Facility Name: UNO-VEN

USEPA #: IL D 0 4 1 5 5 0 6 6 2

IEPA #: 1 9 2 4 0 3 0 0 0 4

WASTE DISPOSITION FORM

US EPA RECORDS CENTER REGION 5
1000830

Waste Name (include haz & 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	* 19 91	* 19 90	* 19 89	Amount on Site	Rate of Generation	Last Manifested Shipment	Disposition
Pho Solids	Tank Cleaning	8-12-92	D004 D006 D007 D008 D009 D018	N	N	G F	G F	G F	None	9 yds in 1992	9-4-92	Clean Harbors Chicago, IL
Leaded Corrosion Products	Tank Cleaning	6-17-92	K052	N	N	G F	G F	G F		50 cu. yds in 1992	10-30-92	"
Bender treator Catalyst	Refining Process	8-26-92	D008	N	N	G F	G F	G F		96 cu. yds in 1992	11-13-92	CID Dolton, IL
Spent Cobalt-molybdenum Catalyst	"	Knowledge ~~[illegible]~~	D018	N	N	G F	G F	G F		6500 lbs in 1991	7-20-92	Amax Metals Recovery Braithwaite, LA
Waste Paint related material	Machinery & facility maint.	Knowledge	D001	Y	Y	G F	G F	G F		6 drms in 1991	1-14-92	Ensco El Dorado, AR
Spill Residues	Clean up of Product Spills	Knowledge	D018	N	N	G F	G F	G F		200 lbs in 1991	11-17-92	Clean Harbors Chicago, IL
Waste Mercury Switches	Equipment Demolition	Know.	D009	N	N	G F	G F	G F		one time	11-2-92	Clean Harbors Natick, MA
Heat Exchanger Solids	Clean out of Heat Exchangers	5-22-92	K050	Y	Y	G F	G F	G F		31500 lbs in 1991	9-3-92	Clean Harbors Chicago, IL
Spent Nickel-molybdenum Catalyst	Refining Process	Know.	D018	N	N	G F	G F	G F		116760 lbs in 1991	5-22-91	Amax Braithwaite, LA
						G F	G F	G F				

* All "NO" responses must be explained in narrative.

IL 532-1836

LAND POLLUTION CONTROL/FOS

VIOLATION CORRELATION SHEET

VIOLATIONS	SUMMARY OF VIOLATIONS	NARRATIVE	INSPECTION CHECKLIST	PECL/CIL	COMMENTS

*NOTE: Include In Inspection Packet.

Facility Name: Uno-Ven

USEPA #: IL D 0 4 1 5 5 0 5 6 7

IEPA #: 1 9 7 8 0 3 0 0 0 4

WASTE DISPOSITION FORM

Waste Name (include haz & 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 Report for: (Circle if present; cross out if not present) * 19 91	* 19 98	* 19 89	Amount on Site	Rate of Generation	Last Manifested Shipment	Disposition
Sedimentation Sludge	Waste water Treatment	Spring 1991	F038	N	N	G F	G F	G F	None	No Longer Generated	12-13-91	CWM Calumet City, IL
API Seperator Sludge	"	6-20-88	K051	Y	Y	G F	G F	G F			4-3-91	TWI Sauget, IL
Solidified Corrugated Plate Seperator Sludge	"	Spring 1991	F037	N	N	G F	G F	G F			9-6-91	CWM Calumet City, IL
Spent Charcoal	Unit Demolition	Knowledge	D018	N	N	G F	G F	G F			12-17-91	Adams Center Landfill Fort Wayne, IN
						G F	G F	G F				
						G F	G F	G F				
						G F	G F	G F				
						G F	G F	G F				
						G F	G F	G F				
						G F	G F	G F				

* All "NO" responses must be explained in narrative.

ILD 041 550 567

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WMD RCRA
RECORD CENTER

Compliance

Illinois Environmental Protection Agency
Division of Land Pollution Control

RCRA INSPECTION REPORT

EPA #: IL D 0 4 1 5 5 0 5 6 7 | IEPA #: 1 9 7 8 0 3 0 0 0 4

Facility Name: Uno-Ven Chicago refinery | Phone #: 708/257-7761

Street Address: 135th & New Ave | County: Will

City: Lemont | State: IL | Zip: 60439

Region: Maywood | Inspection Date: 12 / 11 / 92 | From: 9:30 am To: 11:30 am

Weather: 30° Cloudy

TYPE OF FACILITY

Notified As: G TQ D | Regulated As: G (D)(T)

LDF? Y (Yes or No) HPV? N | 90-Day F/U Required?: YES ____ NO ✓

TYPE OF INSPECTION

CEI: X Sampling: ____ Citizen Complaint: ____ Closed: ____ Other: ____

CME/O&M: ____ Record Review: ____ Follow-Up to Inspection of: ____ Withdrawal: ____

NON-REGULATED STATUS

SQG: ____ Claimed Nonhandler: ____ Other (Specify in Narrative): ____

PART A

Notification Date: 8 / 15 / 80, from (initial) or (subsequent) Notification.

Initial Part A Date: 11 / 17 / 80 | Amended: 9 / 8 / 90

Part A Withdrawal requested: ___/___/___ | Approved by (US)(IL) EPA: ___/___/___

PART B PERMIT APPLICATION

Part B Permit Submitted: (Y) or N 2 / 16 / 84 | Final Permit Issued: ___/___/___

ENFORCEMENT

Has the firm been referred to – USEPA: (Y) or N 8 / 5 / 86

Illinois Attorney General: Y or N ___/___/___ County State's Attorney: Y or N ___/___/___

ORDERS ISSUED

CACO: ___/___/___ CAFO: 12 / 17 / 86 Consent Decree: ___/___/___

Federal Court Order: ___/___/___ State Court Order: ___/___/___ IPCB Order: ___/___/___

TSD FACILITY ACTIVITY SUMMARY

Activity by Process Code	On Part A?	Activity Conducted Prior to 19807	Was Activity Ever Done?	Closed	Being done at Time of Insp.?	Exempt per 35 IAC. Sec.	On Annual Report 1991	1990	1989
D 81	Y	Y	Y	N	N	N	N	N	N
S04	Y	N	Y	4-13-87	N	N	N	N	N
T01	N	N	Y	N	N	N	N	N	N

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OWNER	OPERATOR
Name Uno-Ven Chicago Refinery	Name Same
Address 135th & New Ave	Address
City Lemont	City
State IL Zip 60439	State Zip
Phone # 708-257-7761	Phone #

PERSON(S) INTERVIEWED	TITLE	PHONE #
Lee Erchull	Sr. Environ. Specialist	(708) 257-4458

INSPECTION PARTICIPANT(S)	AGENCY/TITLE	PHONE #
M. Cimaglio	IEPA/LPS	708/531-5900

PREPARED BY	AGENCY/TITLE	PHONE #

SUMMARY OF APPARENT VIOLATIONS

Area	Class	Section

Area	Class	Section

Area	Class	Section

1978030004- WILL
UNO-VEN CHICAGO REFINERY
ILD041550567
12/11/92

NARRATIVE

Uno-Ven Corporation is a petroleum refinery which processes crude oil into finished petroleum products such as gasoline, fuel oils and other related products. Hazardous wastes are produced primarily from the waste water treatment and tank cleaning/removal processes. At the time of the inspection all tank cleaning had been completed for the 1992 year, no cleaning occurs in the cold weather.

HAZARDOUS WASTES GENERATED

PLO SOLIDS- D004,D006,D007,D008,D009,D018
-Generated from tank cleaning operations.
-Rate of generation varies according to work load, 9 cu. yds. were generated in 1992.
-Waste was shipped to Clean Harbors in Chicago, IL.
-There was no waste on site.

LEADED CORROSION PRODUCTS- K052
-Generated from tank cleaning operations.
-Rate of generation varies, 50 cu. yds. were generated in 1992.
-Waste was shipped to Clean Harbors in Chicago, IL.
-There was no waste on site.

BENDER TREATER CATALYST- D008
-Generated from off spec. catalyst used in the refining process.
-Rate of generation varies according to refinery production, 96 cu. yds. were produced in 1992.
-Waste was shipped to CID in Dolton, IL.
-There was no waste on site.

SPENT COBALT-MOLYBDENUM CATALYST- D018
-Generated from off spec. catalyst used in the refining process.
-Rate of generation varies according to refinery production, 6500 lbs. were produced in 1991.
-Waste was shipped to Amax Metals Recovery in Braitlwaite, LA.
-There was no waste on site.

WASTE PAINT RELATED MATERIAL- D001
-Generated from facility maintenance.
-Rate of generation was 6 drums in 1992.
-Waste was shipped to Ensco in El Dorado, AR.
-There was no waste on site.

1978030004- WILL
UNO-VEN CHICAGO REFINERY
ILD041550567
12/11/92

NARRATIVE PG 2

SPILL RESIDUES- D018
-Generated from clean up of product spills.
-Rate of generation varies according to amount of spills, and was 200 lbs. in 1991.
-Waste was shipped to Clean Harbors in Chicago, IL.
-There was no waste on site.

WASTE MERCURY SWITCHES- D009
-Generated from demolition of equipment.
-One time generation.
-Waste was shipped to Clean Harbors in Natick, MA.
-There was no waste on site.

HEAT EXCHANGER SOLIDS- K050
-Generated from the cleaning of heat exchangers.
-Rate of generation varies, 31500 lbs. in 1991.
-Waste is shipped to Clean Harbors in Chicago, IL.
-There was no waste on site.

SPENT NICKEL-MOLYBDENUM CATALYST- D018
-Generated in the refinery process.
-Rate of generation varies, 116760 lbs. in 1991.
-Waste is shipped to Amax Metals Recovery in Braitlaite, LA.
-There was no waste on site.

HAZARDOUS WASTE UNITS

LAND APPLICATION AREA - D81
There are four land application units located on the facility's northeast side. API Separator Sludge (K051) was applied to these areas in 1980-1981. Currently non-hazardous waste is applied to these areas. Uno-Ven began closure under an IEPA approved closure plan. The plan was revoked by the IEPA before the activities were completed. According to Uno-Ven, the former land owner, Uno-Cal inc. is responsible for the closure and has not acted on this.

SURFACE IMPOUNDMENT - T02
This is a storm water retention basin. In years past, process water had been diverted into this basin before treatment and discharge. The facility is now separating the storm and process waters. This unit is undergoing closure under an USEPA approved

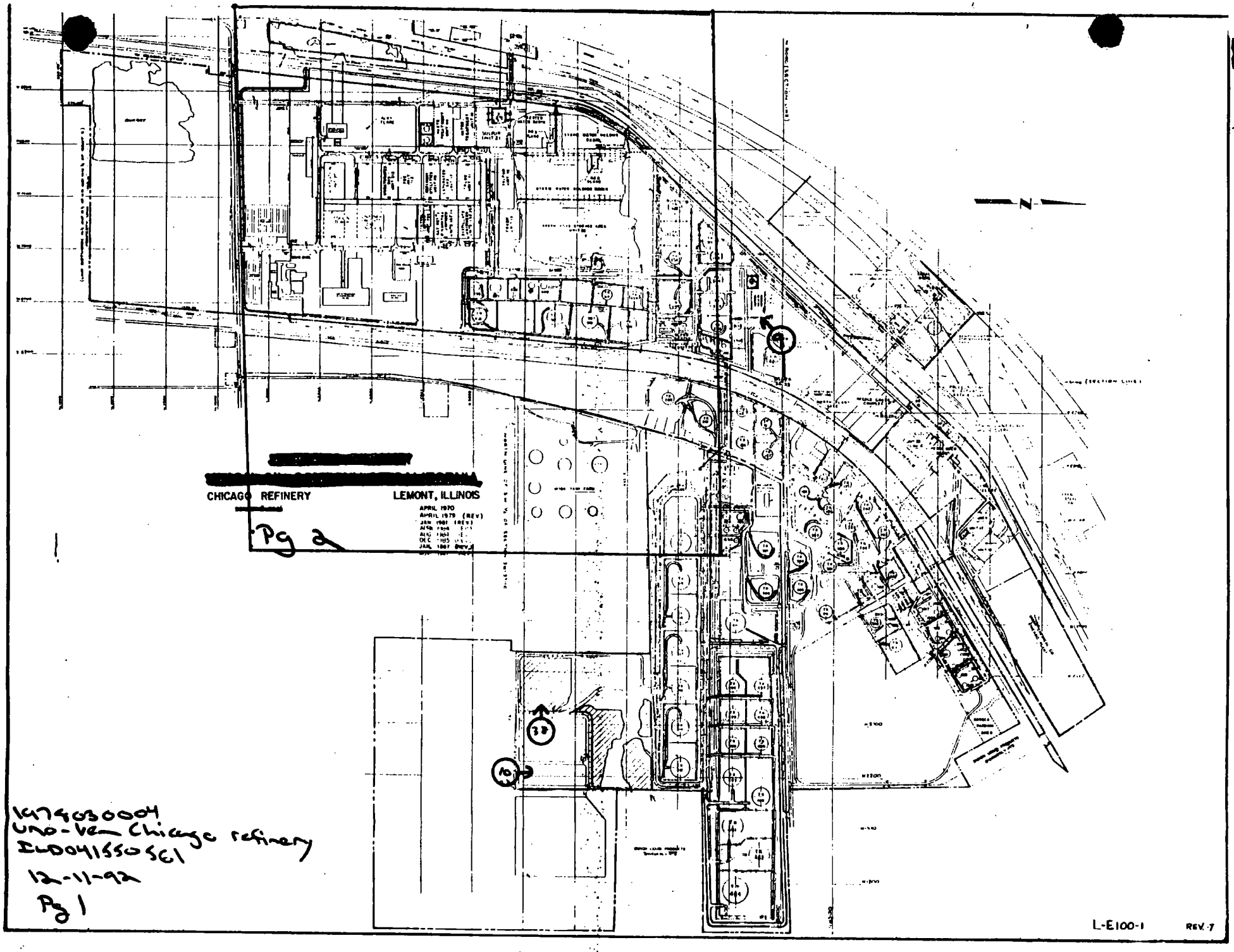
closure plan.

ACCUMULATION AREA
A staging area is located on the south end of the plant. There was no hazardous waste in this area at the time of the inspection. In fact, most hazardous waste is shipped directly from the units where it is generated. The accumulation area is only used in instances where the waste can not be removed immediately.

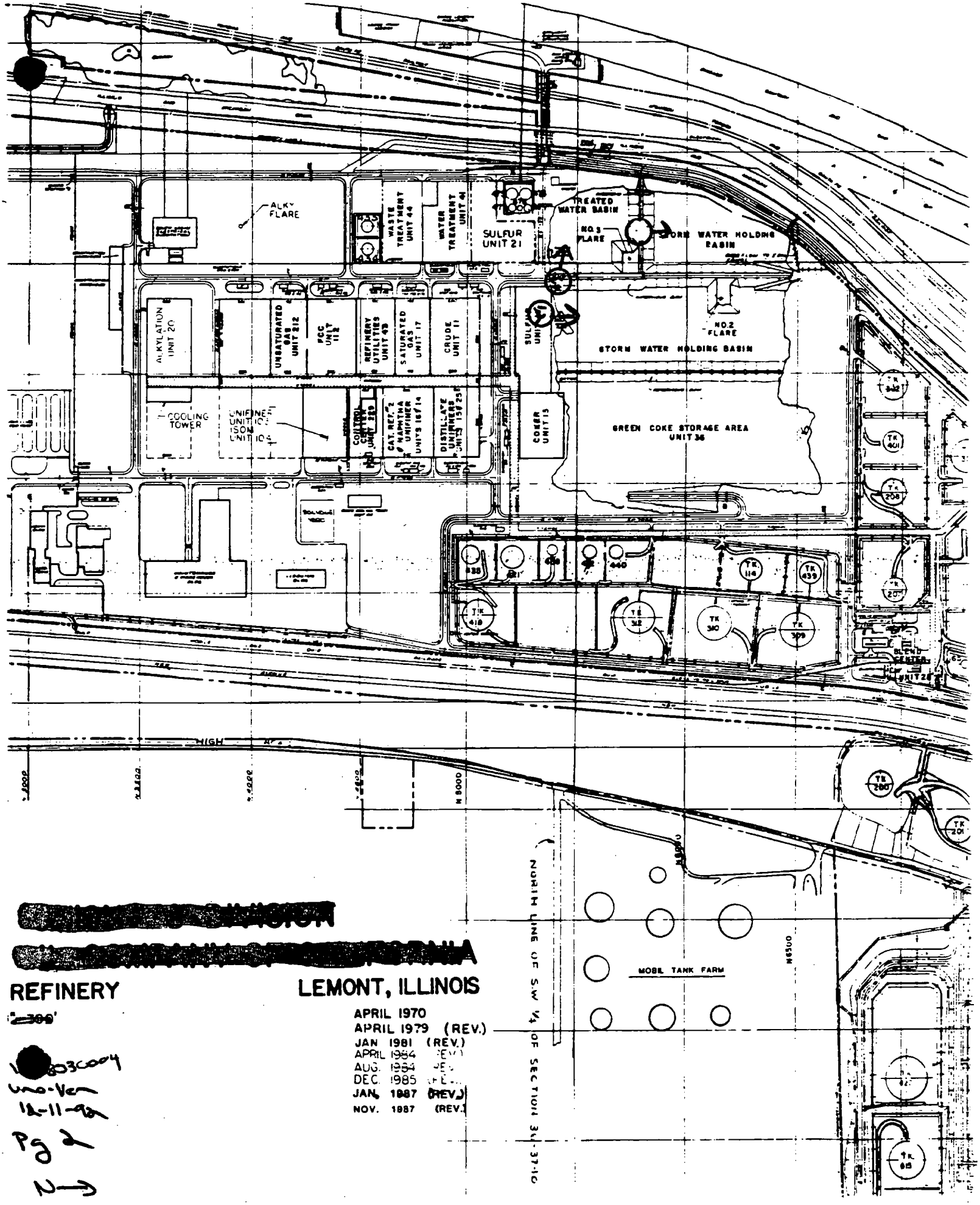
NOTES
1) While Uno-Ven is still regulated as a Generator, Treatment and disposal facility, the facility is operating as a fully regulated generator.

2) Uno-Ven plans to complete closure activities and continue operations as a generator of hazardous waste.
3) Subparts F, G & H were not addressed during this inspection.

APPARENT VIOLATIONS
There were no violations cited as a result of this inspection.



1974030004
UNO-VEN Chicago refinery
ILD041550561
12-11-92
Pg 1



[redacted]

[redacted]

REFINERY

LEMONT, ILLINOIS

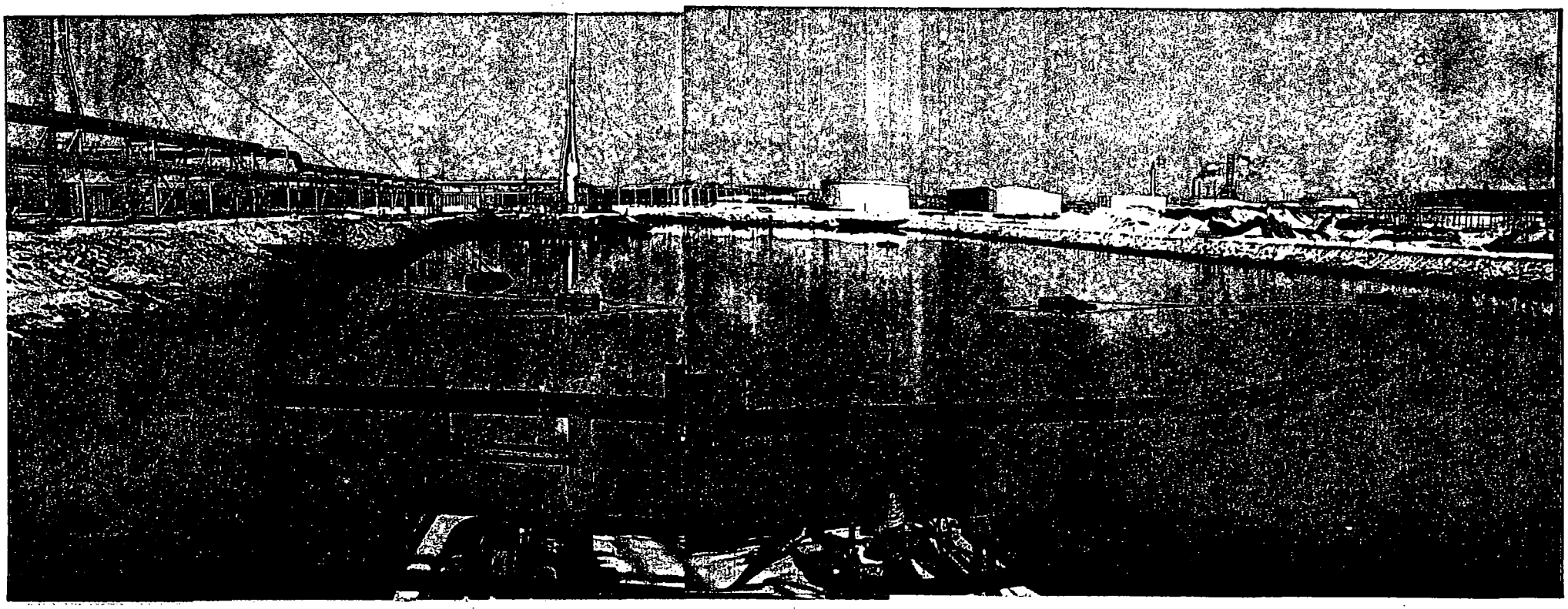
APRIL 1970
APRIL 1979 (REV.)
JAN 1981 (REV.)
APRIL 1984 (REV.)
AUG. 1984 (REV.)
DEC. 1985 (REV.)
JAN. 1987 (REV.)
NOV. 1987 (REV.)

1[redacted]03C004
Uno-Ven
12-11-92
Pg 2
N→

Illinois Environmental Protection Agency
Photographs

Site Name: Unocal Chicago Refinery IEPA #: 1978030004

Date: 12/11/92 Time: 9:30 Photograph By: Michael Cinnaglio



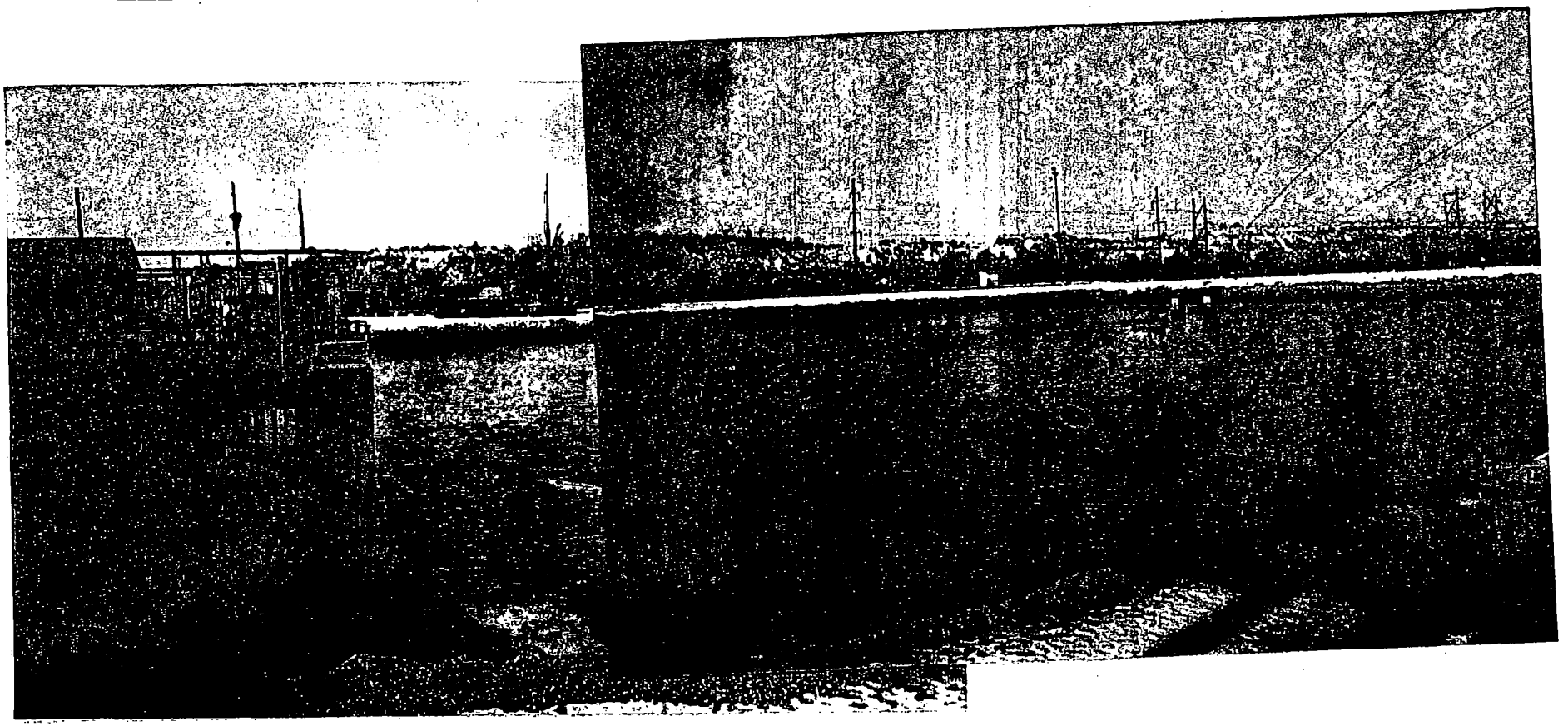
Comments: Storm water Holding basin

Roll #: 93-175 Photo #: 12

Illinois Environmental Protection Agency
Photographs

Site Name: Unocal Chicago Refinery IEPA #: 1978030004

Date: 12/11/92 Time: 9:30 Photograph By: Michael Cinaglio



Comments: Treated water basin

Roll #: 93-175 Photo #: 3,4

Illinois Environmental Protection Agency
Photographs

Site Name: Unocal Chicago Refinery IEPA #: 1978030007

Date: 12/11/92 Time: 9:30 Photograph By: Michael Cimaglio

Comments: Small Storm Water Holding basin

Roll #: 93-175 Photo #: 56

Illinois Environmental Protection Agency
Photographs

Site Name: Unocal Chicago Refinery IEPA #: 1978030004

Date: 12/11/92 Time: 9:30 Photograph By: Michael Cimaglio

Comments: Land Farm

Roll #: 93-175 Photo #: 38

Illinois Environmental Protection Agency Photographs

Site Name: Uno-Ven Chicago Refinery Site #: 1978030004

Date: 12/11/92 Time: 9:30 Photograph By: Michael Cimuglio

Comments: Accumulation area

Roll #: 93-175 Photo #: 9

Comments: Closed Land application area

Roll #: 93-175 Photo #: 10

LNO-VEN 1978030004/ILD041550567 10/31/91

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			**PART 703** **RCRA PERMIT PROGRAM** **Subpart C: Authorization by Rule and Interim Status** **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 ✓				Part-A initially filed in 11/17/80

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IL 532-1502

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**			✓	N/A. Not a new facility
				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.**				Part A ammended on 9/18/90

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**	✓			
				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 ___				Change of ownership occurred on 12/1/89.

IL 532-1502

UNO-VEN 1978030004, ILD 041550561 10/31

REVISION 0 (05/05/88)

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No
				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 in 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.**			✓	N/A - Uno-cal/uno-ven notified as a transporter. Between 1980-1981, haz. waste was transported from process areas, 1½ blocks on public roads, to the land farm area. No haz. waste has been transported since 1981.
OTH	1			**Section 723.111: USEPA Identification Number**	✓			
			a	Has the transporter obtained a USEPA identification number?				
OTH	1	X		**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 ____				

IL 532-1502

UNO-VEN 1978030004/ILD041550567
10/31/91

REVISION 1 (8/15/88)

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 ___				

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 ___				

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 ___				Indiana
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 ___				

IL 532-1082

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 ✓				No bulk shipments by water
			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 ✓				None by rail.

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**			✓	N/A - No waste ready for transport.
				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**			✓	N/A - supplied by transporter.
				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.				Facility accumulates haz. waste, treats, and has disposal units
				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.				- Regulated as disposal, Landfarms are not closed yet.
			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:				- TO2 unit due to TC Rule.
				NOTE: If no wastes in containers, mark "N/A" and skip to Section 725.291 of the Generator checklist.				- no waste has been placed in LF since 1981.

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.				No waste on-site.
			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 ____				

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No
				FOR WASTE IN TANKS, has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subpart J: Tank Systems listed below: **NOTE: If the facility has discontinued accumulation of waste in tanks, they are subject to 725.211 and 725.214.** **NOTE: If no waste in tanks, mark N/A and skip to "For waste in containers ...", Subsection a)2) page GEN-C-14.** **Assessment of Existing Tank Systems (Section 725.291)** For tanks not protected by a secondary containment system, is an independent, certified written assessment available? Yes ____ No ____ **NOTE: Except as provided in Subsection (c) of 725.291, certified assessment must be available by 1/12/88.** Does this assessment consider at least the following: 1) available standards for the tank and ancillary equipment; 2) hazardous characteristics of the wastes; 3) existing corrosion protection measures; 4) age of the tank system; and 5) results of a leak test, internal inspection, or other tank integrity examination? Yes ____ No ____			✓	NA - To tanks no waste on-site.

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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
			a2	**For waste in containers,** has the generator marked and made visisble for inspection on each container, the date upon which accumulation began? Yes ____ No ____ N/A ✓				N/A - no waste in containers.
			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, Subpart C: Preparedness and Prevention listed below: **Maintenance and Operation of Facility (Section 725.131)** 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 ____				See TSD Checklist

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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 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 ✓				Not needed.
			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 ✓				No actions.
			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 ✓				No. requests.

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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	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**			✓	N/A - not needed.
			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**			✓	N/a. not needed.
				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			**PART 725** **INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES** **Subpart A: General Provisions** **Section 725.101: Purpose, Scope and Applicability**	✓			
				Does the facility qualify for any of the exemptions under Section 725.101(c)? Yes ____ No ✓ **NOTE: 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 ✓				

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Area	Class	90 Day Fil 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 ✓				N/A - No such sources
			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 ✓				No Post-Closure
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 ____				

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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
			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 ✓				No changes ↓
			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 ✓				No waste from off-site.
			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 ___				

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Area	Class	90 Day 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 ___ NA ✓				No wastes from off-site.

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Area	Class	90 Day Fill 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); - ~~725.372~~ (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:				No wastes from off-site
				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 ✓				

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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
				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 ___				Guards, Video.
				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 ___				Fence
			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.				

IL 532-18
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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	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 ___				

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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
				- 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 ___ NA ✓				No problems.
			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 ✓				No hazards.
			d	Does the owner or operator record the results of inspections in a log or summary? Yes ✓ No ___				
			d	Does the inspection record include: - The date and time of the inspection? Yes ✓ No ___ - The name of the inspector? Yes ✓ No ___				

IL 532-1502

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 ___				

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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
				B) Key parameters for automatic waste feed cutoff systems? Yes ____ No ____ N/A ✓				No waste feed cut-off.
				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 ____				For ~~504~~. TO2
				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 ____				

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Area	Class	90 Day Fil 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 ___ NA ✓				No ignitable or reactive wastes.
			a	Are smoking and open flames restricted to specially designated areas when ignitable or reactive waste is being handled? Yes ___ No ___ NA ✓				

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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	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 ____				

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Area	Class	90 Day Fil 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.**			✓	Na - locations not used.

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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 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 ___				Alarm sys, Radio, PA sys.
			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 ___				

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LPC 256 87

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.**	✓			

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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	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 ✓				never just one employee.
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:				

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Area	Class	90 Day Ltr 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 ___				Romeoville FD, PD. Will County PD.
				3) Agreements with State emergency response teams, emergency response contractors and equipment suppliers? Yes ✓ No ___ N/A ___				Heritage.
				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 ___				Silver Cross.
				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 ✓				No refusals.

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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 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 ___				5-28-89 Gasoline spill. 1991 - Benzene spill
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 ___				

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Area	Class	90 Day Ltr 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 ___				
			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 ___				Dale Pirc Fire Chief.
			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				

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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
				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 ___				Alarm.
			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 ___				

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LPC 256 6/87

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 ✓				Never failed.
			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 ✓				No changes.
			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**	✓			Dale Pi...
				Is there an emergency coordinator on-site or on-call at all times? Yes ✓ No ___				

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LPC 250 8/87

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
				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	1/2			**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.**	✓			Gasoline spill 5.28.89 leaking valve in pipeline valve. Xylene spill in 1983. Benzene spill in 1991

IL 532-1
LPC 256

Area	Class	90 Day F Lt 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**			✓	N/A - No waste accepted from off-site.
				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 ____				

IL 532-1502
LPC 258 8/87

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 ___				

IL 532-1[illegible]
LPC 258 6/87

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 ✓				Not required.
				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 ✓				No tanks
				- 725.325 (Surface Improvements)? Yes ✓ No ___ N/A ___				
				- 725.352 (Waste Piles)? Yes ___ No ___ N/A ✓				no waste piles.
				- 725.373 (Land Treatment)? Yes ✓ No ___ N/A ___				
				- 725.441 (Incinerators)? Yes ___ No ___ N/A ✓				No incinerators.
				- 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 ✓				Not needed.

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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
				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.**				Subpart F not addressed during inspection. No such units ↓

IL 532-1502
LPC 758 8/87

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**	✓			
			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:				Closure not completed.
				- The Agency? Yes ___ No ___ NA ✓				
				- 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 ✓				No action/requests.

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LPC 256 8/87

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 ____				No wastes from off-site.
				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 ____				

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LPC 258 8/87

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:				not needed.
			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 ✓				

IL 532-1592
LPC 286 6/87

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 ✓				Closure not completed. ↓
				- 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 ___				

IL 532-199
UPC 268 8/8

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 termination.
				- 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 ✓				No decrees/orders.
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?				
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".				

IL 532-1592
LPC 258 8/87

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 I: Use and Management of Container**				
OTH	1	X		**Section 725.271: Condition of Containers**			✓	N/A - No waste in container
				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?				
OTH	1	X		**Section 725.272: Compatibility of Waste with Containers**				
				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?				
OTH	1	X		**Section 725.273: Management of Containers**				
			a	Are containers of hazardous waste always closed during storage? Yes ____ No ____				
			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 ____				

IL 532-[illegible]
LPC 258 [illegible]

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**			✓	This is a newly regulated unit. They are planning to RCRA close unit. Also, are given till 1994 to retro-fit unit w/ proper technologies.
			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 ____				

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LPC 258 8/87

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:				

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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
				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.				

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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
CLO	1			**Section 725.328: Closure and Post-Closure Care**			✓	not going through closure
				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**			✓	no 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.				

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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	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.				

IL 532-1592
LPO 256 8/87

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?			✓	no incompatibles

IL 532
LPC 258 [illegible]

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 M: Land Treatment				
OTH	1	X		Section 725.372: General Operating Requirements	✓			No waste disposed since 1981.
			a	Can the waste being placed in or on the land treatment facility be made less hazardous or non-hazardous by degradation, transformation or immobilization processes occurring in or on the soil? Yes ___ No ___ NA ✓				
			b	Has the owner or operator designed, constructed, and is he now operating and maintaining a run-on control system capable of preventing flow onto the active portions of the unit during peak discharge from at least a 25 year storm? Yes ✓ No ___				Drainage ditches.
			c	Has the owner or operator designed, constructed, and is he now operating a runoff management system capable of collecting and controlling a water volume at least equal to a 24 hour 25 year storm? Yes ✓ No ___				
			d	Are collection and holding facilities associated with run-on and runoff control systems being emptied or otherwise managed expeditiously after storms so as to maintain design capacity of the system? Yes ✓ No ___				
			e	Is the owner or operator managing the unit to control wind dispersal if the treatment zone contains particulate matter which may be subject to wind dispersal? Yes ___ No ___ N/A ✓				No waste disposed of since 1981.

IL 532-1592
LPC 256 6/87

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 725.373: Waste Analysis**			✓	No waste placed in unit since 1981.
				Prior to placing hazardous waste in or on a land treatment facility, has the owner or operator:				
			a	1) Determined the concentration of any substances which exceed the maximum concentrations contained in Table I of Section 721.124 that cause a waste to exhibit the characteristic of EP toxicity? Yes ____ No ____				
			b	2) Determined the concentration of any substances which caused the waste to be listed as a hazardous waste in Part 721, Subpart D? Yes ____ No ____				
			c	3) Determined the concentrations in the waste of arsenic, cadmium, lead and mercury, if food chain crops are grown, unless the owner or operator has written documented data that show that the constituent is not present? Yes ____ No ____				
OTH	1	X		**Section 725.376: Food Chain Crops**			✓	No food/chain crops.
			a	Has the owner or operator made the required notice under 725.376(a) if food chain crops are being grown, have been grown, or will be grown again on the land treatment facility? Yes ____ No ____				
			b1	Is the owner or operator complying with the requirements of 725.376(b) and (c) concerning the growing of food chain crops on land treatment facilities? Yes ____ No ____				

IL 532-1502

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 725.378: Unsaturated Zone (Zone of Aeration) Monitoring**	✓			
			d	Does the owner or operator have a written unsaturated zone monitoring plan and is it maintained at the facility? Yes ✓ No ___				
				Has the owner or operator implemented his unsaturated zone monitoring plan? Yes ✓ No ___				
OTH	2			**Section 725.379: Recordkeeping**	✓			
				Is the owner or operator including the date and rate of application of hazardous waste in the operating record? Yes ✓ No ___				
CLO	1			**Section 725.380: Closure and Post-Closure**			✓	
				NOTE: Determine compliance or non-compliance with this Section only in conjunction with a closure verificiation inspection conducted after the facility and its independent registered professional engineer (or independent qualified soil scientist) have certified closure in accordance with an approved closure and post-closure plan.				Closure not completed.
				Has the land treatment facility been closed in accordance with an approved closure plan? Yes ___ No ___				- going through Closure.

IL 532-1593
LPC 256 5767

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 725.381: Special Requirements for Ignitable or Reactive Wastes**			✓	no 'and' amount of these wastes.
			a	Have ignitable or reactive wastes been land treated by immediately incorporating them into the soil 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 ____				
			b	Is the waste managed in such a way that it is protected from any material or conditions which may cause it to ignite or react? Yes ____ No ____ N/A ____				
OTH	1			**Section 725.382: Special Requirements for Incompatible Wastes**			✓	
				Is the owner or operator complying with the requirements concerning the land treatment of incompatible wastes or incompatible wastes and materials contained in this Section? Yes ____ No ____				

IL 532-1502
EPA 260 8/87

GEN/TSD/TRANS

RCRA LAND DISPOSAL RESTRICTIONS INSPECTION

I. General Information

Facility: Uno-Ven Chicago Refinery

U.S. EPA ID No.: ILD 041550567/1978030004

Street: 135th + New Avenue

City: Lemont State: IL Zip: 60439

Telephone: 708-257-7761

Inspection Date: 12-11-92 Time: 1:30 (am/pm)

Weather Conditions: 30° Cloudy

	Name	Agency/Title	Telephone
Inspectors:	Mike Cimaglia	IEPA/ERS	708-531-5900
Facility Representatives:	Lee Erchull	Sr. Env. Spec	708-257-7761

See Appendix B to determine which of the following LDR waste categories the facility manages:

	Generate	Transport	Treat	Store	Dispose
F001-F005 Solvents					
F020-F023 and F026-F028					
California List*					
First Third [40 CFR 268.10]					
Second Third [40 CFR 268.11]					
Third Third [40 CFR 268.12]	X		X		X

* See Appendix A

INSPECTION SUMMARY

Processes That Generate LDR Wastes:

See attached narrative + waste disposition form

LDR Waste Management:

See attached narrative + waste disposition form

Summary:

See attached narrative

Signature:

RCRA LAND DISPOSAL RESTRICTIONS INSPECTION

II. WASTE IDENTIFICATION

A. List waste codes which the facility handles in each of the following LDR categories*:

1. F001 through F005 spent solvents: _____

2. F020-F023 and F026-F028 dioxin-containing wastes: _____

3. California List Wastes (See Appendix A): _____

4. First Third Wastes [40 CFR 268.10]: _____

5. Second Third Wastes [40 CFR 268.11]: _____

6. Third Third Wastes [40 CFR 268.12]**: K050, D001, F038, F037

*See Appendix B.
** Note: Effective 09/25/90, large quantity generators and TSDs are required to use the toxicity characteristic leaching procedure (TCLP) instead of the extraction procedure (EP) for determining the toxicity characteristic (TC). Small quantity generators must comply with this new requirement by 03/29/91. Wastes which exhibit TC, but do not exhibit EP, will be considered "newly identified" wastes. They will be regulated under 40 CFR Part 268 only after they are evaluated by U.S. EPA, even if they are characteristic for a constituent previously covered under the EP toxicity characteristic (55 FR 22531).

B. Waste Code Determination

1. Have all wastes been correctly identified for purposes of compliance with 40 CFR Part 268?*

   Yes ✓ No___

   If no, list below:

Assigned Classification	Correct Classification

*Areas of concern include: California List/waste categories with more stringent treatment standards; listed/characteristic; multi-source/single-source leachate; P and U waste codes/F and K wastes; and waste code carry through principle.

Comments: _____

2. Have both the listed and characteristic waste code been assigned, where a listed waste exhibits a characteristic? [40 CFR 268.9(a)]

Yes ___ No ___ NA ✓

Comments _____

3. Has multi-source leachate been assigned the F039 waste code?* [40 CFR 261.31]

Yes ___ No ___ NA ✓

*Leachate derived exclusively from F020-F023 and/or F026-F028 dioxin wastes retains the individual waste codes.

If yes, was single-source leachate combined to form multi-source leachate? [55 FR 22623]

Yes ___ No ___

Comments _____

C. Does the facility handle the following wastes (national capacity variances)?

1. F001-F005 contaminated soil and debris resulting from a CERCLA response action or a RCRA corrective action (expires - 11/08/90). [40 CFR 268.30(c)]

Yes ___ No ✓ List _____

2. Dioxin contaminated soil and debris resulting from a CERCLA response action or a RCRA corrective action (expires - 11/08/90). [40 CFR 268.31(b)]

Yes ___ No ✓ List _____

3. California list contaminated soil and debris resulting from a CERCLA response action or a RCRA corrective action (expires - 11/08/90). [40 CFR 268.32(d)(2)]

Yes ___ No ✓ List _____

4. K048-K052 petroleum wastes (nonwastewaters; expires - 11/08/90). [40 CFR 268.35 (b)]

Yes ✓ No ___ List K050

5. Soil and debris contaminated with wastes that had treatment standards based on incineration set in the Second Third rule - F010, F024, K009, K010, K011, K013, K014, K023, K027, K028, K029, K038, K039, K040, K043, K093, K094, K095, K096, K113, K114, K115, K116, P039, P040, P041, P043, P044, P062, P071, P085, P089, P094, P097, P109, P111, U028, U058, U069, U087, U088, U102, U107, U190, U221, U223, U235 (expires - 06/08/91). [40 CFR 268.34(d)]

Yes ___ No ✓ List _____

6. Soil and debris contaminated with wastes that had treatment standards set in the Third Third rule based on incineration, mercury retorting, or vitrification. See Appendix A: (expires - 05/08/92). [40 CFR 268.35(e)]

Yes ___ No ✓ List _____

7. The following nonwastewaters - F039, K031, K084, K101, K102, K106, P010, P011, P012, P036, P038, P065, P087, P092, U136, U151. (expires -05/08/92). [40 CFR 268.35(c)]

Yes ___ No ✓ List _____

8. The following wastes identified as hazardous based on a characteristic alone: D004 (nonwastewaters), D008 (lead materials stored before secondary smelting), D009 (nonwastewaters) (expires - 05/08/92). [40 CFR 268.35(c)]

Yes ___ No ✓ List _____

9. Inorganic solid debris as defined in 40 CFR 268.2(g)*; includes chromium refactory bricks carrying EPA Hazardous Waste Nos. K048-K052 (expires - 05/08/92). [40 CFR 268.35(c)]

Yes ___ No ✓ List _____

*Note: Incorrect reference (40 CFR 268.2(a)(7)) in Third Third rule.

10. RCRA hazardous wastes that contain naturally occurring radioactive materials (expires - 05/08/92). [40 CFR 268.35(c)]

Yes ___ No ✓ List _____

11. Wastes listed in 40 CFR 268.10, 268.11, and 268.12 that are mixed radioactive/hazardous wastes (expires - 05/08/92)*. [40 CFR 268.35(d)]

Yes ___ No ✓ List _____

*Note: 40 CFR 268.10 and 268.11 wastes incorrectly omitted from this variance in the Third Third rule.

RCRA LAND DISPOSAL RESTRICTION INSPECTION

III. GENERATOR REQUIREMENTS

A. Treatability Group/Treatment Standard Identification*

*Note: This information is generally available on LDR notifications. If not, waste profile data and other documentation should be checked.

1. F001-F005 Spent Solvent Wastes: Does the generator correctly determine the appropriate treatability group/treatment standard for each F-solvent?

Yes ___ No ___ NA ✓

If available, list each waste code and check the correct treatability group.

Waste Code	Wastewater*	Nonwastewater
___	___	___
___	___	___
___	___	___

*Less than 1% by weight total organic carbon (TOC), or less than 1% by weight total F001-F005 solvent constituents listed in 40 CFR 268.41, Table CCWE. [40 CFR 268.2(f)(1)]

Comments _____

2. F020-F023 and F026-F028 Dioxin Wastes: Does the generator correctly determine the appropriate treatability group/treatment standard for each dioxin waste?

Yes ___ No ___ NA ✓

If yes, list each waste code and check the correct treatability group.

Waste Code	Wastewater*	Nonwastewater
___	___	___
___	___	___
___	___	___

Comments _____

*Less than 1% TOC by weight and less than 1% total suspended solids (TSS) by weight. [40 CFR 268.2(f)]

3. First, Second, and Third Third Wastes:

a. Does the generator correctly determine the appropriate treatability group/treatment standard for each waste?

Yes ✓ No ___ NA ___

If available, list each waste code and check the correct treatability group:

Waste Code	Subcategory	Wastewater*	Nonwastewater
K050			✓
D001			✓
F037			✓
F038			✓

* Less than 1% TOC by weight and less than 1% total suspended solids (TSS) with the following exceptions: K011, K013, and K014 wastewaters - less than 5% by weight TOC and less than 1% by weight TSS; K103 and K104 wastewaters - less than 4% by weight TOC and less than 1% by weight TSS. [40 CFR 268.2(f)(2) and (3)]

Comments_____

b. Do the assigned treatment standards for listed wastes cover constituents that may cause the waste to exhibit any characteristics? [40 CFR 268.9 (b)]

Yes ✓ No __ NA __

c. Does the generator specify alternative treatment standards for lab packs?*

Yes __ No __ NA ✓

*Use of the alternative treatment standards is not required. [55 FR 22629]

If yes, do lab packs only contain the following wastes?* [40 CFR 268.42(c)(2)]

__ Organometallics: 40 Part 268, Appendix IV constituents
__ Organics: 40 CFR Part 268, Appendix V constituents

*Unregulated wastes and hazardous wastes which meet treatment standards may be commingled in the appropriate Appendix IV and V lab pack. [55 FR 22629]

d. Does the generator specify alternative treatment standards for F039 multi-source leachate?*

Yes __ No __ NA ✓

*Use of the alternative treatment standards is required. [55 FR 22619]

4. California List Wastes: Has the generator correctly identified the treatability group and treatment standard/prohibition level for the following wastes? [55 FR 22675]

a. Liquid hazardous wastes containing PCBs ≥50 ppm

Yes __ No __ NA ✓

If yes, check the appropriate treatability group:

__ 50 to 500 ppm PCBs
__ ≥500 ppm PCBs

b. Listed or characteristic wastes containing ≥1,000 mg/l (liquids) or mg/kg (non-liquids) HOCs, which are not listed or characterized by the HOC content

Yes ___ No ___ NA ✓

If yes, check the appropriate treatability group:

___ Dilute HOC wastewater (1,000 mg/l to 10,000 mg/l HOCs)
___ All other HOCs greater than or equal to the prohibition level of 1,000 mg/l (liquids) or mg/kg (non-liquids)

c. Liquid hazardous wastes that exhibit a characteristic and also contain ≥ 134 mg/l nickel and/or ≥130 mg/l thallium

Yes ___ No ___ NA ✓

5. National Capacity Variance Wastes: Have all applicable California List prohibitions been identified for wastes covered under national capacity variances? (See Appendix A.)

Yes ___ No ___ NA ✓

If a wastestream contains a mixture of wastes, and a variance only applies to some of the waste codes, has the generator identified all applicable treatment standards and California List prohibitions? (See Appendix A.)

Yes ___ No ___ NA ✓

If California List prohibitions apply to wastestreams managed by the generator, complete the following table for each waste code, noting the date on which relevant national capacity variances expire.

Waste Code	Cal List Applicability	Expiration Date
___	_____	__/__/__
___	_____	__/__/__
___	_____	__/__/__

Comments _____

6. Treatment standards expressed as required technologies: Has the generator specified an alternative method to that required in 40 CFR 268.42?

Yes ___ No ___ NA ✓

If yes, list the waste code, the technology specified in 40 CFR 268.42, the alternative method, and documentation of approval. [40 CFR 268.42(b)]

Waste Code	Required Technology	Alternative Method	Approval
___	_____	_____	_____
___	_____	_____	_____
___	_____	_____	_____

Comments _____

7. Does the generator mix restricted wastes with different treatment standards for a constituent of concern?

Yes ___ No ✓

If yes, did the generator select the most stringent treatment standards? [40 CFR 268.41(b) and 268.43(b)]

Yes ___ No ___

Comments _____

B. Waste Analysis

1. Does the generator determine whether restricted wastes exceed treatment standards/prohibition levels at the point of generation?* [268.7(a)]

Yes ✓ No ___

*Note: This determination may be made at the point of disposal if the waste only has a prohibition level in effect.

If no, does the generator ship all restricted wastes as not meeting treatment standards?

Yes ___ No ___

Comments _____

2. Which of the following analytical methods does the generator employ?*

*Note: A "No" answer to applicable questions b. through d. does not necessarily constitute a violation. However, knowledge of waste is rarely adequate if a generator certifies that treatment standard criteria have been met.

a. Knowledge of waste:

Yes ✓ No ___

If yes, list the wastes for which applied knowledge was used and describe the basis of determination. Attach documentation. [40 CFR 268.7(a)(5)]

See waste description

b. TCLP*: Are wastes with treatment standards specified in 40 CFR 268.41 analyzed using TCLP?** (BDAT*** = stabilization/immobilization technology)

Yes ✓ No ___ NA ___

*TCLP = Toxicity Characteristic Leaching Procedure (40 CFR Part 268, Appendix I, EPA Test Method 1311)
**See Appendix C for exceptions.
***BDAT = best demonstrated available technology. See Appendix A.

If yes, list the wastes for which TCLP was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results. [40 CFR 268.7(a)(5)]

See waste disposition form attached

c. Total constituent analysis: Are wastes with treatment standards specified in 268.43 analyzed using total constituent analysis?* (BDAT = destruction/removal technology)

Yes ___ No ___ NA ✓

*See Appendix C for exceptions.

If yes, list the wastes for which total constituent analysis was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results. [40 CFR 268.7(a)(5)]

d. PFLT*: Was PFLT used to determine if California List constituents were contained in *liquid* hazardous waste?

Yes ___ No ___ NA ✓

*PFLT = Paint Filter Liquids Test (Test Method 9095, EPA Publication No. SW-846)

If yes, list the wastes for which PFLT was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results. [40 CFR 268.7 (a)(5)]

3. Does the generator treat restricted wastes in 90-day tanks or containers regulated under 40 CFR 262.34 (permissible in some states)?

Yes ___ No ✓ (If No, go to 4.)

Does the generator treat the wastes to meet appropriate treatment standards/prohibition levels?

Yes ___ No ___

If yes, has the generator prepared a waste analysis plan detailing the frequency of testing to be conducted? 40 CFR 268.7(a)(4)]

Yes ___ No ___ (If No, go to 4.)

Does the plan fulfill the following? [40 CFR 268.7(a)(4)(i)]

___ Based on a detailed chemical and physical analysis of a representative sample
___ Contains information necessary to treat the wastes in accordance with 40 CFR Part 268 requirements

Has the plan been filed with the Regional Administrator (return receipt, Federal Express slip, etc. required for verification)? [40 CFR 268.7(a)(4)(ii)]

Yes ___ No ___

Comments _____

4. Dilution Prohibition [40 CFR 268.3]:

a. Does the generator mix prohibited* wastes with different treatment standards?

*See Appendix E for distinction between restricted and prohibited wastes.

Yes ___ No ✓ (If No, go to b.)

List the wastes _____

Are the wastes amenable to the same type of treatment? [55 FR 22666]

Yes ___ No ___

Comments _____

b. Does the generator dilute prohibited wastes to meet treatment standard criteria, or render them non-hazardous? [55 FR 22665-22666]

Yes ___ No ✓ (If No, go to c.)

Check appropriate category:

___ Dilutes to meet treatment standards
___ Dilutes to render waste non-hazardous

Do the wastes fall into the following categories? (Check if appropriate.) [40 CFR 268.3(b)]

___ Managed in treatment systems regulated under the Clean Water Act
___ Non-toxic* characteristic wastes
___ Treatment standard specified in 40 CFR 268.41 or 268.43

*Non-toxic = D001(except high TOC nonwastewaters), D002, and D003(except cyanides and sulfides). [55 FR 22666]

If the wastes do not fall into the above categories, briefly describe the conditions under which they were diluted.

_____

c. Based on an assessment of points a. and b., and any other relevant circumstances, does the generator dilute prohibited wastes as a substitute for adequate treatment? [40 CFR 268.3(a)]

Yes ___ No ✓

Comments _____

Does the generator provide a notification to the treatment or storage facility? [40 CFR 268.7(a)(1)]

Yes ___ No ___ (If No, go to 3.)

If the generator specifies alternative treatment standards for lab packs, is the certification required in 40 CFR 268.7(a)(7) or (8) included with the notification?

Yes ___ No ___ NA ___

b. Is a notification sent with each waste shipment?

Yes ___ No ___

If no, is the waste subject to a tolling agreement pursuant to 262.20(e) (small quantity generator only)?

Yes ___ No ___ (If No, go to 3.)

List waste codes and subsequent handler with whom a contractual tolling agreement is held.

Waste Code	Subsequent Handler
___	_____
___	_____
___	_____

Did the small quantity generator provide a notification to the receiving facility with the first waste shipment subject to the tolling agreement? [40 CFR 268.7(a)(9)]

Yes ___ No ___

3. Off-Site Management: Waste Meets Treatment Standards

a. Does the generator ship waste that meets treatment standards/prohibition levels to an off-site disposal facility?

Yes ___ No ✓ (If No, go to 4.)

Identify waste code(s) and off-site disposal facilities:

Waste Code	Receiving Facility
___	_____
___	_____
___	_____

Does the generator provide a notification and a certification to the disposal facility? [40 CFR 268.7(a)(2)(i) and 268.7(a)(2)(ii)]?

Yes ___ No ___ (If No, go to d.)

5. F039 Multi-source leachate: Has the generator run an initial analysis for all constituents of concern in 40 CFR 268.41 and 268.43? [55 FR 22620]

Yes ___ No ___ NA ✓

C. Management

1. On-Site Management

a. Are restricted wastes treated (other than in a RCRA exempt unit), stored for greater than 90 (small quantity generator* - 180) days, or disposed on site?

Yes ✓ No ___

(If yes, the TSD Checklist must also be completed.)

* Small quantity generator = generator of greater than or equal to 100 kg/mo. but less than 1,000 kg/mo. hazardous waste, or less than 1 kg/mo. acutely hazardous waste

Comments _____

b. If the generator treats characteristic wastes in systems regulated under the Clean Water Act, have the following been documented: the determination of restriction, how restricted wastes are managed, and why wastes discharged pursuant to an NPDES permit are not prohibited (if applicable)? [55 FR 22662]

Yes ___ No ___ NA ✓

c. If the generator treats characteristic wastes in RCRA exempt units to render them non-hazardous, are the wastes managed as restricted until 40 CFR Part 268 treatment standards are met?* [40 CFR 268.9(d)]

Yes ___ No ___ NA ✓

*This applies to both concentration based treatment standards specified in 40 CFR 268.41 and 268.43, and to some 40 CFR 268.42 required methods which result in treatment below the characteristic level. See Appendix B.

2. Off-Site Management: Waste Exceeds Treatment Standards

a. Does the generator ship any waste that exceeds treatment standards /prohibition levels (not subject to a national capacity variance) to an off-site treatment or storage facility?

Yes ✓ No ___ (If No, go to 3.)

Identify waste code(s) and off-site treatment or storage facilities to which wastes are shipped.

Waste Code	Receiving Facility
See Waste Disposition	

b. Are a notification and a certification sent with each waste shipment?

Yes ✓ No ___

If no, is the waste subject to a tolling agreement pursuant to 262.20(e) (small quantity generator only)?

Yes ___ No ___ (If No, go to c.)

List waste codes and subsequent handler with whom a contractual tolling agreement is held.

Waste Code	Subsequent Handler
___	___
___	___
___	___

Did the small quantity generator provide a notification and a certification to the receiving facility with the first waste shipment subject to the tolling agreement? [40 CFR 268.7(a)(9)]

Yes ___ No ___

c. Are characteristic wastes which have been rendered non-hazardous (in a RCRA exempt unit) shipped to a Subtitle D facility?

Yes ___ No ___ NA ___ (If No or NA, go to 4.)

Complete the following table:

Waste Code	Receiving Facility
___	___
___	___
___	___

Are a notification and a certification for each shipment sent to the Regional Administrator or authorized State? [40 CFR 268.9(d)(1) and 268.7(b)(5)]?

Yes ___ No ___

4. Off-Site Management: Wastes Subject to Variances, Extensions, or Petitions

a. Does the generator ship wastes to a treatment, storage, or disposal facility which are subject to a national capacity variance (40 CFR Part 268, Subpart C), or case-by-case extension (40 CFR 268.5)?

Yes ___ No ✓ (If No, go to 5.)

Complete the following table:

Waste Code	Receiving Facility
___	___
___	___
___	___

Does the generator provide notification to the off-site receiving facility that the waste is not prohibited from land disposal? [40 CFR 268.7(a)(3)]

Yes ___ No ___

b. Is a notification sent with each waste shipment?

Yes ___ No ___

If no, is the waste subject to a tolling agreement pursuant to 40 CFR 262.20(e) (small quantity generator only)?

Yes ___ No ___ (If No, go to 5.)

List waste codes and subsequent handler with whom a contractual tolling agreement is held.

Waste Code	Subsequent Handler
___	_____
___	_____
___	_____

Did the small quantity generator provide a notification to the receiving facility with the first waste shipment subject to the tolling agreement? [40 CFR 268.7(a)(9)]

Yes ___ No ___

5. Records Retention

Does the generator retain on site copies of all notifications, certifications, and other relevant documents for a period of 5 years? [40 CFR 268.7(a)(6)]

Yes ✓ No ___

Are copies of relevant tolling agreements, along with the LDR notification and/or certification, kept on site for at least 3 years after expiration or termination of the agreement? [40 CFR 268.9]

Yes ___ No ___ NA ✓

Do LDR documents reflect proper management of wastes previously covered under expired national capacity variances, case by case extensions and the soft hammer provision*?

Yes ✓ No ___ NA ___

*See Appendix B. Note that the soft hammer provision expired as of 05/08/90. Soft hammer wastes which had treatment standards established in the Third Third rule were granted a minimum 90-day national capacity variance to 08/08/90.

Comments _____

D. **Treatment Using RCRA 40 CFR Parts 264 and 265 Exempt Units or Processes**

1. Are restricted wastes treated in RCRA exempt units (i.e., boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.)?

Yes ✓ No ___ (If No, do not complete this section.)

List types of waste treatment units and processes:

Waste Code	Type of Treatment	Treatment Units and Processes
K050	wastewater	wastewater treatment tanks
F038	pretreatment	"
F037		"

2. Are treatment residuals generated from these units?

Yes ✓ No ___

Comments ___

3. Are residuals further treated, stored for greater than 90/180 days, or disposed on site?

Yes ___ No ✓ NA ___

(If yes, the TSD checklist must also be completed.)

E. **Additional Comments, Concerns, or Issues Not Addressed in the Checklist:**

RCRA LAND DISPOSAL RESTRICTION INSPECTION

IV. TSD REQUIREMENTS

No longer land apply. Landfarming occurred from Nov. 1980 to Sept. 1981. No waste accepted from off-site

A. Waste Analysis [40 CFR 268.7(b), 264.13, and 265.13]

1. Does the waste analysis plan address the following LDR waste categories? [40 CFR 264.13(b)(6) and 265.13(b)(6)]

F001-F005 Spent Solvents	Yes ___	No ✓	NA ✓
F020-F023 and F026-F028 Dioxins	Yes ___	No ___	NA ✓
California List Wastes	Yes ___	No ___	NA ✓
First, Second, and Third Third Wastes	Yes ✓	No ___	NA ___

Comments _____

2. Has the waste analysis plan been revised to address F039 multi-source leachate?

Yes ___ No ___ NA ✓

3. What date was the waste analysis plan last revised? 7/16/84

4. Does analytical data contain all the information required to treat, store, or dispose of restricted wastes? [40 CFR 264.13(a)(1) and 265.13(a)(1)]

Yes ✓ No ___

If yes, which of the following are sources of analytical data? (More than one may apply.):

✓ Generator provides data
___ Facility performs analyses in on-site laboratory
___ Facility contracts analyses at off-site laboratory

If the generator provides data, does the facility provide corroborative testing? [40 CFR 264.13(a)(2) and 265.13(a)(2)]

Yes ___ No ___ NA ✓ On-site disposal

If analyses are conducted off site, identify lab: _____

a. Are wastes with treatment standards specified in 40 CFR 268.41 analyzed using the toxicity characteristic leaching procedure (TCLP)?* (BDAT** = stabilization/immobilization technology) [40 CFR 268.7(b)(1)]

Yes ___ No ___ NA ✓ disposed of before TCLP

*See Appendix C for exceptions.
**BDAT = best demonstrated available technology. See Appendix A.

If yes, list the wastes for which TCLP was used and provide the date of last test, frequency of testing, and note any problems. Attach test results. [40 CFR 264.73 (b)(3) and 265.73(b)(3)]

b. Are wastes with treatment standards specified in 40 CFR 268.43 analyzed using total constituent analysis?* (BDAT = destruction/removal technology) [40 CFR 268.7(b)(3)]

Yes ___ No ___ NA ✓

*See Appendix C for exceptions.

If yes, list the wastes for which total constituent analysis was used and provide the date of last test, frequency of testing, and note any problems. Attach test results. [40 CFR 264.73 (b)(3) and 265.73(b)(3)]

c. Is the paint filter liquids test (PFLT) used to determine if California List wastes are contained in *liquid* hazardous waste? [40 CFR 268.32(i)]

Yes ___ No ___ NA ✓

If yes, list the wastes for which PELT was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results. [40 CFR 264.73(b)(3) and 265.73(b)(3)]

B. Operating Record [40 CFR 264.73 and 265.73]

1. Does the operating record contain records and results of waste analyses performed as specified in 40 CFR 268.4 and/or 40 CFR 268.7(b)? [40 CFR 264.73(b)(3) and 265.73(b)(3)]

Yes ✓ No ___

2. Does the operating record contain copies of LDR notifications and certifications?* [40 CFR 264.73(b)(11), (13), and (15) and 40 CFR 265.73(b)(11), (13), and (15)]

Yes ___ No ___ NA ✓ No off-site waste received

*Include both those received from generators, and those prepared for off-site shipments.

3. Does the operating record include appropriate documentation for restricted wastes which are managed wholly on site? [40 CFR 264.73(b)(12), (14), and (16) and 265.73(b)(12), (14), and (16)]

Yes ✓ No ___ NA ___

Does the documentation discussed in points 2. and 3. reflect proper historical management of wastes previously covered under expired national capacity variances, case by case extensions, and the soft hammer provision?*

Yes ___ No ___ NA ✓

*Note that the soft hammer provision expired as of 05/08/90. Soft hammer wastes which had treatment standards established in the Third Third rule were granted a minimum 90-day national capacity variance to 08/08/90.

C. Storage [40 CFR 268.50]

1. Are prohibited* wastes stored on site in containers?

Yes ___ No ✓ (If No, go to 2.)

*See Appendix E for distinction between restricted and prohibited wastes.

Are all containers clearly marked to identify the contents and date(s) entering storage? [40 CFR 268.50(a)(2)(i)]

Yes ___ No ___

Have wastes been stored for more than one year since the applicable LDR regulations went into effect?

Yes ___ No ___ (If No, go to 2.)

Can the facility show that such accumulation is necessary to facilitate property recovery, treatment, or disposal? [40 CFR 268.50 (c)]

Yes ___ No ___

If yes, state how: _____

2. Are prohibited wastes stored on site in tanks?

Yes ___ No ✓ (If No, go to 3.)

Are all tanks clearly marked with a description of the contents, the quantity of each hazardous waste received, and date each period of accumulation begins, or is such information recorded and maintained in the operating record? [40 CFR 268.50(a)(2)(ii)]

Yes ___ No ___

Have tanks been emptied at least once per year since the applicable LDR regulations went into effect?

Yes ___ No ___ (If Yes, go to 3.)

Can the facility show that such accumulation is neccesary to facilitate proper recovery, treatment, or disposal? [40 CFR 268.50(c)]

Yes ___ No ___

If yes, state how:_____

3. Does the facility store liquid hazardous waste containing PCBs at concentrations greater than or equal to 50 ppm?

Yes ___ No ✓ (If No, go to D.)

Does the facility meet the TSCA criteria in 40 CFR 761.65(b)? [40 CFR 268.50(f)]

Yes ___ No ___

Have these wastes been stored for more than one year? [40 CFR 268.50(f)]

Yes ___ No ___

D. Treatment

No treatment

Does the facility treat restricted wastes other than in surface impoundments?

Yes ___ No ✓ (If No, do not complete this section. Go to E.)

2. Are required technologies used to treat wastes which have treatment standards specified in 40 CFR 268.42? [40 CFR 268.40(b)]

Yes___ No___ NA___ (If Yes or NA, go to 3.)

Was an alternative method approved?

Yes___ No___

List each waste code, the technology specified in 40 CFR 268.42, and the alternative method. Check if approval of the alternative method is documented. [40 CFR 268.42(b)]

Waste Code	Required Technology	Alternative Method	Approval

3. Lab packs: If alternative treatment standards are specified, are incinerator residues from lab packs containing D004, D005, D006, D007, D008, D010, and D011 treated in compliance with the subpart D treatment standards for these characteristic wastes? [40 CFR 268.42(c)(4)]

Yes___ No___ NA___

4. Describe all other waste codes and treatment processes:

Waste Code	Treatment Processes
_____	_____
_____	_____
_____	_____

5. Characteristic wastes:

Is the 40 CFR Part 268 treatment standard lower than the 40 CFR Part 261 characteristic level?*

Yes ___ No ___

*This applies to both concentration based treatment standards specified in 40 CFR 268.41 and 268.43, and to some 40 CFR 268.42 required methods which result in treatment below the characteristic level. See Appendix D.

If yes, does the facility manage the waste as restricted until 40 CFR Part 268 treatment standards are met, even after the waste is rendered non-hazardous? [40 CFR 268.9(d)]

Yes ___ No ___

Comments _____

6. Dilution Prohibition [40 CFR 268.3]:

a. Does the facility mix prohibited wastes with different treatment standards?

Yes ___ No ___ (If No, go to c.)

List the wastes _____

b. Are the wastes amenable to the same type of treatment? [55 FR 22666]

Yes ___ No ___

If yes, is this method used for the aggregated wastes?

Yes ___ No ___

Comments _____

c. Based on an assessment of points a. and b., or any other relevant information, is dilution used as a substitute for treatment? [40 CFR 268.3(a)]

Yes ___ No ___

Comments _____

7. Does the facility, in accordance with an acceptable waste analysis plan, test residues from all treatment processes? [40 CFR 268.7(b)]

Yes ___ No ___

Comments _____

8. Does the facility ship any characteristic wastes which have been rendered non-hazardous to a Subtitle D facility?

Yes ___ No ___ (If No, go to 9.)

Complete the following table:

Waste Code	Receiving Facility
___	_____
___	_____
___	_____

Are a notification and a certification for each shipment sent to the Regional Administrator or authorized State? [40 CFR 268.9(d)(1) and 268.7(b)(5)]

Yes ___ No ___

9. Does the facility ship any wastes or treatment residues to an off-site land disposal facility?

Yes ___ No ___ (If No, go to 10.)

Complete the following table:

Waste Code	Receiving Facility
___	_____
___	_____
___	_____

Are a notification and a certification provided to the land disposal facility with each waste shipment? [40 CFR 268.7(b)(4) and 40 CFR 268.7(b)(5)]

Yes ___ No ___

10. Does the facility ship any wastes or treatment residues to be further managed at a different treatment or storage facility?

Yes ___ No ___ (If No, go to E.)

Complete the following table:

Waste Code	Receiving Facility
____	_____
____	_____
____	_____

Are appropriate generator notifications and certifications provided to the receiving facility with each waste shipment? [40 CFR 268.7(b)(6)]

Yes ___ No ___

E. Surface Impoundments [40 CFR 268.4]

1. Are restricted wastes placed in surface impoundments for treatment?

   Yes ___ No ✓ (If No, go to F.)

   List _____

2. Are evaporation or dilution the only recognizable treatment occurring in the surface impoundment? [40 CFR 268.3(a) and 268.4(b)]

   Yes ___ No ___

   Comments _____

3. Has the facility submitted to the Agency a waste analysis plan and certification of compliance with minimum technology requirements and ground-water monitoring requirements? [40 CFR 268.4(a)(4)]

   Yes ___ No ___

4. If the minimum technology requirements have not been met, has a waiver been granted for that unit? [40 CFR 268.4(a)(3)(ii)]

   Yes ___ No ___ NA ___

5. Are representative samples of sludge and supernatant from the surface impoundment tested separately, acceptably, and in accordance with the sampling frequency and analyses specified in the waste analysis plan? (Attach test results.) [40 CFR 268.4(a)(2)(i)]

   Yes ___ No ___

6. Does the operating record adequately document the results of waste analyses performed in accordance with 40 CFR 268.4? [40 CFR 264.73(b)(3) and 265.73(b)(3)]

   Yes ___ No ___

   Comments _____

7. Do the treatment residues (sludges or liquids) exceed applicable treatment standards/prohibition levels?

Sludge Yes ___ No ___ Waste Code _____
Supernatant Yes ___ No ___ Waste Code _____

Provide the frequency of analyses conducted on treatment residues:

_____

8. If sludge residues exceed treatment standards/prohibition levels, are they removed on an annual basis? [40 CFR 268.4(a)(2)(ii)]

Yes ___ No ___ NA___

Comments _____

Are residues subsequently managed in another surface impoundment? [40 CFR 268.4(a)(2)(iii)]

Yes ___ No ___

9. If supernatant is determined to exceed treatment standards, is annual throughput greater than impoundment volume? [40 CFR 268.4(a)(2)(ii)]

Yes ___ No ___ NA___

Comments _____

F. Land Disposal

Activity ceased in 1981. N/A

1. Are restricted wastes placed in or on the land in units such as landfills, surface impoundments*, waste piles, land treatment units, salt domes/beds, mines/caves, concrete vaults, or bunkers? [40 CFR 268.2(c)]

Yes ✓ No ___ (If No, go to G.)

*Note: Do not include surface impoundments addressed in E.

If yes, specify which units and what wastes each unit has received:

Unit	Waste
land treatment	K051

2. Does the facility, in accordance with an acceptable waste analysis plan, test prohibited wastes prior to land disposal to ensure that all applicable treatment standards and/or prohibition levels have been met? [40 CFR 268.7(c)(2)]

Yes ___ No ✓ Ceased activities in 1981

Comments _____

✓

3. Does the facility test wastes to ensure that they do not exhibit any characteristics at the point of disposal?* [40 CFR 268.9(c)]

Yes ___ No ___ NA___

*Note: A waste may exceed a characteristic level only if the treatment standard for that characteristic has been met.

4. Does the operating record adequately document the results of waste analyses performed in accordance with 40 CFR 268.7(c)? [40 CFR 264.73(b)(3) and 265.73(b)(3)

Yes ___ No ___

If yes, at what frequency are analyses performed?_____

_____

5. Does the facility land dispose of restricted wastes which are not prohibited?

Yes ___ No ___ (If No, go to 6.)

List waste codes in appropriate category below:

National Capacity Variance (40 CFR Part 268, Subpart C)_____
Case-By-Case Extension (40 CFR 268.5)_____
No-Migration Petition (40 CFR 268.6)_____
Treatment Standard Variance (40 CFR 268.44)_____

Does the operating record contain records of the quantities, date of placement, and a copy of the generator notification [40 CFR 268.7(a)(3)] for each shipment of restricted waste subject to a case-by case extension or no-migration petition? [40 CFR 264.73(b)(10) and 265.73(b)(10)]

Yes ___ No ___ NA ___

Do land disposal units receiving wastes covered by a national capacity variance or case-by-case extension meet the requirements in 40 CFR 268.5(h)(2)?

Yes ___ No ___ NA ___

If the facility has a case-by-case extension, is progress being made as described in reports to the Regional Administrator?

Yes ___ No ___ NA ___

6. Are restricted wastes placed in underground injection wells?

Yes ___ No ___ List _____

G. Other Wastestreams

1. Does the facility generate wastes other than residues from RCRA treatment units?

Yes ___ No ✓ (If No, go to H.)

2. On-Site Management

a. If characteristic wastes are treated in systems regulated under the Clean Water Act, have the following been documented: the determination of restriction, how restricted wastes are managed, and why wastes discharged pursuant to an NPDES permit are not prohibited (if applicable)? [55 FR 22662]

Yes ___ No ___ NA ___

b. If characteristic wastes are treated in RCRA exempt units to render them non-hazardous, are the wastes managed as restricted until 40 CFR Part 268 treatment standards are met?* [40 CFR 268.9(d)]

Yes ___ No ___ NA ___

*This applies to both concentration based treatment standards specified in 40 CFR 268.41 and 268.43, and to some 40 CFR 268.42 required methods which result in treatment below the characteristic level. See Appendix D.

3. Off-Site Management: Waste Exceeds Treatment Standards

Are wastes that exceed treatment standards/prohibition levels (not subject to a national capacity variance) shipped to an off-site treatment or storage facility?

Yes ___ No ___ (If No, go to 4.)

Identify wastes code(s) and off-site treatment or storage facilities to which wastes are shipped.

Waste Code	Receiving Facility
___	_____
___	_____
___	_____

Are LDR notifications provided for each shipment to the treatment or storage facility? [40 CFR 268.7(a)(1)]

Yes ___ No ___ (If No, go to 4.)

If alternative treatment standards are specified for lab packs, is the certification required in 40 CFR 268.7(a)(7) or (8) included with the notification?

Yes ___ No ___ NA ___

4. Off-Site Management: Wastes Meets Treatment Standards

a. Are wastes that meet treatment standards/prohibition levels shipped to an off-site disposal facility?

Yes ___ No ___ (If No, go to 5.)

Identify waste code(s) and off-site disposal facilities:

Waste Code	Receiving Facility
_____	_____
_____	_____
_____	_____

Are LDR notifications and certifications provided for each shipment to the disposal facility? [40 CFR 268.7(a)(2)(i) and 268.7(a)(2)(ii)]?

Yes ___ No ___ (If No, go to b.)

b. Are characteristic wastes which have been rendered non-hazardous (in a RCRA exempt unit) shipped to a Subtitle D facility?

Yes ___ No ___ NA ___ (If No or NA, go to 5.)

Complete the following table:

Waste Code	Receiving Facility
_____	_____
_____	_____
_____	_____

Are a notification and a certification for each shipment sent to the Regional Administrator or authorized State? [40 CFR 268.9(d)(1) amd 268.7(b)(5)?

Yes ___ No ___

5. Off-Site Management: Wastes Subject to Variances, Extensions, or Petitions

a. Are wastes that are subject to a national capacity variance (40 CFR Part 268, Subpart C) or a case-by-case extension (40 CFR 268.5) shipped to a treatment, storage, or disposal facility?

Yes ___ No ___ (If No, go to 6.)

Complete the following table:

Waste Code	Receiving Facility
_____	_____
_____	_____
_____	_____

b. Are LDR notifications (stating that the waste is not prohibited from land disposal) provided for each shipment to the off-site receiving facility. [40 CFR 268.7(a)(3)]

Yes ___ No ___

5. Dilution Prohibition [40 CFR 268.3]:

a. Are prohibited* wastes with different treatment standards mixed?

*See Appendix E for distinction between restricted and prohibited wastes.

Yes ___ No ___ (If No, go to b.)

List the wastes _____

Are the wastes amenable to the same type of treatment? [55 FR 22666]

Yes ___ No ___

Comments _____

b. Are prohibited wastes diluted to meet treatment standard criteria, or render them non-hazardous? [55 FR 22665-22666]

Yes ___ No ___ (If No, go to c.)

Check appropriate category:

___ Dilutes to meet treatment standards
___ Dilutes to render waste non-hazardous

Do wastes fall into the following categories? (Check if appropriate.) [40 CFR 268.3(b)]

___Managed in treatment systems regulated under the Clean Water Act
___Non-toxic* characteristic wastes
___Treatment standard specified in 40 CFR 268.41 or 268.43

*Non-toxic = D001 (except high TOC nonwastewaters), D002, and D003 (except cyanides and sulfides). [55 FR 22666]

If the wastes do not fall into the above categories, briefly describe the conditions under which they were diluted.

_____
_____
_____

c. Based on an assessment of points a. and b., and any other relevant circumstances, are prohibited wastes diluted as a substitute for adequate treatment? [40 CFR 268.3(a)]

Yes ___ No ___

Comments_____

H. Additional Comments, Concerns, or Issues Not Addressed in the Checklist:

_____
_____
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Illinois Environmental Protection Agency
Division of Land Pollution Control

RCRA INSPECTION REPORT

USEPA #: IL DD415505562	IEPA #: 1928030004
Facility Name: UNO-VEN	Phone #: 708/257-7761
Street Address: 135th & New Ave	County: Will
City: Lemont	State: Illinois Zip: 60439
Region: MAYWOOD	Inspection Date: 09/28/92 From: 8:30AM To: 9:45AM
Weather: 65°F Sunny	

TYPE OF FACILITY

Notified As: G, T, D Regulated As: G, T, D

LDF? Y (Yes or No) HPV? N 90-Day F/U Required?: YES ____ NO ✓

TYPE OF INSPECTION

CEI: ____ Sampling: ____ Citizen Complaint: ____ Closed: ____ Other: ____

CME/O&M: CME Record Review: ____ Follow-Up to Inspection of: ____ Withdrawal: ____

NON-REGULATED STATUS N/A

SQG: ____ Claimed Nonhandler: ____ Other (Specify in Narrative): ____

PART A

Notification Date: 07/28/80, from (initial) or (subsequent) Notification.

Initial Part A Date: 11/12/80 Amended: 03/09/82 9/18/90

Part A Withdrawal requested: __/__/__ N/A Approved by (US)(IL) EPA: __/__/__ N/A

PART B PERMIT APPLICATION

Part B Permit Submitted: (Y) or N 7-16-84 Final Permit Issued: __/__/__

ENFORCEMENT

Has the firm been referred to – USEPA: (Y) or N 08/5/86

Illinois Attorney General: Y or (N) __/__/__ County State's Attorney: Y or (N) __/__/__

ORDERS ISSUED

CACO: __/__/__ CAFO: 12/12/86 Consent Decree: __/__/__

Federal Court Order: __/__/__ State Court Order: __/__/__ IPCB Order: __/__/__

TSD FACILITY ACTIVITY SUMMARY

Activity by Process Code	On Part A?	Activity Conducted Prior to 1980?	Was Activity Ever Done?	Closed	Being done at Time of Insp.?	Exempt per 35 IAC, Sec.	On Annual Report 19	19	19

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2 OCT 1992
IEPA/DLPC

IL 532-1834

OWNER		OPERATOR	
Name	UNO-VEN	Name	UNO-VEN
Address	135th & New Ave	Address	135th & New Ave
City	Lemont	City	Lemont
State	Illinois	State	Illinois
Zip	60439	Zip	60439
Phone #	708/252-7261	Phone #	708/252-7261

PERSON(S) INTERVIEWED	TITLE	PHONE #
Lee Erchull	Env. Science Analyst	708/252-7261

INSPECTION PARTICIPANT(S)	AGENCY/TITLE	PHONE #
Gino Brun	IEPA/EPS	708/531-5900

PREPARED BY	AGENCY/TITLE	PHONE #
Gino Brun	IEPA/EPS	708/531-5900

SUMMARY OF APPARENT VIOLATIONS

Area	Class	Section

Area	Class	Section

Area	Class	Section

UNO-Ven
1978030004
September 28, 1992

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OFFICE OF RCRA
WASTE MANAGEMENT DIVISION
EPA, REGION V

NARRATIVE

On September 28, 1992, I conducted a CME inspection at UNO-VEN. I met with Lee Erchull (UNO-VEN).

UNO-VEN is a petroleum refinery which processes crude oil into finished petroleum products. This site is currently regulated as a hazardous waste generator/treatment/disposal facility.

IEPA REGULATED LAND DISPOSAL UNITS

Surface Impoundment - S04

API separator sludge K051 was stored in a 3.2 acre area from 1980 to 1981. This area has gone through RCRA closure. The closure inspection was conducted on April 13, 1987.

Land Application Area - D81

Four land application units were used to land apply K051 - API separator sludge from November 1980 to September 1981. Presently, non-hazardous waste is applied to the southwest land application area.

A closure plan for the four land application areas was approved on August 31, 1988. Phase I sampling activities have been completed. UNO-VEN submitted a 1989 closure modification request in October 1989 which was rejected by the Permit Section. Per Kevin Lesko (IEPA Permit Section), no further action has taken place regarding the closure of the land application areas.

USEPA REGULATED LAND DISPOSAL UNIT

Surface Impoundment - T02

This land disposal unit consists of two surface impoundments which was used as a storm water retention basin. These units excepted process water prior to 1990. Presently, the impoundments receive storm water and non-contact water. When the new TC rule came into effect, the dredgings became a regulated hazardous waste (D018). A closure plan (submitted to the USEPA, dated June 27, 1991) was approved to close the impoundments. Closure activities must be completed by April 10, 1992. Presently, microbes are being added to the impoundments to biologically treat the organic constituents in water and sludge.

These impoundments are regulated by the USEPA because of the new TC rule.

The IEPA does not have final authorization under HSWA.

GROUNDWATER MONITORING SYSTEM FOR THE LAND APPLICATION AREAS

The uppermost aquifer consists of two stratigraphic units that are hydraulically connected. These units are the lower part of the Lemont Drift and the underlying Silurian Dolomite bedrock.

The groundwater monitoring system consists of six stainless steel monitoring wells (UA-1 through UA-6) in the upper part of the Lemont Drift. Eighteen piezometers (B-1 through B-18) are used to gather groundwater elevations. Groundwater flow is towards the north west.

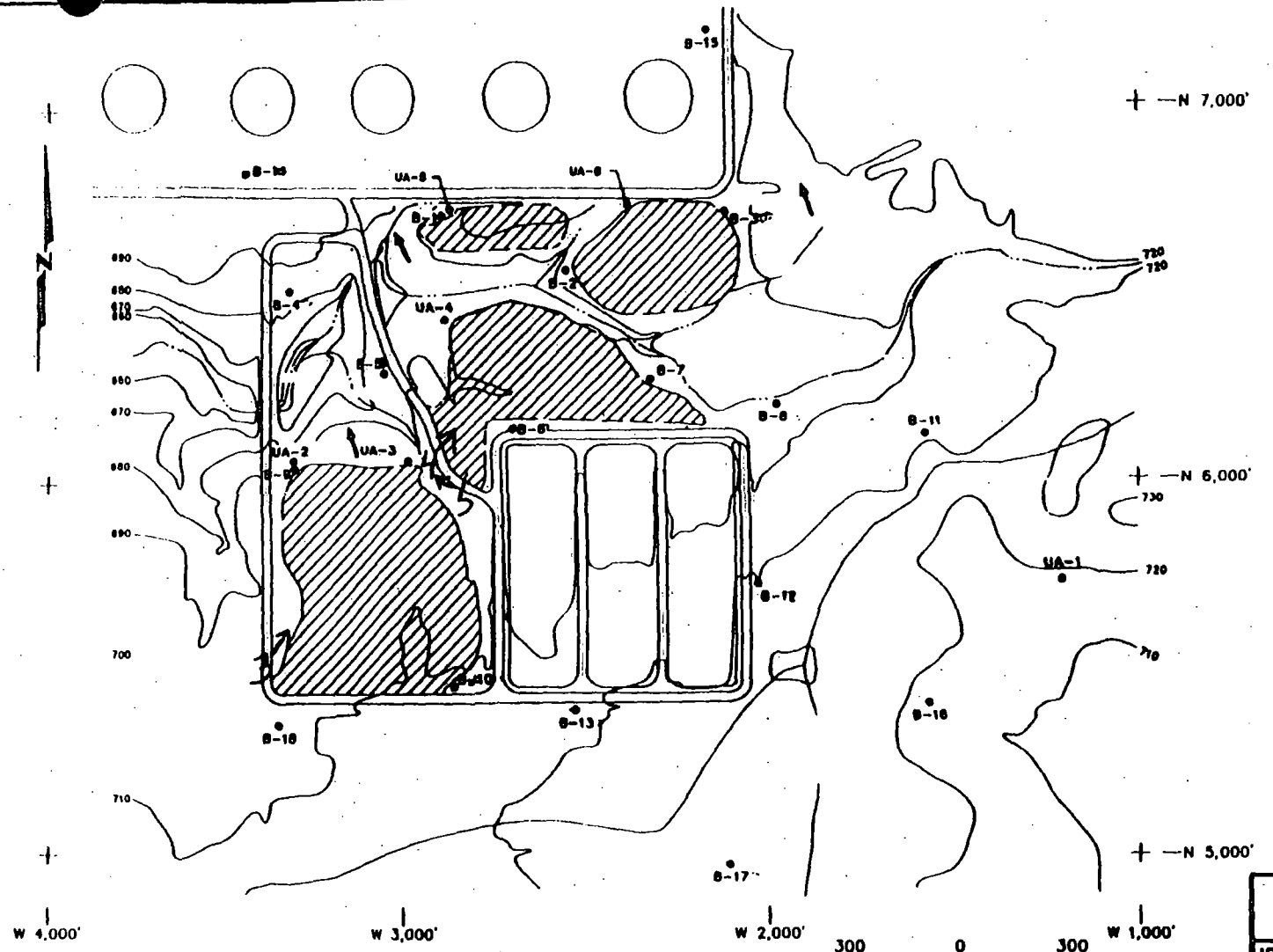
GROUNDWATER MONITORING SYSTEM FOR THE SURFACE IMPOUNDMENTS (T02)

The uppermost aquifer consists of Silurian Dolomite bedrock.

The groundwater monitoring system consists of five stainless steel bedrock wells, thirteen bedrock piezometers, and three staff gauges located in the NW storm water basin, treated water basin, and I & M Canal. Groundwater tends to flow in to the impoundments.

UNO-VEN and the USEPA entered a CAFO on December 17, 1986 and a penalty of $7,800 was paid on November 9, 1987. UNO-VEN appears to have complied with the December 17, 1986 CAFO.

During the CME, no apparent violations were observed.



LEGEND

STORAGE TANKS

LAND TREATMENT AREAS

700

TOPOGRAPHIC CONTOUR
MEAN SEA LEVEL DATUM
CONTOUR INTERVAL = 10 FEET

INTERMITTENT DRAINAGE WAY

TOPOGRAPHIC DRAINAGE DIVIDE

DIRECTION OF GROUNDWATER MOVEMENT

B-1

BEDROCK PIEZOMETER

UA-1

NEW STAINLESS STEEL MONITOR WELL

N 5,000'

000'
ORDINATES

300 0 300

SCALE IN FEET
1 INCH = 300 FEET

NOTE
THE NEW GROUNDWATER MONITORING SYSTEM (GMS) CONSISTS OF SIX (6) NEW GROUNDWATER QUALITY MONITOR WELLS IN THE UPPER PART OF THE UPPERMOST AQUIFER (LEMONT DRIFT) AND EIGHTEEN (18) EXISTING PIEZOMETERS (WATER-LEVEL MEASUREMENT PIEZOMETERS) IN THE LOWER PART OF THE UPPERMOST AQUIFER (SILURIAN BEDROCK).

FIGURE 2-1

ENSR™
ENSR CONSULTING AND ENGINEERING

UPPERMOST AQUIFER GROUNDWATER MONITORING SYSTEM
UNO-VEN CHICAGO REFINERY
LAND TREATMENT FACILITY

DRAWN: EDH	DATE: 12/19/89	PROJECT NUMBER: 6940-020	REV. 1
APPVD: X	REVISED: X		

6941\6941007A 2/22/91

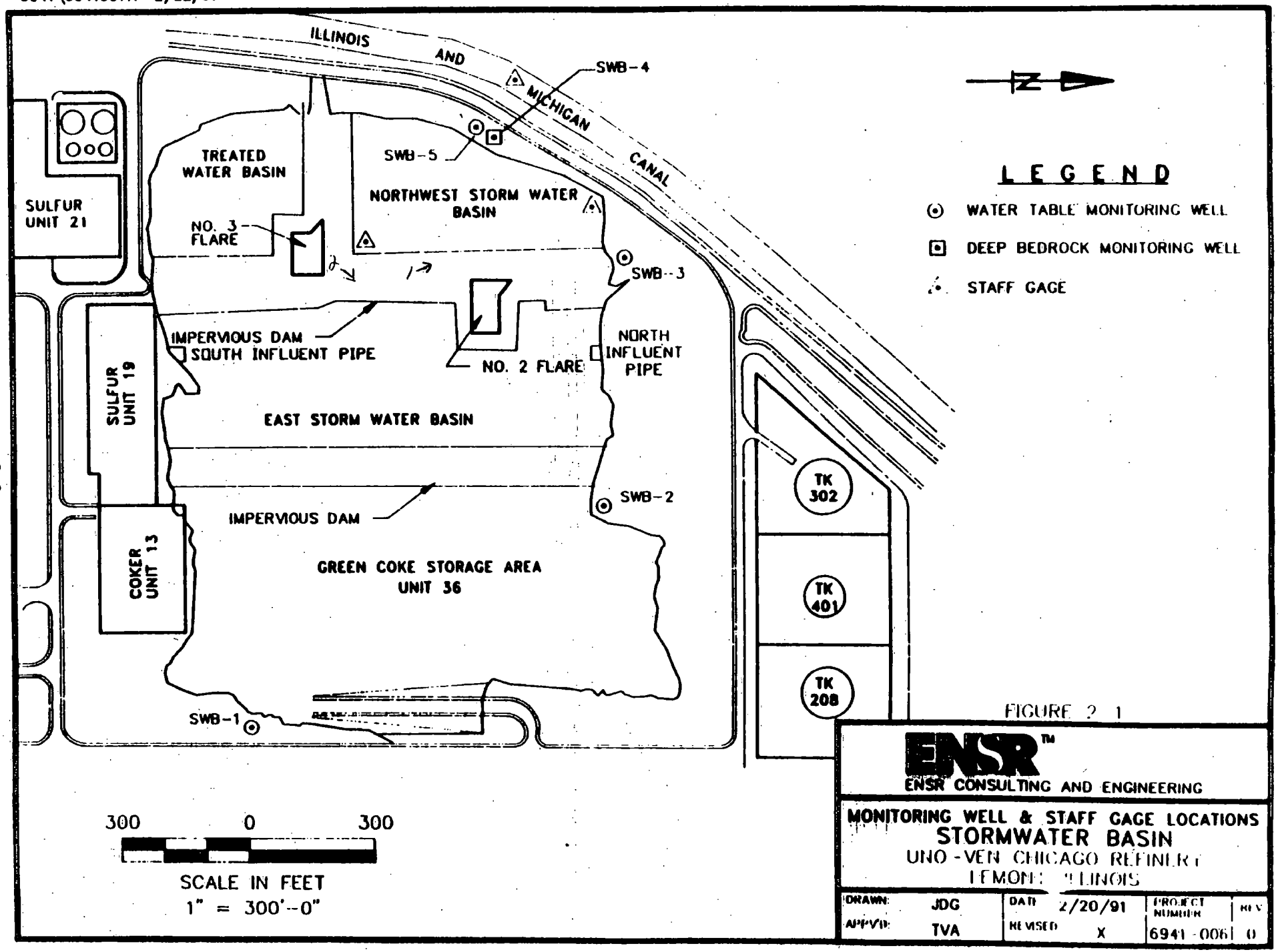


FIGURE 2-1

Illinois Environmental Protection Agency Photographs

Site Name: UNO-VEN IEPA #: 1978030004

Date: 9-28-92 Time: 8:30AM - 9:45AM Photographer By: Gino Bruni

Comments: NW Storm Water Basin TO2

Roll #: 93-81 Photo #: 1

Comments: East Storm Water Basin TO2

Roll #: 93-81 Photo #: 2

Illinois Environmental Protection Agency Photographs

Site Name: UNO-VEN IEPA #: 1978030004

Date: 9-28-92 Time: 8:30AM - 9:45AM Photograph By: Gino Bruni

Comments: Landfarm - West Plot

Roll #: 93-81 Photo #: 3

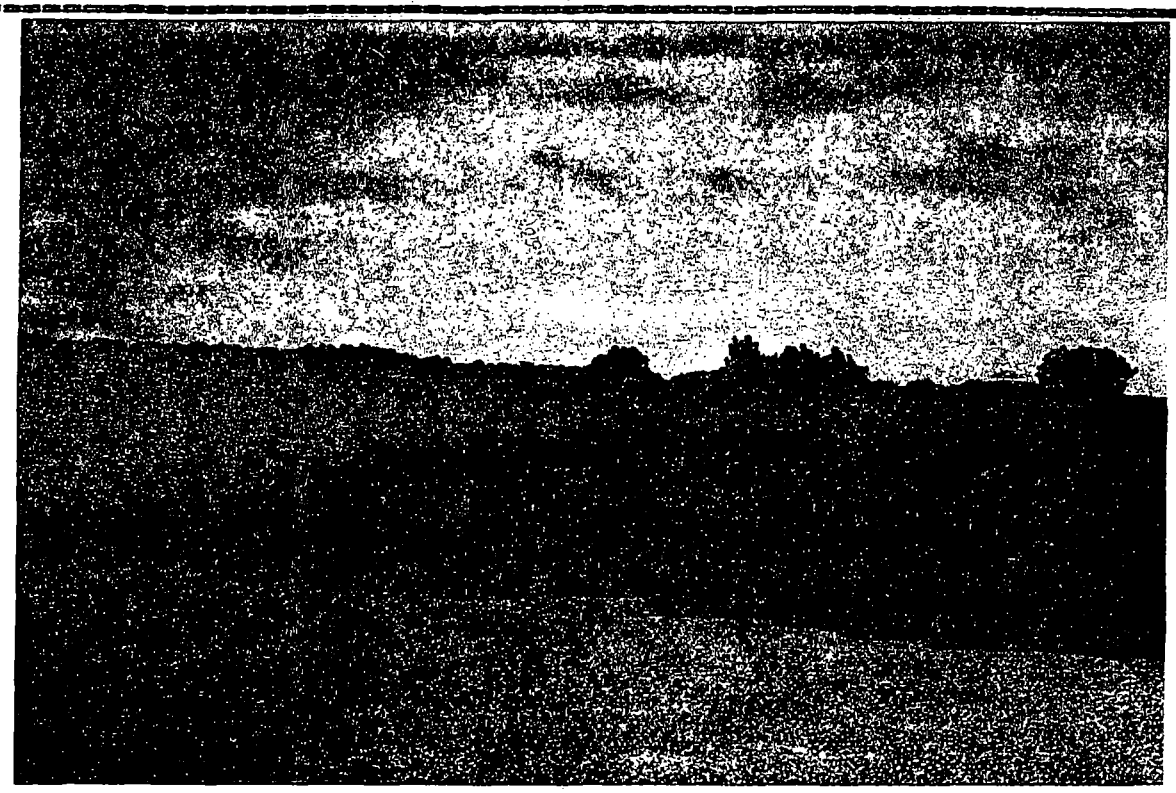
Comments: Landfarm see site sketch

Roll #: 93-81 Photo #: 4

Illinois Environmental Protection Agency Photographs

Site Name: UNO-VEN IEPA #: 1978030004

Date: 9-28-92 Time: 8:30AM - 9:45AM Photograph By: Gino Bruni



Comments: Closed Surface Impoundment 504

Roll #: 93-81 Photo #: 5

Comments:

Roll #: 93-81 Photo #:

APPENDIX A

COMPREHENSIVE GROUND-WATER MONITORING EVALUATION WORKSHEET

The following worksheets have been designed to assist the enforcement officer/ technical reviewer in evaluating theground-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.

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

	Y/N
B. Evaluation of the Owner/Operator's Hydrogeologic Assessment	
1. Did the owner/operator use the following direct techniques in the hydrogeologic assessment:	N/A
a. Logs of the soil borings/rock corings (documented by a professional geologist, soil scientist, or geotechnical engineer)?	Y
b. Materials tests (e.g., grain size analyses, standard penetration tests, etc.)?	Y
c. Piezometer installation for water level measurments at different depths?d. Slug tests?	N
e. Pump tests?	Y
f. Geochemical analyses of soil samples?	Y
g. Other (specify) (e.g., hydrochemical diagrams and wash analysis)	N
2. Did the owner/operator use the following indirect technique to supplement direct techniques data:	N/A
a. Geophysical well logs?	N
b. Tracer studies?	N
c. Resistivity and/or electromagnetic conductance?	N
d. Seismic Survey?	N
e. Hydraulic conductivity measurements of cores?	N
f. Aerial photography?	N
g. Ground penetrating radar?	N
h. Other (specify)	N
3. Did the owner/operator document and present the raw data from the site hydrogeologic assessment?	Y
4. Did the owner/operator document methods (criteria) used to correlate and analyze the information?	Y
5. The owner/operator prepare the following:	
a. Narrative description of geology?	Y
b. Geologic cross sections?	Y
c. Geologic and soil maps?	N
d. Boring/coring logs?	Y
e. Structure contour maps of the differing water bearing zones and confining layer?	Y
f. Narrative description and calculation of ground-water flows?	Y

	Y/N
g. Water table/potentiometric map?	Y
h. Hydrologic cross sections?	Y
6. Did the owner/operator obtain a regional map of the area and delineate the facility?	Y
If yes, does this map illustrate: a. Surficial geology features?	Y
b. Streams, rivers, lakes, or wetlands near the facility?	Y
c. Discharging or recharging wells near the facility?	N
7. Did the owner/operator obtain a regional hydrogeologic map?	N
If yes, does this hydrogeologic map indicate: a. Major areas of recharge/discharge?	N
b. Regional ground-water flow direction?	N
c. Potentiometric contours which are consistent with observed water level elevations?	N
8. Did the owner/operator prepare a facility site map?	Y
If yes, does the site map show: a. Regulated units of the facility (e.g., landfill areas,impoundments)?	Y
b. Any seeps, springs, streams, ponds, or wetlands?	Y
c. Location of monitoring wells, soil borings, or test pits?	Y
d. How many regulated units does the facility have? 4 land Application units	
If more than one regulated unit then, • Does the waste management area encompass all regulated units?	Y
• Is a waste management area delineated for each regulated unit?	N
C. Characterization of Subsurface Geology of Site 1. Soil boring/test pit program:	N/A
a. Were the soil borings/test pits performed under thesupervision of a qualified professional?	Y
b. Did the owner/operator provide documentation for selecting the spacing for borings?	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?	N
d. Indicate the method(s) of drilling: Auger, & Mud rotary	N/A

	Y/N
Auger (hollow or solid stem) ✓ Mud rotary ✓ Reverse rotary ___ Cable tool ___ Jetting ___ Other (specify) ___	N/A
e. Were continuous sample corings taken?	Y
f. How were the samples obtained (checked method[s]) • Split spoon ✓ • Shelby tube, or similar ✓ • Rock coring ✓ • Ditch sampling ___ • Other (explain) ___	N/A
g. Were the continuous sample corings logged by a qualified professional in geology?	Y
h. Does the field boring log include the following information:	
• Hole name/number?	Y
• Date started and finished?	Y
• Driller's name?	Y
• Hole location (i.e., map and elevation)?	Y
• Drill rig type and bit/auger size?	Y
• Gross petrography (e.g., rock type) of each geologic unit?	Y
• Gross mineralogy of each geologic unit?	Y
• 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
• Development of soil zones and vertical extent and description of soil type?	Y
• Depth of water bearing unit(s) and vertical extent of each?	Y
• Depth and reason for termination of borehole?	Y
• Depth and location of any contaminant encountered in borehole?	Y
• Sample location/number?	Y
• Percent sample recovery?	Y
• Narrative descriptions of: —Geologic observations?	Y
—Drilling observations?	Y
i. Were the following analytical tests performedon the core samples: • Mineralogy (e.g., microscopic tests and x-ray diffraction)?	Y
• Petrographic analysis: —degree of crystallinity and cementation of matrix?	Y
—degree of sorting, size fraction (i.e., sieving), textural variations?	Y
—rock type(s)?	Y

	Y/N
—soil type?	Y
—approximate bulk geochemistry?	Y
—existence of microstructures that may effect or indicate fluid flow?	Y
• Falling head tests?	Y
• Static head tests?	Y
• Settling measurements?	N
• Centrifuge tests?	N
• Column drawings?	N
D. Verification of Subsurface Geological Data	
1. Has the owner/operator used indirect geophysical methods to supplement geological conditions between borehole locations?	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 low water-bearing units?	N
3. Is the confining layer laterally continuous across the entire site?	N/A
4. Did the owner/operator consider the chemical compatibility of the site-specific waste types and the geologic materials of the confining layer?	Y
5. Did the geologic assessment address or provide means for resolution of any information gaps of geologic data?	Y
6. Do the laboratory data corroborate the field data for petrography?	Y
7. Do the laboratory data corroborate the field data for mineralogy and subsurface geochemistry?	Y
E. Presentation of Geologic Data	
1. Did the owner/operator present geologic cross sections of the site?	Y
2. Do cross sections:	
a. identify the types and characteristics of the geologic materials present?	Y
b. define the contact zones between different geologic materials?	Y
c. note the zones of high permeability or fracture?	Y
d. give detailed borehole information including:	N/A

	Y/N
• location of borehole?	Y
• depth of termination?	Y
• location of screen (if applicable)?	Y
• depth of zone(s) of saturation?	Y
• backfill procedure?	Y
3. Did the owner/operator provide a topographic map which was constructed by a licensed surveyor?	Y
4. Does the topographic map provide:	
a. contours at a maximum interval of two-feet?	Y
b. locations and illustrations of man-made features (e.g., parking lots, factory buildings, drainage ditches, storm drain, pipelines, etc.)?	Y
c. descriptions of nearby water bodies?	Y
d. descriptions of off-site wells?	Y
e. site boundaries?	Y
f. individual RCRA units?	Y
g. delineation of the waste management area(s)?	Y
h. well and boring locations?	Y
5. Did the owner/operator provide an aerial photograph depicting the site and adjacent off-site features?	Y
6. Does the photograph clearly show surface water bodies, adjacent municipalities, and residences and are these clearly labelled?	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
b. Were the well water level measurements taken within a 24 hour period?	Y
c. Were the well water level measurements taken to the nearest 0.01 feet?	Y
d. Were the well water levels allowed to stabilize after construction and development for a minimum of 24 hours prior to measurements?	Y
e. Was the water level information obtained from (check appropriate one):	
• multiple piezometers placed in single borehole? ____	
• vertically nested piezometers in closely spaced separate ____	N/A
• boreholes? ____	
• monitoring wells? ✓	

	Y/N
f. Did the owner/operator provide construction details for the piezometers?	Y
g. How were the static water levels measured (check method[s]). • Electric water sounder ✓ • Wetted tape ___ • Air line ___ • Other (explain) Fiberglass Tape measure	N/A
h. Was the well water level measured in wells with equivalent screened intervals at an equivalent depth below the saturated zone?	Y
i. Has the owner/operator provided a site water table (potentiometric) contour map?	Y
If yes, • Do the potentiometric contours appear logical and accurate based on topography and presented data? (Consult water level data)	Y
• Are ground-water flow-lines indicated?	Y
• Are static water levels shown?	Y
• Can hydraulic gradients be estimated?	Y
j. Did the owner/operator develop hydrologic cross sections of the vertical flow component across the site using measurements from all wells?	Y
k. Do the owner/operator's flow nets include: • piezometer locations?	Y
• depth of screening?	N
• width of screening?	N
• measurements of water levels from all wells and piezometers?	Y
2. Seasonal and temporal fluctuations in ground-water a. Do fluctuations in static water levels occur? If yes, are the fluctuations caused by any of the following:	Y
—Off-site well pumping	N
—Tidal processes or other intermittent natural variations (e.g., river stage, etc.)	N
—On-site well pumping	N
—Off-site, on-site construction or changing land use patterns	N
—Deep well injection	N
—Seasonal variations	Y
—Other (specify) ___	N
b. Has the owner/operator documented sources and patterns that contribute to or affect the ground-water patterns below the waste management?	Y
c. Do water level fluctuations alter the general ground-water gradients and flow directions?	N
d. Based on water level data, do any head differentials occur that may indicate a vertical flow component in the saturated zone?	N

	Y/N
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?	N
3. Hydraulic conductivity a. How were hydraulic conductivities of the subsurface materials determined?	Y
• Single-well tests (slug tests)?	N
• Multiple-well tests (pump tests)	Y
• Other (specify) _____	N
b. If single-well tests were conducted, was it done by:	
• Adding or removing a known volume of water?	Y
• Pressurizing well casing?	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?	N
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?	N
e. Is the owner/operator's slug test data (if applicable) consistent with existing geologic information (e.g., boring logs)?	N/A
f. Were other hydraulic conductivity properties determined?	Y
g. If yes, provide any of the following data, if available: • Transmissivity ✓ see contractor reports. • Storage coefficient ____ • Leakage ____ • Permeability ✓ • Porosity ____ • Specific capacity ____ • Other (specify) _____	N/A
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
• Are soil boring/test pit logs included?	Y
• Are geologic cross-sections included?	Y
b. Is there evidence of confining (competent, unfractured, continuous, and low permeability) layers beneath the site? If yes,	Y
• how was continuity demonstrated? 18 bore holes cored into bedrock	N/A
c. What is hydraulic conductivity of the confining unit (if present)? CM/Sec How was it determined? $1 \times 10^{-6} - 1 \times 10^{-8}$ laboratory testing of core samples	N/A

	Y/N
d. Does potential for other hydraulic communication exist (e.g., lateral inconnnuity between geologic units, facies changes, fracture zones, cross cutting structures, or chemical corrosion/alteration of geologic units by leachage? If yes or no, what is the rationale? Supplemental Hydrogeologic Investigation 1) Soil & Bedrock Boreholes 2) Bedrock Piezometers 3) GW level measurements	Y
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? • Hollow-stem auger ☒ • Solid-stem auger ☒ • Mud rotary ☒ • Air rotary ☐ • Reverse rotary ☐ • Cable tool ☐ • Jetting ☐ • Air drill w/ casing hammer ☐ • Other (specify) _____	N/A
b. Were any cutting fluids (including water) or additives used during drilling? If yes, specify: • Type of drilling fluid H_2O • Source of water used well • Foam _____ • Polymers _____ • Other _____	Y
c. Was the cutting fluid, or additive, identified?	Y
d. Was the drilling equipment steam-cleaned prior to drilling the well? • Other methods _____	Y
e. Was compressed air used during drilling? If yes, • was the air filtered to remove oil?	N
f. Did the owner/operator document procedure for establishing the potentiometric surface? If yes, • how was the location established? Piezometers, Monitoring Wells, and Boreholes.	Y
g. Formation samples	N/A

	Y/N
• Were formation samples collected initially during drilling?	Y
• Were any cores taken continuous?	Y
• If not, at what interval were samples taken? 5' original/y	
• How were the samples obtained? ✓Split spoon —Shelby tube ✓Core drill —Other (specify)	N/A
• Identify if any physical and/or chemical tests were performed on the formation samples (specify) _____ _____ _____	N/A
2. Monitoring Well Construction Materials a. Identify construction materials (by number) and diameters (ID/OD) Material / Diameter • Primary Casing: PVC / 4" PVC • Secondary or outside casing (doubleconstruction): SS in All / 6" • Screen: PVC / 2" or 4"	N/A
b. How are the sections of casing and screen connected?	
• Pipe sections threaded	Y
• Couplings (friction) with adhesive or solvent	N
• Couplings (friction) with retainer screws	N
• Other (specify)	N/A
c. Were the materials steam-cleaned prior to installation? • If no, how were the materials cleaned? N/A	Y
3. Well Intake Design and Well Development a. Was a well intake screen installed?	Y
• What is the length of the screen for the well? 20' and 30'	N/A
• Is the screen manufactured?	Y
b. Was a filter pack installed?	Y
• What kind of filter pack was employed? SAND	N/A
• Is the filter pack compatible with formationmaterials?	Y
• How was the filter pack installed? Dropped	N/A

	Y/N
• What are the dimensions of the filter pack? 1' to 10' above screen	N/A
• Has a turbidity measurement of the well water ever been made?	N
• Have the filter pack and screen been designed for the insitu materials? _____	Y
c. Well development • Was the well developed?	Y
• What technique was used for well development? —Surge block —✓Bailer —Air surging —Water pumping —Other (specify) _____	N/A
4. Annular Space Seals a. What is the annular space in the saturated zone directlyabove the filter pack filled with: —✓Sodium bentonite (specify type and grit) pellets —✓Cement (specify neat or concrete) —Other (specify)	N/A
b. Was the seal installed by: —✓Dropping material down the hole and tamping —Dropping material down the inside of hollow-stem auger —Tremie pipe method —Other (specify)	N/A
c. Was a different seal used in the unsaturated zone? If yes,	N
• Was this seal made with? —Sodium bentonite (specify type and grit) —Cement (specify neat or concrete)- Other (specify)	N/A
• Was this seal installed by? —Dropping material down the hole and tamping —Dropping material down the inside of hollow stem auger —Other (specify)	N/A
d. Is the upper portion of the borehole sealed with a concrete cap to prevent infiltration from the surface?	Y
e. Is the well fitted with an above-ground protectivedevice and bumper guards?	N
f. Has the protective cover been installed with locks to prevent tampering?	Y

	Y/N
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
b. How far apart are the detection monitoring wells? 500' +	N/A
c. Does the owner/operator provide a rationale for thelocation of each monitoring well or cluster?	Y
d. Does the owner/operator identified the well screenlengths of each monitoring well or clusters?	Y
e. Does the owner/operator provide an explanation for the well screen lengths of each monitoring well orcluster?	Y
f. Do the actual locations of monitoring wells orclusters correspond to those identified by the owner/operator?	Y
2. Placement of Upgradient Monitoring Wells	
a. Has the owner/operator documented the location ofeach upgradient monitoring well or cluster?	Y
b. Does the owner/operator provide an explanation forthe location(s) of the upgradient monitoring wells?	Y
c. What length screen has the owner/operator employed inthe background monitoring well(s)? 20'	N/A
d. Does the owner/operator provide an explanation for the screen length(s) chosen?	Y
e. Does the actual location of each background monitoring well or cluster correspond to that identified by the owner/operator?	Y
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
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
2. Does the list of monitoring parameters include all hazardous waste constituents from the facility?	Y

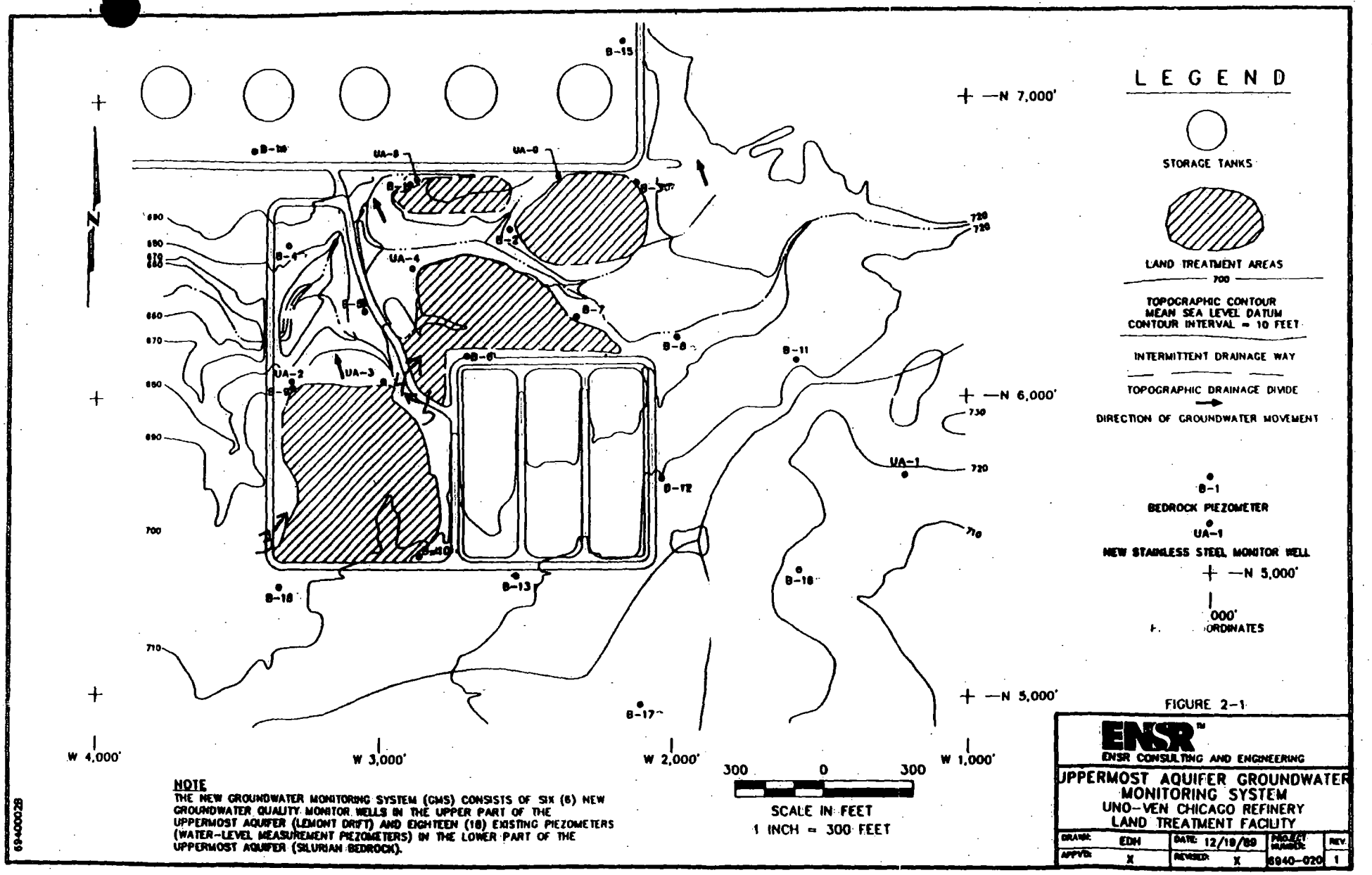
	Y/N
a. Does the water quality parameter list include other important indicators not classified as hazardous waste constituents?	Y
b. Does the owner/operator provide documentation for he listed wastes which are not included?	Y
3. Does the owner/operator's assessment plan specify the procedures to be used to determine the rate of constituent migration in the ground-water?	Y
4. Has the owner/operator specified a schedule of implementation in the assessment plan?	Y
5. Have the assessment monitoring objectives been clearly defined in the assessment plan?	Y
a. Does the plan include analysis and/or re-evaluation to determine if significant contamination has occurredin any of the detection monitoring wells?	Y
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
c. Does the plan call for determining the concentrations of hazardous wastes and hazardous waste constituentsin the ground water?	Y
d. Does the plan employ a quarterly monitoring program?	Y
6. Does the assessment plan identify the investigatory methods that will be used in the assessment phase?	Y
a. Is the role of each method in the evaluation fully described?	Y
b. Does the plan provide sufficient descriptions of the direct methods to be used?	Y
c. Does the plan provide sufficient descriptions of the indirect methods to be used?	Y
d. Will the method contribute to the further characterization of the contaminant movement?	Y
7. Are the investigatory techniques utilized in the assessment program based on direct methods?	Y
a. Does the assessment approach incorporate indirect methods to further support direct methods?	N
b. Will the planned methods called for in the assessment approach ultimately meet performance standards for assessment monitoring?	N
c. Are the procedures well defined?	Y
d. Does the approach provide for monitoring wells similar in design and construction as the detectionmonitoring wells?	N

	Y/N
e. Does the approach employ taking samples during drilling or collecting core samples for further analysis?	Y
8. Are the indirect methods to be used based on reliable and accepted geophysical techniques?	N/A
a. Are they capable of detecting subsurface changesresulting from contaminant migration at the site?	N/A
b. Is the measurement at an appropriate level of sensitivity to detect ground-water quality changes at the site?	N/A
c. Is the method appropriate considering the nature of the subsurface materials?	N/A
d. Does the approach consider the limitations of these methods?	N/A
e. Will the extent of contamination and constituent concentration be based on direct methods and sound engineering judgment? (Using indirect methods tofurther substantiate the findings.)	N/A
9. Does the assessment approach incorporate any mathe-matical modeling to predict contaminant movement?	N
a. Will site specific measurements be utilized toaccurately portray the subsurface?	N/A
b. Will the derived data be reliable?	N/A
c. Have the assumptions been identified?	N/A
d. Have the physical and chemical properties of the site-specific wastes and hazardous waste constituentsbeen identified?	N/A
J. Conclusions	
1. Subsurface geology	
a. Has sufficient data been collected to adequately define petrography and petrographic variation?	Y
b. Has the subsurface geochemistry been adequately defined?	Y
c. Was the boring/coring program adequate to definesubsurface geologic variation?	Y
d. Was the owner/operator's narrative description complete and accurate in its interpretation of the data?	Y
e. Does the geologic assessment address or provide means to resolve any information gaps?	Y
2. Ground-water flowpaths	
a. Did the owner/operator adequately establish the hori-zontal and vertical components of ground-water flow?	Y

	Y/N
b. Were appropriate methods used to establish ground-water flowpaths?	Y
c. Did the owner/operator provide accurate documentation?	Y
d. Are the potentiometric surface measurements valid?	Y
e. Did the owner/operator adequately consider the seasonal and temporal effects on the ground-water?	Y
f. Were sufficient hydraulic conductivity tests performed to document lateral and vertical variationin hydraulic conductivity in the entire hydrogeologic subsurface below the site?	Y
3. Uppermost Aquifer a. Did the owner/operator adequately define the upper-most aquifer?	Y
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?	N
b. Are the samples representative of ground-water quality?	N
c. Are the ground-water monitoring wells structurally stable?	Y
d. Does the ground-water monitoring well's design and construction permit an accurate assessment of aquifer characteristics?	N
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?	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?	N
6. Assessment Monitoring a. Has the owner/operator adequately characterized site hydrogeology to determine contaminant migration?	Y
b. Is the detection monitoring system adequately designed and constructed to immediately detect any contaminant release?	N

	Y/N
c. Are the procedures used to make a first determinationof contamination adequate?	Y
d. Is the assessment plan adequate to detect, characterize, and track contaminant migration?	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
f. Are the assessment monitoring wells adequately designed and constructed?	Y
g. Are the sampling and analysis procedures adequate to provide true measures of contamination?	Y
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
i. Are the data collected at sufficient frequency and duration to adequately determine the rate of migration?	Y
j. Is the schedule of implementation adequate?	Y
k. Is the owner/operator's assessment monitoring plan adequate?	N
• If the owner/operator had to implement hisassessment monitoring plan, was it implemented satisfactorily?	N
II. Field Evaluation *Field evaluation will be conducted at a later date. Omitting pages 17-24	
A. Ground-Water Monitoring System	
1. 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.)	
B. Monitoring Well Construction	
1. Identify construction material material diameter a. Primary Casing _____ b. Secondary or outside casing _____	
2. Is the upper portion of the borehole sealed with conrete to prevent infiltration from the surface?	
3. Is the well fitted with an above-ground protective device?	
4. Is the protective cover fitted with locks to prevent tampering? If a facility utilizes more than a single well design, answer the above questions for each well design?	

	Y/N
VIII. Conclusions	
A. Is the facilitycurrently operating under the correct monitoring progaram according to the statistical analyses performed by the current operator?	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?	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? To be determined at a later date.	N/A



NOTE
THE NEW GROUNDWATER MONITORING SYSTEM (GMS) CONSISTS OF SIX (6) NEW GROUNDWATER QUALITY MONITOR WELLS IN THE UPPER PART OF THE UPPERMOST AQUIFER (LEMONT DRIFT) AND EIGHTEEN (18) EXISTING PIEZOMETERS (WATER-LEVEL MEASUREMENT PIEZOMETERS) IN THE LOWER PART OF THE UPPERMOST AQUIFER (SILURIAN BEDROCK).

FIGURE 2-1

ENSR™
ENSR CONSULTING AND ENGINEERING

UPPERMOST AQUIFER GROUNDWATER MONITORING SYSTEM
UNO-VEN CHICAGO REFINERY
LAND TREATMENT FACILITY

DRAWN: EDH	DATE: 12/18/89	PROJECT NUMBER: 6940-020	REV. 1
APPVD: X	REVISED: X		

6941\6941007A 2/22/91

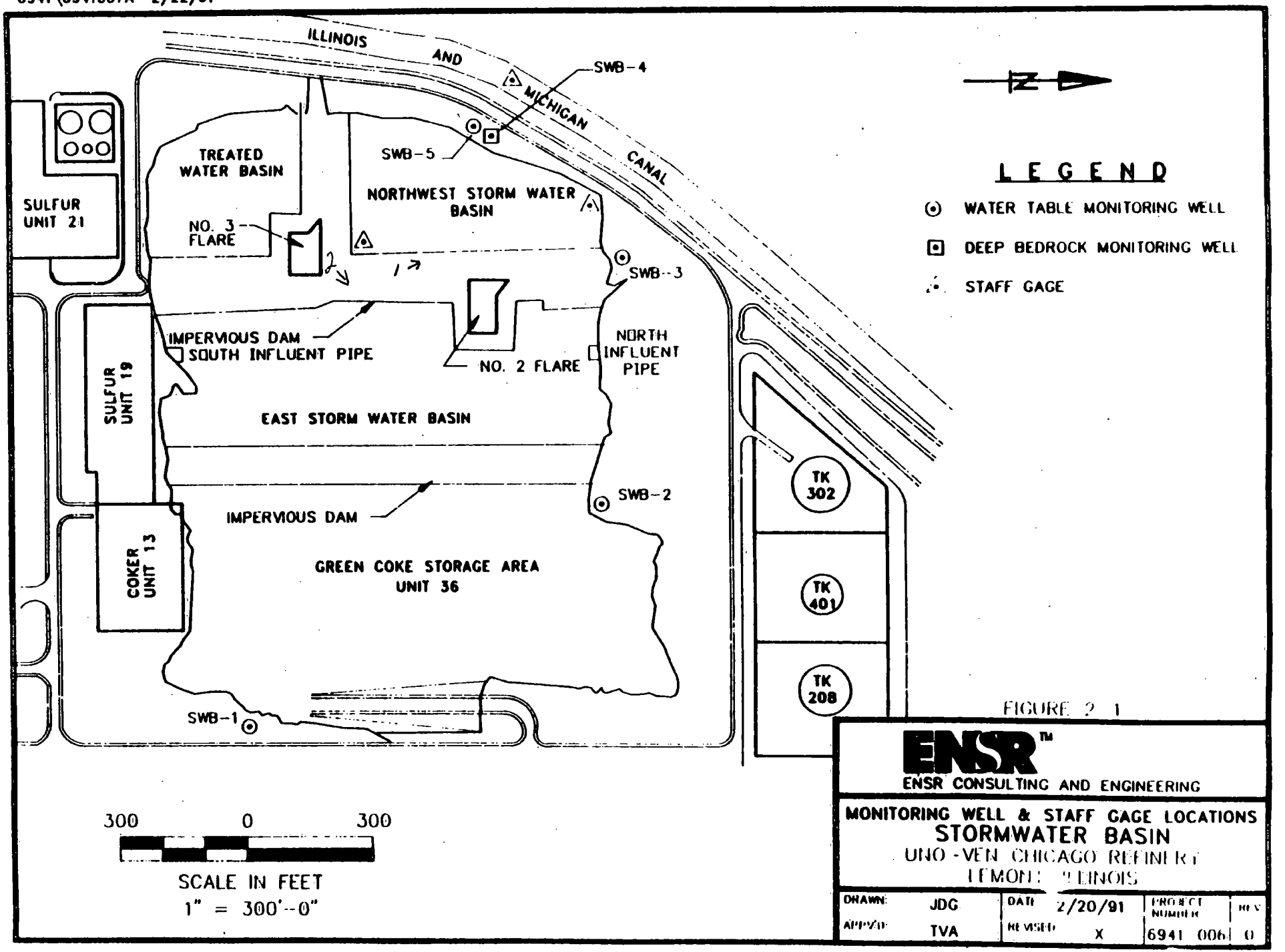


FIGURE 2-1

TABLE 2-1

UA-SERIES MONITOR WELL DETAILS
UNO-VEN CHICAGO REFINERY
LAND TREATMENT FACILITY

Monitor Well Number	T.O.C.[2] Elevation (ft)	Stick Up (ft)	Depth[1] to Top of (ft)				Depth[1] to Bottom of (ft)		
			Cement Grout Seal	Bentonite Pellet Seal	Sand Pack	Well Screen	Well Screen	Tail Pipe	Borehole
UA-1	718.80	2.5	5 to 6	89.1	90.5	92.5	102.5	104.4	104.4
UA-2	692.24	2.5	5 to 6	65.5	67.6	70.0	80.0	81.9	82.0
UA-3	697.73	2.8	5 to 6	70.1	72.2	74.7	84.7	86.6	86.6
UA-4	695.98	2.9	5 to 6	68.5	70.0	72.1	82.1	84.0	84.0
UA-5	694.84	2.9	5 to 6	67.7	69.7	72.1	87.1	89.0	95.5[3]
UA-6	701.76	3.5	5 to 6	75.0	77.0	79.0	89.0	90.9	91.0

1 Depth below ground surface.
2 T.O.C. = Top of 2-inch stainless steel riser pipe (casing).
3 UA-5 was backfilled with bentonite from 95.5 to 90 feet (top of bottom seal is at 90 feet).

TABLE 2-1

UA-SERIES MONITOR WELL DETAILS
UNO-VEN CHICAGO REFINERY
LAND TREATMENT FACILITY

Monitor Well Number	T.O.C.[2] Elevation (ft)	Stick Up (ft)	Depth[1] to Top of (ft)				Depth[1] to Bottom of (ft)		
			Cement Grout Seal	Bentonite Pellet Seal	Sand Pack	Well Screen	Well Screen	Tail Pipe	Borehole
UA-1	718.80	2.5	5 to 6	89.1	90.5	92.5	102.5	104.4	104.4
UA-2	692.24	2.5	5 to 6	65.5	67.6	70.0	80.0	81.9	82.0
UA-3	697.73	2.8	5 to 6	70.1	72.2	74.7	84.7	86.6	86.6
UA-4	695.98	2.9	5 to 6	68.5	70.0	72.1	82.1	84.0	84.0
UA-5	694.84	2.9	5 to 6	67.7	69.7	72.1	87.1	89.0	95.5[3]
UA-6	701.76	3.5	5 to 6	75.0	77.0	79.0	89.0	90.9	91.0

1 Depth below ground surface.
2 T.O.C. = Top of 2-inch stainless steel riser pipe (casing).
3 UA-5 was backfilled with bentonite from 95.5 to 90 feet (top of bottom seal is at 90 feet).

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WMD RCRA
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Compliance

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OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION V

Shad

Illinois Environmental Protection Agency
Division of Land Pollution Control

RCRA INSPECTION REPORT

[redacted]PA #: IL D041550567 | IEPA #: 1978030004

Facility Name: Uno-Ven Chicago Refinery | Phone #: 708-257-7761

Street Address: 135th + New Ave. | County: Will

City: Lemont | State: IL | Zip: 60439

Region: 2 | Inspection Date: 10/31/91 | From: 10:00 am To: 12:00 pm

Weather: 50° Cloudy

TYPE OF FACILITY

Notified As: G, Tr, D | Regulated As: G, D, (Tr), T

LDF? Y (Yes or No) HPV? N | 90-Day F/U Required?: YES ____ NO ✓

TYPE OF INSPECTION

CEI: ✓ Sampling: ____ Citizen Complaint: ____ Closed: ____ Other: ____

CME/O&M: ____ Record Review: ____ Follow-Up to Inspection of: ____ Withdrawal: ____

NON-REGULATED STATUS N/A

SQG: ____ Claimed Nonhandler: ____ Other (Specify in Narrative): ____

PART A

Notification Date: 8/15/80, from (initial) or (subsequent) Notification.

Initial Part A Date: 11/17/80 | Amended: 9/18/90

Part A Withdrawal requested: __/__/__ | Approved by (US)(IL) EPA: __/__/__

PART B PERMIT APPLICATION

Part B Permit Submitted: (Y) or N 7/16/84 | Final Permit Issued: __/__/__

ENFORCEMENT

Has the firm been referred to – USEPA: (Y) or N 8/5/86

Illinois Attorney General: Y or (N) __/__/__ County State's Attorney: Y or (N) __/__/__

ORDERS ISSUED

CACO: __/__/__ CAFO: 12/17/86 Consent Decree: __/__/__

Federal Court Order: __/__/__ State Court Order: __/__/__ IPCB Order: __/__/__

TSD FACILITY ACTIVITY SUMMARY

Activity by Process Code	On Part A?	Activity Conducted Prior to 1980?	Was Activity Ever Done?	Closed	Being done at Time of Insp.?	Exempt per 35 IAC. Sec.	On Annual Report 1988	1989	1990
D81 *	Y	Y	Y	N	N	N	N	N	N
S04**	Y	N	Y	Y	N	N	N	N	N
T04***	N	N	Y	N	Y	N	N	N	N

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* No haz-waste has been placed in LP since 1981

** Closed in 1987

*** Newly regulated unit due to TC Rule

SUMMARY OF APPARENT VIOLATIONS

OWNER		OPERATOR	
Name	Uno-Ven Chicago Refinery	Name	- same -
Address	135th + New Ave.	Address	
City	Lemont	City	
State	IL	State	
Zip	60439	Zip	
Phone #	708-257-7761	Phone #	

PERSON(S) INTERVIEWED	TITLE	PHONE #
Lee Erchall	Sr. Envir. Spec.	708-257-7761

INSPECTION PARTICIPANT(S)	AGENCY/TITLE	PHONE #
Tina Kovasznay	IEPA- EPS	708-531-5900

PREPARED BY	AGENCY/TITLE	PHONE #
- same -		

Area	Class	Section
LDR	II	728.107(a)(6)

Area	Class	Section

Area	Class	Section

RECEIVED
NOV 1994
IEPA/DLPC

Facility Name: Uno-Ven Chicago Refinery
USEPA #: IL D041550567
IEPA #: 1978030004

WASTE DISPOSITION FORM

Waste Name (include haz & 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 Report for: (Circle if present; cross out if not present) * 19 90	* 19 89	* 19 88	Amount on Site	Rate of Generation	Last Manifested Shipment	Disposition
Heat Exchange Solids	Clean out of heat exchange	6/25/88	K050	Y	Y	G F	G F	G F	none	6 cubic yds in 1990	7-25-91	Trade Wind Incineration, Sauget, IL
Contaminated Soil	From benzene spill	spring 1991	D018	N	N	~~G~~ F	~~G~~ F	~~G~~ F	none	one time generation -20 gal	7-25-91	Trade Winds Incineration, Sauget, IL
Paint waste	From painting of Tanks	spring 1991	D001	Y	Y	~~G~~ F	~~G~~ F	~~G~~ F	none	one time generation -255 gal	7-16-91	Heritage Environmental Services,
Storm Pond Dredgings	Dried sludge from treated wastewater	5/8/90	D018	N.	Y	~~G~~ F	~~G~~ F	~~G~~ F	none	varies 624 gal in 1991	6-11-91	Adams Center Landfill, Fort Wayne, IN
Sludge from WWTP	sedementation process in WWTP	Spring 1991	F038	N	N	~~G~~ F	~~G~~ F	~~G~~ F	none	5276 cu. yards in 1991	10-23-91	Chemical Waste Management, Cal. City, IL
Corrugated Separator Sludge	Clean out of Corrugated separator	Spring 1991	F037	N	N	~~G~~ F	~~G~~ F	~~G~~ F	none	45 yds in 1991	9-6-91	"
API Separator Sludge	Clean out of API sludge separator	6/20/88	K051	Y	Y	~~G~~ F	G F	G F	none	no longer generated	11-27-89	"
						G F	G F	G F				
						G F	G F	G F				
						G F	G F	G F				

* All "NO" responses must be explained in narrative.

NARRATIVE

Uno-Ven Corporation is a petroleum refinery which processes crude oil into finished petroleum products such as gasoline, fuel oils and other related products.

Hazardous Waste

Heat Exchange Solids - K050
- from cleaning and maintenance of heat exchangers
- generated approximately once a year, amount varies based on the number of units cleaned
- 6 cubic yards were generated in 1990
- last manifested shipment was on 7-25-91 to Trade Wind Incineration, Sauget, IL

API Separator Sludge - K051
- from cleaning of the oil/water separator
- no longer generated, since the change to corrugated separators
- 36 cubic yards were generated in 1989
- last manifested shipment was on 11-27-89 to Chemical Waste Management, Calumet City, IL

Storm Pond Dredgings - D018
- dried sludge from treated wastewater
- generation varies
- 624 gallons generated in 1991
- last manifested shipment was on 6-11-91 to Adams Center Landfill, Fort Wayne, IN

Corrugated Separator Sludge - F037
- from cleaning of the oil/water separator
- occurs as needed
- 45 cubic yards generated in 1991
- last manifested shipment was on 9-6-91 to Chemical Waste Management, Calumet City, IL

Sludge - F038
- from sedimentation process in wastewater treatment plant
- generation varies
- 5276 cubic yards generated in 1991
- last manifested shipment was on 10-23-91 to Chemical Waste Management, Calumet City, IL

Contaminated Soil - D018
- from a benzene spill
- one time occurrence
- 20 gallons generated
- manifested shipment on 7-25-91 to Trade Winds Incineration, Sauget, IL

Paint Waste - D001
- from painting of tanks
- one time occurrence
- 255 gallons generated
- manifested shipment on 7-16-91 to Heritage Environmental Services

Hazardous Waste Units

Land Application Area - D81

There are four land application units located on the facility's northeast side. API separator sludge (K051) was applied to these areas from November of 1980 to September of 1981. Currently, non-hazardous waste is applied to these areas. A closure plan for these area was approved on August 31, 1988. Per Lee Erchull, Phase 1 sampling activities for closure have been completed. Unocal is responsible for the closure of that area and have not made any decisions on when closure will be completed.

Surface Impoundment - S04

This is a 3.2 acre area also located on the facility's northeast side. API separator sludge (K051) was stored in this area in 1980-1981. This area has gone through RCRA closure. A closure inspection was conducted on 4-13-87 by Charles Gruntman of the IEPA. No hazardous waste has been stored in this area since closure. Currently, non-hazardous waste is stored in this area.

Surface Impoundment - T02

This is a Storm Water Retention Basin. All water except the oily water, the cooling water, and the solid water enter this basin. When the new TC Rule came into effect, the dredgings from the basin became a regulated waste (D018). A closure plan has been submitted and approved by the USEPA. Uno-Ven has begun segregating their process wastewater and storm water to facilitate RCRA closure of this basin.

<u>Hazardous Waste Accumulations Area</u>

A staging area is located on the south end of the plant. No hazardous waste was in this area at the time of the inspection.

From the information obtained during this inspection, it appears that Uno-Ven is a fully regulated generator, treatment, and disposal facility.

<u>Additional Notes</u>

Uno-Ven no longer accepts hazardous waste, however, due to the TC rule that went into effect; the storm pond dredging are now a D018 waste and are treated in a surface impoundment.

Last year's inspection (dated 10-17-90) indicated that the newly regulated unit was the surface impoundment (S04) which was closed in 1987. D018 sludge has never been placed in this closed unit. The newly regulated unit is the storm water basin (T02) as noted above.

Effective December 1, 1989, a change in ownership occurred forming a partnership with a Venezuelan Oil Company. The present name is Uno-Ven and their Part A is being amended to Show the change.

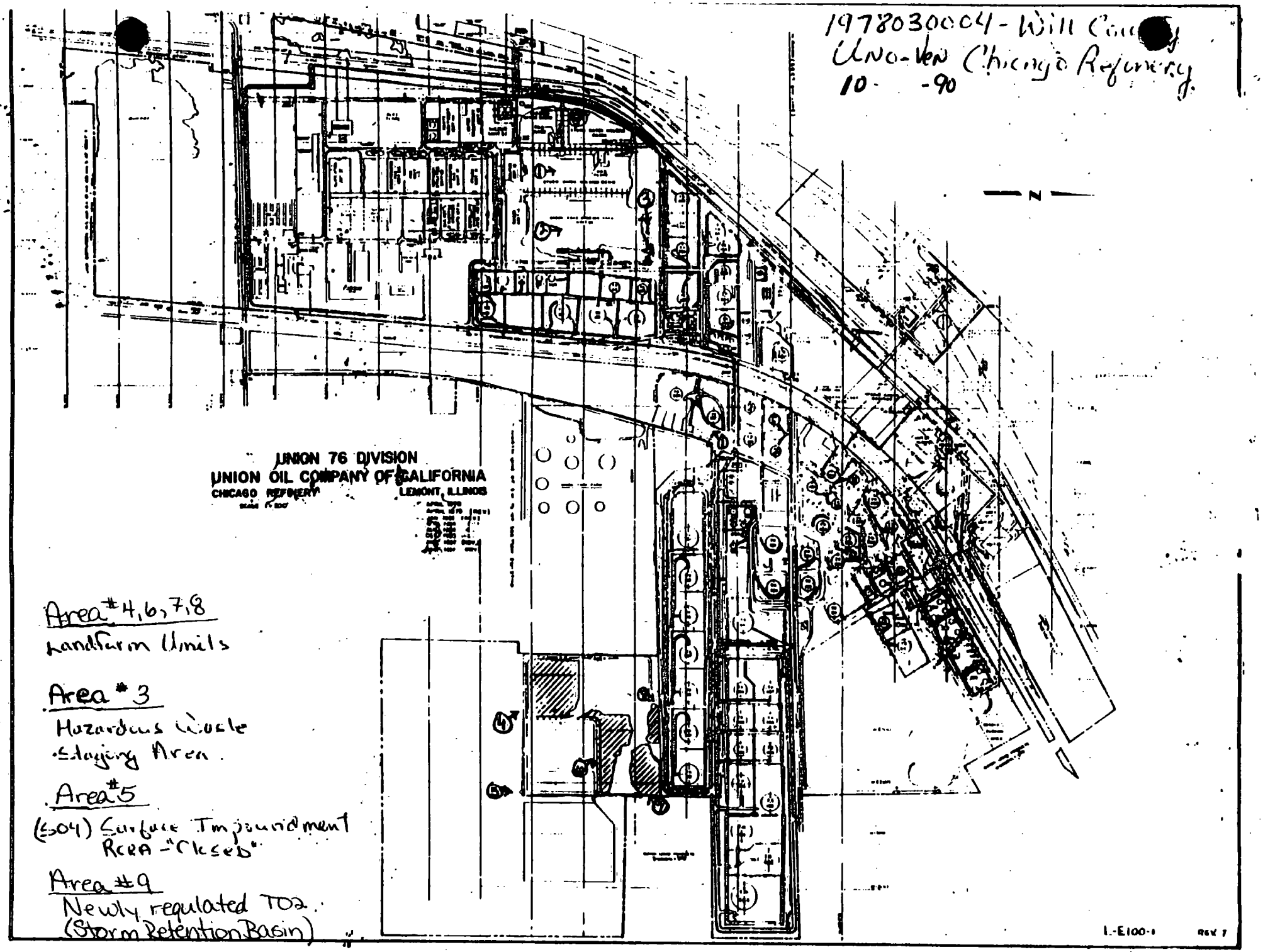
No photos accompany this inspection report due to camera malfunction. See photos from last year's inspection (dated October 17, 1990) if necessary.

Apparent Violations

728.107(a)(6) - Copies of Land Disposal Restriction Notices are not being kept on site.

Subparts F, G, & H were not addressed during the October 31, 1991 inspection.

1978030004 - Will County
Uno-Ven Chicago Refinery
10- -90



Area #4,6,7,8
Landfarm Units

Area #3
Hazardous Waste
Staging Area.

Area #5
(S04) Surface Impoundment
RCRA - "Closed"

Area #9
Newly regulated TOZ.
(Storm Retention Basin)

GEN/TSD/TRANS

RCRA LAND DISPOSAL RESTRICTIONS INSPECTION

I. General Information

Facility: Uno-Ven Chicago Refinery

U.S. EPA ID No.: ILD 041550567/1978030004

Street: 135th + New Ave

City: Lemont State: IL Zip: 60439

Telephone: 708-257-7761

Inspection Date: 10/3/91 Time: 10-12 (am/pm)

Weather Conditions: 50° Cloudy

	Name	Agency/Title	Telephone
Inspectors:	Tina Kovaszney	IEPA/ERS	708-531-5900
Facility Representatives:	Lee Erchull	Sr. Env. Spec.	708-257-7761

See Appendix B to determine which of the following LDR waste categories the facility manages:

	Generate	Transport	Treat	Store	Dispose
F001-F005 Solvents					
F020-F023 and F026-F028					
California List*					
First Third [40 CFR 268.10]					
Second Third [40 CFR 268.11]					
Third Third [40 CFR 268.12]	X		X		X

* See Appendix A

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INSPECTION SUMMARY

Processes That Generate LDR Wastes:

See attached narrative + waste disposition form

LDR Waste Management:

See attached narrative + waste disposition form.

Summary:

110 LDR notices kept on site.
728.107(a)(6)
See attached narrative

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EPA/DLPC

Signature: Gina Kovasznay

RCRA LAND DISPOSAL RESTRICTIONS INSPECTION

II. WASTE IDENTIFICATION

A. List waste codes which the facility handles in each of the following LDR categories*:

1. F001 through F005 spent solvents:

_____

2. F020-F023 and F026-F028 dioxin-containing wastes:

_____

3. California List Wastes (See Appendix A):

_____

4. First Third Wastes [40 CFR 268.10]:

_____

5. Second Third Wastes [40 CFR 268.11]:

_____

6. Third Third Wastes [40 CFR 268.12]**:
K050, D001, F039, F037,

*See Appendix B.
** Note: Effective 09/25/90, large quantity generators and TSDs are required to use the toxicity characteristic leaching procedure (TCLP) instead of the extraction procedure (EP) for determining the toxicity characteristic (TC). Small quantity generators must comply with this new requirement by 03/29/91. Wastes which exhibit TC, but do not exhibit EP, will be considered "newly identified" wastes. They will be regulated under 40 CFR Part 268 only after they are evaluated by U.S. EPA, even if they are characteristic for a constituent previously covered under the EP toxicity characteristic (55 FR 22531).

B. Waste Code Determination

1. Have all wastes been correctly identified for purposes of compliance with 40 CFR Part 268?*

Yes ✓ No___

If no, list below:

Assigned Classification	Correct Classification
_____	_____
_____	_____
_____	_____
_____	_____

*Areas of concern include: California List/waste categories with more stringent treatment standards; listed/characteristic; multi-source/single-source leachate; P and U waste codes/F and K wastes; and waste code carry through principle.

Comments:_____

2. Have both the listed and characteristic waste code been assigned, where a listed waste exhibits a characteristic? [40 CFR 268.9(a)]

Yes ___ No ___ NA ✓

Comments _____

3. Has multi-source leachate been assigned the F039 waste code?* [40 CFR 261.31]

Yes ___ No ___ NA ✓

*Leachate derived exclusively from F020-F023 and/or F026-F028 dioxin wastes retains the individual waste codes.

If yes, was single-source leachate combined to form multi-source leachate? [55 FR 22623]

Yes ___ No ___

Comments _____

C. Does the facility handle the following wastes (national capacity variances)?

1. F001-F005 contaminated soil and debris resulting from a CERCLA response action or a RCRA corrective action (expires - 11/08/90). [40 CFR 268.30(c)]

Yes ___ No ✓ List _____

2. Dioxin contaminated soil and debris resulting from a CERCLA response action or a RCRA corrective action (expires - 11/08/90). [40 CFR 268.31(b)]

Yes ___ No ✓ List _____

3. California list contaminated soil and debris resulting from a CERCLA response action or a RCRA corrective action (expires - 11/08/90). [40 CFR 268.32(d)(2)]

Yes ___ No ✓ List _____

4. K048-K052 petroleum wastes (nonwastewaters; expires - 11/08/90). [40 CFR 268.35 (b)]

Yes ✓ No ___ List K050

5. Soil and debris contaminated with wastes that had treatment standards based on incineration set in the Second Third rule - F010, F024, K009, K010, K011, K013, K014, K023, K027, K028, K029, K038, K039, K040, K043, K093, K094, K095, K096, K113, K114, K115, K116, P039, P040, P041, P043, P044, P062, P071, P085, P089, P094, P097, P109, P111, U028, U058, U069, U087, U088, U102, U107, U190, U221, U223, U235 (expires - 06/08/91). [40 CFR 268.34(d)]

Yes ___ No ✓ List _____

6. Soil and debris contaminated with wastes that had treatment standards set in the Third Third rule based on incineration, mercury retorting, or vitrification. See Appendix A; (expires - 05/08/92). [40 CFR 268.35(e)]

Yes ___ No ✓ List _____

7. The following nonwastewaters - F039, K031, K084, K101, K102, K106, P010, P011, P012, P036, P038, P065, P087, P092, U136, U151. (expires -05/08/92). [40 CFR 268.35(c)]

Yes ___ No ✓ List _____

8. The following wastes identified as hazardous based on a characteristic alone: D004 (nonwastewaters), D008 (lead materials stored before secondary smelting), D009 (nonwastewaters) (expires - 05/08/92). [40 CFR 268.35(c)]

Yes ___ No ✓ List _____

9. Inorganic solid debris as defined in 40 CFR 268.2(g)*; includes chromium refactory bricks carrying EPA Hazardous Waste Nos. K048-K052 (expires - 05/08/92). [40 CFR 268.35(c)]

Yes ___ No ✓ List _____

*Note: Incorrect reference (40 CFR 268.2(a)(7)) in Third Third rule.

10. RCRA hazardous wastes that contain naturally occurring radioactive materials (expires - 05/08/92). [40 CFR 268.35(c)]

Yes ___ No ✓ List _____

11. Wastes listed in 40 CFR 268.10, 268.11, and 268.12 that are mixed radioactive/hazardous wastes (expires - 05/08/92)*. [40 CFR 268.35(d)]

Yes ___ No ✓ List _____

*Note: 40 CFR 268.10 and 268.11 wastes incorrectly omitted from this variance in the Third Third rule.

RCRA LAND DISPOSAL RESTRICTION INSPECTION

III. GENERATOR REQUIREMENTS

A. Treatability Group/Treatment Standard Identification*

*Note: This information is generally available on LDR notifications. If not, waste profile data and other documentation should be checked.

1. F001-F005 Spent Solvent Wastes: Does the generator correctly determine the appropriate treatability group/treatment standard for each F-solvent?

Yes ___ No ___ NA ✓

If available, list each waste code and check the correct treatability group.

Waste Code	Wastewater*	Nonwastewater
___	___	___
___	___	___
___	___	___

*Less than 1% by weight total organic carbon (TOC), or less than 1% by weight total F001-F005 solvent constituents listed in 40 CFR 268.41, Table CCWE. [40 CFR 268.2(f)(1)]

Comments _____

2. F020-F023 and F026-F028 Dioxin Wastes: Does the generator correctly determine the appropriate treatability group/treatment standard for each dioxin waste?

Yes ___ No ___ NA ✓

If yes, list each waste code and check the correct treatability group.

Waste Code	Wastewater*	Nonwastewater
___	___	___
___	___	___
___	___	___

Comments _____

*Less than 1% TOC by weight and less than 1% total suspended solids (TSS) by weight. [40 CFR 268.2(f)]

3. First, Second, and Third Third Wastes:

a. Does the generator correctly determine the appropriate treatability group/treatment standard for each waste?

Yes ✓ No ___ NA ___

If available, list each waste code and check the correct treatability group:

Waste Code	Subcategory	Wastewater*	Nonwastewater
K050			✓
D001			✓
F037			✓
F038			✓

* Less than 1% TOC by weight and less than 1% total suspended solids (TSS) with the following exceptions: K011, K013, and K014 wastewaters - less than 5% by weight TOC and less than 1% by weight TSS; K103 and K104 wastewaters - less than 4% by weight TOC and less than 1% by weight TSS. [40 CFR 268.2(f)(2) and (3)]

Comments_____

b. Do the assigned treatment standards for listed wastes cover constituents that may cause the waste to exhibit any characteristics? [40 CFR 268.9 (b)]

Yes ✓ No __ NA __

c. Does the generator specify alternative treatment standards for lab packs?*

Yes __ No __ NA ✓

*Use of the alternative treatment standards is not required. [55 FR 22629]

If yes, do lab packs only contain the following wastes?* [40 CFR 268.42(c)(2)]

__ Organometallics: 40 Part 268, Appendix IV constituents
__ Organics: 40 CFR Part 268, Appendix V constituents

*Unregulated wastes and hazardous wastes which meet treatment standards may be commingled in the appropriate Appendix IV and V lab pack. [55 FR 22629]

d. Does the generator specify alternative treatment standards for F039 multi-source leachate?*

Yes __ No __ NA ✓

*Use of the alternative treatment standards is required. [55 FR 22619]

4. California List Wastes: Has the generator correctly identified the treatability group and treatment standard/prohibition level for the following wastes? [55 FR 22675]

a. Liquid hazardous wastes containing PCBs ≥50 ppm

Yes __ No __ NA ✓

If yes, check the appropriate treatability group:

__ 50 to 500 ppm PCBs
__ ≥500 ppm PCBs

b. Listed or characteristic wastes containing ≥1,000 mg/l (liquids) or mg/kg (non-liquids) HOCs, which are not listed or characterized by the HOC content

Yes ___ No ___ NA ✓

If yes, check the appropriate treatability group:

___ Dilute HOC wastewater (1,000 mg/l to 10,000 mg/l HOCs)
___ All other HOCs greater than or equal to the prohibition level of 1,000 mg/l (liquids) or mg/kg (non-liquids)

c. Liquid hazardous wastes that exhibit a characteristic and also contain ≥ 134 mg/l nickel and/or ≥130 mg/l thallium

Yes ___ No ___ NA ✓

5. National Capacity Variance Wastes: Have all applicable California List prohibitions been identified for wastes covered under national capacity variances? (See Appendix A.)

Yes ___ No ___ NA ✓

If a wastestream contains a mixture of wastes, and a variance only applies to some of the waste codes, has the generator identified all applicable treatment standards and California List prohibitions? (See Appendix A.)

Yes ___ No ___ NA ✓

If California List prohibitions apply to wastestreams managed by the generator, complete the following table for each waste code, noting the date on which relevant national capacity variances expire.

Waste Code	Cal List Applicability	Expiration Date
___	_____	__/__/__
___	_____	__/__/__
___	_____	__/__/__

Comments _____

6. Treatment standards expressed as required technologies: Has the generator specified an alternative method to that required in 40 CFR 268.42?

Yes ___ No ___ NA ✓

If yes, list the waste code, the technology specified in 40 CFR 268.42, the alternative method, and documentation of approval. [40 CFR 268.42(b)]

Waste Code	Required Technology	Alternative Method	Approval
___	_____	_____	_____
___	_____	_____	_____
___	_____	_____	_____

Comments _____

7. Does the generator mix restricted wastes with different treatment standards for a constituent of concern?

Yes ___ No ✓

If yes, did the generator select the most stringent treatment standards? [40 CFR 268.41(b) and 268.43(b)]

Yes ___ No ___

Comments _____

B. Waste Analysis

1. Does the generator determine whether restricted wastes exceed treatment standards/prohibition levels at the point of generation?* [268.7(a)]

Yes ✓ No ___

*Note: This determination may be made at the point of disposal if the waste only has a prohibition level in effect.

If no, does the generator ship all restricted wastes as not meeting treatment standards?

Yes ___ No ___

Comments _____

2. Which of the following analytical methods does the generator employ?*

*Note: A "No" answer to applicable questions b. through d. does not necessarily constitute a violation. However, knowledge of waste is rarely adequate if a generator certifies that treatment standard criteria have been met.

a. Knowledge of waste:

Yes ___ No ✓

If yes, list the wastes for which applied knowledge was used and describe the basis of determination. Attach documentation. [40 CFR 268.7(a)(5)]

_____

_____

b. TCLP*: Are wastes with treatment standards specified in 40 CFR 268.41 analyzed using TCLP?** (BDAT*** = stabilization/immobilization technology)

Yes ✓ No ___ NA ___

*TCLP = Toxicity Characteristic Leaching Procedure (40 CFR Part 268, Appendix I, EPA Test Method 1311)
**See Appendix C for exceptions.
***BDAT = best demonstrated available technology. See Appendix A.

If yes, list the wastes for which TCLP was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results. [40 CFR 268.7(a)(5)]

See waste disposition form attached

c. Total constituent analysis: Are wastes with treatment standards specified in 268.43 analyzed using total constituent analysis?* (BDAT = destruction/removal technology)

Yes ___ No ___ NA ✓

*See Appendix C for exceptions.

If yes, list the wastes for which total constituent analysis was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results. [40 CFR 268.7(a)(5)]

d. PFLT*: Was PFLT used to determine if California List constituents were contained in *liquid* hazardous waste?

Yes ___ No ___ NA ✓

*PFLT = Paint Filter Liquids Test (Test Method 9095, EPA Publication No. SW-846)

If yes, list the wastes for which PFLT was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results. [40 CFR 268.7 (a)(5)]

3. Does the generator treat restricted wastes in 90-day tanks or containers regulated under 40 CFR 262.34 (permissible in some states)?

Yes ___ No ✓ (If No, go to 4.)

Does the generator treat the wastes to meet appropriate treatment standards/prohibition levels?

Yes ___ No ___

If yes, has the generator prepared a waste analysis plan detailing the frequency of testing to be conducted? 40 CFR 268.7(a)(4)]

Yes ___ No ___ (If No, go to 4.)

Does the plan fulfill the following? [40 CFR 268.7(a)(4)(i)]

___ Based on a detailed chemical and physical analysis of a representative sample
___ Contains information necessary to treat the wastes in accordance with 40 CFR Part 268 requirements

Has the plan been filed with the Regional Administrator (return receipt, Federal Express slip, etc. required for verification)? [40 CFR 268.7(a)(4)(ii)]

Yes ___ No ___

Comments _____

4. Dilution Prohibition [40 CFR 268.3]:

a. Does the generator mix prohibited* wastes with different treatment standards?

*See Appendix E for distinction between restricted and prohibited wastes.

Yes ___ No ✓ (If No, go to b.)

List the wastes _____

Are the wastes amenable to the same type of treatment? [55 FR 22666]

Yes ___ No ___

Comments _____

b. Does the generator dilute prohibited wastes to meet treatment standard criteria, or render them non-hazardous? [55 FR 22665-22666]

Yes ___ No ✓ (If No, go to c.)

Check appropriate category:

___ Dilutes to meet treatment standards
___ Dilutes to render waste non-hazardous

Do the wastes fall into the following categories? (Check if appropriate.) [40 CFR 268.3(b)]

___ Managed in treatment systems regulated under the Clean Water Act
___ Non-toxic* characteristic wastes
___ Treatment standard specified in 40 CFR 268.41 or 268.43

*Non-toxic = D001(except high TOC nonwastewaters), D002, and D003(except cyanides and sulfides). [55 FR 22666]

If the wastes do not fall into the above categories, briefly describe the conditions under which they were diluted.

_____

c. Based on an assessment of points a. and b., and any other relevant circumstances, does the generator dilute prohibited wastes as a substitute for adequate treatment? [40 CFR 268.3(a)]

Yes ___ No ✓

Comments _____

5. F039 Multi-source leachate: Has the generator run an initial analysis for all constituents of concern in 40 CFR 268.41 and 268.43? [55 FR 22620]

Yes ___ No ___ NA ✓

C. **Management**

1. On-Site Management

a. Are restricted wastes treated (other than in a RCRA exempt unit), stored for greater than 90 (small quantity generator* - 180) days, or disposed on site?

Yes ✓ No ___

(If yes, the TSD Checklist must also be completed.)

* Small quantity generator = generator of greater than or equal to 100 kg/mo. but less than 1,000 kg/mo. hazardous waste, or less than 1 kg/mo. acutely hazardous waste

Comments_____

b. If the generator treats characteristic wastes in systems regulated under the Clean Water Act, have the following been documented: the determination of restriction, how restricted wastes are managed, and why wastes discharged pursuant to an NPDES permit are not prohibited (if applicable)? [55 FR 22662]

Yes ___ No ___ NA ✓

c. If the generator treats characteristic wastes in RCRA exempt units to render them non-hazardous, are the wastes managed as restricted until 40 CFR Part 268 treatment standards are met?* [40 CFR 268.9(d)]

Yes ___ No ___ NA ✓

*This applies to both concentration based treatment standards specified in 40 CFR 268.41 and 268.43, and to some 40 CFR 268.42 required methods which result in treatment below the characteristic level. See Appendix D.

2. Off-Site Management: Waste Exceeds Treatment Standards

a. Does the generator ship any waste that exceeds treatment standards /prohibition levels (not subject to a national capacity variance) to an off-site treatment or storage facility?

Yes ___ No ✓ (If No, go to 3.)

Identify waste code(s) and off-site treatment or storage facilities to which wastes are shipped.

Waste Code	Receiving Facility
___	_____
___	_____
___	_____

Does the generator provide a notification to the treatment or storage facility? [40 CFR 268.7(a)(1)]

Yes ___ No ___ (If No, go to 3.)

If the generator specifies alternative treatment standards for lab packs, is the certification required in 40 CFR 268.7(a)(7) or (8) included with the notification?

Yes ___ No ___ NA ___

b. Is a notification sent with each waste shipment?

Yes ___ No ___

If no, is the waste subject to a tolling agreement pursuant to 262.20(e) (small quantity generator only)?

Yes ___ No ___ (If No, go to 3.)

List waste codes and subsequent handler with whom a contractual tolling agreement is held.

Waste Code	Subsequent Handler
___	_____
___	_____
___	_____

Did the small quantity generator provide a notification to the receiving facility with the first waste shipment subject to the tolling agreement? [40 CFR 268.7(a)(9)]

Yes ___ No ___

3. Off-Site Management: Waste Meets Treatment Standards

a. Does the generator ship waste that meets treatment standards/prohibition levels to an off-site disposal facility?

Yes ___ No ✓ (If No, go to 4.)

Identify waste code(s) and off-site disposal facilities:

Waste Code	Receiving Facility
___	_____
___	_____
___	_____

Does the generator provide a notification and a certification to the disposal facility? [40 CFR 268.7(a)(2)(i) and 268.7(a)(2)(ii)]?

Yes ___ No ___ (If No, go to d.)

b. Are a notification and a certification sent with each waste shipment?

Yes ___ No ___

If no, is the waste subject to a tolling agreement pursuant to 262.20(e) (small quantity generator only)?

Yes ___ No ___ (If No, go to c.)

List waste codes and subsequent handler with whom a contractual tolling agreement is held.

Waste Code	Subsequent Handler
___	_____
___	_____
___	_____

Did the small quantity generator provide a notification and a certification to the receiving facility with the first waste shipment subject to the tolling agreement? [40 CFR 268.7(a)(9)]

Yes ___ No ___

c. Are characteristic wastes which have been rendered non-hazardous (in a RCRA exempt unit) shipped to a Subtitle D facility?

Yes ___ No ___ NA ___ (If No or NA, go to 4.)

Complete the following table:

Waste Code	Receiving Facility
___	_____
___	_____
___	_____

Are a notification and a certification for each shipment sent to the Regional Administrator or authorized State? [40 CFR 268.9(d)(1) and 268.7(b)(5)]?

Yes ___ No ___

4. Off-Site Management: Wastes Subject to Variances, Extensions, or Petitions

a. Does the generator ship wastes to a treatment, storage, or disposal facility which are subject to a national capacity variance (40 CFR Part 268, Subpart C), or case-by-case extension (40 CFR 268.5)?

Yes ___ No ✓ (If No, go to 5.)

Complete the following table:

Waste Code	Receiving Facility
___	_____
___	_____
___	_____

Does the generator provide notification to the off-site receiving facility that the waste is not prohibited from land disposal? [40 CFR 268.7(a)(3)]

Yes ___ No ___

b. Is a notification sent with each waste shipment?

Yes ___ No ___

If no, is the waste subject to a tolling agreement pursuant to 40 CFR 262.20(e) (small quantity generator only)?

Yes ___ No ___ (If No, go to 5.)

List waste codes and subsequent handler with whom a contractual tolling agreement is held.

Waste Code	Subsequent Handler
___	_____
___	_____
___	_____

Did the small quantity generator provide a notification to the receiving facility with the first waste shipment subject to the tolling agreement? [40 CFR 268.7(a)(9)]

Yes ___ No ___

5. Records Retention

Does the generator retain on site copies of all notifications, certifications, and other relevant documents for a period of 5 years? [40 CFR 268.7(a)(6)]

Yes ___ No ✓

Are copies of relevant tolling agreements, along with the LDR notification and/or certification, kept on site for at least 3 years after expiration or termination of the agreement? [40 CFR 268.9]

Yes ___ No ___ NA ✓

Do LDR documents reflect proper management of wastes previously covered under expired national capacity variances, case by case extensions and the soft hammer provision*?

Yes ✓ No ___ NA ___

*See Appendix B. Note that the soft hammer provision expired as of 05/08/90. Soft hammer wastes which had treatment standards established in the Third Third rule were granted a minimum 90-day national capacity variance to 08/08/90.

Comments _____

D. **Treatment Using RCRA 40 CFR Parts 264 and 265 Exempt Units or Processes**

1. Are restricted wastes treated in RCRA exempt units (i.e., boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.)?

   Yes ✓ No ___ (If No, do not complete this section.)

   List types of waste treatment units and processes:

Waste Code	Type of Treatment	Treatment Units and Processes
K050	wastewater	wastewater treatment tanks
F038	pretreatment	"
F037		"

2. Are treatment residuals generated from these units?

   Yes ✓ No ___

   Comments _____

3. Are residuals further treated, stored for greater than 90/180 days, or disposed on site?

   Yes ___ No ✓ NA ___

   (If yes, the TSD checklist must also be completed.)

E. **Additional Comments, Concerns, or Issues Not Addressed in the Checklist:**

RCRA LAND DISPOSAL RESTRICTION INSPECTION

IV. TSD REQUIREMENTS

No longer land apply. Landfarming occurred from Nov. 1980 to Sept. 1981. No waste accepted from off-site

A. Waste Analysis [40 CFR 268.7(b), 264.13, and 265.13]

1. Does the waste analysis plan address the following LDR waste categories? [40 CFR 264.13(b)(6) and 265.13(b)(6)]

F001-F005 Spent Solvents	Yes ___	No \	NA ✓
F020-F023 and F026-F028 Dioxins	Yes ___	No ___	NA ✓
California List Wastes	Yes ___	No ___	NA ✓
First, Second, and Third Third Wastes	Yes ✓	No ___	NA ___

Comments _____

2. Has the waste analysis plan been revised to address F039 multi-source leachate?

Yes ___ No ___ NA ✓

3. What date was the waste analysis plan last revised? 7/16/84

4. Does analytical data contain all the information required to treat, store, or dispose of restricted wastes? [40 CFR 264.13(a)(1) and 265.13(a)(1)]

Yes ✓ No ___

If yes, which of the following are sources of analytical data? (More than one may apply.):

✓ Generator provides data
___ Facility performs analyses in on-site laboratory
___ Facility contracts analyses at off-site laboratory

If the generator provides data, does the facility provide corroborative testing? [40 CFR 264.13(a)(2) and 265.13(a)(2)]

Yes ___ No ___ NA ✓ On-site disposal

If analyses are conducted off site, identify lab: _____

a. Are wastes with treatment standards specified in 40 CFR 268.41 analyzed using the toxicity characteristic leaching procedure (TCLP)?* (BDAT** = stabilization/immobilization technology) [40 CFR 268.7(b)(1)]

Yes ___ No ___ NA ✓ disposed of before TCLP

*See Appendix C for exceptions.
**BDAT = best demonstrated available technology. See Appendix A.

If yes, list the wastes for which TCLP was used and provide the date of last test, frequency of testing, and note any problems. Attach test results. [40 CFR 264.73 (b)(3) and 265.73(b)(3)]

b. Are wastes with treatment standards specified in 40 CFR 268.43 analyzed using total constituent analysis?* (BDAT = destruction/removal technology) [40 CFR 268.7(b)(3)]

Yes ___ No ___ NA ✓

*See Appendix C for exceptions.

If yes, list the wastes for which total constituent analysis was used and provide the date of last test, frequency of testing, and note any problems. Attach test results. [40 CFR 264.73 (b)(3) and 265.73(b)(3)]

c. Is the paint filter liquids test (PFLT) used to determine if California List wastes are contained in *liquid* hazardous waste? [40 CFR 268.32(i)]

Yes ___ No ___ NA ✓

If yes, list the wastes for which PELT was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results. [40 CFR 264.73(b)(3) and 265.73(b)(3)]

B. Operating Record [40 CFR 264.73 and 265.73]

1. Does the operating record contain records and results of waste analyses performed as specified in 40 CFR 268.4 and/or 40 CFR 268.7(b)? [40 CFR 264.73(b)(3) and 265.73(b)(3)]

Yes ✓ No ___

2. Does the operating record contain copies of LDR notifications and certifications?* [40 CFR 264.73(b)(11), (13), and (15) and 40 CFR 265.73(b)(11), (13), and (15)]

Yes ___ No ___ NA ✓ No off-site waste received

*Include both those received from generators, and those prepared for off-site shipments.

3. Does the operating record include appropriate documentation for restricted wastes which are managed wholly on site? [40 CFR 264.73(b)(12), (14), and (16) and 265.73(b)(12), (14), and (16)]

Yes ✓ No ___ NA ___

Does the documentation discussed in points 2. and 3. reflect proper historical management of wastes previously covered under expired national capacity variances, case by case extensions, and the soft hammer provision?*

Yes ___ No ___ NA ✓

*Note that the soft hammer provision expired as of 05/08/90. Soft hammer wastes which had treatment standards established in the Third Third rule were granted a minimum 90-day national capacity variance to 08/08/90.

C. Storage [40 CFR 268.50]

1. Are prohibited* wastes stored on site in containers?

Yes ___ No ✓ (If No, go to 2.)

*See Appendix E for distinction between restricted and prohibited wastes.

Are all containers clearly marked to identify the contents and date(s) entering storage? [40 CFR 268.50(a)(2)(i)]

Yes ___ No ___

Have wastes been stored for more than one year since the applicable LDR regulations went into effect?

Yes ___ No ___ (If No, go to 2.)

Can the facility show that such accumulation is necessary to facilitate property recovery, treatment, or disposal? [40 CFR 268.50 (c)]

Yes ___ No ___

If yes, state how:_____

2. Are prohibited wastes stored on site in tanks?

Yes ___ No ✓ (If No, go to 3.)

Are all tanks clearly marked with a description of the contents, the quantity of each hazardous waste received, and date each period of accumulation begins, or is such information recorded and maintained in the operating record? [40 CFR 268.50(a)(2)(ii)]

Yes ___ No ___

Have tanks been emptied at least once per year since the applicable LDR regulations went into effect?

Yes ___ No ___ (If Yes, go to 3.)

Can the facility show that such accumulation is neccesary to facilitate proper recovery, treatment, or disposal? [40 CFR 268.50(c)]

Yes ___ No ___

If yes, state how: _____

3. Does the facility store liquid hazardous waste containing PCBs at concentrations greater than or equal to 50 ppm?

Yes ___ No ✓ (If No, go to D.)

Does the facility meet the TSCA criteria in 40 CFR 761.65(b)? [40 CFR 268.50(f)]

Yes ___ No ___

Have these wastes been stored for more than one year? [40 CFR 268.50(f)]

Yes ___ No ___

D. Treatment

No treatment

Does the facility treat restricted wastes other than in surface impoundments?

Yes ___ No ✓ (If No, do not complete this section. Go to E.)

2. Are required technologies used to treat wastes which have treatment standards specified in 40 CFR 268.42? [40 CFR 268.40(b)]

Yes___ No___ NA___ (If Yes or NA, go to 3.)

Was an alternative method approved?

Yes___ No___

List each waste code, the technology specified in 40 CFR 268.42, and the alternative method. Check if approval of the alternative method is documented. [40 CFR 268.42(b)]

Waste Code	Required Technology	Alternative Method	Approval

3. Lab packs: If alternative treatment standards are specified, are incinerator residues from lab packs containing D004, D005, D006, D007, D008, D010, and D011 treated in compliance with the subpart D treatment standards for these characteristic wastes? [40 CFR 268.42(c)(4)]

Yes___ No___ NA___

4. Describe all other waste codes and treatment processes:

Waste Code	Treatment Processes
_____	_____
_____	_____
_____	_____

5. Characteristic wastes:

Is the 40 CFR Part 268 treatment standard lower than the 40 CFR Part 261 characteristic level?*

Yes ___ No ___

*This applies to both concentration based treatment standards specified in 40 CFR 268.41 and 268.43, and to some 40 CFR 268.42 required methods which result in treatment below the characteristic level. See Appendix D.

If yes, does the facility manage the waste as restricted until 40 CFR Part 268 treatment standards are met, even after the waste is rendered non-hazardous? [40 CFR 268.9(d)]

Yes ___ No ___

Comments_____

6. Dilution Prohibition [40 CFR 268.3]:

a. Does the facility mix prohibited wastes with different treatment standards?

Yes ___ No ___ (If No, go to c.)

List the wastes_____

b. Are the wastes amenable to the same type of treatment? [55 FR 22666]

Yes ___ No ___

If yes, is this method used for the aggregated wastes?

Yes ___ No ___

Comments_____

c. Based on an assessment of points a. and b., or any other relevant information, is dilution used as a substitute for treatment? [40 CFR 268.3(a)]

Yes ___ No ___

Comments_____

7. Does the facility, in accordance with an acceptable waste analysis plan, test residues from all treatment processes? [40 CFR 268.7(b)]

Yes ___ No ___

Comments _____

8. Does the facility ship any characteristic wastes which have been rendered non-hazardous to a Subtitle D facility?

Yes ___ No ___ (If No, go to 9.)

Complete the following table:

Waste Code	Receiving Facility
___	_____
___	_____
___	_____

Are a notification and a certification for each shipment sent to the Regional Administrator or authorized State? [40 CFR 268.9(d)(1) and 268.7(b)(5)]

Yes ___ No ___

9. Does the facility ship any wastes or treatment residues to an off-site land disposal facility?

Yes ___ No ___ (If No, go to 10.)

Complete the following table:

Waste Code	Receiving Facility
___	_____
___	_____
___	_____

Are a notification and a certification provided to the land disposal facility with each waste shipment? [40 CFR 268.7(b)(4) and 40 CFR 268.7(b)(5)]

Yes ___ No ___

10. Does the facility ship any wastes or treatment residues to be further managed at a different treatment or storage facility?

Yes ___ No ___ (If No, go to E.)

Complete the following table:

Waste Code	Receiving Facility
____	_____
____	_____
____	_____

Are appropriate generator notifications and certifications provided to the receiving facility with each waste shipment? [40 CFR 268.7(b)(6)]

Yes ___ No ___

E. Surface Impoundments [40 CFR 268.4]

1. Are restricted wastes placed in surface impoundments for treatment?

Yes ___ No ✓ (If No, go to F.)

List _____

2. Are evaporation or dilution the only recognizable treatment occurring in the surface impoundment? [40 CFR 268.3(a) and 268.4(b)]

Yes ___ No ___

Comments _____

3. Has the facility submitted to the Agency a waste analysis plan and certification of compliance with minimum technology requirements and ground-water monitoring requirements? [40 CFR 268.4(a)(4)]

Yes ___ No ___

4. If the minimum technology requirements have not been met, has a waiver been granted for that unit? [40 CFR 268.4(a)(3)(ii)]

Yes ___ No ___ NA ___

5. Are representative samples of sludge and supernatant from the surface impoundment tested separately, acceptably, and in accordance with the sampling frequency and analyses specified in the waste analysis plan? (Attach test results.) [40 CFR 268.4(a)(2)(i)]

Yes ___ No ___

6. Does the operating record adequately document the results of waste analyses performed in accordance with 40 CFR 268.4? [40 CFR 264.73(b)(3) and 265.73(b)(3)]

Yes ___ No ___

Comments _____

7. Do the treatment residues (sludges or liquids) exceed applicable treatment standards/prohibition levels?

Sludge Yes ___ No ___ Waste Code _____
Supernatant Yes ___ No ___ Waste Code _____

Provide the frequency of analyses conducted on treatment residues:

_____

8. If sludge residues exceed treatment standards/prohibition levels, are they removed on an annual basis? [40 CFR 268.4(a)(2)(ii)]

Yes ___ No ___ NA___

Comments _____

Are residues subsequently managed in another surface impoundment? [40 CFR 268.4(a)(2)(iii)]

Yes ___ No ___

9. If supernatant is determined to exceed treatment standards, is annual throughput greater than impoundment volume? [40 CFR 268.4(a)(2)(ii)]

Yes ___ No ___ NA___

Comments _____

F. **Land Disposal**

Activity ceased in 1981. N/A

1. Are restricted wastes placed in or on the land in units such as landfills, surface impoundments*, waste piles, land treatment units, salt domes/beds, mines/caves, concrete vaults, or bunkers? [40 CFR 268.2(c)]

Yes ✓ No ___ (If No, go to G.)

*Note: Do not include surface impoundments addressed in E.

If yes, specify which units and what wastes each unit has received:

Unit	Waste
land treatment	K051

2. Does the facility, in accordance with an acceptable waste analysis plan, test prohibited wastes prior to land disposal to ensure that all applicable treatment standards and/or prohibition levels have been met? [40 CFR 268.7(c)(2)]

Yes ___ No ✓ Ceased activities in 1981

Comments _____

3. Does the facility test wastes to ensure that they do not exhibit any characteristics at the point of disposal?* [40 CFR 268.9(c)]

Yes ___ No ___ NA___

*Note: A waste may exceed a characteristic level only if the treatment standard for that characteristic has been met.

4. Does the operating record adequately document the results of waste analyses performed in accordance with 40 CFR 268.7(c)? [40 CFR 264.73(b)(3) and 265.73(b)(3)

Yes ___ No ___

If yes, at what frequency are analyses performed?_____

_____

5. Does the facility land dispose of restricted wastes which are not prohibited?

Yes ___ No ___ (If No, go to 6.)

List waste codes in appropriate category below:

National Capacity Variance (40 CFR Part 268, Subpart C)_____
Case-By-Case Extension (40 CFR 268.5)_____
No-Migration Petition (40 CFR 268.6)_____
Treatment Standard Variance (40 CFR 268.44)_____

Does the operating record contain records of the quantities, date of placement, and a copy of the generator notification [40 CFR 268.7(a)(3)] for each shipment of restricted waste subject to a case-by case extension or no-migration petition? [40 CFR 264.73(b)(10) and 265.73(b)(10)]

Yes ___ No ___ NA ___

Do land disposal units receiving wastes covered by a national capacity variance or case-by-case extension meet the requirements in 40 CFR 268.5(h)(2)?

Yes ___ No ___ NA ___

If the facility has a case-by-case extension, is progress being made as described in reports to the Regional Administrator?

Yes ___ No ___ NA ___

6. Are restricted wastes placed in underground injection wells?

Yes ___ No ___ List _____

G. Other Wastestreams

1. Does the facility generate wastes other than residues from RCRA treatment units?

Yes ___ No ✓ (If No, go to H.)

2. On-Site Management

a. If characteristic wastes are treated in systems regulated under the Clean Water Act, have the following been documented: the determination of restriction, how restricted wastes are managed, and why wastes discharged pursuant to an NPDES permit are not prohibited (if applicable)? [55 FR 22662]

Yes ___ No ___ NA ___

b. If characteristic wastes are treated in RCRA exempt units to render them non-hazardous, are the wastes managed as restricted until 40 CFR Part 268 treatment standards are met?* [40 CFR 268.9(d)]

Yes ___ No ___ NA ___

*This applies to both concentration based treatment standards specified in 40 CFR 268.41 and 268.43, and to some 40 CFR 268.42 required methods which result in treatment below the characteristic level. See Appendix D.

3. Off-Site Management: Waste Exceeds Treatment Standards

Are wastes that exceed treatment standards/prohibition levels (not subject to a national capacity variance) shipped to an off-site treatment or storage facility?

Yes ___ No ___ (If No, go to 4.)

Identify wastes code(s) and off-site treatment or storage facilities to which wastes are shipped.

Waste Code	Receiving Facility
___	_____
___	_____
___	_____

Are LDR notifications provided for each shipment to the treatment or storage facility? [40 CFR 268.7(a)(1)]

Yes ___ No ___ (If No, go to 4.)

If alternative treatment standards are specified for lab packs, is the certification required in 40 CFR 268.7(a)(7) or (8) included with the notification?

Yes ___ No ___ NA ___

4. Off-Site Management: Wastes Meets Treatment Standards

a. Are wastes that meet treatment standards/prohibition levels shipped to an off-site disposal facility?

Yes ___ No ___ (If No, go to 5.)

Identify waste code(s) and off-site disposal facilities:

Waste Code	Receiving Facility
_____	_____
_____	_____
_____	_____

Are LDR notifications and certifications provided for each shipment to the disposal facility? [40 CFR 268.7(a)(2)(i) and 268.7(a)(2)(ii)]?

Yes ___ No ___ (If No, go to b.)

b. Are characteristic wastes which have been rendered non-hazardous (in a RCRA exempt unit) shipped to a Subtitle D facility?

Yes ___ No ___ NA ___ (If No or NA, go to 5.)

Complete the following table:

Waste Code	Receiving Facility
_____	_____
_____	_____
_____	_____

Are a notification and a certification for each shipment sent to the Regional Administrator or authorized State? [40 CFR 268.9(d)(1) amd 268.7(b)(5)?

Yes ___ No ___

5. Off-Site Management: Wastes Subject to Variances, Extensions, or Petitions

a. Are wastes that are subject to a national capacity variance (40 CFR Part 268, Subpart C) or a case-by-case extension (40 CFR 268.5) shipped to a treatment, storage, or disposal facility?

Yes ___ No ___ (If No, go to 6.)

Complete the following table:

Waste Code	Receiving Facility
_____	_____
_____	_____
_____	_____

b. Are LDR notifications (stating that the waste is not prohibited from land disposal) provided for each shipment to the off-site receiving facility? [40 CFR 268.7(a)(3)]

Yes ___ No ___

6. Dilution Prohibition [40 CFR 268.3]:

a. Are prohibited* wastes with different treatment standards mixed?

*See Appendix E for distinction between restricted and prohibited wastes.

Yes ___ No ___ (If No, go to b.)

List the wastes _____

Are the wastes amenable to the same type of treatment? [55 FR 22666]

Yes ___ No ___

Comments _____

b. Are prohibited wastes diluted to meet treatment standard criteria, or render them non-hazardous? [55 FR 22665-22666]

Yes ___ No ___ (If No, go to c.)

Check appropriate category:

___ Dilutes to meet treatment standards
___ Dilutes to render waste non-hazardous

Do wastes fall into the following categories? (Check if appropriate.) [40 CFR 268.3(b)]

___Managed in treatment systems regulated under the Clean Water Act
___Non-toxic* characteristic wastes
___Treatment standard specified in 40 CFR 268.41 or 268.43

*Non-toxic = D001 (except high TOC nonwastewaters), D002, and D003 (except cyanides and sulfides). [55 FR 22666]

If the wastes do not fall into the above categories, briefly describe the conditions under which they were diluted.

_____
_____
_____

c. Based on an assessment of points a. and b., and any other relevant circumstances, are prohibited wastes diluted as a substitute for adequate treatment? [40 CFR 268.3(a)]

Yes ___ No ___

Comments_____

H. Additional Comments, Concerns, or Issues Not Addressed in the Checklist:

_____
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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			**PART 703** **RCRA PERMIT PROGRAM** **Subpart C: Authorization by Rule and Interim Status** **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 ✓				Part-A initially filed in 11/17/80

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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			**Section 703.151: Application by New HWM Facilities**			✓	N/A. Not a new facility
				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.**				Part A ammended on 9/18/90

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**	✔			
				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 ___				Change of ownership occurred on 12/1/89.

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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 723 **STANDARDS APPLICABLE TO TRANSPORTERS OF HAZARDOUS WASTE** **Subpart A: General**			✓	N/A - Uno-cal/Uno-Ven notified as a transporter. Between 1980-1981, haz. waste was transported from process areas, 1½ blocks on public roads, to the land farm area. No haz. waste has been transported since 1981.
				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 in 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			**Section 723.111: USEPA Identification Number**	✓			
			a	Has the transporter obtained a USEPA identification number?				
OTH	1	X		**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 ____				

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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 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 ___				

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			**PART 722** **GENERATOR STANDARDS** **Subpart B: The Manifest** **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 ____				

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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
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 ___				Indiana
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 ___				

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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.
				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 ✓				No bulk shipments by water
			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 ✓				None by rail.

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**			✓	N/A - No waste ready for transport.
				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**			✓	n/a - supplied by transporter.
				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.**				Facility accumulates haz. waste, treats, and has disposal units - Regulated as disposal, Landfarms are not closed yet. - TO2 unit due to TC Rule. - no waste has been placed in LF since 1981.
			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.**				

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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	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.				No waste on-site.
			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 ____				

IL 532-1502

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
				FOR WASTE IN TANKS, has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subpart J: Tank Systems listed below: **NOTE: If the facility has discontinued accumulation of waste in tanks, they are subject to 725.211 and 725.214.** **NOTE: If no waste in tanks, mark N/A and skip to "For waste in containers ...", Subsection a)2) page GEN-C-14.** **Assessment of Existing Tank Systems (Section 725.291)** For tanks not protected by a secondary containment system, is an independent, certified written assessment available? Yes ____ No ____ **NOTE: Except as provided in Subsection (c) of 725.291, certified assessment must be available by 1/12/88.** Does this assessment consider at least the following: 1) available standards for the tank and ancillary equipment; 2) hazardous characteristics of the wastes; 3) existing corrosion protection measures; 4) age of the tank system; and 5) results of a leak test, internal inspection, or other tank integrity examination? Yes ____ No ____			✓	NA - To tanks no waste on-site.

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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
			a2	**For waste in containers,** has the generator marked and made visisble for inspection on each container, the date upon which accumulation began? Yes ____ No ____ N/A ✓				N/a - no waste in containers.
			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, Subpart C: Preparedness and Prevention listed below: **Maintenance and Operation of Facility (Section 725.131)** 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 ____				See TSD Checklist

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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 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 ✓				Not needed.
			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 ✓				No actions.
			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 ✓				No. requests.

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LPC 256 8

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**			✓	N/A - not needed.
			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?			✓	N/a. not needed.

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REVISION 1 (8/[illegible]8)

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 ✓				
				NOTE: 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 ✓				

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Area	Class	90 Day Ltr 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 ✓				N/A - No such sources
			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 ✓				No Post-Closure
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 ____				

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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
			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 ✓				No changes
			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 ✓				No waste from off-site.
			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 ___				

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Area	Class	90 Day 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 ___ NA ✓				No wastes from off-site.

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Area	Class	90 Day F Li 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:				No wastes from off-site
				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 ✓				

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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
				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 ___				Guards, Video.
				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 ___				Fence
			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.				

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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	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 ___				

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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
				- 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 ____ NA ✓				No problems.
			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 ✓				No hazards.
			d	Does the owner or operator record the results of inspections in a log or summary? Yes ✓ No ____				
			d	Does the inspection record include: - The date and time of the inspection? Yes ✓ No ____ - The name of the inspector? Yes ✓ No ____				

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LPC 256[illegible]87

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 ____				
				<u>NOTE</u>: 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 ____				

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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
				B) Key parameters for automatic waste feed cutoff systems? Yes ____ No ____ N/A ✓				No waste feed cut-off.
				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 ____				For ~~504~~. TO2
				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 ____				

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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
				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 ___ NA ✓				No ignitable or reactive wastes.
			a	Are smoking and open flames restricted to specially designated areas when ignitable or reactive waste is being handled? Yes ___ No ___ NA ✓				

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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	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 ____				

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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
				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.**			✓	NA - locations not used.

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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 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 ___				Alarm sys, Radio, PA sys.
			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 ___				

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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.
			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.**	✓			

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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	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 ✓				never just one employee.
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:				

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Area	Class	90 Day Fil 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 ___				Romeoville FD, PD. Will County PD.
				3) Agreements with State emergency response teams, emergency response contractors and equipment suppliers? Yes ✓ No ___ N/A ___				Heritage.
				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 ___				Silver Cross.
				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 ✓				No refusals.

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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 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 ____				5.28.89 Gasoline spill. 1991 - Benzene spill
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 ____				

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Area	Class	90 Day Ltr 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 ___				
			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 ___				Dale Pirc Fire Chief.
			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 ___				

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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
				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 ___				Alarm.
			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 ___				

IL 53[illegible]02
LPC 2[illegible]787

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 ✓				Never failed.
			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 ✓				No changes.
			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**	✓			Dale Pi...
				Is there an emergency coordinator on-site or on-call at all times? 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
				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	1/2			**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.**	✓			Gasoline spill 5.28.89 leaking valve in pipeline valve. Xylene spill in 1983. Benzene spill in 1991

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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
MAN	1			**PART 725** **INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES** **Subpart E: Manifest System, Recordkeeping and Reporting** **Section 725.171: Use of Manifest System**			✓	N/A - No waste accepted from off-site.
				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 ____				

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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	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 ___				

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LPC 25[illegible]7

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 ✓				Not required.
				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 ✓				No tanks
				- 725.325 (Surface Improvements)? Yes ✓ No ____ N/A ____				
				- 725.352 (Waste Piles)? Yes ____ No ____ N/A ✓				no waste piles.
				- 725.373 (Land Treatment)? Yes ✓ No ____ N/A ____				
				- 725.441 (Incinerators)? Yes ____ No ____ N/A ✓				No incinerators.
				- 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 ✓				Not needed.

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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
				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.**				Subpart F not addressed during inspection. No such units ↓

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LPC 756 6707

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**	✓			
			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 ____ Na ✓ - The local land authority? Yes ____ No ____ N/A ✓				Closure not completed.
			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 ✓				No action/requests.

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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	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 ____				No wastes from off-site.
				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 ____				

IL 532-1
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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
				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:				not needed.
			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 ✓				

IL 532-1502
LPC 258 6/87

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 ✓				Closure not completed. ↓
				- 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 ___				

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LPC 256

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 termination.
				- 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 ✓				No decrees/orders.
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?				
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".				

IL 532-1592
LPC 258 6/87

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 I: Use and Management of Container**				
OTH	1	X		**Section 725.271: Condition of Containers**			✓	N/A - No waste in container
				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?				
OTH	1	X		**Section 725.272: Compatibility of Waste with Containers**				
				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?				
OTH	1	X		**Section 725.273: Management of Containers**				
			a	Are containers of hazardous waste always closed during storage? Yes ____ No ____				
			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 ____				

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**			✓	This is a newly regulated unit. They are planning to RCRA close unit. Also, are given till 1994 to retro-fit unit w/ proper technologies.
			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 ____				

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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	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:				

IL 532-15
LPC 256 6

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.				

IL 532-1502
LPC 258 6/87

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**			✓	not going through closure
				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**			✓	no 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.				

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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	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.				

IL 532-1592
LPC 256 6/87

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?			✓	No incompatibles

IL 532-
LPC 25[illegible]7

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 M: Land Treatment**				
OTH	1	X		**Section 725.372: General Operating Requirements**	✓			No waste disposed since 1981.
			a	Can the waste being placed in or on the land treatment facility be made less hazardous or non-hazardous by degradation, transformation or immobilization processes occurring in or on the soil? Yes ____ No ____ NA ✓				
			b	Has the owner or operator designed, constructed, and is he now operating and maintaining a run-on control system capable of preventing flow onto the active portions of the unit during peak discharge from at least a 25 year storm? Yes ✓ No ____				Drainage ditches.
			c	Has the owner or operator designed, constructed, and is he now operating a runoff management system capable of collecting and controlling a water volume at least equal to a 24 hour 25 year storm? Yes ✓ No ____				
			d	Are collection and holding facilities associated with run-on and runoff control systems being emptied or otherwise managed expeditiously after storms so as to maintain design capacity of the system? Yes ✓ No ____				
			e	Is the owner or operator managing the unit to control wind dispersal if the treatment zone contains particulate matter which may be subject to wind dispersal? Yes ____ No ____ N/A ✓				No waste disposed of since 1981.

IL 532-1502
LPO 256 6/87

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 725.373: Waste Analysis**			✓	No waste placed in unit since 1981.
				Prior to placing hazardous waste in or on a land treatment facility, has the owner or operator:				
			a	1) Determined the concentration of any substances which exceed the maximum concentrations contained in Table I of Section 721.124 that cause a waste to exhibit the characteristic of EP toxicity? Yes ____ No ____				
			b	2) Determined the concentration of any substances which caused the waste to be listed as a hazardous waste in Part 721, Subpart D? Yes ____ No ____				
			c	3) Determined the concentrations in the waste of arsenic, cadmium, lead and mercury, if food chain crops are grown, unless the owner or operator has written documented data that show that the constituent is not present? Yes ____ No ____				
OTH	1	X		**Section 725.376: Food Chain Crops**			✓	No food/chain crops.
			a	Has the owner or operator made the required notice under 725.376(a) if food chain crops are being grown, have been grown, or will be grown again on the land treatment facility? Yes ____ No ____				
			b1	Is the owner or operator complying with the requirements of 725.376(b) and (c) concerning the growing of food chain crops on land treatment facilities? Yes ____ No ____				

IL 53[illegible]2
LPC 2[illegible]87

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 725.378: Unsaturated Zone (Zone of Aeration) Monitoring**	✓			
			d	Does the owner or operator have a written unsaturated zone monitoring plan and is it maintained at the facility? Yes ✓ No ___				
				Has the owner or operator implemented his unsaturated zone monitoring plan? Yes ✓ No ___				
OTH	2			**Section 725.379: Recordkeeping**	✓			
				Is the owner or operator including the date and rate of application of hazardous waste in the operating record? Yes ✓ No ___				
CLO	1			**Section 725.380: Closure and Post-Closure**			✓	
				NOTE: Determine compliance or non-compliance with this Section only in conjunction with a closure verificiation inspection conducted after the facility and its independent registered professional engineer (or independent qualified soil scientist) have certified closure in accordance with an approved closure and post-closure plan.				Closure not completed.
				Has the land treatment facility been closed in accordance with an approved closure plan? Yes ___ No ___				- going through Closure.

IL 532-1592
LPC 258 6/87

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 725.381: Special Requirements for Ignitable or Reactive Wastes**			✓	no land treatment of these wastes.
			a	Have ignitable or reactive wastes been land treated by immediately incorporating them into the soil 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 ____				
			b	Is the waste managed in such a way that it is protected from any material or conditions which may cause it to ignite or react? Yes ____ No ____ N/A ____				
OTH	1			**Section 725.382: Special Requirements for Incompatible Wastes**			✓	
				Is the owner or operator complying with the requirements concerning the land treatment of incompatible wastes or incompatible wastes and materials contained in this Section? Yes ____ No ____				

Comp

Illinois Environmental Protection Agency
Division of Land Pollution Control

RCRA INSPECTION REPORT

SEPA #: IL D 0 4 1 5 5 0 5 6 7 | IEPA #: 1 9 7 8 0 3 0 0 0 4

Facility Name: Clno-Ven Chicago Refinery | Phone #: 708-257-7761

Street Address: 135th + New Ave. | County: Will

City: Lemont | State: IL | Zip: 60439

Region: II | Inspection Date: 10/17/90 | From: 10:00 Am To: 12:00 pm

Weather: Clear, 80°F

RECEIVED NOV 13 1990 OFFICE OF RCRA Waste Management Division U.S. EPA, REGION V

TYPE OF FACILITY

Notified As: G, Tr, D | Regulated As: G, D, (Tr)

LDF? Yes (Yes or No) HPV? No | 90-Day F/U Required?: YES ____ NO ✓

TYPE OF INSPECTION

EI: ✓ Sampling: ____ Citizen Complaint: ____ Closed: ____ Other: ____

ME/O&M: ____ Record Review: ____ Follow-Up to Inspection of: ____ Withdrawal: ____

NON-REGULATED STATUS N/A

QG: ____ Claimed Nonhandler: ____ Other (Specify in Narrative): ____

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PART A

Notification Date: 7/28/80, from (Initial) or (subsequent) Notification.

Initial Part A Date: 11/17/80 | Amended: 9/18/90

Part A Withdrawal requested: __/__/__ | Approved by (US)(IL) EPA: __/__/__

PART B PERMIT APPLICATION

Part B Permit Submitted: (Y) or N 11/6/80 | Final Permit Issued: __/__/__

ENFORCEMENT

Has the firm been referred to -- USEPA: (Y) or N 8/5/86

Illinois Attorney General: Y or (N) __/__/__ County State's Attorney: Y or (N) __/__/__

ORDERS ISSUED

CACO: __/__/__ CAFO: 12/17/86 Consent Decree: __/__/__

Federal Court Order: __/__/__ State Court Order: __/__/__ IPCB Order: __/__/__

TSD FACILITY ACTIVITY SUMMARY

Activity by Process Code	On Part A?	Activity Conducted Prior to 1980?	Was Activity Ever Done?	Closed	Being done at Time of Insp.?	Exempt per 35 IAC, Sec.	On Annual Report 1987	1988	1989
D81*	Y	Y	Y	N	N	N	N	N	N
S04**	Y	N	Y	N	N	N	N	N	N

* No haz-waste has been placed in LF since 1981.
** Newly regulated unit due to TC Rule.

2-1834

SUMMARY OF APPARENT VIOLATIONS

OWNER		OPERATOR	
Name	Uno-Ven Chicago Refinery	Name	Same
Address	135th + New Ave	Address	
City	Lemont	City	
State	Ill.	State	
Zip	60439	Zip	
Phone #	708-257-7761	Phone #	

PERSON(S) INTERVIEWED	TITLE	PHONE #
LEE Erchull	Sr. Enviro. Spec.	708-257-7761

INSPECTION PARTICIPANT(S)	AGENCY/TITLE	PHONE #
Mark Retzlaff	IEPA / EPS	708-345-9780

PREPARED BY	AGENCY/TITLE	PHONE #
Mark Retzlaff	" "	" "

Area	Class	Section

Area	Class	Section

Area	Class	Section

Facility Name: Uno-Ven Chicago Refinery
USEPA #: IL D041550567
IEPA #: 1978030004

10/17/90

WASTE DISPOSITION FORM

Waste Name (include haz & 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 Report for: (Circle if present; cross out if not present) * 1987	* 1988	* 1989	Amount on Site	Rate of Generation	Last Manifested Shipment	Disposition
API Separator Sludge	Clean out of API sludge separator	6/20/88	K051	Y	Y	G F	G F	G F	Ø	36 cu/yds 1989	11/27/89	Chemical Waste Management Calumet City, IL
Heat Exchange Solids	Clean out of Heat exchange units	6/25/88	K050	Y	Y	G F	G F	G F	Ø	36 cu/yds 1989	8/8/90	" "
Storm Pond Dredgings	Dried sludge from treated wastewater	5/8/90	D018	N	Y	G F	G F	G F	N/A *	Rate Varies	N/A *	N/A *
						G F	G F	G F				
* Waste is regulated due to TC Rule. No waste has been sent off-site since it became a regulated haz-waste.						G F	G F	G F				
						G F	G F	G F				
						G F	G F	G F				
						G F	G F	G F				
						G F	G F	G F				
						G F	G F	G F				

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16 NOV 1990
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* All "NO" responses must be explained in narrative.

IL 532-1836

Uno-Ven Chicago Refinery
1978030004/ILD041550567
October 17, 1990

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16 NOV 1 90
IEPA/DLPC

NARRATIVE

Uno-Ven Corporation is a petroleum refinery which processes crude oil into finished petroleum products such as gasoline, fuel oils and other related products.

Hazardous Waste

1. API Separator Sludge - K051
   - Generated from the cleaning of the oil/water separator.
   - Occurs as needed, generally once per year.
   - Rate of generation is approximately 72 cu/yds per year.
   - Waste is sent to CID for land disposal.

2. Heat Exchange Solids - K050
   - Generated from cleaning and maintenance of heat exchangers.
   - Occurs once a year, amount of waste generated varies based on the number of units cleaned.
   - 36 cu/yds were generated for 1989.
   - Waste is sent to CID for land disposal.

3. Storm Pond Dredgings - D018
   - Dried sludge from waste water treatment and storm water dredgings.
   - Since May of 1990, have generated about 13,000 cu/yds.
   - None has been sent off-site for disposal as of this inspection.

Hazardous Waste Units

1. Land Application Area D81

   There are three landfarming units located on the facility's northeast side. API separator sludge (K051) was applied to these areas from November of 1980 to September of 1981. A closure plan for these areas was approved on August 31, 1988. Per Lee Erchull, the Phase 1 sampling activities for closure have recently been completed. The facility is expected to complete the closure in approximately 2 or 3 years.

2. Surface Impoundment S04
   - 3.2 acre area.
   - Stored API separator sludge in 1980-81.
   - Closure inspection was conducted by Charles Gruntman of IEPA on 4-13-87.
   - Currently, storm pond dredgings, a D018 TC waste are stored at this location.
   - Approximately 13,000 cu/yds are presently in this unit.

Hazardous Waste Accumulation Area

A staging area is located on the south end of the plant. No waste was in this area at the time of the inspection.

From the information obtained during this inspection, it appears that Uno-Ven is a fully regulated generator and disposal facility.

Note 1: Uno-Ven no longer accepts hazardous waste, however, due to the TC rule that went into effect; the storm pond dredgings are now a D018 waste and are stored in a surface impoundment.

Note 2: Effective December 1, 1989, a change to ownership occurred forming a partnership with a Venezualan Oil Company. The present name is Uno-Ven and their Part A is being ammended to show the change.

Apparent Violations

No apparent violations were observed during this inspection. Subparts F, G, & H were not addressed during the December 28, 1989 inspection.

MR:lb:07301

RCRA LAND DISPOSAL RESTRICTION INSPECTION

Facility: UNO-VEN

U.S. EPA I.D. No. : ILD 041 550 567 / 1978030004

Street: 135th + New Ave.

City: Lemont State: IL. Zip: 60439

Telephone: 708-257-7761

Owner/Operator:

Street: - Same as above -

City: State: Zip:

Telephone:

Inspection Date: 10/17/90 Time: 10:00 - 12:00

Weather Conditions: Clear, 80°F

	Name	Agency/Title	Telephone
Inspectors:	Mark Retelaff	IEPA/EPS	708.345.9780
Facility Representative:	LEE Erchull	Sr. Envir. Spec.	708.257.7761

	Generate	Transport	Treat	Store	Dispose
F-Solvent					
Dioxin					
California List					
First Third	✓				
Second Third					

Revised 10-20-89

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INSPECTION SUMMARY

Processes That Generate LDR Wastes

LDR Waste Management

Summary See attach narrative.
& - no apparent violations -

Revised 10-20-89

Uno-Ven Chicago Refinery
1978030004/ILD041550567
October 17, 1990

NARRATIVE

Uno-Ven Corporation is a petroleum refinery which processes crude oil into finished petroleum products such as gasoline, fuel oils and other related products.

Hazardous Waste

1. API Separator Sludge - K051
   - Generated from the cleaning of the oil/water separator.
   - Occurs as needed, generally once per year.
   - Rate of generation is approximately 72 cu/yds per year.
   - Waste is sent to CID for land disposal.

2. Heat Exchange Solids - K050
   - Generated from cleaning and maintenance of heat exchangers.
   - Occurs once a year, amount of waste generated varies based on the number of units cleaned.
   - 36 cu/yds were generated for 1989.
   - Waste is sent to CID for land disposal.

3. Storm Pond Dredgings - D018
   - Dried sludge from waste water treatment and storm water dredgings.
   - Since May of 1990, have generated about 13,000 cu/yds.
   - None has been sent off-site for disposal as of this inspection.

Hazardous Waste Units

1. Land Application Area D81

   There are three landfarming units located on the facility's northeast side. API separator sludge (K051) was applied to these areas from November of 1980 to September of 1981. A closure plan for these areas was approved on August 31, 1988. Per Lee Erchull, the Phase 1 sampling activities for closure have recently been completed. The facility is expected to complete the closure in approximately 2 or 3 years.

2. Surface Impoundment S04
   - 3.2 acre area.
   - Stored API separator sludge in 1980-81.
   - Closure inspection was conducted by Charles Gruntman of IEPA on 4-13-87.
   - Currently, storm pond dredgings, a D018 TC waste are stored at this location.
   - Approximately 13,000 cu/yds are presently in this unit.

Hazardous Waste Accumulation Area

A staging area is located on the south end of the plant. No waste was in this area at the time of the inspection.

From the information obtained during this inspection, it appears that Uno-Ven is a fully regulated generator and disposal facility.

Note 1: Uno-Ven no longer accepts hazardous waste, however, due to the TC rule that went into effect; the storm pond dredgings are now a D018 waste and are stored in a surface impoundment.

Note 2: Effective December 1, 1989, a change to ownership occurred forming a partnership with a Venezualan Oil Company. The present name is Uno-Ven and their Part A is being ammended to show the change.

Apparent Violations

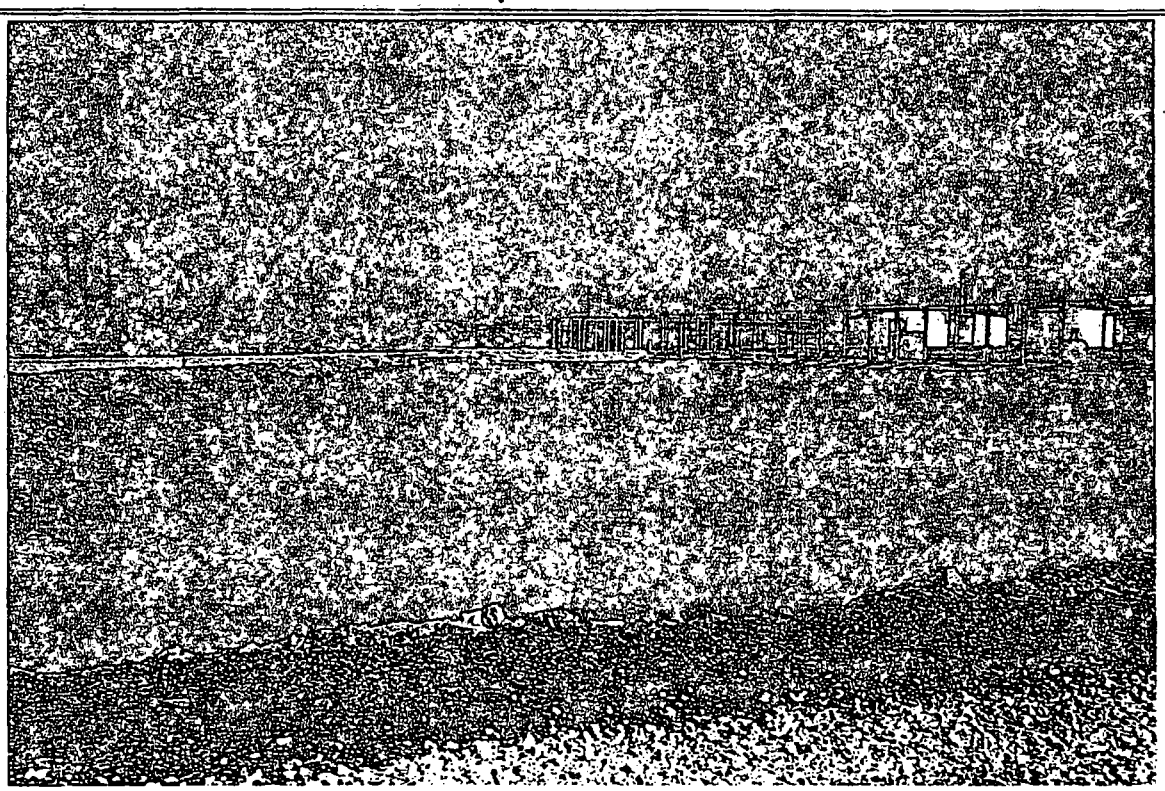
No apparent violations were observed during this inspection. Subparts F, G, & H were not addressed during the December 28, 1989 inspection.

MR:lb:07301

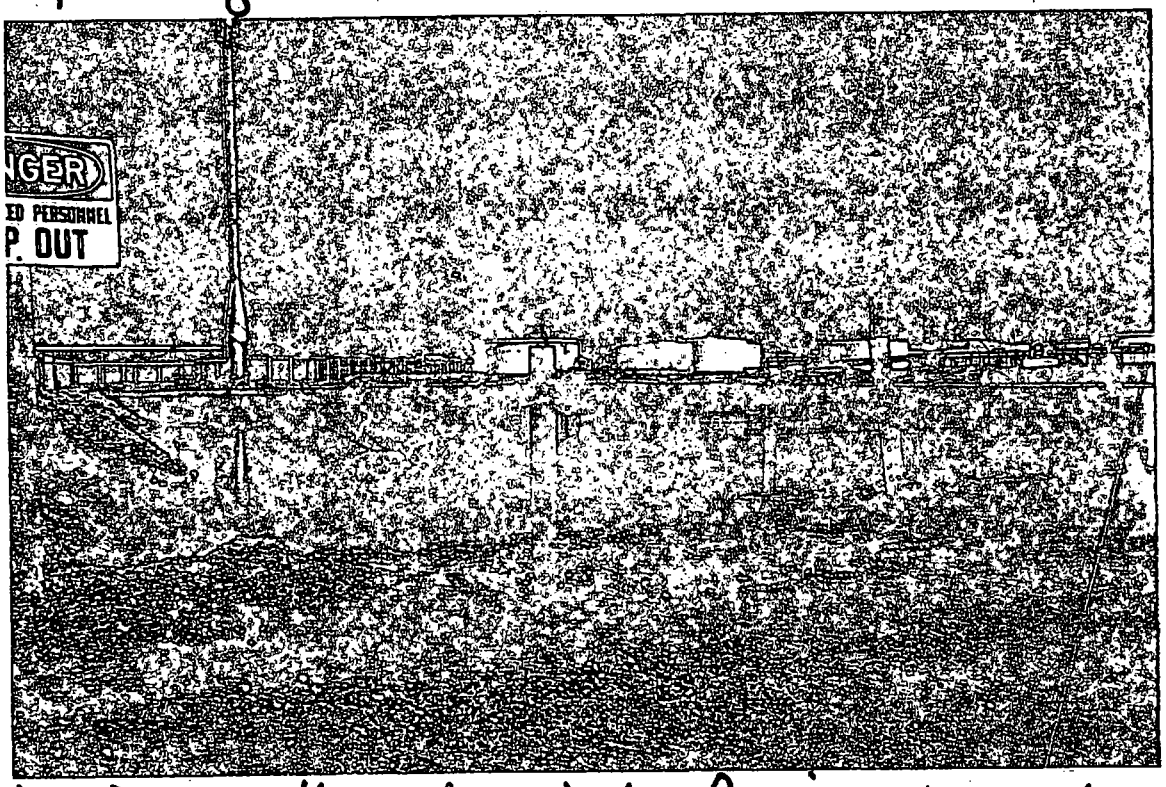
Illinois Environmental Protection Agency Photographs

Site Name: UNO-VEN Site #: 1978030004

Date: 10-17-90 Time: 10:00am-12:00pm Photograph By: Mark Retelaff



Comments: Looking north at NW Basin where storm pond dredgings originate. Roll #: 91-128 Photo #: 1



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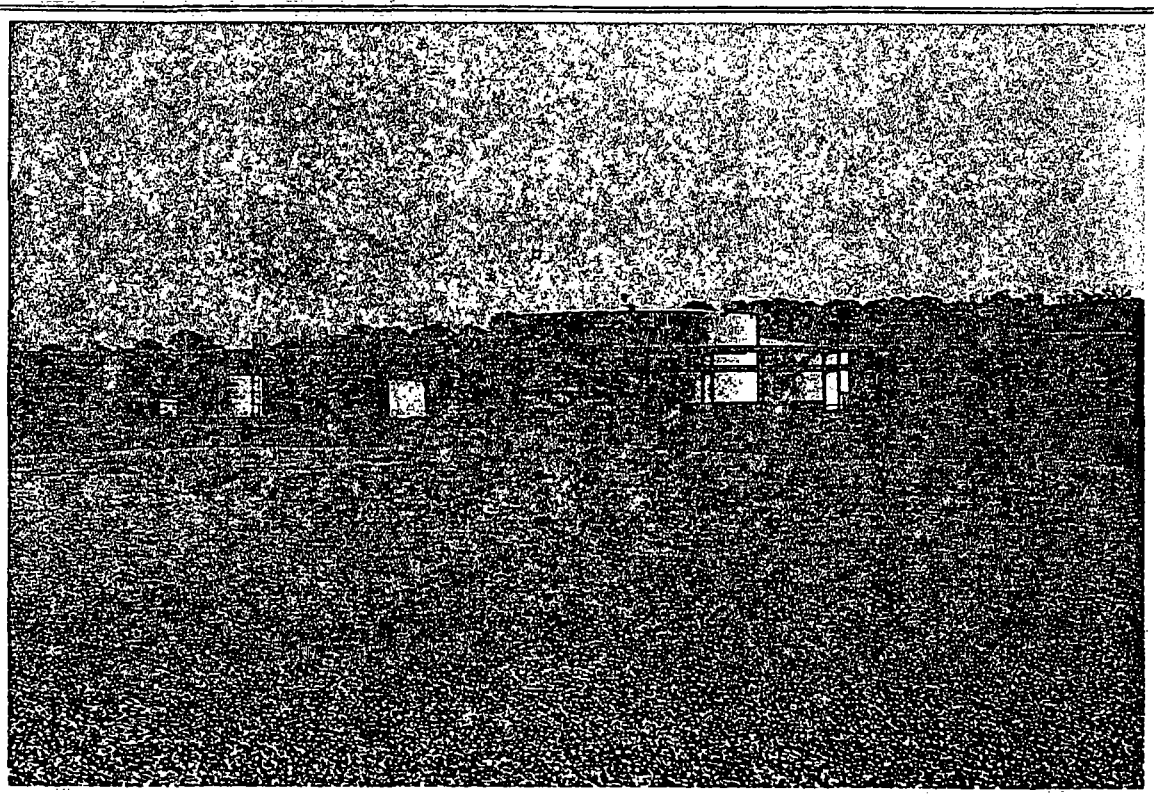
Comments: Looking north at North Basin where storm pond dredgings originate. Roll #: 91-128 Photo #: 2

Illinois Environmental Protection Agency Photographs

Site Name: UNO-VEN Site #: 1978030004

Date: 10-17-90 Time: 10:00am-12:00pm Photograph By: Mark Retelaff



Comments: Looking south at hazardous waste staging area.

Roll #: 91-128 Photo #: 3

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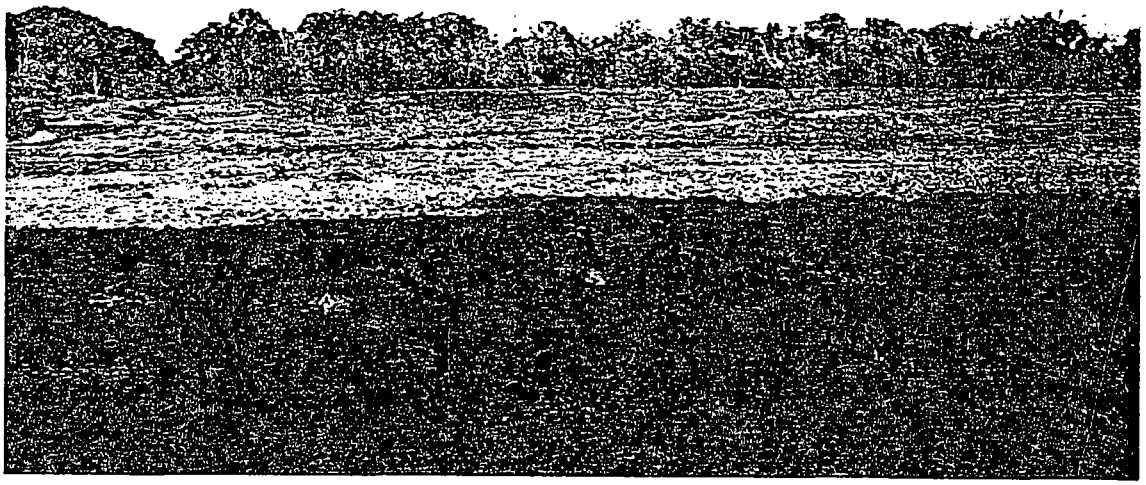


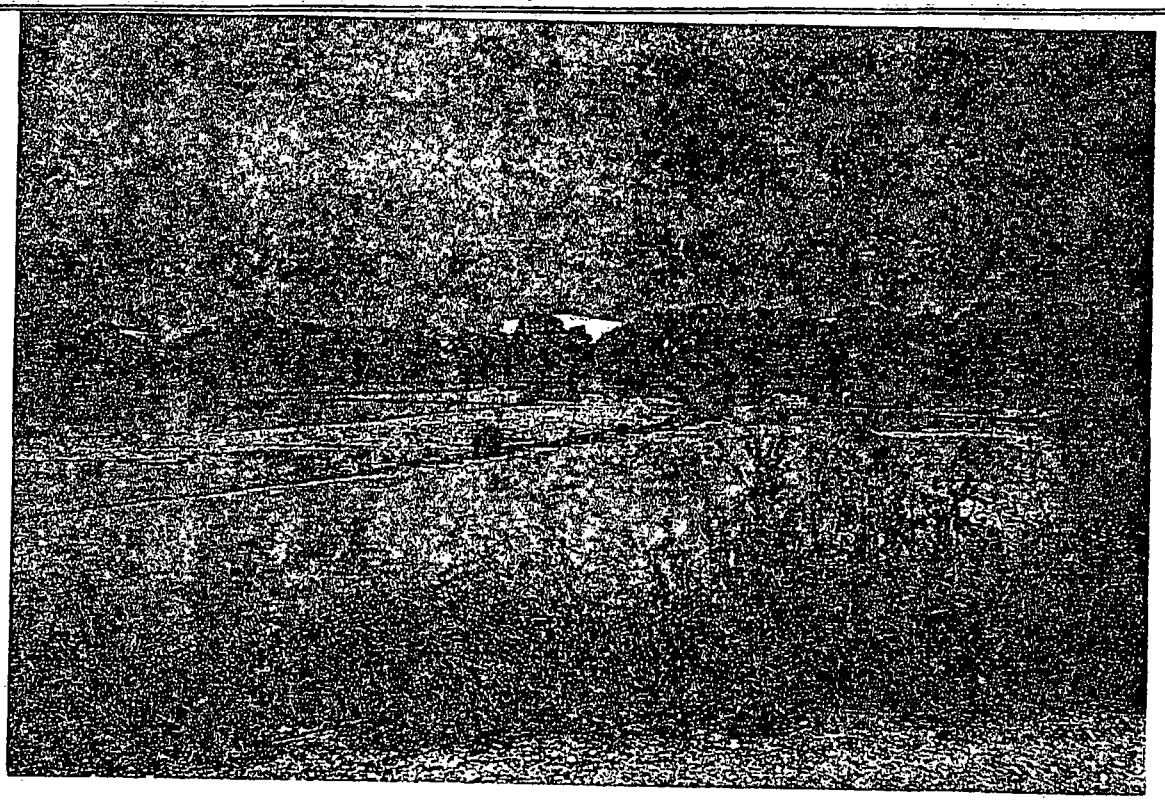
Comments: Looking NW at landfarm-West Plot.

Roll #: 91-128 Photo #: 4

Illinois Environmental Protection Agency Photographs

Site Name: UNO-VEN Site #: 1978030004

Date: 10-17-90 Time: 10:00am-12:00pm Photograph By: Mark Betelaff



Comments: North at (S04) Surface Impoundment.

Roll #: 91-128 Photo #: 5

Comments: NW at Landfarm - East Plot.

Roll #: 91-128 Photo #: 6

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Illinois Environmental Protection Agency Photographs

Site Name: UNO-VEN Site #: 1978030004

Date: 10-17-90 Time: 10:00AM-12:00pm Photograph By: Mark Retzlaff

Comments: SW at Landfarm - North plot.

Roll #: 91-128 Photo #: 7

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16 NOV 1990
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Comments:

Roll #: 91-128 Photo #:

LNO-VEN 1978030004/ILD041550567 10/17/90

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			**PART 703** **RCRA PERMIT PROGRAM** **Subpart C: Authorization by Rule and Interim Status** **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 ✓				Part-A initially filed in 11/17/80

IL 532-1592
IPC 250 8/87

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**			✓	N/A. Not a new facility
				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.**				Part A ammended on 9/18/90

IL 532-1502

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**	✔			
				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 ___				Change of ownership occurred on 12/1/89.

IL 532-1592

UNO-VEN 1978030004/ILD 041550367 10/17/90

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
				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 in 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.**			✓	N/A - Uno-cal/Uno-Ven notified as a transporter. Between 1980-1981, haz. waste was transported from process areas, 1½ blocks on public roads, to the land farm area. No haz. waste has been transported since 1981.
OTH	1			**Section 723.111: USEPA Identification Number**	✓			
			a	Has the transporter obtained a USEPA identification number?				
OTH	1	X		**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 ____				

IL 532-1592

UNO-VEN 1978030004/ILD 041550567
10/17/90

REVISION 1 (8/15/88)

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 ___				

TL 532-1502

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 ___				

IL 532-1502

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 ____				Texas
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 ____				

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LPC 256 8/87

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 ✓				No bulk shipments by water
			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 ✓				None by rail.

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**			✓	N/A - No waste ready for transport.
				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 ____				

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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			**Section 722.133: Placarding**			✓	N/a - supplied by transporter.
				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.				Facility accumulates haz. waste + stores.
				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.				-Regulated as Storage, Landfarms are not closed yet.
			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:				-SOY unit due to TC Rule.
				NOTE: If no wastes in containers, mark "N/A" and skip to Section 725.291 of the Generator checklist.				- no waste has been placed in LF since 1981.

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.				No waste on-site.
			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 ____				

Area	Class	90 Day F/U Req.	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
				FOR WASTE IN TANKS, has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subpart J: Tank Systems listed below: **NOTE: If the facility has discontinued accumulation of waste in tanks, they are subject to 725.211 and 725.214.** **NOTE: If no waste in tanks, mark N/A and skip to "For waste in containers ...", Subsection a)2) page GEN-C-14.** **Assessment of Existing Tank Systems (Section 725.291)** For tanks not protected by a secondary containment system, is an independent, certified written assessment available? Yes ____ No ____ **NOTE: Except as provided in Subsection (c) of 725.291, certified assessment must be available by 1/12/88.** Does this assessment consider at least the following: 1) available standards for the tank and ancillary equipment; 2) hazardous characteristics of the wastes; 3) existing corrosion protection measures; 4) age of the tank system; and 5) results of a leak test, internal inspection, or other tank integrity examination? Yes ____ No ____			✓	NA - To tanks no waste on-site.

IL 532-1582
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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.
			a2	**For waste in containers,** has the generator marked and made visisble for inspection on each container, the date upon which accumulation began? Yes ____ No ____ N/A ✓				N/a - no waste in containers.
			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, Subpart C: Preparedness and Prevention listed below: **Maintenance and Operation of Facility (Section 725.131)** 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 ____				See TSD Checklist

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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 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 ✓				Not needed.
			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 ✓				No actions.
			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 ✓				No. requests.

IL 532-1502
LPC 258 8/87

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**			✓	N/A - not needed.
			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?			✓	N/a. not needed.

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10/17/90
UNO-VEN 1978030004/ILD041550567

REVISION 1 (8/15/88)

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 ✓				
				NOTE: 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 ✓				

IL 532-1592
LPC 256 8/87

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 ✓				N/A - No such sources
			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 ✓				No Post-Closure
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 ____				

IL 532-1592
LPC 268 8/87

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 ✓				No changes
			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 ✓				No waste from off-site.
			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 ____				

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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.
				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 ____ NA ✓				No wastes from off-site,

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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.
				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:				No wastes from off-site
				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 ✓				

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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.
				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 ___				Guards, Video.
				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 ___				Fence
			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.				

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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	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 ___				

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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.
				- 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 ___ NA ✓				No problems.
			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 ✓				No hazards.
			d	Does the owner or operator record the results of inspections in a log or summary? Yes ✓ No ___				
			d	Does the inspection record include: - The date and time of the inspection? Yes ✓ No ___ - The name of the inspector? 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.
				- 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 ___				

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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
				B) Key parameters for automatic waste feed cutoff systems? Yes ____ No ____ N/A ✓				No waste feed cut-off.
				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 ____				For SO4.
				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 ____				

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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.
				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 ___				

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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	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 ___				

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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.
				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.**			✓	No - locations not used.

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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 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 ____				Alarm sys, Radio, PA sys.
			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 ____				

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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.
			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.**	✓			

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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	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 ✓				never just one employee.
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:				

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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.
				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 ____				Romeoville FD, PD. Will County PD.
				3) Agreements with State emergency response teams, emergency response contractors and equipment suppliers? Yes ✓ No ____ N/A ____				Heritage.
				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 ____				Silver Cross.
				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 ✓				No refusals.

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 ___				5-28-89 Gasoline spill.
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 ___				

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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.
				3) Unplanned sudden or non-sudden releases of hazardous waste or hazardous waste constituents to air, soil, or surface water? Yes ✓ No ___				
			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 ___				Dale Pirc Fire Chief.
			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 ___				

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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.
				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 ___				Alarm.
			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 ___				

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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	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 ✓				Never failed.
			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 ✓				No changes.
			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**	✓			Dale Pirc
				Is there an emergency coordinator on-site or on-call at all times? 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.
				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	1/2			**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.**	✓			Gasoline spill 5.28.89 leaking valve in pipeline valve. Xylene spill in 1983.

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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.
MAN	1			**PART 725** **INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES** **Subpart E: Manifest System, Recordkeeping and Reporting** **Section 725.171: Use of Manifest System**			✓	N/A - No waste accepted from off-site.
				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 ____				

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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	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 ___				

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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.
				6) A cross reference by manifest number to location and quantity of hazardous waste? Yes ____ No ____ N/A ✓				Not required.
				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 ✓				No tanks
				- 725.325 (Surface Improvements)? Yes ✓ No ____ N/A ____				
				- 725.352 (Waste Piles)? Yes ____ No ____ N/A ✓				no waste piles.
				- 725.373 (Land Treatment)? Yes ✓ No ____ N/A ____				
				- 725.441 (Incinerators)? Yes ____ No ____ N/A ✓				No incinerators.
				- 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 ✓				Not needed.

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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.
				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.**				Subpart F not addressed during inspection. No such units ↓

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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.
				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**	✓			
			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 ____ Na ✓ - The local land authority? Yes ____ No ____ N/A ✓				Closure not completed.
			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 ✓				No action/requests.

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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	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 ____				No wastes from off-site.
				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 ____				

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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
				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:				not needed.
			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 ✓				

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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 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 ✓				Closure not completed. ↓
				- 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 ___				

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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.
				- No later than 15 days after termination of interim status (unless a full operating permit was issued simultaneously)? Yes ___ No ___ N/A ✓				No termination.
				- 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 ✓				No decrees/orders.
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?				
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".				

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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 725 **INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES** **Subpart I: Use and Management of Container**				
OTH	1	X		**Section 725.271: Condition of Containers**			✓	N/A - No waste in 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?				
OTH	1	X		**Section 725.272: Compatibility of Waste with Containers**				
				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?				
OTH	1	X		**Section 725.273: Management of Containers**				
			a	Are containers of hazardous waste always closed during storage? Yes ____ No ____				
			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 ____				

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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 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**			✓	This is a newly regulated unit. They are planning to RCRA close unit. Also, are given till 1994 to retro-fit unit w/ proper technologies.
			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:				

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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.
				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.				

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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.
CLO	1			**Section 725.328: Closure and Post-Closure Care**			✓	not going through closure
				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**			✓	no 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.				

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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	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.**				

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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			**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?			✓	No incompatibles

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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 725 **INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES** **Subpart M: Land Treatment**				
OTH	1	X		**Section 725.372: General Operating Requirements**	✓			No waste disposed since 1981.
			a	Can the waste being placed in or on the land treatment facility be made less hazardous or non-hazardous by degradation, transformation or immobilization processes occurring in or on the soil? Yes ____ No ____ NA ✓				
			b	Has the owner or operator designed, constructed, and is he now operating and maintaining a run-on control system capable of preventing flow onto the active portions of the unit during peak discharge from at least a 25 year storm? Yes ✓ No ____				Drainage ditches.
			c	Has the owner or operator designed, constructed, and is he now operating a runoff management system capable of collecting and controlling a water volume at least equal to a 24 hour 25 year storm? Yes ✓ No ____				
			d	Are collection and holding facilities associated with run-on and runoff control systems being emptied or otherwise managed expeditiously after storms so as to maintain design capacity of the system? Yes ✓ No ____				
			e	Is the owner or operator managing the unit to control wind dispersal if the treatment zone contains particulate matter which may be subject to wind dispersal? Yes ____ No ____ N/A ✓				No waste disposed of since 1981.

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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			**Section 725.373: Waste Analysis**			✓	No waste placed in unit since 1981.
				Prior to placing hazardous waste in or on a land treatment facility, has the owner or operator:				
			a	1) Determined the concentration of any substances which exceed the maximum concentrations contained in Table I of Section 721.124 that cause a waste to exhibit the characteristic of EP toxicity? Yes ____ No ____				
			b	2) Determined the concentration of any substances which caused the waste to be listed as a hazardous waste in Part 721, Subpart D? Yes ____ No ____				
			c	3) Determined the concentrations in the waste of arsenic, cadmium, lead and mercury, if food chain crops are grown, unless the owner or operator has written documented data that show that the constituent is not present? Yes ____ No ____				
OTH	1	X		**Section 725.376: Food Chain Crops**			✓	No food/chain crops.
			a	Has the owner or operator made the required notice under 725.376(a) if food chain crops are being grown, have been grown, or will be grown again on the land treatment facility? Yes ____ No ____				
			b1	Is the owner or operator complying with the requirements of 725.376(b) and (c) concerning the growing of food chain crops on land treatment facilities? 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.
OTH	1	X		**Section 725.378: Unsaturated Zone (Zone of Aeration) Monitoring**	✓			
			d	Does the owner or operator have a written unsaturated zone monitoring plan and is it maintained at the facility? Yes ✓ No ___				
				Has the owner or operator implemented his unsaturated zone monitoring plan? Yes ✓ No ___				
OTH	2			**Section 725.379: Recordkeeping**	✓			
				Is the owner or operator including the date and rate of application of hazardous waste in the operating record? Yes ✓ No ___				
CLO	1			**Section 725.380: Closure and Post-Closure**			✓	
				NOTE: Determine compliance or non-compliance with this Section only in conjunction with a closure verificiation inspection conducted after the facility and its independent registered professional engineer (or independent qualified soil scientist) have certified closure in accordance with an approved closure and post-closure plan.				Closure not completed.
				Has the land treatment facility been closed in accordance with an approved closure plan? Yes ___ No ___				- going through Closure.

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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			**Section 725.381: Special Requirements for Ignitable or Reactive Wastes**			✓	No land treatment of these wastes.
			a	Have ignitable or reactive wastes been land treated by immediately incorporating them into the soil 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 ____				
			b	Is the waste managed in such a way that it is protected from any material or conditions which may cause it to ignite or react? Yes ____ No ____ N/A ____				
OTH	1			**Section 725.382: Special Requirements for Incompatible Wastes**			✓	
				Is the owner or operator complying with the requirements concerning the land treatment of incompatible wastes or incompatible wastes and materials contained in this Section? Yes ____ No ____				

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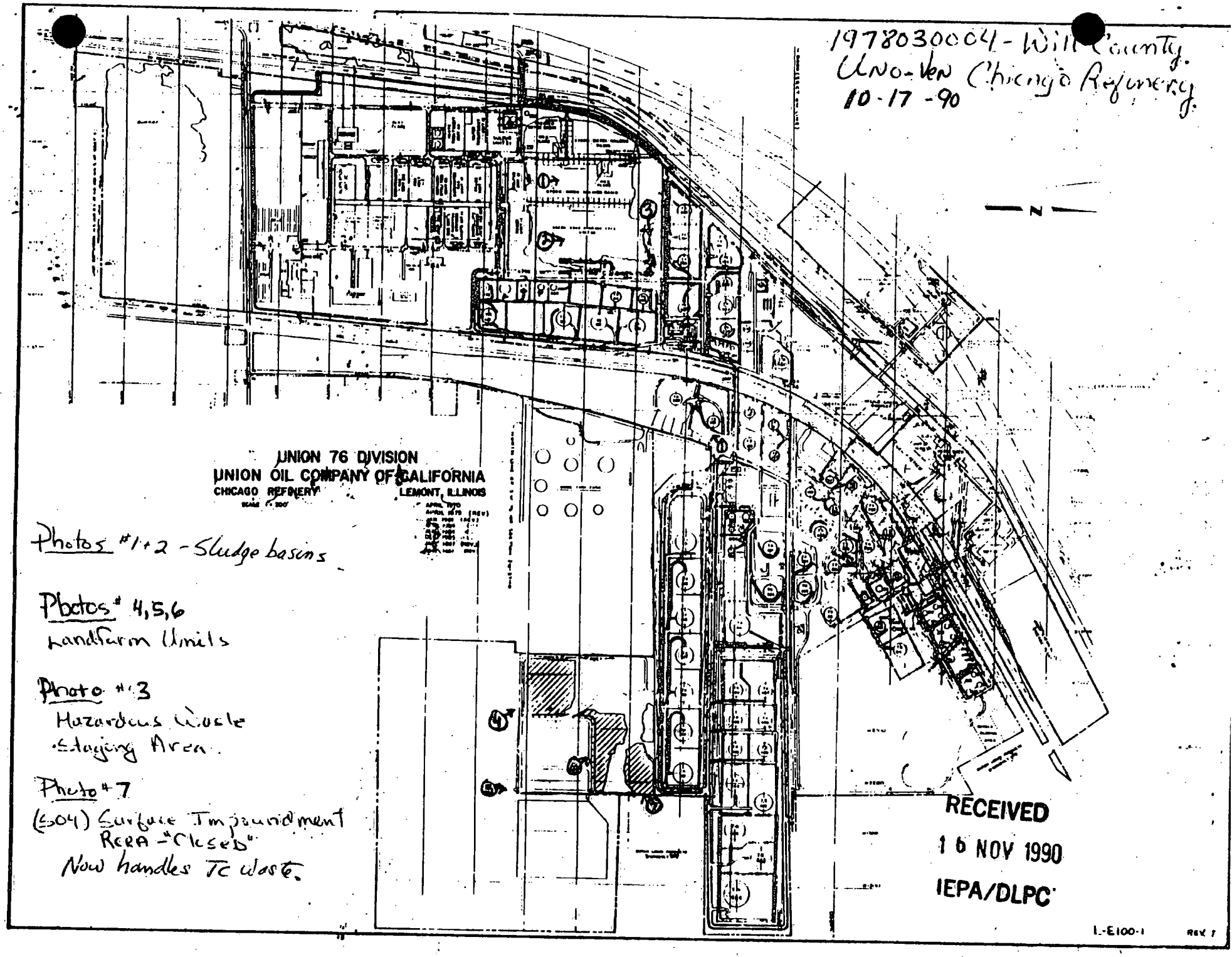
1978030004 - Will County
Uno-Ven Chicago Refinery
10-17-90



Photos #1+2 - Sludge basins

Photos # 4,5,6
Landfarm Units

Photo #3
Hazardous Waste
Staging Area

Photo #7
(S04) Surface Impoundment
RCRA - "Closed"
Now handles TC waste.

RCRA LAND DISPOSAL RESTRICTION INSPECTION

WASTE IDENTIFICATION

1. Does the facility handle the following wastes?

   a. F001 through F005 spent solvents

      Yes ___ No ✓ List* _____

   b. Dioxin-containing Wastes

      Yes ___ No ✓ List* _____

   c. California List Wastes

      Yes ___ No ✓ List* _____

   d. First and Second Third Wastes

      Yes ✓ No ___ List* K050, K051

   * List wastes if room allows or attach Appendix A.

   Note: Please be aware of potential misclassification of wastes (i.e., California list/"soft hammer"/characteristic waste applicabilities).

2. Does the facility handle the following wastes (national capacity variances)?

   a. F001 - F005 contaminated soil or debris resulting from a CERCLA response action or RCRA corrective action (effective date — 11/08/90).

      Yes ___ No ✓ Comments _____

   b. Dioxin contaminated soil and debris resulting from a CERCLA response action or a RCRA corrective action (effective date — 11/08/90).

      Yes ___ No ✓ Comments _____

   c. California list contaminated soil or debris resulting from a CERCLA response action or a RCRA corrective action (effective date — 11/08/90).

      Yes ___ No ✓ Comments _____

d. First Third wastes with the following waste codes: K048, K049, K050, K051, K052, or K071 (effective date - 08/08/90).

Yes ✓ No ___ Comments K050, K051

e. First Third contaminated soil and debris which have a treatment standard based on incineration - K016, K018, K019, K020, K022, K024, K030, K037, K048-K052, K086, K087, K101, K102, K103, and K104 (effective date — 08/08/90).

Yes ___ No ✓ Comments _____

f. Second Third contaminated soil and debris which have a treatment standard based on incineration - F010, F024, K009, K010, K011, K013, K014, K023, K027, K028, K029, K038, K039, K040, K043, K093, K094, K095, K096, K113, K114, K115, K116, P039, P040, P041, P043, P044, P062, P071, P085, P089, P094, P097, P109, P111, U028, U058, U069, U087, U088, U102, U107, U109, U221, U223, U235 (effective date — 06/08/91).

Yes ___ No ✓ Comments _____

RCRA LAND DISPOSAL RESTRICTION INSPECTION

GENERATOR CHECKLIST

GENERATOR REQUIREMENTS

A. Treatability Group - Treatment Standards Identification

1. F-Solvent Wastes: Does the generator correctly determine the appropriate treatability group of the waste?

   Yes ___ No ___ NA ✓

   If yes, check the appropriate treatability group.

   ___ Wastewaters containing solvents (less than or equal to 1% total organic carbon (TOC) by weight)
   ___ All other spent solvent wastes

2. First and Second Third Wastes: Does the generator correctly determine the appropriate treatability group of the waste?

   Yes ✓ No ___ NA ___

   If yes, list the waste code and check the correct treatability group.

Waste Code	Wastewater*	Non-wastewater
K050		✓
K051		✓

* Less than 1% TOC by weight and less than 1% filterable solids.

3. California List Wastes: Has the generator correctly identified the required treatment technology [268.42]?

   a. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 50 but less 500 ppm, is the treatment in accordance with existing TSCA thermal treatment regulations for burning in high efficiency boilers (40 CFR 761.60) or incineration (40 CFR 761.70)?

      Yes ___ No ___ NA ✓

      If yes, specify the method: _____

b. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 500 ppm, is the waste incinerated [40 CFR 761.70] or disposed of by other approved alternate methods [40 CFR 761.60(e)]?

Yes ___ No ___ NA ✓

If an alternative method is used, specify the method and state whether the facility has received approval from the Regional Administrator or Director, Exposure Evaluation Division, for an exemption from the incineration requirement:

___

___

___

c. For hazardous waste that contains halogenated organic compounds (HOCs) in total concentrations greater than or equal to 1,000 mg/L or 1,000 mg/Kg (except dilute HOC wastewater), is the waste incinerated in accordance with existing requirements of 40 CFR Part 264 Subpart O or 40 CFR Part 265 Subpart O?

Yes ___ No ___ NA ✓

4. Does the generator mix restricted wastes with different treatment standards?

Yes ___ No ✓ Comments ___

If yes, did the generator select the most stringent treatment standards (268.41(b), 268.43(b))?

Yes ___ No ___ Comments ___

B. Waste Analysis

1. Does the generator determine whether the restricted waste exceeds treatment standards or prohibition levels at the point of generation by:

- Knowledge of waste Yes ✓ No ___

List the wastes for which "applied knowledge" was used and describe the basis of the applied knowledge determination.

Have waste analysis

2. Off-Site Management

a. Does the generator ship any waste that exceeds the treatment standards to an off-site treatment or storage facility?

Yes ___ No ✓ (If no, go to b)

If yes, identify waste code and off-site treatment or storage facilities:

Waste Code	Facilities	Treat/Store

- Does the generator provide notification to the treatment or storage facility [268.7(a)(1)]?

Yes ___ No ___

- Does notification contain the following?

EPA Hazardous waste number(s)	Yes ___	No ___
Applicable treatment standards and prohibition levels	Yes ___	No ___
Manifest number	Yes ___	No ___
Waste analysis data, if available	Yes ___	No ___

b. Does the facility ship any waste that meets the treatment standards to an off-site disposal facility?

Yes ✓ No ___ (If no, go to c)

If yes, identify waste code and off-site disposal facilities:

Waste Code	Facility
K050	CID - Calumet City, IL.
K051	CID - Calumet City, IL.

Was all supporting data retained on-site, [268.7(a)(5)]?

Yes ✓ No ___

- TCLP Yes ___ No ___ NA ✓

List the wastes for which TCLP was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results.

___

___

___

- Total constituent analysis Yes ✓ No ___ NA ___

List the wastes for which total constituent analysis was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results.

K050- 6/25/88

K051- 6/20/88

___

- pH ≤ 2 Yes ___ No ___ NA ✓

List the wastes for which pH testing was used.

___

- Paint Filter Liquid Test Yes ___ No ___ NA ✓

List the wastes for which PFLT was used.

___

2. Does the facility dilute the restricted waste as a substitute for adequate treatment [268.3]?

Yes ___ No ✓ NA ___

C. Management

1. On-Site Management

Is restricted waste treated, stored for greater than 90 days, or disposed on-site?

Yes ___ No ✓ Comments ___

If yes, the TSD Checklist must be completed.

- Does the facility provide notification and certification to the disposal facility [268.7(a)(2)]?

  Yes ✓ No ___

- Does notification contain the following?

EPA Hazardous waste number(s)	Yes ✓	No ___
Applicable treatment standards and prohibition levels	Yes ✓	No ___
Manifest number	Yes ✓	No ___
Waste analysis data, if available	Yes ✓	No ___
Certification that the waste meets treatment standards [wording in 268.7(a)(2)(ii)]	Yes ✓	No ___

c. Is the waste subject to a nationwide variance, case-by-case extension (268.5), or no migration petition (268.6).

  Yes ___ No ✓ (If no, go to d)

- If yes, does the generator provide notification to the off-site receiving facility that the waste is not prohibited from land disposal [268.7(a)(3)]?

  Yes ___ No ___

- Does the notification contain the following information?

EPA hazardous waste number	Yes ___	No ___
The corresponding treatment standards and all applicable prohibitions	Yes ___	No ___
Manifest number	Yes ___	No ___
Waste analysis data, if available	Yes ___	No ___
Date the waste is subject to the prohibitions	Yes ___	No ___

d. Does the facility generate any First or Second Third "soft hammer" waste?

  Yes ✓ No ___ (If no, go to 4)

- Does the generator provide the following notification to the receiving facility with each shipment of waste [268.7(a)(4)]?

(i)	EPA hazardous waste number	Yes ✓	No ___
(ii)	Applicable prohibition [268.33(f), 268.34(h)]	Yes ✓	No ___
(iii)	Manifest number	Yes ✓	No ___
(iv)	Waste analysis data, if available	Yes ✓	No ___

3. "Soft Hammer" Demonstrations/Certifications

a. Are any "soft hammer" wastes or treatment residues destined for ultimate disposal in a landfill or surface impoundment?

Yes ✓ No ___

b. Has the generator attempted to locate and contract with treatment and recovery facilities that provide treatment that yields the greatest environmental benefit [268.8(a)(1)]?

Yes ✓ No ___

c. Has the generator submitted a demonstration and certification to the Regional Administrator to document its efforts to locate practically available treatment [268.8(a)(2)]?

Yes ✓ No ___

- If yes, did the generator submit the documentation and certification prior to first shipment?

Yes ✓ No ___

d. Does the demonstration contain the following information?

A list of facilities and facility officials contacted?	Yes ✓	No ___
Addresses	Yes ✓	No ___
Telephone numbers	Yes ✓	No ___
Contact dates	Yes ✓	No ___
Certification statement	Yes ✓	No ___

Attach a copy of the demonstration and certification.

e. If there is no practically available treatment, has the generator included with the demonstration, a written discussion of why the generator was not able to obtain treatment or recovery for that waste [268.8(a)(2)(i)]?

Yes ___ No ___ NA ✓

If yes, attach a copy of written discussion.

f. Does the generator ship its "soft hammer" waste off-site for treatment?

Yes ✓ No ___

Describe the type of treatment and treatment facilities:

Waste Code	Type of Treatment	Treatment Facility
K050	Bound up	CID
K051	Bound up	CID

g. Did the generator send a copy of its demonstration and certification to the receiving facility with the first shipment of waste?

Yes ✓ No ___

h. Does the generator provide certification with each subsequent shipment of wastes to receiving facilities?

Yes ✓ No ___ NA ___

4. Records Retention

Does the facility retain on-site copies of all notifications, demonstrations, and certifications for a period of 5 years [268.7(a)(6)]?

Yes ✓ No ___ Comments _____

D. RCRA Corrective Action and CERCLA Response Action Waste

1. Has the facility disposed of contaminated soil and debris from a RCRA corrective action or a CERCLA response action in a landfill or surface impoundment?

Yes ___ No ✓ Comments _____

2. Did the unit meet the minimum technology requirements (double liner, leachate collection system, and ground-water monitoring)?

Yes ___ No ___ NA ✓ Comments _____

E. Treatment Using RCRA 264/265 Exempt Units or Processes

N/A

1. Is waste treated in RCRA 264/265 exempt units (i.e., boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.)?

Yes ___ No ___

List types of waste treatment units and processes:

Waste Code	Type of Treatment	Treatment Units and Processes

2. Are treatment residuals generated from these units?

Yes ___ No ___ Comments _____

If yes, the residues are subject to the LDR generator requirements.

3. Are these residuals further treated, stored for greater than 90 days, or disposed on-site?

Yes ___ No ___ NA ___ Comments _____

If yes, the TSD checklist must be completed.

RCRA LAND DISPOSAL RESTRICTION INSPECTION

TRANSPORTER CHECKLIST

TRANSPORTER REQUIREMENTS N/A

A. Does the transporter accumulate waste for more than 10 days [268.50(a)(3)]?

Yes ___ No ___

If yes, check the appropriate regulatory status:

___ Interim status for storage
___ RCRA permit for storage

If no, describe inventory controls to ensure that wastes are not stored for more than 10 days:

_____

_____

_____

B. Does the transporter mix, combine, or recontainerize wastes?

Yes ___ No ___

If yes, list the restricted wastes that have been mixed.

_____

_____

_____

C. Is the waste treated in an exempt treatment process on-site?

Yes ___ No ___

RCRA LAND DISPOSAL RESTRICTION INSPECTION

TSD CHECKLIST

TSD REQUIREMENTS N/A

A. General Facility Standards

1. Does the waste analysis plan cover Part 268 requirements [264/265.13]?

F-solvent (TCLP)*	Yes ___	No ___	NA ___
Dioxin (TCLP)	Yes ___	No ___	NA ___
California List (PFLT and/or total constituent analysis)*	Yes ___	No ___	NA ___
First & Second Third (TCLP and/or total constituent analysis)	Yes ___	No ___	NA ___

* TCLP= Toxicity Characteristic Leaching Procedure (268, App. I)
PFLT= Paint Filter Liquids Test (SW-846)

2. Does the facility obtain representative chemical and physical analyses of wastes and residues?

Yes ___ No ___ Comments _____

a. What date was the waste analysis plan last revised?

_____

b. Are analyses conducted on-site or off-site?

_____ On-site _____ Off-site

Identify off-site lab: _____

_____

_____

c. Are F-solvent and dioxin containing waste analyzed using TCLP?

Yes ___ No ___ NA ___

d. Are California List wastes analyzed using the appropriate analytical method (PFLT filtrate for metals and cyanide; total constituent analysis for corrosive wastes, PCBs and halogenated organic compounds (HOCs).

Yes ___ No ___ NA ___

e. Are First Third and Second Third wastes analyzed using the appropriate analytical method for the specified BDAT* (i.e., total constituent analysis for destruction technologies and TCLP for stabilization/fixation technologies)? See Appendix B.

Yes ___ No ___ NA ___

* BDAT= best demonstrated available technology

3. Are the operating records, including analyses and quantities, complete [264/265.73]?

Yes ___ No ___

4. Do operating records contain copies of the notification, certification, and demonstration (if applicable) from the generator? Records must be kept until closure of unit.

Yes ___ No ___ Comments _____

B. Storage (268.50)

1. Are prohibited wastes* stored on-site?

Yes ___ No ___ (If no, go to C, Treatment.)

* Prohibited wastes are a subset of restricted wastes, i.e., they are those restricted wastes that are currently ineligible for land disposal [53 FR 31208, August 17, 1988].

2. If yes, identify storage unit.

_____ Tanks
_____ Containers
_____ Other (Identify inappropriate storage unit(s).

_____

3. Are all containers clearly marked to identify the contents and date(s) entering storage [268.50(a)(2)]?

Yes ___ No ___ NA ___

4. Do operating records track the location, quantity of the wastes, and dates that the wastes enter and leave storage (264/265.73)?

   Yes ___ No ___

5. Do operating records agree with container labeling [268.50(a)(2) and 264/265.73]?

   Yes ___ No ___ NA ___

6. Have tanks been emptied at least once per year since the applicable LDR regulations went into effect?

   Yes ___ No ___ NA ___

   If yes, do the operating records show that the volume of waste removed from tanks annually equals or is greater than the tank volume?

   Yes ___ No ___

7. Are all tanks clearly marked with a description of the contents, the quantity of wastes received, and date(s) entering storage, or is such information recorded and maintained in the operating record [268.50(a)(2)]?

   Yes ___ No ___ NA ___

8. Have wastes been stored for more than 1 year since the applicable LDR regulations went into effect [268.50(c)]?

   Yes ___ No ___ NA ___

   If yes, can the facility show that such accumulation is necessary to facilitate proper recovery, treatment, or disposal?

   Yes ___ No ___ NA ___

   If yes, state how: _____

9. Has liquid hazardous waste containing PCBs at concentrations greater than or equal to 50 ppm being stored:

   a. In a facility meeting the TSCA criteria in 761.65(b)?

      Yes ___ No ___ NA ___

   b. More than one year [268.50(f)]?

      Yes ___ No ___ NA ___

C. Treatment

1. Does the facility treat restricted wastes other than in surface impoundments?

   Yes ___ No ___ (If no, go to D, Surface Impoundments.)

2. Describe the waste codes and treatment processes:

Waste Code	Treatment Processes
_____	_____
_____	_____
_____	_____

3. Was dilution used as a substitute for treatment [268.3]?

   Yes ___ No ___ Comments _____

4. Does the facility, in accordance with an acceptable waste analysis plan, test the residue from all treatment processes [268.7(b)]?

   Yes ___ No ___ Comments _____

   Have treatment standards or prohibition levels been met?

   Yes ___ No ___ Comments _____

5. Does the facility ship any waste or treatment residue to an off-site disposal facility?

   Yes ___ No ___ NA ___

   If yes, does the treatment facility provide notification and certification to the disposal facility [268.7(b)(4) and (5)]??

   Yes ___ No ___ (If yes, the Generator portion of the checklist must be completed.)

6. If the waste or treatment residue will be further managed at a different treatment or storage facility, has the facility complied with the generator notice and certification requirements [268.7(a)]?

   Yes ___ No ___

7. Does the facility treat "soft hammer" wastes?

Yes ___ No ___ (If no, go to 8.)

a. If yes, is the waste treated in accordance with the generator's certification/demonstration [268.8(c)(1)]?

Yes ___ No ___

b. Did the treatment facility certify that the "soft hammer" waste was treated in accordance with the generator's demonstration, [268.8(c)(1)]?

Yes ___ No ___

8. Does the facility ship any "soft hammer" waste to an off-site treatment, recovery, disposal or storage facility?

Yes ___ No ___ NA ___

If yes, does the treatment facility send a copy of the generator's "soft hammer" demonstration and certification to the receiving treatment, recovery, disposal or storage facility along with its treatment certification [268.8(c)(2)]?

Yes ___ No ___ NA ___

Identify waste codes and off-site facilities:

Waste Code	Facility

9. Are notifications, demonstrations, certifications (if applicable), and results of waste analysis prepared by the generators, kept in the operating record until facility closure [264/265.73(b)]?

Yes ___ No ___

D. Surface Impoundments N/A

1. Are prohibited wastes placed in surface impoundments for treatment?

   Yes ___ No ___ List _____ (If no, go to E, Land Disposal.)

2. Are evaporation or dilution the only recognizable treatment occurring in the surface impoundment?

   Yes ___ No ___

3. Did the facility submit to the Agency, the waste analysis plan, as well as, the certification of compliance with minimum technology and ground-water monitoring requirements?

   Yes ___ No ___

4. If the minimum technology requirements have not been met, has a waiver been granted for that unit?

   Yes ___ No ___ NA ___

5. Have the Subpart F groundwater monitoring requirements been met?

   Yes ___ No ___ NA ___

6. Are representative samples of the sludge and supernatant from the surface impoundment tested separately, acceptably, and in accordance with the sampling frequency and analysis specified in the waste analysis plan?

   Yes ___ No ___

   Attach test results.

7. Do the hazardous waste residues (sludges or liquids) exceed the treatment standards specified in 40 CFR 268, or where no treatment standards are established for a waste, the applicable prohibition levels?

   Sludge Yes ___ No ___ Waste Code _____

   Supernatant Yes ___ No ___ Waste Code _____

8. Provide the frequency of analyses conducted on treatment residues:

   _____
   _____
   _____

9. Does the operating record adequately document the results of waste analyses performed in accordance with 40 CFR 268?

   Yes ___ No ___

10. Are sludge residues that exceed the treatment standards and/or prohibition levels removed adequately on an annual basis?

    Yes ___ No ___ Comments _____

    a. Are adequate precautions taken to protect liners, and do records indicate that liner integrity is inspected?

       Yes ___ No ___

    b. Are residues subsequently managed in another surface impoundment?

       Yes ___ No ___

    c. Are residues treated prior to disposal?

       Yes ___ No ___ Comments _____

       If yes, are waste residues treated on-site or off-site?

       On-site _____ Off-site _____

       Identify waste code and treatment method:

Waste Code	Treatment Method

11. If supernatant is determined to exceed treatment standards, is annual throughput greater than impoundment volume?

    Yes ___ No ___ Comments _____

E. Land Disposal N/A

1. Are restricted and/or prohibited wastes placed in land disposal units such as landfills, surface impoundments, waste piles, land treatment units, salt domes/beds, mines/caves, concrete vaults, or bunkers?

   Yes ___ No ___

   Note: Do not include surface impoundments addressed in D, Surface Impoundments.

   If yes, specify which units and what wastes each unit has received:

   _____

   _____

   _____

2. Does the facility's operating record contain notices, certifications, and "soft hammer" demonstrations from generators/storers/treaters? These records must be maintained until facility closure.

   Yes ___ No ___

3. Does the facility obtain waste analysis data or test the wastes (according to the waste analysis plan) to determine that the wastes comply with the applicable treatment standards [268.7(c)]?

   Yes ___ No ___

   If yes, at what frequency? _____

   _____

   _____

4. If prohibited wastes that exceed the treatment standards are placed in land disposal units (excluding wastes subject to national capacity variances) [268.30(a)], does the facility have an approved waiver based on no migration petition [268.6], an approved case-by-case capacity extension [268.5], or variance from treatment standards [268.44]?

   Yes ___ No ___

5. Does the facility dispose of restricted wastes that are subject to a national capacity variance or the "soft hammer" provisions?

   Yes ___ No ___ Comments _____

   If yes, have the minimum technology requirements been met for all units receiving such wastes?

   Yes ___ No ___

6. Does the facility have notices [268.7(a)(3)] and records for disposed wastes that are subject to national capacity variances, case-by-case extensions [268.5], no migration petitions [268.6], or a variance from treatment standards?

   Yes ___ No ___ NA ___

7. If the facility has a case-by-case extension, is the facility making progress as described in progress reports?

   Yes ___ No ___ NA ___

8. Are restricted wastes placed in underground injection wells?

   Yes ___ No ___ List _____

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OFFICE OF RCRA
WASTE MANAGEMENT DIVISION
EPA, REGION V

Jonathan Cooper
USEPA - RCRA ENF.

APPENDIX A-1

FACILITY INSPECTION FORM FOR COMPLIANCE WITH INTERIM STATUS STANDARDS COVERING GROUNDWATER MONITORING

General Information

USEPA Number: ILD041550567 IEPA Number: 1978030004

Major Facility: YES/NO Notified As: GEN./TSD Regulated As: GEN./TSD

Facility Name: UNOCAL

Street: 135th & NEW Avenue

City: Lemont State: Illinois Zip Code: 60439

Phone: (312) 257-7761 County: Will

Facility Contact Official: Leo Erchull Branch/Organization:

Title: Env. Science Analyst

Region: 2 Date of Inspection: 07/18/89 Time: (From) 3:00pm (To) 4:05pm

Type of Inspection: (GWM) RR F/U ___/___/___ (Date of Initial Inspection)

Site inspection to observe the plugging procedures for the MW-series monitoring wells.

Preparer Information:

Name: Gino S. Bruni

Agency/Title: IEPA/EPS III

Telephone: (312) 345-9780

Section	Class I	Class II
TOTAL Class I's & II's		

	YES	NO	UNKNOWN	WAVIED
Type of facility: (check appropriately)				
a) surface impoundment		✓		
b) landfill		✓		
c) land treatment facility	✓			
d) disposal waste pile*		✓		
Groundwater Monitoring Program				
1. Was the groundwater monitoring program reviewed prior to site visit? if "NO",	✓			
a) Was the groundwater program reviewed at the facility prior to site inspection?	N/A			
2. Has a groundwater monitoring program (capable of determining the facility's impact on the quality of groundwater in the uppermost aquifer underlying the facility) been implemented? 725.190(a)	✓			

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*Listed separate from landfill for convenience of identification.

IL 532-1344
IPC 105 4/85

NARRATIVE

On July 18, 1989, Doug Koester and I conducted a site inspection to observe the plugging procedures for the MW-series PVC monitoring wells. The following individuals were present: Jeff Starks (ENSR), John Cooper (USEPA), Doug Koester, and I (IEPA, DLPC/FOS).

Because of the installation of the new groundwater monitoring system, Unocal is plugging the MW-series monitoring wells. The MW-series monitoring wells were installed prior to the existence of any guidance. Unocal is following the IEPA monitor well plugging procedures.

We began observing D&G Drilling, Inc. seal and abandon MW-9. The following was observed:

1) By the time we arrived, the concrete pad and protective casing were removed.

2) A five foot section of steel casing was driven around MW-9. A narrow pipe with a cutting blade was lowered into the PVC riser pipe. The pipe would rotate causing the PVC to be shredded. Water was used to flush the PVC shreds to the surface.

3) The cutting tool was slipping away from the center of the PVC riser pipe.

We did not observe the completion of the plugging of MW-9. We left the site at approximately 4:05 p.m.

GSB:pgb:1668P

cc: Maywood Region
Angela Aye Tin
Jonathan Cooper, USEPA-RCRA
Enforcement, Region V

Chromium (mg/L)
Total
Dissolved

Lead (mg/L)
Total
Dissolved

Mercury (mg/L)
Total
Dissolved

Selenium (mg/L)
Total
Dissolved

Silver (mg/L)
Total
Dissolved

Iron (mg/L)
Total
Dissolved

Manganese (mg/L)
Total
Dissolved

Sodium (mg/L)
Total
Dissolved

PH
Specific Conductance
Temperature

Gross Alpha (pci/L)

Gross Beta (pci/L)

Total Radium (pci/L)

Phenols (mg/L)

Endrin (mg/L)

Lindane (mg/L)

Methoxychlor (mg/L)

Toxaphene (mg/L)

2,4-D (mg/L)

2,4,5-TP (Silvex)
(mg/L)

TOC (mg/L)

TOX (mg/L)

UNOCAL appears to be in general compliance with the implementation of their sampling and analysis plan.

GB:lb:00501

cc: Maywood Region

Date: 07-18-89

Time: 11:00Am - 4:00pm

Photograph By:

Gino Bruni

City: Lemont

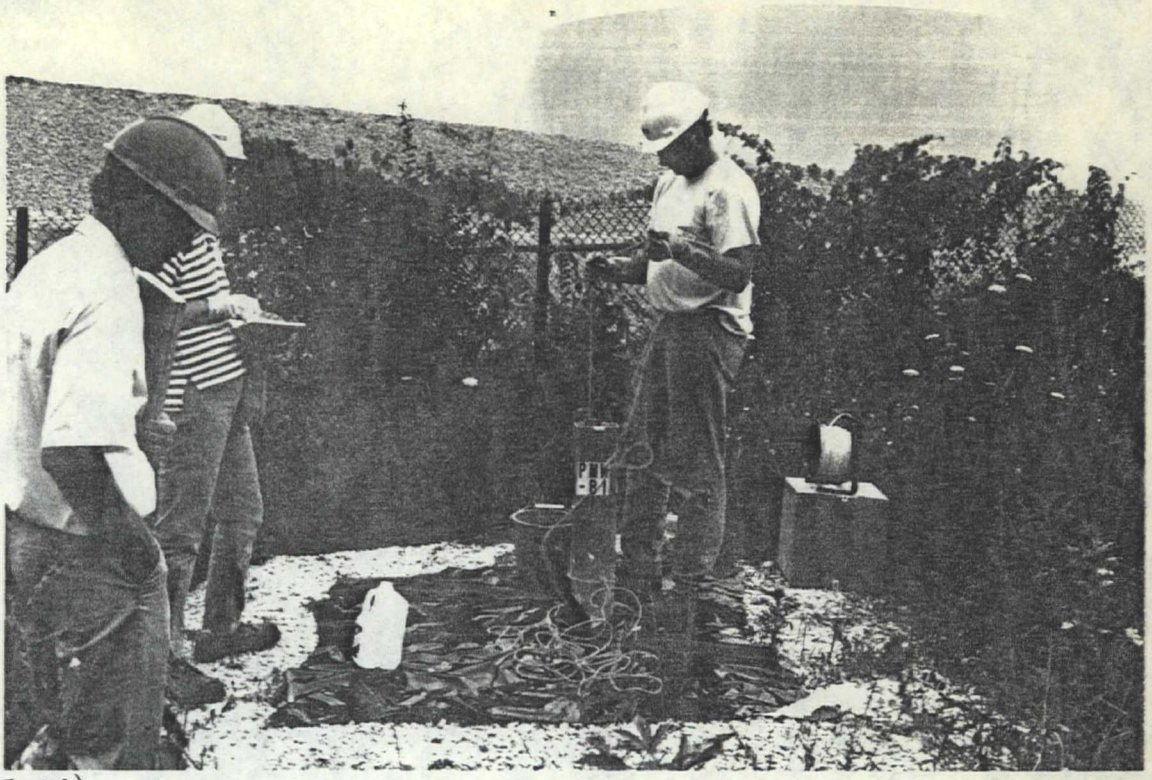
IEPA #: 1978030004

Site Name:

UNOCAL

Comments: Groundwater Monitoring Well UA5. Left to Right: John Cooper (USEPA), Marsha Koker (ENSR), and Marty Weber (ENSR)

Photo # 1 Roll # 90-17



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IEPA/DLPC

Date: 07-18-89

Time: 11:00Am - 4:00pm

Photograph By:

Gino Bruni

City: Lemont

IEPA #: 1978030004

Site Name:

UNOCAL

Comments: Groundwater Monitoring Well UA6. Marsha Koker (ENSR)

Photo # 2 Roll # 90-17

	Y/N
c. Are the procedures used to make a first determinationof contamination adequate?	
d. Is the assessment plan adequate to detect, characterize, and track contaminant migration?	
e. Will the assessment monitoring wells, given site hydrogeologic conditions, define the extent and concentration of contamination in the horizontal and vertical planes?	
f. Are the assessment monitoring wells adequately designed and constructed?	
g. Are the sampling and analysis procedures adequate to provide true measures of contamination?	
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?	
i. Are the data collected at sufficient frequency and duration to adequately determine the rate of migration?	
j. Is the schedule of implementation adequate?	
k. Is the owner/operator's assessment monitoring plan adequate?	
• If the owner/operator had to implement hisassessment monitoring plan, was it implemented satisfactorily?	
II. Field Evaluation **A. Ground-Water Monitoring System** 1. 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.)	
B. Monitoring Well Construction 1. Identify construction material material diameter a. Primary Casing STAINLESS STEEL b. Secondary or outside casing STEEL	N/A
2. Is the upper portion of the borehole sealed with conrete to prevent infiltration from the surface?	Y
3. Is the well fitted with an above-ground protective device?	Y
4. Is the protective cover fitted with locks to prevent tampering? If a facility utilizes more than a single well design, answer the above questions for each well design?	Y

	Y/N
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
2. Are measurements taken to the 0.01 feet?	Y
3. What device is used? slope indicator.	N/A
4. Is there a reference point established by a licensed surveyor?	Y
5. Is the measuring equipment properly cleaned betweenwll locations to prevent cross contamination?	Y
B. Detection of Immiscible Layers	
1. Are procedures used which will detect light phase immiscible layers?	N
2. Are procedures used which will detect heavy phase immiscible layers?	N
C. Sampling of Immiscible Layers NONE	
1. Are the immiscible layers sampled separately prior to well evacuation?	N/A
2. Do the procedures used minimize mixing with watersoluble phases?	N/A
D. Well Evacuation	
1. Are low yielding wells evacuated to dryness?	Y
2. Are high yielding wells evacuated so that at least three casing volumes are removed?	Y
3. What device is used to evacuate the wells? STAINLESS steel Bailer.	N/A
4. If any problems are encountered (e.g., equipmentmalfunction) are they noted in a field logbook?	Y

	Y/N
12. Is sampling equipment thoroughly dry before use? Dedicated bailers.	N/A
13. Are equipment blanks taken to ensure that sample cross-contamination has not occurred?	Y
14. If volatile samples are taken with a positive gas displacement bladder pump, are pumping rates below 100 ml/min? Dedicated bailers.	N/A
F. In-situ or Field Analyses	
1. Are the following labile (chemically unstable) parameters determined in the field:	
a. pH?	Y
b. Temperature?	Y
c. Specific conductivity?	Y
d. Redox potential?	N
e. Chlorine?	N
f. Dissolved oxygen?	N
g. Turbidity?	N
h. Other (specify) _____	N
2. For in-situ determinations, are they made after well evacuation and sample removal? AFTER WELL EVACUATION.	N
3. If sample is withdrawn from the well, is parameter measured from a split portion?	Y
4. Is monitoring equipment calibrated according to mannufacturers' specifications and consistent with SW-846?	Y
5. Is the date, procedure, and maintenance for equipment calibration documented in the field logbook?	Y
IV. Review of Sample Preservation and Handling Procedures	
A. Sample Containers	
1. Are samples transferred from the sampling device directly to their compatible containers?	Y

	Y/N
2. Are samples for the following analyses field acidified to pH <2 with HNO_3:	
a. Iron?	Y
b. Manganese?	Y
c. Sodium?	Y
d. Total metals?	Y
e. Dissolved metals?	Y
f. Fluoride?	N
g. Endrin?	Y
h. Lindane?	Y
i. Methoxychlor?	Y
j. Toxaphene?	Y
k. 2,4, D?	Y
l. 2,4,5 TP Silvex?	Y
m. Radium?	Y
n. Gross alpha?	Y
o. Gross beta?	Y
3. Are samples for the following analyses field acidfied to pH <2 with H_2SO_4:	
a. Phenols?	Y
b. Oil and grease?	Y
4. Is the sample for TOC analyses field acified to pH <2 with HCl?	Y
5. Is the sample for TOX analysis preserved with 1 ml of 1.1 M sodium sulfite?	Y
6. Is the sample for cyanide analysis preserved with NaOH to pH >12?	Y
C. Special Handling Considerations	
1. Are organic samples handled without filtering?	Y
2. Are samples for volatile organics transfered to the appropriate vials to eliminate headspace over the sample?	Y
3. Are samples for metal analysis split into two portions?	Y
4. Is the sample for dissolved metals filtered through a 0.45 micron filter?	Y
5. Is the second portion not filtered and analyzed for total metals?	Y
6. Is one equipment blank prepared each day of ground-water sampling?	Y

	Y/N
V. Review of Chain-of-Custody Procedures	
A. Sample Labels	
1. Are sample labels used?	Y
2. Do they provide the following information:	
a. Sample identification number?	Y
b. Name of collector?	Y
c. Date and time of collection?	Y
d. Place of collection?	Y
e. Parameter(s) requested and preservitives used?	Y
3. Do they remain legible even if wet?	Y
B. Sample Seals	
1. Are sample seals placed on those containers to ensure samples are not altered?	Y
C. Field Logbook	
1. Is a field logbook maintained?	Y
2. Does it document the following:	
a. Purpose of sampling (e.g., detection or assesment)?	Y
b. Location of well(s)?	Y
c. Total depth of each well?	Y
d. Static water level depth and measurement technique?	Y
e. Presence of immiscible layers and detection method?	Y
f. Collection method for immiscible layers and sample identification numbers?	Y
g. Well evacuation procedures?	Y
h. Sample withdrawal procedure?	Y
i. Date and time of collection?	Y
j. Well sampling sequence?	Y
k. Types of sample containers and sample identification number(s)?	Y
l. Preservative(s) used?	Y
m. Parameters requested?	Y
n. Field analysis data and method(s)?	Y
o. Sample distribution and transporter?	Y
p. Field observations?	Y

	Y/N
—Unusual well recharge rates?	Y
—Equipment malfunction(s)?	Y
—Possible sample contamination?	Y
—Sampling rate?	Y
D. Chain-of-Custody Record	
1. Is a chain-of-custody record included with each sample?	Y
2. Does it document the following:	
a. Sample number?	Y
b. Signiture of collector?	Y
c. Date and time of collection?	Y
d. Sample type?	Y
e. Station location?	Y
f. Number of containers?	Y
g. Parameters requested?	Y
h. Signatures of persons involved in chain-of-custody?	Y
i. Inclusive dates of custody?	Y
E. Sample Analysis Request Sheet	
1. Does a sample analysis request sheet accompany each sample?	Y
2. Does the request sheet document the following:	
a. Name of person receiving the sample?	Y
b. Date of sample receipt?	Y
c. Duplicates?	Y
d. Analysis to be performed?	Y
IV. 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
B. Does the QA/QC program include:	
1. Documentation of any deviation from approved procedures?	Y

	Y/N
2. Documentation of analytical results for:	
a. Blanks?	Y
b. Standards?	Y
c. Duplicates?	Y
d. Spiked samples?	Y
e. Detectable limits for each parameter being analyzed?	Y
C. Are approved statistical methods used?	Y
D. Are QC samples used to correct data?	Y
E. Are all data critically examined to ensure it has been properly calculated and reported?	Y
VII. Surficial Well Inspection and Field Observation	
A. Are the wells adequately maintained?	Y
B. Are the monitoring wells protected and secure?	Y
C. Do the wells have surveyed casing elevations?	Y
D. Are the ground-water samples turbid?	Y
E. Have all physical characteristics of the site been noted in the inspector's field notes (i.e., surface waters, topography, surface features)?	Y
F. Has a site sketch been prepared by the field inspector with scale, north arrow, location(s) of buildings, location(s) of regulated units, locations of monitoring wells, and a rough depiction of the site drainage pattern?	N

APPENDIX I
Oversight Inspection Form

Instructions:

The form is divided into two parts. Part 1 is used during the actual inspection to record observations made in the field. Part 2 of the form is used to evaluate the State inspection report relative to field observations. Both parts of the oversight inspection report have to be completed by the EPA oversight inspector. In the remarks column, N/A may be appropriate in some instances.

PART 1

I. Facility Name: Union Oil Company of California, Chicago Refinery

EPA ID #: ILD 041 550 567

Facility Activities:
- ____ Small Quantity Generator
- ____ Generator
- ____ Transporter
- X Treatment/Storage/Disposal Facility

II. Inspection Type:
- ____ CEI
- ____ O & M
- ____ CME
- ____ Lab Audit
- ____ Records Review
- ____ Compliance Monitoring
- ____ CDI
- X Other (specify) field evaluation portion of 03/07/89 CME (watching sampling inspection)

Items To Be Reviewed:
- ____ Full Scope
- ✓ Limited Scope

Inspection Format:
- ✓ Joint
- ____ Independent

III. EPA Oversight Inspector: Jonathan Cooper

Organization: U.S. EPA

Telephone: (312) 886-4464

IV. Inspection Date(s): 07/18/89

	Yes	No	Remarks
V. Pre-Inspection Review			
1. Did the State inspector arrange the logistics of the inspection by assuring:			
a. facility actively operating?	✓		
b. EPA properly notified?	✓		
2. Did the State transmit requested documents according to the established schedule?			NA.
3. Was the inspector prepared to conduct the inspection? The inspector should have pertinent information (permit application, previous inspection reports, waste types handled) and equipment (safety and sampling)?	✓		
4. Did the inspector present the appropriate identification and advise the owner/operator of the purpose of the inspection and briefly describe the agenda?	✓		
VI. Facility Information (Observations)			
1. Did the inspector demonstrate or obtain knowledge of the facility processes and an understanding of its RCRA history?	✓		
2. Did the inspector conduct a thorough walk-through of the industrial processes and associated hazardous waste generation areas in the facility?		✓	This was a CME
Were there any areas not inspected? If so, why?		✓	Looked at monitoring wells, watched sampling procedures

	Yes	No	Remarks
3. Did the inspector fail to note any violations or improper waste handling activities?		✓	
4. Did the inspector fail to identify any hazardous waste handling areas not previously identified in previous reports or records?			NA. — CME only
5. Upon identifying a potential violation, did the inspector initiate case development procedures (i.e., gather detailed evidence to support the findings of violations)?			NA. None found
6. Did the inspector check the requirements for preparedness and prevention, including adequate aisle space, emergency equipment availability, and access to communications during hazardous waste handling operations?			N.A. CME
7. If applicable, was sampling performed by State personnel in accordance with standard operating procedures specified by the State and/or EPA?			N.A.
8. Was proper safety and sampling equipment used to perform the sampling?	✓		
9. Was the inspector helpful to the owner/operator by providing explanation of the regulations?			N.A.

	Yes	No	Remarks
10. Was the inspector able to answer questions accurately or commit to provide answers at a later date?	✓		
11. If the facility was permitted, did the inspector determine compliance with permit-specific conditions?			N.A.
12. Did the inspector perform an exit interview with the owner/operator summarizing the key findings of the inspection?	✓		

NOTE: The inspector should not make a finding of violation during the inspection, but should only discuss the findings.

VII. Knowledge of the Regulations

	Yes	No	Remarks
1. Was the inspector knowledgeable about hazardous waste regulations applicable to the facility?	✓		
2. Was the inspector aware of recent amendments to the regulations that may affect the conduct of the inspection?	✓		

	Yes	No	Remarks or Not Applicable
VIII. Document Inspection (Review) (Please note if review was performed prior to or during inspection)			
1. Did the inspector thoroughly review the following documents?			
A. For Generators:			
-Inspection records for hazardous waste storage areas			NA
-Personnel training records			
-Contingency plan			
-Emergency equipment testing and maintenance records			
-Waste analysis records			
-Manifests and exception reports			
-State annual and/or EPA biennial reports			
-Waste minimization plan			
B. In addition, for TSDF's:			
-Part A permit application or final issued permit	✓		
-Part B application prior to permit issuance			NA
-Operating record	✓		
-Waste analysis plan	✓		
-Inspection schedule	✓		
-Closure and Post Closure Plan	✓		
-Financial instruments	✓		
-Ground Water Monitoring/Reports	✓		
-Other information (treatment plant operations, internal correspondence)	✓		

PART 2

INSPECTION REPORT REVIEW

	Yes	No	Remarks
I. Review of Inspection Report			
1. Did the inspector submit the completed inspection report within the established SEA or grant deadlines?	✓		
2. Did the inspection report contain factual observations rather than opinion?	✓		
Comments:			
3. Was the report accurate and did it sufficiently document all the violations? Were the regulations interpreted correctly?	✓		
4. Did the report contain a discussion of changes that have occurred at the facility since the previous inspection?	✓		New monitoring wells put in under CAFO; old ones in process of being removed
If not explain items that should have been included:			
5. Did the inspection report accurately reflect the EPA oversight inspector's observations? If not, explain the differences:	✓		There were no observed violations

II. Remarks

1. What is your overall assessment of the inspection and the inspection report?

The report and inspection were complete and adequately done.

2. Describe recommendations that may improve the quality of the State inspection and/or inspection report?

The inspector has sufficient training and has submitted a good report.

NOTE: Indicate whether the inspector is is need of additional training or is lacking in a particular skill (e.g. hazardous waste sampling) needed for an adequate inspection.

3. Comments on the inspection that could have a bearing on the State inspector evaluation (e.g., facility status under litigation, inadequate time allocated to perform inspection, complex industrial processes and waste handling practices, or numerous regulated units located on site).

Newly installed wells (UA series) -- still developing new background; the 1990 inspection will more adequately assess the UA wells and statistical procedures. UA wells were installed around the spring (1989).

RCRA INSPECTION OVERSIGHT

I. Installation: Union Oil Co. of California

EPA ID.#: ILD 041 550 567

Check Either: ✓ Major Installation

____ Non-Major Installation

Installation Activities:

✓ Generator

____ Transporter

✓ Treatment/Storage/Disposal Facility

Authorized State?: ✓ Yes ____ No

II. Inspector: Jeannine Balsamo

Organization: IEPA

Telephone: (312) 345-9780

III. Evaluator: Jon P. Cooper

Organization: U.S. EPA

Telephone: (312) 886-4464

IV. Date of Inspection: 06-22-87 Time: (from) 9:30am (to) 3:15 pm

V. Inspection Evaluation

A) Pre-inspection Preparation	Yes	No	Remarks
1) Did the inspector have a complete set of RCRA regulations with him?	✓		
2) Did the inspector review the Part A application or effective permit before beginning the inspection?	✓		Before site visit

PLEASE FORWARD A COPY OF THE FRONT SHEET ONLY OF THIS EVALUATION FORM WITHIN 5 DAYS FROM THE DATE OF INSPECTION TO Ken Skahn, 5HW, STU #2. (THE ORIGINAL SHOULD GO TO THE STATE COMPLIANCE OFFICER FOR ENTRY INTO HWDMS AND FILING IN THE INSTALLATION COMPLIANCE FILE.)

3) Did the inspector have the appropriate personal safety equipment?		✓	No hard hat – but one was provided by the facility
B) Owner/Operator Interview			
1) Did the inspector present an identity document showing the authority to perform RCRA inspections?	✓		
2) Did the inspector advise the owner/operator of the purpose of the inspection and briefly describe the agenda?	✓		However, this was not done in a clear way while at the facility (perhaps done on the phone prior to the site visit);
3) Was the inspector helpful to the owner/operator by giving explanations and guidance?	✓		
C) Document Inspection			
1) Documents reviewed by the inspector:			
a) Part A application or issued permit	✓		
b) Operator inspection log and schedule			N/A – Inspection was a CME only
c) Personnel training record			" "
d) Operating record			" "
e) Contingency plan			" "
f) Waste analysis plan			" "
g) Closure & Post Closure plan			" "
h) Financial Instruments			" "
i) Manifests			" "
j) Ground Water Monitoring Reports	✓		
k) Other Sampling and Analysis Plan	✓		
G-W Quality Assessment Plan	✓		

	Yes	No	Remarks
2) Were documents reviewed thoroughly?	✓		There were no changes from previous inspection
D) Facility Inspection			
1) Did the inspector observe all required items and correctly record the observations?	✓		
2) Did the inspector ask pertinent questions regarding the processes and wastes management practices used at the facility?		✓	no new practices/processes
3) Did the inspector ask questions about non-regulated activities of the facility?		✓	
4) Did the inspector identify any activities which are regulated but not on the Part A or Permit?		✓	
E) Knowledge of the Regulations			
1) Was the inspector knowledgeable of RCRA regulations applicable to the facility?	✓		
2) Was the inspector aware of recent amendments to the regulations that may affect the conduct of this inspection?			Unknown — no arose
3) Was the inspector able to answer questions accurately?	✓		
4) Did the inspector commit to get answers to questions that couldn't be answered during the inspection?	✓		She was given copies of a CIL and the facility response to it; Question was: Should the facility be in assessment monitoring? (The IEPA says "Yes" and UNOCAL says "No")
F) Completion of Inspection Forms			
1) Did the inspector fully complete the inspection forms during the inspection?		✓	If the facility should be in Assessment, additional portions of the form need to be completed — that decision was not made at the site, but instead was to be evaluated at the office (see E.4. above)

	Yes	No	Remarks
2) Did the inspector make adequate use of written comments to clarify the report?	✓		Other than perhaps having to fill out an Assessment portion, the report itself will be unchanged (except for updated comments in the cover letter) from the last inspection
3) Were the inspector's comments factual observations rather than opinion?	✓		
4) Does the inspector's report accurately reflect your observations at the facility?	✓		As far as completed — the Assessment monitoring decision is still undecided by the inspector

G) Remarks

1) What is your overall assessment of the inspection and the inspection report?

The inspection was well done in the field portion — all wells (RCRA and state shallow wells) were measured for total depth and water elevation in the wells. The office portion of the inspection was straightforward — no changes from the previous year's inspection accept the possible assessment status.

2) What, if anything, would you recommend that the inspector do differently?

ⓐ IEPA's tape for measuring total depth/water elevations is too short; Bring along a longer tape to this site — the water levels and total depths are greater than 100 ft. below the stick up pipe; ⓑ State to the facility staff more clearly the purpose and agenda of the site inspection at the outset and summarize findings at the end more precisely.

3) Additional remarks from other sections:

If the facility comments are accepted at "face value", Unocal is in "Detection" monitoring, not "Assessment" monitoring as IEPA Alleges — what the inspector will decide is unknown.

STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY
INSPECTION REPORT

USEPA Number: ILD041650567 IEPA Number:: 1978030004

Facility Name: Union Oil of California (UNOCAL)

Street: New ave & 135th St
City: Lemont Telephone: 257-7761
County: Will State: IL ZipCode: 60439

Type of Facility: Notified as: G, Tr, D Regulated as: G, D, (Tr)
LDF? Y HPV? N 90 Day Follow-up required? Yes: ___ No: ✓

Region: II Date of Inspection: 10/31/88 From: 10:00 am to: 12:00 pm
Weather (LDF Only): 50° F Sunny

Type of Inspection
ISS: ✓ Sampling: ___ Citizen Complaint: ___ Closed: ___ Other: ___
Record Review: ___ Follow-up to Inspection of: ___ Withdrawal: ___

Non Regulated Status
SQG: ___ Claimed Nonhandler: ___ Other (Specify in Narrative): ___

Notification date, 7/28/80, from (initial) or (subsequent) Notif.

Part A
Initial Part A date: 11/17/80 Ammended: 3/9/87
Part A Withdrawal requested: ___ Approved by (US)(IL)EPA: ___

Part B Permit Application
Part B Permit called by (US)(IL)EPA on: ___ Permit Due: ___
Part B Permit Submitted: 11-6-80 Draft Permit Issued: ___

Enforcement
Has the firm been referred to: USEPA? Y IAG? N County SA? N
Date(s) of initial referral: 8/5/86
USEPA CACO: ___ CAFO: 12/17/86 ALJ Decision: ___
Referral to DOJ by USEPA: ___ Federal Court Order Issued: ___
PCB Order Issued: ___ State Court 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 Insp?	Exempt per 35 IAC, Sec.	On Annual Report 87	86	85
081	Y	Y	Y	N	N	N	N	N	N
No Hazardous Waste Pit in Landfarms since Sept, 1981									

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Operator: Unocal Chicago Refinery Telephone #: 257-7761

Street: 135th & New Ave

City: Lemont State: Il Zip Code: 60439

Owner: Same Telephone #:

Street:

City: State: Zip Code:

Person Interviewed	Title	Telephone #
Lee Erchull	Envir Science Analyst	257-7761

Inspection Participants	Agency/Title	Telephone #
Mary Glynn	IEPA/EPS I	345-9780

Prepared By	Agency/Title	Telephone #

Summary of Apparent Violations

Area	Class	Section
Oth	II	725.116

Area	Class	Section

Area	Class	Section

WASTE DISPOSITION FORM

Facility N[redacted]: Union Oil of California USEPA #: ILD041560567 IEPA #: 1978030004

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	Last Manifested Shipment	Disposition
API separator sludge	API separator after cleaning	5/88	K051	Y	generator only N	Y	Y	N	none	varies	9/26/88 80 yd3 9/28/88 2 yd3	CID Calumet City Disposal
Slop oil + emulsion solids	cleaning of slop oil tanks		K049			Y	N	N			10/3/88 7 yd3 9/30/88 18 yd3	
spent Platinum Catalyst	reforming unit	7/88	D001			N	Y	N			9/7/88 20 drums	Englehardt corp Salt Lake City Utah for recovery
Waste water treatment sludge and storm water dredgings	waste water treatment and storm water retention ponds.	NON	HAZARDOUS							~2500 gal per month	Applied to Landfarms	

* All "No" responses must be explained in the narrative.

10/31/88
UNOCAL
1978030004

NARRATIVE

This facility processes crude oil into gasoline, fuel oils and other petroleum products.

Hazardous Wastes Generated

1. API Separator Sludge (K051)
   From cleaning the API separator.
   Generation rate varies with the frequency of separator cleanings.
   Last shipment was to CID Landfill on 9/28/88.
   None was on site.

2. Slop Oil & Emulsion Solids (K049)
   From cleaning of slop oil tanks.
   Generation rate varies with the frequency of tank cleanings.
   Last shipment was to CID Landfill on 10/3/88.
   None was on site.

3. Spent Platinum Catalyst (D001)
   From Operation of a reformer unit.
   Generation rate varies with reformer operation.
   Last shipment was on 9/7/88 to Englehardt Corporation in Salt Lake City, Utah for recovery.
   None was on site.

Nonhazardous Special Waste Generated

1. Waste water treatment sludge and storm water dredgings.
   From waste water treatment and storm water retention ponds.
   Approximately 4200 dry tons are generated per year.
   This waste is placed in the facility's landfarming areas.

Hazardous Waste Units

D81 There are three landfarming units located on the facility's northeast side. API separator sludge (K051) was applied to these areas from November of 1980 to September of 1981. A closure plan for these areas was approved on August 31, 1988. Per Lee Erchull, the Phase I sampling activities for closure have recently been completed. The facility is expected to complete the closure in approximately 2 or 3 years. Currently, these landfarm areas are used for the application of a non hazardous waste water treatment sludge and storm water dredgings.

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Waste Accumulation Area

A staging area is located on the south end of the plant. No waste was in this area at the time of the inspection.

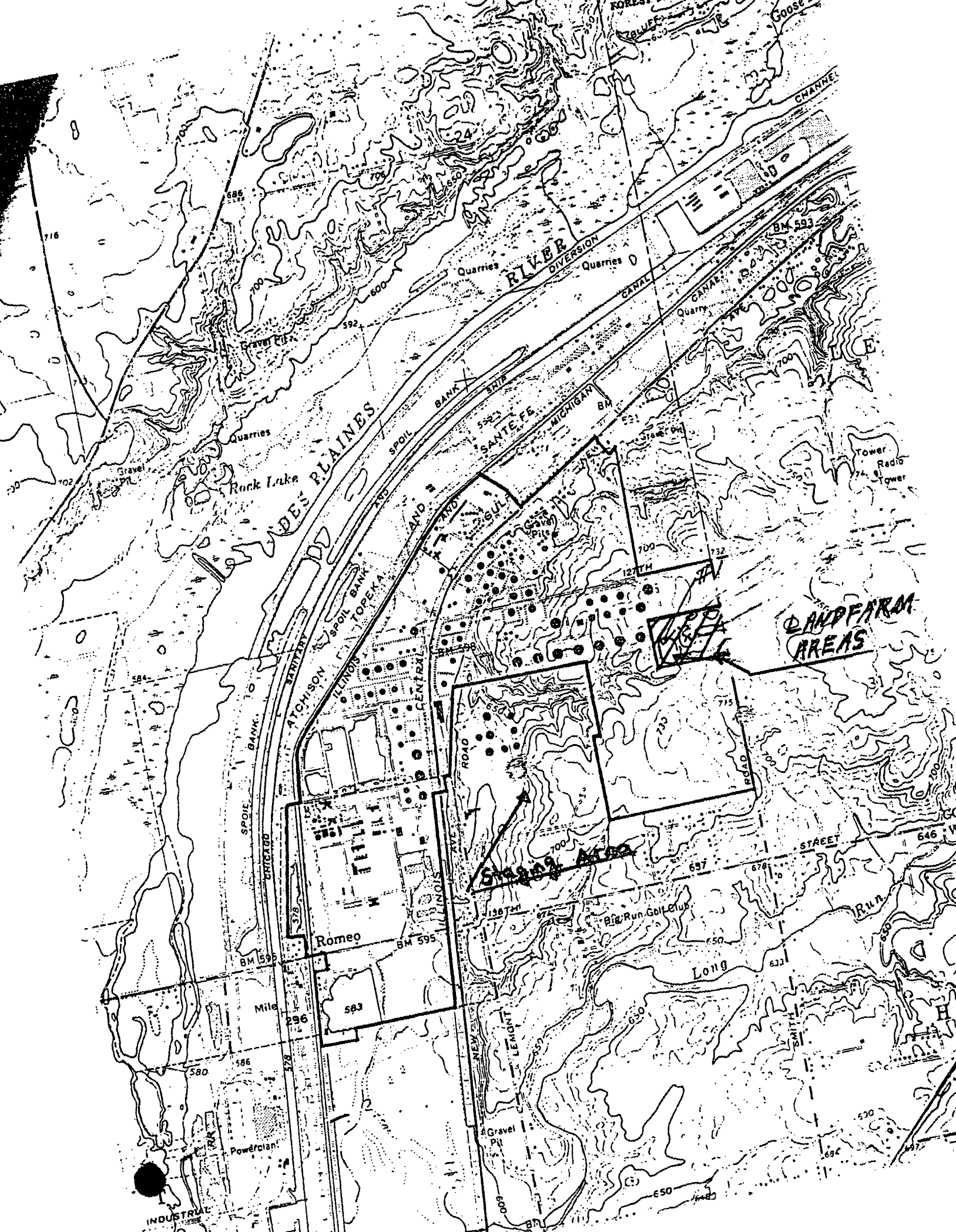
Additional Notes

During the time that AP1 separator sludge was applied to the landfarms (1980-1981.) UNOCAL was a permitted transporter of hazardous waste. (in order to get to the landfarms, trucks had to drive on public highways for approximately 1 1/2 blocks) UNOCAL is currently transporting non hazardous special waste from the process areas to the landfarms.

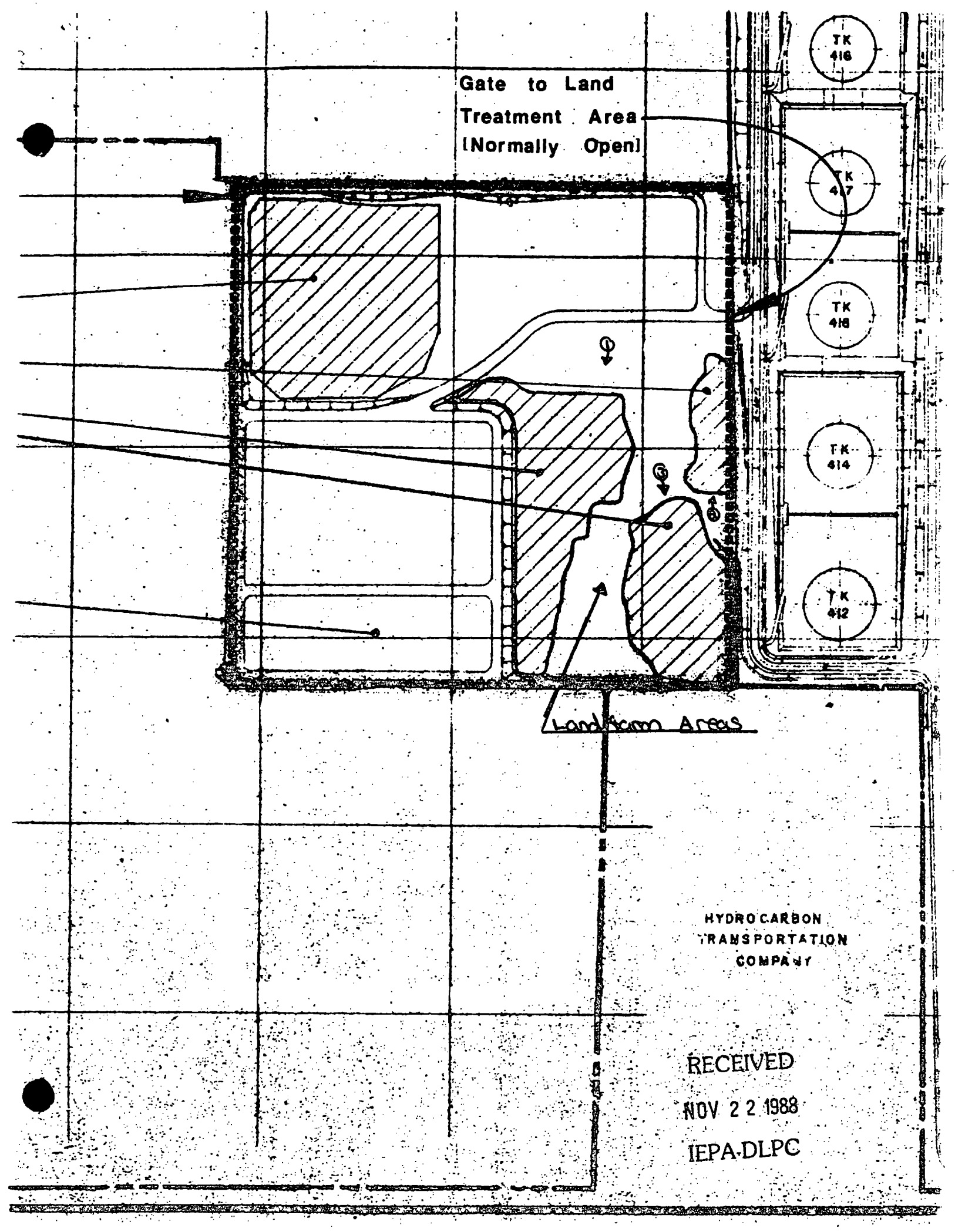
Apparent Violations

725.116 - Although most waste streams are handled by contractors from start to finish. UNOCAL employees will occaisonaly need to label drums or load them on a truck etc... Thus on the job training is conducted from time to time. The facility lacked training documents for this occaisional on the job training.

MG:lb



LANDFARM AREAS
Staging Area
Romeo
Rock Lake
Quarries
Gravel Pit
Big Run Golf Club
Long Run
Powerplant
INDUSTRIAL
Tower
Radio Tower
DES PLAINES
RIVER
SPOIL BANK
SANITARY
CHICAGO
ATCHISON
TOPEKA
SANTE FE
MICHIGAN
ILLINOIS
CENTRAL
NEW
LEMONT
ROAD
STREET
SMITH
CANAL
DIVERSION
CHANNEL
Goose
BM 593
BM 595
Mile
296
583



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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			**PART 703** **RCRA PERMIT PROGRAM** **Subpart C: Authorization by Rule and Interim Status** **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 ✓				Part A initialy filed 11/17/80

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IL 532-1592
PC 258 8/87

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.
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.**				Not a new facility
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.**				No applicable revisions Part A ammended 3/9/87

IL 532-1592
PC 758 8/87

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**	✓			
				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 ✓				No ownership or operational changes

IL 532-1592
PC 256 1/87

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 ___				

IL 532-1592
PC 258 9/07

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 ___ NA ✓				Waste Always delivered to designated facility.

TL 532-1592

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 ___				

IL 532-1502

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 ✓				NO shipments by water.
			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 ____				9/7/88 shipment of Platinum catalyst was a rail shipment.

IL 532-1592

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**			✓	NO waste on site
				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.**				Supplied by the transporter
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.**				This facility accumulates hazardous waste. But they are still regulated because their landfarms are not closed.
			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.**				NO waste has been placed in the landfarm since Sept, 1981

TL 532-1597

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?				NO waste on site
				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 ____				

TI 532-1507

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
				FOR WASTE IN TANKS, has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subpart J: Tank Systems listed below: **NOTE: If the facility has discontinued accumulation of waste in tanks, they are subject to 725.211 and 725.214.** **NOTE: If no waste in tanks, mark N/A and skip to "For waste in containers ...", Subsection a)2) page GEN-C-14.** **Assessment of Existing Tank Systems (Section 725.291)** For tanks not protected by a secondary containment system, is an independent, certified written assessment available? Yes ____ No ____ **NOTE: Except as provided in Subsection (c) of 725.291, certified assessment must be available by 1/12/88.** Does this assessment consider at least the following: 1) available standards for the tank and ancillary equipment; 2) hazardous characteristics of the wastes; 3) existing corrosion protection measures; 4) age of the tank system; and 5) results of a leak test, internal inspection, or other tank integrity examination? Yes ____ No ____				NO Tanks No waste on site

IL 532-1502
IPD 258 8/87

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
			a2	**For waste in containers,** has the generator marked and made visisble for inspection on each container, the date upon which accumulation began? Yes ____ No ____ N/A ✓				No waste on site
			a3	**For waste in containers and tanks,** has the generator marked or labeled each with the words "Hazardous Waste"? Yes ____ No ____ NA ✓				
			a4	Has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subpart C: Preparedness and Prevention listed below: **Maintenance and Operation of Facility (Section 725.131)** 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 ____				725 Subparts C, D & 725.116 are addressed in TSD portion of this checklist

IL 532-1592

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 ____				No satellite accumulation

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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 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 ✓				NO exception reports filed.
			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 ✓				NO unresolved enforcement
			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 ✓				NO requests 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	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**			✓	Exception Reports not required. Manifest copy always received on time
			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?			✓	not required

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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.**			✓	NO exports of waste

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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**			✓	No imports of 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 ____				

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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	2	X		**PART 722** **GENERATOR STANDARDS** **Subpart G: Farmers** **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).**			✓	no farming activities

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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 723 **STANDARDS APPLICABLE TO TRANSPORTERS OF HAZARDOUS WASTE** **Subpart A: General**				UNOCAL Notified as a transporter. Between 1980 & 1981 hazardous waste was transported from process areas (1½ blocks on public hwys) to landfarm areas. No hazardous waste has been transported since 1981. Currently, UNOCAL transports non hazardous special waste from process areas to the landfarm
				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 in 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			**Section 723.111: USEPA Identification Number**	✓			
			a	Has the transporter obtained a USEPA identification number?				
OTH	1	X		**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	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 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 ✓				not exempt
				NOTE: 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 ✓				these wastes are not handled.

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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 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**			X	
			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 ✓				No waste received from foriegn sources
			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 ✓				No transfers of ownership or operation.
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 ____				

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			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 ✓				no process changes
				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 ✓				no waste accepted from off site.
			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 ____				

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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.
				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 ____ NA ✓				NO waste accepted from off-site.

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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.
				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 ✓				No waste accepted from off-site.
				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 ✓				not an exempt facility.

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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.
				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 ___				guards
				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 ___				fences
			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.				

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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	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 ___				

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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.
				- 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.**				NO such units but Land treatment areas are inspected daily.
			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 ____ NA ✓				NO deteriorations or malfunctions
			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 ✓				NO immanent hazards
			d	Does the owner or operator record the results of inspections in a log or summary? Yes ✓ No ____				
			d	Does the inspection record include: - The date and time of the inspection? Yes ✓ No ____ - The name of the inspector? 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.
				- 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 ___				In Most cases, outside contractors are hired to remove waste from process area and transport off site or move to staging area. Thus UNOCAL personnel are not usually involved with direct handling of waste. If a situation arises where UNOCAL staff is needed for waste handling, on the job training is conducted by appropriate department supervisors. UNOCAL employees never handle waste unless it was first containerized by the contractors.
				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 ___				covered on the job

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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.
				B) Key parameters for automatic waste feed cutoff systems? Yes ____ No ____ N/A ✓				No waste feed cut off
				C) Communications or alarm systems? Yes ✓ No ____ N/A ____				covered on the job
				D) Response to fire or explosion? Yes ✓ No ____ N/A ____				↓
				E) Response to ground water contamination incidents? Yes ____ No ____ N/A ✓				no land application since 1985.
				Does the program cover the implementation of the contingency plan? Yes ✓ No ____				covered on the job.
			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 ____				* on the job training received when necessary
			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 ✓				for environmental coordinators but not for those who receive occasional on the job training.

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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.
				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 ___				on the job training not documented
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 ___				

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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	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 ___				

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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.
				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.**	✓			

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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 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 ____				Alarms radios PA system
			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 ____				

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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.
			c	- Portable fire extinguishers, fire control equipment, spill control equipment and decontamination equipment? Yes ✓ No ____ N/A ____				extinguishers absorbents
			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.**				sprinklers
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 ____				daily
				- Fire protection equipment? Yes ✓ No ____ N/A ____				monthly
				- Spill control equipment? Yes ✓ No ____ N/A ____				
				- Decontamination equipment? Yes ✓ No ____ N/A ____ **NOTE: Any "N/A" answer must be explained 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.
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 ✓				never just one employee on site
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:				

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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.
				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 ____				Romeville & Lemont F.D & P.D
				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 ____				Petrochem - contractors
				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 ____				St Joseph Silver Cross
				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 ✓				No refusals

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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 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 ____				Spill portion of the Plan implemented for xylene (Product) spill in 1983.
			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 ____				

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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.
				3) Unplanned sudden or non-sudden releases of hazardous waste or hazardous waste constituents to air, soil, or surface water? Yes ✓ No ___				
			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 ___				

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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.
				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 ___				

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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	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 ___ NA ✓				No applicable revisions
			b	2) The plan fails in an emergency? Yes ✓ No ___ N/A ___				Amended after xylene spill (product) in 1983
			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 ✓				no design or operational changes
			d	4) The list of emergency coordinators changes? Yes ✓ No ___				
			e	5) The list of emergency equipment changes? Yes ___ No ___ NA ✓				no equipment changes
OTH	2			**Section 725.155: Emergency Coordinator**	✓			
				Is there an emergency coordinator on-site or on-call at all times? 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.
				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	1/2			**Section 725.156: Emergency Procedures**			✓	
				Has the facility had a release, fire or explosion? Yes ✓ No ____ **<u>NOTE</u>: 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.**				Xylene Product spill in 1983. Not in a waste area, but spill portion of contingency plan was implemented

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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.
MAN	1			**PART 725** **INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES** **Subpart E: Manifest System, Recordkeeping and Reporting** **Section 725.171: Use of Manifest System**			✓	No waste accepted from off-site
				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 ____				

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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	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 ✓				No waste disposed of on site since 9/81.

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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.
				6) A cross reference by manifest number to location and quantity of hazardous waste? Yes ____ No ____ N/A ✓				not required
				7) Records and results of waste analyses and trial test performed as specified in Sections:				
				- 725.113 (Gen. Waste Analysis)? Yes ✓ No ____				Land Treatment is the only RCRA unit
				- 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 ✓				contingency plan implemented for non-waste incident. 725.156 not Applicable.

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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.
				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 ✓				Not addressed during the inspection
				- 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 ✓				No incineration.
				- 725.477 (Thermal Treatment)? Yes ___ No ___ N/A ✓				No Thermal Treatment.
				NOTE: Data required under 725.194 must be kept throughout the post-closure period.				

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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.
				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**	✓			
			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:				closure not completed
				- The Agency? Yes ____ No ____ NA ✓				
				- 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 ✓				No unresolved enforcement or requests 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	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**			✓	No waste accepted from off-site
				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 ____				

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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.
				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**			✓	no Additional reports required.
				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 ✓				no waste related incidents
			b	2) Groundwater contamination and monitoring data as specified in Sections 725.193 and 725.194? Yes ____ No ____ N/A ✓				not addressed during this inspection
			c	3) Facility closure as specified in Section 725.215? Yes ____ No ____ N/A ✓				closure not completed

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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 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 ✓				closure not complete. ↓
				- 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 ____				

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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.
				- No later than 15 days after termination of interim status (unless a full operating permit was issued simultaneously)? Yes ____ No ____ N/A ✓				NO ISS termination
				- 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 ✓				NO orders or Decrees
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? ✓ Y				
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? ✓ Y				
				NOTE: If no post-closure plan, mark "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 725 **INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES** **Subpart M: Land Treatment**				
OTH	1	X		**Section 725.372: General Operating Requirements**	✓			
			a	Can the waste being placed in or on the land treatment facility be made less hazardous or non-hazardous by degradation, transformation or immobilization processes occurring in or on the soil? Yes ____ No ____ NA ✓				NO waste disposed of since 9/81
			b	Has the owner or operator designed, constructed, and is he now operating and maintaining a run-on control system capable of preventing flow onto the active portions of the unit during peak discharge from at least a 25 year storm? Yes ✓ No ____				drainage ditches
			c	Has the owner or operator designed, constructed, and is he now operating a runoff management system capable of collecting and controlling a water volume at least equal to a 24 hour 25 year storm? Yes ✓ No ____				
			d	Are collection and holding facilities associated with run-on and runoff control systems being emptied or otherwise managed expeditiously after storms so as to maintain design capacity of the system? Yes ✓ No ____				
			e	Is the owner or operator managing the unit to control wind dispersal if the treatment zone contains particulate matter which may be subject to wind dispersal? Yes ____ No ____ N/A ✓				no waste disposed of since 9/81

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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			**Section 725.373: Waste Analysis**			✓	
				Prior to placing hazardous waste in or on a land treatment facility, has the owner or operator:				no waste placed in landfarm since 9/81.
			a	1) Determined the concentration of any substances which exceed the maximum concentrations contained in Table I of Section 721.124 that cause a waste to exhibit the characteristic of EP toxicity? Yes ____ No ____				
			b	2) Determined the concentration of any substances which caused the waste to be listed as a hazardous waste in Part 721, Subpart D? Yes ____ No ____				
			c	3) Determined the concentrations in the waste of arsenic, cadmium, lead and mercury, if food chain crops are grown, unless the owner or operator has written documented data that show that the constituent is not present? Yes ____ No ____				
OTH	1	X		**Section 725.376: Food Chain Crops**			✓	
			a	Has the owner or operator made the required notice under 725.376(a) if food chain crops are being grown, have been grown, or will be grown again on the land treatment facility? Yes ____ No ____				no food chain crops
			b1	Is the owner or operator complying with the requirements of 725.376(b) and (c) concerning the growing of food chain crops on land treatment facilities? Yes ____ No ____				

TL 532-1507

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 725.378: Unsaturated Zone (Zone of Aeration) Monitoring**	✓			
			d	Does the owner or operator have a written unsaturated zone monitoring plan and is it maintained at the facility? Yes ✓ No ____				
				Has the owner or operator implemented his unsaturated zone monitoring plan? Yes ✓ No ____				
OTH	2			**Section 725.379: Recordkeeping**	✓			
				Is the owner or operator including the date and rate of application of hazardous waste in the operating record? Yes ✓ No ____				
CLO	1			**Section 725.380: Closure and Post-Closure**			✓	Closure not completed
				NOTE: Determine compliance or non-compliance with this Section only in conjunction with a closure verificiation inspection conducted after the facility and its independent registered professional engineer (or independent qualified soil scientist) have certified closure in accordance with an approved closure and post-closure plan.				
				Has the land treatment facility been closed in accordance with an approved closure plan? 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.
OTH	1			**Section 725.381: Special Requirements for Ignitable or Reactive Wastes**			✓	No land treatment of these wastes
			a	Have ignitable or reactive wastes been land treated by immediately incorporating them into the soil 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 ____				
			b	Is the waste managed in such a way that it is protected from any material or conditions which may cause it to ignite or react? Yes ____ No ____ N/A ____				
OTH	1			**Section 725.382: Special Requirements for Incompatible Wastes**			✓	
				Is the owner or operator complying with the requirements concerning the land treatment of incompatible wastes or incompatible wastes and materials contained in this Section? Yes ____ No ____				

IL 532-1592

Date: 10/31/88

Time: 11:00 am

m G

Photograph by:

M. Glynn

City: Lemont

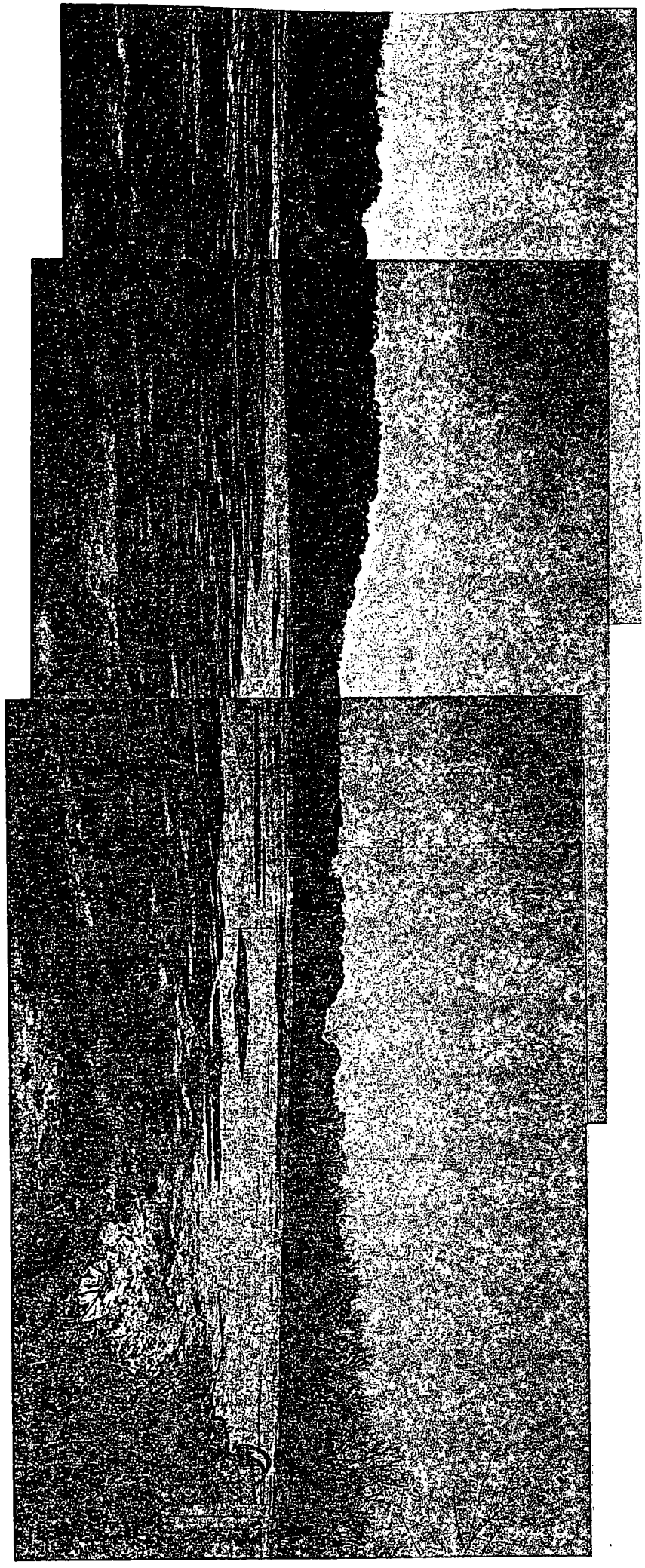
IEPA #: 1978030004

Site Name:

UNOCAL

Comments: From North West Landfarm Area

Photo #: 1 Roll #: 89-117



Date: 10/31/88

Time: 11:00 am

Photograph by:

M. Glynn

City: Lemont

IEPA #: 1978030004

Site Name:

UNOCAL

Comments:

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Photo #: ____ Roll #: 89-117

Date: 10/31/88

Time: 11:00 am

Photograph by:

M. Glynn

City: Lemont

IEPA #: 1978030004

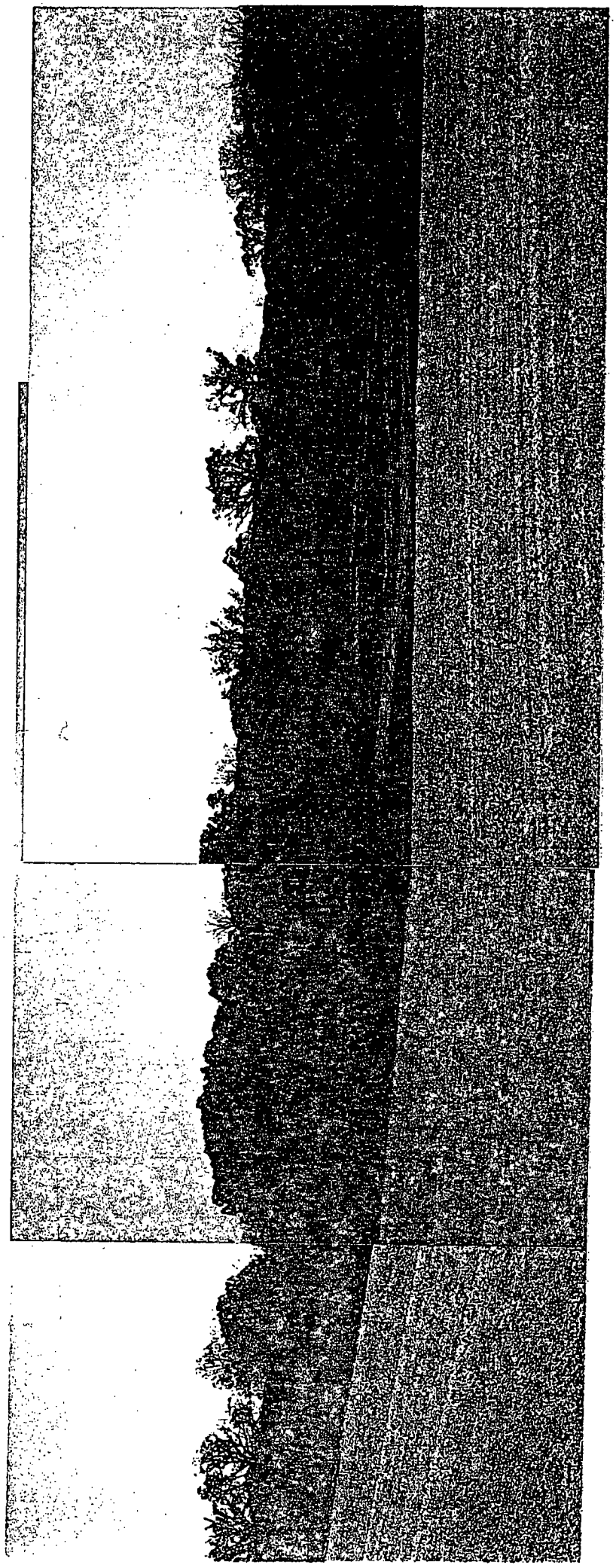
Site Name:

UNOCAL

Comments: From south North Landfarm Area

Photo #: 2 Roll #: 89-117

mL



Date: 10/31/88

Time: 11:00 am

Photograph by:

M. Glynn

City: Lemont

IEPA #: 1978030004

Site Name:

UNOCAL

Comments:

Photo #: ____ Roll #: 89-117

mg

Date: 10/31/88

Time: 11:00 am

Photograph by:

M. Glynn

City: Lemont

IEPA #: 1978030004

Site Name:

UNOCAL

Comments: From North South Landfarm Area

Photo #: 3 Roll #: 89-117

Date: 10/31/88

Time: 11:00 am

Photograph by:

M. Glynn

City: Lemont

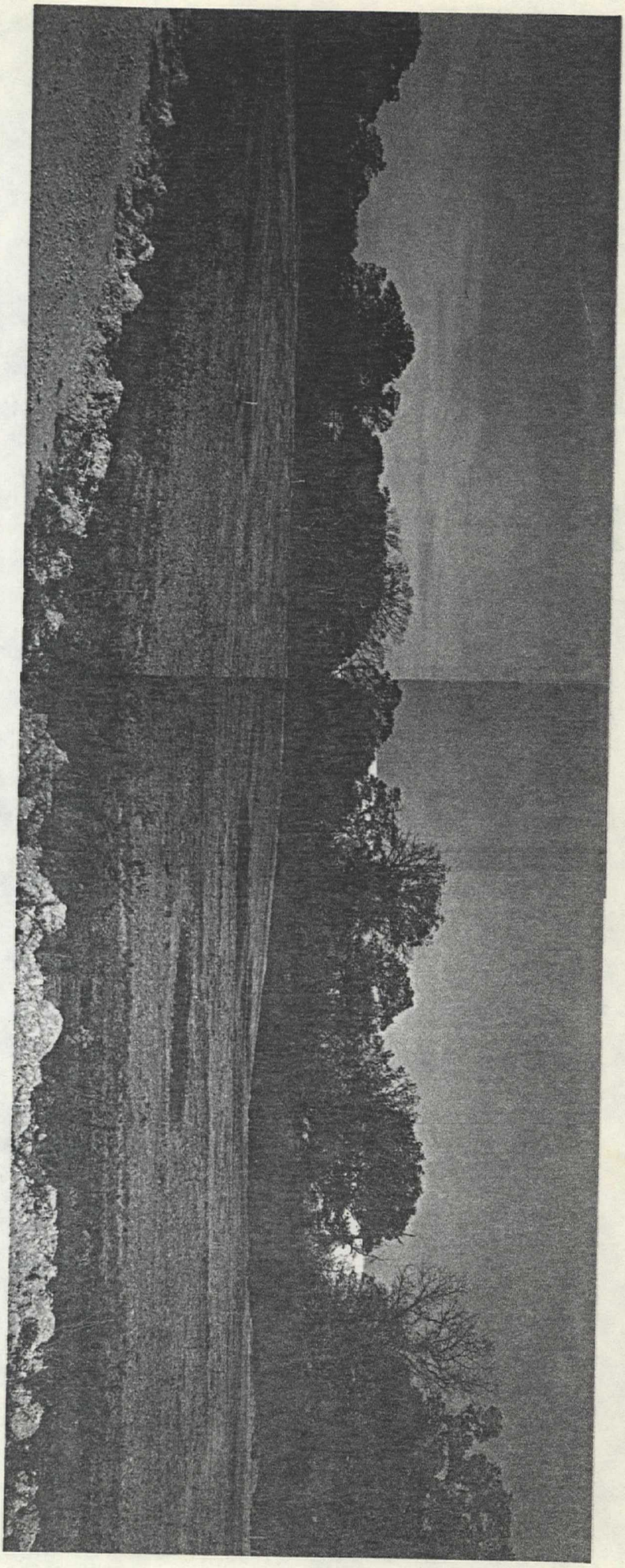
IEPA #: 1978030004

Site Name:

UNOCAL

Comments:

Photo #: ____ Roll #: 89-117



APPENDIX A-1

FACILITY INSPECTION FORM FOR COMPLIANCE WITH INTERIM STATUS STANDARDS COVERING GROUNDWATER MONITORING

General Information

USEPA Number: ILD041550567 IEPA Number: 1978030004

Major Facility: YES/NO Notified As: GEN./TSD Regulated As: GEN./TSD

Facility Name: [redacted]

Street: 135 NEW AVENUE

City: LEMONT State: ILLINOIS Zip Code: 60439

Phone: 312/257-7761 County: WILL

Facility Contact Official: LEO ERCHULL Branch/Organization:

Title: ENVIRONMENTAL SCIENCE ANALYST

Region: 2 Date of Inspection: 9/13/88 Time: (From) 1:00pm (To) 3:00pm

Type of Inspection: GWM RR F/U ___/___/___ (Date of Initial Inspection)

Preparer Information:

Name: Gina Brun

Agency/Title: IEPA/ERS II

Telephone: 312-345-9780

Section	Class I	Class II
TOTAL Class I's & II's		

	YES	NO	UNKNOWN	WAVIED
Type of facility: (check appropriately)				
a) surface impoundment		✓		
b) landfill		✓		
c) land treatment facility	✓			
d) disposal waste pile*		✓		
Groundwater Monitoring Program				
1. Was the groundwater monitoring program reviewed prior to site visit? If "NO",				
a) Was the groundwater program reviewed at the facility prior to site inspection?				
2. Has a groundwater monitoring program (capable of determining the facility's impact on the quality of groundwater in the uppermost aquifer underlying the facility) been implemented? 725.190(a)				

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*Listed separate from landfill for convenience of identification.

IL 532-1344
LPC 195 4/85

NARRATIVE

On September 13, 1988 I met with John Cooper - USEPA, Leo Erchull, D.W. Bruckert, of Unocal, and Maurice Veatch of ERT, Inc. Maurice Veatch is the Hydrogeologist representing Unocal. The meeting was held at the Unocal Facility in Lemont. This meeting was scheduled to discuss the proposed RCRA Monitoring System.

Proposed monitoring well NMW-B3 will be moved approximately 400 feet west of the original proposed location. NMW-B3 will be located approximately 10 feet from the waste management area. Proposed monitoring well NMW-B1 will be located approximately 15 feet from the waste management area. Proposed monitoring well NMW-B5 will be moved closer (approximately 20 feet) to the waste management area. Proposed monitoring well NMW-B9 will be located approximately 15 feet from the waste management area. During the meeting Unocal indicated that a additional well will be included in the Proposed Groundwater Monitoring System. The additional well is NMW-B-6 which will be located approximately 20 feet from the waste management area. The proposed upgradient well (NMW-1) will be located adjacent to existing upgradient monitoring well MW-1.

During the meeting their was some discussion on the length of tail pipe, which Unocal is proposing new monitoring well construction. Unocal wants a 18 inch tail pipe and the Agency favor a 12 inch tail pipe (see Attachment B).

Gino Bruni

GB:bj:058J

cc: Maywood Region
Cindy Davis

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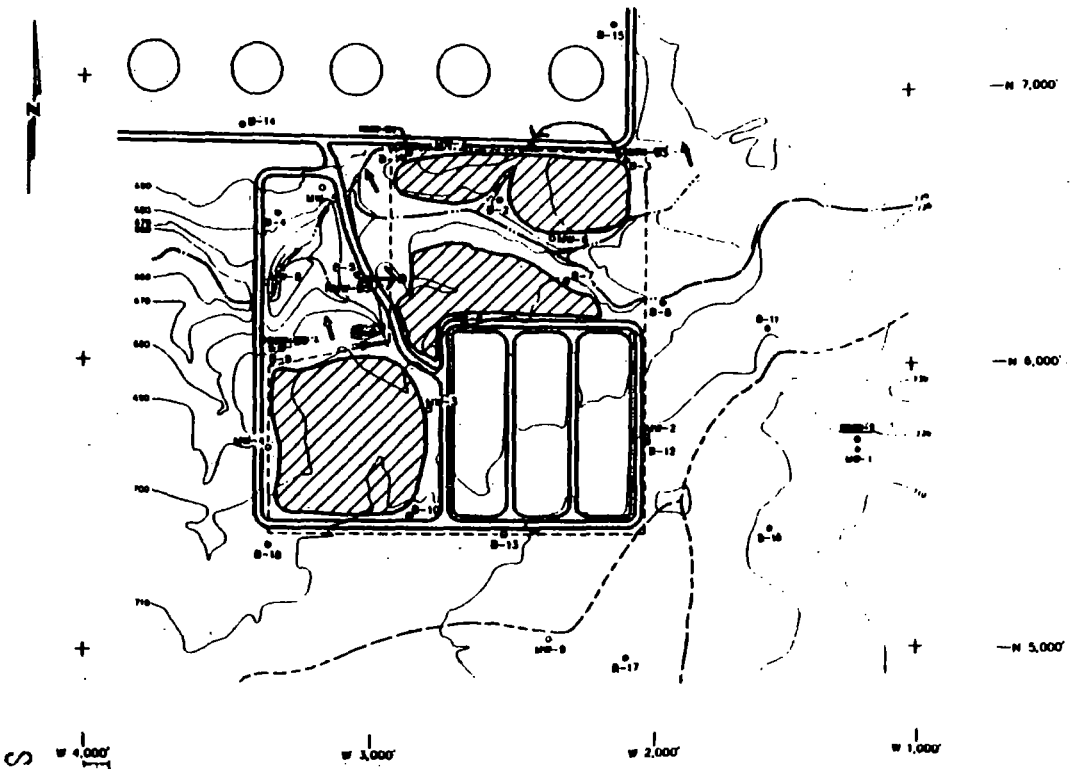

LEGEND

STORAGE TANKS

LAND TREATMENT AREAS

TOPOGRAPHIC CONTOUR
MEAN SEA LEVEL DATUM
CONTOUR INTERVAL = 10 FEET

INTERMITTENT DRAINAGE WAY

TOPOGRAPHIC DRAINAGE DIVIDE

DIRECTION OF GROUNDWATER MOVEMENT

MW-1
EXISTING MONITOR WELL
TO BE SEALED AND ABANDONED

B-1
EXISTING BEDROCK PIEZOMETER

MW-10
PROPOSED MONITOR WELL

+ N 5,000'

W 1,000'

PLANT COORDINATES

NOTE

THE EXISTING UPPERMOST AQUIFER GROUNDWATER MONITORING SYSTEM (GMS) CONSISTS OF MONITOR WELLS MW-1 THROUGH MW-9. UNOCAL'S PROPOSED NEW GMS WOULD CONSIST OF FIVE (5) NEW GROUNDWATER QUALITY MONITOR WELLS IN THE UPPER PART OF THE UPPERMOST AQUIFER (LEMONT DRIFT) AND EIGHTEEN (18) EXISTING PIEZOMETERS (WATER-LEVEL MEASUREMENT PIEZOMETERS) IN THE LOWER PART OF THE UPPERMOST AQUIFER (SILURIAN BEDROCK)

SCALE IN FEET
1 INCH = 200 FEET

UNOCAL CHICAGO REFINERY
LAND TREATMENT FACILITY
PROPOSED GROUNDWATER MONITORING SYSTEM

FIGURE 2-1

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ATTACHMENT B

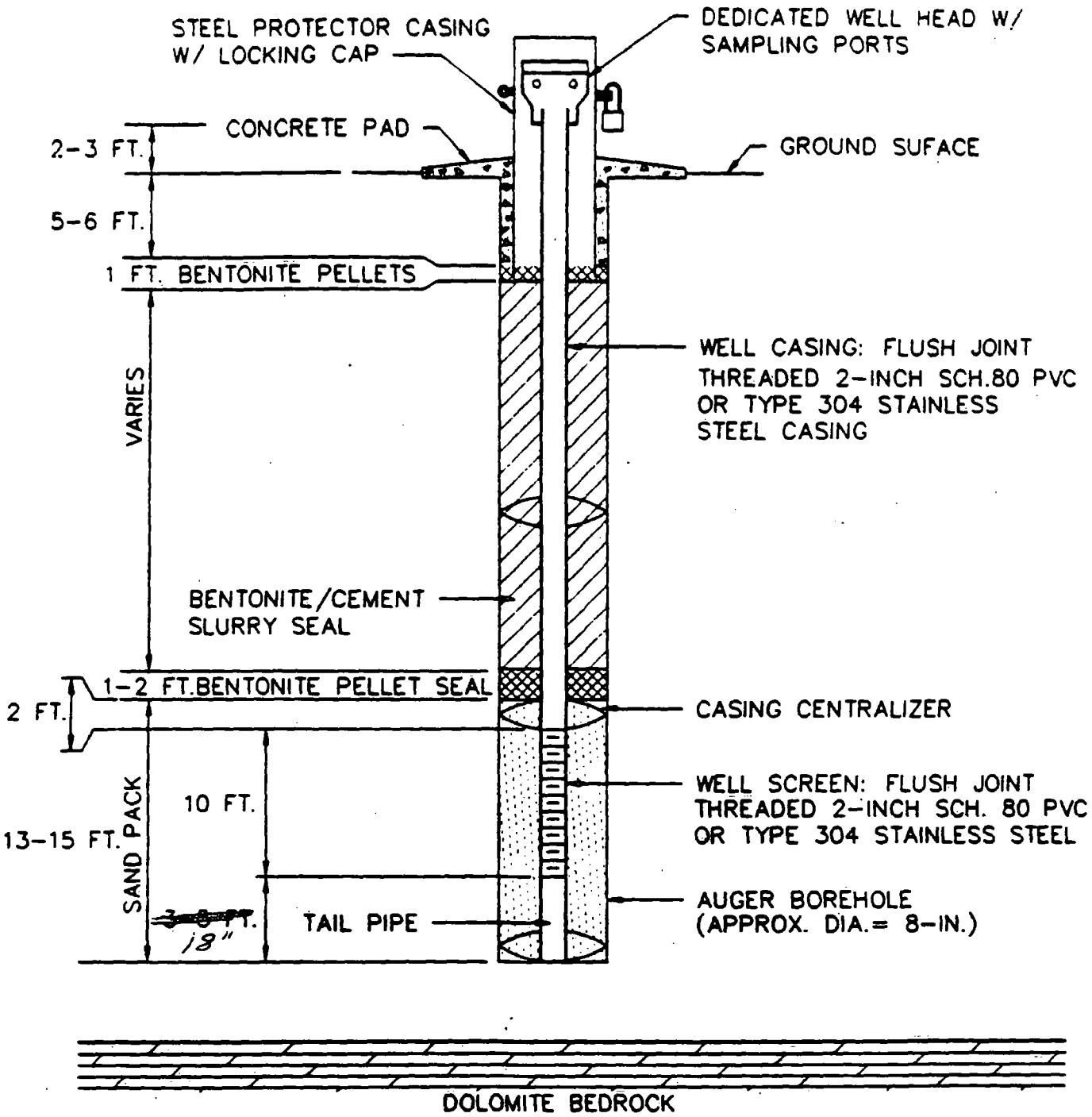

FIGURE 3-1

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ERT
AN ENSR COMPANY

MONITOR WELL DESIGN
LAND TREATMENT FACILITY
UNOCAL CHICAGO REFINERY

DRAWN BY:	DATE:	PROJECT NO.
N.L. JONES	6-14-88	6940-012

6940009A

APPENDIX A-1

FACILITY INSPECTION FORM FOR COMPLIANCE WITH INTERIM STATUS STANDARDS COVERING GROUNDWATER MONITORING

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General Information

USEPA Number: ILD041550562 IEPA Number: 1828030004

Major Facility: YES/NO Notified As: GEN./TSD Regulated As: GEN./TSD

OFFICE OF RCRA Waste Management Division U.S. EPA, REGION V

Facility Name: UNOCAL Corp.

Street: 135 - NEW AVENUE

City: LEMONT State: ILLINOIS Zip Code: 60439

Phone: 312/257-7761 County: Will

Facility Contact Official: Leo ERCHULL Branch/Organization:

Title: ENVIRONMENTAL SCIENCE ANALYST New Date of discovery Aug. 19 1988 T.K. 10-7-88

Region: 2 Date of Inspection: 06/21/88 Time: (From) 9:00 AM (To) 12:00 pm

Type of Inspection: (GWM) RR F/U ___/___/___ (Date of Initial Inspection)

NO NEW VIOLATIONS.

Section	Class I	Class II
* 725.190	✓	
* 725.191	✓	
* 725.193	✓	
* APPARENT VIOLATIONS FOUND IN PREVIOUS INSPECTIONS WERE AGAIN OBSERVED		
TOTAL Class I's & II's	3	

Preparer Information:

Name: GINO BRUNI

Agency/Title: IEPA/EPS II

Telephone: 312/345-9780

Type of facility: (check appropriately)	YES	NO	UNKNOWN	WAVIED
a) surface impoundment		✓		
b) landfill		✓		
c) land treatment facility (Landfarming)	✓			
d) disposal waste pile*		✓		

Groundwater Monitoring Program

	YES	NO	UNKNOWN	WAVIED
1. Was the groundwater monitoring program reviewed prior to site visit? if "NO",	✓			
a) Was the groundwater program reviewed at the facility prior to site inspection?	✓			
2. Has a groundwater monitoring program (capable of determining the facility's impact on the quality of groundwater in the uppermost aquifer underlying the facility) been implemented? 725.190(a)		✓		

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*Listed separate from landfill for convenience of identification.

IL 532-1344
LPC 195 4/85

NARRATIVE

An inspection was conducted on June 21, 1988 at UNOCAL to determine their compliance with Subpart F Groundwater Monitoring Requirements. Present at the inspection were Leo Erchull, Environmental Science Analyst for UNOCAL, and myself.

The facility maintains a land farming operation that consists of one sludge drying bed, and three land spreading areas (D81). API Separator Sludge (K051) had been land farmed in these areas six months following the effective date of RCRA. The facility is presently trying to close the land farm areas. UNOCAL filed a closure plan in June 1988. Currently UNOCAL sends all hazardous wastes off site for disposal. No hazardous waste is being land farmed. UNOCAL is presently land farming nonhazardous waste.

The site presently monitors the land farming unit for RCRA compliance utilizing nine deep wells. Six shallow wells monitor the site under their state permit.

Enforcement History

- Referred to the USEPA due to violations of RCRA.
- On December 17, 1986 a CACO was issued to UNOCAL.
- On October 23, 1987 the CAFO was negotiated and executed.
- On November 20, 1987 UNOCAL paid the penalty ($7,600).

Compliance With Subpart F From March 1987 to the Present

- March 27, 1987 CIL:

  1) 725.193(c) - Failure to do an immediate resample for those downgradient wells where significant differences were detected.

  2) 725.193(d)(1) - Failure to provide written notice to the Director within 7 days that the facility may be affecting groundwater.

  3) 725.193(d)(2) - Failure to submit a Groundwater Assessment Plan within 15 days after notice to the Director.

  4) 725.194(a)(2) - Failure to do the evaluation under 725.193(f) to determine whether the requirement under 725.191(a) for locating the monitoring wells continues to be satisfied.

- April 24, 1987: RTC letter - resolving 725.194(a)(2)(c):

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- August 6, 1987: A letter from the Agency indicating that Jeannine Balsamo inspected UNOCAL on June 22, 1987. At the time of the inspection, apparent violations found in previous inspections were again observed. During the June 22, 1987 inspection UNOCAL remained in violation of Sections:

  725.190(a)
  725.190(b)
  725.191(a)(1)
  725.191(c)
  725.193(c)
  725.193(d)(1)
  725.193(d)(2)

  The above violations were cited in previous inspections.

During this inspection UNOCAL remains in apparent violation of the following sections:

1. 725.190(a) - Facility is not implementing a Groundwater Monitoring Program capable of determining the facility's impact on the quality of groundwater in the uppermost aquifer.

   a. All the wells have 20 foot screens, except MW4, which has a 30 foot screen. Longer screens can result in excessive dilution of a contaminant.

   b. The uppermost aquifer beneath the site consists of two stratigraphic units which are hydraulically well connected. (1) lower part of the Lemont Drift; and (2) silurian dolomite bedrock. MW2, MW3, MW5, and MW6 are drilled into the dolomite. The facility must install new wells which monitor both the Lemont Drift and the silurian dolomite aquifer.

2. 725.190(b) - Failure to operate and maintain a Groundwater Monitoring System which meets the requirements of Section 725.191 through 725.194.

3. 725.191(a)(1) - Failure to install an upgradient monitoring well sufficient to yield a representative groundwater sample.

   a. MW2 (upgradient well) is screened only 2 ft. into the bedrock. The owner/operator should use shorter well screens in order to obtain depth discrete water quality data. (MW2 has a 20 foot screen). The owner operator must install new upgradient monitoring wells which would monitor both the Lemont Drift and the silurian dolomite aquifer.

4. 725.191(a)(2) - Failure to install downgradient wells sufficiently to immediately detect any statistically significant amounts of hazardous waste or hazardous waste constituents that migrate from the waste management area to the uppermost aquifer.

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a. All wells have 20 foot screens except MW4 which has a 30 foot screen. Longer screens can result in excessive dilution of a contaminant.

b. The monitoring wells do not monitor the Lemont Drift and the silurian dolomite, which are hydraulically well connected.

5. 725.191(c) - The annular space, above the sampling depth must be sealed with suitable material, cement grout or bentanite slurry.

a. The large screened intervals (20ft.), the excessive sand packs (40 ft.) and the use of natural clay as a backfill material combined, make the current monitoring wells unacceptable.

6. 725.193(c) - Failure to provide written notice to the Director within 7 days that the facility may be affecting groundwater.

7. 725.193(d)(2) - Failure to submit a Groundwater Assessment Plan within 15 days after notification to the director.

Violations of 725.193(c), 725.193(d)(1), and 725.193(d)(2) above, were cited from statistical data submitted by the facility and confirmed by the Agency. Statistical data from the following wells showed significant increases and decreases for the following parameters:

June 1986 Sampling:	MW-1	Decreased pH
	MW-3	" "
	MW-4	" "
	MW-6	" "
December 1986 Sampling:	MW-8	Decreased pH
	MW-9	" "
	MW-3	Increased to C
	MW-8	" "
	MW-2	Increased SC
	MW-3	" "
	MW-9	" "

Compliance with CAFO

Pg. 3 A.- UNOCAL has submitted a revised plan and schedule for supplemental hydrogeologic investigations. The work plan is dated September 1987.

Pg. 4 B.- UNOCAL has submitted a plan and schedule for the establishment of a system of Groundwater Monitoring wells.

Compliance with all other sections of the CAFO are pending approval of the Groundwater Monitoring System, Plan and Schedule.

GB:bj:014J

cc: Maywood Region

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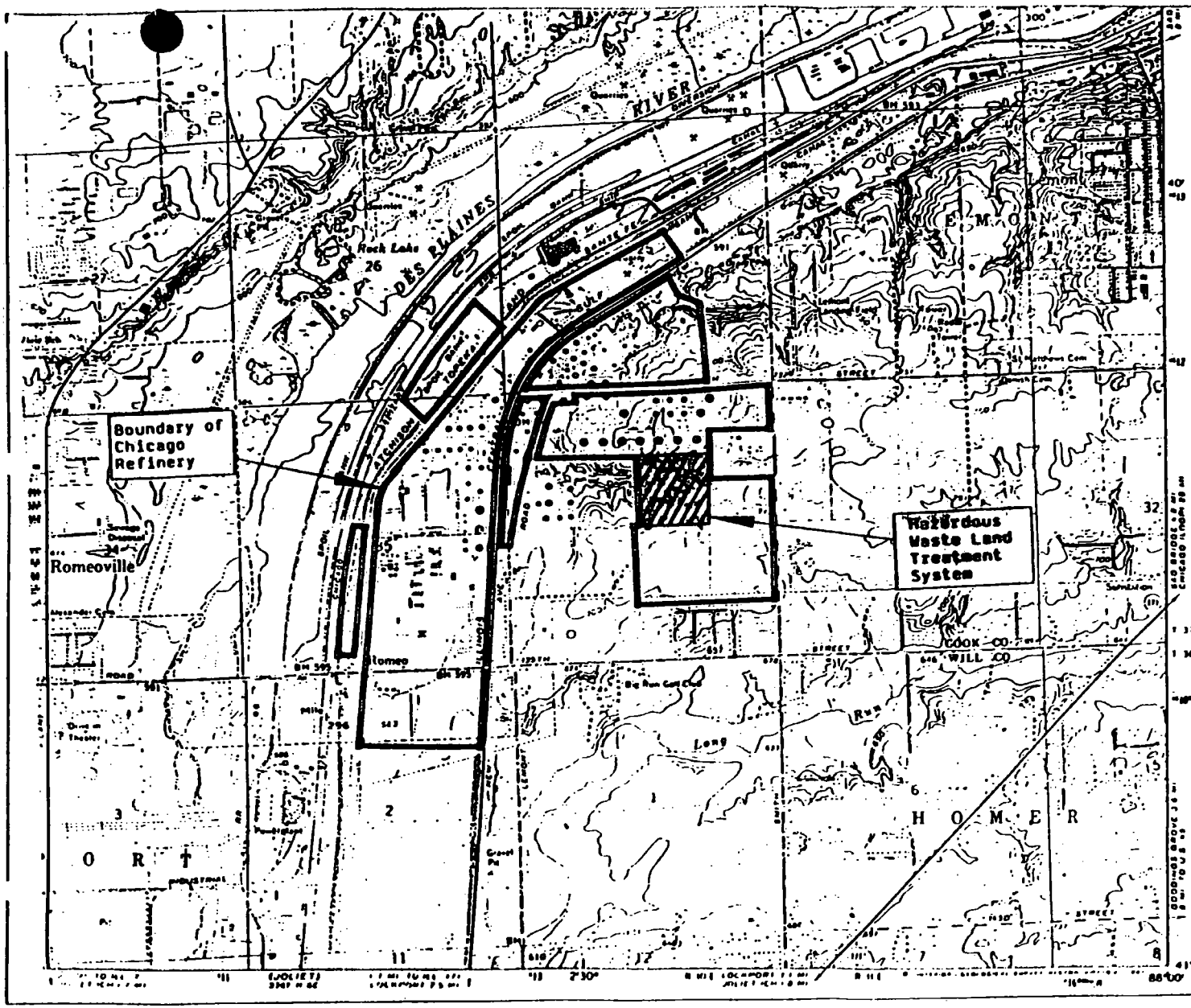

SCALE 1:24000

CONTOUR INTERVAL 10 FEET
DOTTED LINES REPRESENT 5-FOOT CONTOURS
NATIONAL GEODETIC VERTICAL DATUM OF 1929

ROMEOVILLE QUADRANGLE
ILLINOIS
7.5 MINUTE SERIES (TOPOGRAPHIC)

1962
PHOTOREVISED 1973 AND 1980
DMA 3307 II NE-SERIES V883

UTM GRID AND 1980 MAGNETIC NORTH DECLINATION AT CENTER OF SHEET

FACILITY LOCATION MAP	FIGURE A-1
ERM-North Central Inc.	

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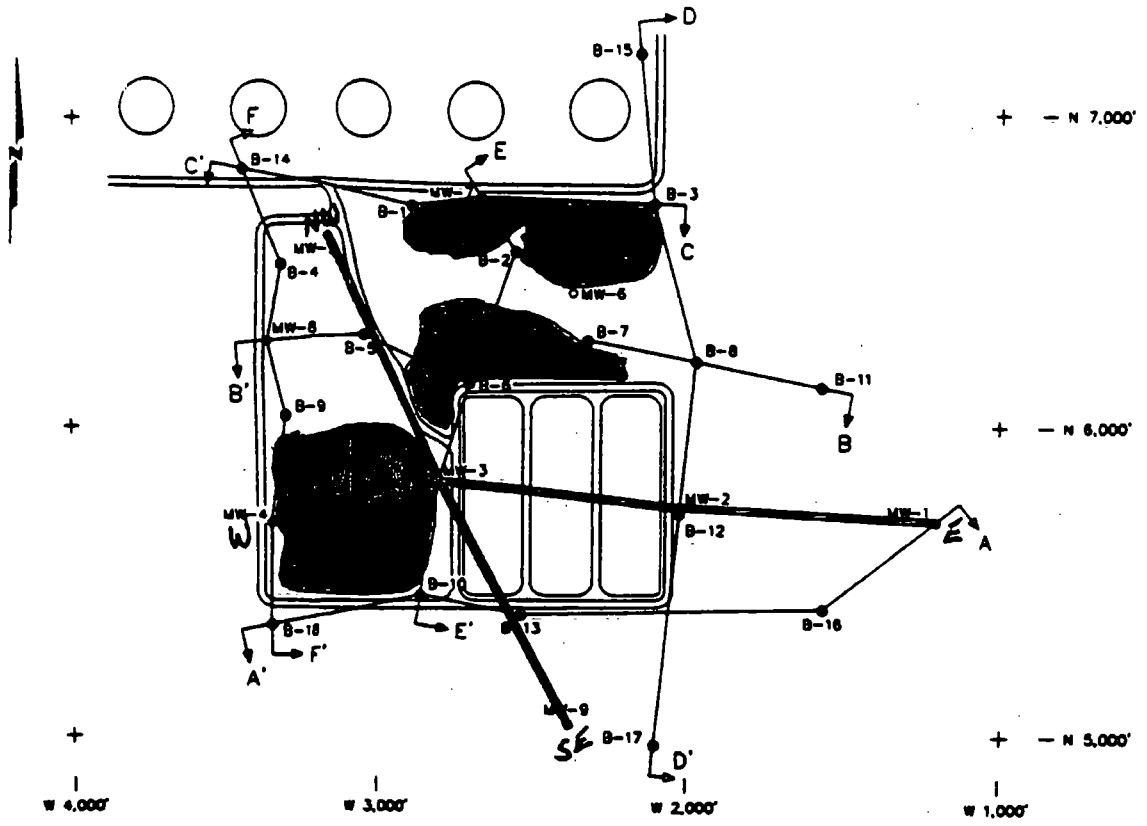
UNOCAL 6-21-88

INDEX MAP



200 0 200 400
SCALE IN FEET
1 INCH = 400 FEET

LEGEND

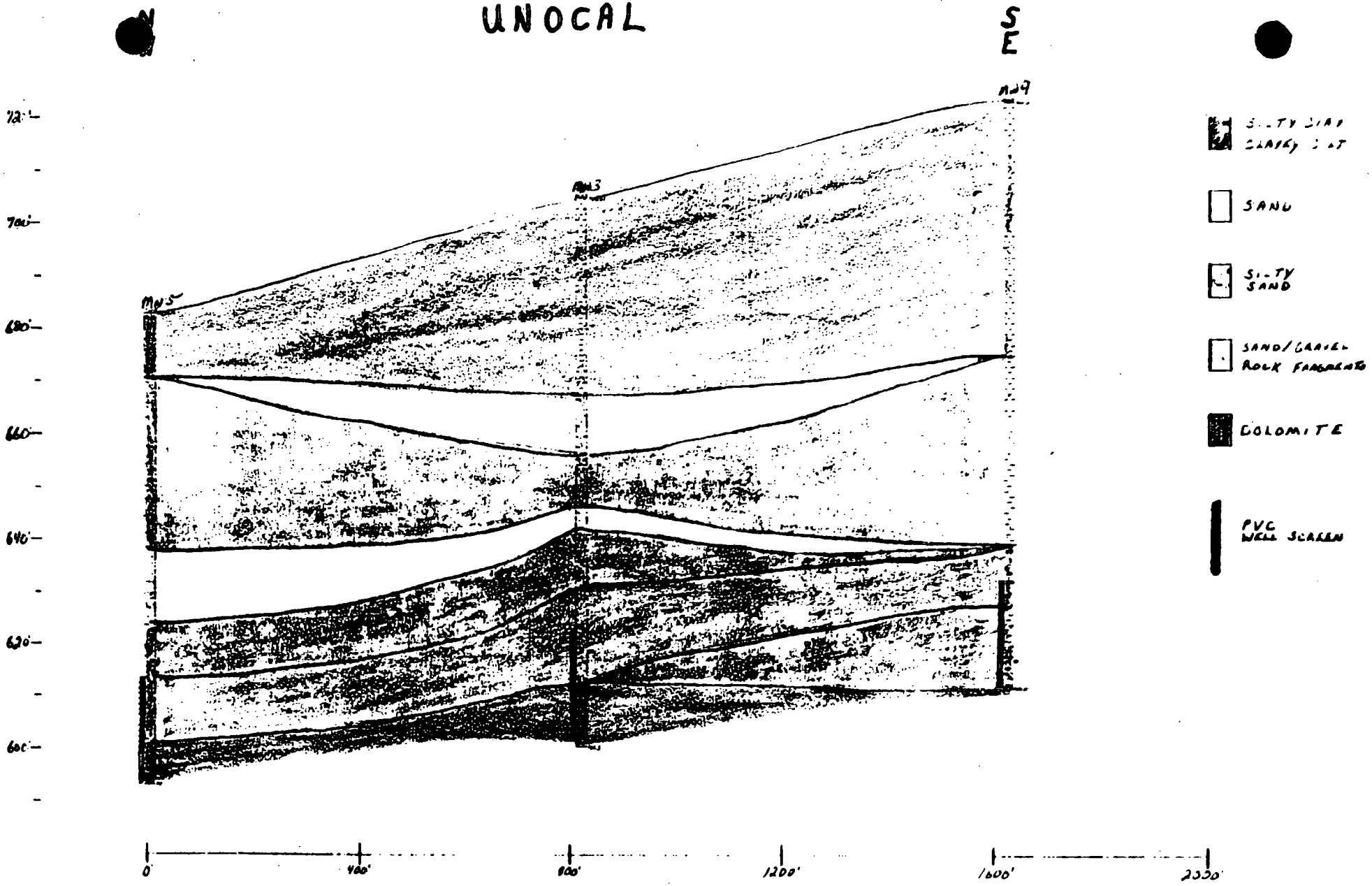
LINE OF CROSS SECTION

MW-1
MONITOR WELL

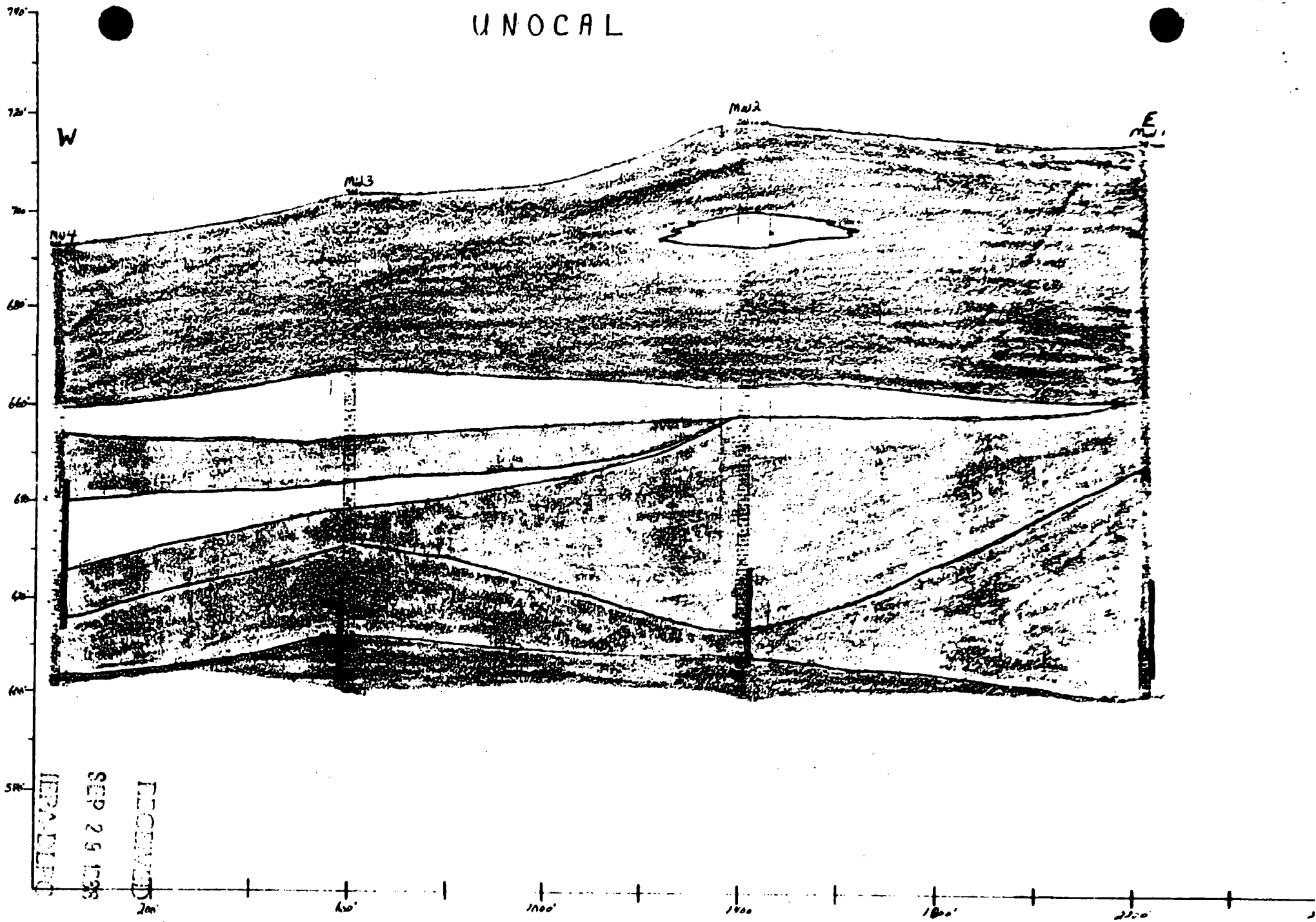
B-1
BEDROCK PIEZOMETER

LAND Application AREA

UNOCAL


N
S
E
MW5
MW3
MW9
720'
700'
680'
660'
640'
620'
600'
0
400'
800'
1200'
1600'
2330'
SILTY CLAY
CLAYEY SILT
SAND
SILTY SAND
SAND/GRAVEL
ROCK FRAGMENTS
DOLOMITE
PVC
WELL SCREEN

UNOCAL



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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
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) Y
h. Ground-water Assessment Program Outline (or Plan, if the facility is in assessment monitoring)? (Y/N) Y
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) Y
d. Slug tests? (Y/N) N

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e. Pump tests? (Y/N) Y
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) N
f. Aerial photography? (Y/N) N
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) Y
f. Narrative description and calculation of ground-water flows? (Y/N) Y
g. Water table/potentiometric map? (Y/N) Y
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) Y

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

   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) Y

   If yes, does the site map show:

   a. Regulated units of the facility (e.g., landfill areas, impoundments)? (Y/N) Y
   b. Any seeps, springs, streams, ponds, or wetlands? (Y/N) Y
   c. Location of monitoring wells, soil borings, or test pits? (Y/N) Y
   d. How many regulated units does the facility have? 3 Land Application units
      If more than one regulated unit then,
      o Does the waste management area encompass all regulated units? (Y/N) Y
        Or
      o Is a waste management area delineated for each regulated unit? (Y/N) 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) ✓
      o Mud rotary ✓
      o Reverse rotary ___
      o Cable tool ___
      o Jetting ___
      o Other (specify) ___
   e. Were continuous sample corings taken? (Y/N) Y
      minimum of 10' into bedrock

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

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

h. Does the field boring log include the following information:
- o Hole name/number? (Y/N) Y
- o Date started and finished? (Y/N) Y
- o Driller's name? (Y/N) Y
- o Hole location (i.e., map and elevation)? (Y/N) Y
- o Drill rig type and bit/auger size? (Y/N) Y
- o Gross petrography (e.g., rock type) of each geologic unit? (Y/N) Y
- o Gross mineralogy of each geologic unit? (Y/N) 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
- o Development of soil zones and vertical extent and description of soil type? (Y/N) Y
- o Depth of water bearing unit(s) and vertical extent of each? (Y/N) Y
- o Depth and reason for termination of borehole? (Y/N) Y
- o Depth and location of any contaminant encountered in borehole? (Y/N) Y
- o Sample location/number? (Y/N) Y
- o Percent sample recovery? (Y/N) Y
- o Narrative descriptions of:
  - -- Geologic observations? (Y/N) Y
  - -- Drilling observations? (Y/N) Y

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

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

o Falling head tests? (Y/N) Y
o Static head tests? (Y/N) Y
o Settling measurements? (Y/N) N
o Centrifuge tests? (Y/N) N
o Colum 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/A
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) Y
5. Did the geologic assessment address or provide means for resolution of any information gaps of geologic data? (Y/N) Y
6. Do the laboratory data corroborate the field data for petrography? (Y/N) Y
7. Do the laboratory data corroborate the field data for mineralogy and subsurface geochemistry? (Y/N) Y

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) Y
   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) Y
      o backfill procedure? Y

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3. Did the owner/operator provide a topographic map which was constructed by a licensed surveyor? (Y/N) Y
4. Does the topographic map provide:
   a. contours at a maximum interval of two-feet? (Y/N) Y
   b. locations and illustrations of man-made features (e.g., parking lots, factory buildings, drainage ditches, storm drains, pipelines, etc.)? (Y/N) Y
   c. descriptions of nearby water bodies? (Y/N) Y
   d. descriptions of off-site wells? (Y/N) Y
   e. site boundaries? (Y/N) Y
   f. individual RCRA units? (Y/N) Y
   g. delineation of the waste management area(s)? (Y/N) Y
   h. well and boring locations? (Y/N) Y
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) Y
   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? No
      o vertically nested piezometers in closely spaced separate boreholes? No
      o monitoring wells ✓

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

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

Fiberglass Tape Measure

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

i. Has the owner/operator provided a site water table (potentiometric) contour map? If yes,
- o Do the potentiometric contours appear logical and accurate based on topography and presented data? (Consult water level data) (Y/N) Y
- o Are ground-water flow-lines indicated? (Y/N) Y
- o Are static water levels shown? (Y/N) Y
- o Can hydraulic gradients be estimated? (Y/N) Y

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

k. Do the owner/operator's flow nets include:
- o piezometer locations? (Y/N) Y
- o depth of screening? (Y/N) N
- o width of screening? (Y/N) N
- o measurements of water levels from all wells and piezometers? (Y/N) Y

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) N
— Deep well injection (Y/N) N
— Seasonal variations (Y/N) Y
— Other (specify) _____

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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) Y

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) N

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) N
   - o Multiple-well tests (pump tests) (Y/N) Y
   - o Other (specify)

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) N/A

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 ✓
   - o Storage coefficient
   - o Leakage
   - o Permeability ✓
   - o Porosity
   - o Specific capacity
   - 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
o Are soil boring/test pit logs included? (Y/N) Y
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) Y
o If yes, how was continuity demonstrated?
Silurian Bedrock, Eighteen boreholes were cored a minimum of 10 ft. into the dolomite

c. What is hydraulic conductivity of the confining unit (if present)? 10^{-6}-10^{-8} CM/Sec
How was it determined? laboratory testing of core samples

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? Supplemental Hydrogeologic Investigation 1) Soil & Bedrock Borehole 2) Bedrock Piezometers 3) Bin Level Permanents

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 ✓
o Solid-stem auger ✓
o Mud rotary ✓
o Air rotary ___
o Reverse rotary ___
o Cable tool ___
o Jetting ___
o Air drill with casing hammer ___
o Other (specify) ___

b. Were any cutting fluids (including water) or additives used during drilling? (Y/N) Y
If yes, specify
Type of drilling fluid WATER
Source of water used WELL
Foam NO
Polymers NO
Other ___

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c. Was the cutting fluid, or additive, identified? (Y/N) Y

d. Was the drilling equipment steam-cleaned prior to drilling the well? (Y/N) Y

Other methods _____

e. Was compressed air used during drilling? (Y/N) N

o If yes, was the air filtered to remove oil? (Y/N) N/A

f. Did the owner/operator document procedure for establishing the potentiometric surface? (Y/N) Y

o If yes, how was the location established?

Bore holes
installation of piezometers
installation of monitoring wells

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? 5' originally. Continuous during UNOCALS HYDROGEO. INVEST. & required under the 1987 CAFO.

o How were the samples obtained?

- Split spoon ✓
- Shelby tube _____
- Core drill ✓
- Other (specify) _____

o Identify if any physical and/or chemical tests were performed on the formation samples (specify) _____

2. Monitoring Well Construction Materials

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

	Material	Diameter (ID/OD)
o Primary Casing	PVC	4" PVC 2" 5
o Secondary or outside casing (double construction)	SS not in All	6"
o Screen	PVC	2" or 4"

b. How are the sections of casing and screen connected?

o Pipe sections threaded ✓

o Couplings (friction) with adhesive or solvent _____

o Couplings (friction) with retainer screws _____

o Other (specify) Glued

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

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?
20' (MW-1, MW-2, MW-3, MW-5, & MW-6) 30' MW-4
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? Dropped
o What are the dimensions of the filter pack? 1' to 12' above screen
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) Y
c. Well development
Was the well developed? (Y/N) Y
o What technique was used for well development?
- Surge block ___
- Bailer ✓
- Air surging ___
- Water pumping ___
- 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) ___
- Cement (specify neat or concrete) ___
- Other (specify) Bentonite pellets
o Was the seal installed by?
- Dropping material down the hole and tamping ✓
- Dropping material down the inside of hollow-stem auger ___
- Tremie pipe method ___
- Other (specify) ___
b. Was a different seal used in the unsaturated zone? (Y/N) N
If yes,
o Was this seal made with?
- Sodium bentonite (specify type and grit) ✓
- Cement (specify neat or concrete) ___
- Other (specify) ___

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

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) 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?
500' +

c. Does the owner/operator provide a rationale for the location of each monitoring well or cluster? (Y/N) Y
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) Y
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) Y
b. Does the owner/operator provide an explanation for the location(s) of the upgradient monitoring wells? (Y/N) Y
c. What length screen has the owner/operator employed in the background monitoring well(s)?
20'

d. Does the owner/operator provide an explanation for the screen length(s) chosen? (Y/N) Y
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) Y
   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) Y
2. Does the list of monitoring parameters include all hazardous waste constituents from the facility? (Y/N) Y
   a. Does the water quality parameter list include other important indicators not classified as hazardous waste constituents? (Y/N) Y
   b. Does the owner/operator provide documentation for the listed wastes which are not included? (Y/N) Y
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) Y
4. Has the owner/operator specified a schedule of implementation in the assessment plan? (Y/N) Y
5. Have the assessment monitoring objectives been clearly defined in the assessment plan? (Y/N) Y
   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) Y
   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) Y
   c. Does the plan call for determining the concentrations of hazardous wastes and hazardous waste constituents in the ground water? (Y/N) Y
   d. Does the plan employ a quarterly monitoring program? (Y/N) Y
6. Does the assessment plan identify the investigatory methods that will be used in the assessment phase? (Y/N) Y
   a. Is the role of each method in the evaluation fully described? (Y/N) Y
   b. Does the plan provide sufficient descriptions of the direct methods to be used? (Y/N) Y
   c. Does the plan provide sufficient descriptions of the indirect methods to be used? (Y/N) Y
   d. Will the method contribute to the further characterization of the contaminant movement? (Y/N) Y
7. Are the investigatory techniques utilized in the assessment program based on direct methods? (Y/N) Y
   a. Does the assessment approach incorporate indirect methods to further support direct methods? (Y/N) N
   b. Will the planned methods called for in the assessment approach ultimately meet performance standards for assessment monitoring? (Y/N) N

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c. Are the procedures well defined? (Y/N) Y

d. Does the approach provide for monitoring wells similar in design and construction as the detection monitoring wells? (Y/N) N

e. Does the approach employ taking samples during drilling or collecting core samples for further analysis? (Y/N) Y

8. Are the indirect methods to be used based on reliable and accepted geophysical techniques? (Y/N) N

a. Are they capable of detecting subsurface changes resulting from contaminant migration at the site? (Y/N) N/A

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) Y

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) Y

9. Does the assessment approach incorporate any mathematical modeling to predict contaminant movement? (Y/N) N

a. Will site specific measurements be utilized to accurately portray the subsurface? (Y/N) N/A

b. Will the derived data be reliable? (Y/N) 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) Y

J. Conclusions

1. Subsurface geology

a. Has sufficient data been collected to adequately define petrography and petrographic variation? (Y/N) Y

b. Has the subsurface geochemistry been adequately defined? (Y/N) Y

c. Was the boring/coring program adequate to define subsurface geologic variation? (Y/N) Y

d. Was the owner/operator's narrative description complete and accurate in its interpretation of the data? (Y/N) Y

e. Does the geologic assessment address or provide means to resolve any information gaps? (Y/N) Y

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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) Y
b. Were appropriate methods used to establish ground-water flowpaths? (Y/N) Y
c. Did the owner/operator provide accurate documentation? (Y/N) Y
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) Y
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) Y

3. Uppermost aquifer

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

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) N
b. Are the samples representative of ground-water quality? (Y/N) N
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) N

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) N

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6. Assessment Monitoring

a. Has the owner/operator adequately characterized site hydrogeology to determine contaminant migration? (Y/N) Y
b. Is the detection monitoring system adequately designed and constructed to immediately detect any contaminant release? (Y/N) N
c. Are the procedures used to make a first determination of contamination adequate? (Y/N) Y
d. Is the assessment plan adequate to detect, characterize, and track contaminant migration? (Y/N) 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) Y
f. Are the assessment monitoring wells adequately designed and constructed? (Y/N) Y
g. Are the sampling and analysis procedures adequate to provide true measures of contamination? (Y/N) Y
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) Y
i. Are the data collected at sufficient frequency and duration to adequately determine the rate of migration? (Y/N) Y
j. Is the schedule of implementation adequate? (Y/N) Y
k. Is the owner/operator's assessment monitoring plan adequate? (Y/N) N
   o If the owner/operator had to implement his assessment monitoring plan, was it implemented satisfactorily? (Y/N) 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) Y

B. Monitoring well construction:
1. Identify construction material

	Material	Diameter
a. Primary Casing	STAINLESS STEEL & PVC	SS - 2" PVC - 4"
b. Secondary or outside casing	STAINLESS STEEL (NOT ALL WELLS)	6"

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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?

_____

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

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/A

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

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?
   bailer

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

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) Y

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) N/A

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? Dedicated Sampling Equipment. (Y/N) N/A

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) N/A
    b. Tap water rinse? (Y/N) N/A
    DID NOT SAMPLE FOR ORGANICS

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

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

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? SAMPLED with bailer. No VOCs were taken. (Y/N) N/A

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) Y

IV. <u>Review of Sample Preservation and Handling Procedures</u>

A. Sample containers:

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) N/A
   Organics were not taken.

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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) N
   b. 1:1 nitric acid rinse? (Y/N) Y
   c. Tap water rinse? (Y/N) N
   d. 1:1 hydrochloric acid rinse? (Y/N) N
   e. Tap water rinse? (Y/N) N
   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) N
   b. Tap water rinse? (Y/N) N
   c. Distilled/deionized water rinse? (Y/N) Y
   d. Acetone rinse? (Y/N) N
   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:

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

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

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

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

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

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

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

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) Y

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) Y

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

V. <u>Review of Chain-of-Custody Prodecures</u>

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) Y

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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) Y

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) Y
b. Location of well(s)? (Y/N) Y
c. Total depth of each well? (Y/N) Y
d. Static water level depth and measurement technique? (Y/N) Y
e. Presence of immiscible layers and detection method? (Y/N) Y
f. Collection method for immiscible layers and sample identification numbers? (Y/N) Y
g. Well evacuation procedures? (Y/N) Y
h. Sample withdrawal procedure? (Y/N) Y
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) Y
l. Preservative(s) used? (Y/N) Y
m. Parameters requested? (Y/N) Y
n. Field analysis data and method(s)? (Y/N) Y
o. Sample distribution and transporter? (Y/N) Y
p. Field observations? (Y/N) Y
o Unusual well recharge rates? (Y/N) Y
o Equipment malfunction(s)? (Y/N) Y
o Possible sample contamination? (Y/N) Y
o Sampling rate? (Y/N) Y

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) Y
b. Date of sample receipt? (Y/N) Y
c. Laboratory sample number (if different than field number)? (Y/N) Y
d. Analyses to be performed? (Y/N) Y

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

B. Does the QA/QC program include:

1. Documentation of any deviations from approved procedures? (Y/N) Y

2. Documentation of analytical results for:

a. Blanks? (Y/N) Y
b. Standards? (Y/N) Y
c. Duplicates? (Y/N) Y
d. Spiked samples? (Y/N) Y
e. Detectable limits for each parameter being analyzed? (Y/N) Y

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

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

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

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) Y

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

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) Y

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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) 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) Y

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STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY
INSPECTION REPORT

USEPA Number: ILD041550567 IEPA Number: 1978030004

Facility Name: Union Oil Co. of California (DBA - UNOCAL)

Street: New Ave. & 135th St.
City: Lemont Telephone: 312/257-7761
County: Will State: IL Zip Code: 60439

Type of Facility: Notified As: Gen, Trans, TSD Regulated As: Gen, Disposal
LDF? yes ✓ no __ HPV? yes __ no ✓ 90 Day Follow-up Required? yes __ no ✓

Region: II Date of Inspection: 3-21-88 From: 1080 0A to 2:00 P
Weather (LDF Only): DRY 40°F

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, 7-28-80, from initial ✓ or subsequent __ notification.

Part A date, 3-9-87, from initial __ or amended ✓ Part A withdrawan: ____

Part B permit application submitted? 11-6-80 yes ✓ no __

Has the firm been referred to: USEPA? yes ✓ no __; IAG? yes __ no ✓; County States Attorney? yes __ no ✓. Date of referral to USEPA: 8-5-86, IAG: ____, County States Attorney: ____. USEPA ref to DOJ? yes — no ✓

Federal Court Order Issued: ____ State Court Order Issued: ____

USEPA CACO Issued: ____ CAFO Issued: 12-17-86 ALJ Decision 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 85	S6	S7
D81	Y	Y	Y	N	N	N	*N	*N	*N
*- No waste put in landfarms since 9-81									

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Operator: Tom Williams Telephone #: 312/257-7761

Street: 135th & New Av.

City: Lemont State: IL Zip Code: 60439

Owner: Unocal Chicago Refinery Telephone #: 312/257-7761

Street: SAME AS ABOVE

City: State: Zip Code:

Person Interviewed	Title	Telephone #
L. D. Erchull	Envir. Science Anal.	312/257-7761

Inspection Participants	Agency/Title	Telephone #

Prepared By	Agency/Title	Telephone #
James T. Brunfeldt	IEPA/EPSI	312/345-9780

~~N.O.~~ Apparent Violations

Area	Class	Section

Area	Class	Section

Area	Class	Section

WASTE DISPOSITION FORM

Facility Name: Union Oil Company of California USEPA #: ILD041550567 IEPA #: 1978030004

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 85 *	86 *	87 *	Amount on Site	Rate of Generation	Last Manifested Shipment	Disposition
Slop oil Emulsion solid	Slop oil tanks after cleaning	10/87	K049		N only A generator	N	N	Y	0	SEE NOTE 1 IN NARRATIVE	10/2/87	CID FOR Disposal
HEAT EXCHANGER CLEANING SLUDGE	Heat exchanger bundles after cleaning	10/87	K050		N only A generator	N	Y	Y	0		10/29/87	CID For Disposal
API SEPERATOR SLUDGE	API SEPARATOR AFTER CLEANING	10/87	K051		N only A generator	N	Y	Y	0		7/17/87	CID FOR Disposal
LEADED TANK BOTTOMS	CLEANING LEADED gasoline STORAGE tanks	10/87	K052		N only A generator	Y	Y	Y	0		4/21/87	CID FOR Disposal
Spent Nickel Catalyst	Reformer unit desulfurizing catalyst	10/87	D001		N only A generator	N	Y	Y	0	769 gal every 2 yrs.	2/3/87	Gulf Chemical Freeport, TX Recovery
Spent Platinum catalyst	CAT Reforming unit.	10/87	D001		N	N	Y	N	0	990 gal per yr	7/21/86	Universal Oil Products Shreveport, LA Recovery

* All "No" responses must be explained in the narrative.

NARRATIVE

Unocal Corporation is a petroleum refinery which processes crude oil into finished petroleum products such as gasoline, fuel oils and other related products. Unocal's other activities includes marketing.

Hazardous Waste Generated

1. Slop oil Emulsion Solid (K049)
   - Generated from the cleaning of slop oil tanks.
   - Rate of generation is dependent on how often tanks are cleaned.
   - Last shipment was to CID landfill on 10/2/87.
   - None was currently on-site.

2. Heat exchanging cleaning Sludge (K050)
   - Generated from the cleaning of the heat exchanges bundles.
   - Rate of generation depends on how often the bundles are cleaned.
   - Last shipment was to CID landfill on 10/29/87.
   - None was currently on-site.

3. API Separator Sludge (K051)
   - Generated from the cleaning of the API separator.
   - Rate of generation is dependent on how often the API separator is cleaned.
   - last shipment was to CID landfill on 7/17/87.
   - None was currently on-site.

4. Leaded Tank Bottoms (K052)
   - Generated from the cleaning of the leaded gasoline tanks.
   - Rate of generation is dependent upon how often the tanks are cleaned.
   - Last shipment was to CID landfill on 4/21/87.
   - None was currently on-site.

5. Spent Nickel Catalyst (D001)
   - Used as a desulfurizing catalyst in the reformer unit.
   - Rate of generation is 769 gals. every 2 years.
   - Last shipment was to Gulf Chemical on 2/3/87 for recovery.
   - None was currently on-site.

7. Spent Platinum Catalyst (D001)
   - Generated from the reforming unit.
   - Rate of generation is 990 gals per year.
   - last shipment was to Universol Oil for recovery on 7/21/86.
   - NONE WAS CURRENTLY ON-SITE.

NOTES:

1. Hazardous waste K049 - K052 on the waste disposition do not have a definite rate of generation since the processes from which they are coming, are not regularly cleaned. The time frame between cleaning varies,

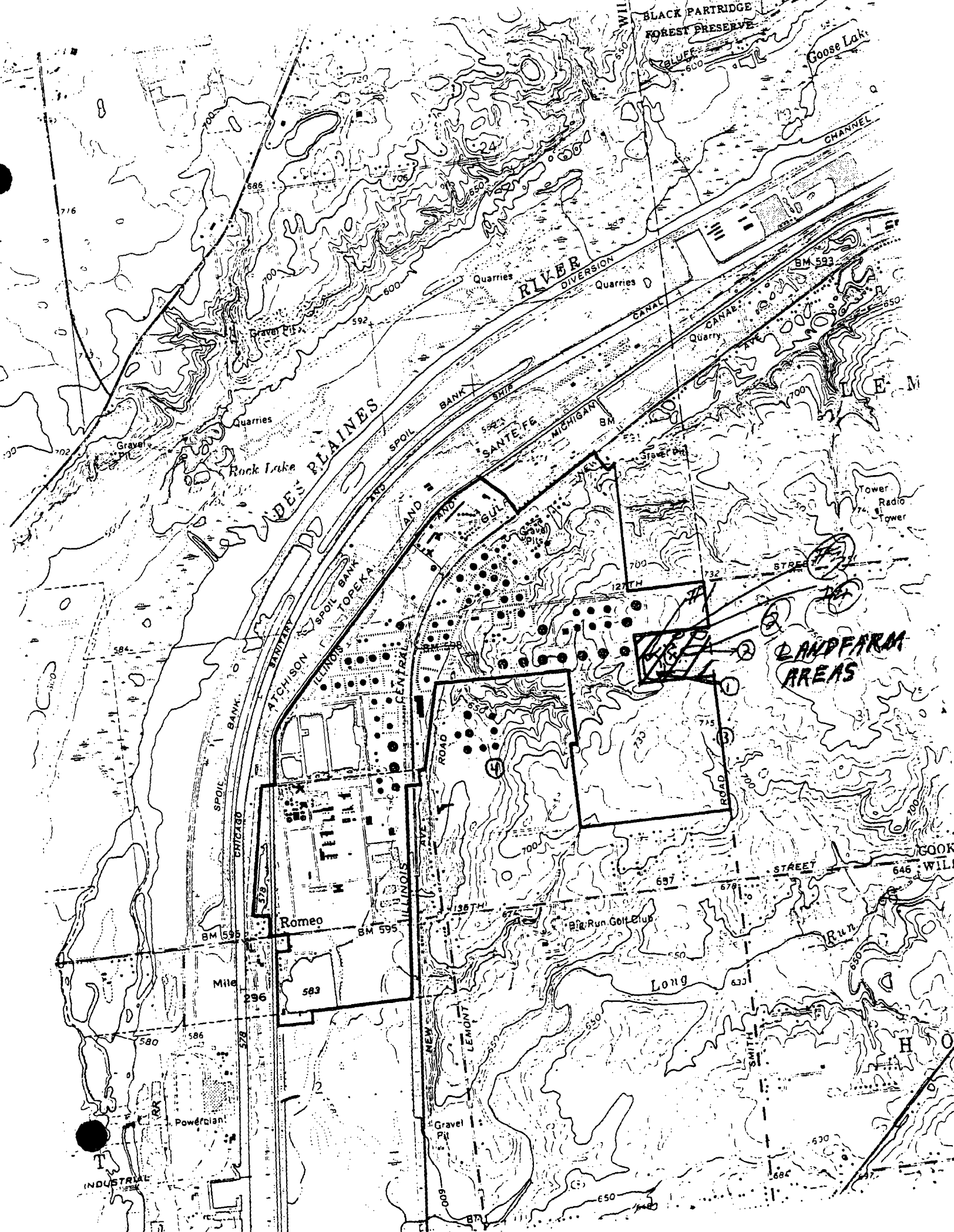
2. Four accumulation areas are located on-site, the cleaning building (see photo #1), the alkylation unit area (see photo #3), the north plant bundle cleaning area (see photo #5) and the waste staging area (see photo #4). No waste was on-site during this inspection.

HAZARDOUS WASTE UNIT

1. Three landfarms(D81)- These units have not been used since September of 1981. However, closure has not been conducted and the units are still regulated under RCRA.

No apparent violations were noted during the inspection.

Karen T. Grumfeld


BLACK PARTRIDGE
FOREST PRESERVE
Goose Lake
CHANNEL
DIVERSION
CANAL
RIVER
Quarries
Quarry
Gravel Pit
Rock Lake
DES PLAINES
SPOIL BANK
SHIP
SANTE FE
MICHIGAN
AND
GULF
ATCHISON
TOPEKA
ILLINOIS
CENTRAL
SANITARY
CHICAGO
Tower
Radio
Tower
127TH
STREET
LANDFARM
AREAS
ROAD
ILLINOIS
AVE
Romeo
BM 595
Mile
296
583
136TH
Big Run Golf Club
Long
Run
LEMONT
NEW
SMITH
Powerplant
INDUSTRIAL
Gravel
Pit

Area	Cl	Day F/U Req	Key Ltr / Sub-sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
				PART 722 GENERATOR STANDARDS: Subpart A: General				
OTH	1		B, C, F, G, I, J	Section 722.111: Hazardous Waste Determination	X			
				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 ___				
			B	Section 722.112: USEPA Identification Number	X			
			§ 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	Cl	90 Day F/U Req	Key Ltr / Sub-sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
MAN	2			PART 722 GENERATOR STANDARDS Subpart B: The Manifest				
				Section 722.120: General Requirements	X			
			§ 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 generaused 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 ✓				Facility used TEXAS & LOUISIANA MANIFESTS.
			§ 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.				
			§d)					

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Area		90 Day F/U	Key Ltr.	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Numb
			e)	Does the generator produce greater than 100 kg but less than 1000 kg of hazardous waste in a calendar month where, the waste is reclaimed under a contractual agreement pursuant to which:				N/A No contractual agreements.
			e)1)A)	The type of waste and frequency of shipments are specified in the agreement: yes — no —				
			e)1)B)	The vehicle used to transport the waste to the recycling facility and to deliver regenerated material back to the generator is owned and operated by the reclaimer of the waste; and yes — no —				
			e)2)	Does the generator maintain a copy of the reclamation agreement in his files for a period of at least three years after termination of expiration of the agreement. yes — no —				
				Note: If the answers to all the above questions were "yes," the generator need not comply with the requirements of this subpart for those wastes.				

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Area	[illegible]	90 Day F/U	Key Ltr Sub Sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Numbe[illegible]
			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 ____ N/A ____				WASTE brought Back to facility
MAN	2			Section 722.121 Acquisition of Manifests	X			
			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	X			
				Does the manifest the generator is using consist of at least six copies (plus one copy for each additional transporter)? Yes ✓ No ____				

Area	[illegible]	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	X			
			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 ✓				No Bulk shipments by water or rail
			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		90 Day F/U	Key Ltr Sub Sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
				Part 722				
				GENERATOR STANDARDS				NO WASTE WAS CURRENTLY ON-SITE.
				Subpart C: Pre-transport Requirements				
				Section 722.130 Packaging	___	___	X	
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	___	___	X	
				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	___	___	X	
			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 Ltr 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 ___	___	___	X	Transporters supply their own placards
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).	X	___	___	THE FACILITY ONLY ACCUMULATES HAZ. WASTE but they ARE STILL REGULATED FOR THEIR LANDFARMS; BUT NO WASTE HAS BEEN PLACED IN THE LANDFARMS SINCE 9/81.

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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
			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. listed below:				NO, CONTAINERS WERE ON-SITE DURING THE INSPECTION
				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 ✓				
				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 ___ N/A ✓				
				Management of Containers				
				Are containers of hazardous waste always closed during storage? Yes ___ No ___ N/A ✓				
				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 ___ N/A ✓				

C-M-C-3

Area	Cl	Day F/U	Key Ltr Sub-Sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
				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.				
				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 ___ N/A ✓				NO CONTAINERS WERE CURRENTLY ON-SITE
				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 ___ N/A ✓				NO incompatible WASTE

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Area	Cl[illegible]	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 tanks, has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subpart J: Tanks, listed below:				NO TANKS
				General Operating Requirements				N/A
				Is the treatment or storage of hazardous wste in tanks in compliance with Section 725.117(b) (General Requirements for Ignitable, Reactive or Incompatible Wastes) ? Yes ___ No ___ N/A ✓				
				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 ___				
				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 ___				
				Is a tank which has a continuous feed of hazardous waste into it equipped with a means to stop this inflow? Yes ___ No ___				

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Area	Cl	Key	Key Ltr Sub-Sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
			a)3)	For waste in containers and tanks, has the generator marked or labeled each with the words "Hazardous Waste"? Yes ___ No ___ N/A ✓				
			a) 4)	Has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subpart C: Preparedness and Prevention listed below:				
				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 ___				
				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:				SEE 725 part of checklist
				An internal communications or alarm system capable of providing immediate emergency instructions? Yes ✓ No ___ N/A ___				

(-N-C-9)

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Area		90 Day F/U	Key Ltr Sub Sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Num
				Part 722				
				GENERATOR STANDARDS Subpart D: Record keeping and Reporting				
OTH	2			Section 722.140 Recordkeeping Has the generator retained for a period of three years:	X			
			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 ✓				NONE REQUIRED
			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 ✓				NO UNRESOLVED ENFORCEMENT ACTIONS
			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 ✓				NO REQUESTS
OTH	2			Section 722.141 Annual Reporting	X			
			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		90 Day F/U	Key Ltr Sub Sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Numb
			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 722.142 Exception Reporting	____	____	X	NONE 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____				

Area	CI	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 ____	___	___	X	NOT REQUIRED
OTH	2			Section 722.144 Special Requirements for Generators of Between 100 and 1000 kilograms of per Month. Has the generator retained for a period of three years: - A copy of each signed manifest? Yes ___ No ___	___	___	X	Fully Regulated GENERATOR

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Area		90 Day F/U	Key Ltr Sub Sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Numb
				Part 722				
				GENERATOR STANDARDS				
				Subpart E: Special Conditions				
OTH	1			Section 722.150 International Shipments	___	___	X	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		90 Day F/U	Key Ltr Sub Sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Hugh
			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 722.151 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 ___	___	___	X	NO FARMING ACTIVITY

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			**PART 725** **INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES** **Subpart A: General Provisions** **Section 725.101: Purpose, Scope and Applicability** Does the facility qualify for any of the exemptions under Section 725.101(c)? Yes ____ No ✓ **NOTE: If "Yes", explain in narrative.**	X			Although UNOCAL is only accumulating HAZ. waste, the facility is still regulated for the landfarms until closure has been conducted.
			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 ✓				Facility does not handle these wastes.

JL 532-1592
LPC 258 8/87

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**	X			
				Has the facility obtained a USEPA identification number?				
OTH	1			**Section 725.112: Required Notices**			X	
			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 ✓				NOT RECEIVING WASTE FROM FOREIGN SOURCES.
			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 ✓				NO TRANSFER OF OWNERSHIP OR OPERATION OF FACILITY
OTH	1			**Section 725.113: General Waste Analysis**	X			
			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 ____				

JL 532-1502
LPC 258 8/87

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 ✓				PROCESS GENERATING WASTE HAS NOT CHANGED. NOT AN off-site FACILITY.
			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 ___				

IL 532-1592
LPC 256 6/87

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 ___ n/a ✓				NOT AN off-site Facility

JL 532-1502
LPC 250 8/87

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 ✓				NOT AN off-site Facility
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 ✓	X			

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 ___				guards
				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 ___				fences
			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.**				

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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	2			**Section 725.115: General Inspection Requirements**	X			
			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 ___				

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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
				- 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.**				FACILITY DOES NOT HAVE THESE UNITS IEPA-DLPC
			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 ____ N/A ✓				NO DETERIORATION OR MALFUNCTION OF EQUIPMENT OR STRUCTURES HAVE BEEN ENCOUNTERED.
			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 ✓				NO HAZARDS HAVE OCCURRED.
			d	Does the owner or operator record the results of inspections in a log or summary? Yes ✓ No ____				
			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**	X			
				Does the facility have a training program? Yes ✓ No ___				On-the-job and classroom.
				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 ___				

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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
				B) Key parameters for automatic waste feed cutoff systems? Yes ___ No ___ N/A ✓				NO AUTO-WASTE FEED.
				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 ✓				NO NEW EMPLOYEES
			c	Has the facility conducted an annual review of the initial training? Yes ✓ No ___ N/A ___				Last review was 11-10-87
			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 ___				

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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.
				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**	X			
			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 ____				

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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	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 ___				

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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
				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.**	X			

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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 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**	X			
				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**	X			
				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 ___				PA, telephones, 2way radios, fire alarm.
			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 ___				telephones

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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
			c	- Portable fire extinguishers, fire control equipment, spill control equipment and decontamination equipment? Yes ✓ No ___ N/A ___				fire extinguishers oil dry
			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 ___				auto-sprinkler system
				NOTE: Any "N/A" answers must be explained in the Remarks column.				
OTH	1	X		**Section 725.133: Testing and Maintenance of Equipment**	X			
				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 ___				daily
				- Fire protection equipment? Yes ✓ No ___ N/A ___				monthly
				- Spill control equipment? Yes ✓ No ___ N/A ___				
				- Decontamination equipment? Yes ✓ No ___ N/A ___				
				NOTE: Any "N/A" answer must be explained 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
OTH	1	X		**Section 725.134: Access to Communications or Alarm Systems**	X			
			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 ✓				NEVER JUST ONE EMPLOYEE ON-SITE
OTH	1	X		**Section 725.135: Required Aisle Space**	X			
				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 ✓				
OTH	2			**Section 725.137: Arrangements with Local Authorities**	X			
			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:				

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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
				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 ____				Romeo/Lemont fire & police depts.
				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 ____				petro-chem. contractors
				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 ____				St. Joseph & Silver Cross.
				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 ✓				no refusals

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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 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**	X			
			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 ✓				Plan never implemented.
OTH	2			**Section 725.152: Content of Contingency Plan**	X			
			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 ___				

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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.
				3) Unplanned sudden or non-sudden releases of hazardous waste or hazardous waste constituents to air, soil, or surface water? Yes ✓ No ___				
			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 ___				D.W. Bruckert
			e	Does the plan identify:				
				1) A list and physical description of all emergency equipment at the facility? 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.
				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**	X			
			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 ___				

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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	2			**725.154: Amendment of Contingency Plan**	X			Applicable regulations not revised in a way which would require amending plan.
				Has the contingency plan been reviewed and, if necessary, amended whenever:				
			a	1) Applicable regulations are revised? Yes ___ No ___ N/A ✓				
			b	2) The plan fails in an emergency? Yes ___ No ___ N/A ✓				Plan never implemented.
			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 ✓				No changes
			d	4) The list of emergency coordinators changes? Yes ✓ No ___				
			e	5) The list of emergency equipment changes? Yes ___ No ___ N/A ✓				No changes in emer. equipment.
OTH	2			**Section 725.155: Emergency Coordinator**	X			
				Is there an emergency coordinator on-site or on-call at all times? 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
				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	1/2			**Section 725.156: Emergency Procedures**			X	
				Has the facility had a release, fire or explosion? Yes ___ No ✓				NO FIRES, EXPLOSIONS OR RELEASES.
				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.				

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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
MAN	1			**PART 725** **INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES** **Subpart E: Manifest System, Recordkeeping and Reporting** **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:			X	NO WASTE ACCEPTED FROM off-site
			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 ____				

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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.
			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.**			X	Not Receiving waste from off-site.
			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 ____				

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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	2			**Section 725.173: Operating Record**	X			
			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 ✓				NO WASTE IS CURRENTLY BEING DISPOSED OF ON-SITE.

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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
				6) A cross reference by manifest number to location and quantity of hazardous waste? Yes ____ No ____ N/A ✓				NOT REQUIRED
				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 ✓				FACILITY DOES NOT HAVE THESE UNITS
				- 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 ✓				FACILITY DOES NOT HAVE THESE UNITS
				- 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 ✓				PLAN NEVER IMPLEMENTED

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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
				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 ✓				NOT ADDRESSED During this inspection.
				- 725.194 (G.W. Monitoring)? Yes ____ No ____ N/A ✓				
				- 725.376 (Land Treatment)? Yes ____ No ____ N/A ✓				NOT REQUIRED
				- 725.378 (Land Treatment)? Yes ✓ No ____ N/A ____				
				- 735.380(d)(1) (Land Treatment)? Yes ____ No ____ N/A ✓				NOT REQUIRED
				- 725.447 (Incinerators)? Yes ____ No ____ N/A ✓				Facility DOES NOT HAVE THESE UNITS
				- 725.477 (Thermal Treatment)? Yes ____ No ____ N/A ✓				
				NOTE: Data required under 725.194 must be kept throughout the post-closure period.				

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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
				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**	X			
			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:				CLOSURE HAS NOT OCCURRED YET.
				- The Agency? Yes ___ No ___ N/A ✓				
				- 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 ✓				NO UNRESOLVED ENFORCEMENT ACTIONS OR REQUESTS BY 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	2			**Section 725.175: Annual Report**			X	NONE REQUIRED
				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?				NOT STORING OR DISPOSING OR TREATING WASTE.
OTH	1			**Section 725.176: Unmanifested Waste Report**			X	
				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 ____				NO OFF-SITE WASTE ACCEPTED.

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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
				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**			X	NONE Required
				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 ____				

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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
CLO	1			**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**				
				Section 725.212: Closure Plan	X			
			a	Was the most current facility closure plan available during the inspection? Yes ✓ No ___	X			
				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 ___	X			
				- 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 ✓				Facility hasn't closed, only surface impoundment
				- 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 ✓				Facility Does not have these units
				- 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 ___	X			

In Apparent Compliance? Yes	In Apparent Compliance? No	Not Applicable	Remarks or Comment No.
			Interim status has not been terminated No judicial decrees

IL 532-1502
LPC 258 8/87

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 725.381: Special Requirements for Ignitable or Reactive Wastes**			X	No ignitables or Reactives
			a	Have ignitable or reactive wastes been land treated by immediately incorporating them into the soil 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 ✓				
			b	Is the waste managed in such a way that it is protected from any material or conditions which may cause it to ignite or react? Yes ___ No ___ N/A ✓				
OTH	1			**Section 725.382: Special Requirements for Incompatible Wastes**			X	No incompatibles
				Is the owner or operator complying with the requirements concerning the land treatment of incompatible wastes or incompatible wastes and materials contained in this Section? Yes ___ No ___ N/A ✓				

IL 532-1502
LPC 256 8/87

Date: 3/21/88

Time: 10:00A

Photograph By:

Darren T. Brumfield

County: Will

IEPA #: 1973030004

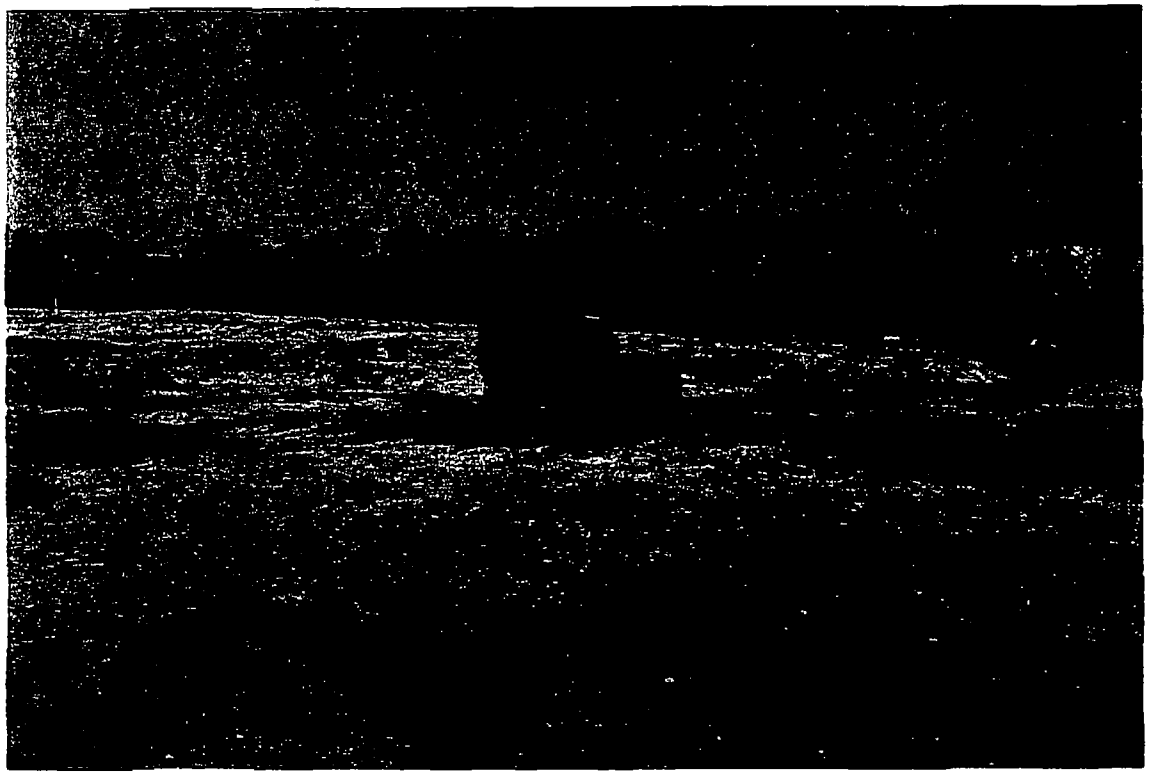
Site Name:

UNOCAL

Comments: photo of West Landfarr Area Looking north.

P 88-2

(9)



(7)

Date: 3/21/88

Time: 10:00A

Photograph By: DTB

Darren T. Brumfield

County: Will

IEPA #: 1978030004

Site Name:

UNOCAL

Comments: photo of North Landfarm area. Looking South

RE 88-2

(8)

Date: 3/21/88

Time: 10:00A

Photograph By: DTB

Darren T. Brumfield

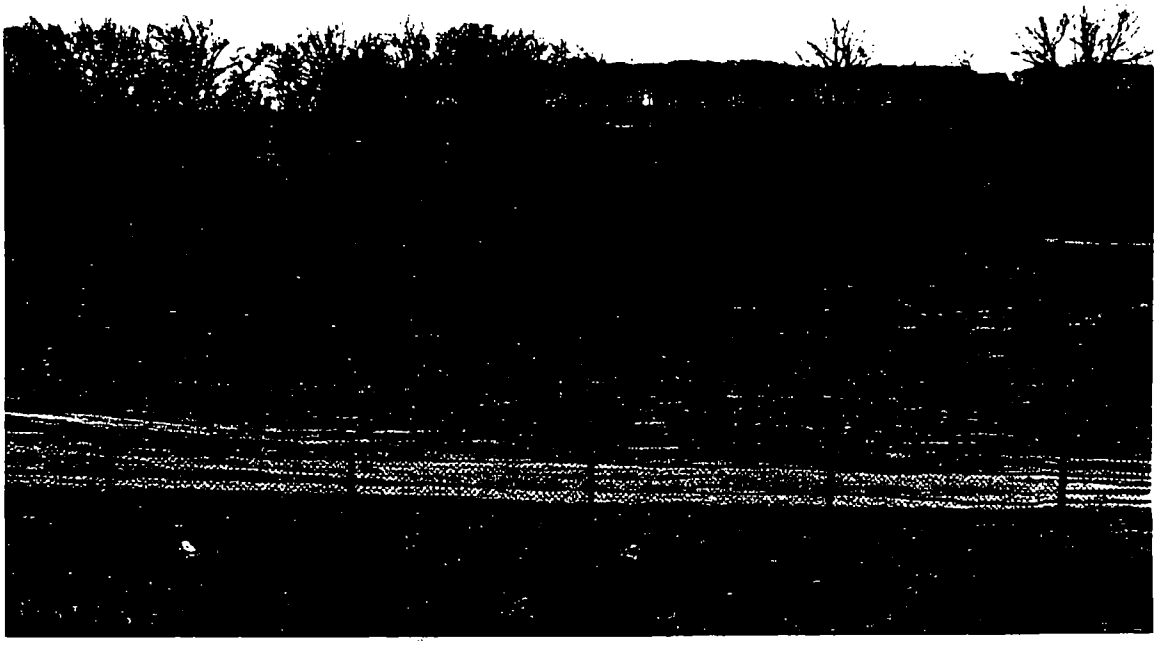
County: Will

IEPA #: 1978030004

Site Name:

UNOCAL

Comments: photo of North Landfarm area. Looking South



STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY
INSPECTION REPORT

USEPA Number: ILD041550567 IEPA Number: 1978030004

Facility Name: Unocal (Chicago Refinery)

Street: 135th Street at New Avenue
City: Lemont Telephone: 312/2577761
County: Will State: Ill. Zip Code: 60439

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

Region: 2 Date of Inspection: ~~FEB 5-6, 1987~~ From: 8:00am to 1:00pm
Weather (LDF Only): ≈ 40°F - partly cloudy

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

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

Notified As/Regulated As Matrix Number: 61 Key Letter: G

Notification date, 8-15-80, from initial X or subsequent __ notification.

Part A date, 7-13-84, from initial __ or amended X Part A. 11-6-80

Part B permit application submitted? yes X no __

Has the firm been referred to: USEPA? yes X no __; IAG? yes __ no __; Count States Attorney? yes __ no __. Date of referral to USEPA: 8-5-86, IAG: N/A, County States Attorney: N/A.

Federal Court Order Issued: N/A State Court Order Issued: N/A

USEPA Compliance Order Issued: 12-17-81 Illinois PCB Order Issued: N/A

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
D-81	yes	yes	yes	NO	NO	N/A	NO	NO	NO
S-04	yes	yes	yes	PLAN SUBMITTED NOT YET CLOSED	NO	N/A	NO	NO	NO
S-02	yes	NO	NO	DELETED	NO	N/A	NO	NO	NO

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Operator: Unocal Telephone #: 312/2577761

Street: 135th Street at New Avenue

City: Lemont State: Ill. Zip Code: 60439

Owner: Unocal Telephone #: 312/2577761

Street: 135th Street at New Avenue

City: Lemont State: Ill. Zip Code: 60439

Person Interviewed	Title	Telephone #
Leo Eschrall	Env. Science Analyst	312/2577761

Inspection Participants	Agency/Title	Telephone #
James R. Wiggins	IEPA/EPS	312/3459780

Prepared By	Agency/Title	Telephone #
James R. Wiggins	IEPA/EPS	312/3459780

Summary of Apparent Violations

Area	Class	Section

Area	Class	Section

Area	Class	Section

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WASTE DISPOSITION FORM

Facility Name: Gasoil (Chicago Refinery) USEPA #: ILD045550567 IEPA #: 1978030004

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 83 *	84 *	85 *	Amount On Site	Rate of Generation	Last Manifested Shipment	Dispsition
HEAT EXCHANGER CLEANING SLUDGE	CLEANING OF HEAT EXCHANGERS	1-86	K050		NO	yes	yes	NO	NONE	8,000 gal/year	12-3-86	LANDFILL
API SEPERATOR SLUDGE	ROUTINE REFINERY OPERATIONS	1-86	K051		yes	yes	yes	NO	NONE	10,000 gal/year	12-26-86	LANDFILL
LEADED TANK BOTTOMS	ROUTINE TANK CLEANING	1-86	K052		NO	NO	NO	yes	NONE	14,000 gal/year	7-31-86	LANDFILL
PLATINUM CATALYST	ROUTINE REFINERY OP.		D001		NO	NO	NO	NO	NONE	NONE GENERATED	NONE	RECYCLED
DESULFURIZATION CATALYST	ROUTINE REFINERY OP.	10-86	D001		NO	NO	NO	NO	NONE	UNKNOWN	2-3-87	RECYCLED
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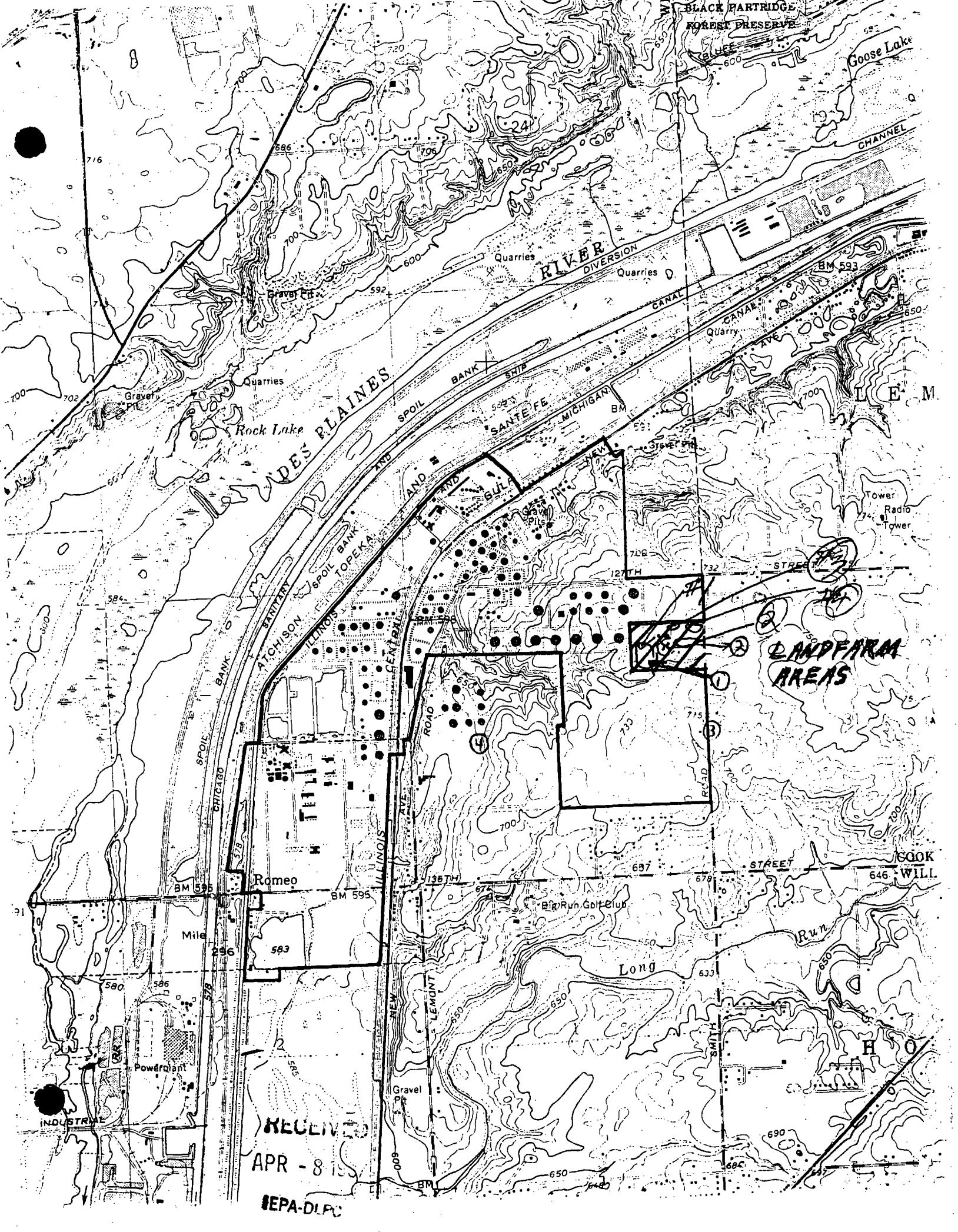
* All "no" responses must be explained in the narrative


BLACK PARTRIDGE
FOREST PRESERVE
Goose Lake
CHANNEL
DES PLAINES RIVER
DIVERSION
CANAL
SPOIL BANK
SHIP
CANAL
Quarries
Quarries
Quarry
Gravel Pit
Rock Lake
SANTE FE
MICHIGAN
AVE
NEW
GULF
AND
TOPEKA
ATCHISON
SANITARY
ILLINOIS
CENTRAL
SPOIL BANK
CHICAGO
Gravel Pits
Tower
Radio Tower
127TH
STREET
LANDFARM AREAS
ROAD
ILLINOIS
AVE
NEW
LEMONT
ROAD
138TH
STREET
COOK
WILL
Romeo
BM 595
Mile
296
583
Big Run Golf Club
Long
Run
SMITH
Powerplant
INDUSTRIAL
Gravel Pit
BM 593
BM 598
BM 595
BM 591
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NARRATIVE

Unocal's Chicago Refinery, located in Lemont, conducts petroleum refining and marketing activities. The facility processes crude oil into finished petroleum products such as gasoline, fuel oil, and other related products.

The Facility past A permit application lists hazardous waste activities of D-81 (land application), and S04 (surface impoundment). The original part A also listed S02 (tank storage) but was subsequently revised to delete this activity because the designated "waste" tank was never employed to store waste.

The facility generates the following RCRA hazardous wastes from routine refinery operations...

1. K050 - Heat exchanger cleaning waste
2. K051 - API separator sludge
3. K052 - Leaded tank bottom waste
4. D001 - Platinum catalyst
5. D001 - Desulfurization catalyst

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All hazardous wastes are accumulated on-site in a designated area for a period of time less than 90-days prior to removal to an off-site facility for disposal or recycle. Currently all hazardous wastes are being sent off-site for disposal and recycle.

Prior to 1981, K051 (API Separator Sludge) was stored in the on site surface impoundment and subsequently land applied on site in one of the four application areas. No hazardous wastes have

NARRATIVE

been placed in the impoundment or on the land application area since 1981. A closure plan for the surface impoundment was filed and approved and closure is being completed. Certification of closure will be submitted in the near future.

Closure of the land application area will also be completed and Unocal anticipates obtaining a Post-Closure Permit for the area.

At the time of the inspection no hazardous wastes were on site in the designated accumulation area. A review of manifest records on file at the facility indicates that wastes are being generated in approximately the following quantities ...

H050 - 8,000 gallons/year

H051 - 10,000 gallons/year

H052 - 14,000 gallons/year

Unocal appears to be following appropriate manifesting and recordkeeping requirements and has not needed to file any manifest exception reports.

Unocal appears to be in compliance with all applicable RCRA interim status requirements with the exception of subpart F groundwater monitoring violations which were referred to USEPA effective 8-5-86. A compliance order was issued 12-17-86 by USEPA and a hearing has been scheduled. No other problems or areas of concern were observed at the time of the inspection.

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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 ____				

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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
				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.				

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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
			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 ____				

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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
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 ✓				no shipments have been made by water
			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 ✓				no shipments have been made by rail

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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
				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 ___				

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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
				- 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 ____	✓			Transporter supplies placards
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).	✓			

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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
			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.				
			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.	—	—	✓	no waste is accumulated or stored in tanks
			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				
			a)3)	For waste in containers and tanks, has the generator marked or labeled each with the words "Hazardous Waste"? Yes ✓ No ___				NO TANKS
			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				

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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
				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:				

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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
				- 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 ✓				no acutely hazardous waste

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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 ✓				no acutely hazardous waste
			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 ✓				" " "

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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
				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____				
			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 ✓				not requested
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____				

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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
			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 ____ NA X				no manifest exception reports have been required

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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
			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 ____				no manifest exception reports have been required
			b)	Does any exception report submitted to the Director contain the following? NA X - 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 ✓				no exception reports have been required
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 ____				

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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
				Part 722				
				GENERATOR STANDARDS				
			A,D, E,G	Subpart E: Special Conditions				
OTH	1			Section 722.150 International Shipments	___	___	✓	no international shipments have been made
			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				

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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
				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 ____			✓	no international shipments have been made
			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.			✓	no international shipments have been made
			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 ✓			✓	not applicable

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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
				- Disposing of pesticide residue on his own farm in a manner consistent with the disposal instructions on the pesticide label? Yes ___ No ___ N/A ✓			✓	not applicable
				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).				

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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 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	✓			
				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 ✓				no changes have been made
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.				

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Area	Cr	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 ___ NA ✓ none of these wastes are managed				none of these wastes are managed

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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	✓			
			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 ✓				no waste is received from off site
			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 ✓				no transfer has occurred
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 ___				

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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 ✓				no waste is recd. from off-site
			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 ✓				no waste is recd. from off-site
			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 ___				
			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 ___				

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Area	C1	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 ___				no waste is rec. from off site

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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 ✓				no waste from off-site
				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 ___				24 hour surveillance is available on site guards on duty at all times.
				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 ___				facility surrounded by security fencing

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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.				

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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 ~~X~~ ___ 2) A threat to human health? Yes ✓ No ___				Inspections are conducted daily
			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 ___				Daily at land application area
			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 ___				
			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:				

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Area	Cx	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 ___				fence was damaged & repaired
			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 ✓				no hazards are imminent
			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 ___ - The name of the inspector? Yes ✓ No ___				

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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 ___				
			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 ___				
				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 ___				

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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 ✓				no salt domes or salt beds formations or underground mines are present on site
				Note: A "Yes" answer is a violation of the location standard.				

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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 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 ___				

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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
			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 ___				2-way radios are available
			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:				weekly
				- 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 ___				

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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: 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:				

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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
			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 ___				
			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 ✓				no refusal has occurred

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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
				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 ✓				no incidents have occurred
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 ___				

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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)	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 ___				coordinator is: plant fire chief who is on duty at the time of the incident
			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 ___				
			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 ___				

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Area	Ci	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 ___				
			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	✓			
				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 ✓				no emergencies have occurred

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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
			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___				
				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 ✓				none have occurred

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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
				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.			✓	-- none have occurred

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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 ✓				none accepted from off-site
				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 ___				

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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
			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 ✓				no waste from off-site
				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				

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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
				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 ___ NA ✓				No off site waste accepted
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 ___				

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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
			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 ✓				no tanks on site for accumulation or storage
				- 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 ✓				no incinerator on site
				- 725.475 (Thermal Treatment) Yes ___ No ___ N/A ✓				no thermal treatment
				- 725.502 (Chem., Phys., Bio. Treatment) Yes ___ No ___ N/A ✓				no chem. phys. or Bio treatment
			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__				

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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	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:				closure not completed
				- The Agency? Yes ___ No ___ N/A ✓				
				- 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 ___				

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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
OTH	1			Section 725.176 Unmanifested Waste Report			✓	no waste is accepted from off-site
				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 ___				

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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	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 ✓				NONE REQUIRED
			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 ✓				

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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
				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 ___				
			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 ✓				interim status not terminated
				- 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 ✓				none issued
CLO	1			Section 725.218 — Post-Closure Plan	✓			
				Is the facility post-closure plan available at the facility? Yes ✓ No ___ N/A ___				

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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
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 ___	✓			

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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				
			A, D, C, E, F, G	Subpart I Use and Management of Container				
OTH	1	X		Section 725.271 Condition of Containers			✓	none on site at time of inspection
				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 ✓				containers all empty at time of inspection
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			✓	
			a)	Are containers of hazardous waste always closed during storage? Yes ___ No ___ NA ✓				

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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
			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 ___ NA ✓				
OTH	2			Section 725.274 Inspections			✓	no container on site at time of inspection
				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			✓	no incompatible
				Is the owner complying with the requirements concerning the management of incompatible wastes or incompatible wastes and materials contained in this Section? Yes ___ No ___ NA ✓				

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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
				Part 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILTIES				impoundment is being closed
			C.E. F.G.	Subpart K: Surface Impoundments				
OTH	1	X		Section 725.321 Design Requirements	✓			
			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 ✓				no new or lateral exp. units are being closed.
				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 ____ n/a ✓				none since 81
			b)	Has the owner or operator notified the Agency, in writing, at least 60 days prior to receiving waste? Yes ____ No ____ n/a ✓				
			b)	Did the owner or operator submit a Part B Permit application within six months of the Agency's receipt of notification? Yes ____ No ✓				not for impoundment

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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	1	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 ✓				never been filled
			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 ____ NA				never been filled
			b)	Is the certification along with a written identification of alternate design features or operating plans preventing overtopping available at the facility? Yes ____ No ____ NA				never been filled - is being closed
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 structural integrity? Yes ✓ No ____ N/A ____				dike was constructed of ~~[illegible]~~ rock with crushed stone on top

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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 725.325 Waste Analysis and Trial Tests	✓			
				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:				impoundment is for storage only
			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	___	___	✓	closure has not been completed (certified)
			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	___	___	✓	no ignitable or reactives

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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
				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:				no ignitable or reactive
			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			✓	no incompatible
				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 ___ N/A				
				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			✓	no waste piles
				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.				

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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
				Part 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES				
			C,E F,G	Subpart M — Land Treatments				
OTH	1	X		Section 725.372 — General Operating Requirements	✓			
			a)	Can the waste being placed in or on the land treatment facility be made less hazardous or non-hazardous by degradation, transformation or immobilization processes occurring in or on the soil? Yes ✓ No ___				
			b)	Has the owner or operator designed, constructed and is he now operating and maintaining a run-on control system capable of preventing flow onto the active portions of the unit during peak discharge from at least a 25-year storm? Yes ✓ No ___				
			c)	Has the owner or operator designed, constructed and is he now operating a run-off management system capable of collecting and controlling a water volume at least equal to a 24-hour, 25-year storm? Yes ✓ No ___				runoff goes to stormwater basin 50,000,000 gallon capacity
			d)	Are collection and holding facilities associated with run-on and runoff control systems being emptied or otherwise managed expiditiously after storms so as to maintain design capacity of the system? Yes ✓ No ___				

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Area	Cr	90 Day F/U	Key Ltr Sub-sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
			e)	Is the owner or operator managing the unit to control wind dispersal if the treatment zone contains particulate matter which may be subject to wind dispersal? Yes ✓ No ___ N/A ___				does not appear to be a problem due to area being surrounded on 3 sides by tree growth
OTH	1			Section 725.373 Waste Analysis	✓	___		
				Prior to placing hazardous waste in or on a land treatment facility has the owner or operator:				
			a)	1) Determined the concentration of any substances which exceed the maximum concentrations contained in Table I of Section 721.124 that cause a waste to exhibit the characteristic of EP toxcicity? Yes ✓ No ___				
			b)	2) Determined the concentration of any substances which caused the waste to be listed as a hazardous waste in Part 721, Subpart D? Yes ✓ No ___				
			c)	3) Determined the concentrations in the waste of arsenic, cadmium lead and mercury, if food chain crops are grown, unless the owner or operator has written, documented data that show that the constitutent is not present? Yes ✓ No ___				no crops are grown

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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	X		Section 725.376 Food Chain Crops			✓	no crops
			a)	Has the owner or operator made the required notice under 725.376(a) if food chain crops are being grown, have been grown or will be grown again on the land treatment facility? Yes ___ No ___				
			b) & c)	Is the owner or operator complying with the requirements of 725.376(b) and (c), concerning the growing of food chain crops on land treatment facilities? Yes ___ No ___				
OTH	1	X		Section 725.378 Unsaturated Zone (Zone of Aeration) Monitoring	✓			
			d)	Does the owner or operator have a written unsaturated zone monitoring plan and is it maintained at the facility? Yes ✓ No ___				
			a)	Has the owner or operator implemented his unsaturated zone monitoring plan? Yes ✓ No ___				
OTH	1			Section 725.379 Record Keeping				
				Is the owner or operator including the date and rate of application of hazardous waste in the operating record? Yes ✓ No ___				none applied since 1981
CLO	1			Section 725.380 Closure and Post-Closure			✓	
				Has the land treatment facility been closed in accordance with an approved closure plan? Yes ___ No ✓				closure not completed

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Area	Cr	90 Day F/U	Key Ltr / Sub-sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
				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 (or independent qualified soil scientist) have certified closure in accordance with an approved closure and post-closure plan.				
OTH	1			Section 725.381 Special Requirements for Ignitable or Reactive Wastes	___	___	✓	no ignitable or reactive waste
			a)	Have ignitable or reactive wastes been land treated by immediately incorporating them into the soil such 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 ___				
			b)	Is the waste managed in such a way that it is protected from any material or conditions which may cause it to ignite or react? Yes ___ No ___ N/A ___				
OTH	1			Section 725.382 Special Requirements for Incompatible Wastes	___	___	✓	no incompatible waste
				Is the owner or operator complying with the requirements concerning the land treatment of incompatible wastes or incompatible wastes and materials contained in this Section? Yes ___ No ___				

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Date: 2-6-87

Time: 2:30 A.M. P.M.

Photograph By:

Jim Wiggins

Location: LPC- 1978030004

Will Co.

Lemont Quarry

Comments: Photograph taken

toward the northwest -

(landfill area #2)

Date: 2-6-87

Time: 2:30 A.M. P.M.

Photograph By:

Jim Wiggins

Location: LPC- 1978030004

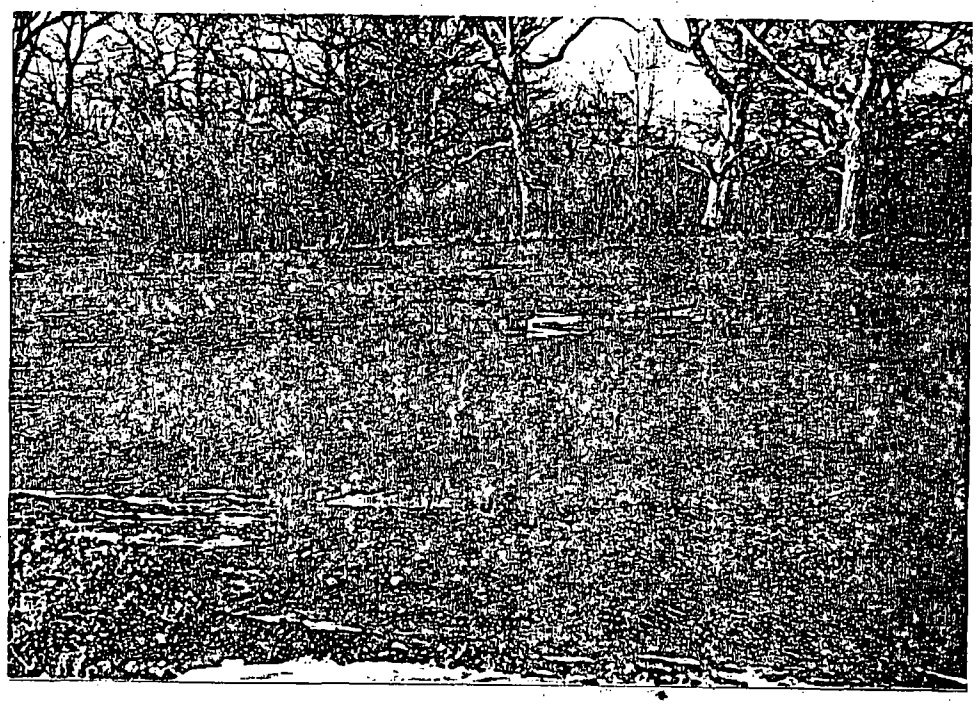
Will Co.

Lemont Quarry

Comments: Photograph taken

toward the north -

(landfill area #2)



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Date: 2-6-87

Time: ~2:30 A.M. ~~P.M.~~

Photograph By:

Jim Wippins

Location: LPC- 1978030004

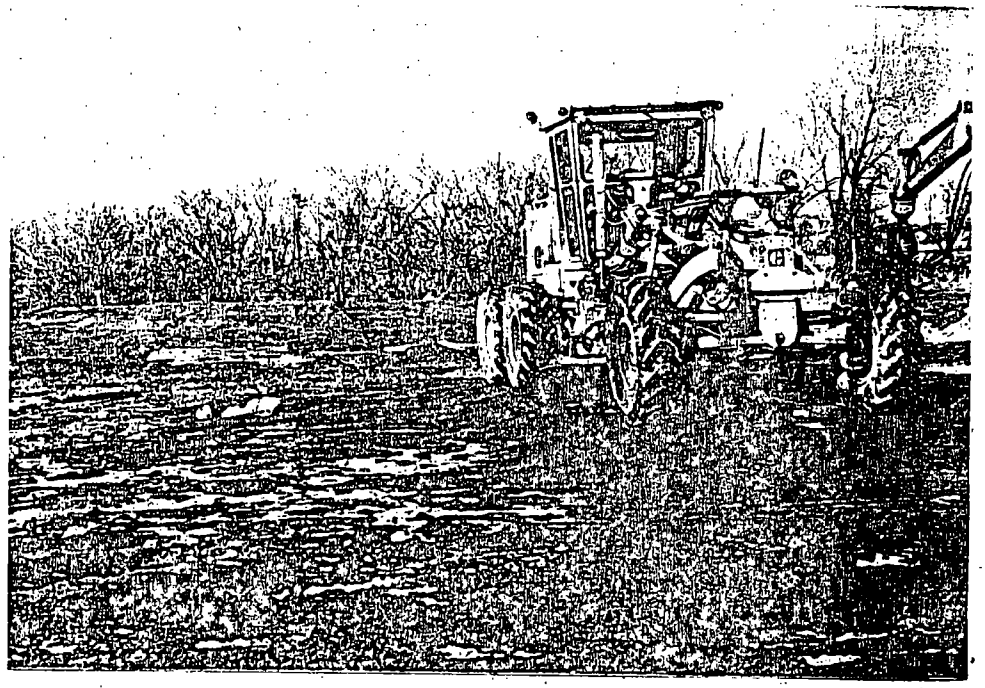
Will Co.

Lemont / Unocal

Comments: Photograph taken

toward the north -

(Landfarm area #1)



Date: 2-6-87

Time: ~2:30 A.M. ~~P.M.~~

Photograph By:

Jim Wippins

Location: LPC- 1978030004

Will Co.

Lemont / Unocal

Comments: Photograph taken

toward the west -

(Landfarm area #1)

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Date: 2-6-87

Time: ≈ 2:30 A.M. P.M.

Photograph By:

Jim Wiggins

Location: LPC- 1978030004

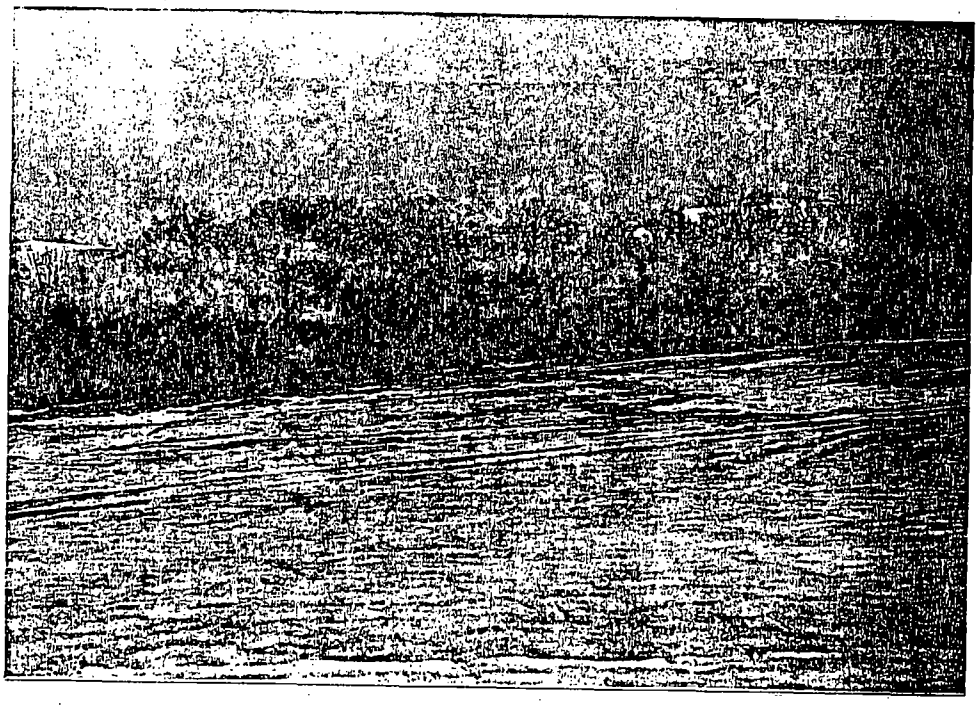
Will Co.

Lemont Disposal

Comments: Photograph taken

toward the north -

(Landfarm area #I)



Date: 2-6-87

Time: ≈ 2:30 A.M. P.M.

Photograph By:

Jim Wiggins

Location: LPC- 1978030004

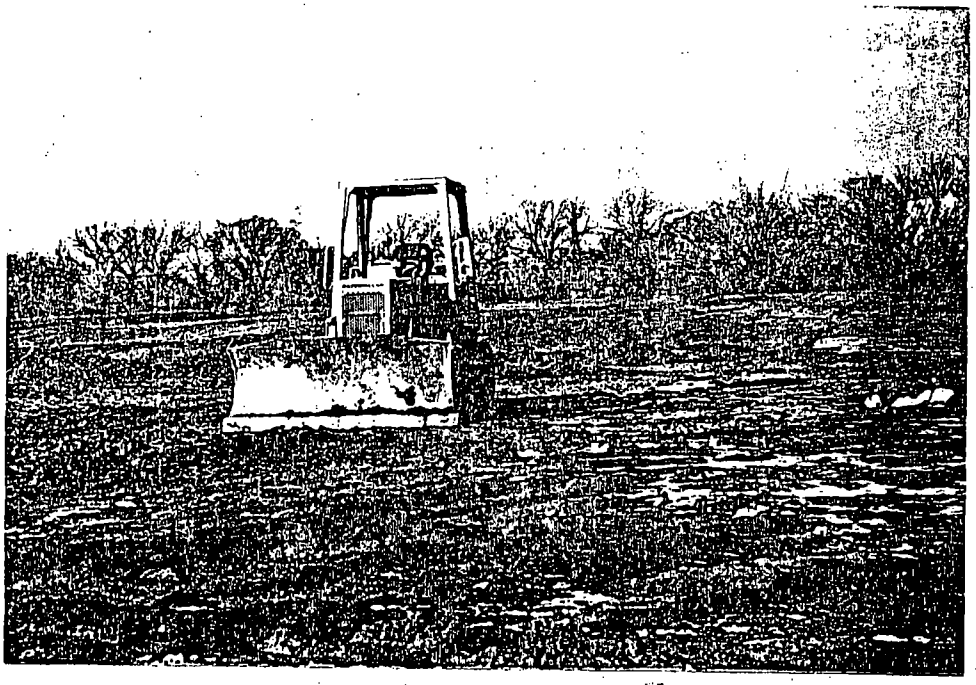
Will Co.

Lemont Disposal

Comments: Photograph taken

toward the north -

(Landfarm area #1)



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Date: 2-6-87

Time: ~2:30 A.M. P.M.

Photograph By:

Jim Wiggins

Location: LPC- 1978030004

Will Co.

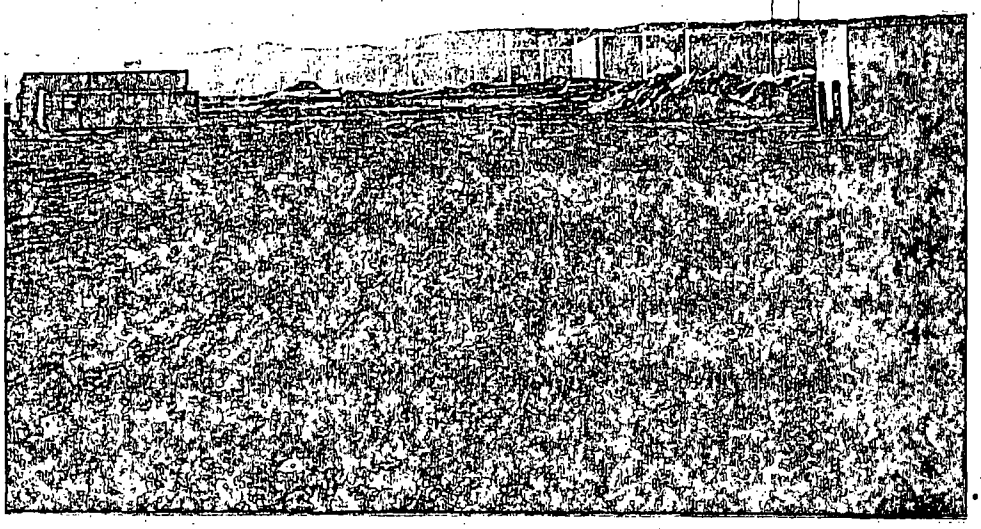
Lemont Disposal

Comments: Photograph taken

toward the west -

(container accumulation

area)



Date: 2-6-87

Time: 2:30 A.M. P.M.

Photograph By:

Jim Wiggins

Location: LPC- 1978030004

Will Co.

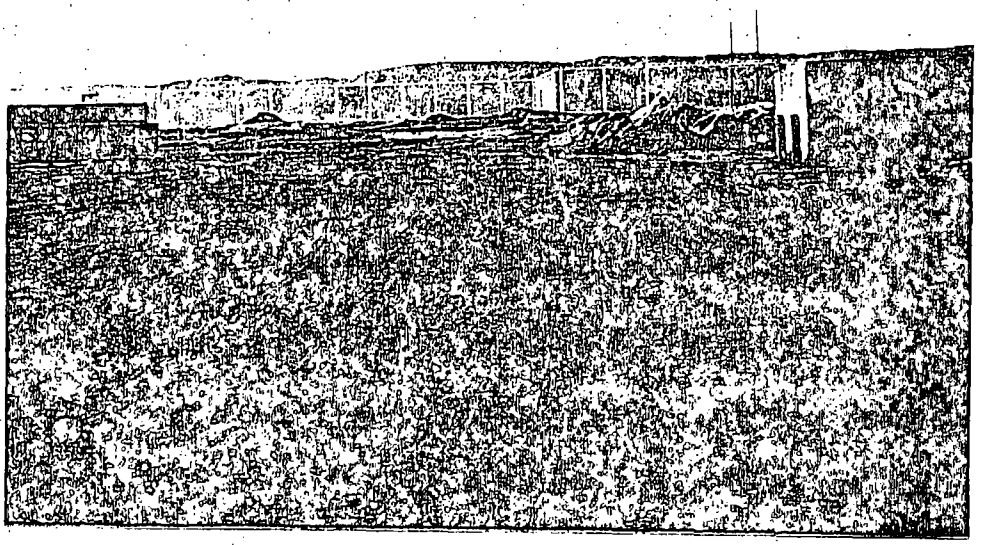
Lemont Disposal

Comments: Photograph taken

toward the west -

(container accumulation

area)



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Date: 2-6-87

Time: 12:30 A.M. P.M.

Photograph By:

Jim Wiggins

Location: LPC- 1978030004

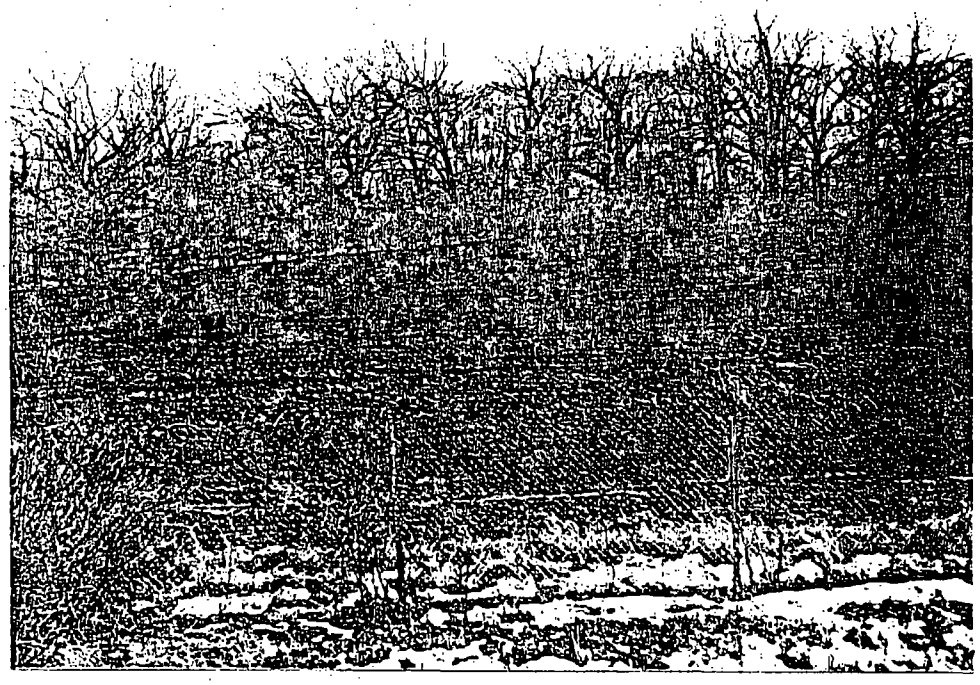
Will Co.

Lemont / Unocal

Comments: Photograph taken

toward the south -

(Landfarm #3)



Date: 2-6-87

Time: 12:30 A.M. P.M.

Photograph By:

Jim Wiggins

Location: LPC- 1978030004

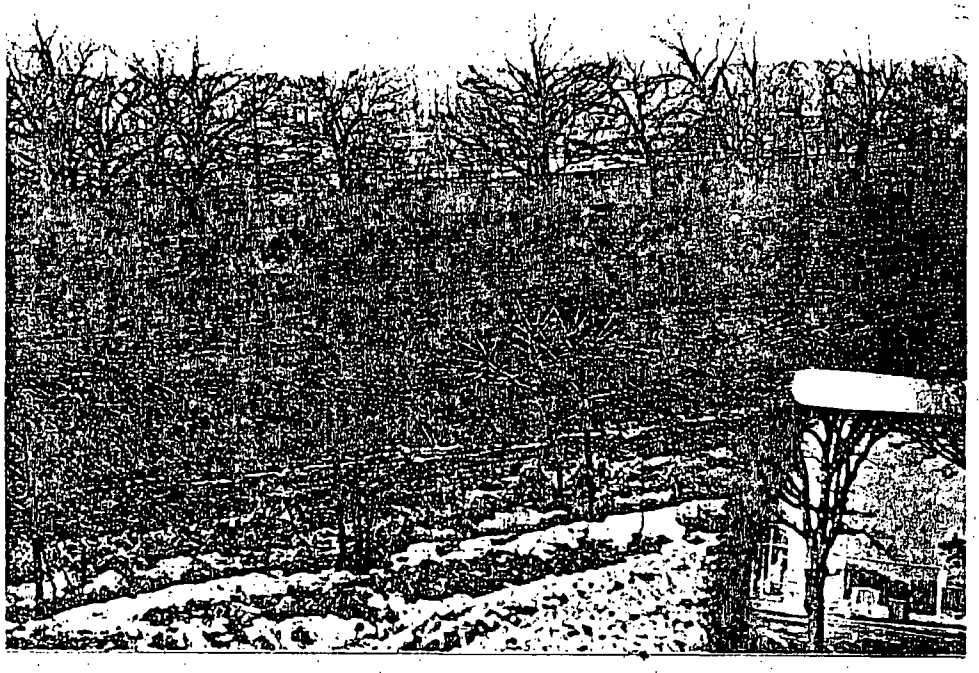
Will Co.

Lemont / Unocal

Comments: Photograph taken

toward the southwest -

(landfarm area #4)



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Date: 2-6-87

Time: 2 2:30 A.M. P.M.

Photograph By:

Jim Wiggins

Location: LPC- 1978030004

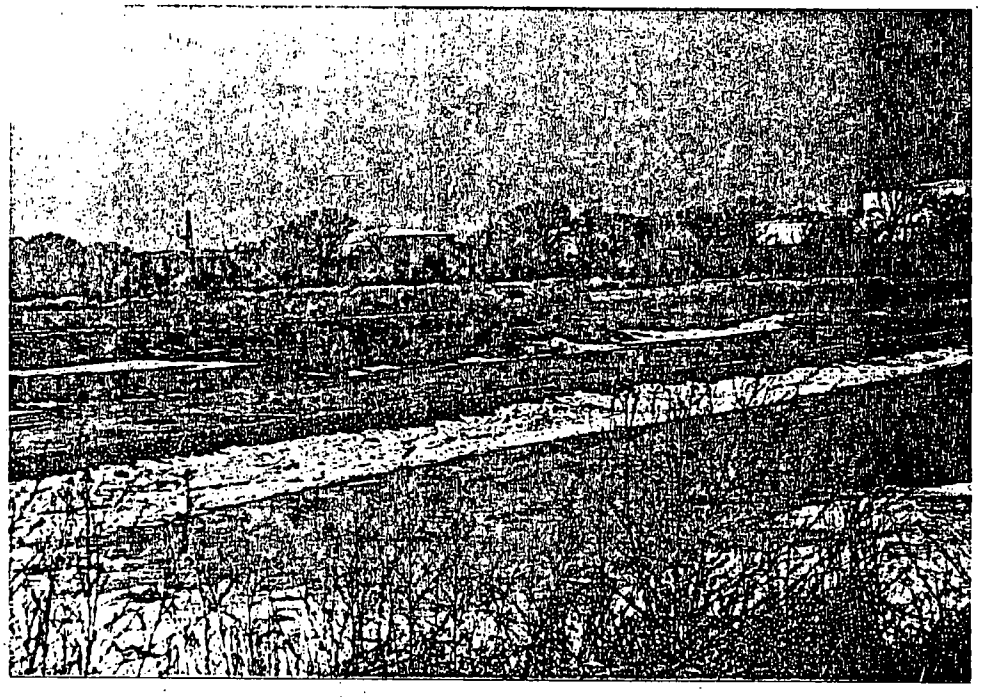
Will Co.

Lemont Unocal

Comments: Photograph taken

toward the northwest -

(surface impoundment)



Date: 2-6-87

Time: 2 2:30 A.M. P.M.

Photograph By:

Jim Wiggins

Location: LPC- 1978030004

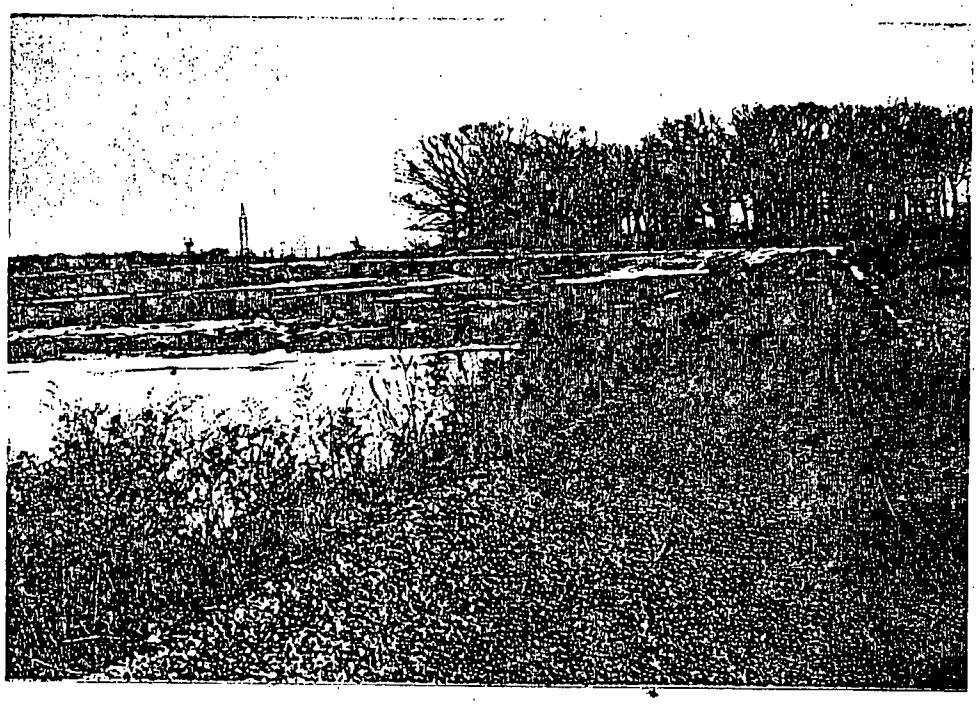
Will Co.

Lemont Unocal

Comments: Photograph taken

toward the southeast -

(surface impoundment)



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Date: 2-6-87

Time: ~2:30 A.M. P.M.

Photograph By:

Jim Wagner

Location: LPC- 1978030004

Will Co.

Lemont / Unocal

Comments: Photograph taken

toward the northwest -

(landfarm area #2)

Date: 2-6-87

Time: ~2:30 A.M. P.M.

Photograph By:

Jim Wagner

Location: LPC- 1978030004

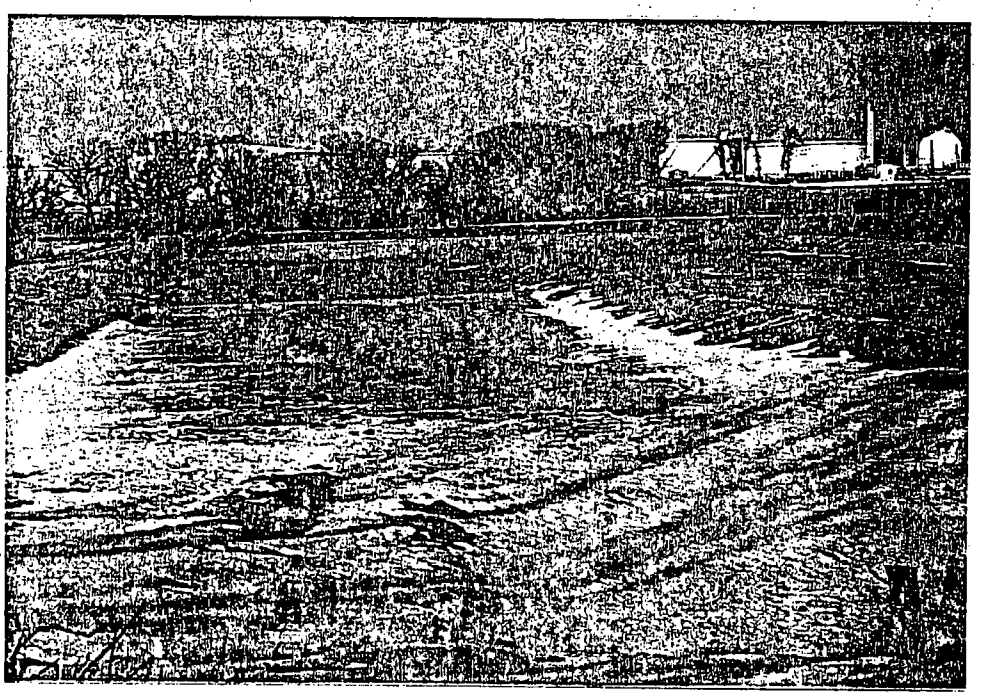
Will Co.

Lemont / Unocal

Comments: Photograph taken

toward the north -

(Surface impoundment)



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APPENDIX A-1

FACILITY INSPECTION FORM FOR COMPLIANCE WITH INTERIM STATUS STANDARDS COVERING GROUNDWATER MONITORING

General Information

USEPA Number: ILD041550567 IEPA Number: 1978030004

Major Facility: (YES)/NO Notified As: G/TSD Regulated As: G/TSD

Facility Name: Union Oil Company

Street: 135th + New Ave.

City: Lemont, State: Illinois Zip Code: 60439

Phone: County: Cook

Facility Contact Official: Leo Erchull Branch/Organization:

Title: Environmental Science Analyst

Region: V Date of Inspection: 6/24/85 Time: (From) 10:00 am (To) 2:30 pm

Type of Inspection: (GWM) RR F/U ___/___/___ (Date of Initial Inspection)

Preparer Information:

Name: Jeannine Balsamo

Agency/Title: IEPA/ EPS I

Telephone: 312/345-9780

Section	Class I	Class II
725.193	✓	
725.190	✓	
725.191	✓	
TOTAL Class I's & II's		

	YES	NO	UNKNOWN	WAVIED
Type of facility: (check appropriately)				
a) surface impoundment	✓			
b) landfill		✓		
c) land treatment facility	✓			
d) disposal waste pile*		✓		
Groundwater Monitoring Program				
1. Was the groundwater monitoring program reviewed prior to site visit?	✓			
if "NO",				
a) Was the groundwater program reviewed at the facility prior to site inspection?				
2. Has a groundwater monitoring program (capable of determining the facility's impact on the quality of groundwater in the uppermost aquifer underlying the facility) been implemented? 725.190(a)		✓		

The program is inadequat well numbers, depths and locations do not ensure prompt detection. These problems will be addressed when the facility returns to detection monitoring.

*Listed separate from landfill for convenience of identification.

IL 532-1344
LPC 195 4/85

	Yes	No	Unknown	Wavied
3. Has at least one monitoring well been installed in the uppermost aquifer hydraulically upgradient from the limit of the waste management area? 725.191(a)(1)	✓			
a) Are ground-water samples from the uppermost aquifer, representative of background ground-water quality and not affected by the facility (as ensured by proper well number, locations and depths?)	✓			
4. Have at least three monitoring wells been installed hydraulically downgradient at the limit of the waste handling or management area? 725.191(a)(2)	✓			
a) Do well numbers, locations and depths ensure prompt detection of any statistically significant amounts of hazardous waste or hazardous waste constituents that migrate from the waste management area to the uppermost aquifer?		✓		
5. Have the locations of the waste management areas been verified to conform with information in the ground-water program?	✓			
a) If the facility contains multiple waste management components, is each component adequately monitored?		N/A		
6. Do the numbers, locations, and depths of the ground-water monitoring wells agree with the data in the ground-water monitoring system program? If "No," explain discrepancies.	✓			
7. Well completion details. 725.191(c)				
a) Are wells properly cased?	✓			
b) Are wells screened (perforated) and packed where necessary to enable sampling at appropriate depths?	✓			
c) Are annular spaces properly sealed to prevent contamination of ground-water?		✓		

	Yes	No	Unknown	Wavied
8. Has a ground-water sampling and analysis plan been developed? 725.192(a)	✓			
a) Has it been followed?	✓			
b) Is the plan kept at the facility:	✓			
c) Does the plan include procedures and techniques for:				
1) Sample collection?	✓			
2) Sample preservation?	✓			
3) Sample shipment?	✓			
4) Analytical procedures?	✓			
5) Chain of custody control?	✓			
9. Are the required parameters in ground-water samples being tested quarterly for the first year? 725.192(b) and 725.192(c)(1)	completed for both deep and shallow wells			
a) Are the ground-water samples analyzed for the following:				
1) Parameters characterizing the suitability of the ground-water as a drinking water supply? 725.192(b)(1)				
2) Parameters establishing ground-water quality? 725.192(b)(2)				
3) Parameters used as indicators of ground-water contamination? 725.192(b)(3)				
(i) For each indicator parameter are at least four replicate measurements obtained at each upgradient well for each sample obtained during the first year of monitoring? 725.192(c)(2)				
(ii) Are provisions made to calculate the initial background arithmetic mean and variance of the respective parameter concentrations or values obtained from the upgradient well(s) during the first year? 725.192(c)(2)	✓			

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	Yes	No	Unknown	Wavied
b) For facilities which have completed first year ground-water sampling and analysis requirements:				
1) Have samples been obtained and analyzed for the ground-water quality parameters at least annually? 725.192(d)(1)	✓			
2) Have samples been obtained and analyzed for the indicators of ground-water contamination at least semi-annually? 725.192(d)(2)	✓			
c) Were ground-water surface elevations determined at each monitoring well each time a sample was taken? 725.192(e)	✓			
d) If it was determined that modification of the number, location or depth of monitoring wells was necessary, was the system brought into compliance with 725.191(a)? 725.193		N/A		
10. Has an outline of a ground-water quality assessment program been prepared? 725.193(a)	✓			
a) Does it describe a program capable of determining:				
1) Whether hazardous waste or hazardous waste constituents have entered the ground-water?	✓			
2) The rate and extent of migration of hazardous waste or hazardous waste constituents in ground-water?		✓		
3) Concentrations of hazardous waste or hazardous waste constituents in ground-water?		✓		
b) Were records kept of the analyses and evaluations, specified in the ground-water quality assessment (throughout the active life of the facility)? 725.194(b)(1)	✓			
1) If a disposal facility, were(are) records kept through the post-closure period as well?		N/A		

APPENDIX A-2

COMPLIANCE FORM FOR A FACILITY WHICH MAY BE AFFECTING GROUND-WATER QUALITY

Company Name: Union Oil Company ; IEPA I.D. Number: 1978030004

Company Address: 135th & New Ave ; USEPA I.D. Number: ILD041550607

Lemont, IL 60439 Inspector's Name: Jeannine Balsamo

Company Contact/Official: Leo Erchull ; Branch/Organization:

Title: Environmental Science Analyst ; Date of Inspection: 6-24-85

	Yes	No	Unknown
Type of facility: (check appropriately)			
a) surface impoundment	✓		
b) landfill		✓	
c) land treatment facility	✓		
d) disposal waste pile		✓	
1. Have comparisons of ground-water contamination indicator parameters for the upgradient well(s) 725.193(b) shown a significant increase (or pH decrease as well) over initial background?	✓		
a) If "Yes," has this information been submitted to the Director according to 725.194(a)(2)(ii)?	✓		
2. Have comparisons of indicator parameters for the downgradient wells 725.193(b) shown a significant increase (or pH decrease as well) over initial background?	✓		
a) If "Yes," were additional ground-water samples taken for those downgradient wells where the significant difference was determined? 725.193(c)(2)	✓		
1) Were samples split in two?	✓		
2) Was the significant difference due to human (e.g., laboratory) error? (If "Yes," do not continue.)		✓	

	Yes	No	Unknown	Wavied
11. Have records been kept of analyses for parameters in 725.192(c) and (d)? 725.194(a)(1)	✓			
12. Have records been kept of ground-water surface elevations taken at the time of sampling for each well? 725.194(a)(1)	✓			
13. Have records been kept of required elevations in 725.192(e)? 725.194(a)(1)	✓			

*EPA will be proposing (Spring 1982) to replace this reporting requirement with an exception reporting system where reports will be submitted only where maximum contaminant levels or significant changes in the contamination indicators or other parameters are observed. EPA has delayed compliance stage for 14 a) above until August 1, 1982 (Federal Register, February 23, 1982, p. 7841-7842) to be coupled with exception reporting in the interim.

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APPENDIX A-2

COMPLIANCE FORM FOR A FACILITY WHICH MAY BE AFFECTING GROUND-WATER QUALITY

Company Name: Union Oil Company ; IEPA I.D. Number: 1978030004

Company Address: 135th & New Ave ; USEPA I.D. Number: ILD041550677

Lemont, IL 60439 Inspector's Name: Jeannine Balsamo

Company Contact/Official: Leo Erchull ; Branch/Organization:

Title: Environmental Science Analyst ; Date of Inspection: 6-24-85

	Yes	No	Unknown
Type of facility: (check appropriately)			
a) surface impoundment	✓		
b) landfill		✓	
c) land treatment facility	✓		
d) disposal waste pile		✓	
1. Have comparisons of ground-water contamination indicator parameters for the upgradient well(s) 725.193(b) shown a significant increase (or pH decrease as well) over initial background?	✓		
a) If "Yes," has this information been submitted to the Director according to 725.194(a)(2)(ii)?	✓		
2. Have comparisons of indicator parameters for the downgradient wells 725.193(b) shown a significant increase (or pH decrease as well) over initial background?	✓		
a) If "Yes," were additional ground-water samples taken for those downgradient wells where the significant difference was determined? 725.193(c)(2)	✓		
1) Were samples split in two?	✓		
2) Was the significant difference due to human (e.g., laboratory) error? (If "Yes," do not continue.)		✓	

	Yes	No	Unknown
3. If significant differences were not due to error, was a written notice sent to the Director within 7 days of confirmation?	✓		
4. Within 15 days of notification of the Director was a certified ground-water quality assessment plan submitted? 725.193(d)(2)	✓		
a) Does the plan specify 725.193(d)(3):			
1) well information (specifics):			
(a) number?		✓	
(b) locations?		✓	
(c) depths?		✓	
2) sampling methods?		✓	
3) analytical methods?		✓	
4) evaluation methods?		✓	
5) schedule of implementation?		✓	
b) Does the plan allow for determination of 725.193(d)(4):			
1) Rate and extent of migration of hazardous waste or hazardous waste constituents?		✓	
2) Concentrations of the hazardous waste or hazardous waste constituents?		✓	
c) Is it indicated that the first determination was made as soon as technically feasible? 725.193(d)(5)	No determinations have been made as yet.		
1) Within 15 days after the first determination was a written report containing the assessment of ground-water quality submitted to the Director?			
d) Was it determined that hazardous waste or hazardous waste constituents from the facility have entered the ground-water?	Not determined as yet		
1) If "No," was the original indicator evaluation program, required by 725.192 and 725.193(b), reinstated?			

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	Yes	No	Unknown
(a) Was the Director notified of the reinstatement of program within 15 days of the determination? 725.193(d)(6)	___	___	
e) If it was determined that hazardous waste or hazardous waste constituents have entered the ground-water 725.193(d)(7):			
1) For facilities where a program was implemented prior to final closure, are determinations of hazardous waste or hazardous waste constituents continued on a quarterly basis? (If a program was implemented during the post-closure care period, determinations made in accordance with the ground-water quality assessment plan may cease after the first determination.)	___	___	
(a) Were subsequent ground-water quality reports submitted to the Director within 15 days of determination?	___	___	
f) Are annual reports submitted to the Director containing the results of the ground-water quality assessment program? 725.194(b)(2)	___	___	
1) Do the reports include the calculated or measured rate of migration of hazardous waste or hazardous waste constituents during the reporting period?	___	___	

APPENDIX -B

GROUND-WATER MONITORING AND ALTERNATE SYSTEM
TECHNICAL INFORMATION FORM

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APPENDIX B

GROUND-WATER MONITORING AND ALTERNATE SYSTEM
TECHNICAL INFORMATION FORM

1.0 Background Data:

Company Name: Union Oil Company ; EPA I.D.#: 1978030004

Company Address: 135th & New Ave
Lemont, IL 60439

Inspector's Name: Jeanine Balsamo ; Date: 6-24-85

1.1 Type of facility (check appropriately):

1.1.1 surface impoundment ✓
1.1.2 landfill
1.1.3 land treatment facility ✓
1.1.4 disposal waste pile

1.2 Has a ground-water monitoring system been established? (Y/N) Y

1.2.1 Is a ground-water quality assessment program outlined or proposed? (Y/N) Y

If Yes,

1.2.2 Was it reviewed prior to the site visit? (Y/N) Y

1.3 Has a ground-water quality assessment program been implemented or proposed at the site? (Y/N) Y

If yes, Appendix C, Ground-Water Quality Assessment Program Technical Information Form must be utilized also.

2.0 Regional/Facility Map(s)

2.1 Is a regional map of the area, with the facility delineated, included? (Y/N) Y

If yes,

2.1.1 What is the origin and scale of the map? USGS 1:24 000

2.1.2 Is the surficial geology adequately illustrated? (Y/N) Y

2.1.3 Are there any significant topographic or surficial features evident? (Y/N) Y

If yes, describe An intermittent stream passes through the waste management area between two land farm plots

2.1.4 Are there any streams, rivers, lakes, or wet lands near the facility? (Y/N) Y

If yes, indicate approximate distances from the facility Illinois - Michigan Canal is approximately 4,000 feet from the land farm area

2.1.5 Are there any discharging or recharging wells near the facility? (Y/N) Y

If yes, indicate approximate distances from the facility. 700', 1300' and 1800' from the waste management area

2.2 Is a regional hydrogeologic map of the area included? (This information may be shown on 2.1) (Y/N) N

If yes:

2.2.1 Are major areas of recharge/dishcarge shown? (Y/N) ___

If yes, describe. ___

2.2.2 Is the regional ground-water flow direction indicated? (Y/N) ___

2.2.3 Are the potentiometric contours logical? (Y/N) ___
If not, explain. ___

2.3 Is a facility plot plan included? (Y/N) Y

2.3.1 Are facility components (landfill areas, impoundments, etc.) shown? (Y/N) Y

2.3.2 Are any seeps, springs, streams, ponds, or wetlands indicated? (Y/N) Y

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2.3.3 Are the locations of any monitoring wells, soil borings, or test pits shown? (Y/N) Y

2.3.4 Is the facility a multi-component facility? (Y/N) N/

If yes:

2.3.4.1 Are individual components adequately monitored? (Y/N) _____

2.3.4.2 Is a Waste Management Area delineated? (Y/N) _____

2.4 Is a site water table (potentiometric) contour map included? (Y/N) Y

If yes,

2.4.1 Do the potentiometric contours appear logical based on topography and presented data? (Consult water level data) (Y/N) Y

2.4.2 Are groundwater flowlines indicated? (Y/N) Y

2.4.3 Are static water levels shown? (Y/N) Y

2.2.4 May hydraulic gradients be estimated? (Y/N) Y

2.4.5 Is at least one monitoring well located hydraulically upgradient of the waste management area(s)? (Y/N) Y

2.4.6 Are at least three monitoring wells located hydraulically downgradient of the waste management area(s)? (Y/N) Y

2.4.7 By their location, do the upgradient wells appear capable of providing representative ambient groundwater quality data? (Y/N) Y

If no, explain. _____

INFORMATION TABLE B-1

BORING NO.	DEPTH	DIAMETER
See 1984	inspection	report

3.5.2 At what interval were samples collected? 5 foot intervals

3.5.3 Were the deposits or rock units penetrated described? (boring logs, etc.) (Y/N) Y

3.6 If test pits were excavated at the site, describe procedures.

4.0 Well Completion Detail

4.1 Were the wells installed under the supervision of a qualified professional? (Y/N) Y

If yes:

4.1.1 Indicate the individual and affiliation, if known Glenn W Hmon Converse / Teneck and Todd Gates, TM Gates Inc

4.1.2 Indicate the well construction contractor, if known D & G Drilling and Canonie Construction Co.

4.2 List the number of wells at the site

4.2.1 Pre-existing 1

4.2.2 For RCRA Compliance 15

6 deep wells
3 supplimental deep wells
6 supplimental shallow wells

4.3 Well construction information (fill out INFORMATION TABLE B-2) See 8-16-84 inspection report

4.3.1 If PVC well screen or casing is used, are joints (couplings):

- Glued on ✓
- Screwed on ✓

Newer wells (MW 7, 8, 9 and all SW series) have screwed on joints

4.3.2 Are well screens sand/gravel packed? (Y/N) Y

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INFORMATION TABLE B-2

	WELL NO.						
	GROUND ELEVATION						
	TOTAL DEPTH						
WELL CASING	TYPE MATERIAL						
	DIAMETER						
	LENGTH						
	STICK-UP						
	TOP ELEVATION						
	BOTTOM ELEVATION						
WELL SCREEN	DEPTH TOP/BOTTOM						
	TYPE MATERIAL						
	DIAMETER						
	LENGTH						
	SLOT SIZE						
	TOP ELEVATION						
	BOTTOM ELEVATION						
OPEN HOLE OR SAND/GRAVEL PACK	DEPTH TOP/BOTTOM						
	DIAMETER						
	LENGTH						
	TOP ELEVATION						
	BOTTOM ELEVATION						

4.3.3 Are annular spaces sealed? (Y/N) Y

If yes, describe:

- bentonite slurry ____
- Cement grout ____
- Other (explain) ____

- Thicknesses of seals The old wells have 3' of bentonite pellets above sand pack then clay backfill to 3 feet below ground surface then cement to surface. The new wells have 1 foot bentonite seals, clay backfill and 2' cement surface seals.

4.3.4 If "open hole" wells, are the cased portions sealed in place? (Y/N) ____

If yes, describe how: N/A

4.3.5 Are there cement surface seals? (Y/N) Y

If yes,

- How thick? 2 and 3 feet seals

4.3.6 Are the wells capped? (Y/N) Y

If yes,

- Do they lock? (Y/N) Y wells outside fence are locked

4.3.7 Are protective standpipes cemented in place? (Y/N) N some need replacing

4.3.8 Were wells developed? (Y/N) Y

If yes, check appropriate method(s):

- Air lift pumping ____
- Pumping and surging ____
- Jetting ____
- Bailing ____
- Other (explain) ____

5.0 Aquifer Characterization

5.1 Has the extent of the uppermost saturated zone (aquifer) in the facility area been defined? (Y/N) Y

If yes,

5.1.1 Are soil boring/test pit logs included? (Y/N) Y

5.1.2 Are geologic cross-sections included? (Y/N) Y

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5.2 Is there evidence of confining (low permeability) layers beneath the site? (Y/N) Y

If yes,

5.2.1 Is the areal extent and continuity indicated? (Y/N) ON-SITE ONLY

5.2.2 Is there any potential for saturated conditions (perched water) to occur above the uppermost aquifer? (Y/N) Y

If yes, give details: _____

a) Should or is this perched zone being monitored? (Y/N) Y

Explain Six wells have been established to monitor the perched zones

5.2.3 What is the lithology and texture of the uppermost saturated zone (aquifer)? silty sand in the perched zones, dolomite in the uppermost aquifer

5.2.4 What is the saturated thickness, if indicated? _____

5.3 Were static water levels measured? (Y/N) Y

If yes,

5.3.1 How were the water levels measured (check method(s)).

- Electric water sounder ✓
- Wetted tape ____
- Air line ____
- Other (explain) ____

5.3.2 Do fluctuations in static water levels occur? (Y/N) Y

If yes,

5.3.2.1 Are they accounted for (e.g. seasonal, tidal, etc.)? (Y/N) Y

If yes, describe: seasonal

6.0 Well Performance

6.1 Are the monitoring wells screened in the uppermost aquifer? (Y/N) Y

6.1.1 Is the full saturated thickness screened? (Y/N) N

6.1.2 For single completions, are the intake areas in the: (check appropriate levels)

- Upper portion of the aquifer ____
- Middle of the aquifer ____
- Lower portion of the aquifer ____

See cross-sections: wells are screened throughout the till. Some extend slightly into the dolomite

6.1.3 For well clusters, are the intake areas open to different portions of the aquifer? (Y/N) N/A

6.1.4 Do the intake levels of the monitoring wells appear to be justified due to possible contaminant density and groundwater flow velocity? (Y/N) ____

7.0 Ground-Water Quality Sampling

7.1 Is a sampling (groundwater quality) program and schedule included? (Y/N) Y

7.2 Are sample collection field procedures clearly outlined? (Y/N) Y

7.2.1 How are samples obtained: (check method(s))

- Air lift pump ____
- Submersible pump ____
- Positive displacement pump ____
- Centrifugal pump ____
- Peristaltic or other suction-lift pump ____
- Bailer ✓
- Other (describe) ____

7.2.2 Are all wells sampled with the same equipment and procedures? (Y/N) Y

If no, explain ____

7.2.3 Are adequate provisions included to clean equipment after sampling to prevent cross-contamination between wells? (Y/N) Y

7.2.4 Are organic constituents to be sampled? (Y/N) TOC TOX

If yes,

7.2.4.1 Are samples collected with equipment to minimize absorption and volatilization? (Y/N) Y

If yes,

Describe equipment PVC bailer

8.0 Sample Preservation and Handling

8.1 Have appropriate sample preservation and preparation procedures been followed (filtration and preservation where appropriate)? (Y/N) Y

8.2 Are samples refrigerated? (Y/N) Y

8.3 Are EPA recommended sample holding period requirements adhered to? (Y/N) Y

8.4 Are suitable container types used? (Y/N) Y

8.5 Are provisions made to store and ship samples under cold conditions (ice packs, etc.)? (Y/N) Y

8.6 Is a chain of custody control procedure clearly defined? (Y/N) Y

8.7 Is a specific chain of custody form illustrated? (Y/N) Y

If yes,

8.7.1 Will this form provide an accurate record of sample possession from the moment the sample is taken until the time it is analyzed? (Y/N) Y

9.0 Sample Analysis and Record Keeping

9.1 Is sample analysis performed by a qualified laboratory? (Y/N) Y

Indicate lab ETC of Edison, NJ and Varian O.I. Brea Research Ctr., Brea, California

9.2 Are analytical methods described in the records? (Y/N) Y

9.2.1 Are analytical methods acceptable to EPA? (Y/N) Y

9.3 Are the required drinking water suitability parametters tested for? (Y/N) Y

9.4 Are the required groundwater quality parameters tested for? (Y/N) Y

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9.5 Are the required groundwater contamination indicator parameters tested for? (Y/N) Y

9.6 Are any analytical parameters determined in the field? (Y/N) Y

Identify:

- pH ✓
- Temperature
- Specific conductance ✓
- Other (describe) _____

_____

9.7 Is a plan included to record information about each sample collected during the groundwater monitoring program? (Y/N) Y

9.7.1 Are field activity logs included? (Y/N) Y

9.7.2 Are laboratory results included? (Y/N) Y

9.7.3 Are field procedures recorded? (Y/N) Y

9.7.4 Are field parameter determinations included? (Y/N) Y

9.7.5 Are the names and affiliation of the field personnel included? (Y/N) Y

9.8 Are statistical analyses planned or shown for all water quality results where necessary? (Y/N) Y

9.8.1 Is an analysis program set-up which adheres to EPA guidelines? (Y/N) Y

9.8.2 Is Student's t-test utilized? (Y/N) Y
If other evaluation procedure used, identify _____

_____

9.8.3 Are provisions made for submitting analysis reports to the Regional Administrator? (Y/N) Y

10.0 Site Verification

10.1 Plot Plan indicating the locations of various facility components, ground-water monitoring wells, and surface waters? (Y/N Y)

10.1.1 Is the plot plan used for the inspection the same as in the monitoring program plan documentation? (Y/N) Y

If not, explain _____

_____

10.1.2 Are all of the components of the facility identified during the inspection addressed in the monitoring program documentation? (Y/N) Y

If not, explain _____

10.1.3 Are there any streams, lakes or wetlands on or adjacent to the site? (Y/N) Y

If yes, indicate distances from waste management areas An intermittant stream flows through the waste management area between two land farming areas

10.1.4 Are there any signs of water quality degradation evident in the surface water bodies? (Y/N) N/

If yes, explain _____

10.1.5 Is there any indication of distressed or dead vegetation on or adjacent to the site? (Y/N) N/

If yes, explain _____

10.1.6 Are there any significant topographic or surficial features on or near the site (e.g., recharge or discharge areas)? (Y/N) Y

If yes, explain the intermittant stream

10.1.7 Are the monitor well locations and numbers in agreement with the monitoring program documentation? (Y/N) Y

If no, explain _____

10.1.7.1 Were locations and elevations of the monitor wells surveyed into some known datum? (Y/N) Y

If not, explain _____

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10.1.7.2 Were the wells sounded to determine total depth below the surface? (Y/N) Y

If not, explain (shallow wells only)

10.1.7.3 Were discrepancies in total depth greater than two feet apparent in any well? (Y/N) Y

If yes, explain

10.1.8 Was ground water encountered in all monitoring wells? (Y/N) N

If not, indicate which well(s) were dry SW7 was dry

SW4 - dry

10.1.9 Were water level elevations measured during the site visit? (Y/N) Y

If yes, indicate well number and water level elevation

See attached sheet

If not, explain

	Stick-Up	Depth to Water	Total Depth	Water Elevation	Bottom Elevation	Difference in Total Depth from original borings
SW1 (GT01)	3.26	3.07	23.79	713.92	693.2	.7 ✓
SW4 (GT04)	2.17	54.22	55.90	641.40	639.5	.9 ✓
SW5 (GT05)	1.83	15.30	34.04	668.16	649.42	1.48 ✓
SW7 (GT07)	2.34	26.37	26.54	673.78	673.62	21.22 ✓
SW8 (GT08)	2.02	27.39	30.83	641.21	637.77	.63 ✓
SW9 (GT09)	1.81	12.39	34.72	711.24	688.91	.71 ✓

- Depth to water measured with designated bailer.

SW - Details

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APPENDIX - C

GROUND-WATER QUALITY ASSESSMENT PROGRAM
INFORMATION FORM

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APPENDIX C

GROUND-WATER QUALITY ASSESSMENT PROGRAM
INFORMATION FORM

Company Name: Union Oil Company ; EPA I.D.#: 1978030004
Company Address: 135th & New Ave. ILD041550567
Lemont, IL 60439

Inspector's Name: Jeannine Balsamo ; Date: 6-24-85

1.0 Background

1.1 List the constituents (contaminants) originating from the waste management area: (use separate sheet if necessary The presence of constituents has not yet been determined

1.2 Have the concentrations of the hazardous waste or hazardous waste constituents shown significant increases in:

- upgradient monitoring wells (Y/N) Y
- downgradient monitoring wells (Y/N) Y

1.2.1 List or indicate on a map, the wells which have shown significant increases: (use separate sheet if necessary) G101: pH increase; G102: Se and pH increase; G104: pH increase; G106: pH increase, TOC increase; G103: pH increase

1.3 Were the significant increases in contaminant concentration determined through the use of the student's t-Test? (Y/N) Y

If no,

1.3.1 Explain procedure used

1.4 Has the possibility of error (e.g., laboratory) been eliminated? (Y/N) Y

1.4.1 Explain The wells were resampled and analyzed in March 1984 to confirm the November 1983 results.

2.0 Contaminant Characteristics

2.1 If available, list the chemical and physical properties of the contaminants which have been detected in the ground water: (density, solubility, etc.). Include on a separate sheet if list is extensive Not determined as yet

3.0 Implementation of the Assessment Program

3.1 Has the extent of the migration of hazardous waste or hazardous waste constituents been determined? (Y/N) N

If yes,

3.1.1 Indicate how: (check appropriate method(s))

- additional ground-water monitoring wells
- geophysical methods
- computer simulation
- other, explain

3.2 Were monitoring wells installed? (Y/N) N

If yes, No new wells were installed for assessment

3.2.1 Record monitoring well/peizometer completion data on INFORMATION TABLE C-1.

3.2.2 Were well clusters (nests) used or were wells with multiple intake areas constructed? Give details

3.2.3 Show the numbers and locations of the additional wells/peizometers on a site map.

3.2.4 Are the locations of the wells/piezometers justified in view of the water table or potentiometric surface map? (Y/N)
Give details

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INFORMATION TABLE C-1

	WELL NO.						
	GROUND ELEVATION						
	TOTAL DEPTH						
WELL CASING	TYPE MATERIAL						
	DIAMETER						
	LENGTH						
	STICK-UP						
	TOP ELEVATION						
	BOTTOM ELEVATION						
WELL SCREEN	DEPTH TOP/BOTTOM						
	TYPE MATERIAL						
	DIAMETER						
	LENGTH						
	SLOT SIZE						
	TOP ELEVATION						
	BOTTOM ELEVATION						
OPEN HOLE OR SAND/GRAVEL PACK	DEPTH TOP/BOTTOM						
	DIAMETER						
	LENGTH						
	TOP ELEVATION						
	BOTTOM ELEVATION						

3.2.5 Are the depths of the monitoring wells/ piezometers justified due to the relative characteristics (e.g., densities) of the contaminants? (Y/N) _____
Give details _____

_____

_____

3.2.6 List any other methods (e.g., soil sample analysis) used to document the extent of the contamination. (use separate sheet if necessary) _____

_____

_____

3.3 Has the rate of contaminant migration been determined? (Y/N) _____

If yes, what is it and how was it determined? _____

_____

_____

3.3.1 Does the rate of migration differ for various contaminants? (Y/N) _____
Give details _____

_____

_____

3.3.2 If known, what is the cause (reason) of (for) this differential in migration rates? _____

_____

_____

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APPENDIX A-1

FACILITY INSPECTION FORM FOR COMPLIANCE WITH INTERIM STATUS STANDARDS COVERING GROUNDWATER MONITORING

General Information

USEPA Number: ILD041550567 IEPA Number: 1978030004

Major Facility: YES/NO Notified As: G/TSD Regulated As: G/TSD

Facility Name: Union Oil Company

Street: 135th & New Avenue

City: Lemont State: Illinois Zip Code: 60439

Phone: 312/257-7761 County: Will

Facility Contact Official: Leo Erchull Branch/Organization:

Title: Environmental Science Analyst

Region: 1 Date of Inspection: 5/16/86 Time: (From) 10:00 am (To) 2:00 pm

Type of Inspection: GWM RR F/U ___/___/___ (Date of Initial Inspection)

Preparer Information:

Name: Jeannine Balsamo

Agency/Title: IEPA/EPS

Telephone: 312/345-9780

Section	Class I	Class II
725.190(a) and (b)	1	
725.191(a)(1)	1	
725.191(a)(2)		
725.191(c)		
TOTAL Class I's & II's	2	

Type of facility: (check appropriately)

	YES	NO	UNKNOWN	WAVIED
a) surface impoundment (sludge drying bed)	X			
b) landfill		X		
c) land treatment facility	X			
d) disposal waste pile*		X		

Groundwater Monitoring Program

	YES	NO	UNKNOWN	WAVIED
1. Was the groundwater monitoring program reviewed prior to site visit? if "NO",	X			
a) Was the groundwater program reviewed at the facility prior to site inspection?		X		
2. Has a groundwater monitoring program (capable of determining the facility's impact on the quality of groundwater in the uppermost aquifer underlying the facility) been implemented? 725.190(a)		X		

*Listed separate from landfill for convenience of identification.

cc. Northern Region Compliance Monitoring
Union Oil

IL 532-1344
LPC 195 4/85

	Yes	No	Unknown	Waived
3. Has at least one monitoring well been installed in the uppermost aquifer hydraulically upgradient from the limit of the waste management area? 725.191(a)(1)	X		upgradient wells: MW1 MW2 MW9	
a) Are ground-water samples from the uppermost aquifer, representative of background ground-water quality and not affected by the facility (as ensured by proper well number, locations and depths?)		X		
4. Have at least three monitoring wells been installed hydraulically downgradient at the limit of the waste handling or management area? 725.191(a)(2)	X		downgradient wells: MW4 MW7 MW8 MW5	
a) Do well numbers, locations and depths ensure prompt detection of any statistically significant amounts of hazardous waste or hazardous waste constituents that migrate from the waste management area to the uppermost aquifer?		X		
5. Have the locations of the waste management areas been verified to conform with information in the ground-water program?	X			
a) If the facility contains multiple waste management components, is each component adequately monitored?	N/A	all components are managed together		
6. Do the numbers, locations, and depths of the ground-water monitoring wells agree with the data in the ground-water monitoring system program? If "No," explain discrepancies.		X	SW7 - 20.41' shallower SW4 - 4.62' deeper than when originally installed.	
7. Well completion details. 725.191(c)				
a) Are wells properly cased?	X			
b) Are wells screened (perforated) and packed where necessary to enable sampling at appropriate depths?		X		
c) Are annular spaces properly sealed to prevent contamination of ground-water?		X		

	Yes	No	Unknown	Wavied
8. Has a ground-water sampling and analysis plan been developed? 725.192(a)	X			
a) Has it been followed?	X			
b) Is the plan kept at the facility:	X			
c) Does the plan include procedures and techniques for:				
1) Sample collection?	X			
2) Sample preservation?	X			
3) Sample shipment?	X			
4) Analytical procedures?	X			
5) Chain of custody control?	X			
9. Are the required parameters in ground-water samples being tested quarterly for the first year? 725.192(b) and 725.192(c)(1)	X			
a) Are the ground-water samples analyzed for the following:				
1) Parameters characterizing the suitability of the ground-water as a drinking water supply? 725.192(b)(1)				
2) Parameters establishing ground-water quality? 725.192(b)(2)				
3) Parameters used as indicators of ground-water contamination? 725.192(b)(3)				
(i) For each indicator parameter are at least four replicate measurements obtained at each upgradient well for each sample obtained during the first year of monitoring? 725.192(c)(2)				
(ii) Are provisions made to calculate the initial background arithmetic mean and variance of the respective parameter concentrations or values obtained from the upgradient well(s) during the first year? 725.192(c)(2)				

	Yes	No	Unknown	Waived
b) For facilities which have completed first year ground-water sampling and analysis requirements:				
1) Have samples been obtained and analyzed for the ground-water quality parameters at least annually? 725.192(d)(1)	X			
2) Have samples been obtained and analyzed for the indicators of ground-water contamination at least semi-annually? 725.192(d)(2)	X			
c) Were ground-water surface elevations determined at each monitoring well each time a sample was taken? 725.192(e)	X			
d) If it was determined that modification of the number, location or depth of monitoring wells was necessary, was the system brought into compliance with 725.191(a)? 725.193		X Well SW7 is still over 20 feet shallower than when originally installed		
10. Has an outline of a ground-water quality assessment program been prepared? 725.193(a)	X			
a) Does it describe a program capable of determining:				
1) Whether hazardous waste or hazardous waste constituents have entered the ground-water?				
2) The rate and extent of migration of hazardous waste or hazardous waste constituents in ground-water?				
3) Concentrations of hazardous waste or hazardous waste constituents in ground-water?				
b) Were records kept of the analyses and evaluations, specified in the ground-water quality assessment (throughout the active life of the facility)? 725.194(b)(1)	X			
1) If a disposal facility, were(are) records kept through the post-closure period as well?	N/A			

	Yes	No	Unknown	Wavied
11. Have records been kept of analyses for parameters in 725.192(c) and (d)? 725.194(a)(1)	X			
12. Have records been kept of ground-water surface elevations taken at the time of sampling for each well? 725.194(a)(1)	X			
13. Have records been kept of required elevations in 725.192(e)? 725.194(a)(1)	X			

*EPA will be proposing (Spring 1982) to replace this reporting requirement with an exception reporting system where reports will be submitted only where maximum contaminant levels or significant changes in the contamination indicators or other parameters are observed. EPA has delayed compliance stage for 14 a) above until August 1, 1982 (Federal Register, February 23, 1982, p. 7841-7842) to be coupled with exception reporting in the interim.

APPENDIX B

GROUND-WATER MONITORING AND ALTERNATE SYSTEM TECHNICAL INFORMATION FORM

1.0 Background Data:

Company Name: Union Oil Company ; EPA I.D.#: 1978030004

Company Address: 135th & New Ave.
Lemont, Illinois
60439

Inspector's Name: Jeannine Balsamo ; Date: 5-16-86

1.1 Type of facility (check appropriately):

1.1.1 surface impoundment x (sludge drying beds)
1.1.2 landfill ___
1.1.3 land treatment facility x
1.1.4 disposal waste pile ___

1.2 Has a ground-water monitoring system been established? (Y/N) Y

1.2.1 Is a ground-water quality assessment program outlined or proposed? (Y/N) Y

If Yes,

1.2.2 Was it reviewed prior to the site visit? (Y/N) Y

1.3 Has a ground-water quality assessment program been implemented or proposed at the site? (Y/N) N Facility just returned to detection monitoring

If yes, Appendix C, Ground-Water Quality Assessment Program Technical Information Form must be utilized also.

2.0 Regional/Facility Map(s)

2.1 Is a regional map of the area, with the facility delineated, included? (Y/N) Y

If yes,

2.1.1 What is the origin and scale of the map? USGS 1:24000

2.1.2 Is the surficial geology adequately illustrated? (Y/N) Y

2.1.3 Are there any significant topographic or surficial features evident? (Y/N) Y

If yes, describe an intermittant stream passes through the waste management area between two land farm plots

2.1.4 Are there any streams, rivers, lakes, or wet lands near the facility? (Y/N) Y

If yes, indicate approximate distances from the facility Illinois-Michigan Canal is approximately 4,000 feet from the land farm area

2.1.5 Are there any discharging or recharging wells near the facility? (Y/N) Y

If yes, indicate approximate distances from the facility. 700', 1300', and 1800' from the waste management area

2.2 Is a regional hydrogeologic map of the area included? (This information may be shown on 2.1) (Y/N) N

If yes:

2.2.1 Are major areas of recharge/dishcarge shown? (Y/N) ___

If yes, describe. ___

2.2.2 Is the regional ground-water flow direction indicated? (Y/N) ___

2.2.3 Are the potentiometric contours logical? (Y/N) ___
If not, explain. ___

2.3 Is a facility plot plan included? (Y/N) Y

2.3.1 Are facility components (landfill areas, impoundments, etc.) shown? (Y/N) Y

2.3.2 Are any seeps, springs, streams, ponds, or wetlands indicated? (Y/N) Y

2.3.3 Are the locations of any monitoring wells, soil borings, or test pits shown? (Y/N) Y

2.3.4 Is the facility a multi-component facility? (Y/N) N

If yes:

2.3.4.1 Are individual components adequately monitored? (Y/N) _____

2.3.4.2 Is a Waste Management Area delineated? (Y/N) _____

2.4 Is a site water table (potentiometric) contour map included? (Y/N) Y

If yes,

2.4.1 Do the potentiometric contours appear logical based on topography and presented data? (Consult water level data) (Y/N) Y

2.4.2 Are groundwater flowlines indicated? (Y/N) Y

2.4.3 Are static water levels shown? (Y/N) Y

2.2.4 May hydraulic gradients be estimated? (Y/N) Y

2.4.5 Is at least one monitoring well located hydraulically upgradient of the waste management area(s)? (Y/N) Y

2.4.6 Are at least three monitoring wells located hydraulically downgradient of the waste management area(s)? (Y/N) Y

2.4.7 By their location, do the upgradient wells appear capable of providing representative ambient groundwater quality data? (Y/N) Y

If no, explain._____

_____

_____

3.0 Soil Boring/Test Pit Details

3.1 Were soil borings/test pits made under the supervision of a qualified professional? (Y/N) Y

If yes,

3.1.1 Indicate the individual(s) and affiliation(s): Glenn Wilhman - hydrologist for Converse/Tenech Consultants, and Todd Gates - geologist for TM Gates, Inc.

3.1.2 Indicate the drilling/excavating contractor, if known D & G Drilling and Canonie Construction Co.

3.2 If soil borings/test pits were made, indicate the method(s) of drilling/excavating:

- Auger (hollow or solid stem) ____
- Mud rotary x
- Air rotary ____
- Reverse rotary ____
- Cable tool ____
- Jetting ____
- Other, including excavation (explain) ____

3.3 List the number of soil borings/test pits made at the site

3.3.1 Pre-existing 1

3.3.2 For RCRA compliance 14

3.4 Indicate borehole diameters and depths (if different diameters and depths use TABLE B-1).

3.4.1 Diameter: See August 1981 Converse/Tenech report

3.4.2 Depth: and June 4, 1984 report from T.M. Gates

3.5 Were lithologic samples collected during drilling? (Y/N) Y

If yes,

3.5.1 How were samples obtained? (Check method(s))

- Split spoon x
- Shelby tube, or similar ____
- Rock coring ____
- Ditch sampling ____
- Other (explain) ____

6.0 Well Performance

6.1 Are the monitoring wells screened in the uppermost aquifer? (Y/N) N

6.1.1 Is the full saturated thickness screened? (Y/N) N

6.1.2 For single completions, are the intake areas in the: (check appropriate levels) A few of the wells extend into the dolomite.

- Upper portion of the aquifer None adequately ____
- Middle of the aquifer monitor this ____
- Lower portion of the aquifer aquifer. ____

6.1.3 For well clusters, are the intake areas open to different portions of the aquifer? (Y/N) N/A

6.1.4 Do the intake levels of the monitoring wells appear to be justified due to possible contaminant density and groundwater flow velocity? (Y/N) N

7.0 Ground-Water Quality Sampling

7.1 Is a sampling (groundwater quality) program and schedule included? (Y/N) Y

7.2 Are sample collection field procedures clearly outlined? (Y/N) Y

7.2.1 How are samples obtained: (check method(s))

- Air lift pump ____
- Submersible pump ____
- Positive displacement pump ____
- Centrifugal pump ____
- Peristaltic or other suction-lift pump ____
- Bailer x (dedicated pvc)
- Other (describe) ____

7.2.2 Are all wells sampled with the same equipment and procedures? (Y/N) Y

If no, explain ____

7.2.3 Are adequate provisions included to clean equipment after sampling to prevent cross-contamination between wells? (Y/N) Y

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

If yes,

5.3.2.3 Will the effectiveness of the wells to detect contaminants be reduced? (Y/N) _____

Explain _____

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

If yes, explain _____

5.4 Have aquifer hydraulic properties been determined? (Y/N) Y

If yes,

5.4.1 Indicate method(s):

- Pumping tests _____
- Falling/constant head tests X on MW1 only
- Laboratory tests (explain) _____

5.4.2 If determined, what are the values for:

- Transmissivity _____
- Storage coefficient _____
- Leakage _____
- Permeability X 10^{-5} cm/sec
- Porosity _____
- Specific capacity _____

5.4.3 In cases where several tests were undertaken, were discrepancies in the results evident? (Y/N) N/A

If yes, explain _____

5.4.4 Were horizontal ground-water flow velocities determined? (Y/N) Y

If yes, indicate rate of movement 1.5×10^{-3} ft/day (from MW1 to MW2)

5.2 Is there evidence of confining (low permeability) layers beneath the site? (Y/N) Y

If yes,

5.2.1 Is the areal extent and continuity indicated? (Y/N) N

5.2.2 Is there any potential for saturated conditions (perched water) to occur above the uppermost aquifer? (Y/N) Y

If yes, give details: localized perched zones that are not hydraulically connected consisting of clayey silt and sand

a) Should or is this perched zone being monitored? (Y/N) Y

Explain Six shallow wells have been installed to monitor the perched zones

5.2.3 What is the lithology and texture of the uppermost saturated zone (aquifer)? the dolomite is the uppermost aquifer

5.2.4 What is the saturated thickness, if indicated? _____

5.3 Were static water levels measured? (Y/N) Y

If yes,

5.3.1 How were the water levels measured (check method(s)).

- Electric water sounder X
- Wetted tape ____
- Air line ____
- Other (explain) ____

5.3.2 Do fluctuations in static water levels occur? (Y/N) Y

If yes,

5.3.2.1 Are they accounted for (e.g. seasonal, tidal, etc.)? (Y/N) Y

If yes, describe: seasonal

INFORMATION TABLE B-2

	WELL NO.	SW7	SW8	SW9			
	GROUND ELEVATION	699.4	667.4	723.2			
	TOTAL DEPTH	47.0	29.0	34.0			
WELL CASING	TYPE MATERIAL	PVC	PVC	PVC			
	DIAMETER	2"	2"	2"			
	LENGTH	29.53	11.32	15.87			
	STICK-UP	2.53	2.32	1.87			
	TOP ELEVATION	701.93	669.72	725.07			
	BOTTOM ELEVATION	672.4	658.4	709.2			
WELL SCREEN	DEPTH TOP/BOTTOM	27.0 / 47.0	9.0 / 29.0	14.0 / 34.0	/	/	/
	TYPE MATERIAL	PVC	PVC	PVC			
	DIAMETER	2"	2"	2"			
	LENGTH	20.0'	20.0'	20.0'			
	SLOT SIZE	.006"	.006"	.006"			
	TOP ELEVATION	672.40	658.40	709.20			
	BOTTOM ELEVATION	652.40	638.40	689.20			
OPEN HOLE OR SAND/GRAVEL PACK	DEPTH TOP/BOTTOM	24.0 / 67.0	7.0 / 27.0	12.0 / 34.0	/	/	/
	DIAMETER	6"	6"	6"			
	LENGTH	43.0	22.0	22.0			
	TOP ELEVATION	675.4	660.4	711.2			
	BOTTOM ELEVATION	632.4	638.4	689.2			

INFORMATION TABLE B-2

	WELL NO.	MW7	MW8	MW9	SW1	SW4	SW5
	GROUND ELEVATION	699.5	668.0	723.0	715.50	693.40	682.90
	TOTAL DEPTH	97.3	57.5	108.5	23.0	53.5	32.0
WELL CASING	TYPE MATERIAL	PVC	PVC	PVC	PVC	PVC	PVC
	DIAMETER	2"	2"	2"	2"	2"	2"
	LENGTH	79.72	39.91	90.90	5.81	36.03	14.62
	STICK-UP	2.42	2.41	2.40	2.81	2.53	2.62
	TOP ELEVATION	701.92	670.41	725.40	718.31	695.93	685.52
	BOTTOM ELEVATION	622.20	630.50	634.50	712.50	659.90	670.90
WELL SCREEN	DEPTH TOP/BOTTOM	77.3 / 97.3	37.5 / 57.5	88.5 / 108.5	3.0 / 23.0	33.5 / 53.5	12.0 / 32.0
	TYPE MATERIAL	PVC	PVC	PVC	PVC	PVC	PVC
	DIAMETER	2"	2"	2"	2"	2"	2"
	LENGTH	20.0'	20.0'	20.0'	20.0'	20.0'	20.0'
	SLOT SIZE	.006"	.006"	.006"	.006"	.006"	.006"
	TOP ELEVATION	622.2	630.5	634.5	712.50	659.90	670.90
	BOTTOM ELEVATION	602.2	610.5	614.5	692.50	639.90	650.90
OPEN HOLE OR SAND/GRAVEL PACK	DEPTH TOP/BOTTOM	75.5 / 97.3	30.0 / 57.5	85 / 108.5	2.5 / 23	15.0 / 53.5	10.0 / 32.0
	DIAMETER	6"	6"	6"	6"	6"	6"
	LENGTH	21.8	27.5	23.5	20.5	38.5	22.0
	TOP ELEVATION	624.0	638.0	638.0	713.0	678.40	672.9
	BOTTOM ELEVATION	602.2	610.5	614.5	692.5	639.9	650.9

INFORMATION TABLE B-2

	WELL NO.	MW-1	MW2	MW3	MW4	MW5	MW6
	GROUND ELEVATION	715.0	719.3	704.0	692.8	683.2	696.8
	TOTAL DEPTH (from ground surface)	108.75	110.0	100.0	78.8	88.0	90.0
WELL CASING	TYPE MATERIAL	PVC	PVC	PVC	PVC	PVC	PVC
	DIAMETER	4"	4"	4"	4"	4"	4"
	LENGTH	91.55	92.6	82.3	50.1	70.2	71.4
	STICK-UP	2.8	2.6	2.3	1.6	2.2	1.4
	TOP ELEVATION	717.80	721.9	706.3	694.4	685.4	698.2
	BOTTOM ELEVATION	626.25	629.3	624.0	644.3	615.2	626.8
WELL SCREEN	DEPTH TOP/BOTTOM	88.75 / 108.75	90.0 / 110.0	80.0 / 100.0	48.5 / 78.5	68.0 / 88.0	70.0 / 90.0
	TYPE MATERIAL	PVC	PVC	PVC	PVC	PVC	PVC
	DIAMETER	4"	4"	4"	4"	4"	4"
	LENGTH	20.0'	20.0'	20.0'	20.0'	20.0'	20.0'
	SLOT SIZE	.006"	.006"	.006"	.006"	.006"	.006"
	TOP ELEVATION	626.25	629.3	624.0	644.3	615.2	626.8
	BOTTOM ELEVATION	606.25	609.3	604.0	614.0	595.2	606.8
OPEN HOLE OR SAND/GRAVEL PACK	DEPTH TOP/BOTTOM	63.5 / 111.5	78 / 116.5	56.25 / 101.5	35.0 / 78.8	46.0 / 88.0	42.5 / 91.5
	DIAMETER	8"	8"	8"	8"	8"	8"
	LENGTH	48	38.5	45.25	43.8	42.0	49
	TOP ELEVATION	651.5	641.3	647.75	657.8	637.2	654.3
	BOTTOM ELEVATION	603.5	602.8	602.50	614	595.2	605.3

4.3.3 Are annular spaces sealed? (Y/N) Y

If yes, describe: - construction of the wells is inadequate. See memo for details.

- bentonite slurry ____
- Cement grout ____
- Other (explain) ____

The older wells have 3' bentonite pellets above the sand pack and clay backfill to the surface seals. The new wells have

- Thicknesses of seals 1' bentonite seals and clay backfill to the surface seals.

4.3.4 If "open hole" wells, are the cased portions sealed in place? (Y/N) N/A

If yes, describe how: ____

4.3.5 Are there cement surface seals? (Y/N) Y

If yes,

- How thick? older wells: 3', newer wells: 2'

4.3.6 Are the wells capped? (Y/N) Y

If yes,

- Do they lock? (wells MW1, SW1, MW9 and SW9 have locks) (Y/N) N

4.3.7 Are protective standpipes cemented in place? (Y/N) N (Not all wells have standpipes)

4.3.8 Were wells developed? (Y/N) Y

If yes, check appropriate method(s):

- Air lift pumping ____
- Pumping and surging ____
- Jetting ____
- Bailing X
- Other (explain) ____

5.0 Aquifer Characterization

5.1 Has the extent of the uppermost saturated zone (aquifer) in the facility area been defined? (Y/N) Y

If yes,

5.1.1 Are soil boring/test pit logs included? (Y/N) Y

5.1.2 Are geologic cross-sections included? (Y/N) Y

3.5.2 At what interval were samples collected? 5' intervals

3.5.3 Were the deposits or rock units penetrated described? (boring logs, etc.) (Y/N) Y

3.6 If test pits were excavated at the site, describe procedures. N/A

4.0 Well Completion Detail

4.1 Were the wells installed under the supervision of a qualified professional? (Y/N) Y

If yes:

4.1.1 Indicate the individual and affiliation, if known Glenn Wittman - Converse/Tenech and Todd Gates - T.M. Gates, Inc.

4.1.2 Indicate the well construction contractor, if known D & G Drilling and Comenie Construction Co.

4.2 List the number of wells at the site

4.2.1 Pre-existing 1

4.2.2 For RCRA Compliance 14

4.3 Well construction information (fill out INFORMATION TABLE B-2)

4.3.1 If PVC well screen or casing is used, are joints (couplings):

- Glued on X (Wells MW1, MW2, MW3 MW4, MW5 and MW6)
- Screwed on X all others

4.3.2 Are well screens sand/gravel packed? (Y/N) Y

7.2.4 Are organic constituents to be sampled? (Y/N) TOC TOX

If yes,

7.2.4.1 Are samples collected with equipment to minimize absorption and volatilization? (Y/N) Y

If yes,

Describe equipment pvc bailer

8.0 Sample Preservation and Handling

8.1 Have appropriate sample preservation and preparation procedures been followed (filtration and preservation where appropriate)? (Y/N) Y

8.2 Are samples refrigerated? (Y/N) ___

8.3 Are EPA recommended sample holding period requirements adhered to? (Y/N) ___

8.4 Are suitable container types used? (Y/N) ___

8.5 Are provisions made to store and ship samples under cold conditions (ice packs, etc.)? (Y/N) ___

8.6 Is a chain of custody control procedure clearly defined? (Y/N) ___

8.7 Is a specific chain of custody form illustrated? (Y/N) ___

If yes,

8.7.1 Will this form provide an accurate record of sample possession from the moment the sample is taken until the time it is analyzed? (Y/N) ___

9.0 Sample Analysis and Record Keeping

9.1 Is sample analysis performed by a qualified laboratory? (Y/N) Y

Indicate lab Gulf Coast Labs

9.2 Are analytical methods described in the records? (Y/N) ___

9.2.1 Are analytical methods acceptable to EPA? (Y/N) ___

9.3 Are the required drinking water suitability parametters tested for? (Y/N) ___

9.4 Are the required groundwater quality parameters tested for? (Y/N) ___

9.5 Are the required groundwater contamination indicator parameters tested for? (Y/N) Y

9.6 Are any analytical parameters determined in the field? (Y/N) Y

Identify:

- pH X
- Temperature
- Specific conductance X
- Other (describe) _____

9.7 Is a plan included to record information about each sample collected during the groundwater monitoring program? (Y/N) Y

9.7.1 Are field activity logs included? (Y/N) _____

9.7.2 Are laboratory results included? (Y/N) _____

9.7.3 Are field procedures recorded? (Y/N) _____

9.7.4 Are field parameter determinations included? (Y/N) _____

9.7.5 Are the names and affiliation of the field personnel included? (Y/N) _____

9.8 Are statistical analyses planned or shown for all water quality results where necessary? (Y/N) Y

9.8.1 Is an analysis program set-up which adheres to EPA guidelines? (Y/N) _____

9.8.2 Is Student's t-test utilized? (Y/N) _____
If other evaluation procedure used, identify _____

9.8.3 Are provisions made for submitting analysis reports to the Regional Administrator? (Y/N) _____

10.0 Site Verification

10.1 Plot Plan indicating the locations of various facility components, ground-water monitoring wells, and surface waters? (Y/N Y)

10.1.1 Is the plot plan used for the inspection the same as in the monitoring program plan documentation? (Y/N) Y

If not, explain _____

10.1.2 Are all of the components of the facility identified during the inspection addressed in the monitoring program documentation? (Y/N) Y

If not, explain _____

10.1.3 Are there any streams, lakes or wetlands on or adjacent to the site? (Y/N) Y

If yes, indicate distances from waste management areas An intermittent stream flows through the waste management area between two land farming areas

10.1.4 Are there any signs of water quality degradation evident in the surface water bodies? (Y/N) N

If yes, explain _____

10.1.5 Is there any indication of distressed or dead vegetation on or adjacent to the site? (Y/N) N

If yes, explain _____

10.1.6 Are there any significant topographic or surficial features on or near the site (e.g., recharge or discharge areas)? (Y/N) Y

If yes, explain the stream

10.1.7 Are the monitor well locations and numbers in agreement with the monitoring program documentation? (Y/N) Y

If no, explain _____

10.1.7.1 Were locations and elevations of the monitor wells surveyed into some known datum? (Y/N) Y

If not, explain _____

10.1.7.2 Were the wells sounded to determine total depth below the surface? (Y/N) Y

If not, explain only shallow wells, Slope Indicator is only 100 feet

10.1.7.3 Were discrepancies in total depth greater than two feet apparent in any well? (Y/N) Y

If yes, explain SW7 - 20.41 feet shallower, SW4 - 4.62 feet deeper

10.1.8 Was ground water encountered in all monitoring wells? (Y/N) Y

If not, indicate which well(s) were dry _____

10.1.9 Were water level elevations measured during the site visit? (Y/N) Y

If yes, indicate well number and water level elevation _____

See attached.

If not, explain _____

Well	Stick-up PVC	Depth to water from ground surface	Total Depth from ground surface	Groundwater Elevation	Bottom Elevation	Difference in total depth from original borings	Comments
MW1	2.56'	42.89		619.55			locked cap
MW2	1.98'	97.1		620.32			repaired last fall, plastic from well or Slope Indicator. Total depth may be different than originally
MW3	1.79'	81.84		620.38			No protective standpipe
MW4	.83'	71.15		620.52			No protective standpipe
MW5	.85'	63.73		618.62			No protective standpipe
MW6	.92'	74.33		623.55			No protective standpipe
MW7	1.77'	82.23		615.5			
MW8	1.97	46.51		619.52			
MW9	1.13'		water level > 100' could not measure				locked cap
SW1	.73'	3.6'	22.98	711.17	691.79	-.71	locked cap
SW4	1.92'	26.67	56.21	664.81	635.28	+4.62	
SW5	.65'	12.45	33.34	669.8	648.91	-1.89	
SW7	.73'	25.45'	25.86	673.25	672.81	-20.41	almost always dry
SW8	wasp	nest in	well,	could not	measure		
SW9	.44'	7.88	34.27	714.98	688.59	-.61	locked cap - needs new surface seal

- slope Indicator is only 100' long, thus total depth could only be measured for shallow wells
- all have dedicated bailers

Union Oil

Top of Casing Elevation

Date _____

Well			
MW - 1	717.65	SW - 1	718.70
MW - 2	~~722.09~~ 721.79		
MW - 3	706.49		
MW - 4	694.43	SW - 4	696.41
MW - 5	685.50	SW - 5	685.67
MW - 6	698.20		
MW - 7	706.18	SW - 7	706.00
MW - 8	670.80	SW - 8	670.79
MW - 9	725.60	SW - 9	725.25

JEP/mes

Well	Stick-up PVC	Depth to water from ground surface	Total Depth from ground surface	Groundwater Elevation	Bottom Elevation	Difference in total depth from original borings	Comments
MW1	2.56'	42.89		619.55			locked cap
MW2	1.98'	97.1		620.32			repaired last fall, plastic from well w/ Slope Indicator. Total depth may be different than originally
MW3	1.79'	81.84		620.38			No protective standpipe
MW4	.83'	71.15		620.52			No protective standpipe
MW5	.85'	63.73		618.62			No protective standpipe
MW6	.42'	74.33		623.55			No protective standpipe
MW7	1.77'	52.23		615.5			
MW8	1.97	46.51		619.52			
MW9	1.13'		water level > 100' could not measure				locked cap
SW1	.73'	3.6'	22.98	711.17	691.79	-.71	locked cap
SW4	1.92'	26.67	56.21	664.81	635.28	+4.62	
SW5	.65'	12.45'	33.34	669.8	648.91	-1.99	
SW7	.73'	25.45'	25.86	673.25	672.81	-20.41	almost always dry
SW8	wasp	nest in	well,	could not	measure		
SW9	.44'	7.88	34.27	714.98	688.59	-.61	locked cap - Needs new curbcase seal

- slope Indicator is only 100' long, thus total depth could only be measured for shallow wells
- all have dedicated bailers

LETTER #5

Unocal Refining & Marketing Division
Unocal Corporation
Chicago Refinery
Lemont, Illinois 60439
Telephone (312) 257-7761

ENV 151-86

UNOCAL 76

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
#P 399 353 637

A.J. Eliskains
Manager, Chicago Refinery
Eastern Region

July 15, 1986

Mr. Bur Filson
Compliance Monitoring Section
Division of Land Pollution
Control
Illinois Environmental Protection
Agency
2200 Churchill Road
Springfield, Illinois 62706

Dear Mr. Filson:

Meeting Date Change
Groundwater Monitoring
Facility: ILD 41550567

We have received your pre-enforcement conference letter dated June 25, 1987, and would like to confirm our meeting in Springfield on August 12, 1986 at 10:00 a.m. Although we agree to the meeting and believe a discussion of Unocal's groundwater monitoring program will be beneficial, we question the need to threaten enforcement action. Please bear in mind the following correspondence:

1. The IEPA August 5, 1985 compliance inquiry letter states:

   "The Agency's findings in Attachment C (now referenced as Attachment A to IEPA pre-enforcement conference letter dated

June 26, 1986) are based upon an inspection of your facility on June 2, 1985 and a file review of your current groundwater monitoring program with respect to the requirements of "detection monitoring" under Subpart F. These findings need only be addressed and corrected if or when your facility returns to detection monitoring via Section 725.193(d)(6). A written response to these apparent violations will be required within 30 days of your facility returning to detection monitoring via Section 725.193(d)(6)."

2. The IEPA May 6, 1986 letter to Unocal which states:

"The Agency has reviewed your Phase II Groundwater Assessment Report dated March 27, 1986. After reviewing the report it has been determined that Union Oil will return to Detection Monitoring."

3. Unocal's May 23, 1986 letter which states:

"It is expected that detection monitoring data will be collected and submitted to the agency during the summer of 1986.

Following the submission of this data, Unocal will respond within 30 days to Attachment C (now referenced as Attachment A to IEPA pre-enforcement conference letter dated June 26, 1986) of the agency's compliance inquire letter of August 8, 1985."

Considering the above correspondence, Unocal believes we are not now, nor have we ever been delinquent in responding to the IEPA's requests. Therefore, we believe there is no basis for enforcement action, and the threat of enforcement action is unwarranted.

It should be noted that Unocal is committed to continued cooperation with the IEPA, and we believe the scheduled August 12, 1986 meeting will assist Unocal to determine what improvement(s), if any, will be necessary for our existing groundwater monitoring system. We would prefer however that the August 12 meeting be held not to discuss enforcement action, but rather to discuss and hopefully resolve technical concerns and alleged violations pertaining to our existing groundwater monitoring system.

Additionally, Unocal believes discussions about groundwater monitoring are pertinent to Chicago Refinery's pending Part B permit application. It is requested that representatives from the agency's RCRA permit section attend the meeting, also.

Very truly yours,

D. W. Bruckert

D. W. Bruckert, Supervisor
Environmental Services

DWB:rm

cc: Larry Eastep, IEPA

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

I. General Information

USEPA Number: ILD041550567 IEPA Number: 1978030004

Major Facility: (YES)/NO Notified As: Gen, Stor, Disp Regulated As: Gen, Sto, Disp

(A) Facility Name: Union Oil Company – Chicago Refinery

(B) Street: 135th Street and New Ave.

(C) City: Lemont (D) State: Ill. (E) Zip Code: 60439

(F) Phone: 312/2577761 (G) County: Will

(H) Operator: Union Oil Company of California

(I) Street: 135th Street and New Ave.

(J) City: Lemont (K) State: Ill. (L) Zip Code: 60439

(M) Phone: 312/2577761 (N) County: Will

(O) Owner: Union Oil Company of California

(P) Street: 135th Street and New Ave.

(Q) City: Lemont (R) State: Ill. (S) Zip Code: 60439

(T) Phone: 312/2577761 (U) County: Will

Region: N (V) Date of Inspection: 12/12/85 (W) Time: (From) 1:00pm (To) 2:30pm

Type of Inspection: (ISS) RECORD REVIEW SAMPLING CITIZEN COMPLAINT

CLOSED WITHDRAWAL OTHER PART B

F/U ___/___/___ (Date of Initial Inspection)

(X) Weather Conditions: ≤ 30°F - partly sunny

Area	Section	Class I	Class II

TOTAL Class I's & II's ___ ___

(AA) Preparer Information

Name

Jamie R. Wiggins

Agency/Title

IEPA/EPS

Telephone

312/3459780

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(Y) Person(s) Interviewed	Title	Telephone
Leo D. Gardnell	Env. Science Analyst	312/2577761

(Z) Inspection Participants	Agency/Title	Telephone
James R. Wiggins	IEPA/EPS	312/3459780

II. Section A: Scope of Inspection.

1. Interim Status standards for the treatment, storage or disposal of HAZARDOUS WASTES SUBJECT TO 35 Ill. Adm. Code 725.101. Complete Inspection Form A, Sections B, C, D, E, and G.

2. Place an "X" in the box(es) corresponding to the facility's treatment, storage or disposal processes, and generation and/or transportation activity (if any). Complete only the applicable sections and appendixes.

Permit application process(es) (EPA Form 3510-3)			Inspection Form A section(s)
S01	[ ]	storage in containers	I
S02	[ ]	storage in tanks	J
T01	[ ]	treatment in tanks	J
S04	[X]	storage in surface impoundment	K, F
T02	[ ]	treatment in surface impoundment	K, F
D83	[ ]	disposal in surface impoundment	K, F
S03	[ ]	storage in waste pile	L
D81	[X]	disposal by land application	M, F
D80	[ ]	disposal in landfill	N, F
T03	[ ]	treatment by incineration	O, P
T04	[ ]	treatment in devices other than tanks, surface impoundments, or incinerators	Q

closure plan has been submitted for surface impoundment

Other Activities

GENERATOR	[X]	APPENDIX	GN
TRANSPORTER	[ ]	APPENDIX	TR

3. Indicate any hazardous waste processes, by process code, which have been omitted from Part A of the facility's permit application.

4. Indicate any hazardous waste processes (by process code and line number on EPA Form 3510-3 page 1 of 5) which appear to be eligible for exclusion per 35 Ill. Adm. Code 725.101(c). Provide a brief rationale for the possible exclusion.

the following pages have been removed as they do not apply to this facility F-1, I-1, J-1, L-1, N-1, N-2, O/P-1, OP-2, OP-3, Q-1, T-R-1.

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Section B: GENERAL FACILITY STANDARDS: (Part 725 Subpart B)

	YES	NO	NI*	Remarks
1. Has the Regional Administrator been notified regarding:				
a. Receipt of hazardous waste from a foreign source?			✓	none rec'd.
b. Facility expansion?			✓	not expanding
c. Change of owner or operator?			✓	not changed
2. General Waste Analysis:				
a. Has the owner or operator obtained a detailed chemical and physical analysis of the waste?	✓			detailed analysis available
b. Does the owner or operator have a detailed waste analysis plan on file at the facility?	✓			
c. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?			✓	none rec'd. from off site.
3. Security - Do security measures include: (if applicable)				
a. 24-Hour surveillance?	✓			
or				
b. i. Artificial or natural barrier around facility?	✓			fence
and				
ii. Controlled entry?	✓			
c. Danger sign(s) at entrance?	✓			
4. Owner or operator inspections:				
a. Does the owner or operator inspect the facility for malfunctions, deterioration, operator errors, and dischanges of hazardous waste that may affect human health or the environment?	✓			

*Not Inspected

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	YES	NO	NI	Remarks
b. Does the owner or operator have an inspection schedule at the facility?	✓			
c. If so, does the schedule address the inspection of the following items:				
i. monitoring equipment?	✓			
ii. safety and emergency equipment?	✓			
iii. security devices?	✓			
iv. operating and structural equipment (i.e. dikes, pumps, etc.)?	✓			
v. type of problems to be looked for during the inspection (e.g. leaky fitting, defective pump, etc.)?	✓			
vi. inspection frequency (based upon the possible deterioration rate of the equipment)?	✓			
d. Are areas subject to spills inspected daily when in use?	✓			
e. Does the owner or operator maintain an inspection log or summary of owner or operator inspections?	✓			
f. Does the inspection log contain the following information:				
i. the date and time of the inspection?	✓			
ii. the name of the inspector?	✓			
iii. a notation of the observations made?	✓			
iv. the date and nature of any repairs or remedial actions?	✓			
5. Do personnel training records include:				
a. Job titles?	✓			
b. Job descriptions?	✓			

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	YES	NO	NI	Remarks
c. Description of training?	✓			
d. Records of training?	✓			
e. Did facility personnel receive the required training by 5-19-81?	✓			
f. Do new personnel receive required training within six months?	✓			
g. Do personnel training records indicate that personnel have taken part in an annual review of initital training?	✓			training given on a regular date in 1985
6. If required, are the following special requirements for ignitable, reactive, or incompatible wastes addressed?				
a. Special handling?	✓			
b. No smoking signs?	✓			
c. Separation and protection from ignition sources?	✓			

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Section C: PREPAREDNESS AND PREVENTION: (Part 725 Subpart C)

	YES	NO	NI	Remarks
1. Maintenance and Operation of Facility:				
Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent?		✓		[illegible]
2. If required, does the facility have the following equipment:				
a. Internal communications or alarm systems?	✓			
b. Telephone or 2-way radios at the scene of operations?	✓			
c. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?	✓			

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

water at 6 thousand gallons at 150 psi

8-10 million gal water treatment basin

	YES	NO	NI	Remarks
3. Testing and Maintenance of Emergency Equipment:				
a. Has the owner or operator established testing and maintenance procedures for emergency equipment?	✓			
b. Is emergency equipment maintained in operable condition?	✓			
4. Has owner or operator provided immediate access to internal alarms? (if needed)	✓			
5. Is there adequate aisle space for unobstructed movement?	✓			
6. Has the owner or operator attempted to make arrangements with local authorities in case of an emergency at the facility?	✓			

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Section D: CONTINGENCY PLAN AND EMERGENCY PROCEDURES: (Part 725 Subpart D)

	YES	NO	NI	Remarks
1. Does the Contingency Plan contain the following information:				
a. The actions facility personnel must take to comply with §725.151 and 725.156 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.)	✓			
b. Arrangements agreed by local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §725.137?	✓			
c. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?	✓			area shift supervisors are on site 24 hrs/day, 7 days/wk. home phone numbers were not previously included but have now been added.
d. 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?	✓			all emergencies are handled thru emergency extension to North Guard House and in turn to area shift supervisors/emergency coordinators
e. 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?)	✓			
2. Are copies of the Contingency Plan available at the site and local emergency organizations?	✓			

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	YES	NO	NI	Remarks
3. Emergency Coordinator				
a. Is the facility Emergency Coordinator identified?	✓			acting shift Supervisor
b. Is coordinator familiar with all aspects of site operation and emergency procedures?	✓			
c. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	✓			
4. Emergency Procedures				
If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 725.156?	✓			

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Section E: MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING: (Part 725 Subpart E)

	YES	NO	NI	Remarks
* 1. Use of Manifest System				
a. Does the facility follow the procedures listed in §725.171 for processing each manifest? (Particularly sending a copy of the signed manifest back to the generator within 30 days after delivery.)			✓	no waste is rec'd. from off site
b. Are records of past shipments retained for 3 years?	✓			
** 2. Does the owner or operator meet requirements regarding manifest discrepancies?			✓	no waste rec'd. from off site.
** Not applicable to owners or operators of on-site facilities that do not receive any waste from off-site sources.				
3. Operating Record				
a. Does the owner or operator maintain an operating record as required in 725.173?	✓			
b. Does the operating record contain the following information:				
i. The method(s) and date(s) of each waste's treatment, storage, or disposal as required in 40 CFR Part 265 Appendix I?	✓			
ii. The location and quantity of each hazardous waste within the facility? (This information should be cross-referenced to specific manifest number, if waste was accompanied by by a manifest.)	✓			
***iii. A map or diagram of each cell or disposal area				

*** only applies to disposal facilities

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	YES	NO	NI	Remarks
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.)			✓	not applicable
iv. Records and results of all waste analyses, trial tests, monitoring data, and operator inspections?	✓			
v. Reports detailing all incidents that required implementation of the Contingency Plan?	✓			
vi. All closure and post closure costs as applicable?	✓			
4. Availability of Records				
Are all facility records required under 35 Ill. Adm. Code 725 available for inspection?	✓			
5.**Unmanifested Waste Reports				
a. Has the facility accepted any hazardous waste from an off-site generator subject to 40 CFR 262.20 or 35 Ill. Adm. Code 722.120 without a manifest or shipping paper?			✓	no waste is rec. from offsite
b. If "a" is yes, provide the identity of the source of the waste and a description of the quantity, type, and date received for each unmanifested hazardous waste shipment.				n/a

** Not applicable to owners or operators of on-site facilities that do not receive any hazardous from off-site sources.

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Section G - CLOSURE AND POST CLOSURE (Part 725, Subpart G)

	YES	NO	NI.	Remarks
1. Closure				
a. Is the facility closure plan available for inspection?	✓			
b. Has the closure plan been submitted to the Director?		✓		closure has not begun except for surface impoundment
c. Has closure begun?		✓		
*2. Post-Closure: Is the post closure plan available for inspection?	✓			

* Applies only to disposal facilities.

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Section K - SURFACE IMPOUNDMENTS (Part 725, Subpart K)

	YES	NO	NI	Remarks
1. Do surface impoundments have at least 60 cm (2 feet) of freeboard?	✓			
2. Do earthen dikes have protective covers?	✓			
3. Are waste analyses done when the impoundment is used to store a substantially different waste than before?	✓			
4. Is the freeboard level inspected at least daily?	✓			
5. Are the dikes inspected weekly for evidence of leaks or deterioration?	✓			
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.)			✓	no hazardous wastes have been placed in impoundment since 1981.
7. Are incompatible wastes stored in different impoundments? (If not, the provisions of 35 Ill. Adm. Code 725.117(b) apply).			✓	N/A

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Section M - LAND TREATMENT (Part 725, Subpart M)

	YES	NO	NI	Remarks
1. Is treated hazardous waste capable of biological or chemical degradation?	✓			
2. Are run-off and run-on diverted from the facility or collected	✓			
3. Is waste analyzed according to 725.373 ?	✓			
4. If food chain crops are grown at the facility, has the owner or operator addressed the requirements of 725.376 ?			✓	none not grown
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?	✓			
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.)			✓	not hazardous waste applied since 1981.
9. Are incompatible wastes land treated? (If yes, 725.117(b) applies).		✓		not incompatible

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Section A: Scope

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

Section B: MANIFEST REQUIREMENTS (Part 722, Subpart B)

	YES	NO	NI	Remarks
(1) Does the operator have copies of the manifest available for review?	✓			
(2) Manifests for shipments in past 12 months were examined. The approx. number of manifests shipments during that period were 6.				shipments of leaded corrosion proof (HOSA) to CID for disposal
(3) Do the manifest forms examined contain the following information: (If possible, make copies of, or record information from, manifest(s) that do not contain the critical elements).				
a. Manifest document number?	✓			
b. Name, mailing address, telephone number, and EPA ID number of Generator	✓			
c. Name and EPA ID Number of Transporter(s)?	✓			
d. Name, address, and EPA ID Number Designated permitted facility and alternate facility?	✓			
e. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	✓			
f. The total quantity of waste(s) and the type and number of containers loaded?	✓			RECEIVED
g. Required certification?	✓			JAN 2 1986
h. Required signatures?	✓			IEPA-DLPC

(4) Reportable exceptions

a. For manifests examined in (2) (except for shipments within the last 35 days), enter the number of manifests for which the generator has NOT received a signed copy from the designated facility within 35 days of the date of shipment. none

b. For manifests indicated in (4a), enter the number for which the generator has submitted exception reports (35 Ill. Adm. Code 722.142) to the Regional Administrator. none required

Section C: PRE-TRANSPORT REQUIREMENTS (Part 722, Subpart C)

	YES	NO	NI	REMARKS
1. Is wastepackaged in accordance with DOT regulations? (Required prior to movement of hazardous waste off-site)	✓			
2. Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required for movement of hazardous waste off-site)	✓			
3. If required, are placards available to transporters of hazardous waste?	✓			

4. On-site accumulation of generated wastes. A HWMF may accumulate hazardous waste it generates either (A) in its storage facility [725.101(b)] or (B) in accordance with 35 Ill. Adm. Code 722.134 [See 725.101(c)(7)]. Option B restricts all accumulation to tanks and containers. If the installation elects option A, check this box [ ] and skip to Section D. If the installation elects option B, complete the following observations:

	YES	NO	NI	REMARKS
a. Is each container clearly marked with the start of accumulation date?	✓			
b. Have more than 90 days elapsed since the date inspected in (a)?		✓		
c. Do wastes remain in accumulation tanks for more than 90 days?		✓		
d. Is each container and tank labeled or marked clearly with the words "Hazardous Waste"?	✓			

Section D: - RECORDKEEPING AND REPORTING (Part 722, Subpart D)

	YES	NO	NI	REMARKS
1. Are all tests results and analyses needed for hazardous waste determinations retained for at least three years?	✓			

Section E: INTERNATIONAL SHIPMENTS (Part 722, Subpart E)

	YES	NO	NI	REMARKS
1. Has the installation imported or exported Hazardous Waste?		✓		none imported or exported

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

a. Exporting Hazardous Waste; has a generator:

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	YES	NO	NI	Remarks
i. Notified the Administrator in writing?	___	___	___	not applicable
ii. Obtained the signature of the foreign consignee confiming delivery of the waste(s) in the foreign country?	___	___	___	
iii. Met the Manifest requirements?	___	___	___	
b. Importing Hazardous Waste; has the generator met the manifest requirements?	___	___	___	

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NARRATIVE

Union Oil generates RCRA hazardous waste K049 (slop oil emulsions), K051 (API Separator sludge), and K052 (leaded tank bottoms) from refinery operations at the facility. Prior to Sept of 1981 API Separator Sludge was land applied in a cell of approximately 1% of the total volume of land applied waste. Currently Union Oil sends all hazardous waste off site for disposal and anticipates that no hazardous waste will be land applied until a RCRA permit is obtained. The facility original part A application included another impoundment storage for their dewatering basin which was utilized in conjunction with land application. A closure plan has been submitted for this impoundment and Union Oil plans to "re-open" the impoundment for non-hazardous waste storage.

Since the previous IGS inspection of 10-31-84 Union Oil has sent several shipments of leaded tank bottom products (K052) to an off site TSD for disposal. Facility personnel participating in hazardous waste management training have had that training updated for 1985. Some minor modifications have been made to the facility's contingency plan including the addition of home telephone numbers of emergency coordinators.

Union Oil appears to be in compliance with applicable interim status standards.

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19780304
STATE IDENTIFICATION NUMBER
(If Applicable)

ILD041550567
EPA IDENTIFICATION NUMBER

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

RECEIVED 6 1984 MANAGEMENT BRANCH

I. General Information:

(A) Facility Name: Union Oil Company Chicago Refinery
(B) Street: 135th Street and New Avenue
(C) City: Lemont (D) State: Ill. (E) Zip Code: 60439
(F) Phone: 312/2577761 (G) County: Will

(H) Operator: Union Oil Company of California
(I) Street: 135th Street and New Avenue
(J) City: Lemont (K) State: Ill. (L) Zip Code 60439
(M) Phone: 312/2577761 (N) County: Will

(O) Owner: Union Oil Company of California
(P) Street: 135th Street and New Avenue
(Q) City: Lemont (R) State: Ill. (S) Zip Code: 60439
(T) Phone: 312/2577761 (U) County: Will

(V) Date of Inspection: 10-31-84 (W) Time of Inspection (From) 9:00am (To) 2:30pm

(X) Weather Conditions: ~ 55-60°F - overcast - rain

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

IL 532-0894
LPC 92 12/81

044-012

205-19

(Y) Person(s) Interviewed	Title	Telephone
Leo D. Gaskill	Conv. Science Analyst	312/2577761

(Z) Inspection Participants	Agency/Title	Telephone
Gale Hruska	USEPA	312/8860989
Rob Watson	IEPA	217/7826760
Jim Higgins	IEPA	312/3459780

(AA) Preparer Information

Name	Agency/Title	Telephone
James R. Higgins	IEPA-EPS	312/3459780

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:

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

(M) B. Land Treatment (M)

___ C. Landfills (N)

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

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

Pages 10, 12, 14, 15, 16, 17, 18, 21, have been removed from this report as they do not apply to this facility.

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)

	Yes	No	NI*	Remark
(A) Has the Regional Administrator been notified regarding:				
1. Receipt of hazardous waste from a foreign source?			✓	none recd.
2. Facility expansion?			✓	no expansion
(B) General Waste Analysis:				
1. Has the owner or operator obtained a detailed chemical and physical analysis of the waste?	✓			analysis available for wastes currently being generated.
2. Does the owner or operator have a detailed waste analysis plan on file at the facility?	✓			
3. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?			✓	none recd. from off site
(C) Security - Do security measures include: (if applicable)				
1. 24-Hour surveillance?	✓			
2. Artificial or natural barrier around facility?	✓			
3. Controlled entry?	✓			
4. Danger sign(s) at entrance?	✓			
(D) Do Owner or Operator Inspections Include:				
1. Records of malfunctions?	✓			
2. Records of operator error?	✓			
3. Records of discharges?	✓			

*Not Inspected

	Yes	No	NI*	Remarks
4. Inspection schedule?	✓	---	---	---
5. Safety, emergency equipment?	✓	---	---	---
6. Security devices?	✓	---	---	---
7. Operating and structural devices?	✓	---	---	---
8. Inspection log?	✓	---	---	---
(E) Do personnel training records include: (Effective 5/19/81)				
1. Job titles?	✓	---	---	---
2. Job descriptions?	✓	---	---	---
3. Description of training?	✓	---	---	---
4. Records of training?	✓	---	---	---
5. Have facility personnel received required training by 5-19-81?	✓	---	---	---
6. Do new personnel receive required training within six months?	✓	---	---	---
(F) If required are the following special requirements for ignitable, reactive, or incompatible wastes addressed?				
1. Special handling?	✓	---	---	---
2. No smoking signs?	✓	---	---	---
3. Separation and protection from ignition sources?	✓	---	---	---

*Not Inspected

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

	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 in vicinity of RCRA activities
(B) If required, does the facility have the following equipment:				
1. Internal communications or alarm systems?	✓			
2. Telephone or 2-way radios at the scene of operations?	✓			
3. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?	✓			

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

water available at 6 thousand gal/min at approx. 150 PSI — 8-10 million gal water treatment basin

(C) Testing and Maintenance of Emergency Equipment:				
1. Has the owner or operator established testing and maintenance procedures for emergency equipment?	✓			
2. Is emergency equipment maintained in operable conditions?	✓			
(D) Has owner or operator provided immediate access to internal alarms? (if needed)	✓			

*Not Inspected

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

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

(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.)	✓			
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?	✓			
3. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?	✓			area Shift Supervisors are on site 24 hr/day 7 days wk home phone #'s are not available. all emergencies are handled thru emergency extension to North Packard house and in turn to area Shift Supervisor/Emergency coordinator.
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?	✓			
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?)	✓			

*Not Inspected

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

VI. MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING
(Part 265 Subpart E)

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

*Not Inspected

C) Operating Record

1. Does the owner or operator maintain an operating record as required in 265.73?	✓			
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?	✓			
c. The location and quantity of each hazardous waste within the facility?	✓			
***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.)			✓	N/A
e. Records and results of all waste analyses, trial tests, monitoring data, and operator inspections?	✓			
f. Reports detailing all incidents that required implementation of the Contingency Plan?	✓			
g. All closure and post closure costs as applicable? (Effective 5-19-81)	✓			

** 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)

	Yes	No	NI*	Remarks
(A) Closure and Post Closure				
1. Is the facility closure plan available for inspection by May 19, 1981?	✓			
2. Has this plan been submitted to the Regional Administrator		✓		closure has not begun
3. Has closure begun?		✓		
4. Is closure estimate available by May 19, 1981?	✓			
(B) Post closure care and use of property				
Has the owner or operator supplied a post closure monitoring plan? (effective by May 19, 1981)			✓	

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

I
USE AND MANAGEMENT OF CONTAINERS

Facility Name: N/A Date of Inspection: N/A

	Yes	No	NI*	Remarks
1. Are containers in good condition?				N/A
2. Are containers compatible with waste in them?				N/A
3. Are containers stored closed?				N/A
4. Are containers managed to prevent leaks?				N/A
5. Are containers inspected weekly for leaks and defects?				N/A
6. Are ignitable & reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive.)				N/A

	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: N/A gallons

   Tank diameter: N/A feet

   Distance of tank from property line N/A 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: Union Oil Date of Inspection: 10-31-84

	Yes	No	NI*	Remarks
1. Do surface impoundments have at least 60 cm (2 feet) of freeboard?	✓			
2. Do earthen dikes have protective covers?	✓			
3. Are waste analyses done when the impoundment is used to store a substantially different waste than before?	✓			
4. Is the freeboard level inspected at least daily?	✓			
5. Are the dikes inspected weekly for evidence of leaks or deterioration?	✓			
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.)			✓	no hazardous waste has been placed in impoundment after 1981.
7. Are incompatible wastes stored in different impoundments? (If not, the provisions of 40 CFR 265.17(b) apply.)			✓	N/A

M

LAND TREATMENT

Facility Name: Union Oil Date of Inspection: 10-31-84

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?	✓			
4. If food chain crops are grown at the facility, has the owner or operator addressed the requirements of 265.276?			✓	none
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?	✓			
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.)			✓	N/A
9. Are incompatible wastes land treated? (If yes, 265.17(b) applies)			✓	N/A

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

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 §261.22, 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?	✓			
(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?	✓			
2. Name, mailing address, telephone number, and EPA ID Number of Generator	✓			

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

2. PRE-TRANSPORT REQUIREMENTS

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

VI. RECORDKEEPING and REPORTING
(Part 262, 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?	✓			
(B) Has the generator submitted Annual Reports and Exception Reports as required?	✓			

VII. INTERNATIONAL SHIPMENTS
(Part 262, Subpart E)

	Yes	No	NI*	Remarks
Has the installation imported or exported Hazardous Waste?		✓		none

(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?				N/A
b. Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country?				N/A
c. Met the Manifest requirements?				N/A
2. Importing Hazardous Waste, has the generator:				
Met the manifest requirements?				N/A

*Not Inspected

X

TRANSPORTER REQUIREMENTS
40 CFR Part 263

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.?			✓	none exported
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?		✓		none imported
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.

Union Oil Company generates RCRA hazardous wastes K051 (API Seperator sludge), K049 (slop oil emulsions), and tank cleaning wastes (potentially D001), from refinery operations at the facility. On site RCRA activities consist of land treatment plots and surface impoundment storage. No hazardous wastes have been placed in either the surface impoundment or on the land treatment plots since Sept. of 1981. Prior to that time API Seperator sludge was applied to the landfarm at a rate of approximately 1% of the total volume of applied wastes. The remainder being various nonhazardous refinery wastes.

The original part A permit application was subsequently revised to exclude tank storage and surface impoundment storage which are not necessary for current operations. A formal closure plan will however be submitted for the impoundment which will later be "re-opened" as a non-hazardous storage and dewatering basin.

The facility's part B application has been limited to the land treatment plots only. No other on site activities will occur under the RCRA permit.

Currently all hazardous wastes generated are transported to permitted TSD facilities utilizing the supplemental permit and manifest system. Lot is

anticipated that on site land application of hazardous wastes will occur only after the facility's RCRA permit is obtained.

Subpart F (groundwater monitoring), Subpart G (closure), and Subpart H (financial requirements), were not addressed during this ISS inspection as they have been independently reviewed. With the exception of these areas, the facility appears to be in compliance with applicable interim status requirements.

APPENDIX A-1

FACILITY INSPECTION FORM FOR COMPLIANCE WITH INTERIM STATUS STANDARDS COVERING GROUND-WATER MONITORING

Company Name: Union Oil Company; IEPA I.D. Number: 19780304

Company Address: 135th & New Ave.; USEPA I.D. Number: ILD041550567

Lemont, IL. 60439 Inspector's Name: Craig Liska

Company Contact/Official: Leo Erchull ; Branch/Organization: _____

Title: Environmental Science Analyst; Date of Inspection: 8-16-84

	Yes	No	Unknown	Waviēd
Type of facility: (check appropriately)				
a) surface impoundment	✓			
b) landfill		✓		
c) land treatment facility	✓			
d) disposal waste pile*		✓		
Ground-Water Monitoring Program				
1. Was the ground-water monitoring program reviewed prior to site visit? If "No,"	✓			
a) Was the ground-water program reviewed at the facility prior to site inspection?				
2. Has a ground-water monitoring program (capable of determining the facility's impact on the quality of groundwater in the uppermost aquifer underlying the facility) been implemented? 725.190(a)	✓			

*Listed separate from landfill for convenience of identification.

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	Yes	No	Unknown	Wavied
3. Has at least one monitoring well been installed in the uppermost aquifer hydraulically upgradient from the limit of the waste management area? 725.191(a)(1)	✓			
a) Are ground-water samples from the uppermost aquifer, representative of background ground-water quality and not affected by the facility (as ensured by proper well number, locations and depths?)	✓			
4. Have at least three monitoring wells been installed hydraulically downgradient at the limit of the waste handling or management area? 725.191(a)(2)	✓			
a) Do well numbers, locations and depths ensure prompt detection of any statistically significant amounts of hazardous waste or hazardous waste constituents that migrate from the waste management area to the uppermost aquifer?	✓			
5. Have the locations of the waste management areas been verified to conform with information in the ground-water program?	✓			
a) If the facility contains multiple waste management components, is each component adequately monitored?			N/A	
6. Do the numbers, locations, and depths of the ground-water monitoring wells agree with the data in the ground-water monitoring system program? If "No," explain discrepancies.	✓			
7. Well completion details. 725.191(c)				
a) Are wells properly cased?	✓			
b) Are wells screened (perforated) and packed where necessary to enable sampling at appropriate depths?	✓			
c) Are annular spaces properly sealed to prevent contamination of ground-water?	✓			

	Yes	No	Unknown	Wavied
8. Has a ground-water sampling and analysis plan been developed? 725.192(a)	✓			
a) Has it been followed?	✓			
b) Is the plan kept at the facility:	✓			
c) Does the plan include procedures and techniques for:				
1) Sample collection?	✓			
2) Sample preservation?	✓			
3) Sample shipment?	✓			
4) Analytical procedures?	✓			
5) Chain of custody control?	✓			
9. Are the required parameters in ground-water samples being tested quarterly for the first year? 725.192(b) and 725.192(c)(1)	✓			
a) Are the ground-water samples analyzed for the following:				
1) Parameters characterizing the suitability of the ground-water as a drinking water supply? 725.192(b)(1)	✓			
2) Parameters establishing ground-water quality? 725.192(b)(2)	✓			
3) Parameters used as indicators of ground-water contamination? 725.192(b)(3)	✓			
(i) For each indicator parameter are at least four replicate measurements obtained at each upgradient well for each sample obtained during the first year of monitoring? 725.192(c)(2)	✓			
(ii) Are provisions made to calculate the initial background arithmetic mean and variance of the respective parameter concentrations or values obtained from the upgradient well(s) during the first year? 725.192(c)(2)	✓			

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	Yes	No	Unknown	Wavied
b) For facilities which have completed first year ground-water sampling and analysis requirements:				
1) Have samples been obtained and analyzed for the ground-water quality parameters at least annually? 725.192(d)(1)	✓			
2) Have samples been obtained and analyzed for the indicators of ground-water contamination at least semi-annually? 725.192(d)(2)	✓			
c) Were ground-water surface elevations determined at each monitoring well each time a sample was taken? 725.192(e)	✓			
d) If it was determined that modification of the number, location or depth of monitoring wells was necessary, was the system brought into compliance with 725.191(a)? 725.193			N/A	
10. Has an outline of a ground-water quality assessment program been prepared? 725.193(a)	✓			
a) Does it describe a program capable of determining:				
1) Whether hazardous waste or hazardous waste constituents have entered the ground-water?	✓			
2) The rate and extent of migration of hazardous waste or hazardous waste constituents in ground-water?	✓			
3) Concentrations of hazardous waste or hazardous waste constituents in ground-water?	✓			
b) Were records kept of the analyses and evaluations, specified in the ground-water quality assessment (throughout the active life of the facility)? 725.194(b)(1)	✓			
1) If a disposal facility, were(are) records kept through the post-closure period as well?			The facility is not closed yet	

	Yes	No	Unknown	Wavied
11. Have records been kept of analyses for parameters in 725.192(c) and (d)? 725.194(a)(1)	✓			
12. Have records been kept of ground-water surface elevations taken at the time of sampling for each well? 725.194(a)(1)	✓			
13. Have records been kept of required elevations in 725.192(e)? 725.194(a)(1)	✓			

*EPA will be proposing (Spring 1982) to replace this reporting requirement with an exception reporting system where reports will be submitted only where maximum contaminant levels or significant changes in the contamination indicators or other parameters are observed. EPA has delayed compliance stage for 14 a) above until August 1, 1982 (Federal Register, February 23, 1982, p. 7841-7842) to be coupled with exception reporting in the interim.

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APPENDIX A-2

COMPLIANCE FORM FOR A FACILITY WHICH MAY BE AFFECTING GROUND-WATER QUALITY

Company Name: Union Oil Company ; IEPA I.D. Number: 1978030 4

Company Address: 135th & New Ave. ; USEPA I.D. Number: ILD041550567

Lemont, IL. 60439 Inspector's Name: Craig Liska

Company Contact/Official: Leo Erckull ; Branch/Organization: _____

Title: Environmental Science Analyst ; Date of Inspection: Aug. 16, 1984

	Yes	No	Unknown
Type of facility: (check appropriately)			
a) surface impoundment	✓		
b) landfill		✓	
c) land treatment facility	✓		
d) disposal waste pile		✓	
1. Have comparisons of ground-water contamination indicator parameters for the upgradient well(s) 725.193(b) shown a significant increase (or pH decrease as well) over initial background?	✓		
a) If "Yes," has this information been submitted to the Director according to 725.194(a)(2)(ii)?	✓		
2. Have comparisons of indicator parameters for the downgradient wells 725.193(b) shown a significant increase (or pH decrease as well) over initial background?	✓		
a) If "Yes," were additional ground-water samples taken for those downgradient wells where the significant difference was determined? 725.193(c)(2)	✓		
1) Were samples split in two?	✓		
2) Was the significant difference due to human (e.g., laboratory) error? (If "Yes," do not continue.)		✓	

	Yes	No	Unknown
3. If significant differences were not due to error, was a written notice sent to the Director within 7 days of confirmation?	✓		
4. Within 15 days of notification of the Director was a certified ground-water quality assessment plan submitted? 725.193(d)(2)	✓		
a) Does the plan specify 725.193(d)(3):			
1) well information (specifics):			
(a) number?	✓		
(b) locations?	✓		
(c) depths?	✓		
2) sampling methods?	✓		
3) analytical methods?	✓		
4) evaluation methods?	✓		
5) schedule of implementation?	✓		
b) Does the plan allow for determination of 725.193(d)(4):			
1) Rate and extent of migration of hazardous waste or hazardous waste constituents?		✓	
2) Concentrations of the hazardous waste or hazardous waste constituents?		✓	
c) Is it indicated that the first determination was made as soon as technically feasible? 725.193(d)(5)			
1) Within 15 days after the first determination was a written report containing the assessment of ground-water quality submitted to the Director?			
d) Was it determined that hazardous waste or hazardous waste constituents from the facility have entered the ground-water?			
1) If "No," was the original indicator evaluation program, required by 725.192 and 725.193(b), reinstated?			

Currently, it is not technically feasible to have the facility make their first determination. The proposed assessment plan has not yet been approved by the Agency.

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	Yes	No	Unknown
(a) Was the Director notified of the reinstatement of program within 15 days of the determination? 725.193(d)(6)	___	___	N/A
e) If it was determined that hazardous waste or hazardous waste constituents have entered the ground-water 725.193(d)(7):			
1) For facilities where a program was implemented prior to final closure, are determinations of hazardous waste or hazardous waste constituents continued on a quarterly basis? (If a program was implemented during the post-closure care period, determinations made in accordance with the ground-water quality assessment plan may cease after the first determination.)	___	___	
(a) Were subsequent ground-water quality reports submitted to the Director within 15 days of determination?	___	___	
f) Are annual reports submitted to the Director containing the results of the ground-water quality assessment program? 725.194(b)(2)	___	___	
1) Do the reports include the calculated or measured rate of migration of hazardous waste or hazardous waste constituents during the reporting period?	___	___	

Not - Applicable

APPENDIX A-3

INSPECTION COMPLIANCE FORM FOR DEMONSTRATING
A WAIVER OF INTERIM STATUS REQUIREMENTS

Company Name: _____; IEPA I.D. Number: _____

Company Address: _____; USEPA I.D. Number: _____

_____ Inspector's Name: _____

_____

Company Contact: _____; Branch/Organization: _____

Title: _____; Date of Inspection: _____

	Yes	No	Unknown
1. Is a written waiver demonstration kept at the site?	___	___	
2. Is the demonstration certified by a qualified geologist or geotechnical engineer? 725.190(c)	___	___	
3. Does the waiver demonstration establish:			
a) The potential for migration of hazardous waste or hazardous waste constituents from the facility to the uppermost aquifer? 725.190(c)(1)	___	___	
b) An evaluation of a water balance including:			
1) Precipitation?	___	___	
2) Evapotranspiration?	___	___	
3) Runoff?	___	___	
4) Infiltration? (including any liquid in surface impoundments)	___	___	
c) Unsaturated zone characteristics?	___	___	
1) Geologic materials?	___	___	
2) Physical properties?	___	___	
3) Depth to ground-water?	___	___	

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	Yes	No	Unknown
d) The potential for hazardous waste or hazardous waste constituents which may enter the uppermost aquifer to migrate to a water supply well or surface water, by evaluation of: 725.190(c)(2)			
1) Saturated zone characteristics, including:			
(a) Geologic materials?	___	___	
(b) Physical properties?	___	___	
(c) Rate of ground-water flow?	___	___	
2) Proximity of the facility to water supply wells or surface water?	___	___	

APPENDIX -B

GROUND-WATER MONITORING AND ALTERNATE SYSTEM
TECHNICAL INFORMATION FORM

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APPENDIX B

GROUND-WATER MONITORING AND ALTERNATE SYSTEM
TECHNICAL INFORMATION FORM

1.0 Background Data:

Company Name: Union Oil Company ; EPA I.D.#: ILD041550567
Company Address: 135th & New Ave
Lemont, Illinois 60439

Inspector's Name: Craig Liska ; Date: 8-16-84

1.1 Type of facility (check appropriately):

1.1.1 surface impoundment ✓
1.1.2 landfill ___
1.1.3 land treatment facility ✓
1.1.4 disposal waste pile ___

1.2 Has a ground-water monitoring system been established? (Y/N) Y

1.2.1 Is a ground-water quality assessment program outlined or proposed? (Y/N) Y

If Yes,

1.2.2 Was it reviewed prior to the site visit? (Y/N) Y

1.3 Has a ground-water quality assessment program been implemented or proposed at the site? (Y/N) Y

If yes, Appendix C, Ground-Water Quality Assessment Program Technical Information Form must be utilized also.

2.0 Regional/Facility Map(s)

2.1 Is a regional map of the area, with the facility delineated, included? (Y/N) Y

If yes,

2.1.1 What is the origin and scale of the map? USGS 1:24000

2.1.2 Is the surficial geology adequately illustrated? (Y/N) Y

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2.1.3 Are there any significant topographic or surficial features evident? (Y/N) Y

If yes, describe An intermittent stream passes through the waste management area between two land farming plots.

2.1.4 Are there any streams, rivers, lakes, or wet lands near the facility? (Y/N) Y

If yes, indicate approximate distances from the facility Illinois-Michigan Canal is approximately 4,000 feet from the landfarm area.

2.1.5 Are there any discharging or recharging wells near the facility? (Y/N) Y

If yes, indicate approximate distances from the facility. 700', 1300' and 1800' from the waste management area

2.2 Is a regional hydrogeologic map of the area included? (This information may be shown on 2.1) (Y/N) N

If yes:

2.2.1 Are major areas of recharge/dishcarge shown? (Y/N) ___

If yes, describe. ___

2.2.2 Is the regional ground-water flow direction indicated? (Y/N) ___

2.2.3 Are the potentiometric contours logical? (Y/N) ___
If not, explain. ___

2.3 Is a facility plot plan included? (Y/N) Y

2.3.1 Are facility components (landfill areas, impoundments, etc.) shown? (Y/N) Y

2.3.2 Are any seeps, springs, streams, ponds, or wetlands indicated? (Y/N) Y

2.3.3 Are the locations of any monitoring wells, soil borings, or test pits shown? (Y/N) Y

2.3.4 Is the facility a multi-component facility? (Y/N) N

If yes:

2.3.4.1 Are individual components adequately monitored? (Y/N) ____

2.3.4.2 Is a Waste Management Area delineated? (Y/N) ____

2.4 Is a site water table (potentiometric) contour map included? (Y/N) Y

If yes,

2.4.1 Do the potentiometric contours appear logical based on topography and presented data? (Consult water level data) (Y/N) Y

2.4.2 Are groundwater flowlines indicated? (Y/N) Y

2.4.3 Are static water levels shown? (Y/N) Y

2.2.4 May hydraulic gradients be estimated? (Y/N) Y

2.4.5 Is at least one monitoring well located hydraulically upgradient of the waste management area(s)? (Y/N) Y

2.4.6 Are at least three monitoring wells located hydraulically downgradient of the waste management area(s)? (Y/N) Y

2.4.7 By their location, do the upgradient wells appear capable of providing representative ambient groundwater quality data? (Y/N) Y

If no, explain. ____

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3.0 Soil Boring/Test Pit Details

3.1 Were soil borings/test pits made under the supervision of a qualified professional? (Y/N) Y

If yes,

3.1.1 Indicate the individual(s) and affiliation(s): Glenn Wittman - hydrologist for Converse/Tenech Consultants and Todd Gates - geologist for T.M. Gates, Inc.

3.1.2 Indicate the drilling/excavating contractor, if known D & G Drilling and Cavanie Construction Co.

3.2 If soil borings/test pits were made, indicate the method(s) of drilling/excavating:

- Auger (hollow or solid stem) ✓
- Mud rotary ✓
- Air rotary ____
- Reverse rotary ____
- Cable tool ____
- Jetting ____
- Other, including excavation (explain) ____

3.3 List the number of soil borings/test pits made at the site

3.3.1 Pre-existing 1

3.3.2 For RCRA compliance 14

3.4 Indicate borehole diameters and depths (if different diameters and depths use TABLE B-1).

3.4.1 Diameter: See August 1981 Converse/Tenech report along with

3.4.2 Depth: June 4, 1984 letter and report from T.M. Gates, Inc.

3.5 Were lithologic samples collected during drilling? (Y/N) Y

If yes,

3.5.1 How were samples obtained? (Check method(s))

- Split spoon ✓
- Shelby tube, or similar ____
- Rock coring ____
- Ditch sampling ____
- Other (explain) ____

INFORMATION TABLE B-1

See August 81 Converse/Teneco report and June 4, 1984 letter and report to Union Oil from T.M. Gates, Inc.

BORING NO.	DEPTH	DIAMETER

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3.5.2 At what interval were samples collected? 5 foot intervals

3.5.3 Were the deposits or rock units penetrated described? (boring logs, etc.) (Y/N) Y

3.6 If test pits were excavated at the site, describe procedures. _____

4.0 Well Completion Detail

4.1 Were the wells installed under the supervision of a qualified professional? (Y/N) Y

If yes:

4.1.1 Indicate the individual and affiliation, if known Glenn Wittman, Converse/Tenech and Todd Gates, T.M. Gates, Inc.

4.1.2 Indicate the well construction contractor, if known D & G Drilling and Canovia Construction Co.

4.2 List the number of wells at the site

4.2.1 Pre-existing 1

4.2.2 For RCRA Compliance 14

4.3 Well construction information (fill out INFORMATION TABLE B-2)

4.3.1 If PVC well screen or casing is used, are joints (couplings):

- Glued on ✓
- Screwed on ✓

Newer wells have screwed on joints (MW-7, 8, 9 and all SW series)

4.3.2 Are well screens sand/gravel packed? (Y/N) Y

INFORMATION TABLE B-2

MW-4 was installed in 1979 by Dames & Moore – remaining wells installed by Converse/TenEck.

	WELL NO.	G101 MW-1	G102 MW-2	G103 MW-3	G104 MW-4 #	G105 MW-5	G106 MW-6
	GROUND ELEVATION	715.0	719.3	704.0	692.8	683.2	696.8
	TOTAL DEPTH from ground surface	108.75	110.0	100.0	78.8	88.0	90.0
WELL CASING	TYPE MATERIAL	PVC	PVC	PVC	PVC	PVC	PVC
	DIAMETER	4"	4"	4"	4"	4"	4"
	LENGTH	91.55	92.6	82.3	50.1	70.2	71.4
	STICK-UP	2.8	2.6	2.3	1.6	2.2	1.4
	TOP ELEVATION	717.80	721.9	706.3	694.4	685.4	698.2
	BOTTOM ELEVATION	626.25	629.3	624.0	644.3	615.2	626.8
WELL SCREEN	DEPTH TOP/BOTTOM	88.75/108.75	90.0/110.0	80.0/100.0	48.5/78.8	68.0/88.0	70.0/90.0
	TYPE MATERIAL	PVC	PVC	PVC	PVC	PVC	PVC
	DIAMETER	4"	4"	4"	4"	4"	4"
	LENGTH	20.0	20.0	20.0	30.3	20.0	20.0
	SLOT SIZE	.006"	.006"	.006"	?	.006"	.006"
	TOP ELEVATION	626.25	629.3	624.0	644.3	615.2	626.8
	BOTTOM ELEVATION	606.25	609.3	604.0	614.0	595.2	606.8
OPEN HOLE OR SAND/GRAVEL PACK	DEPTH TOP/BOTTOM	63.5/111.5	78.0/116.5	56.25/101.5	35.0/78.8	46.0/88.0	42.5/91.5
	DIAMETER	8"	8"	8"	8"	8"	8"
	LENGTH	48	38.5	45.25	43.8	42.0	49
	TOP ELEVATION	651.5	641.3	647.75	657.8	637.2	654.3
	BOTTOM ELEVATION	603.5	602.8	602.50	614.0	595.2	605.3
Ground surface elevation		715.00	719.00	704.00	692.8	683.20	696.80
Top of casing (metal) elevation		717.85	721.93	706.33	694.43	685.44	698.15

(Both as measured in March – April 1984)

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All wells installed by T.M. Gates Inc.

INFORMATION TABLE B-2

		Uppermost aquifer monitor wells			Perched water zones monitoring wells		
	WELL NO.	G107 MW-7	G108 MW-8	G109 MW-9	GT01 SW-1	GT04 SW-4	GT05 SW-5
	GROUND ELEVATION	699.5	668.0	723.00	715.50	693.40	682.90
	TOTAL DEPTH from ground surface	97.3	57.5	108.5	23.00	53.5	32.0
WELL CASING	TYPE MATERIAL	PVC	PVC	PVC	PVC	PVC	PVC
	DIAMETER	2"	2"	2"	2"	2"	2"
	LENGTH	79.72	39.91	90.90	5.81	36.03	14.62
	STICK-UP	2.42	2.41	2.40	2.81	2.53	2.62
	TOP ELEVATION	701.92	670.41	725.40	718.31	695.93	685.52
	BOTTOM ELEVATION	622.20	630.50	634.50	712.50	659.90	670.90
WELL SCREEN	DEPTH TOP/BOTTOM	77.3 / 97.3	37.5 / 57.5	88.5 / 108.5	3.0 / 23.0	33.5 / 53.5	12.0 / 32.0
	TYPE MATERIAL	PVC	PVC	PVC	PVC	PVC	PVC
	DIAMETER	2"	2"	2"	2"	2"	2"
	LENGTH	20'	20'	20'	20.0'	20.0'	20.0'
	SLOT SIZE	.006"	.006"	.006"	.006"	.006"	.006"
	TOP ELEVATION	622.20	630.50	634.50	712.50	659.90	670.90
	BOTTOM ELEVATION	602.20	610.50	614.50	692.50	639.90	650.90
OPEN HOLE OR SAND/GRAVEL PACK	DEPTH TOP/BOTTOM	75.5 / 97.3	30.0 / 57.5	85.0 / 108.5	2.5' / 23	15.0 / 53.5	10.0 / 32.0
	DIAMETER	6"	6"	6"	6"	6"	6"
	LENGTH	21.8	27.5	23.5	20.5	38.5	22.0
	TOP ELEVATION	624.00	638.00	638.00	713.00	678.40	672.90
	BOTTOM ELEVATION	602.20	610.50	614.50	692.50	639.90	650.90
Ground surface elevation		699.5	668.0	723.0	715.5	693.4	682.90
Top of casing (metal) elevation		701.96	670.38	725.25	718.31	695.97	685.50

(Both as measured in March-April 1984)

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All wells installed by T. M. Gates, Inc.

INFORMATION TABLE B-2

Perched water zone monitor wells

	WELL NO.	GT07 SW-7	GT08 SW-8	GT09 SW-9			
	GROUND ELEVATION	699.4	667.40	723.20			
	TOTAL DEPTH from ground surface	47.0	29.0	34.0			
WELL CASING	TYPE MATERIAL	PVC	PVC	PVC			
	DIAMETER	2"	2"	2"			
	LENGTH	29.53	11.32	15.87			
	STICK-UP	2.53	2.32	1.87			
	TOP ELEVATION	701.93	669.72	725.07			
	BOTTOM ELEVATION	672.40	658.40	709.20			
WELL SCREEN	DEPTH TOP/BOTTOM	27.0 / 47.0	9.0' / 29.0'	14.0' / 34.0'			
	TYPE MATERIAL	PVC	PVC	PVC			
	DIAMETER	2"	2"	2"			
	LENGTH	20.0'	20.0'	20.0'			
	SLOT SIZE	.006"	.006"	.006"			
	TOP ELEVATION	672.40	658.40	709.20			
	BOTTOM ELEVATION	652.40	638.40	689.20			
OPEN HOLE OR SAND/GRAVEL PACK	DEPTH TOP/BOTTOM	24.0' / 67.0'	7.0' / 29.0'	12.0' / 34.0'			
	DIAMETER	6"	6"	6"			
	LENGTH	43.0	22.0	22.0			
	TOP ELEVATION	675.40	660.40	711.20			
	BOTTOM ELEVATION	632.40	638.40	689.20		RECEIVED	
Ground surface elevation		699.4	667.4	723.2		SEP 05 1984	
Top of casing (metal) elevation		701.97	669.71	725.09		IEPA-DLPC	

(Both as measured in March-April 1984)

4.3.3 Are annular spaces sealed? (Y/N) Y

If yes, describe:

- bentonite slurry ____
- Cement grout ____
- Other (explain) ____

The older wells have 3' of bentonite pellets above sand pack then clay backfill to 3 feet below ground surface then cement to surface.

- Thicknesses of seals The new wells have 1 foot bentonite seals clay backfill and 2' cement surface seals.

4.3.4 If "open hole" wells, are the cased portions sealed in place? (Y/N) ____

If yes, describe how: N/A

4.3.5 Are there cement surface seals? (Y/N) Y

If yes,

- How thick? 2 and 3 feet seals

4.3.6 Are the wells capped? (Y/N) Y

If yes,

- Do they lock? (Y/N) ____

The wells outside the fenced area have locks and metal stand pipes. The interior wells do not have locks

4.3.7 Are protective standpipes cemented in place? (Y/N) ____

4.3.8 Were wells developed? (Y/N) Y

If yes, check appropriate method(s):

- Air lift pumping ____
- Pumping and surging ____
- Jetting ____
- Bailing ✓
- Other (explain) ____

5.0 Aquifer Characterization

5.1 Has the extent of the uppermost saturated zone (aquifer) in the facility area been defined? (Y/N) Y

If yes,

5.1.1 Are soil boring/test pit logs included? (Y/N) Y

5.1.2 Are geologic cross-sections included? (Y/N) Y

5.2 Is there evidence of confining (low permeability) layers beneath the site? (Y/N) Y

If yes,

on-site only

5.2.1 Is the areal extent and continuity indicated? (Y/N) ____

5.2.2 Is there any potential for saturated conditions (perched water) to occur above the uppermost aquifer? (Y/N) Y

If yes, give details: _____

a) Should or is this perched zone being monitored? (Y/N) Y

Explain Six wells have been established to monitor the perched zones

5.2.3 What is the lithology and texture of the uppermost saturated zone (aquifer)? silty sand in the perched zones and dolomite in the uppermost aquifer.

5.2.4 What is the saturated thickness, if indicated? ?

5.3 Were static water levels measured? (Y/N) Y

If yes,

5.3.1 How were the water levels measured (check method(s)).

- Electric water sounder ✓
- Wetted tape ____
- Air line ____
- Other (explain) ____

5.3.2 Do fluctuations in static water levels occur? (Y/N) Y

If yes,

5.3.2.1 Are they accounted for (e.g. seasonal, tidal, etc.)? (Y/N) Y

If yes, describe: Seasonal

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

If yes,

5.3.2.3 Will the effectiveness of the wells to detect contaminants be reduced? (Y/N) ____

Explain ____

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

If yes, explain ____

5.4 Have aquifer hydraulic properties been determined? (Y/N) Y

If yes,

5.4.1 Indicate method(s):

- Pumping tests ____
- Falling/constant head tests ✓
- Laboratory tests (explain) ____

5.4.2 If determined, what are the values for:

- Transmissivity ____
- Storage coefficient ____
- Leakage ____
- Permeability ✓
- Porosity ____
- Specific capacity ____

5.4.3 In cases where several tests were undertaken, were discrepancies in the results evident? (Y/N) N/A

If yes, explain ____

5.4.4 Were horizontal ground-water flow velocities determined? (Y/N) Y

If yes, indicate rate of movement 3.56×10^{-5} cm/sec.

6.0 Well Performance

6.1 Are the monitoring wells screened in the uppermost aquifer? (Y/N) Some well screens are set in the silty clay, silty sand that lies just above the dolomite.

6.1.1 Is the full saturated thickness screened? (Y/N) N The screen bottom rests on or slightly into the dolomite.

6.1.2 For single completions, are the intake areas in the: (check appropriate levels)

- Upper portion of the aquifer ✓
- Middle of the aquifer ____
- Lower portion of the aquifer ____

6.1.3 For well clusters, are the intake areas open to different portions of the aquifer? (Y/N) N/A

6.1.4 Do the intake levels of the monitoring wells appear to be justified due to possible contaminant density and groundwater flow velocity? (Y/N) Y

7.0 Ground-Water Quality Sampling

7.1 Is a sampling (groundwater quality) program and schedule included? (Y/N) Y

7.2 Are sample collection field procedures clearly outlined? (Y/N) Y

7.2.1 How are samples obtained: (check method(s))

- Air lift pump ____
- Submersible pump ____
- Positive displacement pump ____
- Centrifugal pump ____
- Peristaltic or other suction-lift pump ____
- Bailer ✓
- Other (describe) ____

7.2.2 Are all wells sampled with the same equipment and procedures? (Y/N) Y

If no, explain ____

7.2.3 Are adequate provisions included to clean equipment after sampling to prevent cross-contamination between wells? (Y/N) Y

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7.2.4 Are organic constituents to be sampled? (Y/N) TOC, TOX

If yes,

7.2.4.1 Are samples collected with equipment to minimize absorption and volatilization? (Y/N) Y

If yes,

Describe equipment PVC bailer

8.0 Sample Preservation and Handling

8.1 Have appropriate sample preservation and preparation procedures been followed (filtration and preservation where appropriate)? (Y/N) Y

8.2 Are samples refrigerated? (Y/N) Y

8.3 Are EPA recommended sample holding period requirements adhered to? (Y/N) Y

8.4 Are suitable container types used? (Y/N) Y

8.5 Are provisions made to store and ship samples under cold conditions (ice packs, etc.)? (Y/N) Y

8.6 Is a chain of custody control procedure clearly defined? (Y/N) Y

8.7 Is a specific chain of custody form illustrated? (Y/N) Y

If yes,

8.7.1 Will this form provide an accurate record of sample possession from the moment the sample is taken until the time it is analyzed? (Y/N) Y

9.0 Sample Analysis and Record Keeping

9.1 Is sample analysis performed by a qualified laboratory? (Y/N) Y

Indicate lab ETC of Edison, NJ and Union Oil Brea Research Center; Brea, California

9.2 Are analytical methods described in the records? (Y/N) Y

9.2.1 Are analytical methods acceptable to EPA? (Y/N) Y

9.3 Are the required drinking water suitability parametters tested for? (Y/N) Y

9.4 Are the required groundwater quality parameters tested for? (Y/N) Y

9.5 Are the required groundwater contamination indicator parameters tested for? (Y/N) Y

9.6 Are any analytical parameters determined in the field? (Y/N) Y

Identify:

- pH ✓
- Temperature
- Specific conductance ✓
- Other (describe) _____

9.7 Is a plan included to record information about each sample collected during the groundwater monitoring program? (Y/N) Y

9.7.1 Are field activity logs included? (Y/N) Y

9.7.2 Are laboratory results included? (Y/N) Y

9.7.3 Are field procedures recorded? (Y/N) Y

9.7.4 Are field parameter determinations included? (Y/N) Y

9.7.5 Are the names and affiliation of the field personnel included? (Y/N) Y

9.8 Are statistical analyses planned or shown for all water quality results where necessary? (Y/N) Y

9.8.1 Is an analysis program set-up which adheres to EPA guidelines? (Y/N) Y

9.8.2 Is Student's t-test utilized? (Y/N) Y
If other evaluation procedure used, identify _____

9.8.3 Are provisions made for submitting analysis reports to the Regional Administrator? (Y/N) Y

10.0 Site Verification

10.1 Plot Plan indicating the locations of various facility components, ground-water monitoring wells, and surface waters? (Y/N Y)

10.1.1 Is the plot plan used for the inspection the same as in the monitoring program plan documentation? (Y/N) Y

If not, explain _____

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10.1.2 Are all of the components of the facility identified during the inspection addressed in the monitoring program documentation? (Y/N) Y

If not, explain _____

10.1.3 Are there any streams, lakes or wetlands on or adjacent to the site? (Y/N) Y

If yes, indicate distances from waste management areas An intermittent stream flows through the waste management area between two land farming areas

10.1.4 Are there any signs of water quality degradation evident in the surface water bodies? (Y/N) N

If yes, explain _____

10.1.5 Is there any indication of distressed or dead vegetation on or adjacent to the site? (Y/N) N

If yes, explain _____

10.1.6 Are there any significant topographic or surficial features on or near the site (e.g., recharge or discharge areas)? (Y/N) Y

If yes, explain the intermittent stream

10.1.7 Are the monitor well locations and numbers in agreement with the monitoring program documentation? (Y/N) Y

If no, explain _____

10.1.7.1 Were locations and elevations of the monitor wells surveyed into some known datum? (Y/N) Y

If not, explain _____

10.1.7.2 Were the wells sounded to determine total depth below the surface? (Y/N) Y

If not, explain _____

10.1.7.3 Were discrepancies in total depth greater than two feet apparent in any well? (Y/N) N

If yes, explain _____

10.1.8 Was ground water encountered in all monitoring wells? (Y/N) Y

If not, indicate which well(s) were dry _____

10.1.9 Were water level elevations measured during the site visit? (Y/N) Y

If yes, indicate well number and water level elevation _____

If not, explain _____

G101 = 622.90
G102 = 624.78
G103 = 623.16
G104 = 623.24
G105 = 621.64
G107 = 616.96
G108 = 622.64
G109 = 622.96

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APPENDIX - C

GROUND-WATER QUALITY ASSESSMENT PROGRAM
INFORMATION FORM

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APPENDIX C

GROUND-WATER QUALITY ASSESSMENT PROGRAM
INFORMATION FORM

Company Name: Union Oil Company ; EPA I.D.#: ILD041550567
Company Address: 135th & New Ave.
Lemont, IL. 60439

Inspector's Name: Craig Liska ; Date: 8-16-84

1.0 Background

1.1 List the constituents (contaminants) originating from the waste management area: (use separate sheet if necessary The presence of constituents has not yet been determined. The assessment plan has not been approved by the Agency. A revised plan is due October 3.

1.2 Have the concentrations of the hazardous waste or hazardous waste constituents shown significant increases in:

- upgradient monitoring wells (Y/N) Y
- downgradient monitoring wells (Y/N) Y

1.2.1 List or indicate on a map, the wells which have shown significant increases: (use separate sheet if necessary) Upgradient well G101: pH increase, upgradient well G102 = Sc and pH increase, downgradient well G104 = pH increase, downgradient well G106 = pH increase

1.3 Were the significant increases in contaminant concentration determined through the use of the student's t-Test? (Y/N) Y

If no,

1.3.1 Explain procedure used

1.4 Has the possibility of error (e.g., laboratory) been eliminated? (Y/N) Y

1.4.1 Explain The wells were resampled and analyzed in March 1984 to confirm the November 1983 results.

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2.0 Contaminant Characteristics

2.1 If available, list the chemical and physical properties of the contaminants which have been detected in the ground water: (density, solubility, etc.). Include on a separate sheet if list is extensive Not determined

3.0 Implementation of the Assessment Program

3.1 Has the extent of the migration of hazardous waste or hazardous waste constituents been determined? (Y/N) N

If yes,

3.1.1 Indicate how: (check appropriate method(s))

- additional ground-water monitoring wells
- geophysical methods
- computer simulation
- other, explain

3.2 Were monitoring wells installed? (Y/N) N

Wells were not installed as part of the assessment plan but as to comply with detection monitoring requirements only

If yes,

3.2.1 Record monitoring well/peizometer completion data on INFORMATION TABLE C-1.

3.2.2 Were well clusters (nests) used or were wells with multiple intake areas constructed? Give details

3.2.3 Show the numbers and locations of the additional wells/peizometers on a site map.

3.2.4 Are the locations of the wells/piezometers justified in view of the water table or potentiometric surface map? (Y/N)
Give details

INFORMATION TABLE C-1

N/A

	WELL NO.						
	GROUND ELEVATION						
	TOTAL DEPTH						
WELL CASING	TYPE MATERIAL						
	DIAMETER						
	LENGTH						
	STICK-UP						
	TOP ELEVATION						
	BOTTOM ELEVATION						
WELL SCREEN	DEPTH TOP/BOTTOM						
	TYPE MATERIAL						
	DIAMETER						
	LENGTH						
	SLOT SIZE						
	TOP ELEVATION						
	BOTTOM ELEVATION						
OPEN HOLE OR SAND/GRAVEL PACK	DEPTH TOP/BOTTOM						
	DIAMETER						
	LENGTH						
	TOP ELEVATION						
	BOTTOM ELEVATION						

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3.2.5 Are the depths of the monitoring wells/ piezometers justified due to the relative characteristics (e.g., densities) of the contaminants? (Y/N) N/A

Give details _____

3.2.6 List any other methods (e.g., soil sample analysis) used to document the extent of the contamination. (use separate sheet if necessary) _____

3.3 Has the rate of contaminant migration been determined? (Y/N) N

If yes, what is it and how was it determined? _____

3.3.1 Does the rate of migration differ for various contaminants? (Y/N) _____

Give details _____

3.3.2 If known, what is the cause (reason) of (for) this differential in migration rates? _____

ILD041550567
EPA IDENTIFICATION NUMBER

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS
TREATMENT, STORAGE, AND DISPOSAL FACILITIES
Form 1 - General Facility Standards

I. General Information:

(A) Facility Name: Union Oil

(B) Street: 135th St and New Avenue

(C) City: Lemont (D) State: Illinois (E) Zip Code: 60439

(F) Phone: 312 257-7761 (G) County: Will

(H) Operator: R. R. Runge

(I) Street: 135th St and New Avenue

(J) City: Lemont (K) State: Illinois (L) Zip Code: 60439

(M) Phone: 312 257-7761 (N) County: Will

(O) Owner: Union Oil Co of California - Chicago Refinery

(P) Street: 135th St and New Avenue

(Q) City: Lemont (R) State: Illinois (S) Zip Code: 60439

(T) Phone: 312 257-7761 (U) County: Will

(V) Type of Ownership: ____ Federal ____ Municipal X Private ____ State ____ County

(W) Date of Inspection: 11/19/80 (Q) Time of Inspection (From) 2:30pm (To) 4:10pm

(X) Weather Conditions: Sunny, mild

(Y) Person(s) Interviewed	Title	Telephone
Henry D. Haas	Supervisor, En. Services	312 257-7761
Leo Erchull	Environmental Spec	"

(Z) Inspection Participants	Title	Telephone
Gene Meyer	Chemist	
Tony Holosha	Envir. Engr.	353-2110
Erin Moran	Physical Scientist	886-6254
Brad Benning	Envir. Specialist	345-9780

II. Description of Site Activity

(A) X Generator (Form 2)

(B) X Transporter (Form 3)

(C) ____ Chemical, Physical and Biological Treatment (Form 4)

(D) X Storage (Form 5)

(E) ____ Landfill (Form 6)

(F) ____ Incineration (Form 7)

(G) X Land Treatment (Form 4)

(H) ____ Thermal Treatment (Form 7)

(I) Comments: _____

Supplemental forms (Listed in Parathesis) must be completed for each activity inspected. Attach all Supplemental forms to this report.

	Yes	No	Not Inspected	See Remark Number
(J) Has this facility Submitted a Part A Permit Application?	X			

I. GENERAL FACILITY STANDARDS

	Yes	No	Not Inspected	See Remark Number
(A) Has the Regional Administrator been notified regarding:				
1. Receipt of hazardous waste from a foreign source?		X		
2. Transfer of Ownership?		X		
(B) General Waste Analysis:				
1. Has the owner or operator obtained a detailed chemical and physical analysis of the waste?	X			
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?	X			
(C) Security - Do security measures include:				
1. 24-Hour Surveillance?	X			
2. Artificial or Natural Barrier Around Facility?	X			
3. Controlled Entry?	X			
4. Danger Sign(s) at Entrance?		X		
(D) Do Owner or Operator Inspections Include:				
1. Records of Malfunctions?				1
2. Records of Operator Error?	X			
3. Records of Discharges?				1
4. Inspection Schedule?	X			
5. Safety, Emergency Equipment?				1
6. Security Devices?				1
7. Operating and Structural Devices?	X			
8. Inspection Log?	X			

III. GENERAL FACILITY STANDARDS - Continued

	Yes	No	Not Inspected	See Remark Number
(E) Do Personnel Training Records Include:				
1. Job Titles?	X			
2. Description of Training?	X			
3. Records of Training?	X			
Is Personnel Training Completed within the Required Time Frame?	X			
(F) Are the Following Special Requirements for Ignitable, Reactive, or Incompatible Wastes Addressed?				
1. Special Handling?	X			4
2. No Smoking Signs?	X			4
3. Separation and Confinement?	X			4

IV. PREPAREDNESS AND PREVENTION

(A) Maintenance and Operation of Facility:				
1. Is there any evidence of fire, Explosion, or release of hazardous waste or hazardous waste constituent?				
(B) Does the Facility have the Following Equipment:				
1. Alarm System?				
2. Telephone or 2-Way Radios?	X			
3. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?	X			

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

Units: 15 million gal of water + Canal water

	Yes	No	Not Inspected	See Remark Number
5. If hazardous wastes accumulate on site, does the generator follow the following general facility standards?	X			
Do Personnel training records include:				
1. Job Titles?	X			
2. Description of Training?	X			
3. Records of Training?	X			
Is Personnel Training Completed within the Requried Time Frame?	X			
B. Prepardness and Prevention				
1. Maintenance and Operation of Facility:				
a. Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent?		X		
2. Does the Facility have the following equipment?				
a. Alarm system?	X			
b. Telephone or 2-Way Radios?	X			
c. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?	X			

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

Units: 15 million gallons of water plus pumped water from canal

	Yes	No	Not Inspected	See Remark Number
3. Testing and Maintenance of Emergency Equipment:				
a. Has the Owner or Operator established testing and Maintenance Procedures for Emergency Equipment	X			
b. Is emergency equipment Maintained in Operable Condition?	X			

	Yes	No	Not Inspected	See Remark Number
4. Has Owner/Operator Provided Immediate Access to Internal Alarms (if needed)?	X			
5. Is there adequate Aisle Space for unobstructed Movement?	X			
6. Are arrangements with local authorities included in the operating record?	X			
(C) Contingency Plan and Emergency Procedure				
1. Does the contingency plan contain the following:				
a. The actions facility personnel must take to comply with §264.51 and 261.56 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)	X			
b. Arrangements agreed to by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services, pursuant to §264.37?	X			
c. Names, addresses, and Phone numbers (office and Home) of all persons qualified to act as emergency coordinator.	X			
d. A list of all emergency equipment at the facility which include the location and physical description of each item on the list, and a brief outline of its capabilities?	X			
e. 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.	X			

III. MANIFEST

	Yes	No	Not Inspected	See Remark Number
(A) Are copies of the Manifest available?	X			
(B) Does the Manifest contain the following information:				
1. Manifest document number?	X			
2. Name, mailing address, telephone number, and EPA ID Number of Generator?	X			
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?	X			

IV. PRE-TRANSPORT REQUIREMENTS

(A) Is Generator Packaging waste in accordance with DOT Regulations?	X			
(B) Are waste packages marked and labeled in accordance with DOT Regulations concerning hazardous waste materials?	X			
(C) If required, are placards available to transporter?	X			

	Yes	No	Not Inspected	See Remark Number
(D) Pre-shipment Accumulation:				
1. Are containers marked with start of accumulation date?	X			
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?	X			
4. Are wastes stored in tanks managed according to the following:				
a. Are tanks used to store only those wastes which will not cause corrosion leakage or premature failure of the tank?	X			
b. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structures?	X			
c. Do continuous feed systems have a waste-feed cutoff?	X			
d. Are required daily and weekly inspections done?	X			
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 requi em nts?	X			
f. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR §265.17(b) apply)	X			

IL 004050367
EPA IDENTIFICATION NUMBER

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS
TREATMENT, STORAGE, AND DISPOSAL FACILITIES
Form 4 - Chemical, Physical and Biological Treatment/Land Treatment

I. General Information

(A) Facility Name: Union Oil

(B) Street: 135th St and New Avenue

(C) City: Lemont (D) State: Illinois (E) Zip Code 60439

(F) Phone: 312 257-7761 (G) County: Will

II. Chemical, Physical and Biological Treatment (Subpart Q)

	Yes	No	Not Inspected	See Remark Number
1. Is equipment used to treat only those wastes which will not cause leakage, corrosion, or premature failure?	X			
2. Is a continuously fed system equipped with a means of hazardous waste inflow stoppage or control (e.g., cut-off system)?				system is not continuous
3. Has the owner or operator addressed the waste analysis requirements of 265.402?	X			
4. Are inspection procedures followed according to 265.403?	X			
5. Are the special requirements fulfilled for ignitable or reactive wastes?	X			
6. Are incompatible wastes treated? (If yes, 265.17(b) applies.)		X		

III. Land Treatment (Subpart M)

	Yes	No	Not Inspected	See Remark Number
1. Is hazardous waste capable of biological or chemical degradation?	X			
2. Are run-off and run-on diverted from the facility or collected (Effective date: November 19, 1981)?	X			
3. Is waste analysis according to 265.273?	X			
4. If food chain crops are grown at the facility, has the owner or operator addressed the requirements of 265.276?				2
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?	X			
6. Does the unsaturated zone monitoring plan address the minimum information specified in 265.278?	X			
7. Are records kept regarding application dates and rates, quantities, and location of all hazardous waste placed in the facility?	X			
8. Are the special requirements fulfilled regarding land treatment of ignitable or reactive wastes?				1
9. Are incompatible wastes land treated? (If yes, 265.17(b) applies.)				1

	Yes	No	Not Inspected	See Remark Number
4. Has Owner/Operator Provided Immediate Access to Internal Alarms (if needed)?	X			
5. Is there adequate Aisle Space for unobstructed Movement?				
6. Are arrangements with local authorities included in the operating record?				

(C) Contingency Plan and Emergency Procedure 265 Subp D

	Yes	No	Not Inspected	See Remark Number
1. Does the contingency plan contain the following:				
a. 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)	X			
b. Arrangements agreed to by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services, pursuant to §265.37?	X			
c. Names, addresses, and Phone numbers (office and Home) of all persons qualified to act as emergency coordinator.	X			
d. A list of all emergency equipment at the facility which include the location and physical description of each item on the list, and a brief outline of its capabilities?	X			
e. 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.	X			

	Yes	No	Not Inspected	See Remark Number
5. If hazardous wastes accumulate on site, does the generator follow the following general facility standards?				
A. Do Personnel training records include:				
1. Job Titles?	X			
2. Description of Training?	X			
3. Records of Training?	X			
Is Personnel Training Completed within the Requried Time Frame?	X			
B. Prepardness and Prevention				
1. Maintenance and Operation of Facility:				
a. Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent?				
2. Does the Facility have the following equipment?				
a. Alarm system?	X			
b. Telephone or 2-Way Radios?	X			
c. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?	X			

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

Units: 15 million gal of water + Chicago Canal

3. Testing and Maintenance of Emergency Equipment:				
a. Has the Owner or Operator established testing and Maintenance Procedures for Emergency Equipment	X			
b. Is emergency equipment Maintained in Operable Condition?	X			

VII. MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING

	Yes	No	Not Inspected	See Remark Number
(A) Use of Manifest System				
1. Does the facility follow the procedures listed in §265.71 for processing each Manifest?	X			
2. Are records of past shipments retained for 3 years?				
(B) Does the owner or operator meet requirements regarding Manifest Discrepancies?	X			
(C) Operating Record				
Does the facility maintain an operating record at the site as required in §265.73?	X			
(D) Availability, Retention and Disposition of Records				
Are all records available at the site for inspection as required in §265.74?	X			

VIII. CLOSURE AND POST CLOSURE

	Yes	No	Not Inspected	See Remark Number
(A) Closure and Post Closure				
1. Closure Plan Available for Inspection by May 19, 1981?				
2. Has this plan been submitted to the Regional Administrator?				
3. Has Closure begun?				
4. Is closure cost estimate available by May 19, 1981?				
(B) Post Closure Care and Use of Property - Has the Owner or Operator supplied a Post Closure Monitoring Plan (by May 19, 1981)?				

11/6/80

	Yes	No	Not Inspected	See Remark Number
2. Are copies of the Contingency Plan available at site and local Emergency Organizations?	X			
3. Emergency Coordinator				
a. Is the Facility Emergency Coordinator Identified?	X			
b. Is Coordinator Familiar with all aspects of site operation and Emergency Procedures?	X			
c. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	X			
4. Emergency Procedures				
If an Emergency Situation has occurred at this facility; has the Emergency Coordinator followed the Emergency Procedures listed in §256.56?	X			

V. RECORDKEEPING

(A) Are Manifests, Annual Reports, Exception Reports, and All Test Results and Analyses Retained for at least three years?	X			

VI. INTERNATIONAL SHIPMENTS

(A) Has the Installation Imported or Exported Hazardous Waste?		X		

(If A was answered Yes, then complete one or both of the following)

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?				

	Yes	No	Not Inspected	See Remark Number
c. Met the Manifest requirements?				
2. Importing Hazardous Waste, has the generator:				
a. Met the manifest requirements?				

VII. PREPARER INFORMATION

Name: Eugene Meyer, Anthony Holoska

Title: Chemist Envir Engr

Phone Number:

REMARKS:

Notes:

1. Not applicable.

2. Don't grow food crops on the land treatment facility.

ILD004155067
EPA IDENTIFICATION NUMBER

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS
SUPPLEMENTAL FORM 5 FOR STORAGE FACILITY INSPECTIONS

I. General Information

(A) Facility Name: Union Oil

(B) Street: New Avenue and 135th St.

(C) City: Lemont (D) State: Ill (E) ZIP Code 60441

(F) Date of Inspection: 11/19/80

II. Storage Facility Standards (Part 265)

A. Facilities which store containers of hazardous waste (Subpart I) None present

	YES	NO	NOT INSPECTED	REMARK #
1. Are containers in good condition?				
2. Are containers compatible with waste in them?				
3. Are containers stored closed?				
4. Are containers managed to prevent leaks?				
5. Are containers inspected weekly for leaks and defects?				
6. Are ignitable & reactive wastes stored at least 15 meters (50 feet) from the facility property line?				
7. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply.)				
8. Are containers of incompatible wastes separated or protected from each other physical barriers or sufficient distance?				

B. Facilities which store hazardous waste in tanks (Subpart J) No

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?				

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	YES	NO	NOT IN-SPECTED	REMARK #
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? (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.)				
C. Facilities which store hazardous waste in surface impoundments (Subpart K)				
1. Do surface impoundments have at least 60 cm (2 feet) of freeboard?	X			
2. Do earthen dikes have protective cover?	X			
3. Are waste analyses done when the impoundment is used to store a substantially different waste than before?	X			
4. Is the freeboard level inspected at least daily?	X			
5. Are the dikes inspected weekly for evidence of leaks or deterioration?	X			
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.)				Not applicable
7. Are incompatible wastes stored in different impoundments? (If not, the provisions of 40 CFR 265.17(b) apply.)				Not applicable
D. Facilities which store hazardous waste in waste piles (Subpart L) No				
1. Are waste piles covered or protected from the 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? (The effective date of this provision is Nov. 19, 1980.)				
4. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a pile? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)				

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	YES	NO	NOT IN-SPECTED	REMARK #
5. Are piles of reactive or ignitable waste protected?				
6. Are incompatible wastes stored in different piles? (If not, the provisions of 40 CFR 265.17(b) apply.)				
7. Are piles of incompatible waste protected by barriers or distance from other waste?				