste analysis plan describing the procedures to be used to compile data required under Section 725.113(a). You are in apparent violation of 35 Ill. Adm. Code 725.113(b) since no such plan was present at the site on the date of the inspection.

4. Pursuant to 35 Ill. Adm. Code 725.114(c), the owner/operator must post a sign with the legend, "Danger-Unauthorized Personnel Keep Out" at each entrance to the active portion of the facility and at other locations which can be seen from any approach to this active portion. At the time of the inspection, such signs had not been posted at the entrance to your surface impoundments.

5. Pursuant to 35 Ill. Adm. Code 725.115(b) the owner/operator is to establish and maintain inspection records and schedules which detail records of malfunctions, operator errors, discharges, safety and emergency equipment, security devices, and operating and structural devices. You are in apparent violation of 35 Ill. Adm. Code 725.115(b) for the following reasons: Your written inspection schedule does not address the inspection of the dikes or berms, and freeboard levels of your hazardous waste surface impoundments.

6. Pursuant to 35 Ill. Adm. Code 725.115(d) you must record inspections in an inspection log or summary. These records must, inter alia, include the date and time of inspections made. You are in apparent violation of 725.115(d) in that inspections of the dikes and freeboard levels of the impoundments, and the time of inspections made have not been recorded.

7. Pursuant to 35 Ill. Adm. Code 725.116, the owner/operator is required to establish and maintain records relating to the training of personnel involved in hazardous waste management, including a description of the job title for each position at the site, a written job description and a description of training and records detailing the training given to each such individual. You are in apparent violation of 35 Ill. Adm. Code 725.116 for the following reasons: Job titles, job descriptions and names of employees for each position at the facility related to hazardous waste management were not provided. Only two employees at your facility were so listed. You must also include yourself in these training records, and other personnel at the plant handling hazardous wastes.

   Hazardous wastes handled would include ignitable paint wastes, and spent pickle liquor, in addition to the other hazardous wastes.

8. Pursuant to 35 Ill. Adm. Code 725.152(a) your contingency plan must describe the actions facility personnel must take to comply with 725.151 and 725.156, You are in apparent violation of 725.152(a) in that the contingnency plan is not designed to minimize the hazards to human health or the environment posed by the spent pickle liquor and ignitable paint wastes, pursuant to 725.151(a). In addition, the contingency plan does not describe the actions you will take to comply with 725.156(a), (b), and (c) with respect to your ignitable paint wastes and spent pickle liquor. Further, it does not describe how you will comply with 725.156(d), 725.156(g), (h), (i) and (j), with respect to all of your hazardous wastes.

9. Pursuant to 35 Ill. Adm. Code 725.152(e) the contingency plan must include a list of all emergency equipment at the facility (such as fire extinguishing systems, spill control equipment, communications and alarm systems (internal) and decontamination equipment) where this equipment is required. This list must be kept up to date, and the plan must include the location and a physical description of each item on the list and a brief outline of its capabilities. You are in apparent violation of 725.152(e) in that such a list of all appropriate emergency equipment has not been provided.

10. Pursuant to 35 Ill. Adm. Code 725.152(c) the contingency plan must describe the arrangements agreed to by local police and fire departments, hospitals, contractors, and state and local emergency response teams to coordinate emergency services, pursuant to 725.137. Your contingency plan does not describe these arrangements.

11. Pursuant to 35 Ill. Adm. Code 725.153 copies of the contingency plan must be maintained at the facility, and submitted to all local police and fire departments, hospitals, and state and local emergency response teams that may be called upon to provide emergency services. Such submittals of your plan have not been made.

12. Pursuant to 35 Ill. Adm. Code 725.152(d) your contingency plan must include names, addresses and phone numbers (office and home) of all persons qualified to act as emergency coordinator. Your hazardous waste management plan does not include the home address of the prime emergency coordinator. In addition, the necessary information has not been provided for the alternate emergency coordinators (Mr. Vince Zerbonia and Mr. Elmer Crager).

13. Pursuant to 35 Ill. Adm. Code 725.155 at all times there must be at least one employee either on the facility premises or on call (i.e. available to respond to an emergency by reaching the facility within a short period of time) with the responsibility for coordinating all emergency response measures. This emergency coordinator must be thoroughly familiar with all aspects of the facility's contingency plan, all operations and activities at the facility, the location and characteristics of waste handled, the location of all records within the facility, and the facility layout. In addition this person must have the authority to commit the resources needed to carry out the contingency plan. You are in apparent violation of

35 Ill. Adm. Code 725.155 in that the alternate emergency coordinators, according to their personnel training records, are apparently not thoroughly familiar with all hazardous waste operations, activities, locations, characteristics, and records, and the facility layout. There is no indication that these men are familiar with the hazardous waste surface impoundment operation or the handling of ignitable paint wastes.

14. Pursuant to 35 Ill. Adm. Code 725.173 the owner/operator must keep a written operating record at the facility. The operating record must include the following:

    1. A description and the quantity of each hazardous waste received and the method(s) and date(s) of its treatment, storage or disposal at the facility as required by Appendix I of 35 Ill. Adm. Code 725.173.

    2. The location and quantity of each hazardous waste within the facility including cross-references to specific manifest document numbers.

    3. Records and results of waste analyses and trial tests.

    4. Summary reports and details of all incidents that require implementation of the contingency plan.

    5. Records and results of inspections.

    6. Monitoring and testing data.

    7. All closure cost estimates and for disposal facilities all post-closure cost estimates.

    You are in apparent violation of 35 Ill. Adm. Code 725.173 for the following reasons: the operating record does not include the results of dike and freeboard level inspections, and closure cost estimates.

15. Pursuant to 35 Ill. Adm. Code 725.212(a) you must have a written closure plan for your facility. The plan must meet the requirements of 725.212(a) (1) (2), (3) and (4). You are in apparent violation of 725.212(a) in that you do not have such a closure plan.

16. 35 Ill. Adm. Code, Section 722.134(a) allows for the accumulation of your hazardous waste on site for 90 days or less without a permit or without having interim status provided that:

    1. The waste is placed in containers and you comply with Subpart I of 35 Ill. Adm. Code 725 (use and management of containers) or the waste is placed in tanks and you comply with Subpart J of 35 Ill. Adm. Code 725 (Tanks) except for Subpart 725.293.

    2. You mark on the container the date upon which accumulation of waste begins, such date being visible for inspection.

    3. You mark each container or tank being accumulated on site with the words "Hazardous Waste".

    4. You comply with the requirements of owners and operators of hazardous waste management facilities in Subpart C (Preparedness and Prevention) and D (Contingency Plan and Emergency Procedures) in 35 Ill. Adm. Code 725 and with 35 Ill. Adm. Code 725.116 (Personnel Training).

    On the day of the inspection it was observed that your on site accumulation of hazardous waste for 90 days or less was not in conformance with paragraphs 2, 3, and 4 above, in that;

    1. accumulation dates were not provided on the arc dust containers, and on two barrels of waste 1,1,1-trichloroethane;

    2. the words "Hazardous Waste" were not marked on the arc dust containers;

    3. there were apparent violations of Subpart D, and 725.116 noted during the inspection.

CD:jd/0739E/16-22

Attachment B

1. Failed to provide financial assurance for closure and/or post closure as required by 725.243.

2. Failed to provide liability coverage for sudden accidental occurances as required by 725.247.

3. Failed to provide liability coverage for non-sudden accidental occurances as required by 725.247.

CD:jd/0739E/23

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY MEMORANDUM

DATE: February 22, 1985

TO: Division File

FROM: David C. Jansen

SUBJECT: LPC# 14300501 - Peoria County
Bartonville/KEYSTONE

Keystone Steel and Wire Company's Bartonville plant manufactures steel bars and rods, fence wire and posts, and nails.

Dale Bennington, Environmental Engineer, was interviewed during this inspection. John Tripses and James Jones, DLPC/FOS - Peoria, accompanied me.

Known hazardous wastes generated at this facility include electric arc dust (K061), 1,1,1-trichloroethane still bottoms (F002), spent pickle liquor (K062), and paint sludge (D001).

The arc dust is generated in the electric arc furnace shop in the south east part of the facility. According to the 1983 annual report about 5600 tons of arc dust were generated in 1983 for disposal at Peoria Disposal Company's landfill in Pottstown. The arc dust generated accumulates (shipped twice a week) in truck trailers positioned under the arc dust bag house. The trailers were not marked with the words "Hazardous Waste" or accumulation dates. The special waste hauling permit sticker on the side of each trailer, as well as the sides of each trailer, were totally obscured by black dust. Arc dust was observed on the ground by the trailers, and forming a thin coating over much of the floor and structures in the arc furnace shop. Mr. Tripses stated that as a DAPC field investigator he has on occasion observed arc dust escaping through the roof of the arc shop to atmosphere. Mr. Bennington said that piles of arc dust that accumulate around the trailers are scooped up periodically and placed in the trailers.

1,1,1 - trichloroethane still bottoms are generated from the distillation of spent trichloroethane. The trichlor is used to degrease nails. This waste is stored for 90 days or less in barrels located at the north east end of the mid mill building. 64 drums were in storage. The earliest accumulation date observed on a barrel was 12-10-84. Two barrels did not have accumulation dates marked on their yellow hazardous waste stickers. The last shipment of this waste off-site was on 11-6-84. (see attached manifest). According to the

1983 annual report 8580 gallons (156 drums - 85800 lbs) of this waste were generated in 1983 for disposal at the ESL landfill in Joliet. In touring the nail department where the still bottoms are generated we observed that methylene chloride was also being used for degreasing on an experimental basis. Mr. Bennington said no methylene chloride waste had been generated yet.

Paint sludge was generated from the cleaning of the paint dip tanks located in the fence painting facility. 10 drums of this waste were generated and sent to the Peoria Disposal landfill in Pottstown under Permit #841365 (see attached analysis and manifest). Mr. Bennington said in a phone conversation with me on March 14, 1985 that the recent cleaning of the dip tanks was the first in many years.

We toured the areas where spent pickle liquor is generated in the facility. In one area coils of wire are dipped momentarily into vats of hot sulfuric acid to remove the scale. Spent sulfuric acid is discharged through the plant sewer system to the wastewater treatment facility. About 20,000 gallons of this waste is discharged per day.

We observed wire being galvanized in another area. In this operation wire is ran through a bath of molten lead, then passed through a water bath, and then a hot hydrochloric acid bath. Overflow from this water bath, and spent hydrochloric acid is discharged to the wastewater treatment facility. From the hydrochloric acid bath the wire is passed through a flux of zinc ammonium chloride, through a dryer, and then through a bath of molten zinc. The galvanized wire is given a final water bath and then oiled. The finished wire was a shiny silver color. Overflow from the final water bath is also discharged to the wastewater treatment facility. Lead, zinc ammonium chloride, and zinc wastes generated in the galvanizing process are recycled.

As detailed in the last ISS inspection report a mixture of spent pickling liquor and other plant wastewaters are discharged from an open pipe at the south east part of the facility into an open earthen ditch which flows into the north earthen holding pond. This pond is interconnected with the south earthen holding pond. Pump Station #1 pumps the waste in the south pond to a mixing chamber where it mixes

with Illinois River water pumped from Pump Station #2. This mixture is discharged into an earthen aeration or equalization basin. Pump Station #3 pumps wastewater from the aeration basin to a fiberglass stilling well, and a steel neutralization tank where lime is added. Discharge from the neutralization tank is to north and south concrete sedimentation basins. Effluent from these basins is discharged to the Illinois River under NPDES permit. Sludge from these basins is pumped to north and south earthen sludge lagoons. Effluent from these lagoons is discharged to the Illinois River under NPDES permit. Keystone was granted a temporary exclusion from the hazardous waste list for this sludge, as published in 40 CFR on August 6, 1981. In addition, lime stabilized waste pickle liquor sludge generated by the iron and steel industry was exempted by USEPA from the presumption of hazardousness, effective December 5, 1984.

The mixture of spent pickle liquor and wastewaters exiting the pipe near the north and south holding ponds is defined as a hazardous waste. Keystone does not have interim status or a RCRA permit for the earthen impoundments that are receiving and storing hazardous waste upstream of the neutralization plant. The stilling well, neutralization tank, and concrete sedimentation basins would appear to be exempt from regulation as wastewater treatment units, per 725.101(c)(10). Effluent from the sedimentation basins and sludge lagoons would not be defined as solid wastes, per the point source discharge exemption of 721.104(a)(2).

We toured the wastewater treatment facility. In the treatment building there were multi function alarms for each of the pumphouses. The alarms go off when, in addition to other malfunctions, a high water level is reached in the holding ponds or aeration basin. The high water levels in the ponds and aeration basin that trip the alarms are apparently at least 2 feet below the tops of the berms.

The pH of the influent to and the effluent from the treatment plant is continuously recorded. A daily maintenance log (see attached) is kept by wastewater personnel.

The aeration basin's freeboard during the inspection was about 4 feet along its south edge. The stains from prior levels of wastewater on the south berm of the aeration basin indicated that freeboard in this basin has probably always been at least 2 feet.

The freeboard of the holding ponds was more than 2 feet. At the south edge of the south holding pond there was an emergency overflow pipe about 3 feet above the water level. Mr. Bennington said the pipe was closed off, but when opened the water in the ponds would discharge eventually to the Illinois River. The 2 influent streams discharging to the north holding pond during the inspection were from the wire and mid mill. The influent stream to the south holding pond observed during the inspection was from the steam plant, per Mr. Bennington.

During the inspection of August 19, 1983 I noted that dredged sediments from these holding ponds had been placed in an area just west of the south holding pond. During today's inspection I noted that there was an additional holding pond sediment disposal area north of the area I observed on August 19, 1983. Mr. Bennington said this additional area was not from any dredging after the August 19th inspection. Therefore it appeared that I overlooked this additional area on August 19, 1983. The sediment in this additional area was surrounded by a low berm, and had an orange brown appearance and was sparsely vegetated, as was the other area.

The waste sediments removed from these holding ponds are defined as a hazardous waste, pursuant to 721.103(c)(2). Although these sediments have not shown any characteristics of hazardous waste based on samples taken and analyzed by Keystone on September 14, 1983 and around October 3, 1983, respectively, they remain hazardous pursuant to 721.103(d)(2). Through an oversight this information was not communicated to Keystone in the October 24, 1983 Compliance Inquiry Letter. The disposal and/or storage of the sediments from the holding ponds has not been in accordance with interim status or RCRA permit requirements. I did not determine during the inspection if the sediments have been disposed of, or are being stored prior to disposal elsewhere. Given Keystone's positon that it is not subject to any permit or Part 725 requirements for the impoundments, the issue of whether the holding pond sediments have been disposed of or are being stored may not be resolved until enforcement proceedings are initiated.

Mr. Bennington indicated during the inspection that he could not allow us to take any photographs while we were there. He said that the photographs taken August 19, 1983 should not have been allowed, according to company policy.

I asked Mr. Bennington why Keystone had not included in their 103(c) (Superfund) notification form any information on the spent pickle liquor Keystone discharged to the Illinois River and its backwaters prior to the wastewater treatment plant's construction. I told him that I had some information (see DWPC/FOS memoranda of 11-28-83) that there were sludge deposits about 7 feet deep in the nearby Mud lake area. He replied that they did not include this information because they believed the spent pickle liquor was no longer hazardous after discharge, and that the wastes were no longer on their property.

Sometime in October or November 1984 Keystone security guards discovered 9 old rusty barrels in some brush located east of the former Laidlaw Corporation building. This property is now owned by Keystone. Mr. Bennington had Peoria Disposal Company remove the old barrels and adjacent contaminated soil to PDC's Pottstown landfill (see Special Waste Permit #650101 and 650102, and attached manifest #1141130). The barrels apparently contained waste paint and solvent. Apparently, according to Mr. Bennington, Laidlaw had some painting operations while they were operating at this location. He said Keystone will try to recover their cleanup costs (estimated at $10,000 - see attached invoices) from Laidlaw Corporation. He showed us some photographs of the barrels, and gave me an extra photo showing a rusty barrel with a "Laidlow" (sic) label (see attached). When we inspected the area we noticed that some dried paint-like material remained on the ground. Mr. Bennington said he would have Peoria Disposal pick up these materials.

I reviewed at the facility and at my office at a later date the contingency plan, and personnel training records and documents that Mr. Bennington had prepared to comply with 722.134(a), i.e. the generator accumulation standards, for their 90 day or less storage of hazardous waste containers. Apparent violations observed in these documents are included in the attached report and/or letter. Other apparent violations are also included in the attached report and/or letter.

Also attached to this report are Keystone's Hazardous Waste Management Plan (dated 2-20-85), waste analyses of the Laidlaw drummed waste, and copies of manifests for hazardous wastes recently shipped from Keystone.

DCJ:du

cc: DLPC/FOS - Central Region

LPG# 14300501 - Peoria County
Bartonville/Keystone Steel & Wire co.
STATE IDENTIFICATION NUMBER
(If Applicable)

FOS DIVISION FILE

ILD# 000714881
EPA IDENTIFICATION NUMB

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS
TREATMENT, STORAGE, AND DISPOSAL FACILITIES
Form A - General Facility Standards

I. General Information:

(A) Facility Name: Keystone Steel & Wire Company

(B) Street: 7000 South Adams Street

(C) City: Peoria (D) State: IL (E) Zip Code: 61641

(F) Phone: 309-697-7020 (G) County: Peoria

(H) Operator: Keystone Steel & Wire Company

(I) Street: 7000 South Adams Street

(J) City: Peoria (K) State: IL (L) Zip Code 61641

(M) Phone: 309-697-7020 (N) County: Peoria

(O) Owner: Keystone Consolidated Industries, Inc.

(P) Street: 4835 LBJ Freeway, Suite 300

(Q) City: Dallas (R) State: Texas (S) Zip Code: 75234

(T) Phone: 214-458-0028 (U) County: ———

(V) Date of Inspection: 2-22-85 (W) Time of Inspection (From) 10:15 AM (To) 4:55PM

(X) Weather Conditions: 50°, Rain

Rev. 3-6-81/J.B.

IL 532-0894
LPC 92 12/81

(Y) Person(s) Interviewed	Title	Telephone
Dale Bennington	ENV. ENGINEER	309-697-7020

(Z) Inspection Participants	Agency/Title	Telephone
David C. Jansen	IEPA/EPS III	217/786-6892
John Tripses	IEPA/EPS IV	309-691-2200
James Jones	IEPA/LSCT	309-691-2200

(AA) Preparer Information

Name	Agency/Title	Telephone
David C. Jansen	IEPA/EPS III	217/786-6892

David C. Jansen

II. SITE ACTIVITY:

Complete sections I through VII for all treatment, storage, and/or disposal facilities. Complete the forms (in parenthesis) in section VIII corresponding to the site activities identified below:

x A. Storage and/or Treatment
1. Containers (I)
2. ~~Tanks (J)~~
3. Surface Impoundments (K)
4. Waste Piles (L)

___ B. Land Treatment (M)

___ C. Landfills (N)

___ D. Incineration and/or Thermal Treatment (O and P)

___ E. Chemical, Physical, and Biological Treatment (Q)

Note: If facility is also a generator or transporter of hazardous waste complete sections IX and X of this form as appropriate.

III. GENERAL FACILITY STANDARDS:
(Part 265 Subpart B)

35 Illinois Administrative Code (35 IL. A. C.) Part 725 Subpart B)

	Yes	No	NI*	Remark
(A) Has the Regional Administrator been notified regarding:				
1. Receipt of hazardous waste from a foreign source?				Does not apply (DNA)
2. Facility expansion?				(DNA)
(B) General Waste Analysis:				
1. Has the owner or operator obtained a detailed chemical and physical analysis of the waste?	X			also monitor NPDES effluent
2. Does the owner or operator have a detailed waste analysis plan on file at the facility?		X		
3. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?				DNA
(C) Security - Do security measures include: (if applicable)				
1. 24-Hour surveillance?	X			
OR				
2. Artificial or natural barrier around facility?	X			
AND				
3. Controlled entry?	X			
4. Danger sign(s) at entrance?		X		No sign at WWTP
				- Signs not required at contair storage (90 days or less) are
(D) Do Owner or Operator Inspections Include:				
1. Records of malfunctions?				No malfunctions
2. Records of operator error?				No errors
3. Records of discharges?				No discharges

*Not Inspected

	Yes	No	NI*	Remarks
4. Inspection schedule?	X			Have written "WWTP Daily Maintenance Log"
5. Safety, emergency equipment?	X			Addressed in WWTP Daily Maintenance Log
6. Security devices?	X			Devices inspected & logged by security personnel
7. Operating and structural devices?		X		schedule does not address dikes, freeboard
8. Inspection log?		X		Have deficiencies in WWTP daily maintenance log

(E) Do personnel training records include: (Effective 5/19/81) Required for Generators and TSDs.

1. Job titles?		X		
2. Job descriptions?		X		
3. Description of training?		X		
4. Records of training?		X		
5. Have facility personnel received required training by 5-19-81?	X			Some training provided befo 5-19-81
6. Do new personnel receive required training within six months?	X			

(F) If required are the following special requirements for ignitable, reactive, or incompatible wastes addressed?

1. Special handling?				DNA to wastes in surface impoundments.
2. No smoking signs?				DNA
3. Separation and protection from ignition sources?				DNA

*Not Inspected

IV. PREPAREDNESS AND PREVENTION:
(Part 265 Subpart C)

REQUIRED FOR GENERATORS AND TSDS.

	Yes	No	NI*	Remarks
(A) Maintenance and Operation of Facility:				
Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent?				None documented
(B) If required, does the facility have the following equipment:				- Automatic Alarms in Arc Dust baghouse, and wastewater treatment plant.
1. Internal communications or alarm systems?	X			
2. Telephone or 2-way radios at the scene of operations?				Alarms not considered necessary in barrel storage area. - telephones availab
3. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?	X			Near baghouse, WWTP, Barrel storage area - management personnel equipped with radios

Indicate the volume of water and/or foam available for fire control:

- Numerous extinguishers

- Water tower; city water; 2 wells 160 feet deep that supply mill and engineering dept.

	Yes	No	NI*	Remarks
(C) Testing and Maintenance of Emergency Equipment:				
1. Has the owner or operator established testing and maintenance procedures for emergency equipment?	X			
2. Is emergency equipment maintained in operable conditions?	X			
(D) Has owner or operator provided immediate access to internal alarms? (if needed)	X			

*Not Inspected

(E) Is there adequate aisle space for unobstructed movement?	X			

V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES:
(Part 265 Subpart D)

REQUIRED FOR GENERATORS AND TSDs.

(A) Does the Contingency Plan contain the following information:	Yes	No	NI*	Remarks
1. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.) (§725.151 & 725.156)		X		
2. Arrangements agreed by local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37? (§725.137)		X		
3. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?		X		
4. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?		X		
5. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)				Evacuation Plan Not Consider Necessary.

*Not Inspected

	Yes	No	NI*	Remarks
(B) Are copies of the Contingency Plan available at site and local emergency organizations?		X		
(C) Emergency Coordinator				
1. Is the facility Emergency Coordinator identified?	X			
2. Is coordinator familiar with all aspects of site operation and emergency procedures?		X		
3. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	X			
(D) Emergency Procedures				
If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56? (725.156)				No Occurrences known

VI. MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING
(Part 265 Subpart E)
35 IL. A. C. Part 725 Subpart E

	Yes	No	NI*	Remarks
(A) Use of Manifest System				
(725.171) 1. Does the facility follow the procedures listed in §265.71 for processing each manifest?				DNA
2. Are records of past shipments retained for 3 years?				DNA
(B) Does the owner or operator meet requirements regarding manifest discrepancies?				DNA

*Not Inspected

(C) Operating Record

1. Does the owner or operator maintain an operating record as required in 265.73? (725.173)		~~X~~		See below
2. Does the operating record contain the following information:				
**b. The method(s) and date(s) of each waste's treatment, storage, or disposal as required in Appendix I?	X			Maintaining records under NPDES permit
c. The location and quantity of each hazardous waste within the facility?	X			Have continuous record graph of influent and effluent volumes
***d. A map or diagram of each cell or disposal area showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)				DNA
e. Records and results of all waste analyses, trial tests, monitoring data, and operator inspections?		X		Records of dike & freeboar inspections made not included
f. Reports detailing all incidents that required implementation of the Contingency Plan?				No incidents
g. All closure and post closure costs as applicable? (Effective 5-19-81)		X		No closure cost estimates have been made

** See page 33252 of the May 19, 1980, Federal Register.

*** Only applies to disposal facilities

*Not Inspected

VII. CLOSURE AND POST CLOSURE
(Part 265 Subpart G)

35 IL. A. C. Part 725 Subpart G

	Yes	No	NI*	Remarks
(A) Closure and Post Closure				
1. Is the facility closure plan available for inspection by May 19, 1981?		X		No closure plan
2. Has this plan been submitted to the Regional Administrator		X		
3. Has closure begun?		X		
4. Is closure estimate available by May 19, 1981?		X		
(B) Post closure care and use of property				
Has the owner or operator supplied a post closure monitoring plan? (effective by May 19, 1981)				DNA

VIII. FACILITY STANDARDS
(Part 265, Subparts I thru R)

35 IL. A. C. Part 725, Subparts I thru R

I

USE AND MANAGEMENT OF CONTAINERS

REQUIRED FOR GENERATORS AND TSDS.

Facility Name: Keystone Steel & Wire Date of Inspection: 2-22-85

	Yes	No	NI*	Remarks
1. Are containers in good condition?	X			
2. Are containers compatible with waste in them?	X			
3. Are containers stored closed?	X			
4. Are containers managed to prevent leaks?	X			
5. Are containers inspected weekly for leaks and defects?	X			Trichlor barrels inspected by Dale Bennington
6. Are ignitable & reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive.)	X			- Arc dust trailers inspecte by arc dust supv.

	Yes	No	NI*	Remarks
7. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply.) (35 IL. A. C. 725.117 (b))	___	___	___	DNA
8. Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?	___	___	___	DNA

J
TANKS

Facility Name: _____ Date of Inspection: _____

1. Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank?	___	___	___	_____
2. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structures?	___	___	___	_____
3. Do continuous feed systems have a waste-feed cutoff?	___	___	___	_____
4. Are waste analyses done before the tanks are used to store a substantially different waste than before?	___	___	___	_____
5. Are required daily and weekly inspections done?	___	___	___	_____
6. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)	___	___	___	_____
7. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR 265.17(b) apply.) (35 IL. A. C. 725.117 (b))	___	___	___	_____

*Not Inspected

	Yes	No	NI*	Remarks

8. Has the owner or operator observed the National Fire Protection Association's buffer zone requirements for tanks containing ignitable or reactive wastes?

Tank capacity: _____ gallons

Tank diameter: _____ feet

Distance of tank from property line _____ feet

(See table 2 - 1 through 2 - 6 of NFPA's "Flammable and Combustible Liquids Code - 1977" to determine compliance.)

K
SURFACE IMPOUNDMENTS

Facility Name: Keystone Steel & Wire Date of Inspection: 2-22-85

	Yes	No	NI*	Remarks
1. Do surface impoundments have at least 60 cm (2 feet) of freeboard?	X			
2. Do earthen dikes have protective covers?	X			
3. Are waste analyses done when the impoundment is used to store a substantially different waste than before?				DNA
4. Is the freeboard level inspected at least daily?	X			Inspections not recorded
5. Are the dikes inspected weekly for evidence of leaks or deterioration?	X			Inspections not recorded
6. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a surface impoundment? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)				DNA
7. Are incompatible wastes stored in different impoundments? (If not, the provisions of 40 CFR 265.17(b) apply.) (35 IL. A. C. 725.117 (b))				DNA

L

WASTE PILES

Facility Name: _____ Date of Inspection: _____

	Yes	No	NI*	Remarks
1. Are waste piles covered or protected from dispersal by wind?	---	---	---	---
2. Is each in-coming movement of waste analyzed before being added to the waste pile?	---	---	---	---
3. Are leachate, run-off, and run-on controlled as per the requirements of 265.258? (The effective date of this provision is Nov. 19, 1981.)	---	---	---	---
4. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a pile? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)	---	---	---	---
5. Are piles of reactive or ignitable waste protected from materials or conditions that might cause them to ignite or react?	---	---	---	---
6. Are incompatible wastes stored in different piles? (If not, the provisions of 40 CFR 265.17(b) apply.) (35 IL. A. C. 725.117 (b))	---	---	---	---
7. Are piles of imcompatible waste protected by barriers or distance from other waste?	---	---	---	---

*Not Inspected

M

LAND TREATMENT

Facility Name: _____ Date of Inspection: _____

1. Is treated hazardous waste capable of biological or chemical degradation? --- --- --- ---

2. Are run-off and run-on diverted from the facility or collected? (Effective date: November 19, 1981)? --- --- --- ---

3. Is waste analyzed according to 265.273? (725.373) --- --- --- ---

4. If food chain crops are grown at the facility, has the owner or operator addressed the requirements of 265.276? (725.376) --- --- --- ---

5. Is an unsaturated zone monitoring plan designed and implemented to detect the vertical migration of hazardous waste and provide information on the background concentrations of the hazardous waste available? --- --- --- ---

6. Does the unsaturated zone monitoring plan address the minimum information specified in 265.278? (725.378) --- --- --- ---

7. Are records kept regarding application dates and rates, quantities, and locations, of all hazardous waste placed in the facility? --- --- --- ---

8. Are the special requirements fulfilled regarding land treatment of ignitable or reactive wastes? (Indicate if waste is ignitable or reactive.) --- --- --- ---

9. Are incompatible wastes land treated? (If yes, 265.17(b) applies) (725.117 (b)) --- --- --- ---

N
LANDFILLS

Facility Name: _____ Date of Inspection: _____

	Yes	No	NI*	Remarks
(A) General Operating Requirements Does the facility provide the following:				
**1. Diversion of run-on away from active portions of the fill?	---	---	---	---
**2. Collection of run-off from active portions of the fill?	---	---	---	---
**3. Is collected run off treated?	---	---	---	---
4. Control of wind dispersal of hazardous waste?	---	---	---	---
(**Effective 11-19-81)				
(B) Surveying and Recordkeeping Does the Operating Record Include:				
1. A map showing the exact location and dimensions of each cell?	---	---	---	---
2. The contents of each cell and the location of each hazardous waste type withing each cell?	---	---	---	---
(C) Closure and Post-Closure				
1. Is the Closure Plan available for inspection by 5-19-81?	---	---	---	---
2. Has this plan been submitted to the Regional Administrator?	---	---	---	---
3. Has closure begun?	---	---	---	---
4. Is closure cost estimate available by 5-19-81?	---	---	---	---
(D) Special requirements for ignitable or reactive waste				
Are ignitable or reactive waste treated so the resulting mixture is no longer ignitable or reactive?	---	---	---	---

	Yes	No	NI*	Remarks
(If waste is rendered non-reactive or non-ignitable see treatment requirements)				
If not, the provisions of 40 CFR 265.17(b) apply. (35 IL. A. C. 725.117 (b))	___	___	___	_____
(E) Special Requirements for Incompatible Wastes.				
Does the owner or operator dispose of incompatible wastes in separate cells?	___	___	___	_____
If not, the provisions of 40 CFR 265.17(b) apply. (35 IL. A. C. 725.117 (b))	___	___	___	_____
(F) Special requirements for liquid waste (effective 11-19-81)				
1. Are bulk or non-containerized liquids placed in the landfill?	___	___	___	_____
2. Does the landfill have a chemically and physically resistant liner system?	___	___	___	_____
3. Does the landfill have a functional leachate collection system?	___	___	___	_____
4. Are free liquids stabilized prior to or immediately after placement in the landfill?	___	___	___	_____
(G) Special requirements for Containers (effective 11-19-81)				
Are empty containers crushed flat, shredded, or similarly reduced in volume before being buried beneath the surface of the landfill?	___	___	___	_____

*Not Inspected

O and P
INCINERATION and THERMAL TREATMENT

(A) Facility Name: _____

(B) Date of Inspection: _____

I. Determination of Steady State

A. Type of unit (i.e., type of incinerator or thermal treatment): _____

_____

B. Components and steady state condition:

**** Was this component at SS prior to adding waste

	Component	Yes	No	NI*	Remarks
1.	_____	___	___	___	_____
2.	_____	___	___	___	_____
3.	_____	___	___	___	_____
4.	_____	___	___	___	_____
5.	_____	___	___	___	_____

II. Waste Analysis

A. Minimum requirements, for wastes not previously burned/treated.

		Yes	No	NI*	Remarks
1.	Required analyses; has an analysis been performed for the following?				
	a. Heating value	___	___	___	_____
	b. Halogen content	___	___	___	_____
	c. Sulfur content	___	___	___	_____

*Not Inspected

	Yes	No	NI*	Remarks
2. Has documented or written data been substituted for analysis of either:				
a. Lead?	___	___	___	_____
b. Mercury?	___	___	___	_____

B. List other parameters for which the waste is tested to enable owner or operator to establ steady state or determine the types of pollutants which may be emitted. (Note in Remarks any which you feel should be tested.)

		Remarks
1.	_____	_____
2.	_____	_____
3.	_____	_____
4.	_____	_____
5.	_____	_____

III. Monitoring and Inspections

	Yes	No	NI*	Remarks
A. Are combustion/emission control instruments monitored at least every 15 minutes?	___	___	___	_____
B. Is steady state maintained or corrections attempted?	___	___	___	_____
C. Is stack plume observed at least hourly for normal color and opacity?	___	___	___	_____
D. Did any stack observations made by owner or operator show a plume different than normal?**	___	___	___	_____
E. If yes to D above, were corrections made to return emissions to normal appearance?**	___	___	___	_____
F. Are the complete unit and associated equipment inspected daily for leaks, spills, and fugitive emissions?	___	___	___	_____
G. Are emergency shutdown controls and system alarms checked daily for proper operation?	___	___	___	_____

*Not Inspected
**Specify in Remarks for what period of time this was checked.

IV. Open Burning

A. Only complete this part if the facility open burns hazardous waste.

	Yes	No	NI*	Remarks
1. Does this facility burn only waste explosives? (A No answer means other hazardous waste is open-burned.)	___	___	___	_____
2. If this facility open-burns waste explosives, does it burn the waste at a distance greater than or equal to the minimum specified distance (below)	___	___	___	_____

Pounds of waste explosives or propellants	Minimum distance from open burning or detonation to the property of others	
0 to 100.....	204 m	670 ft
101 to 1,000.....	380 m	1,250 ft
1,001 to 10,000.....	530 m	1,730 ft
10,0001 to 30,000.....	690 m	2,260 ft

Q

CHEMICAL, PHYSICAL and BIOLOGICAL TREATMENT

Facility Name: _____

Date of Inspection: _____

	Yes	No	NI*	Remarks
1. Is equipment used to treat only those wastes which will not cause leakage, corrosion, or premature failure?	___	___	___	_____
2. Is a continuously fed system equipped with a means of hazardous waste inflow stoppage or control (e.g., cut-off system?)	___	___	___	_____

*Not Inspected

	Yes	No	NI*	Remarks
3. Has the owner or operator addressed the waste analysis requirements of 265.402? (725.502)	___	___	___	_____
4. Are inspection procedures followed according to 265.403? (725.503)	___	___	___	_____
5. Are the special requirements fulfilled for ignitable or reactive wastes?	___	___	___	_____
6. Are incompatible wastes treated? (If yes, 265.17(b) applies.) (725.117 (b))	___	___	___	_____

Note: EPA has temporarily suspended the applicability of the requirements of the hazardous waste regulations in 40 CFR Parts 122, 264 and 265 to owners and operators of (1) wastewater treatment tanks that receive, store, and treat wastewaters that are hazardous waste or that generate, store or treat a wastewater treatment sludge which is a hazardous waste where such wastewaters are subject to regulation under Sections 402 or 307(b) of the Clean Water Act (33 U.S.C. 1251 et seq.) and (2) neutralization tanks, transport vehicles, vessels, or containers which neutralize wastes which are hazardous only because they exhibit the corrosivity characteristic under 40 CFR §261.2 or are listed as hazardous wastes in Subpart D of 40 CFR Part 261 only for this reason

IX

Complete this section if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

1. MANIFEST REQUIREMENTS

	Yes	No	NI*	Remarks
(A) Does the operator have copies of the manifest available for review?	X	___	___	_____
(B) Do the manifest forms reviewed contain the following information: (If possible, make copies of, or record information from, manifest(s) that do not contain the critical elements)				
1. Manifest document number?	X	___	___	_____
2. Name, mailing address, telephone number, and EPA ID Number of Generator	X	___	___	_____

	Yes	No	NI*	Remarks
3. Name and EPA ID Number of Transporter(s)?	X			
4. Name, address, and EPA ID Number of Designated permitted facility and alternate facility?	X			
5. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	X			
6. The total quantity of waste(s) and the type and number of containers loaded?	X			
7. Required certification?	X			
8. Required signatures?	X			
(C) Does the owner or operator submit exception reports when needed?				None Needed To Date

2. PRE-TRANSPORT REQUIREMENTS

(A) Is waste packaged in accordance with DOT Regulations? (Required prior to movement of hazardous waste off-site)	X			
(B) Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required to movement of hazardous waste off-site)	X			
(C) If required, are placards available to transporters of hazardous waste?	X			

Omit Section 3 if the facility has interim status and its Part A permit application describes storage

3. On Site Accumulation

	Yes	No	NI*	Remarks
1. Are containers marked with start of accumulation date? and words "HAZARDOUS WASTE"?		X		Arc dust trailers and 2 containers of trichlor without accumulation dates. - Arc dust trailers not labeled "Hazardous Waste".
2. Are the containers of hazardous waste removed from installation before they can accumulate for more than 90 days?	X			
3. Are wastes stored in containers managed in accordance with 40 CFR Part 265.174 and 265.176 (weekly inspections of containers, containers holding ignitable or reactive wastes located at least 15 meters (50 Feet) from facility's property line? (35 IL. A. C. 725.274 and 725.276)	X			
4. If wastes are stored in tanks, are the tanks managed according to the following requirements?				
a. Are tanks used to store only those wastes which will not cause corrosion leakage or premature failure of the tank?				DNA
b. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, dikes, or other containment structures?				DNA
c. Do continuous feed systems have a waste-feed cutoff?				DNA
d. Are required daily and weekly inspections done?				DNA
e. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? (If waste is rendered non-reactive or non-ignitable, see treatment requirements?				DNA
f. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR §265.17(b) apply) (35 IL. A. C. 725.117 (b))				DNA

*Not Inspected

VI. RECORDKEEPING and REPORTING
(Part 262, Subpart D)
35 IL. A. C. Part 722, Subpart D

	Yes	No	NI*	Remarks
(A) Are Manifests, Annual Reports, Exception Reports, and all test results and analyses retained for at least three years?	X			
(B) Has the generator submitted Annual Reports and Exception Reports as required?	X			No TSD annual report submitted

VII. INTERNATIONAL SHIPMENTS
(Part 262, Subpart E)
35 IL. A. C. Part 722, Subpart E

	Yes	No	NI*	Remarks
Has the installation imported or exported Hazardous Waste?		X		

(If answered Yes, complete the following as applicable.)

	Yes	No	NI*	Remarks
1. Exporting Hazardous waste, has a generator:				
a. Notified the Administrator in writing?				
b. Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country?				
c. Met the Manifest requirements?				
2. Importing Hazardous Waste, has the generator:				
Met the manifest requirements?				

*Not Inspected

X

TRANSPORTER REQUIREMENTS
40 CFR Part 263
35 IL. A. C. Part 723

Complete this Section if the owner or operator transports hazardous waste.

I. MANIFEST SYSTEM AND RECORDKEEPING
(Subpart B)

	Yes	No	NI*	Remarks
Are copies of the completed manifests or shipping paper(s) available for review and retained for three years?	___	___	___	_____

II. INTERNATIOINAL SHIPMENTS

	Yes	No	NI*	Remarks
A. Does the transporter record on the manifest the date the waste left the U.S.?	___	___	___	_____
B. Are signed completed manifest(s) on file?	___	___	___	_____

V. MISCELLANEOUS

	Yes	No	NI*	Remarks
A. Does transporter transport hazardous waste into the U.S. from abroad?	___	___	___	_____
B. Does the transporter mix hazardous waste of different DOT shipping descriptions by placing them into a single container?	___	___	___	_____

NOTE: If (A) or (B) were answered "Yes" then the Transporter is also a Generator and must comply with the Generator regulations.

*Not Inspected

REMARKS

Use this section to briefly describe site activities observed at the time of the inspection. Note any possible violations of Interim Status Standards.

STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY
INSPECTION REPORT

USEPA Number: ILD 000714881 IEPA Number: 143 005 0001

Facility Name: Keystone Group Bartonville Plant (Keystone Steel and Wire Co.)

Street: 7000 South Adams
City: Bartonville Telephone: 309/697-7020
County: Peoria State: IL Zip Code: 61641

Type of Facility: Notified As: _____ Regulated As: _____
LDF? yes X no __ HPV? yes __ no __ 90 Day Follow-up Required? yes __ no X

Region: 3 Date of Inspection: 2/23/88 From: 9:00 Am to 3:00 Pm
Weather (LDF Only): 50°F - Cloudy

Type of Inspection
ISS: X Sampling: __ Citizen Complaint: __ Closed: __ Withdrawal: __
Record Review: __ Follow-up to Inspection of _____: __ Other: __

Non Regulated Status
Small Quant. Gen:: __ Claimed Nonhandler: __ Other(Specify in narrative): __

Notified As/Regulated As Matrix Number: ____ Key Letter: ____

Notification date, 8/18/80, from initial __ or subsequent __ notification.

Part A date, 11/18/80, from initial __ or amended __ Part A.

Part B permit application submitted? yes __ no __

Has the firm been referred to: USEPA? yes ✓ no __; IAG? yes __ no ✓; Coun States Attorney? yes __ no ✓. Date of referral to USEPA: 1/8/85, IAG: _____, County States Attorney: _____.

Federal Court Order Issued: _____ State Court Order Issued: _____
(CACO)-USEPA COMPLIANCE ORDER ISSUED: 6/28/85
(CAFO)-USEPA FINAL Order Issued: _____ Illinois PCB Order Issued: _____

TSD Facility Activity Summary

Activity(By Process Code)	On Pt A	Activity Conducted Prior to 1980	Was Activity Ever Done	Closed	Being Done at Time of Inspection	Exempt From Regulation per 35 IAC, Section:	On Annual Report For 86	85	84
S03	yes	yes	Stopped in 1976	1978	No		No	No	N
D80	yes	yes	Stopped in 1976	1978	No		No	No	N
T04	yes	yes	yes	No	yes	703.123(d)	No	No	N
T02	yes	yes	yes	Waste Delisted	No		No	No	N
D83	yes	yes	yes	Waste Delisted	No		No	No	N
S04	No	yes	yes	No	yes		No	No	N

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Operator: Keystone Steel and Wire Co. Telephone #: 309/697-7020

Street: 7000 South Adams

City: Bartonville State: IL Zip Code: 61641

Owner: Keystone Consolidated Industries, Inc. Telephone #: 214/458-0028

Street: 4835 LBJ Freeway, Suite 300

City: Dallas State: TX Zip Code: 75234

Person Interviewed	Title	Telephone #
Dale Bennington	Manager of Energy and Environmental Engineering	309/697-7020
Dave Semelroth	Design Engineer	309/697-7020

Inspection Participants	Agency/Title	Telephone #
John Tripses	IEPA / EPS V	309/693-546[illegible]

Prepared By	Agency/Title	Telephone #
John Tripses *John Tripses*	IEPA / EPS V	309/693-5462

★ - Violations unresolved from previous inspections.

Summary of Apparent Violations

Area	Class	Section		Area	Class	Section		Area	Class	Section
OTH	I	722.134	★	OTH	II	725.152	★			
OTH	I	703.121		OTH	II	725.153	★			
OTH	I	703.150	★	OTH	II	725.155	★			
OTH	I	725.113	★	OTH	II	725.173	★			
OTH	I	725.115	★							
OTH	II	725.116	★							

B

WASTE DISPOSITION FORM

Facility Name: Keystone Steel and Wire USEPA #: ILD000714881 IEPA #: 143 005 0001

Waste Name (Include haz & non-haz special & waste for which no determination has been made)	Generating Process (For waste gen. on site. N/A for TSD)	Date of Last Analysis	USEPA Haz Waste #	On 8700-12 *	On 3510-3 *	On Annual Rpt For 86 *	85 *	84 *	Amount On Site	Rate of Generation gallons month	Last Manifested Shipment	Disposition
Arc Dust	Arc Shop	9/86	K061	Y	Y	Y	Y	Y	3 trailers	12,300	2/19/88	Landfill
1,1,1-Trichloroethane	Nail Degreasing	2/87	F002	N	N	Y	Y	Y	39 barrels	1500	2/11/88	Recycle
Perchloroethylene	General Cleaning	12/86	F001	N	N	Y	N	N	1 barrel	11	2/11/88	Recycle
Waste Oil and Sludge	Fence Department	10/86	D001	N	N	Y	N	N	None	Intermittent Housekeeping	12/17/86	Landfill
Waste Paint	Fence Department	10/86	D001	N	N	Y	N	N	None	56	11/19/87	Incineration
Waste Paint Sludge	Fence Department	10/86	D001	N	N	Y	N	Y	None	78	11/19/87	Incineration
Naptha	Die Cleaning	6/87	D001	N	N	N	N	N	4 barrels	250	2/11/88	Recycle
Waste Oil and Paint Sludge	Fence Department	10/86	D001	N	N	Y	N	N	None	Intermittent Housekeeping	12/17/86	Landfill
Solidified Paint and Tar	Laidlaw Barrel Cleanup	1/85	U220 U239	N	N	N	Y	N	None	One Time	2/8/85	Landfill
Debris + Soil Contaminated with Paint and Tar	Laidlaw Barrel Cleanup	1/85	U220 U239	N	N	N	Y	N	None	One Time	2/8/85	Landfill
Waste Solvent	Laidlaw Barrel Cleanup	1/85	U220 D001	N	N	N	Y	N	None	One Time	12/9/85	Landfill
Waste Chromium Trioxide	Material Purchased and Not Used	11/85	D007	N	N	N	Y	N	None	One Time	12/9/85	Landfill
Waste Gray Paint Sludge	Housecleaning	11/85	D001	N	N	N	Y	N	None	One Time	12/9/85	Landfill
Waste Red Paint	Housecleaning	11/85	D001	N	N	N	Y	N	None	One Time	12/9/85	Landfill
Waste Red Paint Sludge	Housecleaning	11/85	D001	N	N	N	Y	N	None	One Time	12/9/85	Landfill
Waste Oil	Housecleaning	11/85	D001	N	N	N	Y	N	None	One Time	12/9/85	Landfill
Pickle Liquor	Wire Mill		K062	Y	Y	N	N	N	Unknown Ammount		None Shipped	On-Site Treatment

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NARRATIVE

Keystone Steel and Wire Company was inspected on February 23, 1988 by John Tripses, author of this report. Interviewed during the inspection were Dale Bennington, Manager of Energy and Environmental Engineering, and Dave Semelroth, Design Engineer. Keystone manufactures steel bars, rods, fence, posts, and nails. During the manufacturing processes Keystone generates the following wastes.

Arc Dust -(K061):

This waste is generated in the electric arc shop. The shop has two electric arc furnaces. The arc dust is collected through an induced draft system along the roof of the arc shop. The dust is removed from the airstream by a baghouse. The dust is conveyed from the baghouse to a tank. See photograph 10. From the tank it is loaded into roll-off boxes for shipment off site. See photographs 8 and 9. The roll-off boxes (containers) are used to accumulate the waste for less than 90 days. They were not labeled or closed.

1,1,1 - Trichloroethane -(F002):

This waste is generated from the degreasing of nails. At the time of the inspection, there were 17 barrels in the south works accumulation area and 22 barrels in the wire mill accumulation area.

Perchloroethylene -(F001):

This waste is generated in the maintenance shop during the cleaning of parts. One drum was in the wire mill accumulation area.

Naptha -(D001):

This waste is generated in the cleaning of dies. There were 4 barrels in the wire mill accumulation area.

Waste Paint -(D001):

The fence department generates this waste during painting. No waste paint was on site.

These last four wastes are accumulated in containers on site for less than 90 days. Two drums in the wire mill accumulation area were labeled "Hazardous Waste" but did not have accumulation dates. Ten drums in the wire mill accumulation area were not labeled "Hazardous Waste" and did not have accumulation dates. A review of manifests showed shipments of naptha, perchloroethylene, and 1,1,1 - trichloroethane had occurred 22 days prior to this inspection. Photographs 1 and 2 show the south works accumulation area. Photographs 3, 4, 5, 6, and 7 show the wire mill accumulation area. (The barrel in photograph 7 without a bung contained waste oil that was nonhazardous.)

Spent Pickle Liquor -(K062):

This waste is generated in the mid mill and in the wire mill. It flows through a pipe into a holding tank in the mid mill building. the pH is controlled by adding lime. It then flows through a pipe to a wastewater treatment plant where it is further treated. The water is discharged to the Illinois River with an NPDES permit. The sludge from the treatment is stored in two surface impoundments. The sludge (formerly K063) has been delisted. This system is totally enclosed and exempt under 703.123(d). This waste used to go to the mid mill ditch and north holding pond (surface impoundments) before being pumped to the wastewater treatment plant. The mid mill ditch and north holding pond (surface impoundments) still contain sludge from the pickle liquor. Cooling and process waters from the plant are still pumped into them. On October 31, 1986, Keystone quit pumping spent pickle liquor into the ditches. They are the subject of an enforcement case referred to the USEPA.

Keystone is constructing a new treatment building for the spent pickle liquor. The spent pickle liquor will be pumped from the pickling tanks to a 40,000-gallon spent acid storage tank. From the storage tank it is pumped to a 10,000-gallon treating tank. In the treating tank the acid is chilled to 32° F. From the treating tank it is pumped through a centrifuge. Ferrous sulfate heptahydrate crystals are separated from the acid. The acid goes to the recovered acid tank (30,000-gal.). The crystals will be sold. The system has a planned capacity of 30,000-gallons per day. Keystone wants to reduce the amount of pickle liquor that goes to the existing treatment plant to extend the life of the sludge impoundments that receive the effluent of the treatment plant. More information is needed about the intended use of the crystals before a determination of the regulated status of the new treatment system can be made. Keystone believes that this is recycling in Section 721.106(c)(2).

Photographs 11 and 12 show an area that Keystone is cleaning up. The area contained some barrels of unknown material. The material was analyzed and was nonhazardous. The barrels were consolidated and placed in a roll-off box. Soil was also excavated and placed in a roll-off box. The boxes remain on site waiting for disposal permits at Peoria Disposal Company.

During the site tour and review of documents, the following apparent violations were observed:

Section 722.134(a): The facility had not labeled with accumulation dates and/or "Hazardous Waste" 3 trailers containing arc dust (K061) and 12 barrels containing naptha or 1,1,1 - trichloroehtane. The containers of arc dust were open. The facility was not complying with Section 725, Subpart D, and Section 725.116.

Section 703.121:	The facility was storing spent pickle liquor (K062) in a surface impoundment without a RCRA permit.
Section 703.150(a):	The facility was storing spent pickle liquor (K062) in a surface impoundment without a RCRA permit.
Section 725.113(b):	The facility did not have a written waste analysis plan.
Section 725.115(b):	The facility did not have a written inspection schedule.
Section 725.115(d):	The facility did not have an inspection log.
Section 725.116(a):	The facility has not trained all personnel involved in hazardous waste management.
Section 725.116(b):	The facility does not train all personnel involved in hazardous waste management within six months of their date of employment or assignment to a position requiring them to manage hazardous waste.
Section 725.116(c):	The facility has not conducted annual reviews for all personnel involved in hazardous waste management.
Section 725.116(d):	The facility does not have the training documents and records.
Section 725.152(a):	The contingency plan does not describe actions required for release of spent pickle liquor (K062) paint waste (D001), and spent perchloroethylene (F001).
Section 725.152(c):	The contingency plan does not describe arrangements agreed to by local agencies.
Section 725.152(e):	The contingency plan does not include a physical description of and a brief outline of the capabilities of the emergency equipment.
Section 725.153:	The contingency plan has not been submitted to local agencies.
Section 725.155:	The facility has only one emergency coordinator. There is no one to replace him when he is on vacation.

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All of the aforementioned apparent violations except for Section 703.121 were cited in a Compliance Inquiry Letter dated April 15, 1985, based on an inspection completed on February 22, 1985. The apparent violation of Section 703.121 which has not been cited before will be cited in a Compliance Inquiry Letter based upon this report. The Compliance Inquiry Letter will also say that apparent violations from previous inspections remain unresolved.

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Area	C	90 Day F/U	Key Ltr	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
				PART 722 GENERATOR STANDARDS Subpart A: General				
OTH	1		A,D, E,G	Section 722.111 Hazardous Waste Determination	✓			
				Has the generator determined if the solid waste it generates is a hazardous waste? Yes ✓ No ____				
				Did the generator follow the procedures specified in this section in making its determination? Yes ✓ No ____				
			A	Section 722.112 USEPA Identification Number	✓			
			a)	Has the generator obtained a USEPA identification number? Yes ✓ No ____				
			b)	Has the generator offered his hazardous waste only to transporters or to treatment, storage or disposal facilities that have received a USEPA identification number? Yes ✓ No ____				

Area	C	90 Day F/U	Key Ltr Sub Sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
				Part 722 GENERATOR STANDARDS				
			A,D, E,G	Subpart B: The Manifest				
				Section 722.120 Generator Requirements	✓			
			a)	Has the generator who transports; or who offers its hazardous waste for transportation off-site for treatment, storage or disposal prepared a uniform hazardous waste manifest? Yes ✓ No____				
			b)	For hazardous waste going outside Illinois for treatment, storage or disposal, has the generator used the manifest supplied by the Agency if the State to which the hazardous waste is being shipped does not supply and require the completion of its own State manifest? Yes ✓ No____ N/A____				
			c)	For hazardous waste going outside Illinois for treatment, storage or disposal, has the generator used the manifest supplied by and requiring completion by the State to which the hazardous waste is being shipped? Yes ✓ No____ N/A____				
			d)	Did the generator designate on the manifest one facility which is permitted to handle the hazardous waste therein described? Yes ✓ No____ N/A ____				
				Note: The generator may also designate an alternate facility permitted to handle the hazardous waste in the event an emergency prevents delivery of the hazardous waste to the primary designated facility.				

Area	C.	90 Day F/U	Key Ltr Sub Sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
			f)	In any instances where the transporter was unable to deliver the hazardous waste to the designated or alternate permitted facility, has the generator designated another permitted facility or instructed the transporter to return the waste? Yes _____ No _____ N/A ✓				
MAN	2			Section 722.121 Acquisition of Manifests	✓			
			a) or B)	This section reiterates the requirements for generators to use Illinois manifests for hazardous waste going for treatment, storage or disposal in Illinois; or consignment State manifests for wastes going out of State for treatment, storage or disposal unless the consignment State does not supply its own manifest, in which case the generator must use the Illinois manifest. A "No" answer to the second or third question under Section 722.120, General Requirements, also indicates non-compliance with this section.				
MAN	2			Section 722.122 Number of Copies	✓			
				Does the manifest the generator is using consist of at least six copies (plus one copy for each additional transporter)? Yes ✓ No _____				

Area	C	90 Day F/U	Key Ltr Sub Sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
MAN				Section 722.123 Use of the Manifest	✓			
			a)	For each manifest reviewed, has the generator? 1) Signed the certificate by hand? Yes ✓ No ____ 2) Obtained the handwritten signature and the date of acceptance by the initial transporter? Yes ✓ No ____ 3) Retained one copy as required by Section 722.140(a), Record keeping? Yes ✓ No ____ 4) Apparently sent a copy (Part 5 for Illinois manifests) to the Agency within two working days? Yes ✓ No ____				
			b)	Has the generator apparently given the remaining copies of the manifest to the transporter? Yes ✓ No ____				
			c)	Has the generator followed the procedures prescribed in Section 722.123 (c) for manifesting bulk shipments of hazardous waste by water? Yes ✓ No ____ N/A ____				
			d)	Has the generator followed the procedures prescribed in Section 722.123 (d) for manifesting bulk shipments of hazardous waste by rail? Yes ✓ No ____ N/A ____				

Area	C	90 Day F/U	Key Ltr Sub Sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
				Part 722				
				GENERATOR STANDARDS				
			A,D, E,G	Subpart C: Pre-transport Requirements				
				Section 722.130 Packaging	✓			
OTH	1	X		Is waste which is ready for transportation off-site packaged in accordance with 49CFR, Parts 173, 178 and 179? Yes ✓ No ___				
OTH	1	X		Section 722.131 Labeling	✓			
				Is each package of hazardous waste which is ready for transportation off-site labeled in accordance with 49CRR Part 172? Yes ✓ No ___				
OTH	1	X		Section 722.132 Marking	✓			
			a)	Is each package of hazardous waste which is ready for transportation off-site marked in accordance with 49CFR Part 172? Yes ✓ No ___				
			b)	Is each package of hazardous waste which is ready for transportation off-site marked in accordance with:				
				- The generator's name and address? Yes ✓ No ___				
				- The manifest document number associated with the container? Yes ✓ No ___				

Area	C.	90 Day F/U	Key Lee Sub Sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
				- The words "Hazardous Waste - Federal Law Prohibits Improper Disposal. If found contact the nearest police, or public safety authority or the U.S. Environmental Protection Agency"? Yes ✓ No ____				
OTH	1			Section 722.133 Placarding Does the generator have, for the waste it generates, the proper placards to: - Placard the transport vehicle, or - Offer to the first transporter, according to 49CFR, Part 172, Subpart F? Yes ___ No ___	✓			
OTH	1	X		Section 722.134 Accumulation Time Has the generator (who is not a small quantity generator in compliance with the requirements in Section 721.105) only accumulated hazardous waste on site for periods of 90 days or less? Yes ✓ No ____ Note: If the answer is "Yes", complete the following questions. If the answer is "No", and there is more than 1000 kg (one kg of accute hazardous waste or 100 kg of any residue or contaminated soil, waste or other debris resulting from the clean up of a spill, into or on any land or water, of any accute hazardous waste listed in Sections 721.121, 721.132 or 721.133 (e)) the firm is a storage facility. Complete the TSD inspection form, unless the generator has requested and has been granted an extension as provided for in Section 722.134 (b).		✓		

Area	C.	90 Day F/U	Key Ltr Sub Sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
			a)1)	For waste in containers, has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subpart I: Use and Management of Containers? Yes ___ No ✓ N/A ___ Note: Complete pages TSD-I-1 and 2 concerning container storage prior to answering this question.				Containers of arc dust were open. See photographs 8 and 10.
			a)1)	For waste in tanks, has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subpart J: Tanks except for Section 725.293, Closure? Yes ___ No ___ N/A ✓ Note: Complete pages TSD-J-1 thru 5 concerning tank storage prior to answering this question.				
			a)2)	For waste in containers, has the generator marked and made visible for inspection on each container, the date upon which accumulation began? Yes ___ No ✓ N/A				The trailers containing arc dust were not labeled "Hazardous Waste" or dated.
			a)3)	For waste in containers and tanks, has the generator marked or labeled each with the words "Hazardous Waste"? Yes ___ No ✓				[redacted] Drums in the wire mill accumulation area did not have the proper labels or dates. 2 drums had labels without dates. 10 drums were without labels and dates.
			a)4)	Has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subpart C: Preparedness and Prevention? Yes ✓ No ___ Note: Complete pages TSD-C-1 thru 4 concerning preparedness and prevention prior to answering this question.				
			a)4)	Has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subpart D: Contingency Plan and Emergency				

Area	C	90 Day F/U	Key Ltr Sub Sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
				Procedures? Yes ___ No ✓				
				Note: Complete pages TSD-D-1 thru 5 concerning contingency plan and emergency procedures prior to answering this question.				
			a)4)	Has the generator complied with the requirements of 35 Ill. Adm. Code 725.116, Personnel Training? Yes ___ No ✓				
				Note: Complete pages TSD-B -8 thru 10 concerning personnel training prior to answering this question.				
				Note: In inspections at firms whose key letters are A or D, include the TSD inspection form pages indicated above for subsection a)1) and a)4) with the generator inspection form. If the key letters are either E or G, these pages will be included in the TSD inspection form and need not be repeated in this portion.				
				Any violations noted in completing the aforementioned pages from the TSD inspection form at firms whose key letters are A and D are violations of only the requirements in Section 722.134, not the requirements of Part 725.				
			c)1)	Is the generator who accumulates hazardous waste in containers at or near any point of generation where wastes initially accumulate and which is under the control of the operator of the process generating the waste:				

Area	C.	90 Day F/U	Key Ltr Sub Sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
				- Limiting such accumulation to 55 gallons (one quart of acutely hazardous waste listed in 35 Ill. Adm. Code 721.133)? Yes ✓ No ____ N/A ____ - Complying with the requirements of: 1) 35 Ill. Adm. Code 725.271, Condition of Containers? Yes ✓ No ____ N/A ____ 2) 35 Ill. Adm. Code 725.272, Compatibility of Waste with Containers? Yes ✓ No ____ N/A ____ 3) 35 Ill. Adm. Code 725.273(a), Management of Containers - requiring that the containers be stored closed except when waste is being added or removed? Yes ✓ No ____ N/A ____ - Marking the containers with the words "Hazardous Waste" or with other words that identify the containers? Yes ✓ No ____ N/A ____				
			c)2)	Has the generator who accumulates more than 55 gallons (one quart of acutely hazardous waste listed in 35 Ill. Adm. Code 721.133 (e)) with respect to the amount of excess waste, complied with the requirements in Section 722.134(a) within three days? Yes ____ No ____ N/A ✓				

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Area	C.	90 Day F/U	Key Ltr Sub Sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
			c)2)	Are the containers with the excess amounts marked with the date accumulation began? Yes _____ No _____ N/A ✓				
			c)2)	During the three day period, is the generator continuing to comply with the requirements of Section 722.134(c)(1)? Yes _____ No _____ N/A ✓				

Area	C.	90 Day F/U	Key Ltr Sub Sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
				Part 722				
				GENERATOR STANDARDS				
			A,D, E,G	Subpart D: Record keeping and Reporting				
OTH	2			Section 722.140 Recordkeeping Has the generator retained for a period of three years:	✓			
			a)	- A copy of each signed manifest? Yes ✓ No___				
			b)	- A copy of each annual report? Yes ✓ No___				
			b)	- A copy of each exception report? Yes ___ No___				No exception reports
			c)	- Copies of test results, waste analyses or other determinations made in accordance with Section 722-111? Yes ✓ No___				
			d)	Does a generator who is involved in any unresolved enforcement action continue to maintain the records required in 722.140 (a) thru (c)? Yes ___ No___ N/A ✓				
			d)	If the Director has requested that the records required in 722.140 (a) thru (c) be maintained for a period longer than three years, has the generator continued to maintain them? Yes ___ No___ N/A ✓				
OTH	2			Section 722.141 Annual Reporting	✓			
			a)	Has the generator who ships waste off-site prepared and submitted a copy of an annual report, as supplied by the Agency, to the Agency by March 1, for the preceeding calendar year? Yes ✓ No___				

Area	C	90 Day F/U	Key Ltr Sub Sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
			a)	Does the annual report include a description of: - The efforts undertaken during the year to reduce volume and toxicity of waste generated? Yes ✓ No ____ N/A ____ - The changes in volume and toxicity of waste actually achieved during the year in comparison to previous years to the extent such information is available for years prior to 1984? Yes ✓ No ____ N/A ____ Note: The above descriptions will be required on annual reports for calendar year 1986 and later. Note: A generator who treats, stores or disposes of hazardous waste on-site must submit an annual report as a TSD in accordance with the requirements of 35 Ill. Adm. Code 702, 703, 724, 725 and 40 CFR 266.				
MAN	1			Section 722.124 Exception Reporting	____	____	✓	
			a)	Has the generator who has not received a signed copy of the manifest from the designated TSD within 35 days of the date the waste was accepted by the initial transporter determined the status of its hazardous waste? Yes ____ No____				

Area	C.	90 Day F/U	Key Ltr Sub Sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
			b)	Has the generator who has not received a signed copy of the manifest from the designated TSD within 45 days of the date the waste was accepted by the original transporter submitted an exception report to the director? Yes _____ No_____				
			b)	Does any exception report submitted to the Director contain the following? - A legible copy of the manifest for which the generator does not have confirmation of delivery, and - A cover letter signed by the generator or his authorized representative explaining the efforts taken to locate the hazardous waste and the results of those efforts? Yes ___ No ____ N/A ___				
OTH	1			Section 722.143 Additional Reporting Has the generator submitted all additional reports concerning quantities and disposition of wastes as required by the Director? Yes ____ No ____	____	____	✓	

Area	C.	90 Day F/U	Key Ltr Sub Sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
				Part 722				
				GENERATOR STANDARDS				
			A,D, E,G	Subpart E: Special Conditions				
OTH	1			Section 722.150 International Shipments	___	___	✓	No international shipments.
			b)1)	Has the generator notified the Administrator and Agency, in writing, four weeks before the initial shipment of hazardous waste to each country in each calendar year? Yes ___ No ___ N/A ___				
			b)1)	Does the notice include the following? - The waste identification by its USEPA hazardous waste identification number and its DOT shipping description and, - The name and address of the foreign consignee? Yes ___ No ___				
			b)2)	Has the generator received confirmation, in writing, from the foreign consignee that the waste had been delivered? Yes ___ No ___ Note: A copy of the manifest signed by the foreign consignee may be used for this purpose.				
			b)3)	Has the generator met the manifest requirements of Section 722.120 except that: - In place of the name, address, and USEPA identification number of the designated facility, the name and				

Area	C	90 Day F/U	Key Ltr Sub Sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
				address of the foreign consignee is used, and - The generator identifies the point of departure from the United States, that the waste must travel before entering a foreign country? Yes ____ No ____				
			b)4)	Is the generator using manifests obtained from the Agency for its international shipments? Yes ___ No ____ N/A ____				
			c)1)	Has the generator filed an exception report if it has not received a signed copy of the manifest from the transporter stating the date and place of departure of the waste from the United States within 45 days of the date the waste was accepted by the transporter? Yes ___ No____ N/A _____				
			c)2)	Has the generator filed an exception report if it has not received written confirmation from the foreign consignee of the arrival of the waste within 90 days of the date the waste was accepted by the initial transporter? Yes ___ No ____ N/A ____				
			d)	Has the person exporting hazardous waste filed with the Administrator and the Agency, no later than March 1 of each year, a report summarizing the types, quantities, frequency and ultimate destination of all such hazardous waste exported during the previous calendar year? Yes ___ No ____ N/A ____				

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Area	C.	90 Day F/U	Key Ltr Sub Sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
			e)1)	Has the person importing hazardous waste met the manifest requirements of Section 722.120 except that: In place of the generator's name, address and USEPA identification number, the name and address of the foreign generator and the importer's name, address and USEPA identification number are used.				
			e)2)	Has the importer or his agent signed the manifest in place of the generator? Yes ___ No ___ N/A ___				
			e)2)	Has the importer or his agent obtained the signature of the initial transporter? Yes ___ No ___ N/A ___				
			f)	Is the person importing hazardous waste using manifests obtained from the Agency? Yes ___ No ___ N/A ___				
OTH	2	X		Section 772.151 Farmers Is a farmer who is disposing of waste pesticides from his own use which are hazardous wastes: - Triple rinsing each emptied pesticide container in accordance with 35 Ill. Adm. Code 727.107 (b)(3), Residues of Hazardous Waste in Empty Containers? Yes ___ No ___ N/A ___	___	___	✓	

Area	C	90 Day F/U	Key Ltr Sub Sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
				- Disposing of pesticide residue on his own farm in a manner consistent with the disposal instructions on the pesticide label? Yes ___ No ____ N/A ____ Note: If the answer to either of the preceeding questions is "No", the farmer is subject to the requirements of this Part (722) and to the applicable portions of 35 Ill. Adm. Code 702, 703 and 725 (724). Complete the applicable inspection form(s).				

Area	C	90 Day F/U	Key Ltr Sub Sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
				Part 723				
				STANDARDS APPLICABLE TO TRANSPORTERS OF HAZARDOUS WASTE				
				Subpart A: General				
				Section 723.110 Scope				
				Has the firm ever transported hazardous waste into the United States from abroad? Yes ____ No ____				
				Has the firm ever mixed hazardous wastes of different DOT shipping descriptions by placing them into a single container? Yes ____ No ____				
				Note: A "Yes" answer to either of these questions means the transporter is also a generator of hazardous waste subject to the requirements of Part 722. Complete the generator inspection form.				
OTH	1		B	Section 723.111 USEPA Identification Number	____	____		
				Has the transporter obtained a USEPA identification number? Yes ____ No____				
OTH	1	X	B,D, F,G	Section 723.112 Transfer Facility Requirements	____	____		
				Has a transporter of hazardous waste stored manifested shipments of such waste:				
				- For a period of 10 days or less? Yes____ No.____				

Area	C.	90 Day F/U	Key Ltr Sub Sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
				Part 703				
				RCRA PERMIT REPORT				
			C,E, F,G	Subpart B Prohibitions				
OTH	1			Section 703.121 RCRA Permits	___	✓		
			a)	Is any persons conducting any hazardous waste storage, hazardous waste treatment or hazardous waste disposal operation doing so only:				
				1) With a RCRA permit for the HWM facility? Yes ___ No ✓				
				2) In conformance with all conditions imposed by the RCRA permit? Yes ___ No ___				
			b)	Do the owner and operator of hazardous waste management units have permits during the active life of the unit (including the closure period)? Yes ___ No ✓				
			b)	Do the owners and operators of any hazardous waste unit which closed after January 26, 1982, have a permit during any post-closure period required under 35 Ill. Adm. Code 724.217 Post Closure Care and Use of Property and during any compliance period or any extension of that compliance period specified under 35 Ill. Adm. Code 724.196, Compliance Period? Yes ___ No ___ N/A ✓				

Area	Cr	90 Day F/U	Key Ltr Sub Sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
				Part 703				
				RCRA PERMIT PROGRAM				
			C,E, F,G	Subpart C Authorization by Rule and Interim Status				
OTH	1			Section 703.150 Application by Existing HWM Facilities and Interim Status Qualifications		✓		
			a)	Has the owner or operator of an existing HWM facility or of an HWM facility in existence on the effective date of satutory or regulatory amendments that render the facility subject to the requirement to have a RCRA permit submitted Part A of the permit application to the Agency no later than the following times, whichever comes first: 1) Six months after the date of publication of regulations which first require the owner or operator to comply with standards in 35 Ill. Adm. Code 725? Yes ___ No ✓ N/A ___				

Area	C.	90 Day F/U	Key Ltr Sub Sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
OTH	1			Section 703.152 Amended Part A Application	___	___	✓	
				Has the owner or operator of an HWM with interim status filed an amended Part A permit application with the Agency:				
			a)1)	1) No later than the effective date of revised regulations under 35 Ill. Adm. Code, 721, Identification and Listing of Hazardous Waste, listing or identifying additional hazardous waste which the HWM facility is handling? Yes ___ No ___ N/A ___				
			a)2)	2) As necessary to comply with the provisions of Section 703.155, Changes During Interim Status? Yes ___ No ___ N/A ___				
				Note: The owner or operator of a facility who fails to comply with the updating requirements of this section does not receive interim status as to the wastes not covered by duly filed Part A applications.				
OTH	1			Section 703.154 Prohibitions During Interim Status	___	___	✓	The facility does not have interim status.
				During interim status has the facility refrained from:				
			a)	- Treating, storing or disposing of hazardous waste not specified in Part A of the permit application? Yes ___ No ___				

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Area	C.	90 Day F/U	Key Ltr	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
				- Employing processes not specified in Part A of the permit application? Yes ___ No ___				
				- Exceeding the design capacities specified in Part A of the permit application? Yes ___ No ___				
OTH	1			Section 703.155 Changes During Interim Status	___	___	✓	
			a) b) or c)	Note: Section 703.155 (a) (b) and (c) reiterate in more detail the requirement that a HWM facility submit and, in the case of (b) and (c) that the Agency approve, amendments to the Part A permit application prior to the facility conducting the activity or receiving new hazardous waste. A "No" answer to any of the questions under Section 703.154 means the facility is also in apparent non-compliance with this section.				
			d)	Did the owner or operator submit a revised Part A permit appication not later than 90 days prior to changes in operational control or ownership of the HWM facility? Yes ___ No ___ N/A ____				
OTH	1			Section 703.156 Interim Status Standards	___	___	✓	
				Is the owner or operator complying with all interim status standards of 35 Ill. Adm. Code 725? Yes ___ No ___				
				Note: Complete the applicable portions of the TSD inspection form prior to answering the above questions.				

Area	C.	90 Day F/U	Key Ltr Sub Sec.	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
				Part 725				
				INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES				
			C,E F,G	Subpart A General Provisions				
OTH	1			Section 725.101 Purpose, Scope And Applicability	___	___	✓	
			d)	Has the firm managed hazardous waste with the following hazardous waste numbers: F020, F021, F022, F023, F026 or F027 in compliance with the requirements of 725.101 (d)? Yes ___ No ___				

Area	Cl	90 Day F/U	Key Ltr	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
				Part 725				
				INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES				
			C,E, F,G	Subpart B — General Facility Standards				
OTH	I			Section 725.111 — USEPA Identification Number	✓			
				Has the facility obtained a USEPA identification number? Yes ✓ No ___				
				Section 725.112 — Required Notices			✓	The facility does not receive wastes from foreign sources.
			a)	Has the owner or operator of a facility that has arranged to receive hazardous waste from a foreign source notified the Regional Administrator, in writing, at least four weeks in advance of the date that the waste is expected to arrive at the facility? Yes ___ No ___ N/A ___				
			b)	Before transferring ownership or operation of a facility during its operating life, or of a disposal facility during the post-closure care period; did the owner or operator notify the new owner or operator, in writing, of the requirements of 35 Ill. Adm. Code 702, 703 and 725? Yes ___ No ___ N/A ___				
OTH	I			Section 725.113 — General Waste Analysis		✓		
			a)1)	Has the owner or operator of the facility obtained a detailed chemical analysis of each waste prior to its treatment, storage or disposal? Yes ✓ No ___				

Area	Cr	90 Day F/U	Key Ltr	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
			a)1)	Does the analysis contain all the information which must be known to treat, store or dispose of the waste in accordance with this Part? Yes ✓ No ___				
				Has the analysis been repeated:				
			a)3)	A) When the operator is notified or has reason to believe that the process generating the hazardous waste has changed? Yes ✓ No ___ N/A ___				
			a)3)	B) By off-site facilities, when the results of the inspection required in Section 725.113 (a)(4) indicate that the hazardous waste received at the facility does not match the waste designated odn the accompanying manifest or shipping paper? Yes ___ No ___ N/A ✓				
			a)4)	Has the owner or operator of an off-site facility apparently inspected each hazardous waste movement received at the facility to determine whether it matches the identity of the waste specified on the accompanying manifest or shipping paper? Yes ___ No ___ N/A ✓				
			b)	Has the owner or operator developed a written waste analysis plan? Yes ___ No ✓				
			b)	Is the written waste analysis plan available at the facility? Yes ___ No ✓				The facility does not have a waste analysis plan.
			b)	Does the owner or operator follow the procedures in the written plan so as to comply with the requirements in Section 725.113 (a)? Yes ___ No ✓				

Area	CA	90 Day F/U	Key Ltr Sub Sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
			b)	Does the plan specify: 1) The parameters for which each hazardous waste will be analyzed and the rationale for the selection of these parameters? Yes ___ No ✓ 2) The test methods which will be used to test for those parameters? Yes ___ No ✓ 3) The sampling method which will be used to obtain a representative sample of the waste to analyzed? Yes ___ No ✓ 4) The frequency with which the initial analysis of the waste will be reviewed or repeated to ensure that the analysis is accurate and up-to-date? Yes ___ No ✓ 5) For off-site facilities, the waste analyses that hazardous waste generators have agreed to supply? Yes ___ No ___ N/A ✓ 6) The methods which will be used to meet the additional analysis requirements for specific waste managment methods as specified in Sections: - 725.293 (Tanks); - 725.325 (Surface Impoundments); - 725.352 (Waste Piles); - 725.373 (Land Treatment); - 725.414 (Incinerators); - 725.475 (Thermal Treatment); - 725.502 (Chem. Phys. Bio. Treat.) Yes ___ No ✓ N/A ___				

Area	Cr	90 Day F/U	Key Ltr	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
				Note: Circle the specific waste management methods being employed.				
			c)	For off-site facilities, does the plan:				
				1) Describe the procedures which will be used to determine the identity of each movement of waste managed at the facility? Yes ___ No ___ N/A ✓				
				2) Describe the sampling methods which will be used to obtain a representative sample of the waste to be identified, if the identification method includes sampling? Yes ___ No ___ N/A ✓				
OTH	1	X		Section 725.114 Security	✓			
				Does the facility qualify fo the exemption to the requirement to provide security provided in Section 725.114 (a)? Yes ___ No ___				
			b)1)	Does a non-exempt facility have either:				
				1) A 24-hour surveillance system which continuously monitors and controls entry into the active portion of the facility? Yes ✓ No ___				
				2) An artificial or natural barrier which completely surrounds the active portion of the facility and a means to control entry at all times thru the gate(s) or other entries to the active portion of the facility? Yes ✓ No ___				

Area	Cx	90 Day F/U	Key Ltr	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
			c)	Does a non-exempt facility have a sign, legible from a distance of at least 25 feet, with the words "Danger - Unauthorized Personnel Keep Out" at each entrance to the active portion of the facility and at other locations in sufficient numbers to be seen from any approach to the active portion? Yes ✓ No ___ Note: Existing signs with legends other than the one above may be used if the legend on the sign indicates only authorized personnel are allowed to enter the active portion and that entry onto the active portion can be dangerous.				

Area	C.	90 Day F/U	Key Ltr	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
OTH	2			Section 725.115 General Inspection Requirements		✓		
			a)	Does the owner or operator inspect the facility for malfunctions, deterioration, operator errors and discharges which are causing or may lead to: 1) Release of hazardous waste or hazardous waste constituents to the environment; or 2) A threat to human health? Yes ✓ No ___				
			a)	Does the owner or operator conduct these inspections often enough to identify problems in time to correct them before they harm human health or the environment? Yes ✓ No ___				
			b)1)	Has the owner or operator developed a written schedule for inspecting all monitoring equipment, safety and emergency equipment, security devices and operating and structural equipment important to preventing, detecting or responding to environmental or human health hazards? Yes ___ No ✓				The facility does not inspect the surface impoundments.
			b)2)	Is the written schedule at the facility? Yes ✓ No ___				
			b)3)	Does the schedule identify the types of problems which are to be looked for during the inspection? Yes ✓ No ___				
			b)4)	Does the schedule specify at least the following minimum inspection frequency:				

Area	Cr	90 Day F/U	Key Ltr	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
				- Daily inspections of areas subject to spills? Yes ✓ No ___				
				- The items and frequencies, where applicable, called for in Sections:				
				- 725.274 (Containers);				
				- 725.294 (Tanks);				
				→ - 725.326 (Surface Impoundments);				
				- 725.447 (Incinerators);				
				- 725.477 (Thermal Treatment);				
				- 725.503 (Chem. Phys. Bio. Treat.) Yes ___ No ✓ N/A ___				
				Note: Circle the applicable section.				
			c)	Has the owner or operator remedied any deterioration or malfunction of equipment or structures which the inspections reveal on a schedule which ensures that the problem does not lead to an environmental or human health hazard? Yes ✓ No ___				
			c)	Where a hazard is imminent or has already occurred, has the owner or operator taken immediate action to resolve the problem? Yes ✓ No ___ N/A ___				
			d)	Does the owner or operator record the results fo inspections in a log or summary? Yes ___ No ✓				
			d)	Does the inspection record include"				
				- The date and time of the inspection? Yes ___ No ___				No inspection records.
				- The name of the inspector? Yes ___ No ___				

Area	[illegible]	90 Day F/U	Key Ltr	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
				- A notation of the observations made? Yes ___ No ___				
				- The date and nature of any type of corrective action? Yes ___ No ___. N/A ___				
OTH	2			Section 725.116 Personnel Training	___	✓		
			a)1)	Have facility personnel who are involved with hazardous waste managment successfully completed a program of classroom or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the requirements of this Part? Yes ___ No ✓				Only supervisors in the steel works have been trained
			a)1)	Is the training program formalized, i.e. written down? Yes ✓ No ___				
			a)2)	Is the program directed by a person who has been trained in hazardous waste management procedures? Yes ✓ No ___				
			a)3)	Does the program cover, at a minimum:				
				A) Procedures for using, inspecting, repairing and replacing facility emergency and monitoring equipment? Yes ✓ No ___ N/A ___				
				B) Key parameters for automatic waste feed cutoff systems? Yes ___ No ___ N/A ✓				
				C) Communications or alarm systems? Yes ✓ No ___ N/A ___				
				D) Response to fire or explosion? Yes ✓ No ___ N/A ___				

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Area	C.	90 Day F/U	Key Ltr	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
				E) Response to ground water contamination incidents? Yes ___ No ___ N/A ✓				
			a)3)	Does the program cover the implementation of the contingency plan? Yes ✓ No ___				
			b)	Have new employees completed the program within six months of the date of employment or assignment to a position requiring them to manage hazardous waste? Yes ___ No ✓ N/A ___				
			c)	Has the facility conducted an annual review of the initial training? Yes ___ No ✓ N/A ___				
			d)	Are the following documents and records being maintained at the facility:				
				1) The job title for each position related to the management of hazardous waste and the name(s) of the employee(s) filling each job? Yes ___ No ✓				Facility has training documents for supervisors who have been trained.
				2) A written job description for each job position above, to include the requisite skill, education or other qualifications and duties of personnel assigned to each position? Yes ___ No ✓				
				3) A written description of the type and amount of both initial and continuing training that will be given to each person holding a position dealing with hazardous waste management? Yes ___ No ✓				

Area	C	90 Day F/U	Key Ltr	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
				4) Records to document that the training or job experience have been given to and completed by personnel dealing with hazardous wastes management? Yes ___ No ✓				
			e)	Is the facility maintaining training records of former employees who were involved in hazardous waste management for a period of at least three years? Yes ✓ No ___ N/A ___				
OTH	1	X		Section 725.117 General Requirements for Ignitable, Reactive or Incompatible Wastes	✓			
			a)	Are ignitable and reactive wastes protected from and separated from sources of ignition and reaction? Yes ✓ No ___				
			a)	Are smoking and open flames restricted to specially designated areas when ignitable or reactive waste is being handled? Yes ✓ No ___				
			a)	Are "No Smoking" signs posted whenever there is a hazard from ignitable or reactive waste? Yes ✓ No ___				
			b)	Is the treatment, storage or disposal of ignitable or reactive waste and the mixture or comingling of incompatible wastes and materials being done so that it does not:				
				1) Generate extreme heat or pressure, fire, or explosion or violent reaction? Yes ✓ No ___				

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Area	C	90 Day F/U	Key Ltr	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
				2) Produce uncontrolled toxic mists, fumes, dusts or gases in sufficient quantities to threaten human health? Yes ✓ No ___				
				3) Produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosion? Yes ✓ No ___				
				4) Damage the structural integrity of the device or facility containing the waste? Yes ✓ No ___				
				5) Through other like means threaten human health or the environment? Yes ✓ No ___				
				Section 725.118 Location Standards			✓	
				Has the facility placed hazardous waste in a salt dome, salt bed formation, underground mine or cave after July 11, 1986? Yes ___ No ___				
				Note: A "Yes" answer is a violation of the location standard.				

Area	C	90 Day F/U	Key Ltr	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
				Part 725				
				INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES				
			A D C,E, F,G	Subpart C Preparedness and Prevention				
OTH	1	X		Section 725.131 Maintenance and Operation of Facility	✓			
				Is the facility being maintained and operated to minimize the possibility of a fire, explosion or any unplanned and *sudden or non-sudden release of hazardous* waste or hazardous waste constituents to: - Air - Soil, or - Surface water, which would threaten human health or the environment? Yes ✓ No___				
OTH	1	X		Section 725.132 Required Equipment	✓			
				Is the facility equipped with the following, unless none of the hazards posed by waste handled at the facility could require a particular kind of equipment:				
			a)	_ An internal communications or alarm system capable of providing immediate emergency instructions? Yes ✓ No ___ N/A ___				

Area	C	90 Day F/U	Key Ltr / Sub-sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
			b)	- A device such as a telephone (immediately available at the scene of operations) capable of summoning emergency assistance from local police or fire departments or State or local emergency response teams? Yes ✓ No ___ N/A ___				
			c)	- Portable fire extinguishers, fire control equiment, spill control equipment and decontamination equipment? Yes ✓ No ___ N/A ___				
			d)	- Water at adequate volume and pressure to supply water hose streams or foam producing equipment or automatic sprinklers or water spray systems? Yes ✓ No ___ N/A ___				
				Note: Any "N/A" answers must be explained in the Remarks column.				
OTH	1	X		Section 725.133 Testing and Maintenance of Equipment	✓			
				Where required, is the facility testing and maintaining, as necessary, to assure proper operation in time of emergency:				
				- Communications/alarm systems? Yes ✓ No ___ N/A ___				
				- Fire protection equipment? Yes ✓ No ___ N/A ___				
				- Spill control equipment? Yes ✓ No ___ N/A ___				
				- Decontamination equipment? Yes ✓ No ___ N/A ___				

Area	C.	90 Day F/U	Key Ltr / Sub-sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
				Note: Any "N/A" answer must be explained in the Comments.				
OTH	1	X		Section 725.134 Access To Communications Or Alarm Systems	✓			
			a)	Do all personnel involved in handling hazardous waste have immediate access to an internal alarm or emergency communication device, either directly or thru visual or voice contact with another employee, unless not required under Section 725.132? Yes ✓ No ___ N/A ___				
			b)	If there is ever just one employee on the premises while the facility is operating, does he have immediate access to a device, such as a telephone, capable of summoning external emergency assistance, unless such a device is not required under Section 725.132? Yes ___ No ___ N/A ✓				
OTH	1	X		Section 725.135 Required Aisle Space	✓			
				Is the owner or operator maintaining sufficient aisle space to allow the unobstructed movement of personnel, fire equipment and decontamination equipment to any area of the facility? Yes ✓ No ___ N/A ___				
OTH	2			Section 725.137 Arrangements with Local Authorities	✓			
				Has the owner or operator made or attempted to make the following arrangements, as appropriate for the type of waste handled at his facility and the potential need for the services of these organizations:				

Area	C	90 Day F/U	Key Ltr / Sub-sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
			a)1)	1) Arrangements to familiarize police and fire departments and emergency response teams with the layout of the facility, properties of hazardous wastes handled at the facility and associated hazards, places where personnel would normally be working, entrances to roads inside the facility and possible evactuation routes? Yes ✓ No ___ N/A ___				
			a)2)	2) Where more than one police or fire department might respond to an emergency, has one been designated as the primary emergency authority with the others agreeing to provide support to the the primary emergency authority? Yes ___ No ___ N/A ✓				Only one would respond
			a)3)	3) Agreements with State emergency response teams, emergency response contractors and equipment suppliers? Yes ✓ No ___ N/A ___				
			a)4)	4) Arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illnesses which could result from fires, explosions or releases at the facility? Yes ✓ No ___ N/A ___				
				Note: Any "N/A" answer must be explained in the comments.				
			b)	Has the owner or operator documented, in the operating record, refusal of State or local authorities to enter into any or all of the above arrangements? Yes ___ No ___ N/A ✓				

Area	C.	90 Day F/U	Key Ltr / Sub-sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
				Part 725				
				INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES				
			C,E, F,G	Subpart D Contingency Plan and Emergency Procedures				
OTH	1			Section 725.151 Purpose and Implementation of Contingency Plan	✓			
			a)	Is the plan designed to minimize hazards to human health or the environment from fires, explosions or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil or surface waters? Yes ✓ No ___				
			b)	Have the provisions of the plan been carried out immediately whenever there was a fire, explosion or release of hazardous waste constituents which could threaten human health or the environment? Yes ___ No ___ N/A ✓				
OTH	2			Section 725.152 Content of Contingency Plan		✓		
			a)	Does the plan describe the actions facility personnel must take to comply with Sections 725.151 and 725.156 in response to: 1) Fires. Yes ✓ No ___ 2) Explosions. Yes ✓ No ___ 3) Unplanned sudden or non-sudden releases of hazardous waste or hazardous waste constituents to air, soil or surface water? Yes ✓ No ___				The contingency plan does not address the spent pickle liquor in the impoundments or spent perchloroethylene

Area	C.	90 Day F/U	Key Ltr Sub-sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
			c)	Does the plan describe the arrangements agreed to by: 1) Local police and fire departments? Yes ___ No ✓ 2) Hospitals? Yes ___ No ✓ 3) Contractors? Yes ___ No ✓ 4) State and local emergency response teams? Yes ___ No ✓				
			d)	Does the plan list the names, addresses and phone number (office and home) of all personnel qualified to act as emergency coordinators? Yes ✓ No ___				
			d)	Is the list of emergency coordinators up-to-date? Yes ✓ No ___				
			d)	If more than one person is designated as an emergency coordinator is a primary coordinator identified? Yes ___ No ___				Only one emergency coordinator
			e)	Does the Plan identify: 1) All emergency equipment at the facility to include a physical description of the equipment? Yes ✓ No ___ 2) A brief outline of the capability of each piece of emergency equipment? Yes ___ No ✓ 3) The location of each piece of emergency equipment? Yes ✓ No ___				
			e)	Is the list of emergency equipment up-to-date? Yes ✓ No ___				

Area	Cl	90 Day F/U	Key Ltr / Sub-sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
			f)	Does the plan include an evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? Yes ___ No ✓				Facility does not believe an evacuation plan is necessary
			f)	Does the plan identify the signal to be used to begin evacutation? Yes ___ No ✓				
			f)	Are alternate evacuation routes identified? Yes ___ No ✓				
OTH	2			Section 725.153 Copies of Contingency Plan		✓		
				Has a copy (and all revisions) of the contingency plan:				
			a)	a) Been maintained at the facility? Yes ✓ No ___				
			b)	b) Been submitted to all local police and fire departments, hospitals, and State and local emergency response teams that may be called upon to provide emergency service? Yes ___ No ✓				
OTH	2			Section 725.154 Amendment of Contingency Plan			✓	Plan has not been ammended.
				Has the contingency plan been reviewed, and if necessary, amended whenever:				
			a)	1) Applicable regulations are revised? Yes ___ No ___				
			b)	2) The plan fails in an emergency? Yes ___ No ___ N/A ___				

Area		90 Day F/U	Key Ltr Sub-sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
			c)	3) The facility changes - in its design, construction, operation, maintenance or other circumstances - in a way that materially increases the potential for fires, explosions, or releases of hazardous waste or hazardous waste constituents or changes the response necessary in an emergency? Yes ___ No ___ N/A ___				
			d)	4) The list of emergency coordinators changes? Yes __ No ___				
			e)	5) The list of emergency equipement changes? Yes ___ No ___				
OTH	2			Section 725.155 Emergency Coordinator		✓		
				Is there an emergency coordinator on site or on call at all times? Yes ___ No ✓				Only one emergency coordinator. There is no one to fill in during vacations
				Is there an emergency coordinator familiar with all aspects of the contingency plan, all operations and activities at the facility, the location and characteristics of the wastes handled, the location of all records in the facility and the facility layout? Yes ✓ No ___				
				Does the coordinator have the authority to commit the resources to carry out the contingency plan? Yes ___ No ___				
OTH	1 or 2			Section 725.156 Emergency Procedures			✓	
				Has the facility had a release, fire or explosion? Yes __ No ✓				

Area		90 Day F/U	Key Ltr / Sub-sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
				Note: If the answer is "No" check N/A. If the answer is "Yes", explain in detail the incident and how the facility did or did not follow the procedures prescribed in this section. Review the requirements while completing the explanation. If the company failed to meet one or more of the requirements, check "No" in the Apparent Compliance column.				

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Area		90 Day F/U	Key Ltr Sub-sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
				Part 725				
				INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES				
			C,E, F,G	Subpart E Manifest System, Recordkeeping and Reporting				
OTH	1			Section 725.171 Use of Manifest System	___	___	✓	
				Does the facility accept waste from off-site? Yes ___ No ✓				
				Note: If the answer is "Yes", complete this section. If the answer is "No", check "N/A".				
				For each manifest reviewed, did the facility:				
			a)1)	1) Sign and date each copy to certify that the hazardous waste covered by the manifest was received? Yes ___ No ___				
			a)2)	2) Note any significant discrepancies in the manifest or each copy of the manifest? Yes ___ No ___ N/A ___				
			a)3)	3) Immediately give one copy of the completed manifest to the transporter? Yes ___ No				
			a)4)	4) Within 30 days after delivery, send one copy of the manifest to the generator and one copy to the Agency? Yes ___ No ___				

Area		90 Day F/U	Key Ltr Sub-sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
			a)5)	5) Retain a copy of the manifest at the facility for a period of three years from the date of delivery of the waste? Yes ___ No ___				
			b)	Has the facility followed the procedures prescribed in 725.171 (b) for rail or water (bulk shipments) of hazardous waste? Yes ___ No ___				
				Does the facility initiate shipments of hazardous waste? Yes ___ No ___				
				Note: If the answer is "Yes", the facility is also a generator of hazardous waste. Complete the generator checklist.				
				Section 725.172 Manifest Discrepancies			✓	
				Does the facility accept hazardous waste from off-site? Yes ___ No ✓				
				Note: If the answer is "Yes", complete this section. If the answer is "No", check "N/A".				
			d)	Has the owner or operator attempted to resolve significant discrepancies in quantity or type (i.e. variations in weight of 10% or more, variations in piece count of one container per truckload, obvious differences which can be discovered by inspection or waste analysis such as waste solvent substituted for waste acid) upon their discovery? Yes ___ No ___				
			d)	If the discrepancy is not resolved within 15 days after receiving the waste, has the				

Area		90 Day F/U	Key Ltr Sub-sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
				owner or operator submitted to the Agency a letter describing the discrepancy and the attempts made to reconcile it and a copy of the manifest or shipping paper at issue? Yes ___ No ___				
OTH	2			Section 725.173 Operating Record		✓		
			a)	Does the owner or operator have a written operating record at the facility? Yes ✓ No ___				
			b)	Is the information in the operating record being maintained until closure of the facility? Yes ✓ No ___				
				Does the operating record contain the following information?				
			b)1)	1) A description of and quantity of each hazardous waste received at the TSD facility (whether from on or off-site generation)? Yes ___ No ✓				
			b)1)	2) A record of the method(s) and date(s) of its treatment , storage, or disposal as required by Appendix I? Yes ___ No ✓				
			b)2)	3) The location of each hazardous waste within the facility? Yes ___ No ✓				
			b)2)	4) The quantity of each hazardous waste at each location withing the facility? Yes ___ No ✓				
			b)2)	5) For disposal facilities, a map recording the location and quantity of hazardous waste in each cell or disposal area? Yes ___ No ___ N/A ✓				

Area		90 Day F/U	Key Ltr Sub-sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
			b)2)	6) A cross reference by manifest number to location and quantity of hazardous waste? Yes ___ No ___ N/A ✓				
			b)3)	7) Records and results of waste analyses and trial test performed as specified in Sections:				
				- 725.113 (Gen. Waste Analysis) Yes ✓ No ___				
				- 725.293 (Tanks) Yes ___ No___ N/A ✓				
				- 725.325 (Surface Improvements) Yes ___ No ✓ N/A ___				
				- 725.352 (Waste Piles) Yes___ No ___ N/A ✓				
				- 725.373 (Land Treatment) Yes ___ No ___ N/A ✓				
				- 725.441 (Incinerators) Yes ___ No ___ N/A ✓				
				- 725.475 (Thermal Treatment) Yes ___ No ___ N/A ✓				
				- 725.502 (Chem., Phys., Bio. Treatment) Yes ___ No ___ N/A ✓				
			b)4)	8) Summary reports and details of all incidents that require the implementation of the contingency plan as specified in Section 725.156(j)? Yes ___ No ___ N/A ✓				
			b)5)	9) Records and results of inspections as required by Section 725.115(d)? Yes ___ No ✓				

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Area	C	90 Day F/U	Key Ltr / Sub-sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
				Note: The above information need only be kept for three years. This period would automatically be extended during any unresolved enforcement action.				
			b)6)	10. Monitoring, testing or analytical data where required by Sections:				
				- 725.190 (G.W. Monitoring) Yes__ No__ N/A ✓				
				- 725.194 (G.W. Monitoring) Yes__ No__ N/A ✓				
				- 725.376 (Land Treatment) Yes__ No__ N/A ✓				
				- 725.378 (Land Treatment) Yes__ No__ N/A ✓				
				- 725.380 (d)(1) (Land Treatment) Yes__ No__ N/A ✓				
				- 725.447 (Incinerators) Yes__ No__ N/A ✓				
				- 725.477 (Thermal Treatment) Yes__ No__ N/A ✓				
				Note: Data required under 725.194 must be kept thoughout the post-closure period.				
			b)7)	11) All closure cost estimates required by Section 725.242? Yes ✓ No __				
			b)7)	12) All post-closure cost estimates for disposal facilities required for Section 725-244? Yes ✓ No__				

Area	C.	90 Day F/U	Key Ltr Sub-sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
OTH	2			Section 725.174 Availability, Retention and Disposition of Records	✓			
			a)	During the inspection were all existing records, including plans, required under this Part furnished upon request and made available at all reasonable times for inspection as required by this Section? Yes ✓ No ___				
			c)	Upon closure of a waste disposal facility did the owner or operator submit a copy of the record of waste disposal location(s) and quantities to: - The Agency? Yes ___ No ___ - The local land authority? Yes ___ No ___ N/A ___				
			b)	Are all required records being maintained and retained during the course of any unresolved enforcement action or as requested by the Director? Yes___ No___ N/A ___				
OTH	2			Section 725.175 Annual Report	✓			
				Has the owner or operator prepared and submitted a copy of an annual report, supplied by the Agency, to the Agency by March 1 for the preceding calendar year? Yes ✓ No ___ N/A ___				

Area		90 Day F/U	Key Ltr Sub-sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
OTH	1			Section 725.176 Unmanifested Waste Report Does the facility accept hazardous waste from off-site ? Yes ___ No ✓ Note: If the answer is "Yes", complete this section. If the answer is "No", check "N/A". Has the facility accepted hazaradous waste from an off-site source for treatment, storage or disposal without an accompanying manifest for shipping paper? Yes ___ No ___ Was the hazardous waste accepted without the manifest or shipping paper exempt from the manifesting requirement by 35 Ill. Adm. Code 721.105? Yes ___ No ___ Note: If the answer to both the above questions is "Yes" check "N/A". If the answer to the first question is "Yes" and the second "No", answer the following questions. Did the owner or operator complete an unmanifested waste report to include the information required in Section 725.176(a) thru (g)? Yes ___ No ___ Did the owner or operator submit the unmanifested waste report to the Agency within 15 days of receiving the waste? Yes ___ No ___	___	✓	✓	

Area	C	90 Day F/U	Key Ltr Sub-sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
OTH	2			Section 725.177 Additional Reports			✓	
				Has the owner or operator submitted to the Agency, as required, reports concerning:				
			a)	1) Releases, fires, explosions as specified in Section 725.156? Yes ___ No___ N/A ___				
			b)	2) Groundwater contamination and monitoring data as specified in Sections 725.193 and 725.194? Yes___ No ____ N/A ___				
			c)	3) Facility closure as specified in Section 725.125? Yes ___ No ___ N/A ___				

Area	C.	90 Day F/U	Key Ltr / Sub-sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
				Part 725				
				INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES				
			C,E, F,G	Subparts G & H — Closure, Post-Closure and Financial Requirements				
CLO	1			Section 725.212 — Closure Plan	✓			
			a)	Is the facility closure plan available at the facility? Yes ✓ NO ___				Closure Plan submitted on July 3, 1986. Deemed not filed on 9/29/86. Facility quit putting K062 into ditch on October 31, 1986
			c)	Was the closure plan submitted to the Agency within the time frames specified below?				
				- At least 180 days before the date closure was (is) expected to begin? Yes ✓ No ___ N/A ___				
				- No later than 15 days after termination of interim status (unless a full operating permit was issued simultaneously)? Yes ___ No ___ N/A ___				
				- No later than 15 days after issuance of a judicial decree, board order or compliance order issued and Section 3008 of RCRA to cease receiving waste or close? Yes ___ No ___ N/A ___				
CLO	1			Section 725.218 — Post-Closure Plan	✓			
				Is the facility post-closure plan available at the facility? Yes ✓ No ___ N/A ___				

Area		90 Day F/U	Key Ltr Sub-sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
FIN	1			Section 725.242 Cost Estimate For Facility Closure Has the facility prepared a written estimate of the cost of closing the facility in accordance with the closure plan as specified in Section 725.212? Yes ✓ No ___	✓			
FIN	1			Section 725.244 Cost Estimate For Post-Closure Care Has the facility prepared a written estimate of the annual cost of post-closure monitoring and maintenance of the facility? Yes ✓ No ___ N/A ___	✓			

Area		90 Day F/U	Key Ltr / Sub-sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
				Part 725				
				INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES				
			A, D. C, E, F, G	Subpart I Use and Management of Container				
OTH	1	X		Section 725.271 Condition of Containers	✓			
				Has the owner or operator transferred the hazardous waste in leaking container or containers which are not in good condition or managing the waste in some other way that complies with the requirements of this Part? Yes ✓ No ___ N/A ___				
OTH	1	X		Section 725.272 Compatibility of Waste with Container	✓			
				Is the owner or operator using containers made of or lined with materials which will not react with and are otherwise compatible with the hazardous waste to be stored so that the ability of the container to contain the waste is not impaired? Yes ✓ No ___				
OTH	1	X		Section 725.273 Management of Containers		✓		Containers of arc dust were open (See 722.134 (a))
			a)	Are containers of hazardous waste always closed during storage? Yes ___ No ✓				

Area	C	90 Day F/U	Key Ltr Sub-sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
			b)	Are containers of hazardous waste being opened, handled or stored in manner which will prevent the rupture of the container or prevent it from leaking? Yes ___ No ___				
OTH	2			Section 725.274 Inspections	✓			
				Is the owner or operator inspecting areas where the containers are stored at least weekly, looking for leaks and for deterioration caused by corrosion or other factors? Yes ✓ No ___				
				Note: Any evidence of leakage may be a reason to answer "No" to the above question, even if there are inspection records that indicate that inspections are being done.				
				Review the responses in Section 725.115, General Inspection Requirements, the frequency of inspections, the date of the last inspection, etc. to determine if inspections are actually being done.				
OTH	1	X		Section 725.276 Special Requirements for Ignitable or Reactive Wastes	✓			
				Are containers holding ignitable or reactibe waste located at least 50 feet from the property line? Yes ✓ No ___				
OTH	1	X		Section 725.277 Special Requirements for Incompatible Wastes			✓	
				Is the owner complying with the requirements concerning the management of incompatible wastes or incompatible wastes and materials contained in this Section? Yes ___ No ___				

Area	C.	90 Day F/U	Key Ltr Sub-sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
				Part 725				
				INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES				
			C,E, F,G	Subpart J Tanks				
OTH	1	X		Section 725.292 General Operating Requirements				
			a)	Is the treatment or storage of hazardous waste in tanks in compliance with Section 725.117(b) (General Requirements for Ignitable, Reactive or Incompatible Wastes) ? Yes ___ No ___ N/A ___				
			b)	Are only hazardous wastes or treatment reagents being placed in a tank which will not cause the tank or its inner liner to rupture, leak, corrode or otherwise fail before the end of its intended life? Yes ___ No ___				
			c)	Are uncovered tanks being operated: - With two feet of free board? Yes ___ No ___ - With a containment structure, a drainage control system or a diversion structure with a capacity that equals or exceeds the volume of the top two feet of the tank? Yes ___ No ___				
			d)	Is a tank which has a continuous feed of hazardous waste into it equipped with a means to stop this inflow? Yes ___ No ___				

Area	C	90 Day F/U	Key Ltr Sub-sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
				Part 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILTIES				
			C.E. F.G.	Subpart K: Surface Impoundments				
OTH	1	X		Section 725.321 Design Requirements			✓	No new impoundment
			a)	Has the owner or operator met the requirements for liners and leachate collection systems in accordance with 35 Ill. Adm. Code 724.321(c) for each new unit, or lateral expansion of an existing unit that is within the area identified in the facility Part A permit application? Yes ____ No ____ N/A ✓ Note: If "N/A" is checked, provide a detailed explanation of why the site is not subject to the requirements, or why the requirements have been waived by the Agency pursuant to 725.321 (c) or (d).				
			a)	Did the owner or operator meet the above requirement for waste received after May 8, 1985? Yes ____ No ____				
			b)	Has the owner or operator notified the Agency, in writing, at least 60 days prior to receiving waste? Yes ____ No ____				
			b)	Did the owner or operator submit a Part B Permit application within six months of the Agency's receipt of notification? Yes ____ No ____				

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Area	L	90 Day F/U	Key Ltr / Sub-sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
OTH	I	X		Section 725.322 General Operating Requirements	✓			
				Does the owner or operator make the claim that a free board of less than two feet may be maintained in the surface impoundment? Yes ____ No ✓				
			a)	Does the surface impoundment have at least two fee of free board? Yes ✓ No ____				
				Note: If the claim is made that two feet of free board is not necessary and there is less than two feet of free board, complete the following questions:				
			b)	Has the owner or operator obtained certification by a qualified engineer that alternate design features or operating plans will, to the best of the engineer's knowledge and opinion, prevent overtopping of the dike? Yes ____ No ____				
			b)	Is the certification along with a written identification of alternate design features or operating plans preventing overtopping available at the facility? Yes ____ No____				
OTH	I	X		Section 725.323 Containment	✓			
				Are all earthen dikes covered with grass, shale or rock to minimize wind and water erosion and to preserve their structural integrity? Yes ✓ No ____ N/A ____				

Area	C.	90 Day F/U	Key Ltr Sub-sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
OTH	1			Section 725.325 Waste Analysis and Trial Tests			✓	Only K062 has been placed in impoundments.
				Prior to using a surface impoundment to chemically treat a hazardous waste which is substantially different from waste previously treated in the surface impoundment; or chemically treat hazardous waste with a substantially different process than any previously used in that impoundment, has the owner or operator:				
			b)1)	1) Conducted waste analysis or trial treatment tests? Yes ___No___ N/A___				
			b)2)	2) Obtained written, documented information on similar treatment of similar wastes under similar operating conditions to show that this treatment will comply with Section 725.117(b)? Yes ___No ___ N/A_____				
OTH	2			Section 725.326 Inspections	✓			
				Is the owner or operator inspecting:				
			a)	1. The free board level at least once each operating day to ensure compliance with Section 725.322? Yes ✓ No ____				
			b)	2) The surface impoundment, including dikes and vegetation surrounding the dike, at least once a week to detect any leaks, deterioration or failures in the impoundment? Yes ✓ No ____				
				Note: Any evidence of leakage may be a reason to answer "No" to the above questions even if there are inspection				

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Area	C	90 Day F/U	Key Ltr / Sub-sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
				records that indicate that inspections are being done. Review the responses in Section 725.115, General Inspection Requirements, the frequency of inspections, the date of the last inspection, etc, to determine if inspections are actually being done.				
CLO	1			Section 725.328 Closure			✓	Impoundments not closed
			b)	Has the owner or operator removed from the impoundment: 1) standing liquids, 2) waste and waste residues, 3) the liner, if any and 4) underlying and surrounding contaminated soil? Yes ✓ No___ N/A___				
			b)	Has the owner or operator demonstrated that, at any stage of removal, the remaining materials in the impoundment are not hazardous wastes per Section 721.103 (c) and (d)? Yes ___ No ✓ N/A ___				
			c)	Has the owner or operator closed the impoundment and provided post-closure care as for a landfill under Subpart G and Section 725.410? Yes ___ No___ N/A ✓				
				Note: Determine compliance or non-compliance with this Section only in conjunction with a closure verification inspection conducted after the facility and its independent registered professional engineer have certifed closure in accordance with an approved closure plan.				
OTH	1			Section 725.329 Special Requirements for Ignitable or Reactive Wastes			✓	

Area	C	90 Day F/U	Key Ltr Sub-Sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
				Is the impoundment used solely for emergencies? Yes ___ No ___ Note: If the answer to this question is "No", complete the rest of this Section. Have ignitable or reactive wastes been treated, rendered or mixed before or immediately after placement in the impoundment so that:				
			a)	1) The resulting waste, mixture or dissolution of material no longer meets the definition of ignitable or reactive waste under Section 721.121 or 721.123? Yes ___ No ___ N/A ___ 2) Section 725.117(b) is complied with? Yes ___ No ___ N/A___				
			b)1)	Is the waste managed in such a way that it is protected from any material or condition which may cause it to ignite? Yes ___ No ___ N/A___				
			b)2)	Has the owner or operator obtained a certification from a qualified chemist or engineer that, to the best of the chemist's or engineer's knowledge and opinion, the design features or operating plans of the facility will prevent ignition or reaction? Yes ___ No___ N/A___				
			b)3)	Is the chemist's or engineer's certification and the basis for it maintained at the facility? Yes__No__N/A__ Note: If the answer to any of the previous three questions is "No", the facility is not in compliance.				

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Area	C.	90 Day F/U	Key Ltr Sub-sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
OTH	1			Section 725.330 Special Requirements for Incompatible Waste	___	___	✓	
				Is the owner or operator complying with the requirements concerning the management of incompatible wastes or incompatible wastes and materials contained in this Section? Yes ___ No ___				
				Part 725				
				INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES				
			C,E F,G	Subpart L: Waste Piles				
OTH	1	X		Section 725.351 Protection from Wind	___	___	___	
				Is the waste pile subject to dispersal by the wind? Yes ___ No ___				
				Note: If the answer is "Yes", complete the rest of this section. If "No", then check "N/A" and describe why the pile is not subject to wind dispersal in the Remarks.				
				Is the owner or operator:				
				1) Covering the pile to control dispersal? Yes ___ No ___ N/A ___				
				2) Managing the pile by some other means to control dispersal? Yes__ No__ N/A__				
				Note: If the answer to 2 is "Yes", explain in detail the "other means" being used to control dispersal.				

Date: February 23, 1988

Time: 9:00 Am to 3:00 pm

Photographed By:

John Tripses

Location:

LPC 143 005 0001

Bartonville / Keystone

Peoria Co.

Comments: Photograph taken

toward the northwest

Photograph Number: 11

Roll Number: 88-16

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Date: February 23, 1988

Time: 9:00 Am to 3:00 pm

Photographed By:

John Tripses

Location:

LPC 143 005 0001

Bartonville / Keystone

Peoria Co.

Comments: Photograph taken

toward the west

Photograph Number: 12

Roll Number: 88-16

: February 23, 1988

: 9:00 Am to 3:00 pm

.ographed By:

John Tripses

:tion:

143 005 0001

tonville / Keystone

Peoria Co.

ıents: Photograph taken

ırd the south

:ograph Number: 09

L Number: 88-16

e: February 23, 1988

e: 9:00 Am to 3:00 pm

:ographed By:

ohn Tripses

ation:

143 005 0001

rtonville / Keystone

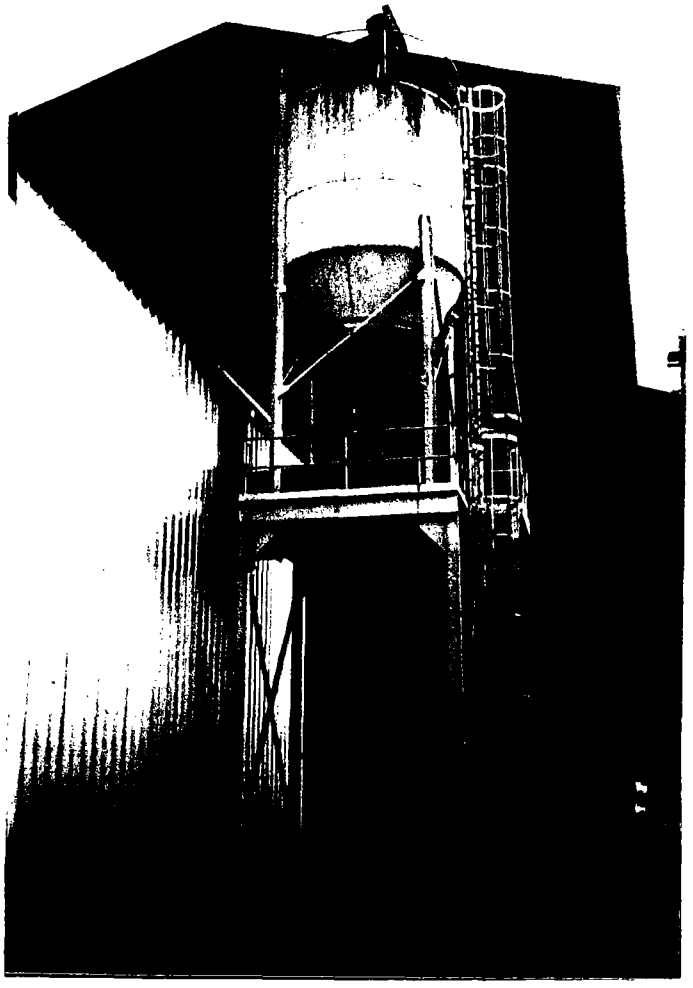
Peoria Co.

ments: Photograph taken

ard the south

tograph Number: 10

l Number: 88-16



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APR 0 5 1988
IEPA-DLPC

Date: February 23, 1988

Time: 9:00 Am to 3:00 pm

Photographed By:

John Tripses

Location:

LPC 143 005 0001

Bartonville / Keystone

Peoria Co.

Comments: Photograph taken

toward the

Photograph Number: 07

Roll Number: 88-16

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Date: February 23, 1988

Time: 9:00 Am to 3:00 pm

Photographed By:

John Tripses

Location:

LPC 143 005 0001

Bartonville / Keystone

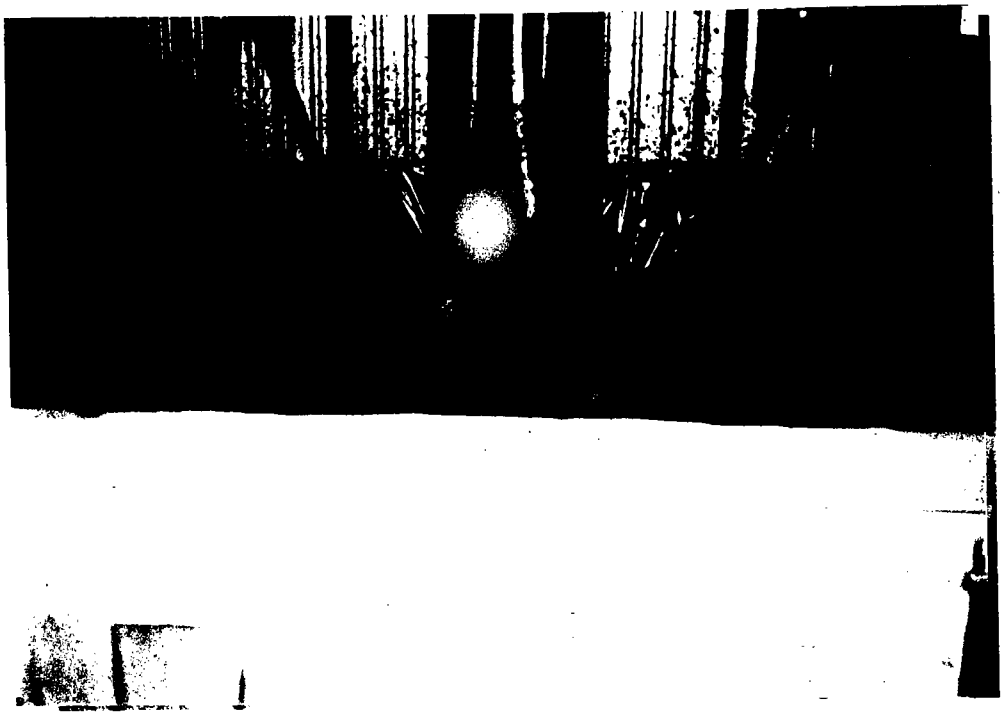
Peoria Co.

Comments: Photograph taken

toward the south

Photograph Number: 08

Roll Number: 88-16



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John Tripses

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artonville / Keystone

Peoria Co.

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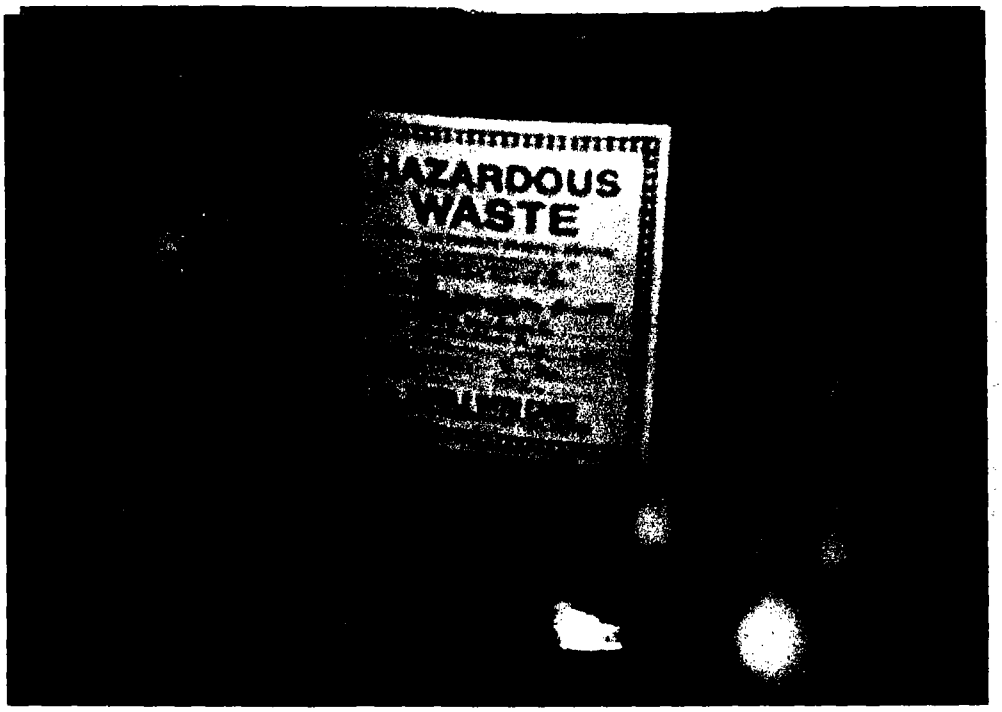

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ate: February 23, 1988

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hotographed By:

John Tripses

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PC 143 005 0001

Bartonville / Keystone

Peoria Co.

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hotograph Number: 06

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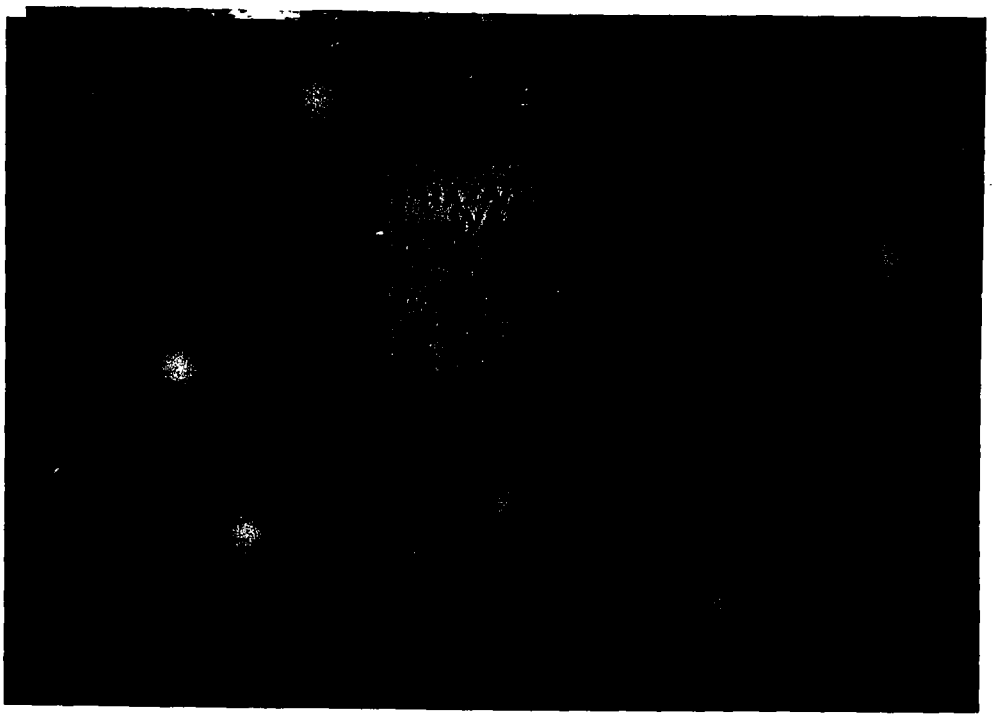

Date: February 23, 1988

Time: 9:00 Am to 3:00 pm

Photographed By:

John Tripses

Location:

LPC 143 005 0001

Bartonville / Keystone

Peoria Co.

Comments: Photograph taken

toward the southeast

Photograph Number: 03

Roll Number: 88-16

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APR 0 [illegible]
IEPA-DLPC

Date: February 23, 1988

Time: 9:00 Am to 3:00 pm

Photographed By:

John Tripses

Location:

LPC 143 005 0001

Bartonville / Keystone

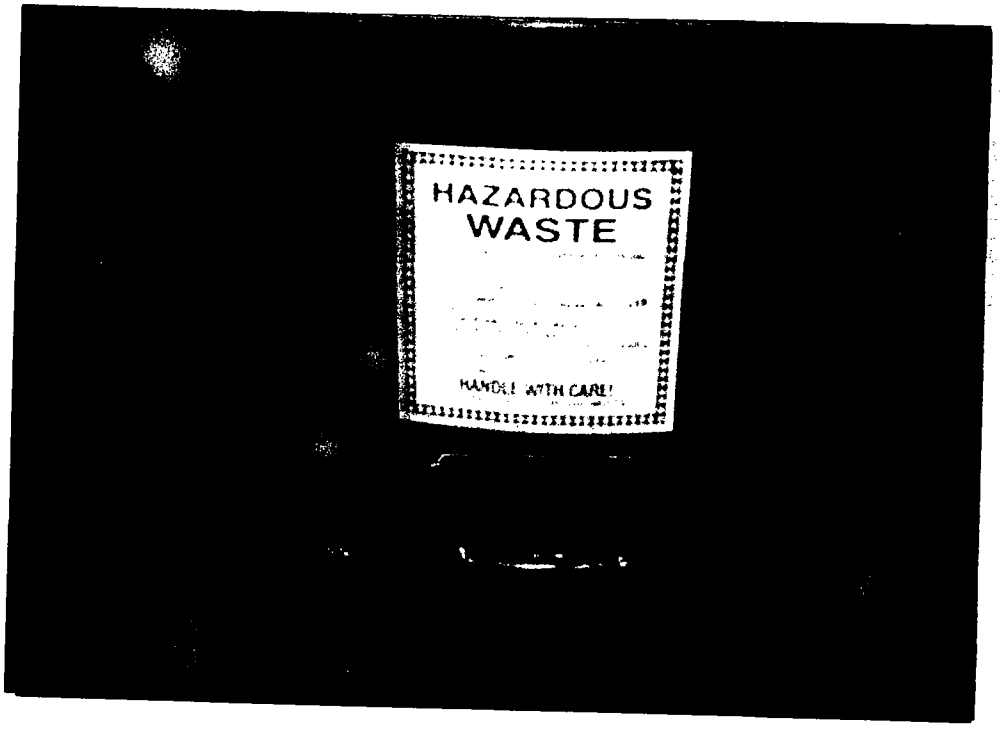
Peoria Co.

Comments: Photograph taken

toward the

Photograph Number: 04

Roll Number: 88-16



Date: February 23, 1988

Time: 9:00 Am to 3:00 pm

Photographed By:

John Tripses

Location:

LPC 143 005 0001

Bartonville / Keystone

Peoria Co.

Comments: Photograph taken toward the north

Photograph Number: 01

Roll Number: 88-16

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Date: February 23, 1988

Time: 9:00 Am to 3:00 pm

Photographed By:

John Tripses

Location:

LPC 143 005 0001

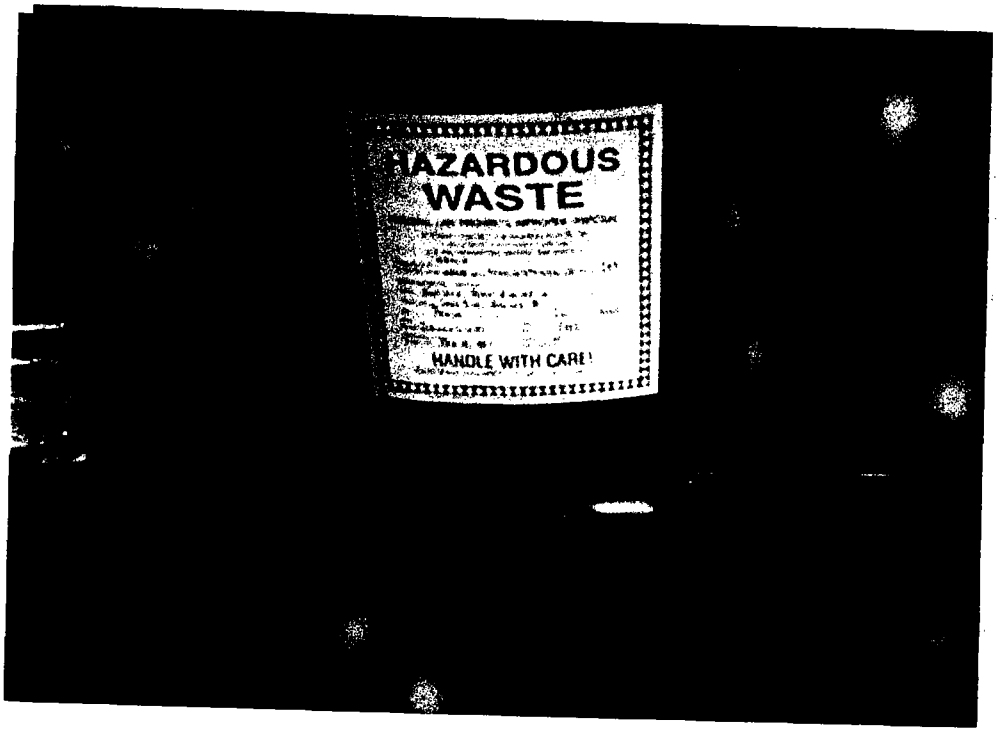
Bartonville / Keystone

Peoria Co.

Comments: Photograph taken toward the north

Photograph Number: 02

Roll Number: 88-16



Subpart F INSP.

STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY
INSPECTION REPORT

USEPA Number: ILD 000714881 IEPA Number: 143005 0001

Facility Name: Keystone Group Bartonville Plant (Keystone Steel + Wire Co.)

Street: 7000 S.W. ADAMS
City: Bartonville Telephone: 309/697-7020
County: Peoria State: IL Zip Code: 61641

Type of Facility: Notified As: Gen/Tran/TSD Regulated As: Gen/Storer
LDF? yes X no __ HPV? yes __ no __ 90 Day Follow-up Required? yes __ no __

Region: 3 Date of Inspection: 3-14-88 From: 10 00 A to 4 00 P
Weather (LDF Only): Cloudy 35°

Type of Inspection
ISS: __ Sampling: __ Citizen Complaint: __ Closed: __ Withdrawal: __
Record Review: __ Follow-up to Inspection of _____: __ ~~Other:~~ X CME

Non Regulated Status
Small Quant. Gen:: __ Claimed Nonhandler: __ Other(Specify in narrative): __

Notified As/Regulated As Matrix Number: ____ Key Letter: ____

Notification date, 8-18-80, from initial __ or subsequent __ notification.

Part A date, 11-18-80, from initial __ or amended __ Part A.

Part B permit application submitted? yes __ no __

Has the firm been referred to: USEPA? yes ✓ no __; IAG? yes __ no ✓; County States Attorney? yes __ no ✓. Date of referral to USEPA: 7-8-85, IAG: _____, County States Attorney: _____.

Federal Court Order Issued: _____ State Court Order Issued: _____
(CACO)-USEPA : COMPLIANCE ORDER ISSUED: 6-28-85
(CAFO)-USEPA FINAL Order Issued: _____ Illinois PCB Order Issued: _____

TSD Facility Activity Summary

Activity(By Process Code)	On Pt A	Activity Conducted Prior to 1980	Was Activity Ever Done	Closed	Being Done at Time of Inspection	Exempt From Regulation per 35 IAC, Section:	On Annual Report For 83	84	85
S03	Y	Y	Stopped in 1976	1978	N		N	N	N
D80	Y	Y	"	"	N		N	N	N
T04	Y	Y	Y	N	Y	703.123(d)	N	N	N
T02	Y	Y	Y	Waste Delisted	N		N	N	N
D83	Y	Y	Y	"	N		N	N	N
S04	N	Y	Y	N	Y		N	N	N

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Operator: Keystone Steel + Wire Telephone #: 309/697-7020

Street: 7000 SW ADAMS

City: Bartonville State: Ill Zip Code: 61641

Owner: Keystone Consolidated Industries Inc. Telephone #: 214/454-0028

Street: 4835 LBJ Freeway Suite 300

City: DALLAS State: TX Zip Code: 75234

Person Interviewed	Title	Telephone #
Bob Aten	SENIOR GEOLOGIST GeoSciences	812/336-0972
Dale Bennington	Mgr Energy + Envir. Engineering	309/697-7020

Inspection Participants	Agency/Title	Telephone #
TIM CASE	DLPE/LSCT	309/693-5462
Ken Liss	DLPE/EPS III	217/782-6760
Kevin Pierard	USEPA (V)/Geologist	312/353-2197

Prepared By	Agency/Title	Telephone #
TIM CASE	DLPE/LSCT	309/693-5462

* This will be cited in a CIL from Ken Liss... in compliance.

Summary of Apparent Violations

Area	Class	Section	Area	Class	Section	Area	Class	Section
		725.190(a) **						
		725.191(a) **						
		725.192(a) **						
		725.193(a) **						
		725.193(b) **						
		725.194 **						

** Continuing Violations

Date: 3-14-88

Time: 1000A to 400P

Photographed By:

TIM CASE

Location:

LPC 143 005 0001

Bartonville/Keystone

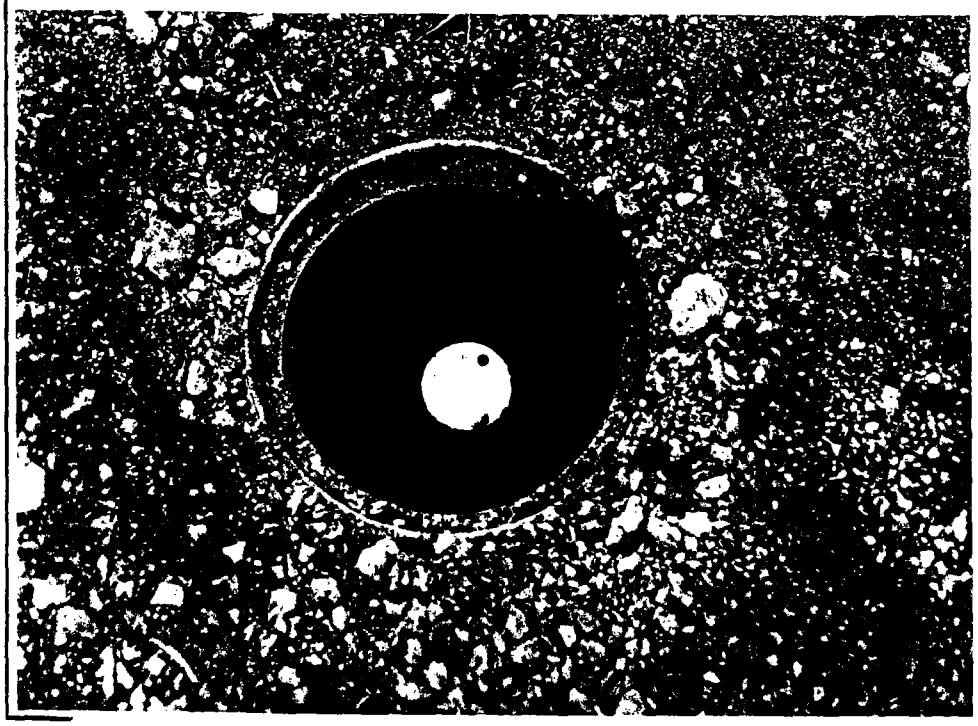
Peoria Co.

Comments: Photograph taken toward the Ground and to the West

W-14

Photograph Number: 11

Roll Number: 88-026-10



Date: 3-14-88

Time: 1000A to 400P

Photographed By:

TIM CASE

Location:

LPC 143 005 0001

Bartonville/Keystone

Peoria Co.

Comments: Photograph taken toward the

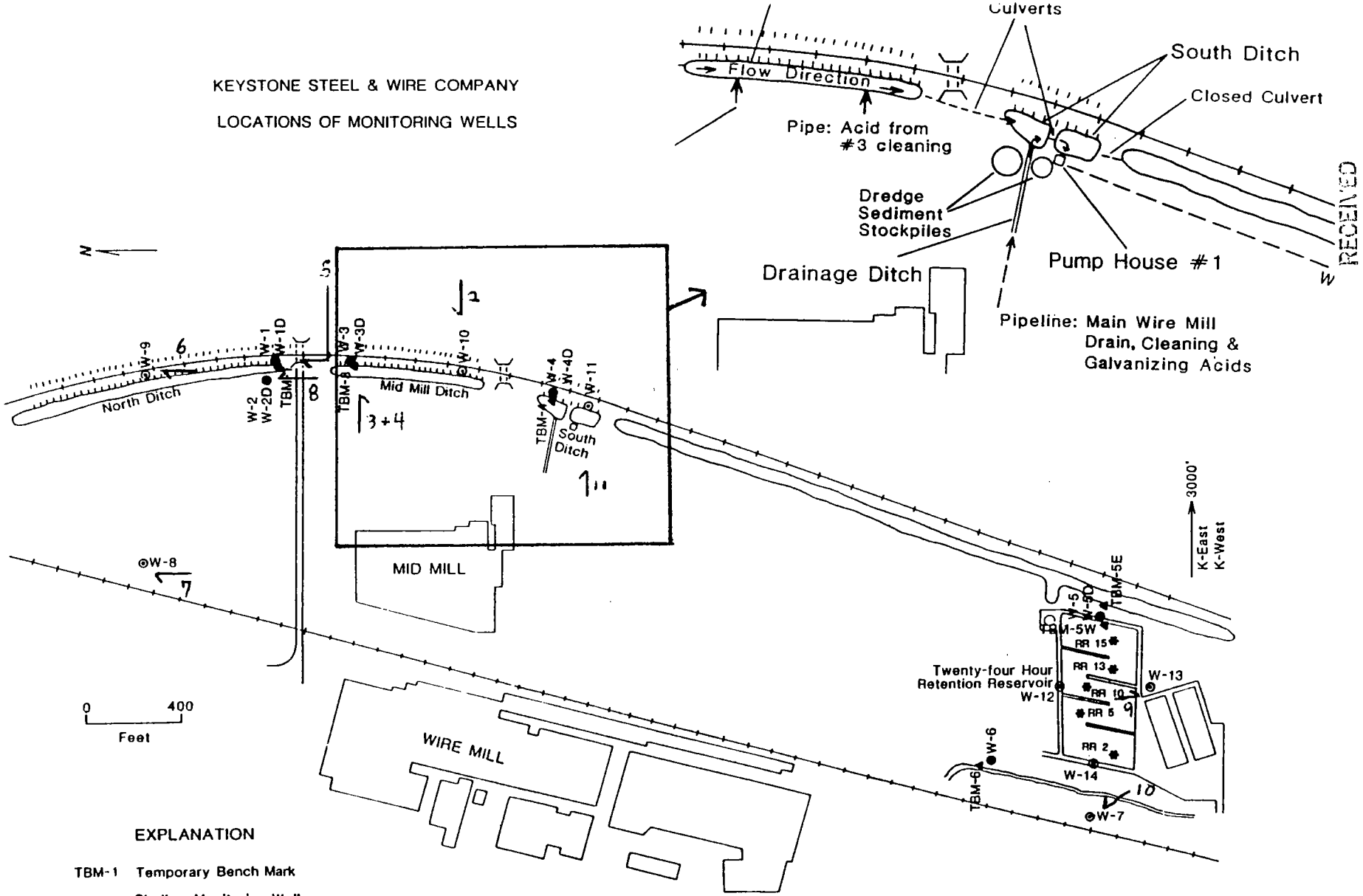
Photograph Number:

Roll Number: 88-026-

No Photograph

KEYSTONE STEEL & WIRE COMPANY

LOCATIONS OF MONITORING WELLS



EXPLANATION

TBM-1	Temporary Bench Mark
W-1	Shallow Monitoring Well
W-1D	Deep Monitoring Well
K-East	Keystone Water Supply Well
⊙	Proposed Monitoring Well
✱	Shelby Tube Sample Location

1 DIRECTION OF PHOTOGRAPHS

Geosciences Research Associates, Inc.
627 North Morton Street
Bloomington, Indiana 47401

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NARRATIVE

A RCRA comprehensive groundwater monitoring evaluation (CME) was conducted at the Bartonville Keystone Steel and Wire Company on March 14, 1988 by this author (Tim Case). This site is currently under investigation by the IEPA, USEPA, and the Justice Department. The site is knows as LPC #143 005 0001 and ILD #000714881. The facility notified as a generator/TSD and is regulated as a generator/storer.

Keystone produces nails, barbed wire, and fence wire. Until October 1, 1986, spent pickle liquor that was used in cleaning steel was discharged into surface impoundments. Sediments have accumulated in these impoundments. These sediments and the ground below are considered to be contaminated due to contact with these spent pickle liquors. The following regulated units are considered to be potentially contaminated:

1. Mid Mill Ditch
2. South Ditch
3. Twenty-Four-Hour Retention Reservoir
4. North Dredge Pile
5. South Dredge Pile
6. Surface Drainage Ditch
7. North Ditch

Spent pickle liquor was discharged at two points, the mid mill ditch and the south ditch, via a surface drainage ditch. The general flow of this liquid is south from the north ditch to the south ditch. The liquid was then pumped from the south ditch to the twenty-four-hour retention reservoir. Two waste piles were also created from dredging the south ditch. See site sketch for locations of regulated units.

The following individuals participated in the inspection:

Tim Case	DLPC/LSCT	309/693-5462
Ken Liss	DLPC/EPS III	217/782-6760
Kevin Pierard	USEPA, Region V	312/353-2197
Dale Bennington	Mgr. Energy & Envir. Eng., Keystone	309/697-7552
Robert Aten	Senior Geologist, GeoSciences	812/336-0972

This author, Ken Liss, and Kevin Pierard arrived at the facility at 10 a.m. Documents provided by GeoSciences Research Associates and Keystone were reviewed. The CME checklist was also reviewed and the applicable sections were completed. The facility's waste treatment facilities, all ditches, waste piles, previous discharge points, monitor wells, and the twenty-four-hour retention reservoir were toured. See photographs #1 - #11 deplicting monitor wells that were recently repaired. See site sketch.

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The remainder of the narrative corresponds to the applicable sections of Appendix A. This is to allow for the narrative to complement the checklist, without being repetitious.

The facility's file was reviewed prior to the inspection. The facility has neither provided nor does it have a sampling and analysis plan or an assessment program. This an apparent violation of 725.192 for failure to have a groundwater sampling and analysis plan and 725.193 for failure to have a groundwater quality assessment program.

A more comprehensive narrative of the geology and hydrogeology should be provided that includes information obtained from the recently installed monitor wells. This should include hydrologic and geologic cross sections. It should also address information obtained from the preparation of geologic and soil maps, water table maps and a topographic map delineating facility/site features and characteristics including the regulated units and monitor well locations.

Very little work has been performed on the shale bedrock layer. It cannot be considered to be a confining layer until further information is provided.

A permanent bench mark needs to be established to confirm that well casing and water level measurements are accurate.

Field permeability tests should be performed on the monitor wells that have not yet been tested.

The facility needs to install additional monitor wells where distances between existing monitor wells is great. Additional wells need to be installed to conclusively determine if the facility is affecting groundwater quality. This is an apparent violation of 725.190 for failure to implement a groundwater monitoring program capable of determining the facility's impact on the quality of groundwater in the uppermost water bearing unit underlying the facility.

The field evaluation of the facility's groundwater monitoring system occurred on three different dates. An inspection was conducted on December 17, 1987 to observe the installation of monitor wells. An inspection was conducted on February 17, 1988 to observe sampling procedures. The final CME inspection as conducted on March 14, 1988. See RCRA reports dated December 17, 1987 and February 17, 1988 for a narrative description for those inspections. The applicable sections of the checklist were completed on those dates. They are included in this report. All inspections were completed by this author (Tim Case).

Although no sampling and analysis plan exists, the Quality Assurance Project Plan for Randolph and Associates, Inc., was reviewed. Randolph is the contract lab for Keystone and is also an IEPA contract lab. The laboratory's analytical procedures meet or exceed all of the requirements of RCRA. The facility is still required to submit a sampling and analysis plan.

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SUMMARY OF APPARENT VIOLATIONS

725.190(a):

The owner or operator of a surface impoundment, landfill or land treatment facility which is used to manage hazardous waste must implement a groundwater monitoring program capable of determining the facility's impact on the quality of groundwater in the uppermost aquifer underlying the facility, except as Section 725.101 and paragraph (c) provide otherwise.

The facility is in apparent violation of this section because the current monitoring system is incapable of providing sufficient information in determing the facility's impact on the quality of the uppermost water bearing unit underlying the facility.

725.191(a):

A groundwater monitoring system must be capable of yielding groundwater samples for analysis and must consist of:

1) Monitoring wells (at least one) installed hydraulically upgradient (i.e., in the direction of increasing static head) from the limit of the waste management area. Their number, locations and depths must be sufficient to yield groundwater samples that are:

A) Representative of background groundwater quality in the uppermost aquifer near the facility; and

B) Not affected by the facility; and

2) Monitoring wells (at least three) installed hydraulically downgradient (i.e., in the direction of decreasing static head) at the limit of the waste management area. Their number, locations and depths must ensure that they immediately detect any statistically significant amounts of hazardous waste or hazardous waste constituents that migrate from the waste management area to the uppermost aquifer.

The facility is in apparent violation of this section because no monitor wells have been confirmed to be upgradient which are capable of yielding groundwater samples representative of background quality in the uppermost water bearing unit underlying the facility. Insufficient documentation has been provided to establish that the number, locations, and depths of monitor wells will ensure that they immediately detect any statistically significant amounts of hazardous waste constituents that migrate away from the waste management area. Additional geologic, hydrogeologic, and topographic information needs to be submitted before a determination can be made as to the adequacy of the facility's groundwater monitoring system.

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725.192(a):

The owner or operator must obtain and analyze samples from the installed groundwater monitoring system. The owner or operator must develop and follow a groundwater sampling and analysis plan. He must keep this plan at the facility.

The facility is in apparent violation of this section for failure to develop and follow a groundwater sampling and analysis plan.

725.193(a):

By no later than November 19, 1981, the owner or operator must prepare an outline of a groundwater quality assessment program.

The facility is in apparent violation of this section because they have not prepared a groundwater assessment program.

725.193(b):

For each indicator parameter specified in Section 725.192(b)(3) the owner or operator must calculate the arithmetic mean and variance, based on at least four replicate measurements on each sample, for each well monitored in accordance with Section 725.192(d)(2) and compare these results with its initial background arithmetic mean. The comparision must consider individually each of the wells in the monitoring system and must use the Student's t-test at the 0.01 level of significance to determine statistically significant increases (and decreases, in the case of pH) over initial background.

The facility is in apparent violation of this section because no statistical comparison has been performed on the data obtained from the monitor wells.

725.194:

The facility is in apparent violation of this section, but the violation will not be cited by this author. The violation will be cited by Ken Liss from compliance.

A letter will be sent to the facility stating that at the time of the inspection, apparent violations found in previous inspection(s) were again observed.

TDC/lc

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COMMENTS

(Numbered to Correspond With Questions in Appendixes)

I.A.1.:

c.) Documents were reviewed from the USEPA, IEPA, Justice Department, and newspapers.

e.) Contractor reports from GeoSciences Research Associates, Inc., Environmental Resources Management--North Central, Inc., Daily Analytical Laboratories, Randolph and Associates, Inc., Enseco, Inc., and Kirkland and Ellis were reviewed prior to the inspection.

f.) Reports were reviewed from the Illinois State Geological Survey, Illinois State Water Survey, and the Illinois Institute of Natural Resources.

g.) The facility does not have a sampling and analysis plan. The quality assurance project plan from the facility's contract lab (Randolph and Associates, Inc.) was reviewed.

h.) The facility does not have a groundwater assessment program outline.

I.B.1.:

a.) The facility had conducted the following 69 borings:

13 - 1938 & 1939
1 - 1946
36 - 1968
19 - Jan. 1986 to Jan. 1988 - Monitor Wells
69

b.) Grain size analysis, atterberg limits, and cation exchange capacity results were obtained on shelby tube samples obtained from monitor wells 7, 8, 12, 13, and 14.

c.) All water level measurements are obtained from static water levels in the 19 monitor wells. Water level measurements are also taken from the ditches and reservoirs.

d.) Lab permeabilities were obtained on monitor wells 2, 5, 7, 8, 12, and 13. Field permeabilities were obtained on monitor wells 1 through 6.

f.) Geochemical analyses were performed on sludge samples taken from ditches, waste piles, and reservoirs.

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I.B.2.:

e.) Hydraulic conductivity measurements of cores were obtained from monitor wells 2, 5, 7, 8, 12, and 13. This is a vertical permeability obtained from shelby tube samples taken from various depths.

f.) Aerial photographs (with a scale of 1" = 50') of the entire property were used as supplemental information.

I.B.3.:

Some raw data was presented, but some gaps exist from information which has not been submitted. All boring logs and well completion diagrams have been submitted. Raw data from lab permeabilities performed on shelby tube samples has been submitted on all wells that the test was performed on except wells 2, 5, and 14. Results were submitted for grain size analyses and cation exchange capacity analyses.

I.B.5.:

a.) A narrative description of the site geology was provided, but it is inadequate because it does not address information obtained from recently installed monitor wells. It only addresses information obtained from borings and monitor wells 1 through 6. It does not address MW 1D through 5D or MW 7 through 14.

b.) Three geologic cross sections have been have been prepared deplicting the following areas:

1. West from MW 2 & 2D to MW 1 & 1D.
2. Southeast from MW 6 to the railroad track passing through the retention reservoir and MW 5 & 5D.
3. West from B-1 to well hole 6. This is labeled as A to A', runs from west to east, and is located approximately 500 feet south of the old retention reservoir which has been dewatered.

c.) No geologic or soil maps have been prepared.

d.) Boring and coring logs have been prepared for all such holes. The drilling company, type of equipment used for the drilling, and the size of the borehole are missing from several of the logs. The type of drilling equipment and size of borehole is missing from all borings drilled in 1968. The size of the borehole and the type of the drilling equipment used is missing from all the well/boring logs for the monitor wells. The name of the drilling company that installed the wells was not documented for monitor wells 1D through 5D and wells 7 through 14.

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f.) A narrative description of the groundwater flow has been submitted, but it is inadequate because it only addresses data obtained from MW 1 through 6. No calculations have been made.

h.) Two hydrologic cross sections have been prepared which show geology and water levels that were measured on July 28, 1987. The two sections deplict the following areas:

1. West from MW 2 & 2D to MW 1 & 1D.
2. Southeast from MW 6 to the railroad tracks passing through the retention reservoir and MW 5 & 5D.

I.B.6.:

The owner has obtained a USGS topographic map (7.5 minute series) of the area which delineates the facility.

a.) The map does illustrate surficial geology, but this area is flat land and little surficial geology exists.

c.) The facility has marked the location of the facility's two discharging wells.

I.B.7.:

This map will be submitted according to Bob Aten of GeoSciences.

I.B.8.:

A facility site map is being prepared and will be submitted according to Bob Aten.

I.C.1.:

a.) A & H Corporation conducted a geotechnical study in 1968 which entailed 36 borings. No documentation was provided to establish whether the borings were drilled under the supervision of a qualified professional. The 19 monitor wells were installed under the supervision of a qualified geologist from GeoSciences.

b.) The location of the monitor wells was a joint agreement between Keystone, GeoSciences, IEPA, and the USEPA. No documentation was provided for the selection of the location of the boreholes drilled by A & H. A notation on the boring logs showed that the project name was "Proposed Water Treatment Facility".

c.) It appears 5 of 13 test wells drilled in 1938 & 1939 were drilled to a shale layer which varies in depth from approximately 20 feet to an undetermined depth that is greater than 177 feet due to this formation dropping off sharply into the river valley. Seven of the 36 borings completed in 1968 were drilled into this shale layer. Only 2 of the 19 monitor wells were drilled to this depth. W 5D encountered the shale at a depth of 36 feet. Monitor well encountered this shale at 22 feet.

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d.) All monitor wells were installed by using a hollow stem auger. MWs 9, 10, and 11 were installed with a minuteman rig, which necessitated taking grab samples instead of shelby tube or split spoons. No documentation was provided on the type of equipment used to drill the borings completed in 1968. It appears some split spoon samples were taken in 1968, but not on all the borings. Therefore, one cannot conclude that all borings were installed using a hollow stem auger.

g.) See comment for I.C.1.a.).

h.) The items in this section checked yes are provided on the boring log sheets for the monitor wells installed between 1986 and 1988. Limited information is provided in the logs for borings completed in 1968. The first column on the checklist for this section refers to the monitor wells, while the second column refers to the borings completed in 1968.

1. No documentation is provided on who logged the sample corings.
2. The water content percentage is noted on the boring logs for each sample taken.
3. The reason for the termination of the borehole is stated when the reason was refusal. The reason is not stated for termination in other cases. Refusal is stated for the reason in 7 of the 36 cases.

i.) Analytical tests were performed on shelby tube samples obtained from 6 of the 19 monitor wells. The tests checked yes on the checklist have been performed on most of the monitor wells. Shelby tube samples were obtained from monitor wells 2, 5, 7, 8, 12, 13, and 14. The sample obtained from monitor well 14 has not yet had the analytical tests performed on it as of March 14, 1988.

I.D.2.:

Only one permeability test has been performed on the shale confining layer. Monitor well 12 encountered this shale at a depth of 22 feet. The well was drilled to 23 feet and then discontinued. The permeability for this one-foot section was 4.5×10^{-8}.

I.D.3.:

The shale bedrock layer appears to dip gently towards the east until about 1,000 to 1,500 feet east of the Chicago and Northwestern Railroad where the rock surface appears to dip steeply into the entrenched river valley. This layer is not considered to be continuous since it dips into the Illinois River. This layer may also be fractured or interbedded with sand lenses, limestone, or coal.

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I.D.6.&7.:

No laboratory data exists to corroborate field data.

I.E.1.:

Three geologic cross sections have been presented. This is an inadequate amount. More cross sections need to be submitted. See comment I.B.5.b.) for cross section locations. At a minimum additional cross sections should be presented for areas parallel to the ditches that were used to transport the hazardous waste.

I.F.1.:

a.) No documentation was provided as to who measured the well casings. Daily & Associates Engineers, Inc., surveyed the site according to Bob Aten.

h.) The static water level was measured in all wells. The wells differ in the length of the screened interval and depth. Wells 1 through 6 were constructed with a 5-foot well screen. Wells 7 through 14 were constructed with a 10-foot well screen. Wells 1 through 14 are shallow wells. Wells 1D through 5D are deep wells and were constructed with a 5-foot well screen.

j.) Two cross sections have been prepared deplicting geology and water levels. The first cross section deplicts the area from monitor wells 2 & 2D to wells 1 & 1D. The second cross section deplicts the area from W-6 to the railroad 250 feet east of W 5 & 5D.

I.F.2.:

a.) A drop in static water levels was observed after the dewatering of the ditches in November of 1986.

b.) Dr. Robert Aten's geologic and hydrologic summary, dated October 5, 1985, discusses water patterns at the site briefly. This is inadequate because it does not address information obtained from recently installed monitor wells.

d.) The retention reservoir water levels and the water levels in the ditches are higher than the water levels in monitor wells. Therefore, a vertical flow may exist between these areas.

I.F.3.:

a.) Single well tests were performed on monitor wells 1 through 6. Tests should also be performed on the remaining wells.

b.) These tests were performed by removing a known volume of water and recording the rate of recovery.

d.) Hydraulic conductivity tests have been performed on only 6 of the 19 monitor wells. The reliability of this data is based on the test, since it has never been repeated.

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g.) Lab permeabilities were performed on shelby tube samples obtained from wells 2, 5, 7, 8, 12, and 13.

I.F.4.:

a.) Three cross sections have been prepared deplicting the geology beneath the site. Additional cross sections need to be prepared to further define the geology. At a minimum cross sections should be prepared deplicting the geology parallel to the ditches (N-S). Currently, cross sections exist which only deplict the E-W axis. See I.B.5.b.) to see which areas have been deplicted by the cross sections. This uppermost zone could be further defined by additional borings where distances between (boreholes/monitor wells) is great.

I.F.4.:

b.) & c.) The confining shale layer appears to have a low permeability. The only permeability of this unit was obtained from a shelby tube sample obtained from monitor well 12 at a depth of 22 to 23 feet. The lab permeability was 4.5×10^{-8}. This unit is not continuous because it slopes steeply into the entrenched bedrock valley to the east. The permeability was determined using the following method: falling head utilizing back pressure and confining pressure.

d.) The facility has failed to submit sufficient information on the confining shale formation to rule out the potential of hydraulic communication. Only one permeability test has been performed on the shale on a one-foot sample of monitor well 12. The thickness of this formation is also not known. This Pennsylvanian bedrock has some interbedded sandstone, limestone, and coal. The sandstone and limestone where fractured may yield water according to the Illinois State Geologic Survey.

I.G.1.:

d.) Drilling equipment was steam cleaned prior to the drilling of wells 1 through 6. The equipment was hosed off prior to the drilling of the other wells.

g.) Samples were obtained using the following methods on the following wells:

Split Spoon	Shelby Tube	Grab
W 1D through 5D	W 2	W 1
W 2	W 5	W 3
W 5	W 6	W 4
W 6	W 7	W 5
W 7	W 8	W 9 through 11
W 8	W 12 through 14	
W 12 through 14		

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Lab permeabilities were performed on samples obtained from wells 2, 5, 7, 8, 12, and 13. Analysis for cation exchange capacities, grain size, and Atterberg limits were performed on wells 7, 8, 12, 13, and 14. Laboratory analyses for chemicals, pH, and metals were performed on soil and sludge samples obtained from ditches, waste piles, and reservoirs.

I.G.2.:

a.) Wells 1 through 6 and wells 1D through 5D were installed using 2-inch inside diameter (316) stainless steel. These wells have a 5-foot screened interval and have a slot size of 0.006 inches. Wells 7 through 14 were installed using 2-inch inside diameter (304) stainless steel. These wells have a 10-foot screened interval and have a slot size of 0.010 inches.

b.) The dimensions of the filter pack varies from almost no filter pack to 8 feet of filter pack below the screen to a maximum of 2.5 feet of filter pack above the top of the screen. This is covered by a bentonite seal. The filter pack and screens are compatible with the in-situ materials. It is unknown whether or not the well materials were designed for the in-situ materials.

I.G.4.:

a.) This author observed the installation of monitor wells 7 and 13 on December 17, 1987. Pel Plug from Polymer Drilling Systems was used for the bentonite plug. It is a high yielding western bentonite in 1/4-inch pellet form. The seal was installed by dropping the material down the hole. The seal was not tamped into place. The type of bentonite and method of installation was not specified in any documents submitted to the Agency.

b.) A cement grout seal was installed above the bentonite seal to the ground surface. It is a mixture of Portland Cement Type I and powdered bentonite. It was installed by dropping the material down the hole, but it was not tamped down. This author only observed the installation of monitor wells 7 and 13. Two bumper guards have been installed by monitor well 7. All wells have an aboveground protective casing with locks.

I.H.1.:

b.) Wells distances vary between approximately 175 feet between monitor wells 11 and 4 to a maximum of approximately 500 feet between wells 1 and 9. Wells 3 and 10 are approximately 500 feet apart also. The retention reservoir has a monitor well on each side along the perimeter. It also has a deep well (5D) on the east side. These wells are approximately 450 feet apart when measured along the perimeter of the reservoir.

c.) No documentation from the facility was provided to explain the rationale for the location of the monitor wells. Dr. Aten said that the locations were selected to monitor "hot spots" for possible contamination. These are areas near points of discharge for the hazardous waste.

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I.H.2.:

a.) The owner has identified the location of all monitor wells at the facility. The facility has not specifically identified which wells are considered to be upgradient. Dr. Aten said that wells 6, 7, and 8 are upgradient.

b.) No documentation has been provided to explain the location of the upgradient monitor wells. Dr. Athen's previous hydrologic and geologic summary does explain that groundwater flows to the east. Therefore, upgradient wells should logically be placed to the west of the facility. Monitor wells 6, 7, and 8 are located to the west of the waste management areas.

I.I.:

The facility does not have an assessment monitoring plan or program.

I.J.1.:

a.) Very little data haa been collected or provided on the confining shale formation.

b.) No subsurface geochemistry work or analysis have been performed. Cation exchange capacity analysis was performed on samples obtained from wells 7, 8, 12, 13, and 14.

c.) Additional borings should be performed along the ditches. Distances in these areas approach 500 feet between borings. The size and extent of sand lenses that were encountered is also unknown.

d.) The narrative description only addresses information obtained from monitor wells 1 through 6 and borings from 1968 or earlier.

e.) See above comment.

I.J.2.:

a.) No horizontal or vertical groundwater flows have been documented or established.

d.) This author participated in recording measurements obtained from monitor wells on February 17, 1988.

e.) No documentation has been provided that addresses water level fluctuations. According to Dr. Aten, water level fluctuations are minor.

f.) Lab permeabilities were performed on monitor wells 2, 5, 7, 8, 12, and 13. Field permeabilities were obtained on monitor wells 1 through 6. Additional field permeabilities should be performed because lab permeabilities only provide a vertical permeability measurement of a 2-foot segment of the core.

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I.J.3.:

The characterization of the uppermost water bearings unit is inadequate because it only addresses information obtained from monitor wells 1 through 6 and borings from 1968.

I.J.5.:

Additional wells need to be installed for an immediate release of hazardous waste constituents to be detected due to the large distances between monitor wells.

I.J.6.:

The facility is not in assessment monitoring.

II.A.:

The numbers, depths, and locations of monitor wells are in agreement with documents (maps & well completion diagrams) that were submitted to the agency. The facility does not have a groundwater monitoring plan.

II.B.1.:

a.) Wells 1 through 6 and wells 1D through 5D were installed using 2-inch I.D. (316) stainless steel. Wells 7 through 14 were installed using 2-inch I.D. (304) stainless steel.

III.A.4.:

According to Dr. Aten, a permanent bench mark has been establish. No documentation has been provided to verify this.

III.B.:

The facility has not addressed the matter of whether immiscible layers could be present or need to be sampled for.

III.D.4.:

No problems occurred during this author's observation of sampling procedures on February 17, 1988. GeoSciences personnel said that problems would be noted if they occurred.

III.E.1.:

Samples for metals are withdrawn first. Samples for volatiles are withdrawn next. This is done to obtain a clearer (less turbid) sample according to Dr. Aten. This is done on all wells whether they are low yielding or not.

III.E.9.:

Dedicated equipment is used for each well.

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IV.A.:

Sample containers are provided by Randolph & Associates, Inc., Randolph is an IEPA contract lab. They properly clean, prepare, and add the proper preservatives to each sample container before it is given to GeoSciences. GeoSciences is the firm performing the sampling.

IV.B.1.2.3.4.5.6.:

Sample containers have the proper preservative for each analysis added prior to sampling. All samples are placed in a cooler with blue ice immediately after sampling each well.

V.B.1.:

Sample seals are not necessary according to Dr. Aten because GeoScience personnel transport the samples to the contract lab personally.

V.C.2.:

p.) This author did not determine if this information was recorded.

V.E.:

The chain of custody sheet also serves as a sample analysis request sheet.

VI.:

The laboratory (Randolph & Associates, Inc.) is a IEPA contract lab. It meets all the requirements of this part.

VII.E.&F.:

All site characteristics appear to match those which are recorded on the map provided by Dr. Aten on February 17, 1988.

VIII.A.:

No statistical analysis has been performed by the owner/operator; therefore, it is not known which program the facility should comply with. The facility does not have an adequate groundwater monitoring program.

VIII.B.:

The current monitoring system, as designed and operated, does not allow for detection of any possible contamination caused by the waste management unit. The monitor wells are spaced too far apart to conclusively detect any possible contamination.

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VIII.C.:

The sampling procedures observed on February 17, 1988 by this author were adequate. The analytical procedures submitted by Randolph and Associates, Inc., which were reviewed by this author, are also adequate. It should be noted that this facility does not have a sampling and analysis plan. It is possible to assess the nature of release, but not the extent of a release of hazardous contaminants.

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APPENDIX A

COMPREHENSIVE GROUND-WATER MONITORING EVALUATION WORKSHEET

The following worksheets have been designed to assist the enforcement officer/technical reviewer in evaluating the ground-water monitoring system an owner/operator uses to collect and analyze samples of ground water. The focus of the worksheets is technical adequacy as it relates to obtaining and analyzing representative samples of ground water. The basis of the worksheets is the final RCRA Ground Water Monitoring Technical Enforcement Guidance Document which describes in detail the aspects of ground-water monitoring which EPA deems essential to meet the goals of RCRA.

Appendix A is not a regulatory checklist. Specific technical deficiencies in the monitoring system can, however, be related to the regulations as illustrated in Figure 4.3 taken from the RCRA Ground-Water Monitoring Compliance Order Guide (COG) (included at the end of the appendix). The enforcement officer, in developing an enforcement order, should relate the technical assessment from the worksheets to the regulations using figure 4.3 from the COG as a guide.

I. Office Evaluation - Technical Evaluation of the Design of the Ground-water Monitoring System

A. Review of relevant documents:

1. What documents were obtained prior to conducting the inspection:

a. RCRA Part A permit application? (Y/N) Y
b. RCRA Part B permit application? (Y/N) N/A
c. Correspondence between the owner/operator and appropriate agencies or citizen's groups? (Y/N) Y
d. Previously conducted facility inspection reports? (Y/N) Y
e. Facility's contractor reports? (Y/N) Y
f. Regional hydrogeologic, geologic, or soil reports? (Y/N) Y
g. The facility's Sampling and Analysis Plan? (Y/N) N
h. Ground-water Assessment Program Outline (or Plan, if the facility is in assessment monitoring)? (Y/N) N
i. Other (specify) _____

B. Evaluation of the Owner/Operator's Hydrogeologic Assessment:

1. Did the owner/operator use the following direct techniques in the hydrogeologic assessment:

a. Logs of the soil borings/rock corings (documented by a professional geologist, soil scientist, or geotechnical engineer)? (Y/N) Y
b. Materials tests (e.g., grain size analyses, standard penetration tests, etc.)? (Y/N) Y
c. Piezometer installation for water level measurements at different depths? (Y/N) N
d. Slug tests? (Y/N) Y

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e. Pump tests? (Y/N) N
f. Geochemical analyses of soil samples? (Y/N) Y
g. Other (specify) (e.g., hydrochemical diagrams and wash analysis) _____

2. Did the owner/operator use the following indirect techniques to supplement direct techniques data:

a. Geophysical well logs? (Y/N) N
b. Tracer studies? (Y/N) N
c. Resistivity and/or electromagnetic conductance? (Y/N) N
d. Seismic Survey? (Y/N) N
e. Hydraulic conductivity measurements of cores? (Y/N) Y
f. Aerial photography? (Y/N) Y
g. Ground penetrating radar? (Y/N) N
h. Other (specify) _____

3. Did the owner/operator document and present the raw data from the site hydrogeologic assessment? (Y/N) Y

4. Did the owner/operator document methods (criteria) used to correlate and analyze the information? (Y/N) Y

5. Did the owner/operator prepare the following:

a. Narrative description of geology? (Y/N) Y
b. Geologic cross sections? (Y/N) Y
c. Geologic and soil maps? (Y/N) N
d. Boring/coring logs? (Y/N) Y
e. Structure contour maps of the differing water bearing zones and confining layer? (Y/N) N
f. Narrative description and calculation of ground-water flows? (Y/N) Y
g. Water table/potentiometric map? (Y/N) N
h. Hydrologic cross sections? (Y/N) Y

6. Did the owner/operator obtain a regional map of the area and delineate the facility? (Y/N) Y

If yes, does this map illustrate:

a. Surficial geology features? (Y/N) Y
b. Streams, rivers, lakes, or wetlands near the facility? (Y/N) Y
c. Discharging or recharging wells near the facility? (Y/N) N

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7. Did the owner/operator obtain a regional hydrogeologic map? (Y/N) N

If yes, does this hydrogeologic map indicate:

a. Major areas of recharge/discharge? (Y/N) N
b. Regional ground-water flow direction? (Y/N) N
c. Potentiometric contours which are consistent with observed water level elevations? (Y/N) N

8. Did the owner/operator prepare a facility site map? (Y/N) N

If yes, does the site map show:

a. Regulated units of the facility (e.g., landfill areas, impoundments)? (Y/N) ___
b. Any seeps, springs, streams, ponds, or wetlands? (Y/N) ___
c. Location of monitoring wells, soil borings, or test pits? (Y/N) ___
d. How many regulated units does the facility have? _____
If more than one regulated unit then,
o Does the waste management area encompass all regulated units? (Y/N) ___
Or
o Is a waste management area delineated for each regulated unit? (Y/N) ___

C. Characterization of Subsurface Geology of Site

1. Soil boring/test pit program:

a. Were the soil borings/test pits performed under the supervision of a qualified professional? (Y/N) Y
b. Did the owner/operator provide documentation for selecting the spacing for borings? (Y/N) Y
c. Were the borings drilled to the depth of the first confining unit below the uppermost zone of saturation or ten feet into bedrock? (Y/N) N
d. Indicate the method(s) of drilling:
o Auger (hollow or solid stem) ___ HOLLOW
o Mud rotary ___
o Reverse rotary ___
o Cable tool ___
o Jetting ___
o Other (specify) _____
e. Were continuous sample corings taken? (Y/N) Y

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f. How were the samples obtained (checked method[s])
- o Split spoon — Y
- o Shelby tube, or similar — Y
- o Rock coring — N
- o Ditch sampling — Y
- o Other (explain) — Y

GRAB
Shelby Tube from boat for reservoir + DITCHES

g. Were the continuous sample corings logged by a qualified professional in geology? (Y/N) Y *1.

h. Does the field boring log include the following information:

o Hole name/number?	(Y/N) Y	Y
o Date started and finished?	(Y/N) Y	Y
o Driller's name?	(Y/N) Y	N
o Hole location (i.e., map and elevation)?	(Y/N) Y	Y
o Drill rig type and bit/auger size?	(Y/N) N	N
o Gross petrography (e.g., rock type) of each geologic unit?	(Y/N) Y	Y
o Gross mineralogy of each geologic unit?	(Y/N) Y	Y
o Gross structural interpretation of each geologic unit and structural features (e.g., fractures, gouge material, solution channels, buried streams or valleys, identification of depositional material)?	(Y/N) Y	Y
o Development of soil zones and vertical extent and description of soil type?	(Y/N) Y	Y
o Depth of water bearing unit(s) and vertical extent of each?	(Y/N) Y	*2.
o Depth and reason for termination of borehole?	(Y/N) N	*3.
o Depth and location of any contaminant encountered in borehole?	(Y/N) N	N
o Sample location/number?	(Y/N) Y	Y
o Percent sample recovery?	(Y/N) N	N
o Narrative descriptions of:		
-- Geologic observations?	(Y/N) Y	Y
-- Drilling observations?	(Y/N) Y	Y

i. Were the following analytical tests performed on the core samples:
- o Mineralogy (e.g., microscopic tests and x-ray diffraction)? (Y/N) N
- o Petrographic analysis:
  - degree of crystallinity and cementation of matrix? (Y/N) N
  - degree of sorting, size fraction (i.e., sieving), textural variations? (Y/N) Y

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- rock type(s)? (Y/N) N
- soil type? (Y/N) Y
- approximate bulk geochemistry? (Y/N) N
- existence of microstructures that may effect or indicate fluid flow? (Y/N) N

o Falling head tests? (Y/N) Y
o Static head tests? (Y/N) N
o Settling measurements? (Y/N) N
o Centrifuge tests? (Y/N) N
o Column drawings? (Y/N) N

D. Verification of subsurface geological data

1. Has the owner/operator used indirect geophysical methods to supplement geological conditions between borehole locations? (Y/N) N
2. Do the number of borings and analytical data indicate that the confining layer displays a low enough permeability to impede the migration of contaminants to any stratigraphically lower water-bearing units? (Y/N) N
3. Is the confining layer laterally continuous across the entire site? (Y/N) N
4. Did the owner/operator consider the chemical compatibility of the site-specific waste types and the geologic materials of the confining layer? (Y/N) N
5. Did the geologic assessment address or provide means for resolution of any information gaps of geologic data? (Y/N) N
6. Do the laboratory data corroborate the field data for petrography? (Y/N) *
7. Do the laboratory data corroborate the field data for mineralogy and subsurface geochemistry? (Y/N) *

E. Presentation of geologic data

1. Did the owner/operator present geologic cross sections of the site? (Y/N) Y
2. Do cross sections:
   a. identify the types and characteristics of the geologic materials present? (Y/N) Y
   b. define the contact zones between different geologic materials? Y
   c. note the zones of high permeability or fracture? (Y/N) N
   d. give detailed borehole information including:
      o location of borehole? (Y/N) Y
      o depth of termination? (Y/N) Y
      o location of screen (if applicable)? (Y/N) Y
      o depth of zone(s) of saturation? (Y/N) N
      o backfill procedure?

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3. Did the owner/operator provide a topographic map which was constructed by a licensed surveyor? (Y/N) N
4. Does the topographic map provide:
   a. contours at a maximum interval of two-feet? (Y/N) ___
   b. locations and illustrations of man-made features (e.g., parking lots, factory buildings, drainage ditches, storm drains, pipelines, etc.)? (Y/N) ___
   c. descriptions of nearby water bodies? (Y/N) ___
   d. descriptions of off-site wells? (Y/N) ___
   e. site boundaries? (Y/N) ___
   f. individual RCRA units? (Y/N) ___
   g. delineation of the waste management area(s)? (Y/N) ___
   h. well and boring locations? (Y/N) ___
5. Did the owner/operator provide an aerial photograph depicting the site and adjacent off-site features? (Y/N) Y
6. Does the photograph clearly show surface water bodies, adjacent municipalities, and residences and are these clearly labelled? (Y/N) Y

F. Identification of Ground-Water Flowpaths

1. Ground-water flow direction

   a. Was the well casing height measured by a licensed surveyor to the nearest 0.01 feet? (Y/N) *
   b. Were the well water level measurements taken within a 24 hour period? (Y/N) Y
   c. Were the well water level measurements taken to the nearest 0.01 feet? (Y/N) Y
   d. Were the well water levels allowed to stabilize after construction and development for a minimum of 24 hours prior to measurements? (Y/N) Y
   e. Was the water level information obtained from (check appropriate one):
      o multiple piezometers placed in single borehole? ___
      o vertically nested piezometers in closely spaced separate boreholes? ___
      o monitoring wells X

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f. Did the owner/operator provide construction details for the piezometers? (Y/N) NA

g. How were the static water levels measured (check method(s).
- o Electric water ~~sounder~~ meter X
- o Wetted tape ___
- o Air line ___
- o Other (explain) ___

h. Was the well water level measured in wells with equivalent screened intervals at an equivalent depth below the saturated zone? (Y/N) N

i. Has the owner/operator provided a site water table (potentiometric) contour map? If yes, No
- o Do the potentiometric contours appear logical and accurate based on topography and presented data? (Consult water level data) (Y/N) ___
- o Are ground-water flow-lines indicated? (Y/N) ___
- o Are static water levels shown? (Y/N) ___
- o Can hydraulic gradients be estimated? (Y/N) ___

j. Did the owner/operator develop hydrologic cross sections of the vertical flow component across the site using measurements from all wells? (Y/N) N

k. Do the owner/operator's flow nets include: NO FLOW NETS
- o piezometer locations? (Y/N) ___
- o depth of screening? (Y/N) ___
- o width of screening? (Y/N) ___
- o measurements of water levels from all wells and piezometers? (Y/N) ___

2. Seasonal and temporal fluctuations in ground-water level

a. Do fluctuations in static water levels occur? (Y/N) Y
- o If yes, are the fluctuations caused by any of the following:
- -- Off-site well pumping (Y/N) N
- -- Tidal processes or other intermittent natural variations (e.g., river stage, etc.) (Y/N) N
- -- On-site well pumping (Y/N) N
- -- Off-site, on-site construction or changing land use patterns (Y/N) Y
- -- Deep well injection (Y/N) N
- -- Seasonal variations (Y/N) N
- -- Other (specify) De-WATERING (Y/N) Y

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b. Has the owner/operator documented sources and patterns that contribute to or affect the ground-water patterns below the waste management? (Y/N) N

c. Do water level fluctuations alter the general ground-water gradients and flow directions? (Y/N) N

d. Based on water level data, do any head differentials occur that may indicate a vertical flow component in the saturated zone? (Y/N) Y

e. Did the owner/operator implement means for gauging long term effects on water movement that may result from on-site or off-site construction or changes in land-use patterns? (Y/N) N

3. Hydraulic conductivity

a. How were hydraulic conductivities of the subsurface materials determined?
   - o Single-well tests (slug tests)? (Y/N) Y
   - o Multiple-well tests (pump tests) (Y/N) N
   - o Other (specify) SEE (g) below Y

b. If single-well tests were conducted, was it done by:
   - o Adding or removing a known volume of water, or (Y/N) Y
   - o Pressurizing well casing (Y/N) N

c. If single well tests were conducted in a highly permeable formation, were pressure transducers and high-speed recording equipment used to record the rapidly changing water levels? (Y/N) NA

d. Since single well tests only measure hydraulic conductivity in a limited area, were enough tests run to ensure a representative measure of conductivity in each hydrogeologic unit? (Y/N) N

e. Is the owner/operator's slug test data (if applicable) consistent with existing geologic information (e.g., boring logs)? (Y/N) Y

f. Were other hydraulic conductivity properties determined? (Y/N) Y

g. If yes, provide any of the following data, if available:
   - o Transmissivity N
   - o Storage coefficient N
   - o Leakage N
   - o Permeability Y
   - o Porosity N
   - o Specific capacity N
   - o Other (specify) _____

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4. Identification of the uppermost aquifer

a. Has the extent of the uppermost saturated zone (aquifer) in the facility area been defined? If yes, (Y/N) Y SEE
o Are soil boring/test pit logs included? (Y/N) Y COMMENT
o Are geologic cross-sections included? (Y/N) Y

b. Is there evidence of confining (competent, unfractured, continuous, and low permeability) layers beneath the site? (Y/N) N
o If yes, how was continuity demonstrated?

_____

_____

c. What is hydraulic conductivity of the confining unit (if present)? 4.5×10^{-8} CM/Sec
How was it determined? _____

d. Does potential for other hydraulic communication exist (e.g., lateral incontinuity between geologic units, facies changes, fracture zones, cross cutting structures, or chemical corrosion/alteration of geologic units by leachage? (Y/N) Y
If yes or no what is the rationale? _____

_____

_____

_____

G. Office Evaluation of the Facility's Ground-Water Monitoring System

Monitoring Well Design and Construction:
These questions should be answered for each different well design present at the facility.

1. Drilling Methods

a. What drilling method was used for the well?
o Hollow-stem auger Y
o Solid-stem auger N
o Mud rotary N
o Air rotary N
o Reverse rotary N
o Cable tool N
o Jetting N
o Air drill with casing hammer N
o Other (specify) _____ N

b. Were any cutting fluids (including water) or additives used during drilling? (Y/N) N
If yes, specify
Type of drilling fluid _____
Source of water used _____
Foam _____
Polymers _____
Other _____

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c. Was the cutting fluid, or additive, identified? (Y/N) NA
d. Was the drilling equipment steam-cleaned prior to drilling the well? (Y/N) X
Other methods _____

e. Was compressed air used during drilling? (Y/N) N
o If yes, was the air filtered to remove oil? (Y/N) NA
f. Did the owner/operator document procedure for establishing the potentiometric surface? (Y/N) N
o If yes, how was the location established?

_____

g. Formation samples
o Were formation samples collected initially during drilling? (Y/N) Y
o Were any cores taken continuous? (Y/N) Y
If not, at what interval were samples taken? _____

o How were the samples obtained?
- Split spoon Y
- Shelby tube Y
- Core drill N
- Other (specify) Grab Y
o Identify if any physical and/or chemical tests were performed on the formation samples (specify) SEE COMMENT PAGE

2. Monitoring Well Construction Materials

a. Identify construction materials (by number) and diameters (ID/OD)

	Material	Diameter (ID/OD)
o Primary Casing	SEE COMMENT PAGE	2" ID
o Secondary or outside casing (double construction)	Steel	4" ID
o Screen	SEE COMMENT PAGE	2" ID

b. How are the sections of casing and screen connected?
o Pipe sections threaded Y
o Couplings (friction) with adhesive or solvent N
o Couplings (friction) with retainer screws N
o Other (specify) _____

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c. Were the materials steam-cleaned prior to installation? (Y/N) N
If no, how were the materials cleaned? Pre-cleaned from mfg.

3. Well Intake Design and Well Development

a. Was a well intake screen installed? (Y/N) Y
o What is the length of the screen for the well?
See Comment # 2a
o Is the screen manufactured? (Y/N) Y
b. Was a filter pack installed? (Y/N) Y
o What kind of filter pack was employed? SAND
o Is the filter pack compatible with formation materials? (Y/N) Y
o How was the filter pack installed? POURED IN HOLE
o What are the dimensions of the filter pack?
o Has a turbidity measurement of the well water ever been made? (Y/N) N
o Have the filter pack and screen been designed for the in situ materials? (Y/N) *
c. Well development
Was the well developed? (Y/N) Y
o What technique was used for well development?
- Surge block N
- Bailer Y
- Air surging N
- Water pumping N
- Other (specify)

4. Annular Space Seals

a. What is the annular space in the saturated zone directly above the filter pack filled with?
- Sodium bentonite (specify type and grit) Y
- Cement (specify neat or concrete)
- Other (specify)
o Was the seal installed by?
- Dropping material down the hole and tamping N
- Dropping material down the inside of hollow-stem auger N
- Tremie pipe method N
- Other (specify) Y
b. Was a different seal used in the unsaturated zone? (Y/N) Y
If yes,
o Was this seal made with?
- Sodium bentonite (specify type and grit) N
- Cement (specify neat or concrete) N
- Other (specify) Y

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o Was this seal installed by?
- Dropping material down the hole and tamping N
- Dropping material down the inside of hollow stem auger N
- Other (specify) Y

c. Is the upper portion of the borehole sealed with a concrete cap to prevent infiltration from the surface? (Y/N) Y
d. Is the well fitted with an above-ground protective device and bumper guards? (Y/N) *
e. Has the protective cover been installed with locks to prevent tampering (Y/N) Y

H. Evaluation of the Facility's Detection Monitoring Program

1. Placement of Downgradient Detection Monitoring Wells

a. Are the ground-water monitoring wells or clusters located immediately adjacent to the waste management area? (Y/N) Y
b. How far apart are the detection monitoring wells?
See Comment Page

c. Does the owner/operator provide a rationale for the location of each monitoring well or cluster? (Y/N) N
d. Has the owner/operator identified the well screen lengths of each monitoring well or clusters? (Y/N) Y
e. Does the owner/operator provide an explanation for the well screen lengths of each monitoring well or cluster? (Y/N) N
f. Do the actual locations of monitoring wells or clusters correspond to those identified by the owner/operator? (Y/N) Y

2. Placement of Upgradient Monitoring Wells

a. Has the owner/operator documented the location of each upgradient monitoring well or cluster? (Y/N) N
b. Does the owner/operator provide an explanation for the location(s) of the upgradient monitoring wells? (Y/N) N
c. What length screen has the owner/operator employed in the background monitoring well(s)?
W-6 5'
W-7 10'
W-8 10'

d. Does the owner/operator provide an explanation for the screen length(s) chosen? (Y/N) N
e. Does the actual location of each background monitoring well or cluster correspond to that identified by the owner/operator? (Y/N) Y

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I. Office Evaluation of the Facility's Assessment Monitoring Program

1. Does the assessment plan specify:
   a. The number, location, and depth of wells? (Y/N) *
   b. The rationale for their placement and identify the basis that will be used to select subsequent sampling locations and depths in later assessment phases? (Y/N) ___
2. Does the list of monitoring parameters include all hazardous waste constituents from the facility? (Y/N) ___
   a. Does the water quality parameter list include other important indicators not classified as hazardous waste constituents? (Y/N) ___
   b. Does the owner/operator provide documentation for the listed wastes which are not included? (Y/N) ___
3. Does the owner/operator's assessment plan specify the procedures to be used to determine the rate of constituent migration in the ground-water? (Y/N) ___
4. Has the owner/operator specified a schedule of implementation in the assessment plan? (Y/N) ___
5. Have the assessment monitoring objectives been clearly defined in the assessment plan? (Y/N) ___
   a. Does the plan include analysis and/or re-evaluation to determine if significant contamination has occurred in any of the detection monitoring wells? (Y/N) ___
   b. Does the plan provide for a comprehensive program of investigation to fully characterize the rate and extent of contaminant migration from the facility? (Y/N) ___
   c. Does the plan call for determining the concentrations of hazardous wastes and hazardous waste constituents in the ground water? (Y/N) ___
   d. Does the plan employ a quarterly monitoring program? (Y/N) ___
6. Does the assessment plan identify the investigatory methods that will be used in the assessment phase? (Y/N) ___
   a. Is the role of each method in the evaluation fully described? (Y/N) ___
   b. Does the plan provide sufficient descriptions of the direct methods to be used? (Y/N) ___
   c. Does the plan provide sufficient descriptions of the indirect methods to be used? (Y/N) ___
   d. Will the method contribute to the further characterization of the contaminant movement? (Y/N) ___
7. Are the investigatory techniques utilized in the assessment program based on direct methods? (Y/N) ___
   a. Does the assessment approach incorporate indirect methods to further support direct methods? (Y/N) ___
   b. Will the planned methods called for in the assessment approach ultimately meet performance standards for assessment monitoring? (Y/N) ___

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c. Are the procedures well defined? (Y/N) ___
d. Does the approach provide for monitoring wells similar in design and construction as the detection monitoring wells? (Y/N) ___
e. Does the approach employ taking samples during drilling or collecting core samples for further analysis? (Y/N) ___

8. Are the indirect methods to be used based on reliable and accepted geophysical techniques? (Y/N) ___
   a. Are they capable of detecting subsurface changes resulting from contaminant migration at the site? (Y/N) ___
   b. Is the measurement at an appropriate level of sensitivity to detect ground-water quality changes at the site? (Y/N) ___
   d. Is the method appropriate considering the nature of the subsurface materials? (Y/N) ___
   e. Does the approach consider the limitations of these methods? (Y/N) ___
   f. Will the extent of contamination and constituent concentration be based on direct methods and sound engineering judgment? (Using indirect methods to further substantiate the findings) (Y/N) ___

9. Does the assessment approach incorporate any mathematical modeling to predict contaminant movement? (Y/N) ___
   a. Will site specific measurements be utilized to accurately portray the subsurface? (Y/N) ___
   b. Will the derived data be reliable? (Y/N) ___
   c. Have the assumptions been identified? (Y/N) ___
   d. Have the physical and chemical properties of the site-specific wastes and hazardous waste constituents been identified? (Y/N) ___

J. Conclusions

1. Subsurface geology

   a. Has sufficient data been collected to adequately define petrography and petrographic variation? (Y/N) N
   b. Has the subsurface geochemistry been adequately defined? (Y/N) N
   c. Was the boring/coring program adequate to define subsurface geologic variation? (Y/N) N
   d. Was the owner/operator's narrative description complete and accurate in its interpretation of the data? (Y/N) N
   e. Does the geologic assessment address or provide means to resolve any information gaps? (Y/N) N

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2. Ground-water flowpaths

a. Did the owner/operator adequately establish the horizontal and vertical components of ground-water flow? (Y/N) N
b. Were appropriate methods used to establish ground-water flowpaths? (Y/N) N
c. Did the owner/operator provide accurate documentation? (Y/N) N
d. Are the potentiometric surface measurements valid? (Y/N) Y
e. Did the owner/operator adequately consider the seasonal and temporal effects on the ground-water? (Y/N) N
f. Were sufficient hydraulic conductivity tests performed to document lateral and vertical variation in hydraulic conductivity in the entire hydrogeologic subsurface below the site? (Y/N) N

3. Uppermost aquifer

a. Did the owner/operator adequately define the uppermost aquifer? (Y/N) N

4. Monitoring Well Construction and Design

a. Do the design and construction of the owner/operator's ground-water monitoring wells permit depth discrete ground-water samples to be taken? (Y/N) Y
b. Are the samples representative of ground-water quality? (Y/N) Y
c. Are the ground-water monitoring wells structurally stable? (Y/N) Y
d. Does the ground-water monitoring well's design and construction permit an accurate assessment of aquifer characteristics? (Y/N) Y

5. Detection Monitoring

a. Downgradient Wells
Do the location, and screen lengths of the ground-water monitoring wells or clusters in the detection monitoring system allow the immediate detection of a release of hazardous waste or constituents from the hazardous waste management area to the uppermost aquifer? (Y/N) N

b. Upgradient Wells
Do the location and screen lengths of the upgradient (background) ground-water monitoring wells ensure the capability of collecting ground-water samples representative of upgradient (background) ground-water quality including any ambient heterogenous chemical characteristics? (Y/N) Y

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6. Assessment Monitoring

a. Has the owner/operator adequately characterized site hydrogeology to determine contaminant migration? (Y/N) *
b. Is the detection monitoring system adequately designed and constructed to immediately detect any contaminant release? (Y/N) ___
c. Are the procedures used to make a first determination of contamination adequate? (Y/N) ___
d. Is the assessment plan adequate to detect, characterize, and track contaminant migration? (Y/N) ___
e. Will the assessment monitoring wells, given site hydrogeologic conditions, define the extent and concentration of contamination in the horizontal and vertical planes? (Y/N) ___
f. Are the assessment monitoring wells adequately designed and constructed? (Y/N) ___
g. Are the sampling and analysis procedures adequate to provide true measures of contamination? (Y/N) ___
h. Do the procedures used for evaluation of assessment monitoring data result in determinations of the rate of migration, extent of migration, and hazardous constituent composition of the contaminant plume? (Y/N) ___
i. Are the data collected at sufficient frequency and duration to adequately determine the rate of migration? (Y/N) ___
j. Is the schedule of implementation adequate? (Y/N) ___
k. Is the owner/operator's assessment monitoring plan adequate? (Y/N) ___
   o If the owner/operator had to implement his assessment monitoring plan, was it implemented satisfactorily? (Y/N) ___

II. Field Evaluation

A. Ground-water monitoring system:
Are the numbers, depths, and locations of monitoring wells in agreement with those reported in the facility's monitoring plan? (See Section 3.2.3) (Y/N) *

B. Monitoring well construction:
1. Identify construction material

	Material	Diameter
a. Primary Casing	SEE COMMENT	PAGE
b. Secondary or outside casing	STEEL	4"

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2. Is the upper portion of the borehole sealed with concrete to prevent infiltration from the surface? (Y/N) Y

3. Is the well fitted with an above-ground protective device? (Y/N) Y

4. Is the protective cover fitted with locks to prevent tampering? (Y/N) Y

If a facility utilizes more than a single well design, answer the above questions for each well design.

III. Review of Sample Collection Procedures

A. Measurement of well depths elevation:

1. Are measurements of both depth to standing water and depth to the bottom of the well made? (Y/N) Y

2. Are measurements taken to the 0.01 feet? (Y/N) Y

3. What device is used?
Electronic WATER LEVEL INDICATOR

4. Is there a reference point established by a licensed surveyor? (Y/N) N

5. Is the measuring equipment properly cleaned between well locations to prevent cross contamination? (Y/N) Y

B. Detection of immiscible layers:

1. Are procedures used which will detect light phase immiscible layers? (Y/N) N

2. Are procedures used which will detect heavy phase immiscible layers? (Y/N) N

C. Sampling of immiscible layers:

1. Are the immiscible layers sampled separately prior to well evacuation? (Y/N) N

2. Do the procedures used minimize mixing with water soluble phases? (Y/N) N

D. Well evacuation:

1. Are low yielding wells evacuated to dryness? (Y/N) Y

2. Are high yielding wells evacuated so that at least three casing volumes are removed? (Y/N) Y

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3. What device is used to evacuate the wells?
teflon bailer with stainless steel line

4. If any problems are encountered (e.g., equipment malfunction) are they noted in a field logbook? (Y/N) *

E. Sample withdrawal:

1. For low yielding wells, are samples for volatiles, pH, and oxidation/reduction potential drawn first after the well recovers? (Y/N) N

2. Are samples withdrawn with either flurocarbon/resins or stainless steel (316, 304 or 2205) sampling devices? (Y/N) Y

3. Are sampling devices either bottom valve bailers or positive gas displacement bladder pumps? (Y/N) Y

4. If bailers are used, is fluorocarbon/resin coated wire, single strand stainless steel wire, or monofilament used to raise and lower the bailer? (Y/N) Y

5. If bladder pumps are used, are they operated in a continuous manner to prevent aeration of the sample? (Y/N) NA

6. If bailers are used, are they lowered slowly to prevent degassing of the water? (Y/N) Y

7. If bailers are used, are the contents transferred to the sample container in a way that minimizes agitation and aeration? (Y/N) Y

8. Is care taken to avoid placing clean sampling equipment on the ground or other contaminated surfaces prior to insertion into the well? (Y/N) Y

9. If dedicated sampling equipment is not used, is equipment disassembled and thoroughly cleaned between samples? (Y/N) NA

10. If samples are for inorganic analysis, does the cleaning procedure include the following sequential steps:
a. Dilute acid rinse (HNO_3 or HCl)? (Y/N) Y

11. If samples are for organic analysis, does the cleaning procedure include the following sequential steps:
a. Nonphosphate detergent wash? (Y/N) Y
b. Tap water rinse? (Y/N) Y

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c. Distilled/deionized water rinse? (Y/N) Y
d. Acetone rinse? (Y/N) Y
e. Pesticide-grade hexane rinse? (Y/N) Y

12. Is sampling equipment thoroughly dry before use? (Y/N) Y

13. Are equipment blanks taken to ensure that sample cross-contamination has not occurred? (Y/N) Y

14. If volatile samples are taken with a positive gas displacement bladder pump, are pumping rates below 100 ml/min? (Y/N) NA

F. In-situ or field analyses:

1. Are the following labile (chemically unstable) parameters determined in the field:
   a. pH? (Y/N) Y
   b. Temperature? (Y/N) Y
   c. Specific conductivity? (Y/N) Y
   d. Redox potential? (Y/N) N
   e. Chlorine? (Y/N) N
   f. Dissolved oxygen? (Y/N) N
   g. Turbidity? (Y/N) N
   h. Other (specify) _____

2. For in-situ determinations, are they made after well evacuation and sample removal? (Y/N) Y

3. If sample is withdrawn from the well, is parameter measured from a split portion? (Y/N) Y

4. Is monitoring equipment calibrated according to manufacturers' specifications and consistent with SW-846? (Y/N) Y

5. Is the date, procedure, and maintenance for equipment calibration documented in the field logbook? (Y/N) N

IV. Review of Sample Preservation and Handling Procedures

A. Sample containers: SEE COMMENT SHEET

1. Are samples transferred from the sampling device directly to their compatible containers? (Y/N) Y

2. Are sample containers for metals (inorganics) analyses polyethylene with polypropylene caps? (Y/N) Y

3. Are sample containers for organics analysis glass bottles with fluorocarbonresin-lined caps? (Y/N) Y

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4. If glass bottles are used for metals samples are the caps fluorocarbonresin-lined? (Y/N) Y

5. Are the sample containers for metal analyses cleaned using these sequential steps?
   a. Nonphosphate detergent wash? (Y/N) Y
   b. 1:1 nitric acid rinse? (Y/N) Y
   c. Tap water rinse? (Y/N) Y
   d. 1:1 hydrochloric acid rinse? (Y/N) Y
   e. Tap water rinse? (Y/N) Y
   f. Distilled/deionized water rinse? (Y/N) Y

6. Are the sample containers for organic analyses cleaned using these sequential steps?
   a. Nonphosphate detergent/hot water wash? (Y/N) Y
   b. Tap water rinse? (Y/N) Y
   c. Distilled/deionized water rinse? (Y/N) Y
   d. Acetone rinse? (Y/N) Y
   e. Pesticide-grade hexane rinse? (Y/N) Y

7. Are trip blanks used for each sample container type to verify cleanliness? (Y/N) Y

B. Sample preservation procedures: SEE COMMENT SHEET

1. Are samples for the following analyses cooled to 4°C:
   a. TOC? (Y/N) ___
   b. TOX? (Y/N) ___
   c. Chloride? (Y/N) ___
   d. Phenols? (Y/N) ___
   e. Sulfate? (Y/N) ___
   f. Nitrate? (Y/N) ___
   g. Coliform bacteria? (Y/N) ___
   h. Cyanide? (Y/N) ___
   i. Oil and grease? (Y/N) ___
   j. Hazardous constituents (§261, Appendix VIII)? (Y/N) ___

2. Are samples for the following analyses field acidified to pH <2 with HNO_3:
   a. Iron? (Y/N) ___
   b. Manganese? (Y/N) ___
   c. Sodium? (Y/N) ___
   d. Total metals? (Y/N) ___
   e. Dissolved metals? (Y/N) ___
   f. Fluoride? (Y/N) ___
   g. Endrin? (Y/N) ___
   h. Lindane? (Y/N) ___
   i. Methoxychlor? (Y/N) ___
   j. Toxaphene? (Y/N) ___

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k. 2,4, D? (Y/N) ___
l. 2,4,5, TP Silvex? (Y/N) ___
m. Radium? (Y/N) ___
n. Gross alpha? (Y/N) ___
o. Gross beta? (Y/N) ___

3. Are samples for the following analyses field acidified to pH <2 with H_2SO_4: (Y/N) ___
a. Phenols? (Y/N) ___
b. Oil and grease? (Y/N) ___

4. Is the sample for TOC analyses field acidified to pH <2 with HCl? (Y/N) ___

5. Is the sample for TOX analysis preserved with 1 ml of 1.1 M sodium sulfite? (Y/N) ___

6. Is the sample for cyanide analysis preserved with NaOH to pH >12? (Y/N) ___

C. Special handling considerations:
1. Are organic samples handled without filtering? (Y/N) Y

2. Are samples for volatile organics transferred to the appropriate vials to eliminate headspace over the sample? (Y/N) Y

3. Are samples for metal analysis split into two portions? (Y/N) N

4. Is the sample for dissolved metals filtered through a 0.45 micron filter? (Y/N) Y

5. Is the second portion not filtered and analyzed for total metals? (Y/N) NA

6. Is one equipment blank prepared each day of ground-water sampling? (Y/N) Y

V. Review of Chain-of-Custody Prodecures

A. Sample labels
1. Are sample labels used? (Y/N) Y

2. Do they provide the following information:
a. Sample identification number? (Y/N) Y
b. Name of collector? (Y/N) Y
c. Date and time of collection? (Y/N) Y
d. Place of collection? (Y/N) Y
e. Parameter(s) requested and preservatives used? (Y/N) N

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3. Do they remain legible even if wet? (Y/N) Y

B. Sample seals:
1. Are sample seals placed on those containers to ensure the samples are not altered? (Y/N) N

C. Field logbook:
1. Is a field logbook maintained? (Y/N) Y

2. Does it document the following:
a. Purpose of sampling (e.g., detection or assessment)? (Y/N) N
b. Location of well(s)? (Y/N) Y
c. Total depth of each well? (Y/N) N
d. Static water level depth and measurement technique? (Y/N) Y
e. Presence of immiscible layers and detection method? (Y/N) N
f. Collection method for immiscible layers and sample identification numbers? (Y/N) N
g. Well evacuation procedures? (Y/N) N
h. Sample withdrawal procedure? (Y/N) N
i. Date and time of collection? (Y/N) Y
j. Well sampling sequence? (Y/N) Y
k. Types of sample containers and sample identification number(s)? (Y/N) N
l. Preservative(s) used? (Y/N) N
m. Parameters requested? (Y/N) N
n. Field analysis data and method(s)? (Y/N) Y
o. Sample distribution and transporter? (Y/N) N
p. Field observations? (Y/N) *
o Unusual well recharge rates? (Y/N) —
o Equipment malfunction(s)? (Y/N) —
o Possible sample contamination? (Y/N) —
o Sampling rate? (Y/N) —

D. Chain-of-custody record:
1. Is a chain-of-custody record included with each sample? (Y/N) Y
2. Does it document the following:
a. Sample number? (Y/N) Y
b. Signature of collector? (Y/N) Y
c. Date and time of collection? (Y/N) Y
d. Sample type? (Y/N) Y
e. Station location? (Y/N) Y
f. Number of containers? (Y/N) Y
g. Parameters requested? (Y/N) Y
h. Signatures of persons involved in the chain-of-possession? (Y/N) Y
i. Inclusive dates of possession? (Y/N) Y

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E. Sample analysis request sheet:
   1. Does a sample analysis request sheet accompany each sample? (Y/N) Y *

   2 Does the request sheet document the following:
      a. Name of person receiving the sample? (Y/N) *
      b. Date of sample receipt? (Y/N) *
      c. Laboratory sample number (if different than field number)? (Y/N) *
      d. Analyses to be performed? (Y/N) *

VI. Review of Quality Assurance/Quality Control

A. Is the validity and reliability of the laboratory and field generated data ensured by a QA/QC program? (Y/N) Y
SEE COMMENT SHEET

B. Does the QA/QC program include:
   1. Documentation of any deviations from approved procedures? (Y/N) ___

   2. Documentation of analytical results for:
      a. Blanks? (Y/N) ___
      b. Standards? (Y/N) ___
      c. Duplicates? (Y/N) ___
      d. Spiked samples? (Y/N) ___
      e. Detectable limits for each parameter being analyzed? (Y/N) ___

C. Are approved statistical methods used? (Y/N) ___

D. Are QC samples used to correct data? (Y/N) ___

E. Are all data critically examined to ensure it has been properly calculated and reported? (Y/N) ___

VII. Surficial Well Inspection and Field Observation

A. Are the wells adequately maintained? (Y/N) Y

B. Are the monitoring wells protected and secure? (Y/N) Y

C. Do the wells have surveyed casing elevations? (Y/N) N

D. Are the ground-water samples turbid? (Y/N) N

E. Have all physical characteristics of the site been noted in the inspector's field notes (i.e., surface waters, topography, surface features)? (Y/N) *

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F. Has a site sketch been prepared by the field inspector with a scale, north arrow, location(s) of buildings, location(s) of regulated units, location of monitoring wells, and a rough depiction of the site drainage pattern? (Y/N) Y

VIII. Conclusions

A. Is the facility currently operating under the correct monitoring program according to the statistical analyses performed by the current operator? (Y/N) *

B. Does the ground-water monitoring system, as designed and operated, allow for detection or assessment of any possible ground-water contamination caused by the facility? (Y/N) N

C. Does the sampling and analysis procedures permit the owner/operator to detect and, where possible, assess the nature and extent of a release of hazardous constituents to ground water from the monitored hazardous waste management facility? (Y/N) N

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Date: 3-14-88

Time: 1000A to 400P

Photographed By:

TIM CASE

Location:

LPC 143 005 0001

Bartonville/Keystone

Peoria Co.

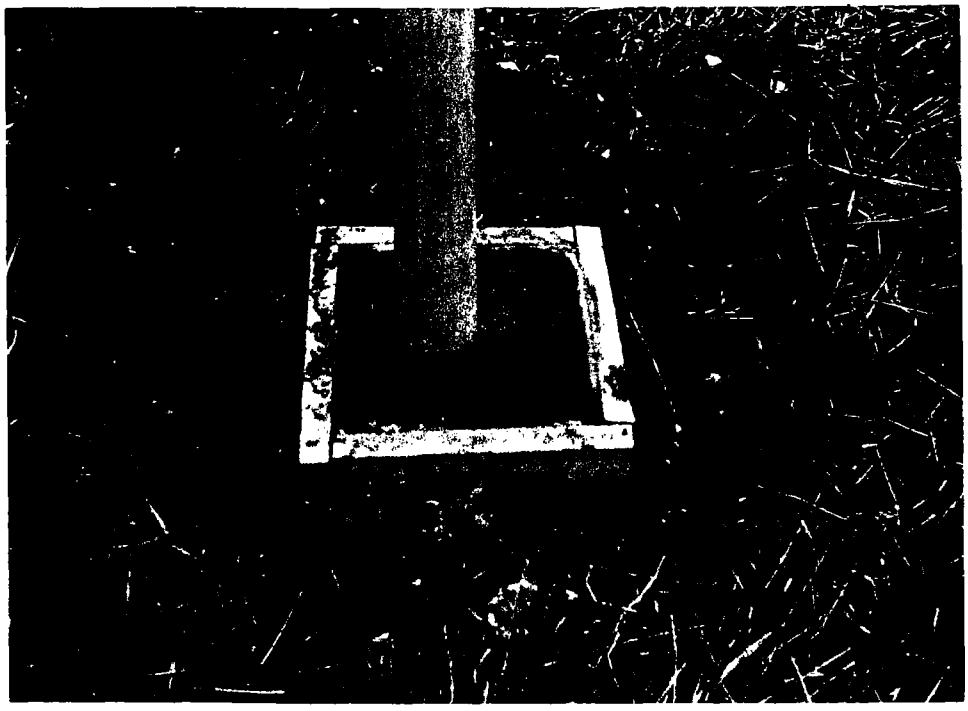
Comments: Photograph taken

toward the EAST

Well - 11

Photograph Number: 1

Roll Number: 88-026-00



Date: 3-14-88

Time: 1000A to 400P

Photographed By:

TIM CASE

Location:

LPC 143 005 0001

Bartonville/Keystone

Peoria Co.

Comments: Photograph taken

toward the West

W-10

Photograph Number: 2

Roll Number: 88-026-01

Date: 3-14-88

Time: 1000A to 400P

Photographed By:

TIM CASE

Location:

LPC 143 005 0001

Bartonville/Keystone

Peoria Co.

Comments: Photograph taken

toward the EAST

W-3

Photograph Number: 3

Roll Number: 88-026-02

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Date: 3-14-88

Time: 1000A to 400P

Photographed By:

TIM CASE

Location:

LPC 143 005 0001

Bartonville/Keystone

Peoria Co.

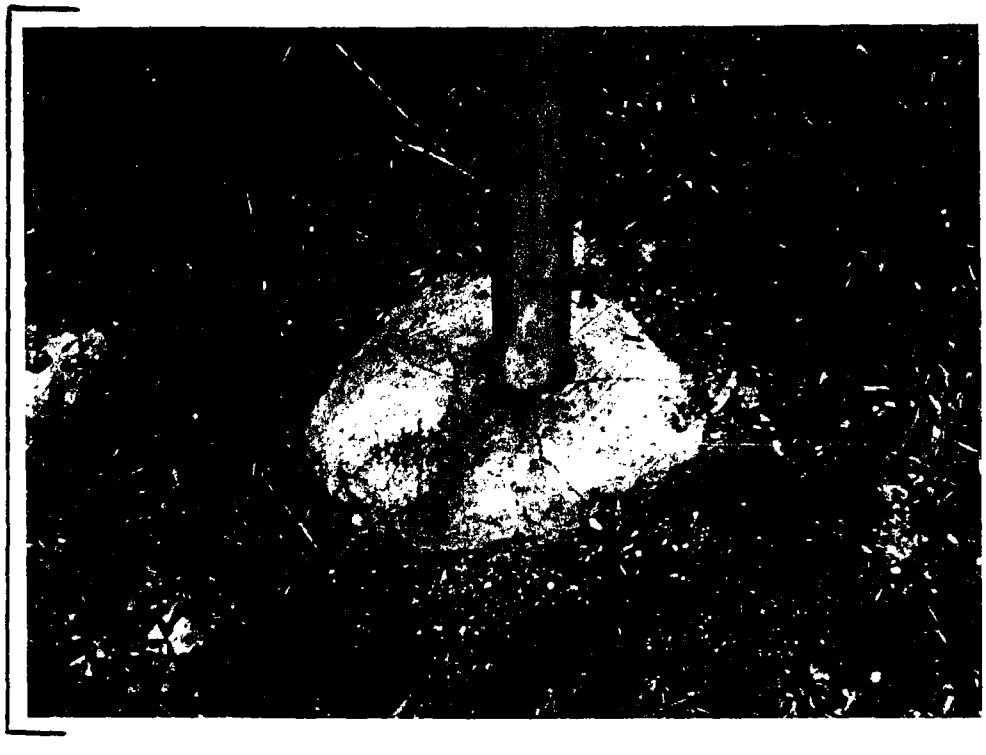
Comments: Photograph taken

toward the EAST

W-3D

Photograph Number: 4

Roll Number: 88-026-03



Date: 3-14-88

Time: 10^00A to 4^00P

Photographed By:

TIM CASE

Location:

LPC 143 005 0001

Bartonville/Keystone

Peoria Co.

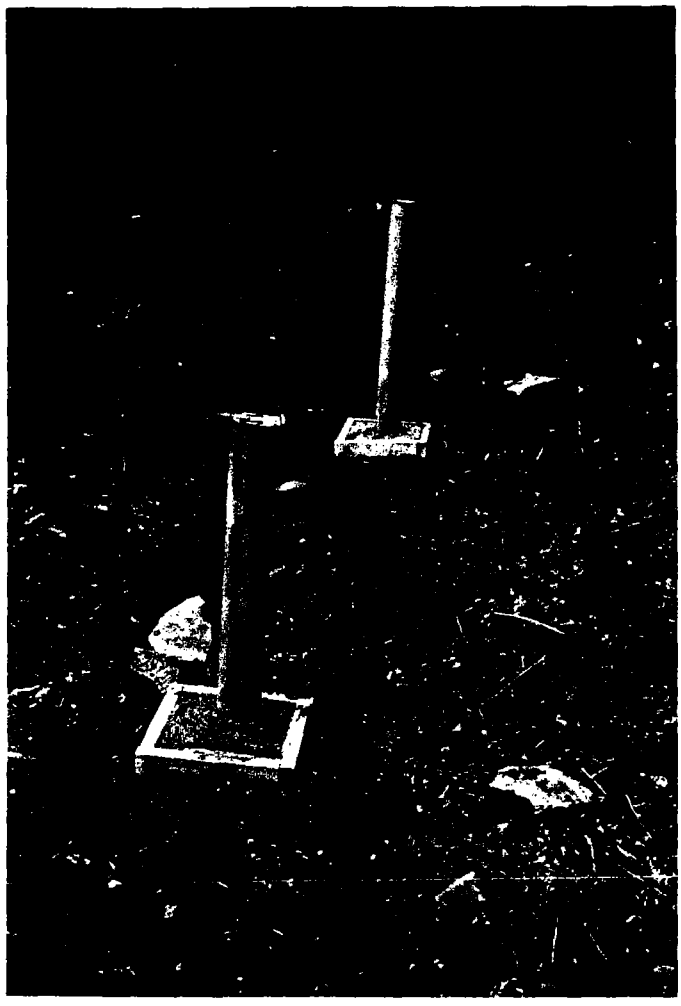
Comments: Photograph taken

toward the North

W1 + 1D

Photograph Number: 5

Roll Number: 88-026-04



Date: 3-14-88

Time: 10^00A to 4^00P

Photographed By:

TIM CASE

Location:

LPC 143 005 0001

Bartonville/Keystone

Peoria Co.

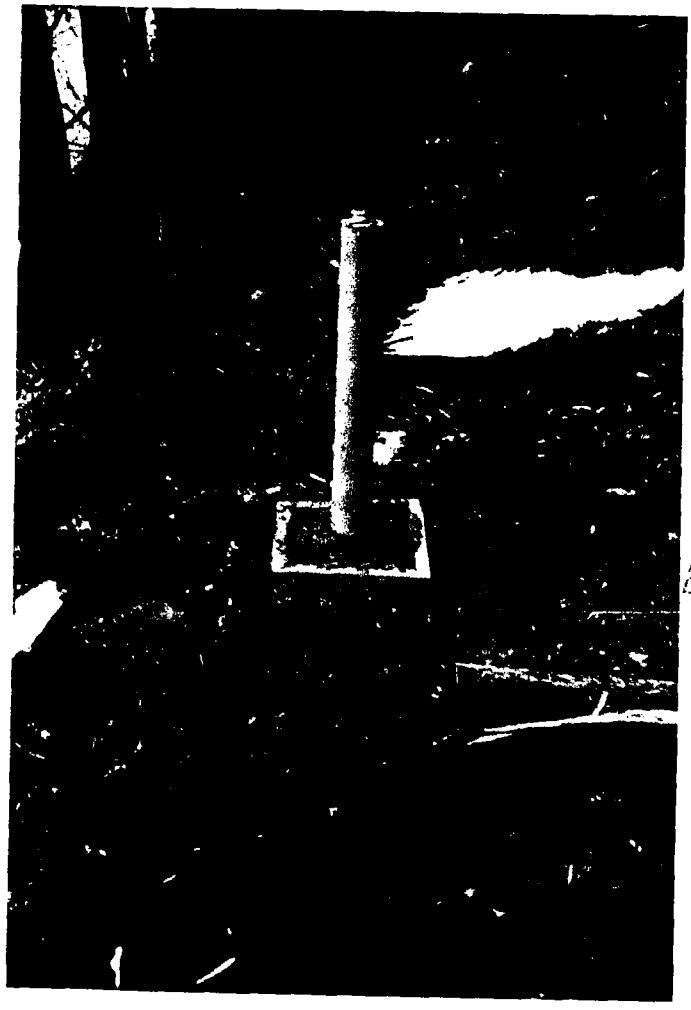
Comments: Photograph taken

toward the NORTH

W-9

Photograph Number: 6

Roll Number: 88-026-05



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Date: 3-14-88

Time: 1000A to 400P

Photographed By:

TIM CASE

Location:

LPC 143 005 0001

Bartonville/Keystone

Peoria Co.

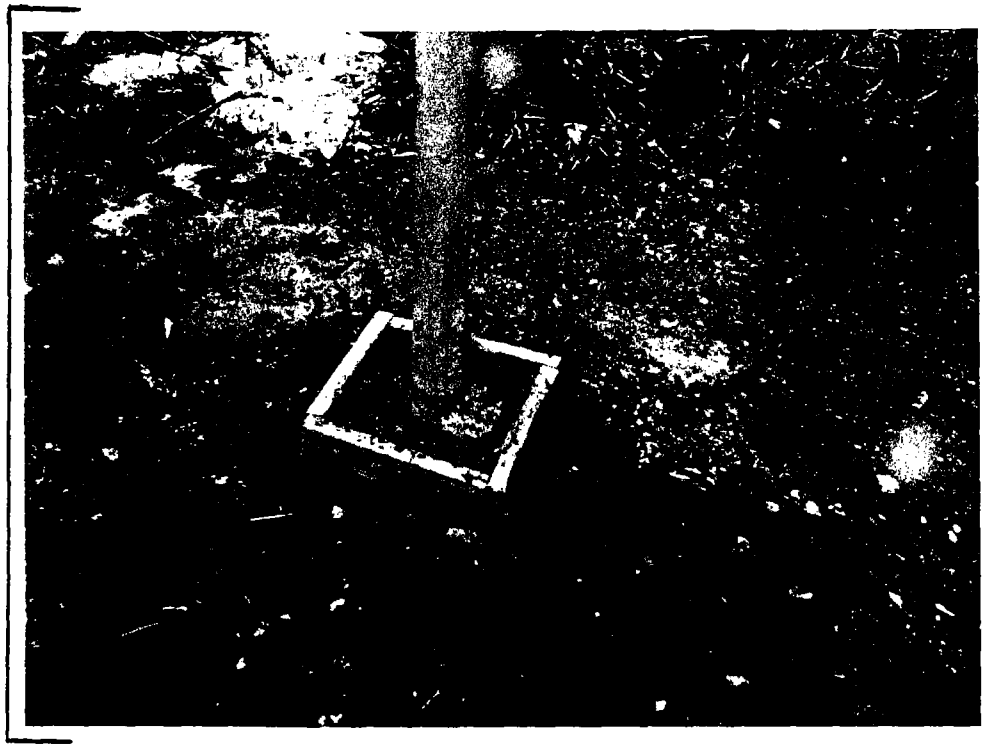
Comments: Photograph taken

toward the NORTH

W-8

Photograph Number: 7

Roll Number: 88-026-06



Date: 3-14-88

Time: 1000A to 400P

Photographed By:

TIM CASE

Location:

LPC 143 005 0001

Bartonville/Keystone

Peoria Co.

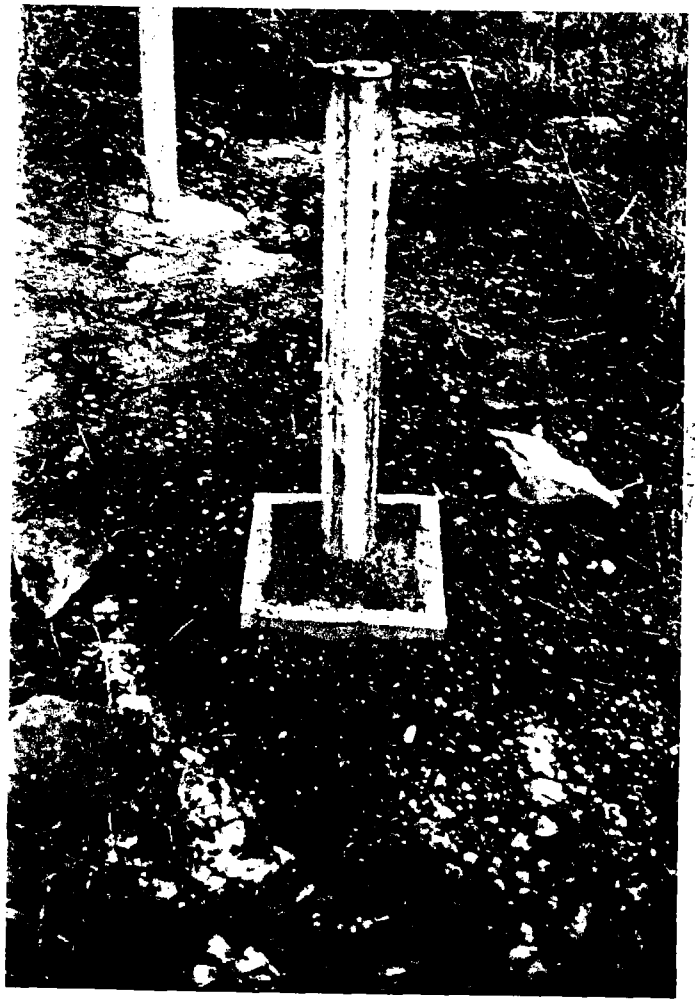
Comments: Photograph taken

toward the North

W-2

Photograph Number: 8

Roll Number: 88-026-07



Date: 3-14-88

Time: 1000A to 400P

Photographed By:

TIM CASE

Location:

LPC 143 005 0001

Bartonville/Keystone

Peoria Co.

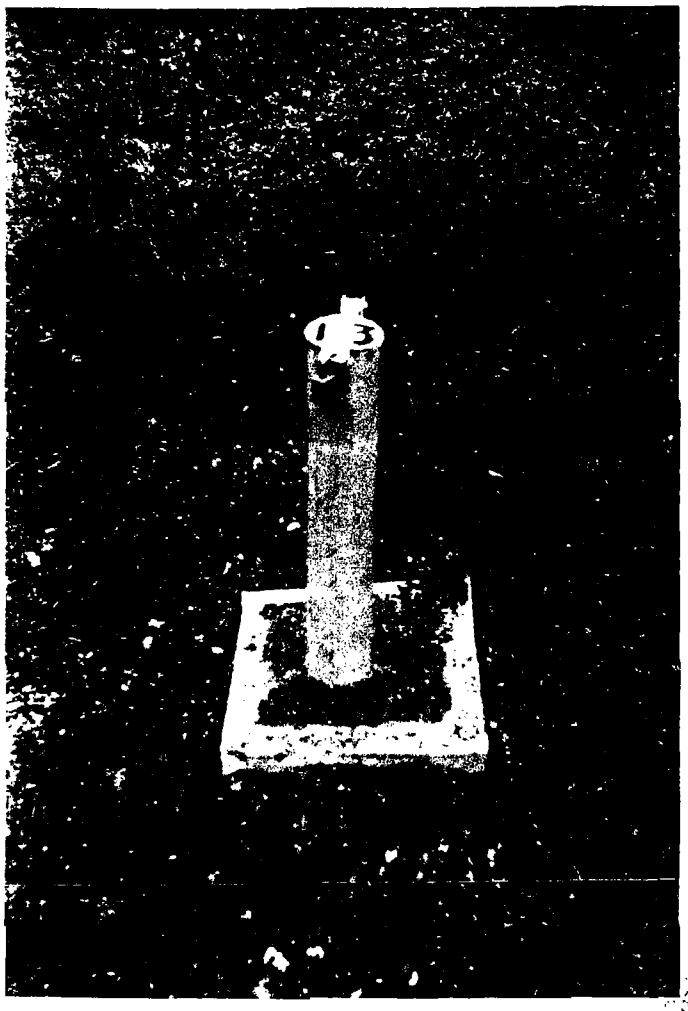
Comments: Photograph taken

toward the SOUTH

W-13

Photograph Number: 9

Roll Number: 88-026-08



Date: 3-14-88

Time: 1000A to 400P

Photographed By:

TIM CASE

Location:

LPC 143 005 0001

Bartonville/Keystone

Peoria Co.

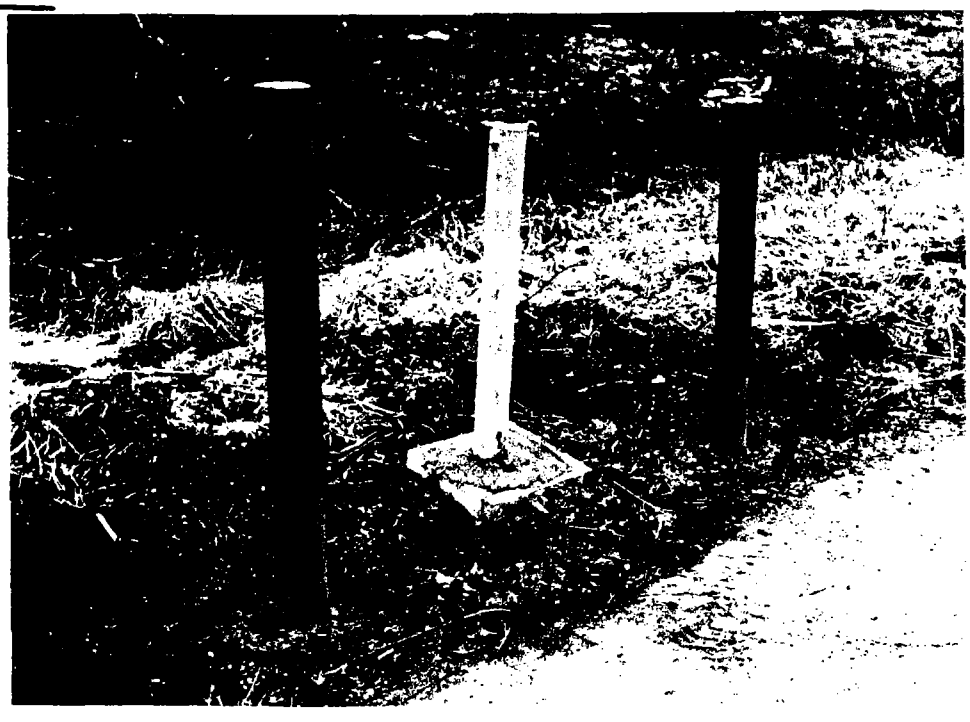
Comments: Photograph taken

toward the Northwest

W-7

Photograph Number: 10

Roll Number: 88-026-09



Illinois Environmental Protection Agency 2200 Churchill Road, Springfield, IL 62706

217/782-6761

Refer to: 1430050001 - Peoria County
Bartonville/Keystone
ILD000714861
Compliance File

COMPLIANCE INQUIRY LETTER

Certified # P 274 562 864

April 15, 1988

Keystone Steel and Wire Company
ATTN: Dale Bennington
7000 South Adams
Bartonville, Illinois 61641

Dear Mr. Bennington:

The purpose of this letter is to address the status of the above-referenced facility in relation to the requirements of 35 Ill. Adm. Code Subtitle G and to inquire as to your position with respect to the apparent violations identified in Attachment A and your plans to correct these apparent violations. The Agency's findings of apparent non-compliance in Attachment A are based on an inspection completed on February 23, 1988. For your convenience a copy of the inspection report is enclosed with this letter. Also, other apparent violations from previous inspections remain unresolved.

Please submit in writing, within fifteen (15) calendar days of the date of this letter, the reasons for the identified violations, a description of the steps which have been taken to correct the violations and a schedule, including dates, by which each violation will be resolved. These resolution dates are not to exceed 60 days from the date of the above referenced inspection and/or record review. The written response, and two copies of all documents submitted in reply to this letter, should be sent to the following:

Angela Aye Tin, Manager
Technical Compliance Unit
Compliance Section
Illinois Environmental Protection Agency
Division of Land Pollution Control
2200 Churchill Road
Post Office Box 19276
Springfield, Illinois 62794-9276

Further, take notice that non-compliance with the requirements of the Illinois Environmental Protection Act and rules and regulations adopted thereunder may be the subject of enforcement action pursuant to either the Illinois Environmental Protection Act, Ill. Rev. Stat., Ch. 111 1/2, Sec. 1001 et seq. or the federal Resource Conservation and Recovery Act (RCRA), 42 U.S.C. Sec. 6901 et seq.

If you have any questions regarding the above, please contact John Tripses at 309/693-5462.

Sincerely,

Angela Aye Tin

Angela Aye Tin, Manager
Technical Compliance Unit
Compliance Section
Division of Land Pollution Control

AAT:JT:JR:lab/0961j, 63-64

cc: Division File
Peoria Region
Virginia Yang
Bill Hutton
Dave Jansen
John Richardson
USEPA, Region V

Illinois Environmental Protection Agency 2200 Churchill Road, Springfield, IL 62706

Attachment A

Pursuant to 35 Ill. Adm. Code 703.121(a), no person shall conduct any hazardous waste storage, hazardous waste treatment or hazardous waste disposal operation:

1. Without a RCRA permit for the HWM (hazardous waste management) facility; or

2. In violation of any condition imposed by a RCRA permit.

You are in apparent violation of 35 Ill. Adm. Code 703.121(a) for the following reason(s): Your facility stored hazardous waste in a surface impoundment without a RCRA permit.

AAT:JT:JR:lab/0961j, 65

Complaint # 143 005 0001

SENDER: Complete items 1 and 2 when additional services are desired, and complete items 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 additional service(s) requested.
1. ☑ Show to whom delivered, date, and addressee's address. †(Extra charge)† 2. ☐ Restricted Delivery †(Extra charge)† 24

3. Article Addressed to: Keystone Steel + Wire Co Attn: Dale Bennington 7000 S Adams Bartonville Ill 61641	4. Article Number P 594 562 864
	Type of Service: ☐ Registered ☐ Insured ☒ Certified ☐ COD ☐ Express Mail
	Always obtain signature of addressee or agent and DATE DELIVERED.
5. Signature — Addressee X	8. Addressee's Address (ONLY if requested and fee paid)
6. Signature — Agent X	
7. Date of Delivery 4-19-88	

PS Form 3811, [illegible] DOMESTIC RETURN RECEIPT

Attn: Dale Bennington
P 594 562 864

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL 24

(See Reverse)

Sent to Keystone Steel + Wire Co	
Street and No. 7000 S Adams	
P.O., State and ZIP Code Bartonville Ill 61641	
Postage	$ 45
Certified Fee	80
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to whom and Date Delivered	75
Return receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	$ 2.20
Postmark or Date	

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PEORIA, ILL. APR 18 1988 USPO

★ U.S.G.P.O. 1983-403-517

PS Form 3800, Feb. 1982

STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY
INSPECTION REPORT

USEPA Number: ILD000714881 IEPA Number: 143 005 0001

Facility Name: Keystone Group Bartonville Plant (Keystone Steel and Wire Co.)

Street: 7000 South Adams
City: Bartonville Telephone: 309/697-7020
County: Peoria State: IL Zip Code: 61641

Type of Facility: Notified As: Generator/Trans Regulated As: Generator/Storage
LDF? yes X no __ HPV? yes __ no X 90 Day Follow-up Required? yes __ no X

Region: 3 Date of Inspection: Nov 28, 1988 From: 9:00 am to 4:00 pm
Weather (LDF Only): _____

Type of Inspection
ISS: X Sampling: __ Citizen Complaint: __ Closed: __ Withdrawal: __
Record Review: __ Follow-up to Inspection of _____: __ Other: __

Non Regulated Status
Small Quant. Gen:: __ Claimed Nonhandler: __ Other(Specify in narrative): __

Notified As/Regulated As Matrix Number: ____ Key Letter: ____

Notification date, 8/18/80, from initial ✓ or subsequent __ notification.

Part A date, 11/18/80, from initial __ or amended __ Part A.

Part B permit application submitted? yes __ no __

Has the firm been referred to: USEPA? yes ✓ no __; IAG? yes __ no ✓; County States Attorney? yes __ no ✓. Date of referral to USEPA: 1/8/85,
IAG: _____, County States Attorney: _____.

Federal Court Order Issued: _____ State Court Order Issued: _____
(CACO)-USEPA : COMPLIANCE ORDER ISSUED: 6/28/85
(CAFO)-USEPA FINAL Order Issued: _____ Illinois PCB Order Issued: _____

TSD Facility Activity Summary

Activity(By Process Code)	On Pt A	Activity Conducted Prior to 1980	Was Activity Ever Done	Closed	Being Done at Time of Inspection	Exempt From Regulation per 35 IAC, Section:	On Annual Report For 87	86	85
S03	Yes	Yes	Stopped in 1976	1978	See Narrative		No	No	No
D80	Yes	Yes	Stopped in 1976	1978	No		No	No	No
T04	Yes	Yes	Yes	No	Yes	703.123(d)	No	No	No
T02	Yes	Yes	Yes	Waste Delisted	No		No	No	No
D83	Yes	Yes	Yes	Waste Delisted	No		No	No	No
S04	No	Yes	Yes	No	Yes		No	No	No

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4

SUMMARY OF APPARENT VIOLATIONS

AREA	CLASS	SECTION
**OTH	I	703.121
*OTH	I	703.150(a)
*OTH	I	722.134(a)
*OTH	I	725.113(a)
*OTH	II	725.115(b)
*OTH	II	725.115(d)
*OTH	II	725.116(a)
*OTH	II	725.116(b)
*OTH	II	725.116(c)
*OTH	II	725.116(d)
*OTH	II	725.152(a)
*OTH	II	725.152(c)
*OTH	II	725.152(e)
*OTH	II	725.153
*OTH	II	725.155
*OTH	II	725.173
***OTH	II	725.174(a)
***OTH	I	725.351
***OTH	I	725.353(a)
***OTH	I	725.353(b)
***OTH	I	725.354

* Apparent violations first observed on an inspection conducted on February 22, 1985 and cited in a CIL dated April 15, 1985.

** Apparent violations first observed on an inspection conducted on February 23, 1988 and cited in a CIL dated April 1, 1988.

*** Apparent violations first observed during this inspection and will be cited in a new CIL.

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WASTE DISPOSITION FORM

Facility Name: Keystone Steel and Wire USEPA #: ILD000714881 IEPA #: 143 005 0001

Waste Name (Include haz & non-haz special & waste for which no determination has been made)	Generating Process (For waste gen. on site. N/A for TSD)	Date of Last Analysis	USEPA Haz Waste #	On 8700-12 *	On 3510-3 *	On Annual Rpt For 87 *	86 *	85 *	Amount On Site	Rate of Generation Amount From 1987 Annual Report	Last Manifested Shipment	Disposition
Arc Dust	Arc Shop	5/88	K061	Y	Y	Y	Y	Y	See Narrative	1,588,730 gallons	8/19/88	See Narrative
1,1,1-Trichloroethane	Nail Degreasing	10/88	F002	N	N	Y	Y	Y	17 barrels	15,287 gallons	11/23/88	See Narrative
Perchloroethylene	General Cleaning	12/86	F001	N	N	Y	Y	N	None	47 gal.	7/28/88	See Narrative
Waste Paint	Fence Department	11/87	F002 D001	N	N	Y	Y	N	2 barrels	660 gal.	11/19/87	See Narrative
Naptha	Die Cleaning	10/88	D001	N	N	Y	N	N	None	337 gal.	5/19/88	See Narrative
Pickle Liquor	Wire Mill		K062	Y	Y	N	N	N	See Narrative	→	→	On Site Treatment

KEYSTONE STEEL & WIRE CO.
1430050001

NARRATIVE

Keystone Steel & Wire Company was inspected on November 28, 1988 by John Tripses and Mitch Smith. Interviewed during the inspection were Dale Bennington (Manager of Energy and Environmental Engineering), Dave Semelroth (Design Engineer), and Tom Ritterbush (Manager of Safety). Keystone manufactures steel bars, rods, fence, posts, and nails. During the manufacturing processes, Keystone generates the following hazardous wastes.

1,1,1 Trichloroethane - F002

This waste is generated from the degreasing of nails. At the time of the inspection there were 15 barrels being accumulated in the South Complex (see photograph 1) and 7 barrels being accumulated in the Wire Mill (see photographs 2 and 3). Two of the barrels in the Wire Mill did not have accumulation dates and were not marked with the words "HAZARDOUS WASTE". In 1988, this waste was sent to the following facilities:

EWR	Clayton Chemical	Safety Kleen
2390 S. Broadway	1 Mobile	633 E. 138th St.
Coal City, IL	Sauget, IL	Dolton, IL
0630200003	1631210004	0310610006
ILD087157251	ILD066918327	ILD980613913
Permit No. 000132	Permit No. 000125	Permit No. 000162

Perchloroethylene - F001

This waste is generated in the maintenance shop during the cleaning of parts. There appeared to be none on-site during the inspection. In 1988, this waste was sent to the following facilities:

Clayton Chemical	Safety Kleen
1 Mobile	633 E. 138th St.
Sauget, IL	Dolton, IL
1631210004	0310610006
ILD066918327	ILD980613913
Permit No. 000125	Permit No. 000035

Naptha - D001

This waste is generated from cleaning dies. There appeared to be none on-site during the inspection. In 1988, this waste was sent to the following facilities:

Clayton Chemical	Safety Kleen
1 Mobile	633 E. 138th St.
Sauget, IL	Dolton, IL
1631210004	0310610006
ILD066918327	ILD980613913
Permit No. 000125	Permit No. 000035

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Waste Paint - D001

This waste is generated in the fence department during painting. There were two barrels being accumulated in the Wire Mill (see photographs 2 and 3) and two barrels being accumulated outside the Wire Mill (see photographs 4, 5, 6, and 7). The two barrels that were outside did not have accumulation dates. There had been no shipments off-site in 1988. The waste paint shipped off-site in 1987 went to the following facility:

LWD
Calvert City, KY
9211570001
KYD088438817

Spent Pickle Liquor - K062

This waste is generated in the Mid Mill and in the Wire Mill. When the acid used for pickling is dirty, it is pumped from the pickling tanks to a 40,000 gallon spent acid tank. From the spent acid tank the acid is pumped to a 10,000 gallon treating tank. In the treating tank, the acid is chilled to 32 degrees F. From the treating tank, the acid is pumped through a centrifuge. Ferrous sulfate heptahydrate crystals are separated from the acid. The acid goes to the 30,000 gallon recovered acid tank and from there back to the pickling tanks. The crystals are sold to Crown Technology, Inc. of Indianapolis, IN. (See attached copy of the contract).

When the acid is so dirty it can no longer be cleaned and when the pickling tanks are cleaned out, the spent pickle liquor flows to a holding tank in the Mid Mill building. There the pH is controlled by adding lime. From there, it flows through a pipe to the wastewater treatment plant where it is further treated. The wastewater from the treatment plant is discharged to the Illinois River under an NPDES permit. The wastewater treatment plant is totally enclosed and permitted by the Division of Water Pollution Control and therefore is exempt from regulation under RCRA by Section 703.123(d). The sludge from the treatment plant is stored in two surface impoundments. The sludge (formerly K063) has been delisted.

The spent pickle liquor used to be mixed with nonhazardous wastewaters and pumped into the south ditch (see photograph 8) and the Mid Mill ditch (see photograph 9). The Mid Mill ditch flows into the south ditch. The south ditch flows into the pump house ditch. From the pump house ditch, the mixture was pumped to the aforementioned wastewater treatment plant. These ditches are regulated as surface impoundments. Keystone does not have a RCRA permit for storage of spent pickle liquor in surface impoundments. An enforcement action was filed against Keystone for this. As a result of this, Keystone quit pumping spent pickle liquor into the

ditches on October 31, 1986. Nonhazardous wastewaters are still pumped into the north ditch and the Mid Mill ditch. Keystone has installed monitor wells around the ditches to determine the extent of groundwater contamination. The activity necessary to close the ditches is currently being negotiated between the USEPA and Keystone.

Arc Dust - K061

This waste is generated in the arc shop. The shop has two electric arc furnaces. The arc dust is collected through an induced draft system along the roof of the arc shop. The arc dust is removed from the airstream by a baghouse. The dust is conveyed to a roll-off box for accumulation. The roll-off boxes used did not have accumulation dates and were not labeled with the words "HAZARDOUS WASTE".

Keystone used to send its arc dust to:

Peoria Disposal Co.
4349 Southport Road
Peoria, IL
1438120003
ILD000805812
Permit No. 790213

The last shipment to PDC was on August 19, 1988. Since then Keystone has made three shipments to:

Continental Cement Co.
P.O. Box 71
Hannibal, MO 63401
Phone No. (314) 221-1740
MOD054018288

The shipment dates and amounts were:

November 7, 1988	2627 tons
November 9, 1988	2083 tons
November 9, 1988	2140 tons

All shipments were made with a manifest (see attached manifests). Continental Cement, according to Mr. Bennington, uses arc dust to make cement. The arc dust is added to a cement kiln as one of the ingredients. The three shipments were made to see if Continental Cement can use the arc dust in its process. Keystone does not have a contract with Continental Cement. Mr. Bennington provided Agency representatives with a copy of Continental Cement's 8700-12 and Part A, a copy of the purchase order for the three shipments, and a letter from the Missouri Department of Natural Resources. They are all attached. The letter from the Missouri Department of Natural Resources addresses the question of whether a material that would be a solid waste and a hazardous waste if disposed of

could be used as an ingredient in a process and not handled as a hazardous waste.

Except for these three shipments, all arc dust that has been generated since the last shipment to PDC has been placed in a pile on Keystone property. Mr. Bennington would not allow a photograph of the pile but it was observed by both Tripses and Smith. The arc dust was placed directly on the ground. A dirt berm was placed around the pile. The pile was approximately 100 feet square and 3 feet above grade. No effort was made to reduce wind erosion or runoff from the pile.

Based on conversations with the RCRA Hotline and a review of the regulations, it appears that the pile of arc dust is regulated as a waste pile. Arc dust is not a normal ingredient used in the manufacture of cement and Keystone does not have a contract with Continental Cement to take the arc dust. Keystone has not provided the necessary documentation required by Section 721.102(f) to prove that the arc dust is not a solid waste.

During the review of documents and site tour, the following apparent violations were observed:

Section 722.134(a) - There were two barrels of waste 1,1,1 trichloroethane in the accumulation area in the Wire Mill that were not marked with accumulation dates and not labeled "HAZARDOUS WASTE". There were two barrels of waste paint in the accumulation area outside the Wire Mill building that were not marked with accumulation dates. The roll-off boxes used to accumulate arc dust were not marked with accumulation dates and not labeled with the words "HAZARDOUS WASTE". The facility was not complying with the requirements of Section 725 Subpart D and Section 725.116.

Section 703.121 - The facility was storing spent pickle liquor (K062) in surface impoundments and arc dust (K061) in a waste pile without a RCRA permit.

Section 703.150(a) - The facility was storing spent pickle liquor (K062) in surface impoundments and arc dust (K061) in a waste pile without a Part A permit.

Section 725.113(b) - The facility did not have a written waste analysis plan.

Section 725.115(b) - The facility did not have a written inspection schedule.

KEYSTONE STEEL & WIRE CO.
1430050001

Section 725.115(d)	- The facility did not have an inspection log.
Section 725.116(a)	- Facility personnel involved in hazardous waste management have not received the required training.
Section 725.116(b)	- Facility personnel involved in hazardous waste management have not received the required training within six months of their date of employment or assignment to a position involving hazardous waste management.
Section 725.116(c)	- Facility personnel have not received the annual update of the training required by Section 725.116(a).
Section 725.116(d)	- The facility does not maintain training records, job names, and job descriptions for facility personnel involved in hazardous waste management.
Section 725.152(a)	- The contingency plan does not describe the actions required to respond to a release of spent pickle liquor (K062), paint waste (D001), and spent perchloroethylene (F001).
Section 725.152(c)	- The contingency plan does not describe the arrangements agreed to by local agencies.
Section 725.152(e)	- The contingency plan does not include a physical description and brief outline of the capabilities of the emergency equipment.
Section 725.153	- The contingency plan has not been submitted to local response agencies.
Section 725.155	- The emergency coordinators are not familiar with the contingency plan because they have not received the training required by Section 725.116.
Section 725.173	- The operating record did not contain any inspection records or schedules and the location and amount of the pickle liquor and arc dust in storage.
Section 725.174(a)	- The waste analysis plan, inspection records, and training records were not available for inspection.

Section 725.351 - The waste pile of arc dust (K061) was not protected from wind dispersion.

Section 725.353(a) - The waste pile of arc dust (K061) is not on an impermeable base, there is no run-on control system, and there is no runoff system which are required because leachate and runoff from the waste pile of arc dust (K061) is a hazardous waste.

Section 725.353(b) - The waste pile of arc dust (K061) is not protected from precipitation and run-on by some other means than required by Section 725.353(a), which is required because leachate and runoff from the waste pile of arc dust (K061) is a hazardous waste.

Section 725.354 - The waste pile of arc dust (K061) does not have the liner and leachate collection system that meets the requirements of Section 724.351.

The apparent violations of Section 722.134(a), Section 703.150(a), Section 725.113(b), Section 725.115(b), Section 725.116(a), Section 725.116(b), Section 725.116(c), Section 725.116(d), Section 725.152(a), Section 725.152(c), Section 725.152(e), Section 725.153, Section 725.155, and Section 725.173 were originally observed during an inspection conducted on February 22, 1985 and cited in a Compliance Inquiry Letter dated April 15, 1985. The apparent violation of Section 703.121 was originally observed during an inspection conducted on February 22, 1985 and cited in a Compliance Inquiry Letter dated April 15, 1985. The apparent violations of Section 725.174(a), Section 725.351, Section 725.353(a), Section 725.353(b), and Section 725.354 have never been cited before in a Compliance Inquiry Letter. The facility will be sent a Compliance Inquiry Letter which will cite the new apparent violations and also say that violations that have been previously cited were again observed. All the above apparent violations will be referred to the Enforcement Decision Group for inclusion in the current enforcement case.

Facility Name: Keystone Steel and Wire Co.

USEPA NUMBER: ILD000714881 IEPA Number: 1430050001

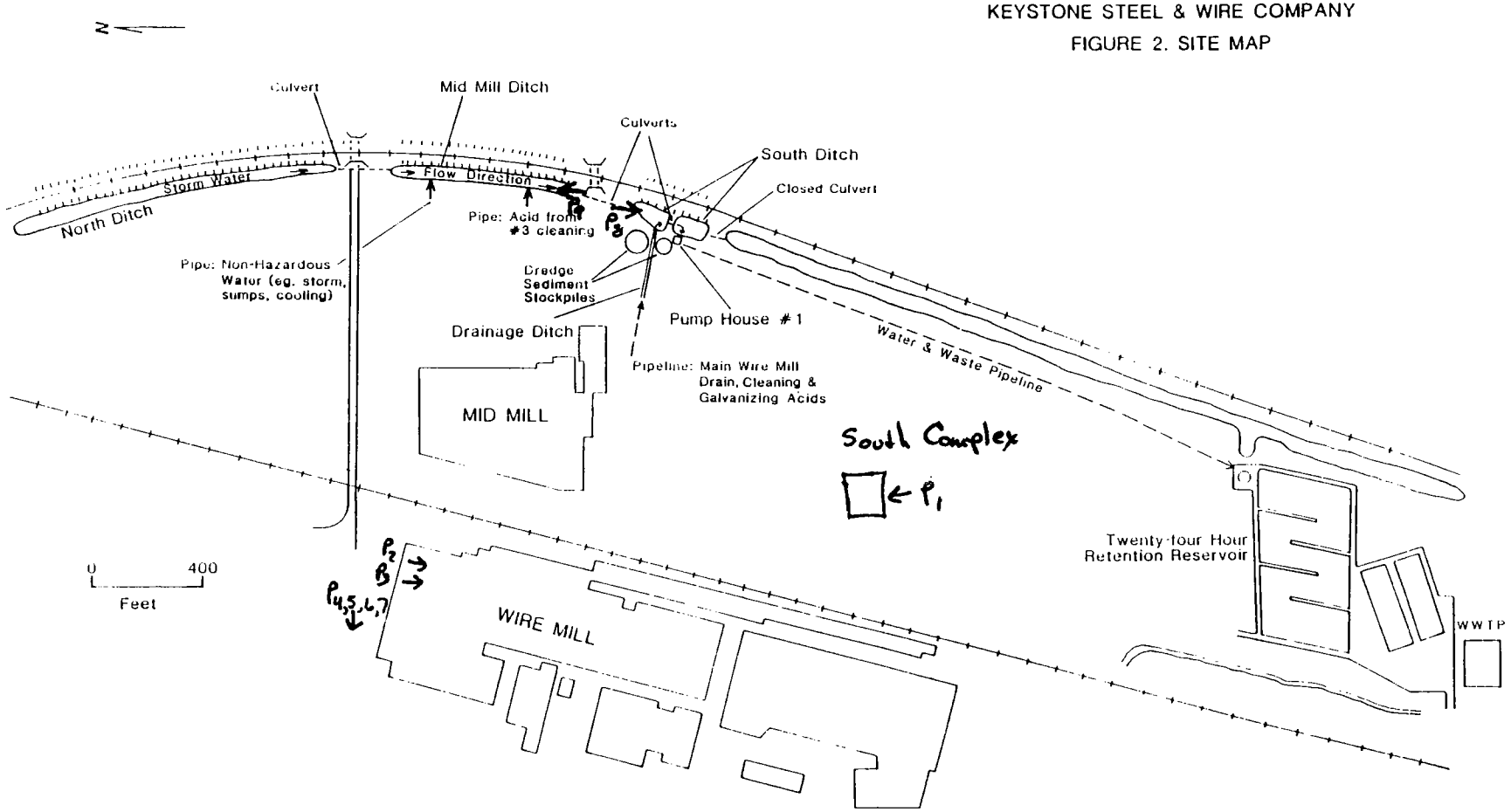
Sketch of Site: Accumulation Area(s) Treatment Area(s) Storage Area(s)

Disposal Area(s)

Arc Dust Pile off sketch

KEYSTONE STEEL & WIRE COMPANY

FIGURE 2. SITE MAP



Geosciences Research Associates, Inc.
627 North Morton Street
Bloomington, Indiana 47401

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MAR 10 1989
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Date: November 28, 1988

Time: 9:00 - 4:00

Photographed By:

John Tripses

Location:

LPC 143 005 0001

Keystone

Peoria Co.

Comments: Photograph taken

toward the north

South Complex Accumulation Area

Photograph Number: 1

Roll Number: 88 - 161

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MAR 10 1989

IEPA-DLPC

Date: November 28, 1988

Time: 9:00 - 4:00

Photographed By:

John Tripses

Location:

LPC 143 005 0001

Keystone

Peoria Co.

Comments: Photograph taken

toward the south

Wire Mill Accumulation Area

Photograph Number: 2

Roll Number: 88 - 161

Date: November 28, 1988

Time: 9:00 - 4:00

Photographed By:

John Tripses

Location:

LPC 143 005 0001

Keystone

Peoria Co.

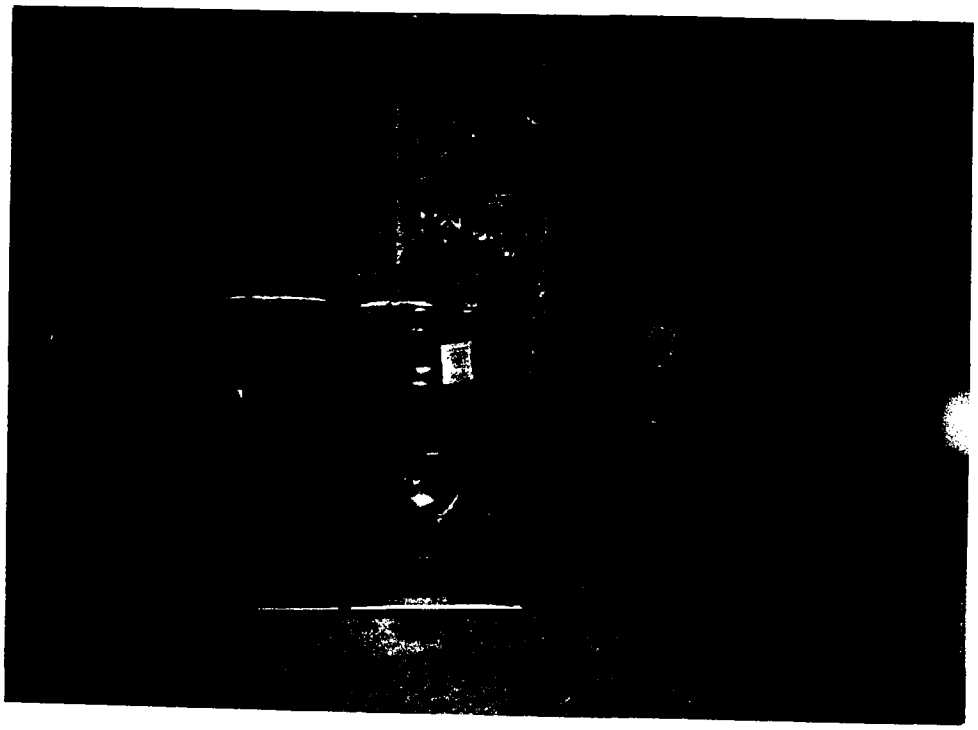
Comments: Photograph taken

toward the [redacted] South

Wire Mill Accumulation Area

Photograph Number: 3

Roll Number: 88-161



Date: November 28, 1988

Time: 9:00 - 4:00

Photographed By:

John Tripses

Location:

LPC 143 005 0001

Keystone

Peoria Co.

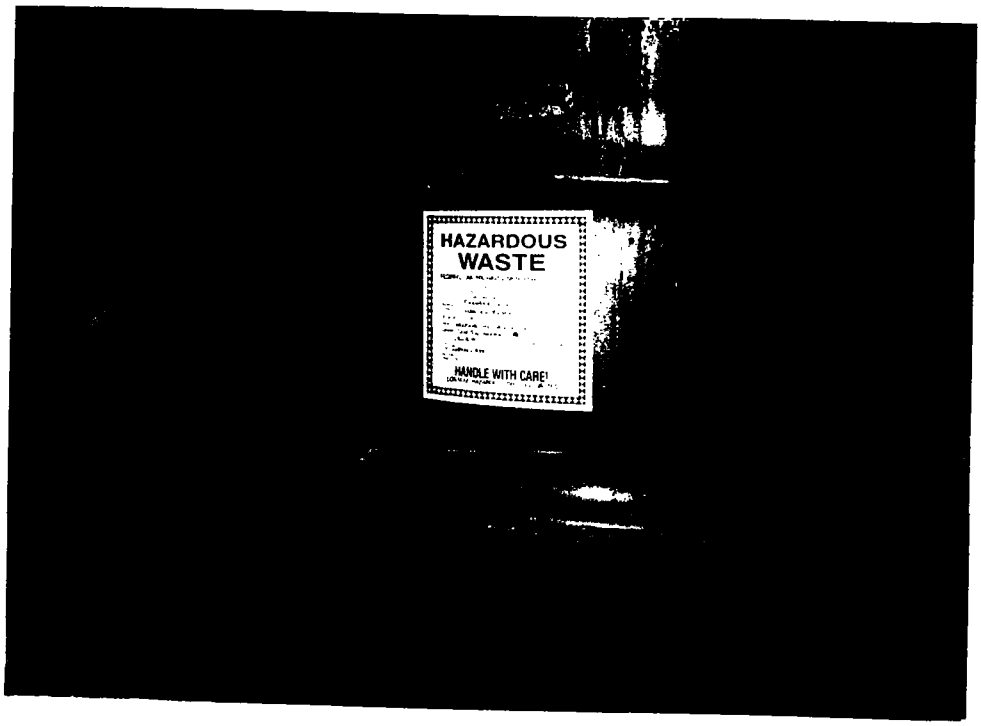
Comments: Photograph taken

toward the west

Barrels outside Wire Mill

Photograph Number: 4

Roll Number: 88-161



Date: November 28, 1988

Time: 9:00 - 4:00

Photographed By:

John Tripses

Location:

LPC 143 005 0001

Keystone

Peoria Co.

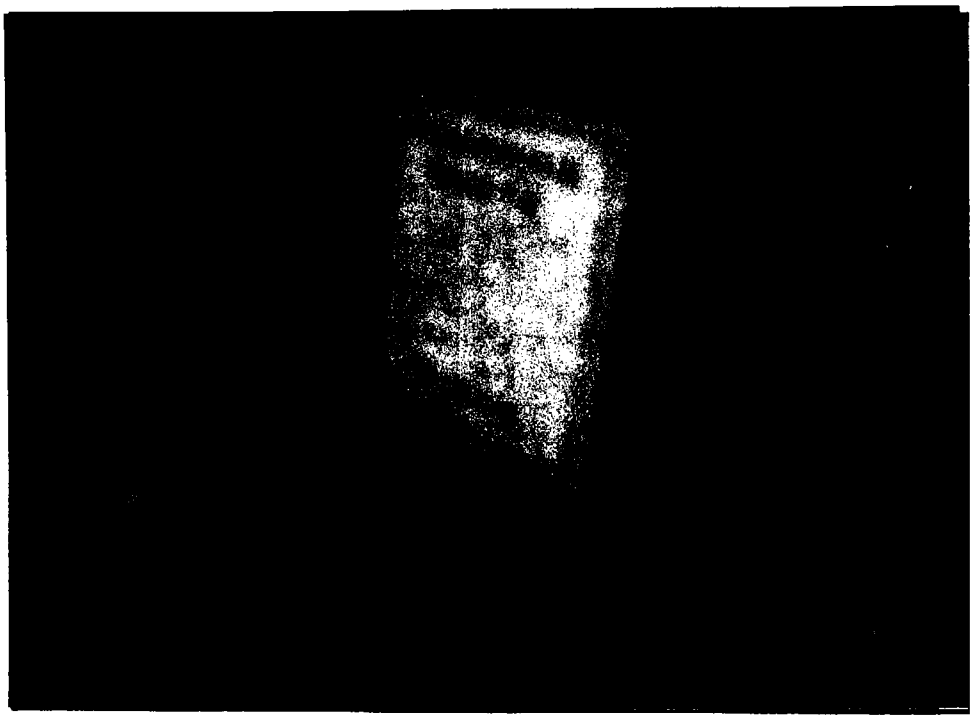
Comments: Photograph taken

toward the west

Barrels outside Wire Mill

Photograph Number: 5

Roll Number: 88 - 161



Date: November 28, 1988

Time: 9:00 - 4:00

Photographed By:

John Tripses

Location:

LPC 143 005 0001

Keystone

Peoria Co.

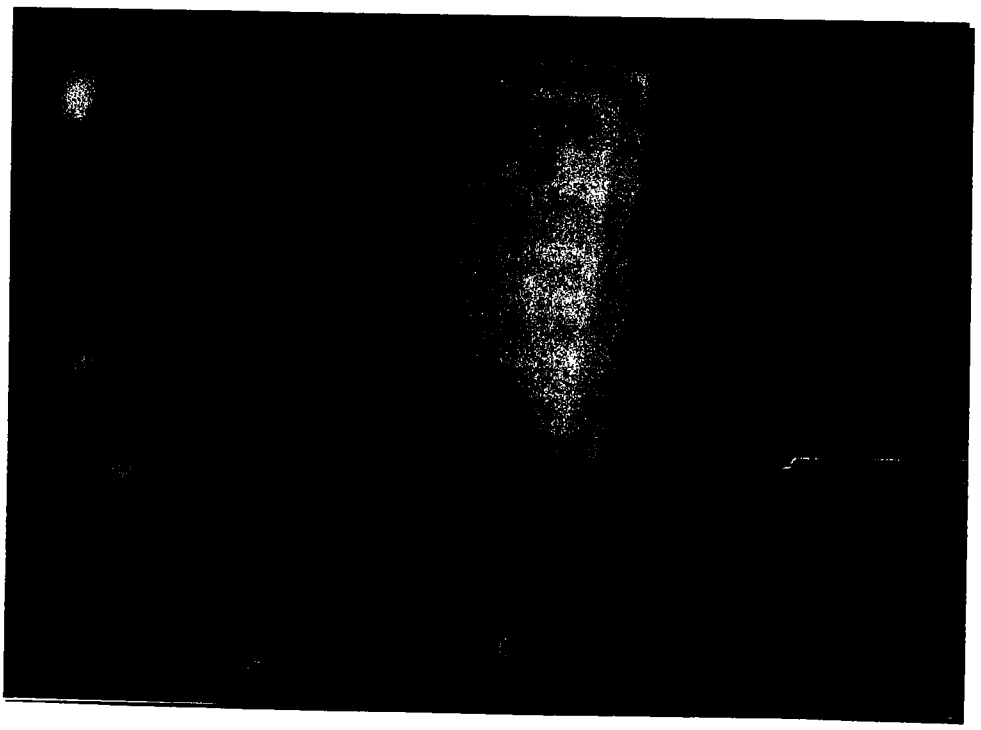
Comments: Photograph taken

toward the west

Barrels outside Wire Mill

Photograph Number: 6

Roll Number: 88 - 161



Date: November 28, 1988

Time: 9:00 - 4:00

Photographed By:

John Tripses

Location:

LPC 143 005 0001

Keystone

Peoria Co.

Comments: Photograph taken

toward the West

Barrels outside wire mill

Photograph Number: [redacted] 7

Roll Number: 88 - 161

Date: November 28, 1988

Time: 9:00 - 4:00

Photographed By:

John Tripses

Location:

LPC 143 005 0001

Keystone

Peoria Co.

Comments: Photograph taken

toward the south

South [redacted] Ditch

Photograph Number: 8

Roll Number: 88 - 161

Date: November 28, 1988

Time: 9:00 - 4:00

Photographed By:

John Tripses

Location:

LPC 143 005 0001

Keystone

Peoria Co.

Comments: Photograph taken

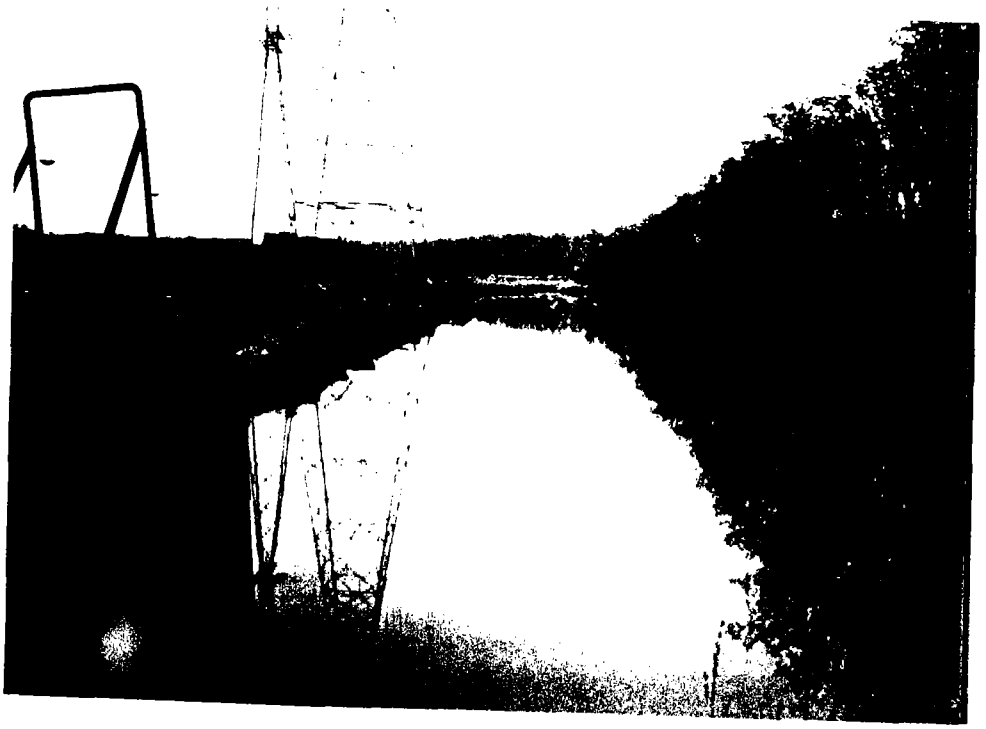
toward the [redacted] North

midMill

[redacted] Ditch

Photograph Number: 9.

Roll Number: 88 - 161



Date: November 28, 1988

Time: 9:00 - 4:00

Photographed By:

John Tripses

Location:

LPC 143 005 0001

Keystone

Peoria Co.

Comments: Photograph taken

toward the

Photograph Number:

Roll Number: 88 - 161

No Photograph

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
				PART 722 **GENERATOR STANDARDS** **Subpart A: General**				
OTH	1			**Section 722.111: Hazardous Waste Determination**	✓			
				Has the generator determined if the solid waste it generates is a hazardous waste? Yes ✓ No ___				
				Did the generator follow the procedures specified in this section in making its determination? Yes ✓ No ___				
OTH	1			**Section 722.112: USEPA Identification Number**	✓			
			a	Has the generator obtained a USEPA identification number? Yes ✓ No ___				
			c	Has the generator offered his hazardous waste only to transporters or to treatment, storage or disposal facilities that have received a USEPA identification number? Yes ✓ No ___				

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Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No
				PART 722 **GENERATOR STANDARDS** **Subpart B: The Manifest**				
MAN	2			**Section 722.120: General Requirements**	✓			
			a	Has the generator who transports, or who offers its hazardous waste for transportation off-site for treatment, storage or disposal prepared a uniform hazardous waste manifest? Yes ✓ No ____ **Note: If the generator has not used a manifest, check "No" in the Apparent Compliance Column and skip to 722.130.**				
			b	Did the generator designate on the manifest one facility which is permitted to handle the hazardous waste therein described? Yes ✓ No ____ **Note: The generator may also designate an alternate facility permitted to handle the hazardous waste in the event an emergency prevents delivery of the hazardous waste to the primary designated facility.**				
			d	In any instances where the transporter was unable to deliver the hazardous waste to the designated or alternate permitted facility, has the generator designated another permitted facility or instructed the transporter to return the waste? Yes ____ No ____				Always able to deliver waste

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No
MAN	2			**Section 722.121: Acquisition of Manifests**	✓			
			a	Did the generator use the manifest supplied by the Agency for hazardous waste going for treatment, storage or disposal in Illinois? Yes ✓ No ____ N/A ____				
			b	For hazardous waste going outside Illinois for treatment, storage or disposal, has the generator used the manifest supplied by the Agency if the State to which the hazardous waste is being shipped does not supply and require the completion of its own State manifest? **or** For hazardous waste going outside Illinois for treatment, storage or disposal, has the generator used the manifest required by the State to which the hazardous waste is being shipped? Yes ✓ No ____ N/A ____				
MAN	2			**Section 722.122: Number of Copies**	✓			
				Does the manifest the generator is using consist of at least six copies (plus one copy for each additional transporter)?				
MAN	2			**Section 722.123: Use of the Manifest**	✓			
				For each manifest received, has the generator: 1) Signed the certificate by hand? Yes ✓ No ____ 2) Obtained the handwritten signature and the date of acceptance by the initial transporter? Yes ✓ No ____				

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
				3) Retained one copy as required by Section 722.140(a), Recordkeeping? Yes ✓ No ____				
				4) Apparently sent a copy (Part 5 for Illinois manifests) to the Agency within two working days? Yes ✓ No ____				
				NOTE: Obtain a copy of any manifest which is not in compliance with the requirements of this subsection. If copies are unobtainable, log manifest #s.				
			b	Has the generator apparently given the remaining copies of the manifest to the transporter? Yes ✓ No ____				
			c	Has the generator followed the procedures prescribed in Section 722.123(c) for manifesting bulk shipments of hazardous waste by water? Yes ____ No ____ N/A ✓				
			d	Has the generator followed the procedures prescribed in Section 722.123(d) for manifesting bulk shipments of hazardous waste by rail? Yes ____ No ____ N/A ✓				

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
				PART 722 **GENERATOR STANDARDS** **Subpart C: Pre-Transport Requirements**				
OTH	1	X		**Section 722.130: Packaging**	✓			
				Is waste which is ready for transportation off-site packaged in accordance with 49 CFR, Parts 173, 178 and 179?				
OTH	1	X		**Section 722.131: Labeling**	✓			
				Is each package of hazardous waste which is ready for transportation off-site labeled in accordance with 49 CFR Part 172?				
OTH	1	X		**Section 722.132: Marking**	✓			
			a	Is each package of hazardous waste which is ready for transportation off-site marked in accordance with 49 CFR Part 172? Yes ✓ No ___				
			b	Is each package of hazardous waste which is ready for transportation off-site marked with: - The generator's name and address? Yes ✓ No ___ - The manifest document number associated with the container? Yes ✓ No ___ - The words "Hazardous Waste - Federal Law Prohibits Improper Disposal. If found contact the nearest police, or public safety authority or the U.S. Environmental Protection Agency"? Yes ✓ No ___				

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
OTH	1			**Section 722.133: Placarding**	✓			
				Does the generator have, for the waste it generates, the proper placards to: - Placard the transport vehicle, or - Offer to the first transporter, according to 49 CFR, Part 172, Subpart F? **NOTE: If the placards are provided by the transporter, then mark the N/A Column and use Comment field to explain.**				
OTH	1	X		**Section 722.134: Accumulation Time**		✓		
				NOTE: If the TSD checklist will be completed and the facility only accumulates wastes for 90 days or less for Section 722.134 complete page GEN-C-2(a) then skip to TSD checklist.				
				NOTE: A generator who is also a TSD would be subject to this section for any waste which is not identified for storage on the facility's Part A, or which is being accumulated outside a "permitted" storage area.				
			a	**For waste in containers, has** the generator complied with the requirements of 35 Ill. Adm. Code 725, Subpart I: Use and Management of Containers listed below:				
				NOTE: If no wastes in containers, mark "N/A" and skip to Section 725.291 of the Generator checklist.				

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
OTH	1	X		**Section 722.134: Accumulation Time**				
				NOTE: A generator who is also a TSD would be subject to this section for any waste which is not identified for storage on the facility's Part A, or which is being accumulated outside a "permitted" storage area.				
			a1	For waste in containers, has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subpart I? **and/or** For waste in tanks, has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subpart J except Section 725.297(c) and 725.300? Yes ✓ No ___				
			a2	For waste in containers, has the generator marked and made visible for inspection on each container, the date upon which accumulation began? Yes ___ No ✓ N/A ___				
			a3	For waste in containers and tanks, has the generator marked or labeled each with the words "Hazardous Waste"? Yes ___ No ✓				
			a4	Has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subparts C and D, and Section 725.116? Yes ___ No ✓				See TSD checklist for specifics

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Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
				SATELLITE ACCUMULATION				
			c1	Is the generator who accumulates hazardous waste in containers at or near any point of generation where wastes initially accumulate and which is under the control of the operator of the process generating the waste: - Limiting such accumulation to 55 gallons (one quart of acutely hazardous waste listed in 35 Ill. Adm. Code 721.133)? Yes ✓ No ____ N/A ____ - Complying with the requirements of: 1) 35 Ill. Adm. Code 725.271, Condition of Containers? Yes ✓ No ____ 2) 35 Ill. Adm. Code 725.272, Compatibility of Waste with Containers? Yes ✓ No ____ 3) 35 Ill. Adm. Code 725.273(a), Management of Containers - requiring that the containers be stored closed except when waste is being added or removed? Yes ✓ No ____ - Marking the containers with the words "Hazardous Waste" or with words that identify the contents of the containers? Yes ✓ No ____				

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Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
			c2	Has the generator who accumulates more than 55 gallons (one quart of acutely hazardous waste listed in 35 Ill. Adm. Code 721.133(e)) with respect to the amount of excess waste, complied with the requirements in Section 722.134(a) within three days? Yes ____ No ____ Are the containers with the excess amounts marked with the date accumulation began? Yes ____ No ____ During the three day period, is the generator continuing to comply with the requirements of Section 722.134(c)(1)? Yes ____ No ____				No excess accumulation

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
				PART 722 **GENERATOR STANDARDS** **Subpart D: Recordkeeping and Reporting**				
OTH	2			**Section 722.140: Recordkeeping**	✓			
				Has the generator retained for a period of three years:				
			a	- A copy of each signed manifest? Yes ✓ No ___				
			b	- A copy of each annual report? Yes ✓ No ___				
			b	- A copy of each exception report? Yes ___ No ___ N/A ✓				
			c	- Copies of test results, waste analyses or other determinations made in accordance with Section 722.111? Yes ✓ No ___ N/A ___				
			d	Does a generator who is involved in any unresolved enforcement action continue to maintain the records required in 722.140(a) thru (c)? Yes ___ No ___ N/A ✓				
			d	If the Director has requested that the records required in 722.140(a) thru (c) be maintained for a period longer than three years, has the generator continued to maintain them? Yes ___ No ___ N/A ✓				

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
OTH	2			**Section 722.141: Annual Reporting**	✓			
				Has the generator who ships waste off-site to a treatment, storage or disposal facility within the United States prepared and submittted a copy of an annual report, as supplied by the Agency, to the Agency by March 1 for the preceeding calendar year?				
				NOTE: A generator who treats, stores or disposes of hazardous waste on-site must also submit an annual report as a TSD in accordance with the requirements of 35 Ill. Adm. Code 702, 703, 724, 725 and 40 CFR 266.				
MAN	1			**Section 722.142: Exception Reporting**			✓	No exception reports required
			a	Has the generator who has not received a signed copy of the manifest from the designated TSD within 35 days of the date the waste was accepted by the initial transporter determined the status of its hazardous waste? Yes ____ No ____				
			b	Has the generator who has not received a signed copy of the manifest from the designated TSD within 45 days of the date the waste was accepted by the original transporter submitted an exception report to the Director? Yes ____ No ____				
			b	Does any exception report submitted to the Director contain the following:				
				- A legible copy of the manifest for which the generator does not have confirmation of delivery; and				

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Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
				- A cover letter signed by the generator or his authorized representative explaining the efforts taken to locate the hazardous waste and the results of those efforts? Yes ____ No ____ N/A ____				
OTH	1			**Section 722.143: Additional Reporting** Has the generator submitted all additional reports concerning quantities and disposition of wastes as required by the Director?			✓	

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Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
OTH	1/2			**PART 722** **GENERATOR STANDARDS** **Subpart E: Exports of Hazardous Waste**			✓	
				Section 722.152: General Requirements Has the facility made any shipments of hazardous waste outside the United States? Yes ____ No ✓ **NOTE: If "No", skip Subpart E. If "Yes", answer the next question.** Has the generator complied with the requirements in Sections 722.152 through 722.157? Yes ____ No ____ **NOTE: If the answer is "No", explain in detail why the firm did not meet the requirements. Review the requirements prior to answering this question. When citing a violation of this Subpart, identify the specific section violated in the Narrative as well as in the Comments.**				

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Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
				PART 722 **GENERATOR STANDARDS** **Subpart F: Imports of Hazardous Waste**				
MAN	1			**Section 722.160: Imports of Hazardous Waste**			✓	
			b1	Has the person importing hazardous waste met the manifest requirements of Section 722.120 except that: In place of the generator's name, address and USEPA identification number, the name and address of the foreign generator and the importer's name, address and USEPA identification number are used; **and**				
			b2	Has the importer or his agent signed the manifest in place of the generator; **and**				
			b2	Has the importer or his agent obtained the signature of the initial transporter? Yes ____ No ____ N/A ____				
			c	Is the person importing hazardous waste using manifests obtained from the Agency? Yes ____ No ____				

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
				PART 722 **GENERATOR STANDARDS** **Subpart G: Farmers**				
OTH	2	X		**Section 722.170: Farmers**			✓	
				Is a farmer who is disposing of waste pesticides from his own use which are hazardous wastes: - Triple rinsing each emptied pesticide container in accordance with 35 Ill. Adm. Code 727.107(b)(3), Residues of Hazardous Waste in Empty Containers? Yes ___ No ___ N/A ___ - Disposing of pesticide residue on his own farm in a manner consistent with the disposal instructions on the pesticide label? Yes ___ No ___ N/A ___ **NOTE: If the answer to either of the preceeding questions is "No", the farmer is subject to the requirements of this Part (722) and to the applicable portions of 35 Ill. Adm. Code 702, 703 and 725 (724). Complete the applicable inspection form(s).**				

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	In Apparent Compliance? No	Not Applicable	Remarks or Comment No.
				PART 703 **RCRA PERMIT PROGRAM** **Subpart B: Prohibitions**				
OTH	1			**Section 703.121: RCRA Permits**		✓		
			a	Is any person(s) conducting any hazardous waste storage, hazardous waste treatment or hazardous waste disposal operation doing so only:				
				1) With a RCRA permit for the HWM facility? Yes ____ No ✓				
				2) In conformance with all conditions imposed by the RCRA permit? Yes ____ No ____ N/A ✓				No permit
			b	Do the owner and operator of hazardous waste management units have permits during the active life of the unit (including the closure period)? Yes ____ No ✓				
			b	Do the owners and operators of any hazardous waste unit which closed after January 26, 1982 have a permit during any post-closure period required under 35 Ill. Adm. Code 724.217 Post Closure Care and Use of Property and during any compliance period or any extension of that compliance period specified under 35 Ill. Adm. Code 724.196, Compliance Period? Yes ____ No ____ N/A ✓				

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Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
				PART 703 **RCRA PERMIT PROGRAM** **Subpart C: Authorization by Rule and Interim Status**				
OTH	1			**Section 703.150: Application by Existing HWM Facilities and Interim Status Qualifications**		✓		
			a	Has the owner or operator of an existing HWM facility or of a HWM facility in existence on the effective date of statutory or regulatory amendments that render the facility subject to the requirement to have a RCRA permit submitted Part A of the permit application to the Agency no later than the following times, whichever comes first: 1) Six months after the date of publication of regulations which first require the owner or operator to comply with standards in 35 Ill. Adm. Code 725? Yes ___ No ✓ N/A ___ 2) Thirty days after the date the owner or operator first becomes subject to the standards in 35 Ill. Adm. Code 725? Yes ___ No ✓ N/A ___ 3) By March 27, 1987 for generators who generate more than 100, but less than 1000 kg of waste in a calendar month and treat, store, or dispose of these wastes on-site? Yes ___ No ___ N/A ✓				

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
OTH	1			**Section 703.151: Application by New HWM Facilities**			✓	
				For a new HWM facility, has the facility complied with the requirements of this section? Specifically, has the facility submitted Part A and Part B of the permit application 180 days before physical construction has commenced? Yes ____ No ____ Is the facility only operating with a RCRA permit? Yes ____ No ____ **NOTE: This violation should be cited in the CIL only after receiving approval from headquarters.**				
OTH	1			**Section 703.152: Amended Part A Application**			✓	
				Has the owner or operator of a HWM facility with interim status filed an amended Part A permit application with the Agency: 1) No later than the effective date of revised regulations under 35 Ill. Adm. Code 721, Identification and Listing of Hazardous Waste, listing or identifying additional hazardous waste which the HWM facility is handling? Yes ____ No ____ N/A ____ 2) As necessary to comply with the provisions of Section 703.155, Changes During Interim Status? Yes ____ No ____ N/A ____ **NOTE: The owner or operator of a facility who fails to comply with the updating requirements of this section does not receive interim status as to the wastes not covered by duly filed Part A applications.**				

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
OTH	1			**Section 703.154: Prohibitions During Interim Status**			✓	The facility did not have interim status
				During interim status, has the facility refrained from:				
			a	- Treating, storing or disposing of hazardous waste not specified in Part A of the permit application? Yes ____ No ____				
			b	- Employing processes not specified in Part A of the permit application? Yes ____ No ____				
			c	- Exceeding the design capacities specified in Part A of the permit application? Yes ____ No ____				
OTH	1			**Section 703.155: Changes During Interim Status**			✓	
				NOTE: Section 703.155(a), (b) and (c) reiterate in more detail the requirement that a HWM facility submit and, in the case of (b) and (c) that the Agency approve, amendments to the Part A permit application prior to the facility conducting the activity or receiving new hazardous waste. A "No" answer to any of the questions under Section 703.154 means the facility is also in apparent non-compliance with this section.				
			d	Did the owner or operator submit a revised Part A permit application not later than 90 days prior to changes in operational control or ownership of the HWM facility? Yes ____ No ____ N/A ____				

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
				PART 725 **INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES** **Subpart A: General Provisions**				
OTH	1			**Section 725.101: Purpose, Scope and Applicability**	✓			
				Does the facility qualify for any of the exemptions under Section 725.101(c)? Yes ____ No ✓				
				<u>NOTE</u>: If "Yes", explain in narrative.				
			d	Has the firm managed hazardous waste with the following hazardous waste numbers: F020, F021, F022, F023, F026 or F027 in compliance with the requirements of 725.101(d)? Yes ____ No ✓				

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
				PART 725 **INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES** **Subpart B: General Facility Standards**				
OTH	1			**Section 725.111: USEPA Identification Number**	✓			
				Has the facility obtained a USEPA identification number?				
OTH	1			**Section 725.112: Required Notices**			✓	
			a	Has the owner or operator of a facility that has arranged to receive hazardous waste from a foreign source notified the Regional Administrator, in writing, at least four weeks in advance of the date that the waste is expected to arrive at the facility? Yes ____ No ____ N/A ✓				
			b	Before transferring ownership or operation of a facility during its operating life, or of a disposal facility during the post-closure care period, did the owner or operator notify the new owner or operator, in writing, of the requirements of 35 Ill. Adm. Code 703, 703 and 725? Yes ____ No ____ N/A ✓				
OTH	1			**Section 725.113: General Waste Analysis**	✓			
			a1	Has the owner or operator of the facility obtained a detailed chemical analysis of each waste prior to its treatment, storage or disposal? Yes ✓ No ____				

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
			a1	Does the analysis contain all the information which must be known to treat, store or dispose of the waste in accordance with this Part? Yes ✓ No ____				
			a3	Has the analysis been repeated: A) When the operator is notified or has reason to believe that the process generating the hazardous waste has changed? Yes ✓ No ____ N/A ____ B) By off-site facilities, when the results of the inspection required in Section 725.113(a)(4) indicate that the hazardous waste received at the facility does not match the waste designated on the accompanying manifest or shipping paper? Yes ____ No ____ N/A ✓				
			a4	Has the owner or operator of an off-site facility apparently inspected each hazardous waste movement received at the facility to determine whether it matches the identity of the waste specified on the accompanying manifest or shipping paper? Yes ____ No ____ N/A ✓				
			b	Has the owner or operator developed a written analysis plan? Yes ____ No ✓ **NOTE: If "No", skip to 725.114.** Is the written waste analysis plan available at the facility? Yes ____ No ____				

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
				Does the owner or operator follow the procedures in the written plan so as to comply with the requirements in Section 725.113(a)? Yes ____ No ____				
			b	Does the plan specify: 1) The parameters for which each hazardous waste will be analyzed and the rationale for the selection of these parameters? Yes ____ No ____ 2) The test methods which will be used to test for those parameters? Yes ____ No ____ 3) The sampling method which will be used to obtain a representative sample of the waste to be analyzed? Yes ____ No ____ 4) The frequency with which the initial analysis of the waste will be reviewed or repeated to ensure that the analysis is accurate and up-to-date? Yes ____ No ____ 5) For off-site facilities, the waste analyses that hazardous waste generators have agreed to supply? Yes ____ No ____				

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
				6) The methods which will be used to meet the additional analysis requirements for specific waste management methods as specified in Sections: - 725.293 (Tanks); - 725.325 (Surface Impoundments); - 725.352 (Waste Piles); - 725.373 (Land Treatment); - 725.414 (Incinerators); - 725.475 (Thermal Treatment); - 725.502 (Chem. Phys. Bio. Treat.) Yes ____ No ____ N/A ____ **NOTE: Circle the specific waste management methods being employed.**				
			c	For off-site facilities, does the plan: 1) Describe the procedures which will be used to determine the identity of each movement of waste managed at the facility? Yes ____ No ____ N/A ____ 2) Describe the sampling methods which will be used to obtain a representative sample of the waste to be identified, if the identification method includes sampling? Yes ____ No ____ N/A ____				
OTH	1	X		**Section 725.114: Security** Does the facility qualify for the exemption to the requirement to provide security provided in Section 725.114(a)? Yes ____ No ✓	✓			

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
				Does a non-exempt facility have either:				
			b	1) A 24-hour surveillance system which continuously monitors and controls entry into the active portion of the facility? Yes ✓ No ___				
				OR				
			b	2) An artificial or natural barrier which completely surrounds the active portion of the facility and a means to control entry at all times thru the gate(s) or other entries to the active portion of the facility? Yes ✓ No ___				
			c	Does a non-exempt facility have a sign, legible from a distance of at least 25 feet, with the words "Danger - Unauthorized Personnel Keep Out" at each entrance to the active portion of the facility and at other locations in sufficient numbers to be seen from any approach to the active portion? Yes ✓ No ___ **NOTE: Existing signs with legends other than the one above may be used if the legend on the sign indicates only authorized personnel are allowed to enter the active portion and that entry onto the active portion can be dangerous.**				

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
OTH	2			**Section 725.115: General Inspection Requirements**		✓		
			a	Does the owner or operator inspect the facility for malfunctions, deterioration, operator errors and discharges which are causing or may lead to: 1) Release of hazardous waste or hazardous waste constituents to the environment; or a threat to human health? Yes ✓ No ___				
			a	Does the owner or operator conduct these inspections often enough to identify problems in time to correct them before they harm human health or the environment? Yes ✓ No ___				
			b1	Has the owner or operator developed a written schedule for inspecting all monitoring equipment, safety and emergency equipment, security devices and operating and structural equipment important to preventing, detecting or responding to environmental or human health hazards? Yes ___ No ✓				
			b2	Is the written schedule at the facility? Yes ___ No ✓				
			b3	Does the schedule identify the types of problems which are to be looked for during the inspection? Yes ___ No ✓				
			b4	Does the schedule specify at least the following minimum inspection frequency: - Daily inspections of areas subject to spills? Yes ___ No ✓				

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
				- The items and frequencies, where applicable, called for in Sections: - 725.274 (Containers); - 725.294 (Tanks); - 725.326 (Surface Impoundments); - 725.447 (Incinerators); - 725.477 (Thermal Treatment); - 725.503 (Chem. Phys. Bio. Treat.) Yes ____ No ✓ N/A ____ **NOTE: Circle the applicable section.**				
			c	Has the owner or operator remedied any deterioration or malfunction of equipment or structures which the inspections reveal on a schedule which ensures that the problem does not lead to an environmental or human health hazard? Yes ____ No [redacted]				
			c	Where a hazard is imminent or has already occurred, has the owner or operator taken immediate action to resolve the problem? Yes ____ No [redacted] N/A ____				
			d	Does the owner or operator record the results of inspections in a log or summary? Yes ____ No ✓				No inspection records.
			d	Does the inspection record include: - The date and time of the inspection? Yes ____ No ✓ - The name of the inspector? Yes ____ No ✓				

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
				- A notation of the observations made? Yes ____ No ✓				
				- The date and nature of any type of corrective action? Yes ____ No ✓ N/A ____				
OTH	2			**Section 725.116: Personnel Training**		✓		
				Does the facility have a training program? Yes ____ No ✓				
				NOTE: If "No", skip to Section 725.117, Page TSD-B-10.				
			a1	Have facility personnel who are involved with hazardous waste management successfully completed a program of classroom or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the requirements of this Part? Yes ____ No ____				
				Is the training program formalized, i.e., written down? Yes ____ No ____				
			a2	Is the program directed by a person who has been trained in hazardous waste management procedures? Yes ____ No ____				
			a3	Does the program cover, at a minimum:				
				A) Procedures for using, inspecting, repairing and replacing facility emergency and monitoring equipment? Yes ____ No ____ N/A ____				

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No
				B) Key parameters for automatic waste feed cutoff systems? Yes ____ No ____ N/A ____				
				C) Communications or alarm systems? Yes ____ No ____ N/A ____				
				D) Response to fire or explosion? Yes ____ No ____ N/A ____				
				E) Response to ground water contamination incidents? Yes ____ No ____ N/A ____				
				Does the program cover the implementation of the contingency plan? Yes ____ No ____				
			b	Have new employees completed the program within six months of the date of employment or assignment to a position requiring them to manage hazardous waste? Yes ____ No ✓ N/A ____				
			c	Has the facility conducted an annual review of the initial training? Yes ____ No ✓ N/A ____				
			d	Are the following documents and records being maintained at the facility:				
				1) The job title for each position related to the management of hazardous waste and the name(s) of the employee(s) filling each job? Yes ____ No ✓				

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
				2) A written job description for each job position above, to include the requisite skill, education or other qualifications and duties of personnel assigned to each position? Yes ____ No ✓				
				3) A written description of the type and amount of both initial and continuing training that will be given to each person holding a position dealing with hazardous waste management? Yes ____ No ✓				
				4) Records to document that the training or job experience have been given to and completed by personnel dealing with hazardous waste management? Yes ____ No ✓				
			e	Is the facility maintaining training records of former employees who were involved in hazardous waste management for a period of at least three years? Yes ____ No ____ N/A ____				
OTH	1	X		**Section 725.117: General Requirements for Ignitable, Reactive or Incompatible Wastes**	✓			
			a	Are ignitable and reactive wastes protected from and separated from sources of ignition and reaction? Yes ✓ No ____				
			a	Are smoking and open flames restricted to specially designated areas when ignitable or reactive waste is being handled? Yes ✓ No ____				

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
			a	Are "No Smoking" signs posted whenever there is a hazard from ignitable or reactive waste? Yes ✓ No ____				
			b	Is the treatment, storage or disposal of ignitable or reactive waste and the mixture or comingling of incompatible wastes and materials being done so that it does *not:* 1) Generate extreme heat or pressure, fire, or explosion or violent reaction? Yes ✓ No ____ 2) Produce uncontrolled toxic mists, fumes, dusts or gases in sufficient quantities to threaten human health? Yes ✓ No ____ 3) Produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosion? Yes ✓ No ____ 4) Damage the structural integrity of the device or facility containing the waste? Yes ✓ No ____ 5) Through other like means threaten human health or the environment? Yes ✓ No ____				

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
				Section 725.118: Location Standards Has the facility placed hazardous waste in a salt dome, salt bed formation, underground mine or cave after July 11, 1986? Yes ____ No ____ N/A ✓ **NOTE: A "Yes" answer is a violation of the location standard.**			✓	

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
				PART 725 **INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES** **Subpart C: Preparedness and Prevention**				
OTH	1	X		**Section 725.131: Maintenance and Operation of Facility**	✓			
				Is the facility being maintained and operated to minimize the possibility of a fire, explosion or any unplanned and sudden or non-sudden release of hazardous waste or hazardous waste constituents to: - Air; - Soil; or - Surface water, which would threaten human health or the environment? Yes ✓ No ___				
OTH	1	X		**Section 725.132: Required Equipment**	✓			
				Is the facility equipped with the following, unless none of the hazards posed by waste handled at the facility could require a particular kind of equipment:				
			a	- An internal communications or alarm system capable of providing immediate emergency instructions? Yes ✓ No ___ N/A ___				
			b	- A device such as a telephone (immediately available at the scene of operations) capable of summoning emergency assistance from local police or fire departments or State or local emergency response teams? Yes ✓ No ___ N/A ___				

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
			c	- Portable fire extinguishers, fire control equipment, spill control equipment and decontamination equipment? Yes ✓ No ____ N/A ____				
			d	- Water at adequate volume and pressure to supply water hose streams or foam producing equipment or automatic sprinklers or water spray systems? Yes ✓ No ____ N/A ____ **NOTE: Any "N/A" answers must be explained in the Remarks column.**				
OTH	1	X		**Section 725.133: Testing and Maintenance of Equipment**	✓			
				Where required, is the facility testing and maintaining, as necessary, to assure proper operation in time of emergency: - Communications/alarm systems? Yes ✓ No ____ N/A ____ - Fire protection equipment? Yes ✓ No ____ N/A ____ - Spill control equipment? Yes ✓ No ____ N/A ____ - Decontamination equipment? Yes ✓ No ____ N/A ____ **NOTE: Any "N/A" answer must be explained in the Comments.**				

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
OTH	1	X		**Section 725.134: Access to Communications or Alarm Systems**	✓			
			a	Do all personnel involved in handling hazardous waste have immediate access to an internal alarm or emergency communication device, either directly or thru visual or voice contact with another employee, unless not required under Section 725.132? Yes ✓ No ____ N/A ____				
			b	*If there is ever just one employee on the premises while* the facility is operating, does he have immediate access to a device, such as a telephone, capable of summoning external emergency assistance, unless such a device is not required under Section 725.132? Yes ✓ No ____ N/A ____				
OTH	1	X		**Section 725.135: Required Aisle Space**	✓			
				Is the owner or operator maintaining sufficient aisle space to allow the unobstructed movement of personnel, fire equipment and decontamination equipment to any area of the facility?				
OTH	2			**Section 725.137: Arrangements with Local Authorities**	✓			
			a	Has the owner or operator made or attempted to make the following arrangements as appropriate for the type of waste handled at his facility and the potential need for the services of these organizations:				

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
				1) Arrangements to familiarize police and fire departments and emergency response teams with the layout of the facility, properties of hazardous wastes handled at the facility and associated hazards, places where personnel would normally be working, entrances to roads inside the facility and possible evacuation routes? Yes ✓ No ____ N/A ____				
				2) Where more than one police or fire department might respond to an emergency, has one been designated as the primary emergency authority with the others agreeing to provide support to the primary emergency authority? Yes ✓ No ____ N/A ____				
				3) Agreements with State emergency response teams, emergency response contractors and equipment suppliers? Yes ✓ No ____ N/A ____				
				4) Arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illnesses which could result from fires, explosions or releases at the facility? Yes ✓ No ____ N/A ____				
				NOTE: Any "N/A" answer must be explained in the Comments.				
			b	Has the owner or operator documented, in the operating record, refusal of State or local authorities to enter into any or all of the above arrangements? Yes ____ No ____ N/A ✓				

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
				PART 725 **INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES** **Subpart D: Contingency Plan and Emergency Procedures**				
OTH	1			**Section 725.151: Purpose and Implementation of Contingency Plan**				
			a	Is a plan available? Yes ✓ No ___				
				NOTE: If the answer is "No", skip to 725.155.				
			a	Is the plan designed to minimize hazards to human health or the environment from fires, explosions or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface waters? Yes ✓ No ___				
			b	Have the provisions of the plan been carried out immediately whenever there was a fire, explosion or release of hazardous waste constituents which could threaten human health or the environment? Yes ___ No ___ N/A ✓				
OTH	2			**Section 725.152: Content of Contingency Plan**				
			a	Does the plan describe the actions facility personnel must take to comply with Sections 725.151 and 725.156 in response to: 1) Fires? Yes ✓ No ___ 2) Explosions? Yes ✓ No ___				

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
				3) Unplanned sudden or non-sudden releases of hazardous waste or hazardous waste constituents to air, soil, or surface water? Yes ___ No ✓				The contingency plan does not describe actions required for release of spent pickle liquor, paint waste, and spent perchloroethylene.
			c	Does the plan describe the arrangements agreed to by:				
				1) Local police and fire departments? Yes ___ No ✓				
				2) Hospitals? Yes ___ No ✓				
				3) Contractors? Yes ___ No ✓				
				4) State and local emergency response teams? Yes ___ No ✓				
			d	Does the plan list the names, addresses and phone numbers (office and home) of all personnel qualified to act as emergency coordinators? Yes ✓ No ___				
			d	Is the list of emergency coordinators up-to-date? Yes ✓ No ___				
			d	If more than one person is designated as an emergency coordinator is a primary coordinator designated? Yes ✓ No ___				
			e	Does the plan identify:				
				1) A list and physical description of all emergency equipment at the facility? Yes ___ No ✓				

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	In Apparent Compliance? No	Not Applicable	Remarks or Comment No.
				2) A brief outline of the capability of each piece of emergency equipment? Yes ____ No ✓				
				3) The location of each piece of emergency equipment? Yes ____ No ✓				
			e	Is the list of emergency equipment up-to-date? Yes ____ No ✓				
			f	Does the plan include an evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? Yes ____ No ____ N/A ✓				
			f	Does the plan identify the signal to be used to begin evacuation? Yes ____ No ____				
			f	Are alternate evacuation routes identified? Yes ____ No ____				
OTH	2			**Section 725.153: Copies of Contingency Plan**		✓		
			a	Has a copy (and all revisions) of the contingency plan:				
				a) Been maintained at the facility? Yes ✓ No ____				
			b	b) Been submitted to all local police and fire departments, hospitals, and State and local emergency response teams that may be called upon to provide emergency service? Yes ____ No ✓				

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
OTH	2			**725.154: Amendment of Contingency Plan**			✓	
				Has the contingency plan been reviewed and, if necessary, amended whenever:				
			a	1) Applicable regulations are revised? Yes ____ No ____				
			b	2) The plan fails in an emergency? Yes ____ No ____ N/A ____				
			c	3) The facility changes - in its design, construction, operation, maintenance or other circumstances - in a way that materially increases the potential for fires, explosions, or releases of hazardous waste or hazardous waste constituents or changes the response necessary in an emergency? Yes ____ No ____ N/A ____				
			d	4) The list of emergency coordinators changes? Yes ____ No ____				
			e	5) The list of emergency equipment changes? Yes ____ No ____				
OTH	2			**Section 725.155: Emergency Coordinator**		✓		
				Is there an emergency coordinator on-site or on-call at all times? Yes ✓ No ____				

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
				Is there an emergency coordinator familiar with all aspects of the contingency plan, all operations and activities at the facility, the location and characteristics of the wastes handled, the location of all records in the facility and the facility layout? Yes [redacted] No ✓ Does the coordinator have the authority to commit the resources to carry out the contingency plan? Yes ✓ No ____				Emergency Coordinators have not been trained.
OTH	1/2			**Section 725.156: Emergency Procedures** Has the facility had a release, fire or explosion? Yes ____ No ____ **NOTE: If the answer is "Yes", explain in detail the incident and how the facility did or did not follow the procedures described in this section. Review the requirements while completing the explanation. If the company failed to meet one or more of the requirements, check "No" in the Apparent Compliance column.**			✓	

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
				PART 725 **INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES** **Subpart E: Manifest System, Recordkeeping and Reporting**				
MAN	1			**Section 725.171: Use of Manifest System**			✓	
				Does the facility accept waste from off-site? Yes ____ No ✓				
				NOTE: If the answer is "Yes", complete this section. If the answer is "No", check "N/A" and skip to 725.173.				
				For each manifest reviewed, did the facility:				
			a1	1) Sign and date each copy to certify that the hazardous waste covered by the manifest was received? Yes ____ No ____				
			a2	2) Note any significant discrepancies in the manifest or each copy of the manifest? Yes ____ No ____ N/A ____				
			a3	3) Immediately give one copy of the completed manifest to the transporter? Yes ____ No ____				
			a4	4) Within 30 days after delivery, send one copy of the manifest to the generator and one copy to the Agency? Yes ____ No ____				
			a5	5) Retain a copy of the manifest at the facility for a period of three years from the date of delivery of the waste? Yes ____ No ____				

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
			b	Has the facility followed the procedures prescribed in 725.171(b) for rail or water (bulk shipments) of hazardous waste? Yes ____ No ____ N/A ____ Does the facility initiate shipments of hazardous waste? Yes ____ No ____ **NOTE: If the answer is "Yes", the facility is also a generator of hazardous waste. Complete the generator checklist.**				
MAN	2			**Section 725.172: Manifest Discrepancies**			✓	
				NOTE: If there are no manifest discrepancies, mark the "N/A" column.				
			b	Has the owner or operator attempted to resolve significant discrepancies in quantity or type (i.e., variations in weight of 10% or more, variations in piece count of one container per truckload, obvious differences which can be discovered by inspection or waste analysis such as waste solvent substituted for waste acid) upon their discovery? Yes ____ No ____				
			d	If the discrepancy is not resolved within 15 days after receiving the waste, has the owner or operator submitted to the Agency a letter describing the discrepancy and the attempts made to reconcile it and a copy of the manifest or shipping paper at issue? Yes ____ No ____				

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
OTH	2			**Section 725.173: Operating Record**		✓		
			a	Does the owner or operator have a written operating record at the facility? Yes ✓ No ___				
			b	Is the information in the operating record being maintained until closure of the facility? Yes ✓ No ___				
			b	Does the operating record contain the following information: 1) A description of and quantity of each hazardous waste received at the TSD facility (whether from on or off-site generation)? Yes ___ No ✓ 2) A record of the method(s) and date(s) of its treatment, storage, or disposal as required by Appendix I? Yes ___ No ✓ 3) The location of each hazardous waste within the facility? Yes ___ No ✓ 4) The quantity of each hazardous waste at each location within the facility? Yes ___ No ✓ 5) For disposal facilities, a map recording the location and quantity of hazardous waste in each cell or disposal area? Yes ___ No ___ N/A ✓				

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No
				6) A cross reference by manifest number to location and quantity of hazardous waste? Yes ____ No ✓ N/A ____				
				7) Records and results of waste analyses and trial test performed as specified in Sections: - 725.113 (Gen. Waste Analysis)? Yes ✓ No ____ - 725.293 (Tanks)? Yes ____ No ____ N/A ✓ - 725.325 (Surface Improvements)? Yes ✓ No ____ N/A ____ - 725.352 (Waste Piles)? Yes ____ No ✓ N/A ____ - 725.373 (Land Treatment)? Yes ____ No ____ N/A ✓ - 725.441 (Incinerators)? Yes ____ No ____ N/A ✓ - 725.475 (Thermal Treatment)? ✓ Yes ____ No ____ N/A ____ - 725.502 (Chem., Phys., Bio. Treatment)? Yes ____ No ____ N/A ✓				
				8) Summary reports and details of all incidents that require the implementation of the contingency plan as specified in Section 725.156(j)? Yes ____ No ____ N/A ✓				

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No
				9) Records and results of inspections as required by Section 725.115(d)? Yes ____ No ✓ **NOTE: The above information on inspection records need only be kept for three years. This period would automatically be extended during any unresolved enforcement action.** 10) Monitoring, testing or analytical data where required by Sections: - 725.190 (G.W. Monitoring)? Yes ____ No ____ N/A ____ - 725.194 (G.W. Monitoring)? Yes ____ No ____ N/A ____ - 725.376 (Land Treatment)? Yes ____ No ____ N/A ____ - 725.378 (Land Treatment)? Yes ____ No ____ N/A ____ - 735.380(d)(1) (Land Treatment)? Yes ____ No ____ N/A ____ - 725.447 (Incinerators)? Yes ____ No ____ N/A ____ - 725.477 (Thermal Treatment)? Yes ____ No ____ N/A ____ **NOTE: Data required under 725.194 must be kept throughout the post-closure period.**				

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
				11) All closure cost estimates required by Section 725.242? Yes ✓ No ____ N/A ____				
				12) All post-closure cost estimates for disposal facilities required for Section 725.244? Yes ✓ No ____ N/A ____				
OTH	2			**Section 725.174: Availability, Retention and Disposition of Records**		✓		No inspection records, waste analysis plan
			a	During the inspection, were all records including plans required under this Part furnished upon request and made available at all reasonable times for inspection as required by this Section? Yes ____ No ✓ N/A ____				
			c	Upon closure of a waste disposal facility did the owner or operator submit a copy of the record of waste disposal location(s) and quantities to: - The Agency? Yes ____ No ____ - The local land authority? Yes ____ No ____ N/A ____				
			b	Are all required records being maintained and retained during the course of any unresolved enforcement action or as requested by the Director? Yes ____ No ____ N/A ____				

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
OTH	2			**Section 725.175: Annual Report**	✓			
				Has the owner or operator prepared and submitted a copy of a facility annual report, supplied by the Agency, to the Agency by March 1 of each year for the preceding calendar year?				
OTH	1			**Section 725.176: Unmanifested Waste Report**			✓	
				Does the facility accept hazardous waste from off-site? Yes ____ No ____				
				NOTE: If the answer is "Yes", complete this section. If the answer is "No", check "N/A" and skip to 725.177.				
				Has the facility accepted hazardous waste from an off-site source for treatment, storage or disposal without an accompanying manifest or shipping paper? Yes ____ No ____				
				Was the hazardous waste accepted without the manifest or shipping paper exempt from the manifesting requirement by 35 Ill. Adm. Code 721.105? Yes ____ No ____				
				NOTE: If the answer to both the above questions is "Yes", check "N/A". If the answer to the first question is "Yes" and the second "No", answer the following questions:				
				Did the owner or operator complete an unmanifested waste report to include the information required in Section 725.176(a) thru (g)? Yes ____ No ____				

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
				Did the owner or operator submit the unmanifested waste report to the Agency within 15 days of receiving the waste? Yes ____ No ____				
OTH	2			**Section 725.177: Additional Reports**			✓	
				Has the owner or operator submitted to the Agency, as required, reports concerning:				
			a	1) Releases, fires, explosions as specified in Section 725.156? Yes ____ No ____ N/A ____				
			b	2) Groundwater contamination and monitoring data as specified in Sections 725.193 and 725.194? Yes ____ No ____ N/A ____				
			c	3) Facility closure as specified in Section 725.215? Yes ____ No ____ N/A ____				

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
				PART 725 **INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES** **Subparts G and H: Closure, Post-Closure and Financial Requirements**				
CLO	1			**Section 725.212: Closure Plan**	✓			
			a	Was the most current facility closure plan available during the inspection? Yes ✓ No ____				
				Was the closure plan submitted to the Agency within the time frames specified below: - At least 180 days prior to the date closure of the first surface impoundment, waste pile, land treatment or landfill unit was (is) expected to begin? Yes ____ No ____ N/A ____ - At least 180 days prior to the date of final closure of a facility with surface impoundment(s), waste pile(s), land treatment or landfill unit(s)? Yes ____ No ____ N/A ____ - At least 45 days prior to the date of final closure of a facility with any tank(s), container storage or incinerator unit(s)? Yes ____ No ____ N/A ____ - At least 60 days prior to the date closure is expected to begin at a facility with a surface impoundment, waste pile, landfill or land treatment unit which also has an approved closure plan? Yes ____ No ____ N/A ____				

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
				- No later than 15 days after termination of interim status (unless a full operating permit was issued simultaneously)? Yes ____ No ____ N/A ____				
				- No later than 15 days after issuance of a judicial decree or Board Order to cease receiving hazardous waste or close? Yes ____ No ____ N/A ____				
CLO	1			**Section 725.218: Post-Closure Plan**	✓			
			a	Was the most current facility post-closure plan available during the inspection? Yes ✓ No ____				
				Was the post-closure plan submitted to the Agency within the time frames established in this sub-section? Yes ____ No ____ N/A ____				
FIN	1			**Section 725.242: Cost Estimate for Closure**	✓			
				Has the facility prepared a written estimate of the cost of closing the facility? **NOTE: If no closure plan, mark "N/A".**				
FIN	1			**Section 725.244: Cost Estimate for Post-Closure Care**	✓			
				Has the facility prepared a written estimate of the annual cost of post-closure monitoring and maintenance of the facility? **NOTE: If no post-closure plan, mark "N/A".**				

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
				PART 725 **INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES** **Subpart K: Surface Impoundments**				
OTH	1	X		**Section 725.321: Design Requirements**			✓	No new impoundments or expansions of old impoundments. Facility quit putting K062 in the surface impoundment on October 31, 1986.
			a	Has the owner or operator met the requirements for liners and leachate collection systems in accordance with 35 Ill. Adm. Code 724.321(c) for each new unit, or lateral expansion of an existing unit, that is within the area identified in the facility Part A permit application? Yes ____ No ____ N/A ✓				
				NOTE: If "N/A" is checked, provide a detailed explanation of why the site is not subject to the requirements, or why the requirements have been waived by the Agency pursuant to 725.321(c) or (d) and skip to 725.322.				
			a	Did the owner or operator meet the above requirement for waste received after May 8, 1985? Yes ____ No ____				
			b	Has the owner or operator notified the Agency, in writing, at least 60 days prior to receiving waste? Yes ____ No ____				
			b	Did the owner or operator submit a Part B permit application within six months of the Agency's receipt of notification? Yes ____ No ____				
OTH	1	X		**Section 725.322: General Operating Requirements**	✓			
			b	Does the owner or operator make the claim that a free board of less than two feet may be maintained in the surface impoundment? Yes ____ No ✓				

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
			a	Does the surface impoundment have at least two feet of free board? Yes ✓ No ____				
				NOTE: If the claim is made that two feet of free board is not necessary and there is less than two feet of free board, complete the following questions:				
			b	Has the owner or operator obtained certification by a qualified engineer that alternate design features or operating plans will, to the best of the engineer's knowledge and opinion, prevent overtopping of the dike? Yes ____ No ____				
				Is the certification along with a written identification of alternate design features or operating plans preventing overtopping available at the facility? Yes ____ No ____				
OTH	1	X		**Section 725.323: Containment**	✓			
				Are all earthen dikes covered with grass, shale or rock to minimize wind and water erosion and to preserve their natural integrity?				
OTH	1			**Section 725.325: Waste Analysis and Trial Tests**	✓			
			b	Prior to using a surface impoundment to chemically treat a hazardous waste which is substantially different from waste previously treated in the surface impoundment; or chemically treat hazardous waste with a substantially different process than any previously used in that impoundment, has the owner or operator:				Only one waste (K062) in impoundments

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
				1) Conducted waste analysis or trial treatment tests? Yes ____ No ____ N/A ____				
				2) Obtained written, documented information on similar treatment of similar wastes under similar operating conditions to show that this treatment will comply with Section 725.117(b)? Yes ____ No ____ N/A ____				
OTH	2			**Section 725.326: Inspections**	✓			
				Is the owner or operator inspecting:				
			a	1) The free board level at least once each operating day to ensure compliance with Section 725.322? Yes ✓ No ____				
			b	2) The surface impoundment, including dikes and vegetation surrounding the dike, at least once a week to detect any leaks, deterioration or failures in the impoundment? Yes ✓ No ____				
				NOTE: Any evidence of leakage may be a reason to answer "No" to the above questions, even if there are inspection records that indicate that inspections are being done. Review the responses in Section 725.115, General Inspection Requirements, the frequency of inspections, the date of the last inspection, etc. to determine if inspections are actually being done.				

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
CLO	1			**Section 725.328: Closure and Post-Closure Care**			✓	
				NOTE: Determine compliance or non-compliance with this Section only in conjunction with a closure verification inspection conducted after the facility and its independent registered professional engineer have certified closure in accordance with an approved closure plan.				
				Has the owner or operator removed from the impoundment: 1) standing liquids, 2) waste and waste residues, 3) the liner, if any, and 4) underlying and surrounding contaminated soil? Yes ____ No ____ N/A ____				
				Has the owner or operator demonstrated that, at any stage of removal, the remaining materials in the impoundment are not hazardous wastes per Section 721.103(c) and (d)? Yes ____ No ____ N/A ____				
				Has the owner or operator closed the impoundment and provided post-closure care as for a landfill under Subpart G and Section 725.410? Yes ____ No ____ N/A ____				
OTH	1			**Section 725.329: Special Requirements for Ignitable or Reactive Wastes**			✓	
			c	Is the impoundment used solely for emergencies? Yes ____ No ____				
				NOTE: If the answer to this question is "No", complete the rest of this Section.				

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
			a	Have ignitable or reactive wastes been treated, rendered or mixed before or immediately after placement in the impoundment, so that: 1) The resulting waste, mixture or dissolution of material no longer meets the definition of ignitable or reactive waste under Section 721.121 or 721.123? Yes ____ No ____ N/A ____ 2) Section 725.117(b) is complied with? Yes ____ No ____ N/A ____ OR				
			b1	Is the waste managed in such a way that it is protected from any material or condition which may cause it to ignite or react? Yes ____ No ____ N/A ____ AND				
			b2	Has the owner or operator obtained a certification from a qualified chemist or engineer that, to the best of the chemist's or engineer's knowledge and opinion, the design features or operating plans of the facility will prevent ignition or reaction? Yes ____ No ____ N/A ____ AND				
			b3	Is the chemist's or engineer's certification and the basis for it maintained at the facility? Yes ____ No ____ N/A ____ **NOTE: If the answer to any of the previous three questions is "No", the facility is not in compliance.**				

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
OTH	1			**Section 725.330: Special Requirements for Incompatible Waste** Is the owner or operator complying with the requirements concerning the management of incompatible wastes or incompatible wastes and materials contained in this Section?			✓	

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
				PART 725 **INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES** **Subpart L: Waste Piles**				
OTH	1	X		**Section 725.351: Protection from Wind**		✓		
				Is the waste pile subject to dispersal by the wind? Yes ✓ No ____				
				NOTE: If the answer is "Yes", complete the rest of this section. If "No", then check "N/A" and describe why the pile is not subject to wind dispersal in the Remarks.				
				Is the owner or operator: 1) Covering the pile to control dispersal? Yes ____ No ✓ N/A ____ OR 2) Managing the pile by some other means to control dispersal? Yes ____ No ✓ N/A ____				
				NOTE: If the answer to 2 is "Yes", explain in detail the "other means" being used to control dispersal.				
OTH	1			**Section 725.352: Waste Analysis**	✓			
			a1	Are the only wastes the facility receives which are amenable to piling compatible with each other? Yes ✓ No ____				

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	In Apparent Compliance? No	Not Applicable	Remarks or Comment No.
			a2	Is the waste received compatible with the waste in the pile to which it will be added? Yes ✓ No ____				
				NOTE: If the answer to either or both of the above questions is "No", complete the rest of this Section.				
			a	Does the owner or operator take a representative sample of each incoming movement and analyze it prior to adding the waste to any existing pile? Yes ____ No ____				
			b	Does the analysis conducted include the visual comparison of color and texture? Yes ____ No ____				
				Is the analysis conducted capable of differentiating between the types of hazardous waste the owner or operator places in the pile so that the mixing of incompatible wastes does not occur? Yes ____ No ____				
OTH	1	X		**Section 725.353: Containment**		✓		
				Is the leachate or runoff from the waste pile a hazardous waste? Yes ✓ No [redacted] N/A ____				
				NOTE: If the answer is "Yes", complete the rest of this Section. If the answer is "No", check "N/A" and explain why the leachate or runoff is not hazardous waste in the Remarks. If a hazardous waste determination has not been made for leachate runoff from a characteristically hazardous waste pile, 722.111 must be cited.				

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
				Has the owner or operator:				
			a1	1) Placed the pile on impermeable base that is compatible with the waste under the conditions of treatment or storage? Yes ____ No ✓				
			a2	2) Designed, constructed and is operating and maintaining a run-on control system capable of preventing flow onto the active portions of the pile during peak discharges from at least a 25 year storm? Yes ____ No ✓				
			a3	3) Designed, constructed and is operating and monitoring a runoff management system to collect and control at least the water volume resulting from a 24 hour 25 year storm? Yes ____ No ✓				
			a4	4) Emptied or otherwise expeditiously managed the collection and holding facilities associated with run-on and runoff control to maintain design capacity of the system? Yes ____ No ✓				
				OR				
			b1	Is the pile protected from precipitation and run-on by some other means? Yes ____ No ✓				
				AND				
			b2	Have liquids and wastes containing free liquids been placed in the pile? Yes ____ No ✓				

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
OTH	1			**Section 725.354: Design Requirements**		✓		
				Has the owner or operator met the requirements for liners and leachate collection systems or equivalent protection provided in 35 Ill. Adm. Code 724.351 for each new unit, replacement of an existing unit, or lateral expansion of an existing unit that is within the area identified in the facility Part A permit application? Yes ____ No ✓				
				Did the owner or operator meet the above requirements for waste received after May 8, 1985? Yes ____ No ✓				
OTH	1			**Section 725.356: Special Requirements for Ignitable or Reactive Waste**			✓	
				Has the addition of ignitable or reactive waste to the pile been such that:				
			a1	1) The resulting waste or mixture no longer meets the definition of ignitable or reactive waste under Section 721.121 or 721.123? Yes ____ No ____ N/A ____				
			a2	2) Section 725.117(b) is complied with? Yes ____ No ____ N/A ____				
				OR				
			b	Is the waste managed in such a way that it is protected from any conditions or materials which may cause it to ignite or react? Yes ____ No ____				

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
OTH	1			**Section 725.357: Special Requirements for Incompatible Wastes**			✓	
				Is the owner or operator complying with the requirements concerning the management of incompatible waste or incompatible waste and materials contained in this Section?				
CLO	1			**Section 725.358: Closure and Post-Closure Care**			✓	
				NOTE: Determine compliance or non-compliance with this Section only in conjunction with a closure verification inspection conducted after the facility and its independent registered professional engineer have certified closure in accordance with an approved closure plan.				
			a	Has the owner or operator removed or decontaminated all waste residues, contaminated containment system components, contaminated subsoils and structures and equipment contaminated with waste and leachate? Yes ____ No ____ N/A ____				
			a	Have the materials which have been removed been managed as hazardous waste unless Section 721.103(d) applies? Yes ____ No ____ N/A ____				
			b	Has the owner or operator found that all contaminated subsoils can be practically removed or decontaminated (after making all reasonable efforts to remove or decontaminate them)? Yes ____ No ____				
				NOTE: If the answer to the above question is "No", complete the following question.				
			b	Did the owner or operator close the facility and is he performing post-closure care in accordance with the closure requirements that apply to landfills? Yes ____ No ____				

JOHN ASHCROFT
Governor

FREDERICK A. BRUNNER
Director

STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES

DIVISION OF ENVIRONMENTAL QUALITY
P.O. Box 176
Jefferson City, MO 65102

Division of Energy
Division of Environmental
Division of Geology and La
Division of Management
Division of Parks, Recre
and Historic Preserv

April 22, 1988

Mr. Robert J. Schreiber, Jr., P.E.
Lafser & Schreiber, Inc.
5050 Oakland Ave.
St. Louis, MO 63110

Dear Mr. Schreiber:

This letter is written in reply to your letter of April 5, 1988 concerning the reus of wastewater treatment sludge generated by Olin Brass Group in East Alton, Illinois, which has previously been shipped as EPA codes K044, K046, F006, F007, F009 and D008. As was indicated in Ms. Sandra Carroll's letter of December 28, 1987, the Waste Management Program concurs that the sludge, when used as a substitute for raw material in the manufacture of cement, is not a solid waste. However, to qualify as a raw ingredient, the sludge must contain only inorganic contaminants. Further, the resulting cement must be an acceptable product meeting measurable ASTM standard without dilution. This regulatory strategy has been discussed with Marc Rivas of the Hazardous Waste Section of Region VII U.S. EPA, ar Matt Strauss of the Office of Solid Waste in Washington, D.C. They have concurred with our determination concerning a similar situation.

Since the material is not a solid waste and therefore not a hazardous waste there no regulatory requirement to manifest the material to Continental. However, there is no regulatory problem with the material being manifested. Continental will be required to have an EPA ID number, which I understand they already have, and can accept the material as a non-hazardous substitute material upon arrival. When filing the "Generator's Hazardous Waste Report Summary Sheet" with the department, Olin Brass Group should use D099 for the hazardous waste number. This will flag t material as being non-hazardous for tax and fee purposes.

I hope this clarifies our position on this matter. If there are additional questions concerning the sludge being used as a substitute for a raw material, please feel free to contact this office at (314) 751-3176.

Sincerely,

DIVISION OF ENVIRONMENTAL QUALITY

Kenneth J. Davis

Kenneth J. Davis
Chief, Data Management Unit
Waste Management Program

KJD:tm

cc: Fred Lafser ✓

SUBBERT. BENNINGTON
BARDWELL

209600

D BENNINGTON JGR DB 6034-162

DALE BENNINGTON

NB

S22650

7

RESOURCE RECOVERY ,INC
5050 OAKLAND AVENUE
ST LOUIS MISSOURI 63110
ATT-"SKIP" H.W. FRAGO .

ST

NET 30 YOUR TRUCK 11/7-11/9 OUR PLANT

11/7/85

3 LOADS TRANSPORT AND REUSE (RECYCLE) ELECTRIC FURNACE DUST (HAZARDOUS WASTE-K061) IN CONTINENTAL CEMENT COMPANY'S, HANNIBAL, MISSOURI RESOURCE RECOVER FACILITY.

THIS PURCHASE ORDER IS FOR 3 TRUCKLOADS OF DUST LOADED ONTO TRUCK PROVIDED BY RESOURCE RECOVERY. EACH LOAD TO BE WEIGHED AT KEYSTONE'S TRUCK SCALE. HAZARDOUS WAS TAX DOES NOT APPLY.

1 LOAD ON 11/7
1 LOAD ON 11/8
1 LOAD ON 11/9

COST CONFI

DB

RESOURCE RECOVERY, INC. # 08 1321

A Subsidiary of

Industrial Waste Management, Inc.

CERTIFICATE OF RAW MATERIAL USAGE

COMPANY: KEYSTONE STEEL & WIRE

ADDRESS: 7000 S.W. ADAMS STREET PEORIA, IL 61641

ATTENTION: _____

This document certifies that the waste material(s) removed from your facility on 11-7-88 under manifest number 0001 was used as an ingredient in an industrial process to make a product per 40 CFR 261.2(e)(1)(i) at Continental Cement Company, Highway 79 South, Hannibal, Missouri 63401.

The waste material(s) consisted of:

_____

_____

_____

_____

Transported by: BOB'S HOME SERVICE

_____

_____

Date of Usage: 11-8-88

We apreciate your business.

Bill Beucke

RRI Representative

5050 Oakland Avenue

St. Louis, Missouri 63110

(314) 534-2266

7/88

SEE INSTRUCTIONS ON REVERSE

FACILITY THEN TRANSMITTED TO THE DEPARTMENT BY THE GENERATOR.

Bill Beucke

FOR THE COM- THIS FORM ARE ON A SHEET. DOCUMENT MUST BE USED ALL MISSOURI-DESTINED SHIPMENTS

MISSOURI DEPARTMENT OF NATURAL RESOURCES
Division of Environmental Quality
Waste Management Program
P.O. Box 176 Jefferson City, Missouri 65102
314-751-3176

EMERGENCY RESPONSE
U.S. COAST GUARD
1-800-424-8802
CHEM TREC
1-800-424-9300
DEPT. OF NATURAL RESOURCES
314-634-2436

HAZARDOUS WASTE MANIFEST

Please print or type (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039. Expires 9-30-88

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. I L D 0 0 0 7 1 4 8 8 1 — Manifest Document No. 0 0 0 0 1

2. Page ____ of ____ — Information in the shaded areas is required by State law.

3. Generator's Name and Mailing Address
Keystone Steel & Wire
7000 S. W. Adams Street, Peoria, Ill. 61641

4. Generator's Phone (309) 697-7552

A. Missouri Manifest Document Number 0 0 1 3 2 1 [redacted] 0 0 0 1

B. State Generator's ID - other

5. Transporter 1 Company Name: B.H.S., Inc.

6. US EPA ID Number: M O D 0 6 8 5 2 1 2 2 8

C. MO. Transporter's ID: H-1002

D. Transporter's Phone: 314-745-3371

7. Transporter 2 Company Name

8. US EPA ID Number

E. MO. Transporter's ID

F. Transporter's Phone

9. Designated Facility Name and Site Address
Continental Cement Co.
P. O. Box 71
Hannibal, Mo. 63401

10. US EPA ID Number: M O D 0 5 4 0 1 8 2 8 8

G. State Facility's ID: RR-277

H. Facility's Phone: 314 221-1740

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers		13. Total Quantity	14. Unit Wt/Vol.	I. Waste No.
a. RQ--100 lbs. Hazardous Waste Solid NOS ORME NA9189 ~~[illegible]~~ K061 ER#31	0 0 1	DT	002 1/2	T	MO. Other ~~D099~~
b.					MO. Other
c.					MO. Other
d.					MO. Other

J. Additional Descriptions for Materials Listed Above — K. Handling Codes for Wastes Listed Above

a. Mo. DNR WAste Code D099

15. Special Handling Instructions and Additional Information
Return waste to generator if undeliverable
Avoid contact with skin. Wash with soap and water.

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and applicable state regulations.
If I am a large quantity operator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method available to me that I can afford.

Printed/Typed Name: DALE BENNINGTON — Signature: Dale Bennington — Month Day Year: 11 10 88

17. Transporter 1 Acknowledgement of Receipt of Materials — Date

Printed/Typed Name: Douglas Butler — Signature: Douglas L. [illegible] — Month Day Year: 11 10 88

18. Transporter 2 Acknowledgement of Receipt of Materials — Date

Printed/Typed Name — Signature — Month Day Year

19. Discrepancy Indication Space
This material will be used or reused as an ingredient to make a product as per 40 CFR 261.2 (e) (1) (i)

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Continental Cement Co — Date

Printed/Typed Name: Bill Beucke — Signature: Bill Beucke — Month Day Year: 11 10 88

GENERATOR — TRANSPORTER — FACILITY

MISSOURI DNR FINAL COPY — PART 1

THIS COPY MUST BE SENT BACK TO THE GENERATOR BY THE DESIGNATED FACILITY THEN TRANSMITTED TO THE DEPARTMENT BY THE GENERATOR.

EPA Form 8700-22 (Rev. 9-86) MDNR-HWG 10 PREVIOUS EDITIONS ARE OBSOLETE

RESOURCE RECOVERY, INC.

A Subsidiary of

Industrial Waste Management, Inc.

CERTIFICATE OF RAW MATERIAL USAGE

COMPANY: KEYSTONE STEEL & WIRE

ADDRESS: 7000 S.W. Adams Street, Peoria, IL 61641

ATTENTION: _____

This document certifies that the waste material(s) removed from your facility on 11-9-88 under manifest number #0003 was used as an ingredient in an industrial process to make a product per 40 CFR 261.2(e)(1)(i) at Continental Cement Company, Highway 79 South, Hannibal, Missouri 63401.

The waste material(s) consisted of:

Electric Arc Furnace Dust

Transported by: Bob's Home Service, Inc.

Date of Usage: 11-11-88

We apreciate your business.

Bill Beucke

RRI Representative

5050 Oakland Avenue

St. Louis, Missouri 63110

(314) 534-2266

7/88

ION OF THIS FORM ARE ON A SEPARATE SHEET.
THIS DOCUMENT MUST BE USED FOR ALL MISSOURI-DESTINED SHIPMENTS.

Waste Management Program
P.O. Box 176 Jefferson City, Missouri 65102
314-751-3176

on 11/27/88. DB

1-800-424-8802
CHEM TREC
1-800-424-9300
DEPT. OF NATURAL RESOURCES
314-634-2436

HAZARDOUS WASTE MANIFEST

Please print or type (Form designed for use on elite (12-pitch) typewriter)

Form Approved. OMB No. 2050-0039. Expires 9-30-88

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. I L D 0 0 0 7 1 4 8 8 1 — Manifest Document No. 0 0 0 3

2. Page ____ of ____

Information in the shaded areas is required by State law.

3. Generator's Name and Mailing Address
Keystone STeel & Wire
7000 S. W. Adams Street, Peoria, Ill. 61641

4. Generator's Phone (309) 697-7552

A. Missouri Manifest Document Number 0 0 1 3 2 1 [redacted] 0 0 0 3

B. State Generator's ID other

5. Transporter 1 Company Name: B.H.S., Inc.

6. US EPA ID Number: M O D 0 6 8 5 2 1 2 2 8

C. MO. Transporter's ID: H-1002

D. Transporter's Phone: 314-745-3371

7. Transporter 2 Company Name

8. US EPA ID Number

E. MO. Transporter's ID

F. Transporter's Phone

9. Designated Facility Name and Site Address
Continental Cement Co.
P. O. Box 71
Hanniabl, Mo. 63401

10. US EPA ID Number: M O D 0 5 4 0 1 8 2 8 8

G. State Facility's ID: RR-277

H. Facility's Phone: 314-221-1740

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers		13. Total Quantity	14. Unit Wt/Vol.	Waste No.
a. RQ--100 lbs. Hazardous Waste Solid NOS ORME NA9189 ~~F006~~ K061 ER#31	0 0 1	DT	021.17	T	MO: Other: D099
b.					MO: Other:
c.					MO: Other:
d.					MO: Other:

J. Additional Descriptions for Materials Listed Above
Mo. DNR Waste Code D099

K. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information
Return waste to generator if undeliverable
Avoid contact with skin. Wash with soap and water

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and applicable state regulations.
If I am a large quantity operator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method available to me that I can afford.

GENERATOR — Printed/Typed Name: DALE BENNINGTON — Signature: Dale Bennington — Month Day Year: 11 09 88

TRANSPORTER — 17. Transporter 1 Acknowledgement of Receipt of Materials — Printed/Typed Name: Douglas Butner — Signature: Douglas L — Date: Month Day Year: 11 09 88

18. Transporter 2 Acknowledgement of Receipt of Materials — Printed/Typed Name — Signature — Date: Month Day Year

FACILITY — 19. Discrepancy Indication Space
This material will be used or reused as an ingredient to make a product as per 40 CFR 261.2 (e) (1) (i).

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Continental Cement Co

Printed/Typed Name: Bill Beucke — Signature: Bill Beucke — Date: Month Day Year: 11 10 88

Form 8700-22 (Rev. 9-86) MDNR-HWG 10 PREVIOUS EDITIONS ARE OBSOLETE

MISSOURI DNR FINAL COPY — PART 1

THIS COPY MUST BE SENT BACK TO THE GENERATOR BY THE DESIGNATED FACILITY THEN TRANSMITTED TO THE DEPARTMENT BY THE GENERATOR.

RESOURCE RECOVERY, INC.

A Subsidiary of

Industrial Waste Management, Inc.

CERTIFICATE OF RAW MATERIAL USAGE

COMPANY: KEYSTONE STEEL & WIRE

ADDRESS: 7000 S.W. Adams Street, Peoria, IL 61641

ATTENTION: _____

This document certifies that the waste material(s) removed from your facility on 11-8-88 under manifest number 0002 was used as an ingredient in an industrial process to make a product per 40 CFR 261.2(e)(1)(i) at Continental Cement Company, Highway 79 South, Hannibal, Missouri 63401.

The waste material(s) consisted of:

Electric Arc Furnace Dust

Transported by: Bob's Home Service, Inc.

Date of Usage: 11-9-88

We apreciate your business.

Bill Beucke
RRI Representative

5050 Oakland Avenue

St. Louis, Missouri 63110

(314) 534-2266

7/88

...FOR THE COM-
...OF THIS FORM ARE ON A
...TE SHEET.
...DOCUMENT MUST BE USED
...OR ALL MISSOURI-DESTINED
...HIPMENTS.

...DEPARTMENT OF NATURAL RESOURCES
Division of Environmental Quality
Waste Management Program
P.O. Box 176 Jefferson City, Missouri 65102
314-751-3176

HAZARDOUS WASTE MANIFEST

EMERGENCY RESPONSE
U.S. COAST GUARD
1-800-424-8802
CHEM TREC
1-800-424-9300
DEPT. OF NATURAL RESOURCE
314-634-2436

Please print or type (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039. Expires 9-30-88

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: ILD 0 0 0 7 1 4 8 8 1 — Manifest Document No.: 00002
2. Page ___ of ___ — Information in the shaded areas is required by State law.

3. Generator's Name and Mailing Address:
Keystone Steel & Wire
7000 S. W. Adams Street
Peoria, Illinois 61641

4. Generator's Phone ( ) 309 697-7552

A. Missouri Manifest Document Number: 0 0 1 3 2 1 [redacted] 0 0 0 2
B. State Generator's ID - other:

5. Transporter 1 Company Name: B.H.S, Inc. ±
6. US EPA ID Number: M O D 0 6 8 5 2 1 2 2 8
C. MO. Transporter's ID: H-1002
D. Transporter's Phone: 314 745-3371

7. Transporter 2 Company Name:
8. US EPA ID Number:
E. MO. Transporter's ID:
F. Transporter's Phone:

9. Designated Facility Name and Site Address:
Continental Cement Company
P. O. Box 71
Hannibal, Mo. 63401

10. US EPA ID Number: M O D 0 5 4 0 1 8 2 8 8
G. State Facility's ID: RR-27
H. Facility's Phone: 314 221-1740

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers		13. Total Quantity	14. Unit Wt/Vol.	I. Waste No.
a. RQ--100 lbs. Hazardous Waste Solid NOS ORME NA9189 ~~D006~~ K061 ER#31	0 0 1	D T	0 2 0 8 3	T	MO. Other: D099 D0099
b.					MO. Other:
c.					MO. Other:
d.					MO. Other:

J. Additional Descriptions for Materials Listed Above: Mo. DNR Waste Code D099
K. Handling Codes for Wastes Listed Above:

15. Special Handling Instructions and Additional Information
Return waste to generator if undeliverable
Avoid contact with skin. Wash with soap and water.

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and applicable state regulations.
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Printed/Typed Name: DALE BENNINGTON — Signature: Dale Bennington — Month Day Year: 11 08 88

17. Transporter 1 Acknowledgement of Receipt of Materials — Date
Printed/Typed Name: Douglas Butner — Signature: Douglas Butner — Month Day Year: 11 08 88

18. Transporter 2 Acknowledgement of Receipt of Materials — Date
Printed/Typed Name: — Signature: — Month Day Year:

19. Discrepancy Indication Space
This material will be used or reused as an ingredient to make a product as per 40 CFR 261.2 (e) (1) (i).

Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Continental Cement Co — Date
Printed/Typed Name: Bill Bencke — Signature: Bill Bencke — Month Day Year: 11 08 88

...8700-22 (Rev. 9-86) MDNR-HWG 10 PREVIOUS EDITIONS ARE OBSOLETE

GENERATOR

MISSOURI DNR FINAL COPY — PART 1

THIS COPY MUST BE SENT BACK TO THE GENERATOR BY THE DESIGNATED FACILITY THEN TRANSMITTED TO THE DEPARTMENT BY THE GENERATOR.

Please print or type with ELITE type (12 characters per inch) in the unshaded areas only

EPA No. 0265-EF

EPA

MoDNR

COMBINED NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

Send to: Missouri Department of Natural Resources, Waste Management Program, P.O. Box 176, Jefferson City, MO 65102

For Official Use Only

Comments

C
C

Installation's EPA ID Number	Accepted	Date Received: Yr.	mo.	day
C 1 F N/A C 1				

I. Name of Installation

C 2 CONTINENTAL

II. Installation Mailing Address

Street or P.O. Box

C 3 P O BOX 902

City or Town	State	ZIP Code
C 4 HANNIBAL	MO	63401

III. Location of Installation

Street or Route Number

C 5 HIGHWAY 79

City or Town	State	ZIP Code
C 6 HANNIBAL	MO	63401

IV. Installation Contact

Name and Title (last, first, and job title)	Phone Number (area code and number)
C 7 CARTER, FRED A. PRES	314-221-1711

V. Ownership

A. Name of Installation's Legal Owner	B. Type of Ownership (enter)
C 8 CONTINENTAL COMMODITIES	P

VI. Type of Regulated Waste Activity (Mark "X" in the appropriate boxes. Refer to instructions.)

A. Hazardous Waste Activity

- [ ] 1a. Generator
- [ ] 1b. Less than 1,000 kg/mo.
- [ ] 2. Transporter
- [ ] 3. Treatment/Storage/Disposal
- [ ] 4. Underground Injection
- [ ] 5. Marketer or Burner of Hazardous Waste Fuel (enter "X" and mark appropriate boxes below)
  - [ ] a. Generator Marketing to Burner
  - [ ] b. Other Marketer
  - [ ] c. Burner

B. Used Oil Fuel Activities

- [X] 1. Off-Specification Used Oil Fuel (enter "X" and mark appropriate boxes below)
  - [ ] a. Generator Marketing to Burner
  - [ ] b. Other Marketer
  - [X] c. Burner
- [X] 2. Specification Used Oil Fuel Marketer or Burner (Burner Who First Claims the Oil Meets the Specification)

VII. Waste Fuel Burning: Type(s) of Combustion Device (enter "X" in all appropriate boxes to indicate type of combustion device in which hazardous waste fuel or off-specification used oil is burned. See instructions for definitions of combustion devices.)

- [ ] A. Utility Boiler
- [ ] B. Industrial Boiler
- [X] C. Industrial Furnace

VIII. Mode of Transportation (transporters only: enter "X" in the appropriate box(es))

- [ ] A. Air
- [ ] B. Rail
- [ ] C. Highway
- [ ] D. Water
- [ ] E. Other (specify)

IX. First or Subsequent Notification

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your installation's EPA ID Number in the space provided below.

- [ ] A. First Notification
- [X] B. Subsequent Notification (complete item C)

C. Installation's EPA ID Number: MOD054918 2

Continue

...tion of Hazardous Wastes (continued from front)

...rom Nonspecific Sources (F-List). Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste ... nonspecific sources your installation handles. Below each number, enter monthly generation amount in pounds and frequency code A, B, or C.

WASTE ID #	F003	F005	F001	F002
AMOUNT AND FREQUENCY	lbs	lbs	lbs	lbs

Wastes from Specific Sources (K-List). Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific sources your installation handles. Below each number, enter the monthly generation amount in pounds and frequency code A, B, or C.

WASTE ID #	K022	K048	K049	K052
AMOUNT AND FREQUENCY	lbs	lbs	lbs	lbs

C. Commercial Chemical Product Wastes (U and P Lists). Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Below each number, enter monthly generation amount in pounds and frequency A, B, or C.

WASTE ID #	U001	U002	U008	U012
AMOUNT AND FREQUENCY	lbs	lbs	lbs	lbs

D. (Reserved)

E. Characteristics of Ignitable Hazardous Wastes. Mark an "X" in the box corresponding to the characteristics of ignitable hazardous wastes your installation handles. (See 40 CFR Parts 261.21 - 261.24) Below each box that you check, enter the monthly generation amount expressed in pounds and generation frequency code A, B, or C.

	X 1. Ignitable (D001)	2. Corrosive (D002)	3. Reactive (D003)
AMOUNT AND FREQUENCY	lbs	lbs	lbs

X 4. Toxic. Enter the four-digit number which identifies each characteristic toxic waste. Below each number enter the monthly generation amount and frequency.

	D005	D006	D007	D008
AMOUNT AND FREQUENCY	lbs	lbs	lbs	lbs

MISSOURI REQUIRED INFORMATION

MO Generator ID Number _____

Principle Business Activity Portland cement manufacturing

S.I.C. Code (leave blank if uncertain) 3241

Check this box if you generate/accumulate less than a regulated quantity ☐

XI. Certification

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Signature	Name And Official Title (Type Or Print)	Date Signed
Frank C. Stevens	Frank C. Stevens, President Continental Cement Co., Inc.	6-22-

Continuation Sheet
for
Combined Notification of Hazardous Waste Activity
(See reverse side of this form for specific instructions)

Name of Installation: Continental

Location of Installation: Highway 79
Street or Route Number
Hannibal, MO 63401
City, State, and Zip Code

II. Identification Numbers If Previously Assigned

EPA # MOD054018288 MISSOURI #

IV. Hazardous Waste Description

Enter the four-digit EPA waste number from 40 CFR Part 251 for each additional waste stream. Below [illegible] EPA waste number which is entered, enter the monthly generation amount in pounds and frequency bod[illegible] D, or C.

WASTE ID #	F004	D009		
AMOUNT AND FREQUENCY	lbs	lbs	lbs	lbs
WASTE ID #	K086	K085	K095	K096
AMOUNT AND FREQUENCY	lbs	lbs	lbs	lbs
WASTE ID #	U031	U037	U045	U051
AMOUNT AND FREQUENCY	lbs	lbs	lbs	lbs
WASTE ID #	U052	U055	U056	U057
AMOUNT AND FREQUENCY	lbs	lbs	lbs	lbs
WASTE ID #	U069	U080	U083	U092
AMOUNT AND FREQUENCY	lbs	lbs	lbs	lbs

V. Certification

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Signature	Name And Official Title (Type Or Print)	Date Signed
Frank C. Stevens	Frank C. Stevens, President Continental Cement Co.	6-28-88

MONR Form HWG - 1A (Continuation Sheet for EPA Form 8700 -12/ MONR HWG -1 ; Revised 7-87)

Combined Notification of Haz...
(See reverse side of this form for specific ...

Name of Installation: Continental

Location of Installation: Highway 79 (Street or Route Number)
Hannibal, MO 63401 (City, State, and Zip Code)

MISSOURI =

Identification Numbers If Previously Assigned

EPA = M O D Ø 5 4 Ø 1 3 2 8 3

IV. Hazardous Waste Description

Enter the four-digit EPA waste number from 40 CFR Part 261 for each additional waste stream. Below each EPA waste number which is entered, enter the monthly generation amount in pounds and frequency code A, B, or C.

WASTE ID #	U102	U110	U112	U113
AMOUNT AND FREQUENCY	lbs	lbs	lbs	lbs
WASTE ID #	U117	U118	U121	U124
AMOUNT AND FREQUENCY	lbs	lbs	lbs	lbs
WASTE ID #	U125	U140	U152	U15[illegible]
AMOUNT AND FREQUENCY	lbs	lbs	lbs	[illegible]
WASTE ID #	U154	U156	U15[illegible]	U16[illegible]
AMOUNT AND FREQUENCY	lbs	lbs	lbs	
WASTE ID #	U162	U165	U171	U1[illegible]
AMOUNT AND FREQUENCY	lbs	lbs	lbs	

V. Certification

I certify under penalty of law that I have personally examined and am familiar with the information sub... all attached documents, and that based on my inquiry of those individuals immediately responsible for ... information, I believe that the submitted information is true, accurate, and complete. I am aware th... significant penalties for submitting false information, including the possibility of fine and impriso...

Signature: Frank C. Stevens

Name and Official Title (Type Or Print): Frank C. Stevens, President
Continental Cement Co.

for

Combined Notification of Hazardous Waste Activity

(See reverse side of this form for specific instructions)

Name of Installation: Continental

Location of Installation: Highway 79
Street or Route Number

Hannibal, MO 63401
City, State, and Zip Code

Identification Numbers if Previously Assigned

EPA # M0D054018288 MISSOURI #

Hazardous Waste Description

Enter the four-digit EPA waste number from 40 CFR Part 261 for each additional waste stream. Below each EPA waste number which is entered, enter the monthly generation amount in pounds and frequency code A, B, or C.

WASTE ID #	U210	U213	U220	U226
AMOUNT AND FREQUENCY	lbs	lbs	lbs	lbs
WASTE ID #	U228	U239	U070	U077
AMOUNT AND FREQUENCY	lbs	lbs	lbs	lbs
WASTE ID #	U277	U003	U188	K046
AMOUNT AND FREQUENCY	lbs	lbs	lbs	lbs
WASTE ID #	F006	D004	K014	K046
AMOUNT AND FREQUENCY	lbs	lbs	lbs	lbs
WASTE ID #	K061	K069		
AMOUNT AND FREQUENCY	lbs	lbs	lbs	lbs

V. Certification

I certify under penalty of law that I have personally examined and am familiar with the information submitted in th all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Signature: Frank C. Stevens

Name and Official Title (Type Or Print): Frank C. Stevens, President, Continental Cement Co.

Date Signed: 6-28-

Sheet for FRP Form 8700-12/ MONR HWG-1 (Revised 7-87)

EPA

(Read the "General Instructions" before starting.)

I. EPA I.D. NUMBER	PLEASE PLACE LABEL IN THIS SPACE
II. FACILITY NAME	
III. FACILITY MAILING ADDRESS	
IV. FACILITY LOCATION	

GENERAL INSTRUCTIONS: If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross it through in red and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent (the area to the left of the label space lists the information that should appear), please provide it in the proper fill-in area(s) below. If the label is complete and correct, you need not complete Items I, III, V, and VI (except VI-B which must be completed regardless). Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.

POLLUTANT CHARACTERISTICS

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms.

SPECIFIC QUESTIONS	MARK 'X' YES	MARK 'X' NO	MARK 'X' ATTACHED	SPECIFIC QUESTIONS	MARK 'X' YES	MARK 'X' NO	MARK 'X' ATTACHED
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)		X		B. Does or will this facility (either existing or proposed) include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)		X	
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)		X		D. Is this a proposed facility (other than those described in A or B above) which will result in a discharge to waters of the U.S.? (FORM 2D)		X	
E. Does or will this facility treat, store, or dispose of hazardous waste? (FORM 3)	X		X	F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing within one-quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production; inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X		H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X		J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	

III. NAME OF FACILITY

1 SKIP CONTINENTAL

IV. FACILITY CONTACT

A. NAME & TITLE (last, first, & title)	B. PHONE (area code & no.)
2 LAFSER, FRED A., PRESIDENT,	314 221 1740

V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX	B. CITY OR TOWN	C. STATE	D. ZIP CODE
3 P. O. BOX 902	4 HANNIBAL	MO	63401

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER	B. COUNTY NAME
5 HWY. 79	RALLS

C. CITY OR TOWN	D. STATE	E. ZIP CODE	F. COUNTY CODE (if known)
6 HANNIBAL	MO	63401	

B. FIRST

(specify) MANUFACTURE OF PORTLAND CEMENT | C. 7 | (specify)

C. THIRD | D. FOURTH

(specify) | C. 7 | (specify)

OPERATOR INFORMATION

A. NAME

CONTINENTAL

E. Is the name listed in Item VIII-A also the owner? ☐ YES ☒ NO

C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)

F - FEDERAL
S - STATE
P - PRIVATE
M - PUBLIC (other than federal or state)
O - OTHER (specify)

D. PHONE (Area code & no.): A 314 334 2266

E. STREET OR P.O. BOX

P.O. BOX 902

F. CITY OR TOWN: HANNIBAL | G. STATE: MO | H. ZIP CODE: 63401

IX. INDIAN LAND: Is the facility located on Indian lands? ☐ YES ☒ NO

EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharge to Surface Water): N

B. PSD (Air Emissions from Proposed Sources): 9 P

E. UIC (Underground Injection of Fluids): U

F. OTHER (specify): 9 (specify)

G. RCRA (Hazardous Wastes): R

H. OTHER (specify): 9 (specify) * SEE ATTACHMENT A

MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

NATURE OF BUSINESS (provide a brief description)

SEE ATTACHMENT B

III. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE (type or print)	B. SIGNATURE	C. DATE SIGNED
Frank C. Stevens, President Continental Cement Company	Frank C. Stevens	6-28-88

COMMENTS FOR OFFICIAL USE ONLY

ATTACHMENT "A" TO FORM 1

EXISTING ENVIRONMENTAL PERMITS

Resource Recovery Certification RR-277
Classification R2

Resource Recovery Certification RR-188
Classification R2

Combustion and Incineration Permit
No. 1086-004A Ralls County, Missouri

Storage Hazardous Waste Fuel Permit
No. 0586-002 Ralls County, Missouri

EPA Permit I.D. No. MOD054018288
(Interim Status Storage and Treatment Facility

ATTACHMENT "B" TO FORM 1
NATURE OF BUSINESS

CONTINENTAL CEMENT COMPANY, INC.
HANNIBAL CEMENT PLAN

Continental Cement Company, Inc. operates a manufacturing plant at Hannibal, Missouri and its major product is portland cement. Cement produced by the company is sold primarily to ready mix concrete plants, building material dealers, contractors, concrete products plants, and federal and state governmental agencies.

Portland cement is an important and basic construction material. It is the principal ingredient in concrete and is widely used in virtually all types of industrial, commercial, residential, farm and public construction. The term "portland cement" is not a brand name but is used to describe a type of cement first made in England and so designated because it produced a grey concrete which resembled stone quarried on the Isle of Portland off the coast of England. The term was originally used to distinguish chemically made cement from natural cement. Today, almost all cement is chemically made and is therefore portland cement.

The cement manufacturing process requires a significant amount of raw materials with a defined chemical make-up. Various waste solids also have a similar chemical make-up. In addition, significant amounts of energy are required in the cement manufacturing process.

Continental Cement Company has entered into an agreement with Resource Recovery, Inc. to operate all hazardous waste units at this facility. Continental Cement Company, however, will still remain the owner of these hazardous waste units.

EPA

HAZARDOUS WASTE PERMIT APPLICATION

Consolidated Permits Program

(This information is required under Section 3005 of RCRA.)

I	E	M	O	D	Ø	5	4	Ø	1	-	8	2	8

OFFICIAL USE ONLY

APPLICATION APPROVED	DATE RECEIVED (yr., mo., & day)	COMMENTS

I. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below *(mark one box only)* to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in item I above.

A. FIRST APPLICATION *(place an "X" below and provide the appropriate date)*

☐ 1. EXISTING FACILITY *(See instructions for definition of "existing" facility. Complete item below.)*

C 8 — FOR EXISTING FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED *(see the back to the left)*

☐ 2. NEW FACILITY *(Complete item below)* — FOR A NEW FACILITY, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR IS EXPECTED TO BEGIN

B. REVISED APPLICATION *(place an "X" below and complete item I above)*

☒ 1. FACILITY HAS INTERIM STATUS

☐ 2. FACILITY HAS A RCRA PERMIT

III. PROCESSES – CODES AND DESIGN CAPACITIES

A. PROCESS CODE – Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, describe the process *(including its design capacity)* in the space provided on the form *(Item III-C)*.

B. PROCESS DESIGN CAPACITY – For each code entered in column A enter the capacity of the process.
1. AMOUNT – Enter the amount.
2. UNIT OF MEASURE – For each amount entered in column B(1), enter the code from the list of unit of measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:		
CONTAINER (other than tank)	S01	GALLONS OR LITERS
TANK	S02	GALLONS OR LITERS
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS
Disposal:		
INJECTION WELL	D79	GALLONS OR LITERS
LANDFILL	D80	ACRE-FEET *(the volume that would cover one acre to a depth of one foot)* OR HECTARE-METER
LAND APPLICATION	D81	ACRES OR HECTARES
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS

PROCESS	PROCESS CODE	APPROPRIATE UNIT OF MEASURE FOR PROCESS DESIGN CAPACITY
Treatment:		
TANK	T01	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR GALLONS PER HOUR LITERS PER HOUR
OTHER *(Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided, Item III-C.)*	T04	GALLONS PER DAY OR LITERS PER DAY

UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G	LITERS PER DAY	[illegible]	ACRE-FEET	[illegible]
LITERS	L	TONS PER HOUR	[illegible]	HECTARE-METER	[illegible]
CUBIC YARDS	Y	METRIC TONS PER HOUR	[illegible]	ACRES	[illegible]
CUBIC METERS	C	GALLONS PER HOUR	[illegible]	HECTARES	[illegible]
GALLONS PER DAY	U	LITERS PER HOUR	[illegible]		

EXAMPLE FOR COMPLETING ITEM III *(shown in line numbers X-1 and X-2 below)*: A facility has two storage tanks, one tank can hold 300 gallons, the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

C DUP 1

LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT (specify)	B. PROCESS DESIGN CAPACITY 2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY	LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT	B. PROCESS DESIGN CAPACITY 2. UNIT OF MEASURE (enter code)
X-1	S02	600	G		5			
X-2	T03	20	E		6			
1	S02	150,000	G		7			
2	T04	2,000	E		8			
3	S02	74,000	G		9			
4					10			

supplemental fuel to replace a portion of the energy presently supplied by coal to the rotary kiln. The substitution rate will vary based on heat content and density of the supplemental fuels and kiln operating conditions. The kiln is classified as an industrial furnace under RCRA, and the process is energy recycling of otherwise waste products.

IV. DESCRIPTION OF HAZARDOUS WASTES

A. EPA HAZARDOUS WASTE NUMBER — Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you plan to handle. For hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describe the characteristic and/or the toxic contaminant of those hazardous wastes.

B. ESTIMATED ANNUAL QUANTITY — For each listed waste entered in column A, estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A, estimate the total annual quantity of all the non-listed wastes which possess that characteristic or contaminant.

C. UNIT OF MEASURE — For each quantity entered in column B, enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:
   For listed hazardous wastes: For each listed hazardous waste entered in column A, select the code(s) from the list of processes contained in Item IV-D(1) to indicate how the waste will be stored, treated, and/or disposed of at the facility.
   For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of processes contained in Item IV-D(1) to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.
   Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "00" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional codes.

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on page 4.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on the line included with above, "and" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes that are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D.1)
X-1	K054	900	P	T03 D80	
X-2	D002	400	P	T03 D80	
X-3	D001	100	P	T03 D80	—
X-4	D002				included with above

this page before completing if you have more than 26 wastes to list

Form Approved OMB No. 158-S80004

NUMBER (enter from page 1)	FOR OFFICIAL USE ONLY
Ø 5 4 Ø 1 8 2 8 8 T/A C 1	W DUP T/A C 2 DUP

DESCRIPTION OF HAZARDOUS WASTES (continued)

	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (If a code is not entered in D(1))
1	U031	Included in above		S02 T04	
2	U037	"		S02 T04	
3	U045	"		S02 T04	
4	U051	"		S02 T04	
5	U052	"		S02 T04	
6	U055	"		S02 T04	
7	U056	"		S02 T04	
8					
9	U057	"		S02 T04	
10	U069	"		S02 T04	
11	U080	"		S02 T04	
12	U088	"		S02 T04	
13	U092	"		S02 T04	
14	U102	"		S02 T04	
15	U110	"		S02 T04	
16	U112	"		S02 T04	
17	U113	"		S02 T04	
18	U117	"		S02 T04	
19	U118	"		S02 T04	
20	U121	"		S02 T04	
21	U124	"		S02 T04	
22	U125	"		S02 T04	
23	U140	"		S02 T04	
24	U152	"		S02 T04	
25					
26					

EPA Form 3510-3 (5-80)

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(If "B", "C" etc. behind the "3" to identify photocopied pages)

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...MBER (enter from page 1)	FOR OFFICIAL USE ONLY	
...0 5 4 0 1 8 2 8 8	W DUP	2 DUP

...RIPTION OF HAZARDOUS WASTES (continued)

	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
1	F003	1,000,000-6,000,000	G	S02 T04	
2	F005	1,000,000-6,000,000	G	S02 T04	
3	D001	1,000,000-9,000,000	G	S02 T04	
4	K022	0 - 100,000	G	S02 T04	
5	K048	0 - 100,000	G	S02 T04	
6	K049	0 - 100,000	G	S02 T04	
7	K052	0 - 100,000	G	S02 T04	
8	K086	250,000-1,000,000	G	S02 T04	
9	F001	Included in above		S02 T04	
10	F002	"		S02 T04	
11	F004	"		S02 T04	
12	D005	"		S02 T04	
13	D006	"		S02 T04	
14	D007	"		S02 T04	
15	D008	"		S02 T04	
16	D009	"		S02 T04	
17	K085	"		S02 T04	
18	K095	"		S02 T04	
19	K096	"		S02 T04	
20	U001	"		S02 T04	
21	U002	"		S02 T04	
22	U008	"		S02 T04	
23	U019	"		S02 T04	
24	K046	"		S02 T04	
25					
26					

EPA Form 3510-3 (6-80)

CONTINUE

...a "C" etc. behind the "3" to identify photocopied pages)

...is page before completing if you have more than 26 wastes to list.

Form Approved OMB No. 158-S80004

...MBER (enter from page 1): 5 4 Ø 1 8 2 8 8 — T/A C: 1

FOR OFFICIAL USE ONLY: W DUP — T/A C: 2 DUP

...RIPTION OF HAZARDOUS WASTES (continued)

	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (If a code is not entered in D(1))
1	U153	Included in above		S02 T04	
2	U154	"		S02 T04	
3	U156	"		S02 T04	
4	U159	"		S02 T04	
5	U161	"		S02 T04	
6	U162	"		S02 T04	
7	U165	"		S02 T04	
8	U171	"		S02 T04	
9	U186	"		S02 T04	
10	U210	"		S02 T04	
11	U213	"		S02 T04	
12	U220	"		S02 T04	
13	U226	"		S02 T04	
14	U228	"		S02 T04	
15	U239	"		S02 T04	
16	U070	"		S02 T04	
17	U077	"		S02 T04	
18	U227	"		S02 T04	
19	U003	"		S02 T04	
20	U183	"		S02 T04	
21					
22					
23					
24					
25					
26					

EPA Form 3510-3 (6-80)

CONTINUE C

(... to identify photocopied pages)

Page 2.
Use this page before completing if you have more than 26 wastes to list.

Form Approved OMB No. 158-S80004

NUMBER (enter from page 1)	FOR OFFICIAL USE ONLY	
0 5 4 0 1 8 2 8 8 — T/A C 1	W DUP	T/A C 2 DUP

DESCRIPTION OF HAZARDOUS WASTES (continued)

	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (If a code is not entered in D(1))
1	K044	10,000,000	G	S02	
2	K046	Included in above		S02	
3	K06[illegible]	"		S02	
4	K069	"		S02	
5	F006	"		S02	
6	D004	"		S02	
7	D005	"		S02	
8	D006	"		S02	
9	D007	"		S02	
10	D008	"		S02	
11	D009	"		S02	
12					
13					
14					
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16					
17					
18					10,000 Ta
19					X 2000 #
20					20000,000#
21					
22					
23					
24					
25					
26					

EPA Form 3510-3 (6-80)

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ACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

EPA I.D. NO. (enter from page 1)

M O D 0 5 4 3 8 2 8 8 6

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility *(see instructions for more detail)*.

VI. PHOTOGRAPHS

All existing facilities must include photographs *(aerial or ground—level)* that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas *(see instructions for more detail)*.

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)	LONGITUDE (degrees, minutes, & seconds)
39 40 48 -	91 18 50 -

VIII. FACILITY OWNER

☐ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER	2. PHONE NO. (area code)
CONTINENTAL CEMENT COMPANY, INC.	314-221-1

3. STREET OR P.O. BOX	4. CITY OR TOWN	5. ST.	6. ZIP CODE
P. O. BOX 71	HANNIBAL	MO	63401

IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED
Frank C. Stevens President	Frank C. Stevens	6-28-88

X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED
Fred A. Laiser President, Resource Recovery, Inc.	Fred A. Laiser	6-28-88

CONTINUE ON

CONTRACT FOR SALE OF CHEMICAL COMMODITY

THIS AGREEMENT, made and entered into this 1st day of October, 1987, by and between KEYSTONE STEEL AND WIRE COMPANY of Peoria, Illinois, hereinafter designated as Seller, and CROWN TECHNOLOGY, INC., of Indianapolis, Indiana hereinafter designated as Buyer, WITNESSETH:

In consideration of the acts and payments of the Buyer and upon the terms and conditions set forth, the Seller agrees to sell and convey onto the Buyer's trucks and Buyer agrees to buy the following described chemical commodity:

FERROUS SULFATE HEPTAHYDRATE

(MOIST FORM)

$FeSO_4 \cdot 7H_2O$	=	98% min.
Bulk Density	=	70 to 75 lbs. per cubic foot
Moisture	=	2% to 8%

QUANTITY: It is understood that the quantity and availability of ferrous sulfate shall fluctuate with the Seller's plant production levels. Therefore, the quantity shall be estimated at 10,000 tons per year and further described as 100% of the ferrous sulfate produced by the Seller's plant. The estimated production rate shall be 200 tons per week.

PRICE: Buyer agrees to pay to Seller [redacted] per net ton, f.o.b., Seller's plant. It is understood and agreed, however, that:

1. If, on the first anniversary date of this Agreement or at any subsequent time during the term of the Agreement, Buyer's published retail price for processed ferrous sulfate has or is increased from Buyer's published retail price in effect on the date of this Agreement ([redacted] 00 per ton), then the price paid by Buyer to Seller under this Agreement for Seller's ferrous sulfate shall be immediately increased by the same percentage as Buyer's then current published retail price has increased from the published retail price in effect on the date of this Agreement;

PAYMENT TERMS: Buyer agrees to submit payment for all purchases of ferrous sulfate on a net 30 day basis from invoice date.

TERM AND TERMINATION: The initial term of this Agreement will be five years from the date of the first shipment of ferrous sulfate to the Buyer and shall continue in effect from year to year thereafter unless sooner terminated in the following manner:

After the initial five year period of the Agreement, either party may terminate at any time by giving the other party written notice at least 180 days prior to the effective date of such termination.

MATERIAL QUALITY: Seller agrees to apply normal and acceptable manufacturing practices in the production of the ferrous sulfate to prevent the ferrous sulfate from contamination by foreign matter such as dirt, gravel, chemicals, rain water, scrap metal, etc.

If a shipment of ferrous sulfate is rejected by Buyer due to such contamination, the following conditions shall apply and the following procedures shall be followed:

1. Buyer shall provide written notice to the Seller of said rejection stating specific reasons and analysis of contaminant along with a sample of same.
2. Buyer and Seller shall negotiate the disposition of rejected ferrous sulfate on a case by case basis.

THIS WARRANTY IS EXPRESSLY IN LIEU OF ANY OTHER WARRANTIES, EXPRESSED OR IMPLIED, INCLUDING ANY IMPLIED WARRANTY OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE. The liability of Seller on any claim is limited to refund of purchase price or replacement of defective materials or such combination as Seller may elect. Seller shall not be liable for prospective profits or special, indirect or consequential damages of any kind.

SHIPPING PROCEDURES: It shall be the responsibility of the Buyer to schedule and arrange all transportation of the ferrous sulfate from the Seller's plant. Seller shall provide Buyer with at least a 24-hour notice of availability of a minimum 40,000 pound shipment. Seller must be able to load Buyer's 20-ton tandem dump trucks in such a manner that they are evenly loaded with legal weight distribution. Seller shall require the trucking company to weigh all of their ferrous sulfate shipments before allowing the driver to depart for his destination. Buyer will endeavor to remove each shipment within 48 hours of availability of a full 20-ton load.

Title to the ferrous sulfate and all other incidents of ownership shall pass to Buyer when the loaded trucks leave Seller's plant. Buyer agrees to indemnify and hold Seller harmless from and against any and all loss, damages, suits, liability and expenses (including but not limited to reasonable investigation and legal expenses) arising out of or in any way relating to any use or disposition of the ferrous sulfate purchased from Seller or any violation by Buyer of any applicable statute, rule, regulation or ordinance in connection with such use or disposition.

FORCE MAJEURE CONTINGENCIES: Neither Buyer nor Seller shall be liable to the other for default or delay in the performance of this Agreement if caused, directly or indirectly, by acts of God, war, fire, labor disputes, act of government, when beyond the reasonable control of the affected party. In the event such a force majeure occurs and appears to be only of a temporary duration, performance may be delayed for the duration of the existence of such force majeure. In the event such a force majeure occurs and at the time of occurrence it would appear that it would extend for the duration of this Agreement, then either Buyer or Seller may terminate this Agreement effective upon fifteen days' written notice without further liability hereunder.

IN WITNESS WHEREOF, the parties hereto have caused this Agreement to be executed by the duly authorized officers or representatives as of the day and year first above written.

CROWN TECHNOLOGY, INC.

By: Joseph L. Peterson
Title: President

KEYSTONE STEEL AND WIRE COMPANY

By: Lyle T. Jeffungi
Title: VP, ADMIN. SERV.

GEOSCIENCES RESEARCH ASSOCIATES, INC.

geological, hydrological, geotechnical and environmental consulting

CLOSURE PLAN

Keystone Steel and Wire Company

7000 South West Adams

Peoria, Illinois 61641

June 18, 1986

GEOSCIENCES RESEARCH ASSOCIATES, INC.

627 NORTH MORTON STREET

BLOOMINGTON, INDIANA 47401

RECEIVED

JUL 7 1986

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Appendix A

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Figure 3	Schedule
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Figure 5	Well Completion Diagram
Figure 6	Typical Boring Log
Figure 7	Field Chain of Custody Record
Figure 8	Surface Sediment Sample Locations
Table 1	Summary of Analysis

CLOSURE PLAN

Keystone Steel and Wire Company
7000 South West Adams
Peoria, Illinois 61641
EPA ID NO. ILD 000 714 881

INTRODUCTION

Keystone Steel and Wire Company plans to close its process water receiving ditches, twenty-four hour retention reservoir, and dredge piles. Keystone submits this plan to demonstrate that no environmental impairment has resulted from the practice of discharging acidic water to surface ditches on site. The plan also provides for contingencies in case hazardous materials are encountered during the geologic and hydrologic investigations. The major elements of closure (see Figure 1) are:

1) Plans and specifications for intercepting acid discharges and rerouting directly by pipeline to the waste treatment plant (a summary of the plans is included in Appendix A).
2) Mid Mill Ditch: Receives non-hazardous surface, storm, sump, and cooling water; and acidic water from Mid Mill #3 Cleaning. Drainage goes south by culvert to South Ditch.
3) South Ditch: North part of South Ditch receives surface runoff and acidic water from Main Wire Mill #1 Cleaning and Galvanizing. Acidic water drains to South Ditch through a pipeline and surface drainage ditch. The south part of South Ditch

serves as a sump for Pump House #1. Acidic water and non-hazardous water mix is pumped through a pipeline to the Twenty-four Hour Retention Reservoir.

4) Drainage Ditch: This ditch (see #3 above) carries acidic water from the Main Wire Mill to South Ditch. The drainage ditch is about 250 feet long and is considered a part of the South Ditch.

5) Twenty-four Hour Retention Reservoir: This reservoir is used to hold and partially neutralize acidic water from South Ditch that is mixed with fresh water from the ditch just east of the reservoir. Water is then pumped to the treatment plant where it is further neutralized and discharged to two sedimentation basins.

6) North Ditch: Although no acidic water is discharged directly to North Ditch, the surface water, groundwater, and sediment will be investigated to demonstrate that environmental damage has not occurred.

7) Sludge Piles: Two sludge piles have been created by dredging sediment out of South Ditch (see Figure 1). These piles will be evaluated to determine if they exhibit hazardous characteristics.

The acidic water is spent pickle liquor (K062) discharged with other nonhazardous plant water into existing discharge pipes and then into surface ditches. The acids used in cleaning and

galvanizing processes are sulfuric and hydrochloric. The major metals that may be present in the spent pickle liquor are iron, lead, and zinc. Other metals may be present in much lower concentrations or in trace amounts. The pH of surface water varies depending upon the amount of waste acid discharged and the amount of surface water in the ditch. Although it is possible that on occasion the pH of the discharge could be low, the acidic water should be diluted very quickly by the existing surface water in the ditch, such that the resulting pH would not render the water hazardous. A modified groundwater monitoring plan is proposed as provided in 40CFR 265.90 because (1) water in the ditches is above pH 2, (2) previous analyses of ditch water and sludges have not revealed an overwhelming metal problem, and (3) preliminary, shallow groundwater information very near the ditches has shown that groundwater quality is normal or very near normal (Geosciences, 1986).

NEW DISCHARGE SYSTEM FOR SPENT PICKLE LIQUOR

The designs and specifications for the new, totally enclosed pump and piping system for spent pickle liquor (EPA waste No. K062) have already been submitted for review. In summary, Wire Mill process water and Mid Mill, Cleaning House #3 discharge will be intercepted and diverted to a new holding tank (see Figure 2) and piped directly to the Waste Water Treatment Plant, bypassing the twenty-four hour retention reservoir. Construction of this new system is scheduled for completion by November 1, 1986 (see Figure 3). At that time, all acidic water discharges to surface

ditches will be terminated and the only water received by the ditches will be surface and storm runoff and miscellaneous nonhazardous cooling and process water from the plant.

ENVIRONMENTAL IMPAIRMENT EVALUATION

To evaluate the extent of environmental damage as a result of past discharging of acidic water, the following geologic and hydrologic scope of work is planned:

1) Install 11 monitoring wells (6 shallow and 5 deep, to bedrock or 50 feet) to obtain groundwater samples and monitor water levels.
2) Establish temporary bench marks for surface water level measurements.
3) Monitor surface water and groundwater levels.
4) Perform hydraulic conductivity (permeability) tests in the laboratory and in the field.
5) Analyze groundwater and surface water samples.
6) Analyze surface sediment (sludge) samples.

Monitoring Well Installation:

Ten wells will be installed near North Ditch, Mid Mill Ditch, South Ditch, and the Twenty-four Hour Retention Reservoir; and one well will be installed up gradient (west) of the Reservoir (see Figure 4). The six shallow wells (set near the water table) have already been installed (Geosciences, 1986).

These wells were completed with 2 inch I.D. flush joint stainless steel (316) casing and 5 foot screens (see Figure 5, typical completion diagram).

Five deeper wells (Figure 4) are scheduled for completion in July, 1986. These wells will be completed to 50 feet or shale bedrock, within a few feet of the exisitng shallow wells W-1, W-2, W-3, W-4, and W-5. They will be completed in a similar manner as the shallow wells (Figure 5). The purposes for these deeper wells are to evaluate: 1) groundwater quality at depth near the ditches and twenty-four hour retention reservoir, 2) hydraulic conductivities at depth, and 3) vertical groundwater gradients near the ditches.

The proposed deeper wells will be drilled and set by Central Illinois Drilling Company, or an equally qualified firm. All drilling will be logged by a geologist or hydrologist and samples will be obtained from a split spoon sampler or as grab samples from the hollow stem augers, which will be used to drill all borings. All drilling equipment will be thoroughly cleaned between holes using a steam cleaner or high pressure water cleaner. Split spoon samplers will be cleaned as above and rinsed with organic-free deionized water between samples, and care will be taken to avoid placing any drilling or sampling equipment on the ground surface.

Samples will be described visually in the field and a boring log will be prepared for each monitoring well (see Figure 6, typical boring log). In addition, a Field Log Book with

consecutively numbered pages will be maintained by the field geologist or hydrologist, each page of which will be signed and dated.

Temporary Bench Marks:

Seven temporary bench marks have been installed near monitoring well locations for the purpose of monitoring surface water elevations. The bench marks were set and surveyed by Daily and Associates, Engineers, Inc., Peoria, Illinois. They will also survey the location and elevations of the monitoring wells.

Monitor Surface Water and Groundwater Levels:

Groundwater and surface water levels will be measured monthly in order to evaluate groundwater gradients and the relationship between groundwater and surface water in the vicinity of North Ditch, Mid Mill Ditch, South Ditch, and the Twenty-four Hour Retention Reservoir. Differences in elevation of the water surface in the deep and shallow wells will provide needed information regarding vertical gradients near the ditches. Groundwater levels will be measured with an electric water level sounder, which will be rinsed thoroughly with organic-free deionized water between wells to avoid cross contamination. Date, time, weather conditions, and water levels will be recorded in the Field Log Book and signed by the field geologist or hydrologist.

Hydraulic Conductivities:

Field hydraulic conductivity tests have been performed on the six shallow wells and laboratory tests were performed on two Shelby tube samples. Field pump or slug tests (depending on recovery rates) will be performed on the five deeper wells, which are scheduled for installation in July, 1986. If it is determined that recovery rates are relatively rapid during well development, a low flow pump test will be done. If, on the other hand, recovery rates are slow, either precleaned dedicated bailers will be used to withdraw a known amount of water for the slug test, or a pneumatic method will be used to displace a known amount of water and transducers used to record recovery. Appropriate published methods will be used to evaluate recovery rates.

Groundwater and Surface Water Analysis:

Analyses will be performed on groundwater and surface water samples for one year after the new discharge system has been installed and acidic water is no longer discharged to surface ditches. Groundwater analyses should be started one quarter prior to completion of the new discharge system, just after installation of the deeper monitoring wells (see Figure 3).

Because of the type of waste that has been discharged to the ditches, the following list of parameters have been selected for analysis of surface water:

Chloride	Cadmium
Iron	Chromium
Manganese	Lead
Sodium	Mercury

Sulfate	Selenium
Arsenic	Silver
Barium	pH (field determination)
Zinc	Specific Conductance (field determination)

For groundwater samples, the same parameters as above will be analyzed for, except that total organic carbon (TOC) and total organic halogen (TOH) will also be run. Four replicate analyses will be run on TOC, TOH and the field parameters pH and specific conductance. Groundwater samples for metals will be field filtered with 0.45 um filter paper. Refer to Table 1 for a summary of analyses, bottles to be used, preservation, blanks, replicates, and holding times. Samples will be obtained from the eleven monitoring wells with laboratory cleaned, dedicated teflon bailers, to avoid field decontamination procedures and possible cross contamination. The two, deep Keystone water wells will also be sampled (see Figure 4).

Surface water and groundwater samples will have preservatives added in the field, placed on ice, and delivered to Daily Laboratories within 24 hours. All bottles will be precleaned and provided by the analytical laboratory. A trip blank will be provided by the laboratory as a check on bottle cleaning methods. Proper chain of custody procedures will be followed at all times (see Figure 7, chain of custody form).

The first full round of groundwater and surface water samples after the new discharge system is in use will be run for the full list of parameters above. Depending on the results of this first round of samples, the remaining quarterly samples may have the parameter list reduced. The reduction in parameters would be agreed upon by Keystone, U.S. EPA, and Illinois EPA.

Surface Sediment Sampling:

Eleven surface sediment (sludge) samples will be collected after the new discharge system has been constructed and acidic water discharge to the ditches has been stopped. The first round of samples will be analyzed for the following list of parameters:

Iron	Chromium
Manganese	Lead
Sodium	Mercury
Arsenic	Selenium
Barium	Silver
Zinc	Paste pH
Cadmium	EP Tox

Depending on the results of the first round of samples, the parameter list may be reduced or eliminated for the remaining quarters, as mutually agreed upon by Keystone, U.S. EPA, and Illinois EPA.

The locations for the proposed eleven samples are shown on Figure 8. Each sample will be a composite of five randomly selected samples. Samples will be collected with dedicated, laboratory cleaned stainless steel spoons and bowls, thoroughly mixed, transferred to a one liter glass jar with teflon lined lid (as provided by the analytical laboratory), and sent to the lab on ice within 24 hours. Chain of custody forms (Figure 7) will be maintained.

North Ditch, Mid Mill Ditch, South Ditch, and the Twenty-four Hour Retention Reservoir will be divided in half and sampled separately (Figure 8). The surface Drainage Ditch and the two Dredge Piles will also be sampled separately. The results of the

analyses will be used to determine whether or not the ditch sediments exhibit hazardous characteristics or contain hazardous constituents.

ANALYTICAL PROCEDURES

All sampling and analytical methods will follow those outlined in SW 846, including chain of custody and QA/QC requirements. Daily Analytical Laboratories, Peoria, Illinois has tentatively been selected to perform all laboratory analytical work (pending U.S. EPA and Illinois EPA approval).

REMEDIAL ACTIONS AND CLOSURE

Based on the results of the groundwater, surface water and sediment analyses, remedial action alternatives will be evaluated to determine the most economically feasible method to close the surface ditches and twenty-four hour retention reservoir in an environmentally acceptable manner. The alternatives that will be evaluated may include, but are not limited to, the following:

1) No action.
2) In place neutralization of low pH water and sediment in ditches and reservoir.
3) Remove hazardous materials to an approved landfill, resample sediment and water to assure hazardous materials are removed.

4) Stabilize hazardous constituents, in place, such that they are not mobile, resample sediment and water to assure hazardous constituents are immobile.

The remedial action investigation will begin (see Figure 3) after the results for the first round of quarterly samples have been received. Depending on the results, the investigation, remedial design and implementation may require one week or two months. Regardless of which action is finally selected, it would be mutually agreed upon by Keystone, U.S. EPA, and Illinois EPA.

CERTIFICATION OF CLOSURE

When closure is completed, Keystone will provide certification that all areas have been closed in accordance with the plans and specifications contained in the approved Remedial Action Designs (Closure Plan). An independent professional engineer registered in Illinois will be retained by Keystone to review all data, remedial action designs, the implementation of remedial actions, and to certify that the areas have been closed in accordance with the approved remedial action specifications.

COST ESTIMATE FOR WORK ON FIGURE 3 SCHEDULE

The following costs assume that the parameter list as shown on Table 1 (with no additions or subtractions of parameters) will be used through August, 1987 as shown on Figure 3 Schedule, and that five additional monitoring wells will be installed, pump tested and sampled through August, 1987. Estimated costs for the

design and implementation of the remedial action are not included, since it is impossible to determine the required action until field studies have been completed. Estimates will be revised after the Remedial Alternatives Report has been completed.

Preliminary studies conducted prior to June 1, 1986:		
Drilling and installation of monitoring wells, slug tests, analytical, and preliminary report.		
	$ 32,000	
	Subtotal	$ 32,000
Design and construction of new piping system:		
	645,000	
	Subtotal	645,000
Install five deep (50') monitoring wells:		
(estimates valid for 90 days)		
Drilling and well completion	29,350	
Log cuttings and supervise drilling	5,500	
Develope wells	450	
Field surveying	900	
	Subtotal	36,200
Monitoring well, water level measurements:		
Monthly monitoring through August 1987		
	6,500	
	Subtotal	6,500

Groundwater, surface water, and surface sediment sampling:		
Five routine sampling trips	9,750	
Sampling equipment rental	470	
	Subtotal	10,220
Field slug tests or pump tests:		
Five new wells	2,100	
Equipment rental and office expenses	300	
	Subtotal	2,400
Analytical (Laboratory and field):		
Groundwater	30,850	
Surface water	6,130	
Surface sediment	19,220	
	Subtotal	56,200
Assess remedial alternatives and prepare report:		
Labor	10,400	
Office expenses	400	
	Subtotal	10,800
Final geohydrologic report:		
Labor	8,560	
Office expenses	640	
	Subtotal	9,200
Project Management:		
Through August 1987	10,400	
	Subtotal	10,400

Independent engineer inspections and certifications:

Review all data, reports, designs and construction	30,000	
	Subtotal	30,000
Total Estimated Cost		$848,920

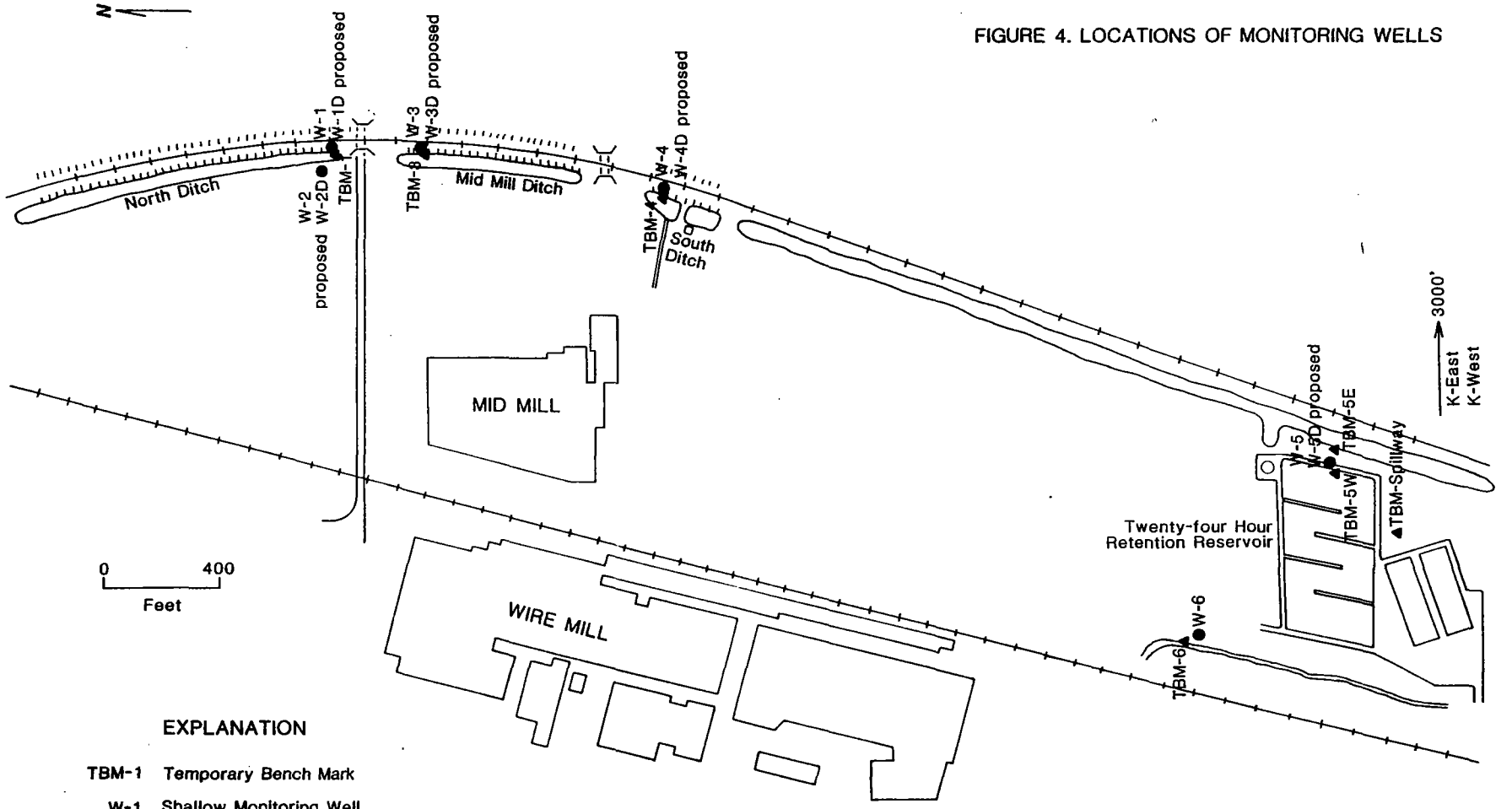
NOTE: The total estimated cost will be revised after the Remedial Alternative Assessment is completed and an appropriate action selected.

REFERENCES

Geosciences, 1986, Field and Laboratory Studies, Keystone Steel and Wire Company, Peoria, Illinois

KEYSTONE STEEL & WIRE COMPANY

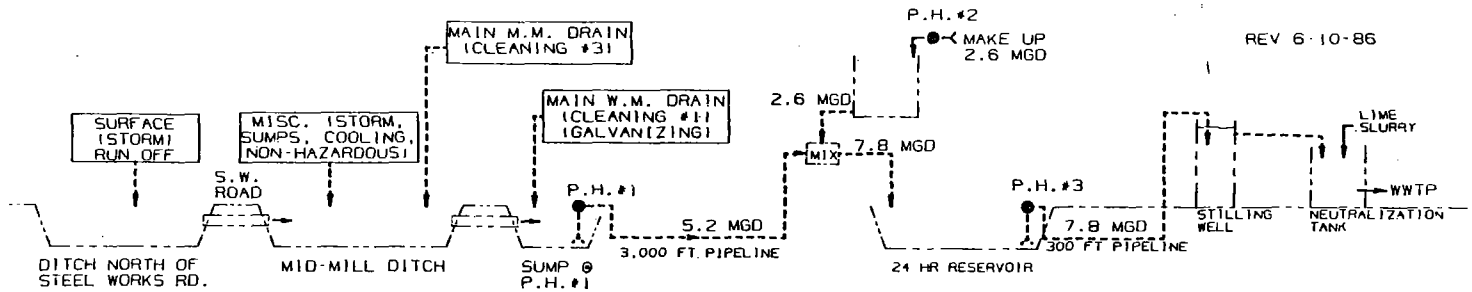
FIGURE 4. LOCATIONS OF MONITORING WELLS



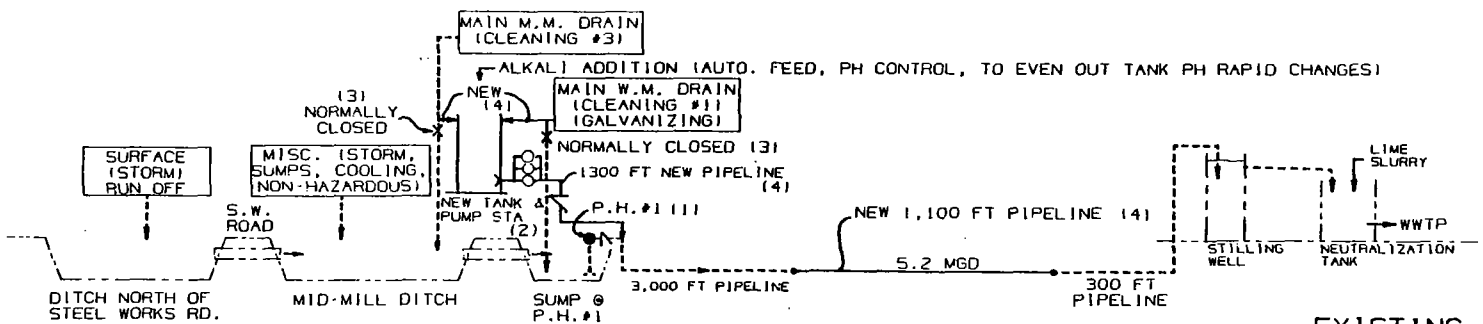
EXPLANATION

TBM-1	Temporary Bench Mark
W-1	Shallow Monitoring Well
W-1D	Proposed Deep Monitoring Well
K-East	Keystone Water Supply Well

Geosciences Research Associates, Inc.
627 North Morton Street
Bloomington, Indiana 47401



EXISTING WATER SYSTEM @ WM/MM

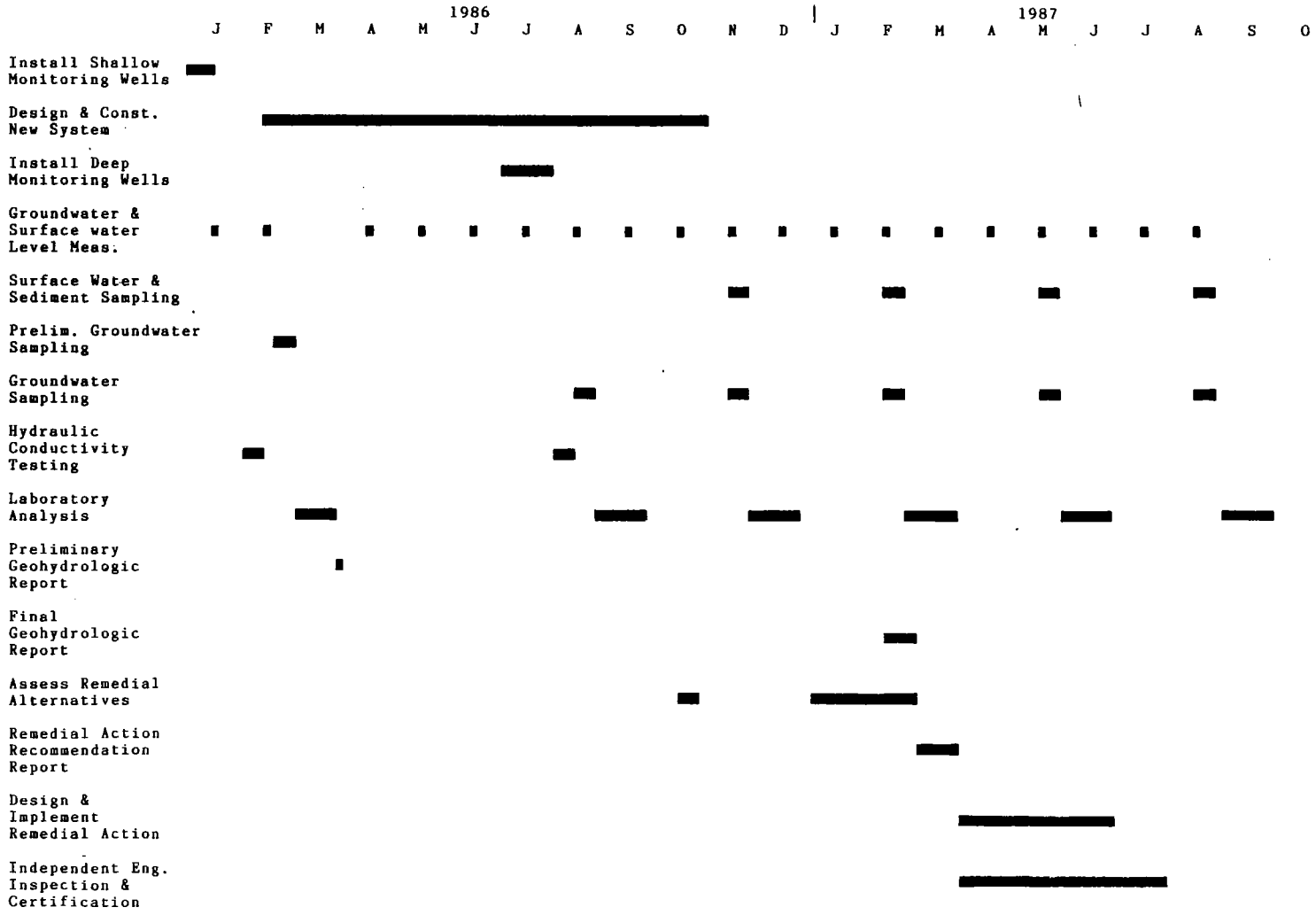


PROPOSED WATER SYSTEM @ WM/MM

(4) PVC OR FRP CORR. RESIST. PIPE
(3) VALVES NORMALLY CLOSED, ONLY OPEN AFTER GALV. & CLEANING OPERATIONS CEASE IN EVENT OF PUMP FAILURE (FULL TANK)
(2) NEW PUMP STA WILL RUN 1 PUMP CONT. (2-3000 GPM VARIABLE SPEED, LEVEL CONTROL ON PUMP SPEED)
(1) PH1 WILL RUN ABOUT 6-8 HRS DAY, 1 PUMP @ 2500 GPM

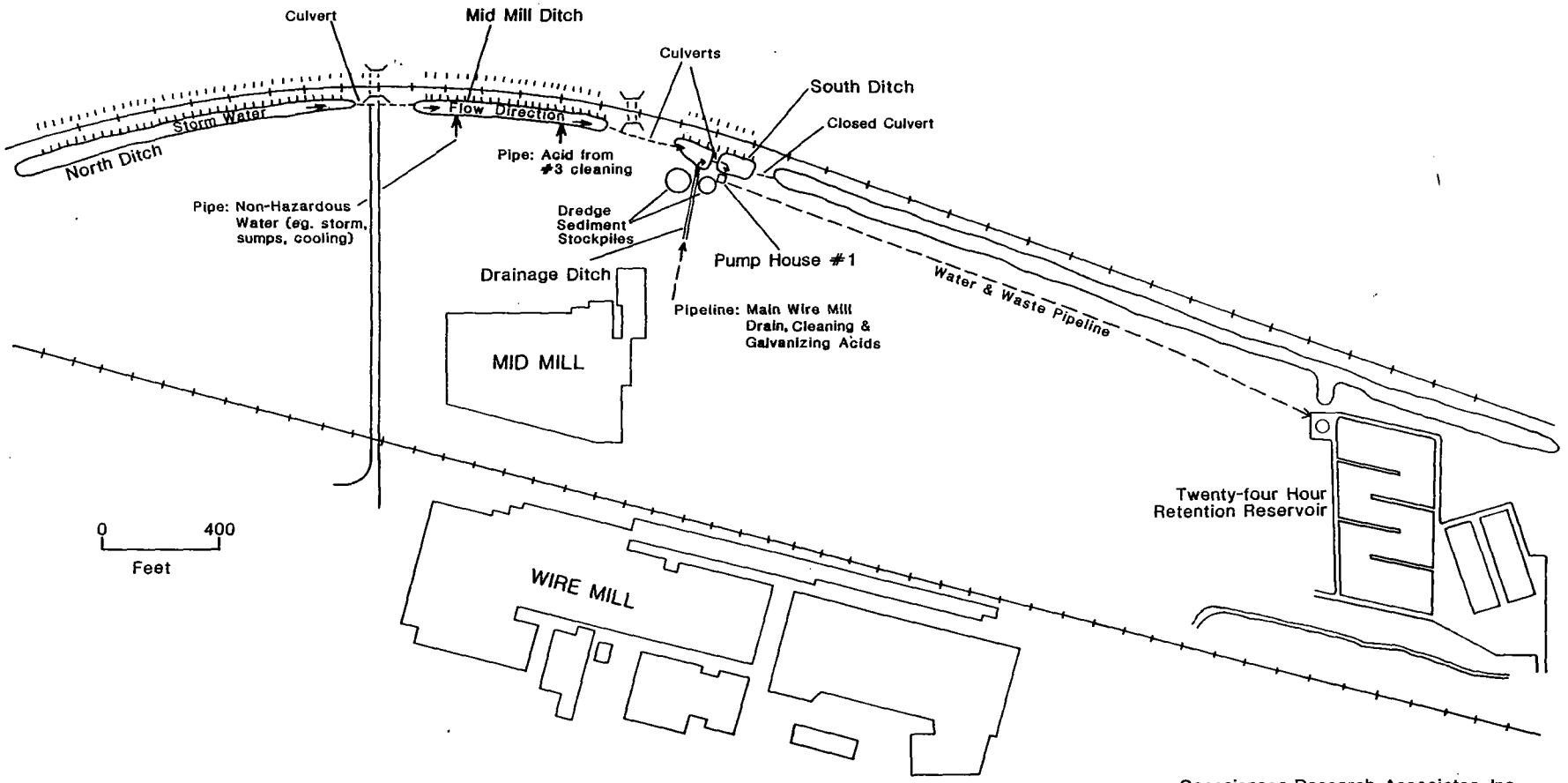
FIGURE 2. PROPOSED DISCHARGE SYSTEM

FIGURE 3. SCHEDULE



KEYSTONE STEEL & WIRE COMPANY

FIGURE 1. SITE MAP



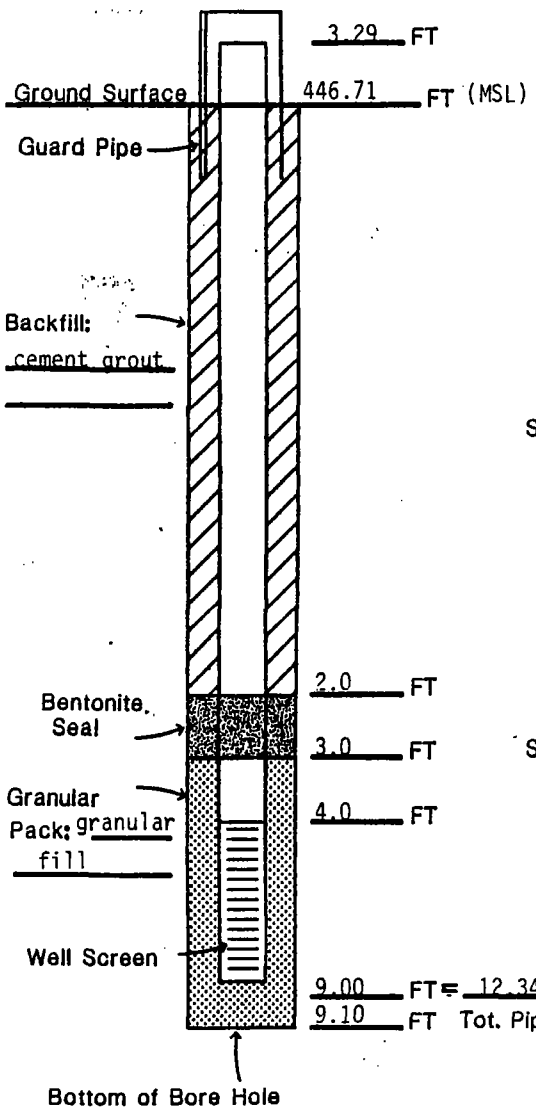
Geosciences Research Associates, Inc.
627 North Morton Street
Bloomington, Indiana 47401

GEOSCIENCES RESEARCH ASSOCIATES, INC.
geological, hydrological, geotechnical and environmental consulting

627 N. Morton Street
Bloomington, Indiana 47401 812-336-0972

TOTAL TIME = 2 hours 50 min.

FIGURE 5.
WELL COMPLETION DIAGRAM



Project: Keystone Steel & Wire

Well No: 3

Time & Date Started: 2:10 pm, 1-16-86

Time & Date Completed: 5:00 pm, 1-16-86

SCREEN:
Type Stainless Steel (316)
Slot Size .006
Top Blank 0.14'
Bottom Blk. 0.05'
Total Scr. 5.00'
Tot.Length 5.19'

STAND PIPE:
Type Stainless Steel
Length 7.20'

9.00 FT = 12.34 − 0.00 − 0.05 − 3.29
9.10 FT Tot. Pipe Cut Off Bot. Blk. Stick

NOT TO SCALE

FIGURE 6. TYPICAL BORING LOG

Company: Keystone Steel & Wire — Geosciences Research Associates, Inc.

Driller: Central Illinois Drilling Company — Boring: W3 — Sheet 1 of 1

Geologist: Scott McCready — Date: 1-16-86 — Ground Elevation: 446.71 ft.

Depth (feet)	Graphic Log	Sample Type		Lithology, Description, and Remarks
		GB-1		FILL, silt, clayey, few fine gravel, dark brown, slightly moist, rooted, plant debris, very slightly sandy
		GB-2		FILL, silt, clayey, few fine gravel, brown, slightly moist, rooted, very slightly sandy
2		GB-3		SILT, clayey, few fine gravel, brown - dark brown, very slightly sandy, slightly moist
		GB-4		SILT, clayey, few fine gravel, brown, very slightly sandy, slightly moist
4		GB-5		SILT, clayey, few fine gravel, brown - dark brown, very slightly sandy, slightly moist
		GB-6		SILT, clayey, few fine gravel, brown, very slightly sandy, slightly moist
6		GB-7		SILT, clayey, very slightly sandy, slightly moist - moist
		GB-8		SILT, clayey, few fine - medium gravel, brown, very slightly sandy, slightly moist - moist
8		GB-9		SILT, clayey, few fine gravel, brown, very slightly sandy, slightly moist - moist
				Total depth 9.1
10				

FIGURE 7.
FIELD CHAIN OF CUSTODY RECORD

GEOSCIENCES RESEARCH ASSOCIATES, INC.
627 NORTH MORTON STREET
BLOOMINGTON, INDIANA 47401

SAMPLE TAG NO. _____ LAB RECORD NO. _____

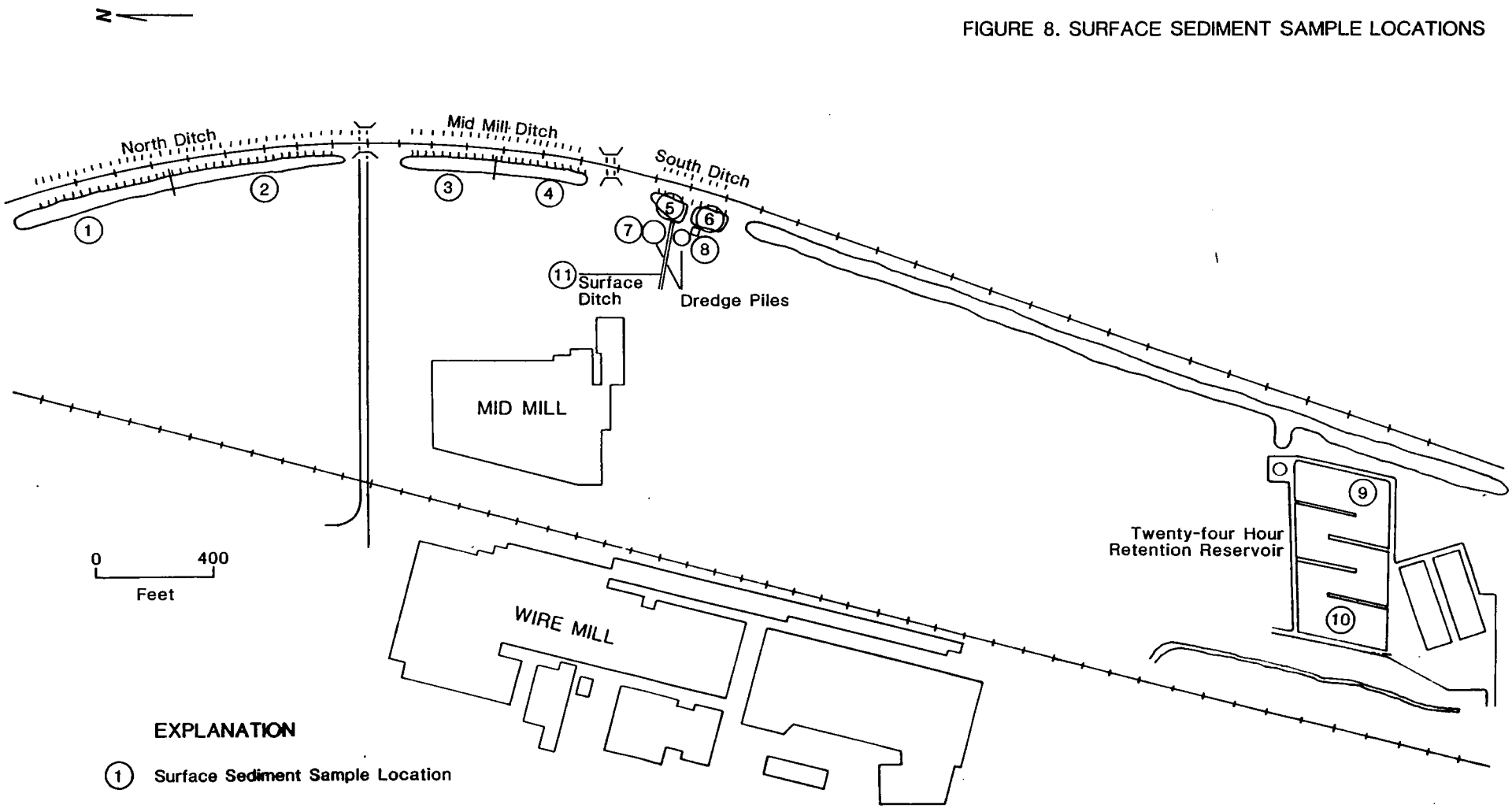
PROJECT NO.	PROJECT NAME
SAMPLERS	

SAMPLE NO.	DATE	TIME	COMP.	GRAB	SAMPLE LOCATION	NO. CONTAINERS						REMARKS

Relinquished by:	Date	Time	Received by:	Relinquished by:	Date	Time	Received by:
Relinquished by:	Date	Time	Received by:	Relinquished by:	Date	Time	Received by:
Relinquished by:	Date	Time	Received for Laboratory by:	Date	Time	Remarks	

KEYSTONE STEEL & WIRE COMPANY

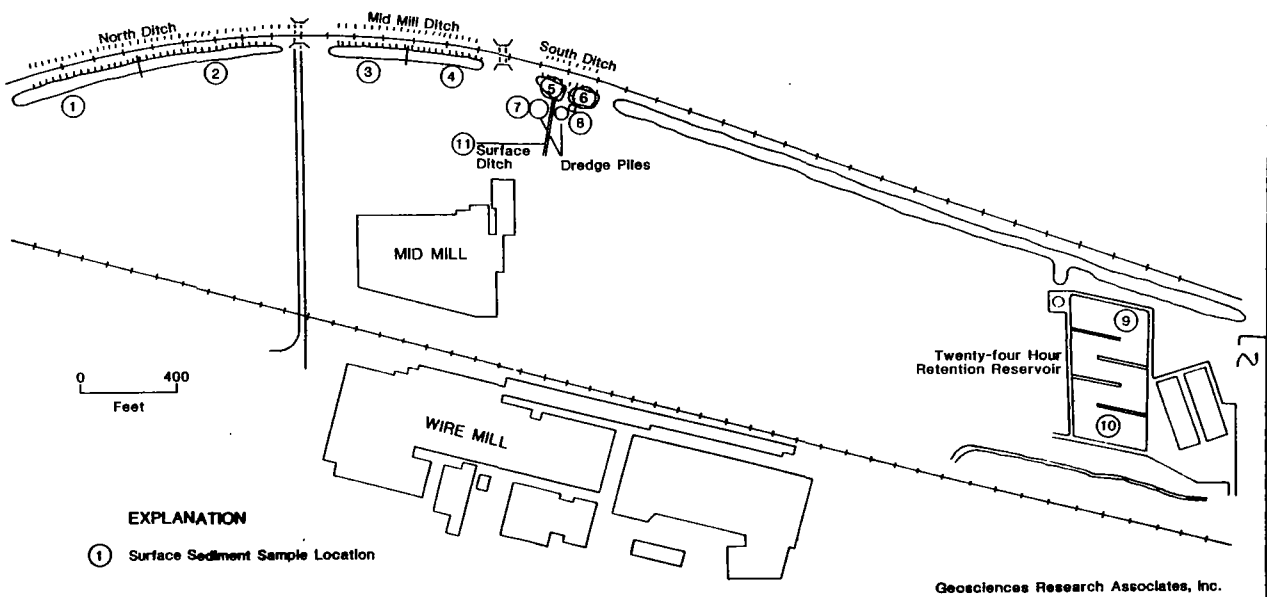
FIGURE 8. SURFACE SEDIMENT SAMPLE LOCATIONS



Geosciences Research Associates, Inc.
627 North Morton Street
Bloomington, Indiana 47401

KEYSTONE STEEL & WIRE COMPANY

FIGURE 8. SURFACE SEDIMENT SAMPLE LOCATIONS



EXPLANATION

(1) Surface Sediment Sample Location

Geosciences Research Associates, Inc.
627 North Morton Street
Bloomington, Indiana 47401

TABLE 1 SUMMARY OF ANALYSES

Type of Analysis	Parameters	No. Samples/ Trip	Type of Bottle	No. Bottles	Preservation	Holding Time	No. Blanks	No. Replicates	Comments
Groundwater	iron, manganese sodium, arsenic, barium, zinc, cadmium, chromium, lead, mercury, selenium, silver	13	1 liter glass, poly seal lid, or 1 liter HDPE	1/sample	HNO_3 to pH<2 cool to 4°C	6 months, except mercury (28 days)	1	1	Filtered with 0.45 µm
	chloride, sulfate	13	1 liter HDPE	1/sample	cool to 4°C	28 days	1	1	
	pH, specific conductance	13	N/A	N/A	None	Field Determination	1	1	
	TOC	13	250 ml Polyethylene	1/sample	H_2SO_4 to pH<2 cool to 4°C	28 days	1	1	
	TOX	13	1 liter amber glass, teflon lined lid	1/sample	cool to 4°C	7 days	1	1	
Surface Water	iron, manganese, sodium, arsenic, barium, zinc, cadmium, chromium, lead, mercury, selenium, silver	5	1 liter glass, teflon lined lid, or 1 liter HDPE	1/sample	HNO_3 to pH<2 cool to 4°C	6 months, except mercury (28 days	1 method 1 control	1	
	chloride, sulfate	5	1 liter HDPE	1/sample	cool to 4°C	28 days	1 method 1 control	1	

TABLE 1 SUMMARY OF ANALYSES

CONTINUED

Type of Analysis	Parameters	No. Samples/ Trip	Type of Bottle	No. Bottles	Preservation	Holding Time	No. Blanks	No. Replicates	Comments
Surface Water Continued	pH, specific conductance	5	N/A	N/A	None	Field Determination	1 method 1 control	1	
Surface Sediment (sludge)	iron, manganese, sodium, arsenic, barium, zinc, cadmium, chromium, lead, mercury, selenium, silver, paste pH, and EP Tox metals	11	1 liter glass, teflon lined lid	1/sample	cool to 4°C	6 months (we specify 7 days for paste pH)	1 method 1 control	1	

APPENDIX A - CLOSURE PLAN

TECHNICAL SUMMARY - KEYSTONE PROCESS WATER HANDLING IMPROVEMENTS

1. General - All acidic waste waters will be intercepted and diverted to a holding tank and pumped to the Waste Water Treatment Plant (WWTP) in a totally enclosed system. This will eliminate the contact of acidic waste waters with the existing ditches and surface impoundment (24 hour reservoir).

   The existing ditch system will continue to be used to collect miscellaneous (storm, cooling, process, ground) non-hazardous waste waters. The 24 hour reservoir will be bypassed and not used. This surface impoundment can then be abandoned and closed. Refer to Figure 2 in the Closure Plan for a schematic description of water flow.

2. Design Summary

   A. Cleaning #1 & Galvanizing - These processes generate all of the acidic waste waters discharged into the Wire Mill drain. They presently tie into the Main Wire Mill drain which also contains miscellaneous non-hazardous cooling and process water. This drain will be intercepted with the flow diverted to a 500,000 gallon concrete tank described in 2.C.

B. Cleaning #3 - This process generates the remaining portion of the acidic waste water now discharged to the ditch through the Mid Mill drain. This drain will also be intercepted and the flow diverted to the same 500,000 gallon tank as above.

C. 500,000 Gallon Tank - The tank is of reinforced concrete design and is lined with coal tar epoxy. The tank will be located under roof in the Mid Mill area of the plant. With a normal flow rate of 2,500 gallons per minute, the tank has over 2 hours of holding capactiy in the event of power or pump failure.

D. New Pumping Station - This new pumping station is located at the 500,000 gallon tank area. It is designed to pump water out of the tank at a variable flow rate to maintain tank level. The pump station consist of 3 variable speed pumps. Each pump has the capacity to pump in excess of 2,500 GPM.

E. New Piping System - A new pipeline, approximately 1,300 feet long, will transfer the water from the tank into an existing pipeline running between existing Pump House #1 and Pump House #2. At Pump House #2, a new pipeline approximately 1,100 feet long will transfer the water between Pump House #2 and Pump House #3.

This arrangement bypasses the 24 hour reservoir and allows it to be removed from the waste water collection system. At Pump House #3, an existing pipeline transfers the water to the WWTP neutralization tank.

F. Alkali Addition System - It is necessary to provide partially neutralized plant waste water to the WWTP for proper operation of the existing waste water treatment system. This will be done by injecting liquid caustic into the plant waste water as it enters the 500,000 gallon tank previously described. Variable speed caustic pumps automatically controlled will enable the PH of the tank water to be maintained at the predetermined setpoint.

Presently, Pump House #2 mixes WWTP effluent water with plant waste water (pumped from Pump House #1) and deposits it in the 24 Hour Reservoir. Since the new Alkali Addition system will accomplish this partial neutralization function, both Pump Houses (2 & 3) and the 24 hour reservoir can be abandoned and closed.

G. System Alarm & Control - The system is designed for both manual and automatic control. Pump speed will have both local and remote (at WWTP) control capability.

Automatic local and remote alarms on tank levels and pump performance will allow continual monitoring of the system.

Would seem to require a Part B.

In the event of system failure, waste acid discharges will cease and all plant waters will then diverted to the existing ditch system. Existing Pump House #1 is used to remove water from the existing ditch system. Normally, Pump House #1 will run approximately 8 hours per day to remove non-hazardous (cooling, ground, storm and process) water continually flowing to the ditch.

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Keystone Steel & Wire

July 2, 1986

Ms. Janet Virgilio
Permit Section
Division of Land
Pollution Control
Illinois Environmental
Protection Agency
2200 Churchill Road
Springfield, IL 62706

Re: Letter from the Chief Financial Officer to Demonstrate Liability Coverage and Assurance of Closure

Dear Ms. Virgilio:

I am the chief financial officer of the Keystone Steel & Wire Division of Keystone Consolidated Industries, Inc., 7000 S.W. Adams Street, Peoria, Illinois 61641. This letter is in support of this firm's use of the financial test to demonstrate financial assurance, as specified in Subpart H of 40 CFR Parts 264 and 265.

1. This firm is the owner or operator of the following facilities for which financial assurance for closure or post-closure care is demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by the test are shown for each facility:

EPA Identification Number: ILD000714881
Keystone Steel & Wire Division of
Keystone Consolidated Industries, Inc.
7000 S.W. Adams Street
Peoria, Illinois 61641
Current closure cost estimates: $848,920

2. This firm guarantees, through the corporate guarantee specified in Subpart H of 40 CFR Parts 264 and 265, the closure or post-closure care of the following facilities owned or operated by subsidiaries of this firm. The current cost estimates for the closure or post-closure care so guaranteed are shown for each facility:

Peoria facility: $848,920

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IEPA-DLPC

Keystone Steel & Wire Co. 7000 S.W. Adams St. Peoria, IL 61641 (309) 697-7020 TWX 910-652-0135

3. In States where EPA is not administering the financial requirements of Subpart H of 40 CFR Parts 264 and 265, this firm, as owner or operator or guarantor, is demonstrating financial assurance for the closure or post-closure care of the following facilities through the use of a test equivalent or substantially equivalent to the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by such a test are shown for each facility: None.

4. This firm is the owner or operator of the following hazardous waste management facilities for which financial assurance for closure or, if a disposal facility, post-closure care, is not demonstrated either to EPA or a State through the financial test or any other financial assurance mechanism specified in Subpart H of 40 CFR Parts 264 and 265 or equivalent or substantially equivalent State mechanisms. The current closure and/or post-closure cost estimates not covered by such financial assurance are shown for each facility: None.

This firm is not required to file a Form 10K with the Securities and Exchange Commission (SEC) for the latest fiscal year.

The fiscal year of this firm ends on June 30. The figures for the following items marked with an asterisk are derived from this firm's independently audited, year-end financial statements for the latest completed fiscal year, ended June 30, 1985.

ALTERNATIVE I

1.	Sum of current closure and post-closure cost estimates (total of all cost estimates shown in the four paragraphs above)	$ 848,920
*2.	Total liabilities (if any portion of the closure or post-closure cost estimates is included in total liabilities, you may deduct the amount of that portion from this line and add that amount to lines 3 and 4)	$54,551,000
*3.	Tangible net worth	$27,208,000
*4.	Net worth	$27,208,000
*5.	Current assets	$45,637,000
*6.	Current liabilities	$26,589,000
7.	Net working capital (line 5 minus line 6)	$19,048,000

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JUL -7 1986

*8.	The sum of net income plus depreciation, depletion, and amortization	$ 4,540,000	
*9.	Total assets in U.S. (required only if less than 90% of firm's assets are located in the U.S.)		N/A
10.	Is line 3 at least $10 million?	Yes	
11.	Is line 3 at least 6 times line 1?	Yes	
12.	Is line 7 at least 6 times line 1?	Yes	
*13.	Are at least 90% of firm's assets located in the U.S.? If not, complete line 14.	Yes	
14.	Is line 9 at least 6 times line 1?	N/A	
15.	Is line 2 divided by line 4 less than 2.0?		No
16.	Is line 8 divided by line 2 greater than 0.1?		No
17.	Is line 5 divided by line 6 greater than 1.5?	Yes	

I hereby certify that the wording of this letter is identical to the wording specified in 40 CFR 264.151(f) as such regulations were constituted on the date shown immediately below.

L. L. Whitler
Vice President-Sales & Finance
Keystone Steel & Wire Division
of Keystone Consolidated
Industries, Inc.

July 2, 1986

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JUL 7 1986

Coopers
&Lybrand

certified public accountants

The Board of Directors
Keystone Consolidated Industries, Inc.:

We compared the data below, which was taken from the attached letter from L. L. Whitler, to the corresponding data for Keystone Steel & Wire Division included in the audited consolidated financial statements of Keystone Consolidated Industries, Inc. and Subsidiaries for the year ended June 30, 1985, and found such data to be in agreement.

Tangible net worth	$27,208,000
Net worth	27,208,000
Current assets	45,637,000
Current liabilities	26,589,000
The sum of net income plus depreciation, depletion and amortization	4,540,000

Because the above procedure does not constitute an examination made in accordance with generally accepted auditing standards, we do not express an opinion on the above data. In connection with the procedure referred to above, no matters came to our attention which caused us to believe the specified data should be adjusted. Had we performed additional procedures, matters might have come to our attention that would have been reported to you. This report relates only to the data specified above and does not extend to any financial statements of the Division and Corporation, taken as a whole.

This report is intended solely for the use of management in preparing its filings to various administrators of the Illinois and United States Environmental Protection Agencies and is not to be used for any other purpose.

Coopers & Lybrand

Dallas, Texas
July 2, 1986

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JUL 7 1986

Closure 251 P594559684 & 685 file

Illinois Environmental Protection Agency · 2200 Churchill Road, Springfield, IL 62706

217/782-6762

Date Received: July 7, 1986
Log #C-251

Refer to: 1430050001 -- Peoria County
Keystone Steel & Wire Company
ILD000071488I
LPC Closure

September 29, 1986

Kirkland & Ellis
Attn: Andrew R. Running
200 East Randolph Drive
Chicago, Illinois 60601

Keystone Steel & Wire Co.
7000 South West Adams
Peoria, Illinois 61641

Gentlemen:

The document you submitted as a closure plan, dated July 3, 1986, and received by this Agency on July 7, 1986 has been determined to be incomplete and therefore has been deemed not filed. This determination is based on deficiencies and omissions of the following items.

1. DESCRIPTION OF THE FACILITY - The plan should describe the type of industry, Standard Industrial Code (SIC Code), products, location, size and other general, summarized information. This does not have to be an extensive description.

2. DESCRIPTION OF THE WASTE MANAGEMENT UNITS TO BE CLOSED - Describe each unit which is to be closed and provide the process code and unit of measure code from the Part A (i.e., S01-1000 gal.). Include waste types for each unit (by standard chemical name and U.S. EPA code), time period of use, dimensions, topography, soil types (as appropriate), and any other relevant matters. Identify these units by reference to line numbers on the Part A application. Plans for complete closure must address all units on the Part A application. A copy of the following documents should be included in the closure plan:

   - the original Part A application (EPA Forms 3510-1 and 3510-3);
   - any revised Part A with proof of approval by USEPA or IEPA.

   If this is a partial closure (some units will remain active), include a request for modification of your Part A in the closure plan. This modification will be made after closure is certified by the IEPA.

3. MAP OF FACILITY - The location of the facility on a topographic or county map should be provided. Map scale should be specified.

4. DETAILED DRAWING OF THE UNIT(S) TO BE CLOSED - Submit a plan view of the unit(s), showing dimensions, appurtenant structures and relationship to other points or structures on the facility property, at a minimum. The scale of the drawing should be specified.

5. LIST OF HAZARDOUS WASTE - Provide a complete, detailed list of hazardous wastes (chemical name and EPA hazardous waste number) treated, stored or disposed at each unit. Trade names or common names should not be used when generic chemical names are available. Provide the maximum inventory of wastes treated, stored or disposed at each unit.

6. SCHEDULE FOR CLOSURE - 35 IAC 725.213 requires the owner/operator to treat, remove or dispose of all hazardous waste in accordance with the approved closure plan within 90 days after receiving the final volume of hazardous wastes or 90 days after approval of the closure plan by the IEPA. The owner/operator must complete all closure activities in accordance with the approved closure plan and within 180 days after receiving the final volume of wastes or 180 days after approval of the closure plan, if that is later.

   Closures requiring time periods longer than the above, including extensions after the closure plan approval, must be reviewed and approved by the IEPA (refer to 725.213).

   The plan should contain a timetable which shows all critical dates for activities closure, including waste removal, sampling, soil removal, critical when the independent engineer or his representative will be present, backfilling, independent engineer's certification, and other relevant activities. This timetable should generally start at the date of approval or some other definable date (i.e., award of contract, etc.), and not rely on calendar dates.

7. DECONTAMINATION DESCRIPTION (35 IAC 725.214) - The owner/operator should describe all efforts to clean or decontaminate hazardous waste and its residues and constituents from tanks, paved areas, concrete, pipes, pumps, sumps and any other appurtenances to the hazardous waste management unit. The owner/operator may be requested to use any reasonable means to clean or decontaminate, including solvent washing, pressure washing, scraping or other means. A description of how waste material (rinse water, etc.) from decontamination will be managed should also be provided. Please note that residue from listed hazardous waste must be managed as a hazardous waste unless it is delisted under the provisions of 40 CFR 260.20 and 260.22.

8. PROPOSAL OF CLEANUP LEVELS FOR SOIL (35 IAC 725.211) - For disposal units and any areas contaminated with hazardous wastes or hazardous waste constituents, provide the proposed cleanup levels and justification for same.

9. SAMPLING PLAN AND ANALYTICAL METHOD(S) DESCRIPTION (35 IAC 725.211) - Closures of units where there is any evidence of leaks or spills or potential for hazardous waste constituent (Appendix VIII) migration must include sampling of soil to determine the nature and extent of contamination of soil. Soil sampling should also be provided for container storage areas which are founded on soil or gravel or on concrete pads without curbs. All samples which are to be taken must be handled in accordance with 40 CFR, Part 261, Appendix III.

   An adequate soil sampling and analysis plan should include the following:

   a. parameters to be analyzed

   b. locations of samples (horizontal location and depth)

   c. background samples (when applicable)

   d. sampling methods and equipment

   e. analytical methods

   f. evidence of a quality assurance/quality control plan for laboratory analyses

   g. a clear statement of the proposed "clean" level for soil

10. CLOSURE OF DISPOSAL UNITS - The closure of a hazardous waste management unit with waste left in place requires final cover in accordance with 35 Ill. Adm. Code, Section 725.410 and groundwater monitoring per Section 725.217.

11. DESCRIPTION OF CONTAMINATED SOIL REMOVAL - Any facility which is attempting to close "clean" must fully describe each step in removing waste and contaminated soil from the property. This includes a description of solidification/stabilization, stockpiling of waste or reagents, equipment, removal pattern and depth increments, loading areas or any other steps critical to removal. The plan should clearly define how soil will be removed, stored, loaded and managed once it leaves the property.

12. DESCRIPTION OF EQUIPMENT CLEANING - Any equipment, including heavy earth-movers or smaller tools, should be scraped and washed to remove waste residues. The residues should be managed as hazardous waste, and this cleaning and management should be described in the closure plan.

13. CERTIFICATION STATEMENT - All partial or full closures of hazardous waste management units must be certified by both the owner/operator and an independent registered professional engineer (725.215). The closure plan must include a statement acknowledging this requirement. Certification is due 30 days after completion of closure and no more than 210 days from the date of closure plan approval (unless otherwise approved).

    The independent engineer should be present during all major closure activities. These might include soil sampling, soil removal, backfilling, final cover placement, etc. The frequency of inspections by the independent engineer must be sufficient to determine the adequacy of each critical activity.

14. STATEMENT OF FACILITY STATUS AFTER CLOSURE - The closure plan should clearly state the status of the hazardous waste facility after closure is completed. For example, it should state if a storage facility is to be operated as a generator (less-than-90-day storage), and it should describe whether closure is partial or complete. If partial, it should name both the units covered by the closure plan as well as those remaining in operation. It should indicate whether the facility will continue to be a generator and transporter (if applicable).

    Indicate which of the following categories describes the intended use of the facility:

    a. No treatment, storage or disposal will occur at this facility.

    b. Disposal will continue at this facility.

    c. This facility will continue to treat hazardous wastes.

    d. Less than 1,000 kg/month will be generated, and storage will be for less than 90 days.

    e. The facility will generate and store more than 1,000 kg/month for less than 90 days.

    f. The facility will generate and store more than 1,000 kg/month for more than 90 days.

    g. The facility will generate and store more than 100 kg/month, but less than 1,000 kg/month for less than 180 days (270 days if applicable).

h. The facility will be exempt from treatment storage and disposal (TSD) regulation under RCRA.

i. The facility will be a transporter of hazardous waste.

15. POST-CLOSURE CARE PLAN - The closure plan for any disposal unit (hazardous waste left in the unit) must include an interim status post-closure plan in accordance with the requirements of Part 725. Owner and operators of waste management units which close after January 26, 1983 are required to submit an application for a Post-Closure Permit upon request from the EPA (40 CFR 270.1(b) and (c)).

16. LOCATION DOCUMENTATION FOR LAND DISPOSAL UNITS - 35 IAC Sections 725.219 and 725.220 describe the survey plat and notice in deed requirements for owner and operator which are closing disposal units. Note that a copy of the survey plat, showing the location and dimensions of disposal areas, must be provided to the Director within 90 days of closure.

In addition to the deficiencies of the closure plan itemized above, it has been determined that the requirements of 35 IAC, Subpart H have not been met for the following reasons.

1. COST ESTIMATES - The following problems were noted with the cost estimates:

   a. The cost of construction and design of the new piping system should not be included as a cost of closure.

   b. A cost estimate for remedial action must be included.

   c. If post-closure care is necessary, a cost estimate for it must be provided.

2. FINANCIAL ASSURANCE - The proposed mechanism for financial assurance (financial test and corporate guarantee) is not acceptable for the following reasons:

   a. The financial test is not on the State of Illinois form 35 IAC, 725.251.

   b. Keystone appears to have failed the financial test, prescribed in 35 IAC 725.243(e), for the following reasons:

      i. The company does not have the required ratio (less than 2.0) of total liabilities to net worth and

      ii. And the requirement to have a ratio of the sum of net income plus depreciation, depletion and amortization to total liabilities greater than 0.1 has not been met.

3. The auditor's opinion has not been provided. 35 IAC 725.243(e)(3).

4. The corporate guarantee has not been provided. 35 IAC 725.243(e)(10).

5. No proof has been provided that Keystone carries liability insurance for sudden or nonsudden accidental occurrences.

Pursuant to 725.212(d), you must submit a revised closure plan within 30 days which adequately responds to the above noted comments. Failure to submit a revised plan within 30 days will be considered non-compliance with the interim standards of 725 Subpart G -- Closure and Post-closure and Subpart H -- Financial Requirements.

Please follow the enclosed closure plan guidance closely in preparing your resubmittal. The guidance outlines the information which must be provided in a complete closure plan.

Should you have any questions concerning this matter, please contact Chris Liebman at 217/782-6762.

Very truly yours,

Lawrence W. Eastep, P.E., Manager
Permit Section
Division of Land Pollution Control

LWE:CJL:dw/1789F/1-6
CJL
cc: Central Region -- Peoria Subregion Region
Division File
Financial Assurance Unit
USEPA Region V -- Jodi Traub
USEPA Region V -- Mark Radell
Virginia Yang, Enforcement Section
Steve Davis, Compliance Section
David Jansen, Central Region

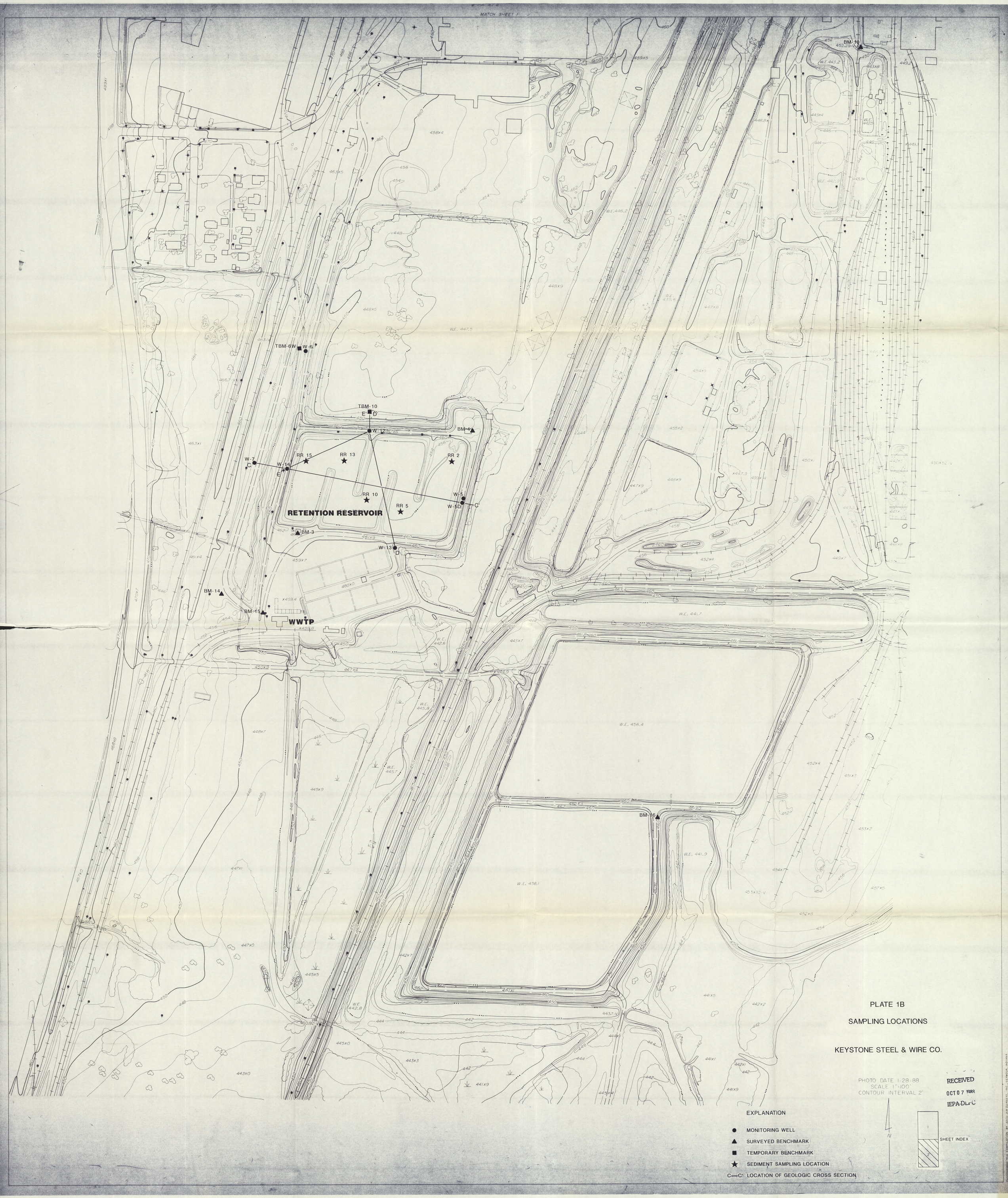

PLATE 1B

SAMPLING LOCATIONS

KEYSTONE STEEL & WIRE CO.

PHOTO DATE 1-28-88
SCALE 1"=100'
CONTOUR INTERVAL 2'

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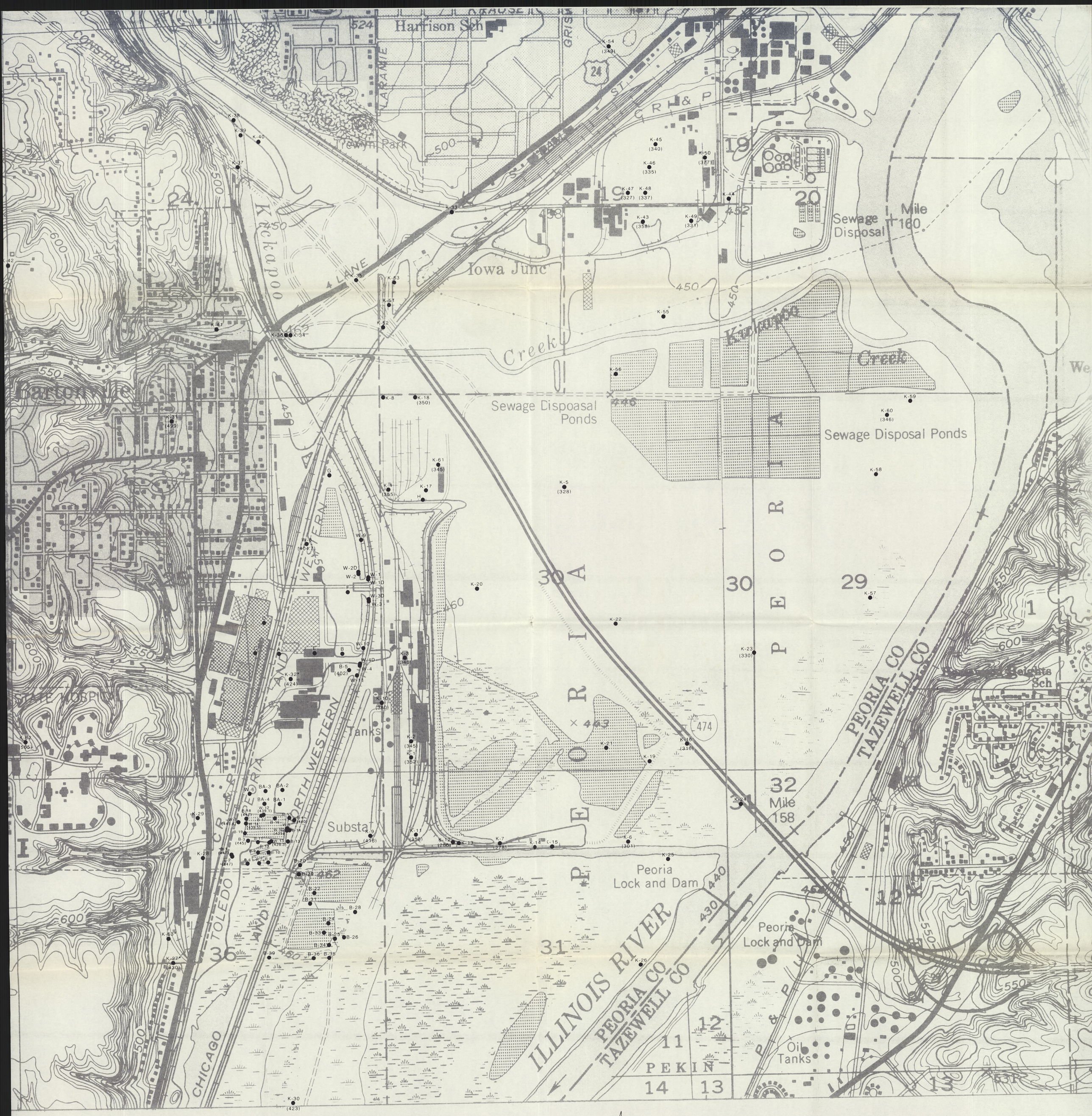
EXPLANATION

- ● MONITORING WELL
- ▲ SURVEYED BENCHMARK
- ■ TEMPORARY BENCHMARK
- ★ SEDIMENT SAMPLING LOCATION
- C—C' LOCATION OF GEOLOGIC CROSS SECTION

N

SHEET INDEX

PHOTOGRAMMETRIC COMPILATION BY ACCU-AIR SURVEYS, INC. SEYMOUR, INDIANA



EXPLANATION

K-1 ● BORING OR WELL NUMBER

(352) ELEVATION OF BEDROCK SURFACE

K-1 THROUGH K-63 - FROM ILLINOIS STATE GEOLOGICAL SURVEY AND ILLINOIS STATE WATER SURVEY FILES

BA AND B BORINGS - FROM A & H CORPORATION, 1968, SUBSURFACE INVESTIGATION AND FOUNDATION RECOMMENDATIONS

W-1 THROUGH W-14 - SITE MONITORING WELLS

A THROUGH H - SITE TEST BORINGS

BASE MAP FROM U.S.G.S 7.5' TOPOGRAPHIC QUADRANGLES - PEORIA WEST, ILL. AND PEORIA EAST, ILL.

PLATE 2

TEST BORING AND WELL LOCATIONS

KEYSTONE STEEL AND WIRE COMPANY

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