# TSD File Inventory Index

Date February 14, 2005

Initial C M Kenevas

| | |
|---|---|
| Facility Name | Premcor Refining Group Incorporated |
| Facility Identification Number | ILD 041 889 023 |

| | | | |
|---|---|---|---|
| A.1 General Correspondence | | B.2 Permit Docket (B.1.2) | |
| A.2 Part A / Interim Status<br>A.2 | 1 | 1 Correspondence | |
| 1 Correspondence | | 2 All Other Permitting Documents (Not Part of the ARA) | |
| 2 Notification and Acknowledgment | Y | C.1 Compliance - (Inspection Reports)<br>See C.2 | |
| 3 Part A Application and Amendments | Y | C.2 Compliance/Enforcement<br>C.2 | 1 |
| 4 Financial Insurance (Sudden, Non Sudden) | | 1 Land Disposal Restriction Notifications | |
| 5 Change Under Interim Status Requests | | 2 Import/Export Notifications | |
| 6 Annual and Biennial Reports | | C.3 FOIA Exemptions - Non-Releasable Documents<br>C.3 | 1 |
| A.3 Groundwater Monitoring | | D.1 Corrective Action/Facility Assessment | |
| 1 Correspondence | | 1 RFA Correspondence | |
| 2 Reports<br>A.3.4 | 1 | 2 Background Reports, Supporting Docs and Studies | |
| A.4 Closure/Post Closure | | 3 State Prelim Investigation Memos | |
| 1 Correspondence<br>A.4.1 | 1 | 4 RFA Reports<br>D.1.4 | 1 |
| 2 Closure/Post Closure Plans Certificates etc | | D. 2 Corrective Action/Facility Investigation | |
| A.5 Ambient Air Monitoring | | 1 RFI Correspondence | |
| 1 Correspondence | | 2 RFI Workplan | |
| 2 Reports | | 3 RFI Program Reports and Oversight | |
| B.1 Administrative Record | | 4 RFI Draft /Final Report | |

Total - 8

| | | | |
|---|---|---|---|
| 5 RFI QAPP | | 7 Lab data Soil Sampling/Groundwater | |
| 6 RFI QAPP Correspondence | | 8 Progress Reports | |
| 7 Lab Data Soil-Sampling/Groundwater D.27 | / | **D.5 Corrective Action/Enforcement** | |
| 8 RFI Progress Reports | | 1 Administrative Record 3008(h) Order | |
| 9 Interim Measures Correspondence | | 2 Other Non-AR Documents | |
| 10 Interim Measures Workplan and Reports | | **D.6 Environmental Indicator Determinations** | |
| **D.3 Corrective Action/Remediation Study** | | 1 Forms/Checklists | |
| 1 CMS Correspondence | | **E. Boilers and Industrial Furnaces (BIF)** | |
| .2 Interim Measures | | 1 Correspondence | |
| 3 CMS Workplan | | .2 Reports | |
| 4 CMS Draft/Final Report | | **F Imagery/Special Studies** (Videos, photos, disks, maps, blueprints, drawings, and other special materials.) | |
| .5 Stabilization | | **G.1 Risk Assessment** | |
| .6 CMS Progress Reports | | .1 Human/Ecological Assessment | |
| 7 Lab Data, Soil-Sampling/Groundwater | | .2 Compliance and Enforcement | |
| **D.4 Corrective Action Remediation Implementation** | | .3 Enforcement Confidential | |
| 1 CMI Correspondence | | 4 Ecological - Administrative Record | |
| 2 CMI Workplan | | 5 Permitting | |
| 3 CMI Program Reports and Oversight | | 6 Corrective Action Remediation Study | |
| 4 CMI Draft/Final Reports | | 7 Corrective Action/Remediation Implementation | |
| 5 CMI QAPP | | 8 Endangered Species Act | |
| 6 CMI Correspondence | | 9 Environmental Justice | |
| | | | |

Note Transmittal Letter to Be Included with Reports

Comments _____

State of Illinois
ENVIRONMENTAL PROTECTION AGENCY

Mary A. Gade, Director

2200 Churchill Road, Springfield, IL 62794-9276

217/785-8604

December 14, 1995

Clark Refining and Marketing, Inc.
Attn: Forrest B. Lauher, Assistant Vice President
201 East Hawthorne
Post Office Box 7
Hartford, Illinois 62048-0007

Re: 1190500002 -- Madison County
Clark Refining and Marketing, Inc.
ILD041889023
Compliance File

Dear Mr. Lauher:

On October 31, 1995, your facility was inspected by Chris Cahnovsky of the Illinois Environmental Protection Agency. The purpose of this follow-up inspection was to determine your facility's compliance status with respect to the apparent violations cited in the August 25, 1995 Pre-Enforcement Conference Letter. During the inspection, it was determined that you have returned to compliance for the apparent violation of Section 722.134(a) as cited during the June 30, 1993 Compliance Evaluation Inspection (CEI).

Please note, although you have returned to compliance for this apparent violation, the Agency reserves the right to pursue further enforcement.

For your information a copy of the inspection report is enclosed. Should you have any questions regarding the inspection, please contact Chris Cahnovsky at 618/346-5120.

Sincerely,

Glenn D. Savage

Glenn D. Savage, Manager
Field Operations Section
Division of Land Pollution Control
Bureau of Land

GDS:CNC:pg

Enclosure

cc: Mike Ribordy-USEPA Region V
Jim Morgan-Ill. Att. Gen. Office

Printed on Recycled Paper

State of Illinois
ENVIRONMENTAL PROTECTION AGENCY

Mary A. Gade, Director

2200 Churchill Road, Springfield, IL 62794-9276

217/785-8604

December 14, 1995

Clark Refining and Marketing, Inc.
Attn: Forrest B. Lauher, Assistant Vice President
201 East Hawthorne
Post Office Box 7
Hartford, Illinois 62048-0007

Re: 1190500002 -- Madison County
Clark Refining and Marketing, Inc.
ILD041889023
Compliance File

Dear Mr. Lauher:

The Agency is in receipt of your November 9, 1995 response to the August 25, 1995 Pre-Enforcement Conference Letter. Based upon a review of your response, the Agency has determined that you have returned to compliance for the apparent violation of Section 722.134(a).

Please note, although you have returned to compliance for this apparent violation, the Agency reserves the right to pursue further enforcement.

If you have any questions regarding the above matter, please contact Chris Cahnovsky at 618/346-5120.

Sincerely,

Glenn D. Savage, Manager
Field Operations Section
Division of Land Pollution Control
Bureau of Land

GDS:CNC:pg

cc: Mike Ribordy-USEPA Region V
Jim Morgan-Ill. Att. Gen. Office

Printed on Recycled Paper

c copy
cc RARK
ctr mg

CLARK

REFINING & MARKETING, INC.

201 East Hawthorne P.O. Box 7
Hartford, Illinois 62048-0007
*ph* 618-254-7301 *fx* 618-254-6064

November 15, 1995

RECEIVED

NOV 20 1995

U. S. EPA REGION 5
OFFICE OF REGIONAL ADMINISTRATOR

Regional Administrator
US Environmental Protection Agency
Region V
77 W. Jackson
Chicago, IL 60604

Dear Sir:

During the recent inspection of our records of 1995 manifests, we discovered three manifests where original copies were missing.

We contacted the facility, EureCat U.S.A., Inc. in Pasadena, Texas, to investigate the reason for not receiving the copies. The EureCat company representative confirmed receipt of the waste, and faxed a copy of the missing manifests to us on November 14, 1995.

A copy of these three manifests is attached.

This report is being done in accordance with 40 CFR, Subpart D, paragraph 262.42(2).

Sincerely,

M. Modarres

Massood Modarres
Environmental Engineer

CLARK

TEXAS WATER COMMISSION
P.O. Box 13087, Capitol Station
Austin, Texas 78711-3087

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

WO-669265
4377# 548786#

Form approved. OMB No. 2050-0039, expires 09-30-91

**UNIFORM HAZARDOUS WASTE MANIFEST**

1. Generator's US EPA ID No.: ILD041889023
Manifest Document No.: 95089
2. Page 1 of 1
Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
Clark Refining and Marketing, Inc.
201 East Hawthorne, Hartford, IL 62048
4. Generator's Phone ( 618 ) 254-7301

A. State Manifest Document Number: 00200555
B. State Generator's ID: [illegible]
C. State Transporter's ID: [illegible]
D. Transporter's Phone: [illegible]
E. State Transporter's ID: [illegible]
F. Transporter's Phone: [illegible]
G. State Facility's ID: [illegible]
H. Facility's Phone: [illegible]

5. Transporter 1 Company Name: Tri-State Motor Transit Co.
6. US EPA ID Number: MOD095038998
7. Transporter 2 Company Name:
8. US EPA ID Number:
9. Designated Facility Name and Site Address
EureCat U.S.A., Inc.
13100 Bay Park Rd.
Pasadena, TX 77507
10. US EPA ID Number: TXD106829963

| 11A. HM | 11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID Number) | 12. Containers No. | Type | 13. Total Quantity | 14. Unit Wt/Vol | I. Waste No. |
|---|---|---|---|---|---|---|
| | a. RQ Waste Flammable solid, N.O.S. (Benzene), 4.1, UN1325, PgII (D001,D018) | 57 | DM | 24260 | P | D001 D018 |
| | b. | | | | | |
| | c. | | | | | |
| | d. | | | | | |

J. Additional Descriptions for Materials Listed Above
AKZO KR-742 catalyst
SKG-32

K. Handling Codes for Wastes Listed Above
H039 other recovery
type unknown

15. Special Handling Instructions and Additional Information
Emergency Number: 800-424-9300
Emergency Number: 713-474-2600
material for regeneration, not for disposal

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations, including applicable state regulations.
If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: MASSOUD MODARRES
Signature: M. Modarres
Month Day Year: 06 16 95

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: Grover Stacey
Signature: Grover Stacey
Month Day Year: 06 16 95

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name:
Signature:
Month Day Year:

19. Discrepancy Indication Space

FACILITY

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: Hirschel McMillan
Signature:
Month Day Year: 6 19 95

TWO-0311 (Rev. 01/01/89) White - original Pink-TSD Facility Yellow-Transporter Green-Generator's first copy

TEXAS WATER COMMISSION
P.O. Box 13087, Capitol Station
Austin, Texas 78711-3087

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

TRL 548732
WO# 66976
66976

Form approved. OMB No. 2050-0039, expires 09-30-91

**UNIFORM HAZARDOUS WASTE MANIFEST**

1. Generator's US EPA ID No. ILD041889023 — Manifest Document No. 938874
2. Page 1 of 1
Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
Clark Refining and Marketing, Inc.
201 East Hawthorne St., Hartford, IL 62043

4. Generator's Phone (618) 254-7301

A. State Manifest Document Number: 10020056 7
B. State Generator's ID: 1105006
C. State Transporter's ID: 4
D. Transporter's Phone: 800-
E. State Transporter's ID:
F. Transporter's Phone:
G. State Facility's ID: 34750
H. Facility's Phone: 713-474-2600

5. Transporter 1 Company Name: Tri-State Motor Transit Co.
6. US EPA ID Number: MOD095038998
7. Transporter 2 Company Name:
8. US EPA ID Number:

9. Designated Facility Name and Site Address
EureCat U.S.A., Inc.
13100 Bay Park Road
Pasadena, TX 77507
10. US EPA ID Number: TXD106829963

| 11A. HM | 11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID Number) | 12. Containers No. | Type | 13. Total Quantity | 14. Unit Wt/Vol | |
|---|---|---|---|---|---|---|
| X | a. RQ Waste flammable solid, N.O.S. (Benzene), 4.1, UN1325, PgII (D001, D018) | 088 | DM | 37,520 | P | D001 D018 |
| | b. | | | | | |
| | c. | | | | | |
| | d. | | | | | |

J. Additional Descriptions for Materials Listed Above
AKZO KF-742 catalyst
ERG 32

K. Handling Codes for Wastes Listed Above
H-089 other recovery
type unknown

15. Special Handling Instructions and Additional Information
Emergency number: 800-424-9300
Emergency number: 713-474-2600
material for regeneration not for disposal

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations, including applicable state regulations.
If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: MASSOUD MADARRES — Signature: M. Madarres — Month Day Year: 06 15 95

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials — Date
Printed/Typed Name: FD WALKER III — Signature: FD Walker III — Month Day Year: 06 15 95

18. Transporter 2 Acknowledgement of Receipt of Materials — Date
Printed/Typed Name: — Signature: — Month Day Year:

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19. — Date
Printed/Typed Name: Horsche McMullan — Signature: [illegible] — Month Day Year: 6 19 95

TWC-0311 (Rev. 01/01/89) White - original Pink-TSD Facility Yellow-Transporter Green-Generator's first copy

TEXAS WATER COMMISSION
P.O. Box 13087, Capitol Station
Austin, Texas 78711-3087

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form approved. OMB No. 2050-0039, expires 09-30-91

# UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: ILD041889023
Manifest Document No.: 95088
2. Page 1 of 1
Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
Clark Refining and Marketing, Inc.
201 East Hawthorne St., Hartford IL 62048

4. Generator's Phone ( 618 ) 254-7301

A. State Manifest Document Number: 00200568
B. State Generator's ID: 1190500002
C. State Transporter's ID: 40355
D. Transporter's Phone: 800-254-8768
E. State Transporter's ID:
F. Transporter's Phone:
G. State Facility's ID: 34730
H. Facility's Phone: 713-474-2600

5. Transporter 1 Company Name: Tri-State Motor Transit Co.
6. US EPA ID Number: MOD095038998

7. Transporter 2 Company Name:
8. US EPA ID Number:

9. Designated Facility Name and Site Address
EureCat U.S.A., Inc.
13100 Bay Park Road
Pasadena, TX 77507

10. US EPA ID Number: TXD106829963

| 11A. HM | 11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID Number) | 12. Containers No. | Type | 13. Total Quantity | 14. Unit Wt/Vol | 15. Waste No. |
|---|---|---|---|---|---|---|
| | a. RQ Waste flammable solid, N.O.S. (Benzene), 4.1, UN1325, PgII (D001, D018) | 0.64 | DM | 27080 | P | D001 D018 |
| | b. | | | | | |
| | c. | | | | | |
| | d. | | | | | |

J. Additional Descriptions for Materials Listed Above
AKZO KF-742 catalyst
ERG 32

K. Handling Codes for Wastes Listed Above
M039 other recovery type unknown

15. Special Handling Instructions and Additional Information
Emergency number: 800-424-9300
Emergency number: 713-474-2600
material for regeneration
not for disposal

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations, including applicable state regulations.
If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: MASSOOD MODARRES
Signature: [signature]
Month Day Year: 06 15 95

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: Stephen J. DAVIS
Signature: Stephen J Davis
Date: Month Day Year: 06 15 95

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name:
Signature:
Date: Month Day Year:

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: Terry Hefner
Signature: [signature]
Date: Month Day Year: 6 16 95

GENERATOR / TRANSPORTER / FACILITY

TWC-0311 (Rev. 01/01/89) White - original Pink-TSD Facility Yellow-Transporter Green-Generator's first copy

TOTAL P.06

State of Illinois
ENVIRONMENTAL PROTECTION AGENCY

Mary A. Gade, Director

2200 Churchill Road, Springfield, IL 62794-9276

217/785-8604

November 8, 1995

Clark Refining and Marketing, Inc.
Attn: Forrest B. Lauher, Assistant Vice President
201 East Hawthorne
Post Office Box 7
Hartford, Illinois 62048-0007

Re: 1190500002 -- Madison County
Clark Refining and Marketing, Inc.
ILD041889023
Compliance File

Dear Mr. Lauher:

The Agency is in receipt of your November 1, 1995 response to the August 25, 1995 Pre-Enforcement Conference Letter. Based upon a review of your response, the Agency has determined that you have returned to compliance for apparent violation of Section 722.141(a).

Please note, although you have returned to compliance for this apparent violation, the Agency reserves the right to pursue further enforcement.

If you have any questions regarding the above matter, please contact Chris Cahnovsky at 618/346-5120.

Sincerely,

Glenn D. Savage, Manager
Field Operations Section
Division of Land Pollution Control
Bureau of Land

GDS:CNC:pg

cc: Mike Ribordy-USEPA Region V
Jim Morgan-Ill. Att. Gen. Office

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State of Illinois
ENVIRONMENTAL PROTECTION AGENCY

Mary A. Gade, Director

2200 Churchill Road, Springfield, IL 62794-9276

217/785-8604

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NOV 21 1995
OFFICE OF RCRA
WASTE MANAGEMENT DIVISION
EPA, REGION V

November 6, 1995

Clark Refining and Marketing, Inc.
Attn: Forrest B. Lauher, Assistant Vice President
201 East Hawthorne
Post Office Box 7
Hartford, Illinois 62048-0007

Re: 1190500002 -- Madison County
Clark Refining and Marketing, Inc.
ILD041889023
Compliance File

Dear Mr. Hawthorne:

On October 16, 1995, your facility was inspected by Chris Cahnovsky of the Illinois Environmental Protection Agency. The purpose of this follow-up inspection was to determine your facility's compliance status with respect to the apparent violations cited in the August 25, 1995 Pre-Enforcement Conference Letter. During the inspection, it was determined that you have returned to compliance for the apparent violations of Sections 722.111 and 722.134(c).

Please note, although you have returned to compliance for these apparent violations, the Agency reserves the right to pursue further enforcement.

For your information a copy of the inspection report is enclosed. Should you have any questions regarding the inspection, please contact Chris Cahnovsky at 618/346-5120.

Sincerely,

Glenn D. Savage

Glenn D. Savage, Manager
Field Operations Section
Division of Land Pollution Control
Bureau of Land

GDS:CNC:pg

Enclosure

cc: Mike Ribordy-USEPA Region V
Jim MOrgan- Ill. Att. Gen. Office

State of Illinois
ENVIRONMENTAL PROTECTION AGENCY

Mary A. Gade, Director

2009 Mall Street, Collinsville, IL 62234

618/346-5120

Refer to: 1190500002 - Madison County
Clark Refining and Marketing, Inc.
ILD041889023
Compliance

September 22, 1995

Clark Refining and Marketing, Inc.
Attn: Forrest B. Lauher, Assistant Vice President
201 East Hawthorne, Post Office Box 7
Hartford, Illinois 62048-0007

Dear Mr. Lauher:

On September 21, 1995, a Pre-Enforcement Conference (PEC) was held at the Collinsville Regional Office. This conference was held pursuant to the apparent violation(s) previously identified by the Agency in the Pre-Enforcement Conference Letter dated August 25, 1995. The purpose of this conference was 1) to discuss the validity of the apparent violation(s) noted by the Agency staff, and 2) to arrive at a program to eliminate existing and/or future violation(s).

At the PEC, you agreed to take the following steps toward achieving compliance with the identified violation(s):

1) Submit a corrected copy of the Hazardous Waste Report for 1994 to the Illinois Environmental Protection Agency's (Agency) Planning and Reporting Section. Retain a copy and all revisions of the 1994 Hazardous Waste Report at the Hartford Refinery and provide a copy of this report to the Agency on October 31, 1995;

2) Provide a copy of the revised sections of the Hartford Refinery's RCRA Contingency Plan to the Agency on October 31, 1995;

3) Participate in an Agency Follow-Up Inspection of the Hartford Refinery on October 31, 1995;

4) Prepare and conduct a reassessment by an independent professional engineer of the Number 4 Agitator Tank. This assessment should include but not be limited to waste characterization and removal of the nine to ten feet of waste in the bottom of Tank 4, an internal inspection of Tank 4 and possible corrosion repair;

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SEP 28 1995
OFFICE OF RCRA
WASTE MANAGEMENT DIVISION
EPA, REGION V



5) Submit engineering plan and profile drawings of the Number 5 Lift Station;

6) Submit documentation on the schedule of the cleaning of the Number 5 Lift Station;

7) Submit documentation on the deposition of solids from the Number 5 Lift Station, this includes all records for injection into the Coker and off-site shipments; and

8) Complete construction and instillation of the Number 5 Lift Station Valve Project.

Submit written concurrence with the above compliance steps and any documentation that is available within 10 days of the receipt of this letter. Two copies of all documents submitted in response to this letter should be sent to:

Illinois Environmental Protection Agency
Bureau of Land
2009 Mall Street
Collinsville, Illinois 62223

Further, take notice that non-compliance with the requirements of the Illinois Environmental Protection Act and rules and regulations adopted thereunder may be the subject of enforcement action pursuant to either the Illinois Environmental Protection Act, 415 ILCS 5/1 et seq. or the federal Resource Conservation and Recovery Act (RCRA), 42 U.S.C. Sec. 6901 et seq. Although you have agreed to submit the above information and undertake certain activities, the Agency reserves the right to pursue further enforcement as well as the pending enforcement actions.

Should you have any questions concerning this letter or need further assistance, contact Chris Cahnovsky at 618/346-5120.

Sincerely,

ENVIRONMENTAL PROTECTION AGENCY

Kenneth G. Mensing

Kenneth G. Mensing
Regional Manager
Division of Land Pollution Control

KGM:CNC:jlr/CLARK.PEC

cc: Jim Morgan - IAGO
cc: Mike Ribordy - USEPA

State of Illinois
ENVIRONMENTAL PROTECTION AGENCY

Mary A. Gade, Director

2200 Churchill Road, Springfield, IL 62794-9276

217/785-8604

CERTIFIED MAIL
Z422918493

August 25, 1995

RECEIVED
AUG 28 1995
OFFICE OF RCRA
WASTE MANAGEMENT DIVISION
EPA, REGION V

Clark Refining and Marketing, Inc.
Attn: Forrest B. Lauher - Asst. Vice President
201 East Hawthorne
Post Office Box 7
Hartford, Illinois 62048-0007

Re: PRE-ENFORCEMENT CONFERENCE LETTER
1190500002 -- Madison County
Clark Refining and Marketing, Inc.
ILD041889023
Compliance File

Dear Mr. Lauher:

The Agency has previously informed Clark Refining and Marketing, Inc. of apparent violations of the [Illinois] Environmental Protection Act and/or rules adopted thereunder. These apparent violations are set forth in Attachment A of this letter.

Also, by copy of this letter the Agency hereby informs Clark Refining and Marketing, Inc. of an additional apparent violation. This apparent violation is based on an inspection conducted by Jeff Benbenek (IEPA Bureau of Air) on June 27, 1995 and on an inspection conducted by Chris Cahnovsky (IEPA Bureau of Land) on August 9, 1995. This apparent violation is addressed in Attachment B. A copy of the August 9, 1995 inspection report is enclosed with this letter.

As a result of these apparent violations, it is our intent to refer this matter to the Agency's legal staff for the preparation of a formal enforcement case. The Agency's legal staff will, in turn, refer this matter to the Office of the Attorney General or the United States Environmental Protection Agency for the filing of a formal complaint.

Prior to taking such action, however, you are requested to attend a Pre-Enforcement Conference to be held at the Illinois Environmental Protection Agency's Collinsville Regional Office, 2009 Mall Street, Collinsville, Illinois. The purpose of this conference will be:

1. To discuss the validity of the apparent violations noted by the Agency staff, and

2. To arrive at a program to eliminate existing and/or future violations.

You should, therefore, bring such personnel and records to the conference as will enable a complete discussion of the above items. We have scheduled the conference for September 14, 1995 at 10:00 a.m. If this arrangement is inconvenient, you may arrange for an alternative date and time.

In addition, please be advised that this letter constitutes the notice required by Section 31(d) of the [Illinois] Environmental Protection Act prior to the filing of a formal complaint. The cited Section of the [Illinois] Environmental Protection Act requires the Agency to inform you of the charges which are to be alleged and offer you the opportunity to meet with appropriate officials within thirty days of this notice date in an effort to resolve such conflict which could lead to the filing of a formal action.

If either the above mentioned conference date or time is inconvenient or if you have any questions regarding this letter, please contact Chris Cahnovsky at 618/346-5120.

Sincerely,

Glenn D. Savage Jr.

Glenn D. Savage, Jr., Manager
Field Operations Section
Division of Land Pollution Control
Bureau of Land

GDS:CC:pg

Attachment

cc: Mike Ribordy - USEPA Region V
Jim Morgan - Ill. Att. Gen. Office

Attachment A

1. Pursuant to 35 Ill. Adm. Code 722.111, a person who generates a solid waste as defined in Section 721.102, must determine if that waste is a hazardous waste using the following method:

   a. He should first determine if the waste is excluded from regulation under Section 721.104.

   b. He must then determine if the waste is listed as a hazardous waste in Subpart D of Part 721.

   Note: Even if a waste is listed, the generator still has an opportunity under Section 720.122 and 40 CFR Section 260.22 to demonstrate that the waste from his particular facility or operation is not a hazardous waste.

   c. If the waste is not listed as a hazardous waste in Subpart D of Part 721, he must determine whether the waste is identified in Subpart C of Part 721 by either:

      1. Testing the waste according to the methods set forth in Subpart C of Part 721, or according to an equivalent method approved by the Board under Section 720.121; or

      2. Applying knowledge of the hazard characteristic of the waste in light of the materials or the processes used.

   You are in apparent violation of Section 722.111 for the following reason(s): You failed to determine if the oil and oily wastewater in the earthen ditch between the Number 5 Lift Station and the Oil Separator is a hazardous waste.

   NOTE: The Agency would like to split samples with Clark when they attempt to make a waste determination.

2. Pursuant to 35 Ill. Adm. Code 722.134(a), except as provided in subsections (d), (e) or (f), a generator may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status provided that:

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

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

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

d. The generator complies with the requirements for owners or operators in 35 Ill. Adm. Code 725 Subparts C [Preparedness and Prevention] and D [Contingency Plan and Emergency Procedures] and with 35 Ill. Adm. Code 725.116 [Personnel Training] and 728.107(a)(4).

You are in apparent violation of 35 Ill. Adm. Code 722.134(a) in that item(s) 1, 2, 3 and 4 above were not complied with.

Specifically, the requirements of item 1 and/or 4 above (listed by regulation) which were not complied with, as well as the deficiencies observed, are:

A. Pursuant to 35 Ill. Adm. Code 725.131, facilities must be maintained and operated to minimize the possibility of a fire, explosion or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil or surface water which could threaten human health or the environment. You are in apparent violation of 35 Ill. Adm. Code 725.131 for the following reason(s): Oil and oily wastewater was observed in an earthen ditch between Lift Station Number 5 and the Oil Separator and the oil and oily wastewater was observed on the ground around the Oil Separator.

NOTE: This apparent violation remains outstanding from the June 30, 1993 CEI.

B. Pursuant to 35 Ill. Adm. Code 725.152(e), the contingency plan must include an up-to-date list of all emergency equipment at the facility. The plan must include the location and a physical description of each item and a brief outline of its capabilities. You are in apparent violation of 35 Ill. Adm. Code 725.152(e) for the following reason(s): You failed to include an updated list of emergency equipment in the Facility's Contingency Plan.

C. Pursuant to 35 Ill. Adm. Code 725.211, the owner or operator shall close the facility in a manner that:

a) Minimizes the need for further maintenance; and

b) Controls, minimizes or eliminates, to the extent necessary to protect human health and the environment, post-closure escape of hazardous waste, hazardous constituents, leachate, contaminated run-off or hazardous waste decomposition products to the ground or surface waters or to the atmosphere, and

c) Complies with the closure requirements of this Part, including, but not limited to, the requirements of Sections 725.297, 725.328, 725.358, 725.380, 725.410, 725.451, 725.481 and 725.504.

You are in apparent violation of 35 Ill. Adm. Code 725.211 for the following reason(s): You failed to conduct generator closure of Tank V46.

D. Pursuant to 35 Ill. Adm. Code 725.214, during the partial and final closure periods, all contaminated equipment, structures and soils must be properly disposed of, or decontaminated, unless specified otherwise in Sections 725.328, 725.358, 725.380 or 725.410. By removing all hazardous wastes or hazardous constituents during partial and final closure, the owner or operator may become a generator of hazardous waste and shall handle that hazardous waste in accordance with all applicable requirements of 35 Ill. Adm. Code 722.

You are in apparent violation of 35 Ill. Adm. Code 725.214 for the following reason(s): You failed to conduct generator closure of Tank V46.

E. Pursuant to 35 Ill. Adm. Code 725.271, if a container holding hazardous waste is not in good condition or if it begins to leak, the owner or operator must transfer the hazardous waste from this container to a container that is in good condition or manage the waste in some other way that it complies with the requirements of this Part. You are in apparent violation of 35 Ill. Adm. Code 725.271 for the following reason(s): The top of a 55-gallon drum of waste alcohol (D001) on the Drum Accumulation Pad was observed bulging.

F. Pursuant to 35 Ill. Adm. Code 725.274, the owner or operator must inspect areas where containers are stored at least weekly, looking for leaks and for deterioration caused by corrosion or other factors. You are in apparent violation of 35 Ill. Adm. Code 725.274 for the following reason(s): You failed to conduct adequate weekly inspections of the Drum Accumulation Pad. You failed to note a bulging drum of waste alcohol (D001) on your weekly container inspection records.

G. Pursuant to 35 Ill. Adm. Code 725.294:

a. Hazardous wastes or treatment reagents must not be placed in a tank system if they could cause the tank, its ancillary equipment or the secondary containment system to rupture, leak, corrode or otherwise fail.

b. The owner or operator shall use appropriate controls and practices to prevent spills and overflows from tank or secondary containment systems. These include at a minimum:

1. Spill prevention controls (e.g. check valves, dry disconnect couplings);

2. Overfill prevention controls (e.g., level sensing devices, high level alarms, automatic feed cutoff or bypass to a standby tank); and

3. Maintenance of sufficient freeboard in uncovered tanks to prevent overtopping by wave or wind action or by precipitation.

c. The owner or operator shall comply with the requirements of Section 725.296 if a leak or spill occurs in the tank system.

You are in apparent violation of 35 Ill. Adm. Code 725.294 for the following reason(s): You have placed hazardous waste (K048) in a tank system, which has been found to be of questionable integrity by an independent registered professional engineer.

H. Pursuant to 35 Ill. Adm. Code 725.297(a), at closure of a tank system, the owner or operator shall remove or decontaminate all waste residues, contaminated tank system components, contaminated soils and structures and equipment contaminated with waste, and manage them as a hazardous waste, unless 35 Ill. Adm. Code 721.103(d) applies. You are in apparent violation of 35 Ill. Adm. Code 725.297(a) for the following reason: You failed to conduct generator closure of Tank V46.

3. Pursuant to 35 Ill. Adm. Code 722.134(c):

1. A generator may accumulate as much as 55 gallons of hazardous waste or one quart of acutely hazardous waste listed in 35 Ill. Adm. Code 721.133(e) in containers at or near any point of generation where wastes initially accumulate, which is under the control of the operator of the process generating the waste, without a permit or interim status and without complying with paragraph (a) provided the generator:

A. Complies with 35 Ill. Adm. Code 725.271, 725.272 and 725.273(a) (Use and Management of Containers); and

B. marks the generator's containers either with the words "Hazardous Waste" or with other words that identify the contents of the containers.

2. A generator who accumulates either hazardous waste or acutely hazardous waste listed in 35 Ill. Adm. Code 721.133(e) in excess of the amounts listed in Subsection (c)(1) at or near any point of generation must, with respect to that amount of excess waste, comply within three days with Subsection (a) or other applicable provisions of this chapter. During the three day period the generator must continue to comply with Subsection (c)(1). The generator must mark the container holding the excess accumulation of hazardous waste with the date the excess amount began accumulating.

You are in apparent violation of 35 Ill. Adm. Code 722.134(c) for the following reason(s): You failed to properly label and close a 40-gallon satellite accumulation drum of K048 located at Tank 1433.

4. 35 Ill. Adm. Code 722.140(a) requires the generator to keep a copy of each manifest signed in accordance with Section 722.123(a) for three years or until he receives a signed copy from the designated facility which received the waste. This signed copy must be retained as a record for at least three years from the date the waste was accepted by the initial transporter. You are in apparent violation of this Section in that you failed to retain a signed copy of Illinois Manifest IL5500650.

5. Pursuant to 35 Ill. Adm. Code 722.141(a), a generator who ships any hazardous waste off-site to a treatment, storage or disposal facility within the United States shall prepare and submit a single copy of an annual report to the Agency by March 1 for the preceding calendar year. The annual report must be submitted on a form supplied by the Agency, and must cover generator activities during the previous calendar year, and must include the following information:

   1. The USEPA identification number, name and address of the generator;

   2. The calendar year covered by the report;

   3. The USEPA identification number, name and address for each off-site treatment, storage or disposal facility in the United States to which waste was shipped during the year;

   4. The name and USEPA identification number of each transporter used during the reporting year for shipments to a treatment, storage or disposal facility within the United States;

   5. A description, USEPA hazardous waste number (from 35 Ill. Adm. Code 721. Subpart C or D), DOT hazard class and quantity of each hazardous waste shipped off-site for shipments to a treatment, storage or disposal facility within the United States. This information must be listed by USEPA identification number of each off-site facility to which waste was shipped;

   6. A description of the efforts undertaken during the year to reduce the volume and toxicity of waste generated;

   7. A description of 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;

   8. The certification signed by the generator or the generator's authorized representative.

   You are in apparent violation of 35 Ill. Adm. Code 722.141(a) for the following reason(s): You failed to list all hazardous waste generated in 1994 on your 1994 Annual Report.

6. Pursuant to 35 Ill. Adm. Code 728.107(a)(7), generators shall retain on-site a copy of all notices, certifications, demonstrations, waste analysis data and other documentation produced pursuant to this Section for at least five years from the date that the waste that is the subject of such documentation was last sent to on-site or off-site treatment, storage or disposal. The five year record retention period is automatically extended during the course of any unresolved enforcement action regarding the regulated activity or as requested by the Agency.

   You are in apparent violation of 35 Ill. Adm. Code 728.107(a)(7) for the following reason(s): You failed to retain a copy of the Land Disposal Restriction Notification Form for Illinois Manifest IL4704915.

PG:dks/518x, 110-115

Attachment B

1. Pursuant to 35 Ill. Adm. Code 703.121(a), no person shall conduct any hazardous waste storage, hazardous waste treatment or hazardous waste disposal operation:

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

    2. In violation of any condition imposed by a RCRA permit.

    You are in apparent violation of 35 Ill. Adm. Code 703.121(a) for the following reason: You stored refinery primary oil/water/solids separation sludge (F037) in a surface impoundment (S04).

6/16/95

Requested reports #36 under RCRA.

These are the copies of letters sent to the agencies.

CLARK

REFINING & MARKETING, INC.

201 East Hawthorne
Hartford, Illinois 62048-0007
ph 618-254-7301 fx 618-254-6064

April 24, 1995

Mr. Charles W. Brutlag
Illinois Environmental Protection Agency
Emergency Response Unit, Mail Drop #29
P.O. Box 19276
2200 Churchill Road
Springfield, IL 62794-9276

**RE: Incident #950720 at Clark's Hartford, IL Dock**

Dear Mr. Brutlag:

I am writing to follow-up on a telephone notification that was received by your office in April. Clark Refining and Marketing reported a release of no. 2 diesel fuel at their Hartford, IL dock facility. The facility is located at milepost 197.3 along the Mississippi River. The release was due to a rupture of a 10" line at the dock. The United States Coast Guard, IEPA and the NRC were all notified of the release.

On April 11, 1995 at approximately 0700 a rupture occurred in a line leading down to the river dock. The pumps feeding the line were shut-down within a few seconds, which kept the release very small. A total of two barrels of diesel fuel was released with only 5 to 10 gallons reaching the river. Since the line was overhead, the wind blew some of the released product into the river. Clark personnel took a proactive approach to the release by deploying containment and absorbent boom into the river, while using absorbent pads to capture the product on the ground. The boom was utilized for about 36 hours then removed from the river. Approximately 10 cubic yards of impacted soil was removed and properly disposed. Fresh gravel was laid in the area where the soil had been removed. All remediation activities were accomplished within 8 hours of the release. The used absorbent booms and soil were disposed of through Waste Management. No further remediation for this incident is planned at this time.

If you have any questions or comments regarding this report, I can be contacted at (618)254-7301 ext. 259.

Respectfully,

Johnna S. Van Keuren

Johnna S. Van Keuren
Environmental Manager - Terminals

00881

cc: A. Szabo, Hartford (RCM\Water\Agency & Interoff. Corres.)

jsvk3\hartsp1

CLARK

CLARK

REFINING & MARKETING, INC.

201 East Hawthorne P.O. Box 7
Hartford, Illinois 62048-0007
*ph* 618-254-7301 *fx* 618-254-6064

December 20, 1994

Illinois Environmental Protection Agency
Emergency Response Unit
2200 Churchill Road
Springfield, IL 62706

Re: Incident # 942837

Dear Mr. Dennis Ahlberg:

I am providing the following information to describe the spill incident reported to your office on Friday December 16, 1994 .

The reason for that spill was the overfill of the storage tank (tank 55-1) which has a holding capacity of 55000 barrels. The estimated spill is about 10-30 barrels. The spilled product is called Gasoil. The area effected is the dyked tank yard covering 200ft.x 100ft.. The product is being collected with the use of vacuum trucks provided by a contractor (Triad). All recovered Gasoil will be reprocessed in our Fluid Catalatic Cracking Unit. The recovered water will be treated at our WTTP.

The difference in the gravity between the water and the Gasoil helped to keep the product from coming in contact with the soil. This has helped us to expedite the clean-up.

Please let me know if I can be of any more assistance.

00882

Sincerely yours,

Massood Modarres
Environmental Engineer

CLARK

REFINING & MARKETING, INC.

201 East Hawthorne P.O. Box 7
Hartford, Illinois 62048-0007
ph 618-254-7301 fx 618-254-6064

December 20, 1994

Illinois Environmental Protection Agency
Emergency Response Unit
2200 Churchill Road
Springfield, IL 62706

Re: Incident # 942855

Dear Mr. Dennis Ahlberg:

I am providing the following information to describe the spill incident reported to your office on Tuesday, December 20, 1994

The cause for that spill was a rupture in a 10 inch above ground pipe. The estimated spill amount was about 42 gallons. The spilled product was crude oil, contained in the 200-1 tank yard. Clark vacuum truck removed the spill, and the product will be reprocessed in our crude unit. The contaminated soil will be Bio remediated.

Please let me know if I can be of any more assistance.

Sincerely yours,

Massood Modarres
Environmental Engineer

00883

CLARK

REFINING & MARKETING, INC.

201 East Hawthorne P.O. Box 7
Hartford, Illinois 62048-0007
ph 618-254-7301 fx 618-254-6064

FILE NUMBER 070.05
RETAIN IN FILE UNTIL 10/97

October, 19, 1994

Illinois Environmental Protection Agency
Emergency Response Unit
2200 Churchill Road
Springfield, IL 62706

Dear Mr. Dennis Ahlberg:

I am providing the following information to describe our remediation activity on Hawthorne Street in Hartford Illinois. Clark Refining & Marketing Inc., will keep Illinois Envionmental Protection Agency informed of the efforts to clean-up the contaminated soil as environmentally effective as possible.

Our main effort has been on the north side of Hawthorne Street, this portion covers an area of 25 feet wide by 600 feet long. We have excavated the contaminated soil to an approximate depth of 1 foot. The total volume removal is estimated at 850 cubic yards. Soil samplings were taken at 100 feet intervals, with 12 samples taken during each event. We are applying Bio Remediation along with soil removal.

The next sampling will be based on the same grid and will be completed next week. The sample results have notably improved and we hope to see continued improvement.

Two important factors which limit our excavation activity are a high pressure gas line 27" from the soil surface and the heavily trafficked road which has for many years contributed to the contamination of the soil.

00884

CLARK

CLARK

REFINING & MARKETING, INC.

201 East Hawthorne P.O. Box 7
Hartford, Illinois 62048-0007
*ph* 618-254-7301 *fx* 618-254-6064

Clark has abandoned the 6" and the 10" underground leaking lines under Hawthorne and two new lines have been placed in services.

The Abandoned lines have been steamed cleaned and water flushed prior to being capped.

We at Clark intend to pursue our commitment to the public well being. Please let me know if I can be of any further assistance to you.

Sincerely,

Massood Modarres
Environmental Engineer

M. Modarres

cc: Tom Powell
Files

00885

CLARK

October 18, 1994

Illinois Environmental Protection Agency
Charles W. Brutlag
Incident Coordinator Emergency Response Unit
Office of Chemical Safety
2200 Churchill Road
Springfield IL 62794-9276

Re: Incident 942288

Dear Charles Brutlag:

I am responding to the above incident which occurred on October 10, 1994. I'm providing the following information based on the past experience.

Spill amount was calculated to be approximately 25 barrels and the storage tank capacity is 120,000 barrels.

The affected soil was a 25 feet x 25 feet diked area.

The liquid was removed by utilization of a vacuum truck and BIO remediation was applied to treat the contaminated soil.

The total liquid recovery was estimated to be between 20-22 barrels.

The recovered gasoline was recycled back to the refinery process.

No soil remover has been scheduled at this time due to the BIO remediation application.

Please let me know if you need any more information.

Sincerely,

00886

Ray Gamble
Environmental Supervisor

CLARK

REFINING & MARKETING, INC.

201 East Hawthorne P.O. Box 7
Hartford, Illinois 62048-0007
*ph* 618-254-7301 *fx* 618-254-6064

October 7, 1994

Illinois Environmental Protection Agency
Charles W. Brutlag
Incident Coordinator Emergency Response Unit
Office of Chemical Safety
2200 Churchill Road
Springfield IL 62794-9276

Re: Incident 941873

Dear Charles Brutlag:

I am responding to your letter dated August 29, 1994, inquiring the following information regarding Crude oil spill in our refinery.
The affected soil was only the diked area underneath the pipe line in 200-1 tank yard.
Vacuum trucks were utilized to pick up the Crude spill and the contaminated area was sprayed with our Bio sludge(Bio remediation).
Estimated Crude spill was about 100 barrels.
There was no soil removal for disposal because of Bio remedial cleanup for this site.
Please accept my appology for responding so late to this incident. Please let me know if you need any more information.

Sincerely,

Massood Modarres
Environmental Engineer

00887

CLARK

CLARK

REFINING & MARKETING, INC.

201 East Hawthorne P.O. Box 7
Hartford, Illinois 62048-0007
*ph* 618-254-7301 *fx* 618-254-6064

September 30, 1994

LEPC Madison County
157 North Main,
Suite #33
Edwardsville, IL. 62025

RE: Splill @ Clark 9-25-94

Dear Margie:

This is a follow up to your call to the refinery on Monday, (9-27-94). I am sending you the MSDS on Gas Oil which could have been contained in tank 120-7. The different material data sheets reflect different cuts of product processed by the FCC when contained in the tank.

For your records we have confirmed the line that ruptured was the 10 inch Gas Oil line contained within the east tunnel. The plans are to replace the lines to a new tunnel and clean the tunnel.

I have estimated the size of the spill to the ground areas. Along the road the area is 620 feet long by 29 feet wide. This amount would be 17,980 square feet. The area on the south property was estimate to be 6680 square feet. I took half the area of a rectangle with distance of 162 feet along the fence and 83 feet away from the fence.

To date we estimate that 1700 barrels of gas oil was amount of material lost from the tank

The amount of material recovered to date will reflect amounts through 9-29-94.
The total amount of oil recovered is estimated at 1620 barrels. All hydrocarbon material recovered will be reprocessed at the refinery and water will be processed at our waste water treatment plant. We are in the process of beginning a BIO-Remediation plan for the contaminated ground area.

C0888

ADD 80 BBL
30
30
25 → 165 BBL
AFTER THE REPORT
WAS RECOVERED

CLARK

CLARK

REFINING & MARKETING, INC.

201 East Hawthorne P.O. Box 7
Hartford, Illinois 62048-0007
ph 618-254-7301 fx 618-254-6064

September 27, 1994

Mr. Tom Powell
Illinois Environmental Protection Agency
2009 Mall Street
Collinsville IL. 62234

RE: Incident 942188

Dear Tom:

This is a follow up to your visit to the refinery on Monday, (9-27-94). I am sending you the MSDS on Gas Oil which could have been contained in tank 120-7. The different material data sheets reflect different cuts of product processed by the FCC when contained in the tank.

For your records we have confirmed the line that ruptured was the 10 inch Gas Oil line contained within the east tunnel. On your previous visits, which I conducted your tour of this area, I conveyed the suspicion of the leaking line to be the 6 inch. As you can see we now have confirmation which is more similar to the description from Massood Modarres. As previous stated however the plans are to replace both lines to the new tunnel and clean the tunnel as stated.

The Oil Movements Department has confirmed the last time the lines were used for product transfer was September 20, 1994. This would agree with Mr. Crown and his statement to you on September 21, 1994.

I have estimated the size of the spill to the ground areas as you requested. Along the road the area is 620 feet long by 29 feet wide. This amount would be 17,980 square feet. The area on the south property was estimate to be 6680 square feet. I took half the area of a rectangle with distance of 162 feet along the fence and 83 feet away from the fence.

To date today we now estimate that 1700 barrels of gas oil was amount of material lost from the tank.

CLARK

REFINING & MARKETING, INC.

201 East Hawthorne P.O. Box 7
Hartford, Illinois 62048-0007
*ph* 618-254-7301 *fx* 618-254-6064

The amount of material recovered to date will reflect amounts through 8 a.m. on 9-27-94. The total amount of oil recovered is estimated at 1370 barrels. I have arrived at this figure by taking the total amount recovered, which is 1826 barrels and reducing it to a total of 75%. I am considering the other 25% to be rain water which we have also recovered. All hydrocarbon material recovered will be reprocessed at the refinery and water will be processed at our waste water treatment plant.

If I can be of any further assistance to you please do not hesitate to call. My new extension is 530. As always Massood can be reached at extension 218.

Sincerely,

Steve Haug
Environmental Engineer

00890

CLARK

CLARK

REFINING & MARKETING, INC.

201 East Hawthorne P.O. Box 7
Hartford, Illinois 62048-0007
ph 618-254-7301 fx 618-254-6064

September 23, 1994

Illinois Environmental Protection Agency
Charles W. Brutlag
Incident Coordinator Emergency Response Unit
Office of Chemical Safety
2200 Churchill Road
Springfield, IL. 62794-9276

Re: Incident 941913

Dear Charles Brutlag:

The following information is being sent to you to respond to your questions about our spill dated August 23, 1994, reported by Massood Modarres. For your records the material reported is called gasoil and is not separate mixtures of gas and oil.

1. The amount of material released is estimated at 3500 gallons total, which includes 420 gallons contained within the concrete area located on the north side of the road known as Hawthorne. The suspected leaking line is a six inch unit line connected to tank 120-7. The capacity of this tank is 120,000 barrels or 5,040,0000 gallons.

2. The area affected is the northern most point of our south property. On our south property we have production tanks, a truck terminal facility, and terminal storage tanks. The leak occurred inside an underground tunnel between the refinery and the south property.

3. Presently the line is out of service, but due to inventory movements the line could be used for the transfer of product. The tunnel and concrete pit area located on the north side is being monitored on a daily basis by Clark drivers with the Clark suck truck. On the south side material leaking from the tunnel is being caught by a drip barrel and pumped to a barrel located inside the secondary containment. Clark drivers are again monitoring these barrels on a daily basis. After work has finished for our FCC turnaround, replacement of this line will begin. The tunnel will be hydroblasted and cleaned.

CLARK

4. The volume of material recovered to date is 12,400 gallons.

5. The special waste will be sent to a landfill. Product recovered will be reprocessed at the FCC unit. Water recovered in the clean up is disposed at our waste water treatment plant at the refinery.

Please let me know if any other information is required.

Sincerely

Steve Haug

Steve Haug
Environmental Engineer

CLARK

REFINING & MARKETING, INC.

201 East Hawthorne P.O. Box 7
Hartford, Illinois 62048-0007
ph 618-254-7301 fx 618-254-6064

September 1, 1994

Tom Powell
Illinois Environmental Protection Agency
2009 Mall Street
Collinsville IL 62234

RE: Incident 940515

Dear Tom:

This is a reply to your recent inquiry dated August 29, 1994 about our on going work plan for the remedial project at our river facility and the underground black oil line in the city of Hartford and Illinois highway 3.

1. Barton Construction is in the process of cleaning the river bed where asphalt entered the river. This covers a 30 feet by 80 feet area in the water. A 60 foot reach trackhoe is being used to scrap off the bed level in the river. With the river at its lowest level so far this year this procedure is working very effectively.

2. Barton Construction is removing the concrete plug to open up the sub-surface culvert for inspection. We will notify you as soon as the culvert is ready for your inspection.

3. North lagoon was permitted for the discharge of our water treatment plant during an adverse condition. At present oil absorbent booms are being replaced on a routine basis and there are no immediate plans for the cleanup of this lagoon.

4. Black oil line under the Illinois highway 3 and city of Hartford is in a concrete casing and a pressure survey of this line has indicated a small leak somewhere in the casing under the highway. Clark has hired a contractor (JARAND) to use a vacuum truck to remove the oil every time this line is in use.

If you have any more question please let us know.

Sincerely.

Massood Modarres
Environmental Engineer

00893

CLARK

FILE NUMBER _____

RETAIN IN FILE UNTIL 9-97

CLARK

REFINING & MARKETING, INC.

201 East Hawthorne P.O. Box 7
Hartford, Illinois 62048-0007
ph 618-254-7301 fx 618-254-6064

August 31, 1994

Illinois Environmental Protection Agency
Charles W. Brutlag
Incident Coordinator Emergency Response Unit
Office of Chemical Safety
2200 Churchill Road
Springfield IL 62794-9276

Re: Incident 941772

Dear Charles Brutlag:

The following information is being sent to you to respond to your questions about our gasoline spill dated August 9, 1994

1. Estimated gasoline spill was about 2000 BBLS and the involved tank has a 35000 BBLS capacity.

2. Contaminated areas were 9-10 burmed tank yards( 35-1,35-2,35-3,10-3,10-5,80-9,55-3,10-10,120-9).

3. On site Bio remediation is being applied at this time.

4. The total volume recovery was estimated @ 261000gallons.

5. All recovered gasoline was reprocessed, and all water were disposed at our waste water treament plant at the refinery.

Please let me know if you need any more information.

Sincerely,

Massood Modarres
Environmental Engineer

CLARK

C0894

CLARK

REFINING & MARKETING, INC.

201 East Hawthorne P.O. Box 7
Hartford, Illinois 62048-0007
ph 618-254-7301 fx 618-254-6064

FILE NUMBER _____

RETAIN IN FILE UNTIL _____

August 10, 1994

Illinois Environmental Protection Agency
Charles W. Brutlag
Incident Coordinator Emergency
Response Unit
Office of Chemical Safety
2200 Churchill Road
Springfield ILL 62794-9276

Re: Incident 941526

Dear Charles Brutlag:

I am responding to your letter dated July 26, 1994, inquiring the following information regarding 10-5 Tank overfill spill in our refinery.

The affected area was only the diked area around the storage tank(10-5) which is about 150 feet x 150 feet.

Vacuum trucks were utilized to pick up the liquid (off spec. Naphtha and rain water), and the contaminated area was flooded with 2 feet of water for additional cleanup. The following day this additional water was also removed by vacuum trucks and all the liquid was discharged into the refinery BIO unit for recycling and disposal.

The calculated amount of spill is approximately 310 barrels.

The soil is being remedied on site using BIO remediation at this time.

Please let me know if you need any more information.

Sincerely,

Massood Modarres
Environmental Engineer

00895

CLARK

This is the response to request #35 under the RCRA Section.

Please note that we are in the process of implementation of a form for notification (see copy, attached), but in the meantime a simple note written by the notifier is being prepared. Copies of same are attached.

12-20-24

200-1
SPILL

10:30 A IEPA INCIDENT # 942855

10:35 A. LEPC NOTIFIED.

00764

RELEASE ~~NORTH~~
(WEST SIDE OF
HWY 3
10-28-94

CALLED TOM POWELL @ 1:45P
" ~~FER~~ ILLINOIS EPA. 2:00P 942432

" IDOT CALLED 2:15P LARRY
259-1440

10-10-94

120-4
SUCTION
LINE

NRC NOTIFIED INCIDENT # 264676

IEPA INCIDENT # 942288

GAS
OIL
SPILL
120-7 SUCTION

SUNDAY 9-25-94
10:30 A

IEPA 10:42 A 942188

NRC 10:50 A. 262288

CALLED STATE POLICE
CALLED LEPC

00767

8-23-94

GASOIL SPILL
@ SOUTH PROPERTY. FOUND @
6" LINE. 3:00 P

IEPA 94 1913 3:45 P

NRC 256953 4:00 P

TOM POWELL SECRETARY 4:01 P

C0768

CRUDE SPILL 8-18-94

YARD
200 - NORTH EAST GRWSR
~~TEA~~ SHELL 8" INCH

I EPA 1-800-782-7860 11:30A.
REPORT # 941873

NRC
256027 11:45A.

00769

8-9-94

GASOLINE SPILL @
35-2 (MIXER SEAL FAILURE)
HAPPENED @ 6:30A

ILLINOIS EPA 7:45A

941772

NRC 7:50 A.

254308

00770

8-1-94

SPILL (GASOLINE LEAK FROM T-72
@ RIVER DOCK.)

ILLINOIS EPA CALLED 9:10A.
#941701

NRC CALLED 9:20A.

# 252 895,
MRS. GLEMAN

TOM POWELL CALLED 9:00A.

00771

DATE: 7-9-94
10-5 TANK YARD

IEP INCIDENT #

941526

FEDERAL #

248380

BARGE NAME BBC 2002

00772

# Memorandum

DATE: October 13, 1994

TO: Ralph Schmidt, Jerry Barnhill

FROM: Bill R. Irwin

RE: 1994 Spills

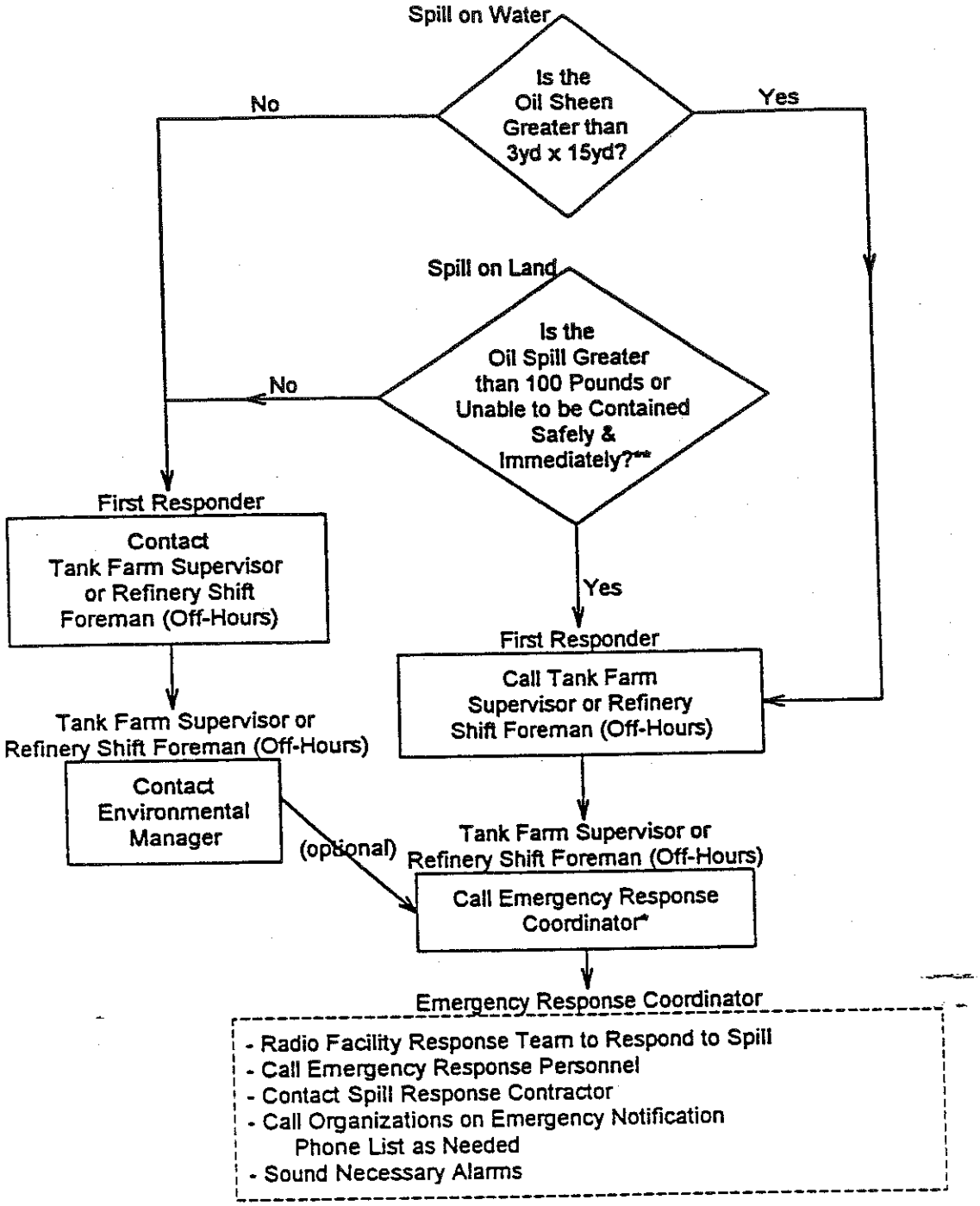
This is the list of spill incidents which have been reported to IEPA for 1994.

| INCIDENT NUMBER | | | CAUSE |
|---|---|---|---|
| 940515 | 3/11/94 | 1800 bbls | Asphalt line at river ASPHALT |
| 940851 | 4/19/94 | 25 bbls | Asphalt at North corner of property ASPHALT |
| 4DBB | 5/23/94 | *** | Oil sheen on river reported by USEPA(Clark suspect) |
| 4DBC | 5/31/94 | *** | Oil sheen on river reported by Coast Guard(Clark sus.) |
| 941478 | 7/2/94 | *** | #2 oil spill on river Clark suspect reported by EPA |
| 941526 | 7/9/94 | 308 bbls | 10-5 tank overfill NAPHTHA AND TOLUENE |
| 941701 | 8/1/94 | *** | River dock gasoline spill |
| 941772 | 8/9/94 | 2000 bbls | 35-2 leak GASOLINE |
| 941873 | 8/15/94 | 100[illegible] bbls | Crude leak in 200-1 yard CRUDE |
| 941913 | 8/23/94 | 50 bbls | 120-7 leak south property GASOIL |
| 942188 | 9/25/94 | 1568 bbls | Gasoil suct. to FCCU from 120-7 GASOIL(under Hawthorne) |
| 942288 | 10/10/94 | 25 bbls | 120-4 suct. line in 200-1 yard GASOLINE |

00773

~~00410~~

# Notification Flow Chart




At the Discretion of the Emergency Response Coordinator

* Or the Alternate

** Spill on water (Mississippi River) or in Drainage Running Off-Site are Automatically Considered Uncontainable

00771

# Report of Oil and Hazardous Substances Release

Report Number _____

| | | |
|---|---|---|
| Reporting Company | ☐ Spill/Release | Date of Release or Discovery |
| Department/Division | ☐ Discovery of Underground Contamination | Time ☐AM☐PM |
| Facility Location | Receiving Medium(s) ☐ Air ☐ Deck ☐ Subsurface | Release confined to Company Property |
| Incident Location | ☐ Land ☐ Surface Water ☐Line Impoundment | |
| Material Spilled/Released/Leaked | ☐ Paving ☐ Ground Water ☐Unlined Impoundment | ☐ Yes ☐ No |

| Reported to the Following Government Agencies: | Name of Person Reported to | Name of Company Person Who Made Report | Date and Time Reported |
|---|---|---|---|
| ☐National Response Center | | | |
| ☐US Coast Guard | | | |
| ☐Illinois EPA | | | |
| ☐Other: | | | |
| ☐Not Reported to a Government Agency | | | |

| Quantity Released as: | | | Quantity Recovered* |
|---|---|---|---|
| Crude | _____Gal. | _____Bbl. | _____ |
| Produced Water | _____Gal. | _____Bbl. | _____ |
| Refined Product | _____Gal. | _____Bbl. | _____ |
| Produced/Natural Gas | _____MSCF | _____ | _____ |
| Hazardous Substance | _____Lbs. | _____ | _____ |
| (☐ CERCLA "Reportable Quantity") | | | *Removed from the Environment |

Notice of Violation
☐Yes ☐No ☐Not Known at this Time

Estimated Cleanup Costs $

Estimated Damages $

**Cause(s)** Check all appropriate boxes:

☐Human Error ☐Corrosion

☐Faulty Procedure ☐Pipe Connection

☐Mechanical Failure ☐Act of God

☐Design Malfunction ☐Non-Company

☐Unknown ☐Other

Source

Vessel/Barge - Name

Pipeline - Name or Number

Equipment - Number

☐Tank Aboveground ☐Hull Leak ☐Process or Pumping Equipment
☐Tank Underground ☐Sump ☐Stack, Flare ☐Well
☐Tank Truck ☐Pipeline/Flowline ☐Unknown
☐Tank Car ☐Piping ☐Other:

Describe how release occurred or how it was discovered and any effect it may have had on others' property. Discuss the degree of public, press or regulatory attention. Identify the company or contractor involved in non-company releases.

Describe assessment and remedial action taken and planned, and the disposal method of recovered material (if any).

Action Taken to prevent Recurrence (if applicable)

| Witness(es) to Spill - Name(s) | Company | Address (of Non-Clark Witnesses) |
|---|---|---|
| | | |

| Report Prepared by | Date | Report Approved by | Date |
|---|---|---|---|
| | | | |

Safety Kleen Manifests requested

1. No. 5575409, Copy 1
2. No. 5500650: Could not find the Copy 1, but have attached a photo copy of copy 3 showing the facility acceptance, and disposal signature and the date.

STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY DIVISION OF LAND POLLUTION CONTROL

SAFETY-KLEEN CORP.
STATE PRESCRIBED FORM
5-160-02

P.O. BOX 19276 SPRINGFIELD, ILLINOIS 62794-9276 (217) 782-6761
State Form LPC 62 8/81 IL532-0610

FOR SHIPMENT OF HAZARDOUS AND SPECIAL WASTE.

NOTE: FORM DESIGNED TO PRINT 8 LINES PER INCH

EPA Form 8700-22 (6-89)

Form Approved, OMB No. 2050-0039 Expires 9-30-94

# UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: ILD 041889023
Manifest Document No.: 17306
2. Page 1 of 1
Information in the shaded areas is not required by Federal law, but is required by Illinois law.

3. Generator's Name and Mailing Address: CLARK
BUILDING 502
HARTFORD
Location if Different: 210 E HAWTHORN
IL 62048

A. Illinois Manifest Document Number: IL 5575409 MANIFEST FEE PAID
B. Illinois Generator's ID: 1190500002

4. Generator's Phone ( 618 ) 254-7301

5. Transporter 1 Company Name: SAFETY-KLEEN CORP.
6. US EPA ID Number: ILD 984908202
C. Illinois Transporter's ID: 1123
D. 618 398-6880 Transporter's Phone

7. Transporter 2 Company Name:
8. US EPA ID Number:
E. Illinois Transporter's ID:
F. ( ) Transporter's Phone

9. Designed Facility Name and Site Address: 516002
SAFETY-KLEEN CORP.
20 TUCKER DRIVE
CASEYVILLE, IL 62232
10. US EPA ID Number: ILD 981097819
G. Illinois Facility's ID: 1630250007
H. Facility's Phone: (618 398-6880

| 11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number) | 12. Containers No. | Type | 13. Total Quantity | 14. Unit Wt/Vol | I. Waste No. |
|---|---|---|---|---|---|
| a. WASTE COMBUSTIBLE LIQUID, N.O.S. (PETROLEUM NAPHTHA)NA1993 PGIII (D039) (D006, D008, D018, D040)(ERG#27)6.7LBS/GAL | 004 | DM | 00101 | G | EPA HW Number: XXD039; Authorization Number: 000353 |
| b. | | | | | EPA HW Number: XX; Authorization Number: |
| c. | | | | | EPA HW Number: XX; Authorization Number: |
| d. | | | | | EPA HW Number: XX; Authorization Number: |

RECEIVED
DEC 23 1994
HARTFORD RE

J. Additional Descriptions for Materials Listed Above
I(A) D006 D008 (A) D018, D040

K. Handling Codes for Wastes Listed Above in Item #14
G = Gallons Y = Cubic Yards

15. Special Handling Instructions and Additional Information
ILP39098 PP# 517306 9450 75370551 517306 5-160-02-3082 03
EMERGENCY RESP#708-888-4660 24HR
SKDOT# A: 644 B: C: D:

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations, and Illinois regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; **OR**, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: RAY GAMBLE
Signature: Ray Gamble
Date: Month 12 Day 16 Year 94

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: WILLIAM SHADWICK
Signature: William Shadwick
Date: Month 12 Day 16 Year 94

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name:
Signature:
Date: Month Day Year

19. Discrepancy Indication Space
00761

20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.
Printed/Typed Name: BETTIE K. HOUSTON
Signature: Bettie K. Houston
Date: Month 12 Day 16 Year 94

GENERATOR / TRANSPORTER / FACILITY

This Agency is authorized to require, pursuant to Illinois Revised Statutes 1989, Chapter 111½ Sections 1004 and 102, that this information be submitted to the Agency. Failure to provide the information may result in a civil penalty against the owner or operator not to exceed $25,000 per day of violation. Falsification of this information may result in a fine up to $50,000 per day of violation and imprisonment up to 5 years. This form has been approved by the Forms Management Center.

COPY 1. TSD MAIL TO GENERATOR

In case of a spill call the Illinois Office of Emergency Response at 217/782-3637 and the National Response Center at 800/424-8802 or 202/426-2675.

...Y-KLEEN CORP. P.O. BOX 19276 SPRINGFIELD, ILLINOIS 62794-9276 (217) 782-6761
...ATE PRESCRIBED FORM State Form LPC 62 8/81 IL532-0610
FOR SHIPMENT OF ... AND SPECIAL WAST...
...FORM DESIGNED TO PRINT 8 LINES PER INCH EPA Form 8700-22 (6-89) Form Approved. OMB No. 2050-0039 Ex...

160-02

# UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: ILD 041889023
Manifest Document No.: 81799
2. Page 1 of 1
Information in the shaded ... is not required by Federal ... is required by Illinois law.

3. Generator's Name and Mailing Address: CLARK BUILDING 502 HARTFORD
Location if Different: 210 E HAWTHORN IL 62048
4. Generator's Phone ( 618 254-7301

A. Illinois Manifest Document Number: IL 5500650 MANIFEST FEE PAID
B. Illinois Generator's ID: 1190500002
C. Illinois Transporter's ID: 1123
D. Transporter's Phone: 618 398-6880
E. Illinois Transporter's ID:
F. Transporter's Phone:
G. Illinois Facility's ID: 1630250007
H. Facility's Phone: 618 398-6880

5. Transporter 1 Company Name: SAFETY-KLEEN CORP.
6. US EPA ID Number: ILD 984908202
7. Transporter 2 Company Name:
8. US EPA ID Number:
9. Designed Facility Name and Site Address: 516002 SAFETY-KLEEN CORP. 20 TUCKER DRIVE GASEYVILLE, IL 62232
10. US EPA ID Number: ILD 981097819

| 11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number) | 12. Containers No. | Type | 13. Total Quantity | 14. Unit Wt/Vol | Waste No. |
|---|---|---|---|---|---|
| a. ~~WASTE COMBUSTIBLE LIQUID, N.O.S. (PETROLEUM NAPHTHA) NA1993 PGIII (D001, D006, D008, D018, D035, D039, D040)~~ | | ~~DM~~ | | ~~G~~ | EPA HW Number: X X ~~D001~~ Authorization Number: ~~000352~~ |
| b. RQ WASTE COMBUSTIBLE LIQUID, N.O.S. (PETROLEUM NAPHTHA) NA1993 PGIII (D001, D006, D008, D018, D035, D039, D040) | 004 | DM | 00083 | G | EPA HW Number: X X D001 Authorization Number: 000353 |
| c. | | | | | EPA HW Number: X X Authorization Number: |
| d. | | | | | EPA HW Number: X X Authorization Number: |

J. Additional Descriptions for Materials Listed Above
I(A) D039 D018 (A) D006, D008, D035, D040
I(B) D039 D018 (B) D006, D008, D035, D040

K. Handling Codes for Wastes Listed Above in Item #14
G = Gallons Y = Cubic Yards

15. Special Handling Instructions and Additional Information
9426 69398170 781799 5-160-02-3082 03
EMERGENCY RESP#708-888-4660 24HR
SKDOT# A: 501 B: 585 C: D:

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations, and Illinois regulations.
If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: MASSAND MODARRES
Signature: M. Modarres
Date: Month 06 Day 29 Year 94

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: WILLIAM SHADWICK
Signature: William Shadwick
Date: Month 06 Day 29 Year 94

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name:
Signature:
Date: Month Day Year

19. Discrepancy Indication Space
11a. WASTE STREAM WAS NOT PICKED UP
00762

20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.
Printed/Typed Name: Katie Hooker
Signature: Katie Hooker
Date: Month 06 Day 29 Year 94

GENERATOR

TRANSPORTER

FACILITY

This Agency is authorized to require, pursuant to Illinois Revised Statutes 1989, Chapter 111½ Sections 1004 and 102, that this information be submitted to the Agency. Failure to provide the information may result in a civil penalty against the owner or operator not to exceed $25,000 per day of violation. Falsification of this information may result in a fine up to $50,000 per day of violation and imprisonment up to 5 years. This form has been approved by the Forms Management Center.

COPY 3. TSD COPY



In case of a spill call the Illinois Office of Emergency Response at 217/782-3637 and the National Response Center at 800/424-8802 or 202/426-2675.

CITGO Petroleum Corp.
P.O. Box 3758
Tulsa, OK 74102-3758
U.S.A

Telephone Number: 918-495-4000

# FACSIMILE COMMUNICATION

To: Matt Sorrells

From: Yvonne Hale

Comments: Requested by Dick Dono (Warmann TH# 4023003)

Following is the Material Safety Data Sheet you requested. In addition to Hazard Communication requirements, the MSDS is intended to provide notification of SARA Section 313 "toxic chemicals" per 40 CFR 372. In order for the MSDS to serve its intended purpose, it should be forwarded to those persons in your organization who have a need for safety and environmental information.

If you are a distributor, OSHA and EPA regulations require that you provide a copy of the MSDS to your customers. You should consult 40 CFR 372.45 for guidance with respect to products containing toxic chemicals referenced in SARA section 313.

If you have questions regarding CITGO's Hazard Communication Program, please contact sender at the above address.

Number of Pages (Including Cover Page) : 8

00776

CITGO Petroleum Corporation
P.O. Box 3758
Tulsa, Oklahoma 74102

# *Material Safety Data Sheet*

| | | |
|---|---|---|
| Trade Name: | CITGO Tractor Hydraulic Fluid | (FCCU Slide Valve Lubricant) |
| Commodity Code: | 33-310 | |
| Synonyms: | Lubricating Oil | Date: July 14, 1994 |
| CAS No.: (Refer to Section 1.0) | Mixture | Technical Contact: (918) 495-5933<br>Medical Emergency: (918) 495-4700<br>Chemtrec Emergency: (800)424-9300 |
| Citgo Index No.: | 0241 | |

## Material Hazard Evaluation

(Per OSHA Hazard Communication Standard [29 CFR Part 1910.1200]) (OHCS)

Health: Final Product Non-Hazardous.

Precautionary Statement: Do not inhale mists or fumes. Prevent direct dermal contact with oil.

*HMIS Rating*[1]: Health 0 Flammability 1 Reactivity 0

## 1.0 Generic Composition / Components

| Components | CAS # | % | Hazard Data |
|---|---|---|---|
| Refined Petroleum Oil(s) | 64741-89-5<br>64742-88-4<br>64742-65-0<br>64742-54-7 | 75-93 | Oral LD50(rat): > 5g/kg<br>Eye: Practically Non-Irritating<br>Skin: Practically Non-Irritating<br>Ihln LC50/4H(rat): > 5,000mg/m$^3$ |
| Anti-wear, and VI Improver (contains zinc dithiophosphate) | Mixture | 8-12 | Eye: Irritant<br>Dermal: Irritant |
| Pour Point Depressant | Mixture | < 1 | Eye and skin irritant |
| Anti-Foam | Mixture | < 0.5 | Eye, skin and respiratory irritant |

00777

[1] Hazard Rating: least-0; slight-1; moderate-2; high-3; extreme-4
Citgo assignment based on our evaluation per NFPA and NPCA guidelines.

NA - Not Applicable ND - No Data NE - Not Established

# 2.0 Physical Data

Physical Hazard Classification (Per 29 CFR Part 1910.1200)

| | | | | | |
|---|---|---|---|---|---|
| No | Combustible | No | Flammable | No | Pyrophoric |
| No | Compressed Gas | No | Organic Peroxide | No | Reactivity |
| No | Explosive | No | Oxidizer | Yes | Stable |

| | |
|---|---|
| Boiling Point, 760 mmHg, °C(°F): | ~343(~650) |
| Specific Gravity (60/60°F) ($H_2O$. = 1): | 0.88 |
| Vapor Density (Air = 1): | > 1 |
| % Volatiles by Volume: | Negligible |
| Melting Point, °C(°F): | NA |
| Vapor Pressure, mmHg (25°C): | ND |
| Solubility in $H_2O$., % by Weight: | Negligible |
| Evaporation Rate (Butyl Acetate = 1): | < 1 |
| pH of Undiluted Product: | NA |
| Appearance and Odor: | Amber liquid - mild odor. |

# 3.0 Fire and Explosion Data

| | |
|---|---|
| Flash Point, COC, °C(°F) | 204(400) |
| Flash Point, PMC, °C(°F) | 196(385) |
| Fire Point, COC, °C(°F) | 218(425) |
| NFPA Rating[2] | Health: 0 Flammability: 1 Reactivity: 0 |
| Flammable Limits (% by volume in air) | Lower: NA Upper: NA |
| Extinguishing Media | $CO_2$, dry chemical, foam, water fog |
| Special Fire Fighting Procedure | None. |
| Unusual Fire or Explosion Hazard | Water may cause frothing. |

# 4.0 Reactivity Data

| | |
|---|---|
| ***Stability:*** | Stable |
| ***Conditions Contributing to Instability:*** | None. |
| ***Incompatibility:*** | Strong oxidants. |
| ***Hazardous Decomposition Products: (thermal, unless otherwise specified)*** | $CO_2$ (CO under incomplete combustion) |
| ***Conditions Contributing to Hazardous Polymerization:*** | None. |

00778

[2] Hazard Rating: least-0; slight-1; moderate-2; high-3; extreme-4
Citgo assignment based on our evaluation per NFPA guidelines.

NA - Not Applicable ND - No Data NE - Not Established

# 5.0 Spill or Leak Procedures

**Procedures if Material is Spilled:**

- Remove sources of heat or ignition, provide adequate ventilation, contain leak.
- *Small Spills*: Absorb with suitable material such as rags, straw or sand. Place into containers for later removal.
- *Large Spills*: Contain spill in earthen dikes for later recovery.
- Report spills as required to appropriate authorities.

**Waste Disposal:**

- It is the responsibility of the user to determine if the material is a hazardous waste at the time of disposal.
- Check before disposing to be sure you are in compliance with all applicable laws and regulations.
- RCRA Emergency Hotline Number: 800-424-9346.

**Protective Measures During Repair and Maintenance of Contaminated Equipment:**

- Refer to Section 7.0 - Special Protection Information.
- Avoid prolonged contact with used oil.
- Wash exposed skin thoroughly with soap and water.
- Remove soiled clothing.
- Use oil impervious gloves if direct contact is expected.

# 6.0 Health Hazard Data

## *Health Hazard Classification*

(Per 29 CFR Part 1910.1200)

| | | | |
|---|---|---|---|
| No | Carcinogen | No | Corrosive |
| No | Animal Carcinogen | No | Irritant |
| No | Suspect Carcinogen | No | Sensitizer |
| No | Mutagen | No | Teratogen |
| No | Highly Toxic | No | Target Organ |
| No | Toxic | | |

Product listed as Carcinogen or Potential Carcinogen by:

NTP No IARC No OSHA No Other No

**Toxicity Summary:** General toxicity low.

**Major Route(s) of Entry:** Inhalation of incidental mists or vapors.

00779

## Acute Exposure Symptoms

| | |
|---|---|
| ***Inhalation:*** | Low risk of inhalation at ambient temperatures. Mists or fumes may cause drowsiness, dizziness, headache, nausea, or lung irritation or chemical pneumonitis. |
| ***Dermal Contact:*** | Transient, slight irritant. |
| ***Eye Contact:*** | May be mildly irritating. |
| ***Ingestion:*** | Low toxicity. On ingestion of large quantities, slight GI discomfort, diarrhea, and headache may occur. |
| ***Injection:*** | Subcutaneous or intramuscular injection may cause irritation, erythema, edema. |

## Chronic Exposure

Prolonged and/or frequent contact may cause drying, cracking (dermatitis) or folliculitis.

## Other Special Effects

None expected.

## Medical Conditions Aggravated by Exposure

None.

# *First Aid and Emergency Procedures for Acute Effect*

| | |
|---|---|
| ***Inhalation:*** | Remove to fresh air. Respiratory support, if necessary. Seek medical aid. |
| ***Dermal:*** | Wash with soap and water. Do not wear heavily contaminated clothing before laundering. |
| ***Eyes:*** | Flush with large volumes of water. Seek physician if any complications arise. |
| ***Ingestion:*** | Induce vomiting. Seek medical aid. |
| ***Injection:*** | Subcutaneous injection is a medical emergency. Seek medical aid immediately. |

**Notes to Physician:** On ingestion at Saybolt viscosity of about 300 SUS (100°F), the aspiration potential into the lungs is minimal. For quantities above 1 oz., emesis or lavage may be considered. Subcutaneous or intramuscular injection requires prompt surgical debridement. If not familiar with technique, seek skilled advice.

00780

# 7.0 Special Protection Information

**Ventilation Requirements:** Use in well ventilated area. In confined space, mechanical ventilation may be required to keep levels of certain components below mandated standards as evaluated by designated personnel.

| | | | | |
|---|---|---|---|---|
| Permitted Threshold Air Concentrations Mineral Oil Mist | TLV-TWA | 5 mg/m³ | OSHA-PEL | 5 mg/m³ |
| | TLV-STEL | 10 mg/m³ | OSHA-STEL | ND |
| | TLV-Ceiling | ND | OSHA-Ceiling | ND |
| | | | OSHA-Peak | ND |

**Specific Personal Protective Equipment:**

**Respiratory:** Normally none required. If high vapor or mist concentrations expected, use respirator approved for organic vapors and mists.

**Eyes:** Safety goggles, or chemical splash goggles if splashing is anticipated.

**Dermal:** Oil impervious gloves if frequent or prolonged contact is expected.

**Other Clothing or Equipment:** Wear body-covering work clothes to avoid prolonged or repeated exposure. Launder soiled work clothes before reuse.

# 8.0 Transportation and Special Precautions

***Storage:*** Store below 150°F. Do not apply high heat or flame to container. Keep separate from strong oxidizing agents.

***Caution:*** Empty containers may contain product residue which could include flammable or explosive vapors.

Consult appropriate Federal, State and Local authorities before reusing, reconditioning, reclaiming, recycling or disposing of empty containers and/or waste residues of this product.

***DOT Information***

| | |
|---|---|
| Proper Shipping Name: | Petroleum Lubricating Oil. |
| Hazard Class: | Non-Hazardous. |
| Hazard Identification Number: | None assigned. |
| Placard: | None. |
| Compatability Category: | ND |
| CHRIS Code: | ND |

00781

# 9.0 Environmental Data

Product Name: CITGO Tractor Hydraulic Fluid
Commodity Code: 33-310

## SARA TITLE III

### Section 313 - Toxic Chemicals

This product does contain toxic chemicals of Section 313 of Title III of Superfund Amendments and Reauthorization Act of 1986 (SARA) and 40 CFR Part 372.

| Components | CAS# | % |
|---|---|---|
| Zinc Dialkyldithiophosphates | 68649-42-3 | <4 |

### Section 311 - Hazard Categories

Yes Not Applicable
No Acute (Immediate Health Hazard)
No Chronic (Delayed Health Hazard)
No Fire Hazard
No Sudden Release of Pressure Hazard
No Reactive Hazard

### Section 302/(A) - Extremely Hazardous Substances

(RQ = Reportable Quantity)
(TPQ = Threshold Planning Quantity)

This product does not contain Extremely Hazardous Substances of Section 302/(A).

| Component | CAS# | % | RQ lbs. | TPQ lbs. |
|---|---|---|---|---|
| None | - | - | - | - |

### Clean Water Act

Under Section 311 (b) (4) of the Clean Water Act, discharges of crude oil and petroleum products in any kind or form to surface waters must be immediately reported to the National Response Center: 800-424-8802.

### Comprehensive Environmental, Response, Compensation & Liability Act (CERCLA) - Section 102 Hazardous Substances

| Component | CAS# | % | RQ lbs. |
|---|---|---|---|

Petroleum and petroleum fractions are excluded from the list of CERCLA hazardous substances by Section 101(14) of CERCLA.

### New Jersey Worker and Community Right-to-Know Act

Petroleum Oil

### Federal Regulations

Reported in TSCA Inventory:

| | | | |
|---|---|---|---|
| Product | ___ Yes | ___ No | x NA |
| Components | x Yes | ___ No | ___ NA |

C0782

# 10.0 Labeling

***NOTE***

***This product has been determined not to be a physical or a health hazard as defined by the OSHA Hazard Communication Standard.***

00783

ALL STATEMENTS, INFORMATION, AND DATA PROVIDED IN THIS MATERIAL SAFETY DATA SHEET ARE BELIEVED TO BE ACCURATE AND RELIABLE, BUT ARE PRESENTED WITHOUT GUARANTEE, REPRESENTATION, WARRANTY, OR RESPONSIBILITY OF ANY KIND, EXPRESSED OR IMPLIED. ANY AND ALL REPRESENTATIONS AND/OR WARRANTIES OF MERCHANTIBILITY OR FITNESS FOR A PARTICULAR PURPOSE ARE SPECIFICALLY DISCLAIMED. USERS SHOULD MAKE THEIR OWN INVESTIGATIONS TO DETERMINE THE SUITABILITY OF THE INFORMATION OR PRODUCTS FOR THEIR PARTICULAR PURPOSE. NOTHING CONTAINED HEREIN IS INTENDED AS PERMISSION, INDUCEMENT, OR RECOMMENDATION TO VIOLATE ANY LAWS OR TO PRACTICE ANY INVENTION COVERED BY EXISTING PATENTS, COPYRIGHTS OR INVENTIONS.

**Illinois Environmental Protection Agency**
**Division of Land Pollution Control**

# RCRA INSPECTION REPORT

| | |
|---|---|
| USEPA #: IL D 0 4 1 8 8 9 0 2 3 | IEPA #: 1 1 9 0 5 0 0 0 0 2 |
| Facility Name: Clark Refining and Marketing, Inc. | Phone #: 618/254-7301 |
| Street Address: 201 East Hawthorne Street P. O. Box 7 | County: Madison |
| City: Hartford | State: Illinois Zip: 62048-0007 |
| Region: 6 | Inspection Date: 05 / 24 / 95 From: 8:15 a.m. To: 3:00 p.m. |
| Weather: | |

## TYPE OF FACILITY

| | |
|---|---|
| Notified As: Generator | Regulated As: G-1/S |
| LDF? No (Yes or No) HPV? Yes | 90-Day F/U Required?: YES X NO ____ |

## TYPE OF INSPECTION

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

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: 08/ 18 / 80 , from (initial) or (subsequent) Notification.

Initial Part A Date: 11 / 18 / 80 Amended: ___ / ___ / ___

Part A Withdrawal requested: 11 / 23 / 82 Approved by (US)(IL) EPA: 12 / 15 / 83

## PART B PERMIT APPLICATION

Part B Permit Submitted: Y or N ___ / ___ / ___ Final Permit Issued: ___ / ___ / ___

## ENFORCEMENT

Has the firm been referred to -- USEPA: Y or N ___ / ___ / ___

Illinois Attorney General: Y or N 10 / 20 / 93 County State's Attorney: Y or N ___ / ___ / ___

## ORDERS ISSUED

CACO: ___ / ___ / ___ CAFO: ___ / ___ / ___ 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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| OWNER | | OPERATOR | |
|---|---|---|---|
| Name | Clark Refining & Marketing, Inc. | Name | Clark Refining & Marketing, Inc. |
| Address | 8182 Maryland Avenue | Address | 201 East Hawthorne St. P. O. Box 7 |
| City | St. Louis | City | Hartford |
| State | Missouri Zip 63105 | State | Illinois Zip 62048-0007 |
| Phone # | 314/889-9600 | Phone # | 618/254-7301 |

| PERSON(S) INTERVIEWED | TITLE | PHONE # |
|---|---|---|
| Bill Irwin | Environmental Manager | 618/254-7301 |
| Massood Madarres | Environmental Engineer | 618/254-7301 |
| Ray Gamble | Environmental Specialist | 618/254-7301 |
| | | |
| | | |
| | | |

| INSPECTION PARTICIPANT(S) | AGENCY/TITLE | PHONE # |
|---|---|---|
| Chris Cahnovsky | IEPA/EPS III | 618/346-5120 |
| Mike Grant | IEPA/EPS IV | 618/346-5120 |
| Mike Ribordy | USEPA/Geologist | 618/886-4592 |
| | | |

| PREPARED BY | AGENCY/TITLE | PHONE # |
|---|---|---|
| Chris Cahnovsky | IEPA/EPS III | 618/346-5120 |

# SUMMARY OF APPARENT VIOLATIONS

*Previously Alleged

| Area | Class | Section | |
|---|---|---|---|
| | | 722.134(a) | * |
| | | 725.131 | * |
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| Area | Class | Section |
|---|---|---|
| GGR | 1 | 722.111 |
| GPT | 1 | 722.134(a) |
| | | 725.152(e) |
| | | 725.211 |
| | | 725.214 |
| | | 725.271 |
| | | 725.274 |
| | | 725.294(a) |
| | | 725.297(a) |
| GPT | 1 | 722.134(c) |
| GRR | 2 | 722.140(a) |
| GRR | 2 | 722.141(a) |
| DLB | 2 | 728.107(a)(2) |

| Area | Class | Section |
|---|---|---|
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1190500002 - Madison County
Clark Refining and Marketing, Inc.
Date of Inspection: May 22 - 24, 1995
Prepared by: Chris Cahnovsky

# NARRATIVE

Between May 22 and May 24, 1995, Mike Grant (IEPA), Mike Ribordy (USEPA) and I conducted the Resource Conservation and Recovery Act (RCRA) portion of a Multi-Media Inspection (MMI) at Clark Refining and Marketing, Inc.'s Hartford Refinery. This MMI involved inspectors from both Illinois Environmental Protection Agency (Agency) and the United States Environmental Protection Agency (USEPA). The specific regulatory areas inspected include RCRA, Air Pollution Control, Toxic Substance Control Act and Superfund Amendments and Reauthorization Act Title III: Emergency Planning Community Right-to-Know Act. A list of inspection participants is attached to this narrative (Attachment 1).

Clark's Hartford refinery is a coking refinery with a capacity to process 70,000 barrels per stream day of heavy, sour crude. The refinery processes in excess of 60,000 barrels per day (BPD) of intermediate and sour crude oils to produce over 30,000 BPD of gasoline and more than 21,000 BPD of diesel fuels. In addition, the refinery produces more than 1,000 BPD of asphalt, over 800 BPD of liquified petroleum and greater than 4,000 BPD of petroleum coke. The processes at Clark include the crude unit, delayed coker unit, fluid catalytic cracker, alkylation unit, reformer, distillate hydrodesulfurization unit, total isomerization process, and the biological oxidation unit (wastewater treatment process).

Clark generates several different hazardous wastestreams. Some of the frequently generated wastestreams include Dissolved Air Float (K048), Slop Oil Emulsion Solids (K049), Primary and Secondary Wastewater Treatment Sludge (F037 and F038), Heat Exchanger Bundle Cleaning Sludge (K050), Coker Unifier Sludge (D004 and D018), Spent Reformer Filters (D007 and D018) and tank bottoms (D018).

The various wastestreams generated throughout the facility are containerized at the point of generation and bought to the Drum Accumulation Pad (DAP). The DAP is designated as an under 90 day hazardous waste accumulation area. Twenty-five drums of heat exchanger bundle cleaning sludge (K050) were observed in this area. I also observed, ten drums of spent catalysts (D001 and D018), one drum of alky filters (D001), three 5-gallon pails of lead acetate, one drum of alcohol (D001) and nine 25-gallon plastic containers of spent reformer filters (D018 and D007). The nonhazardous wastes being accumulated on the DAP include soda ash, spent lime, monyl polysulfide and anti-freeze.

During the inspection of DAP, I observed one drum of waste alcohol (D001) dated March 30, 1995. The top of this drum was bulging. This is an apparent violation of 722.134(a), specifically 725.271. The presence a bulging drum was not indicated on the inspection records between March 28, 1995 and May 16, 1995. This is an apparent violation of 722.134(a), specifically 725.274. I also observed two drums of K050 which were not labeled with the words "Hazardous Waste". It appeared that the outside of the drums were so corroded that the labels were not properly adhering. However, labels were affixed to these drums, using an adhesive, before the end of the inspection.

Clark operates a wastewater treatment facility (WWTF) known as the Biological Oxidation Unit. Process wastewaters from the refinery are diverted to various cement junction boxes which are connected by solid pipes to two lift stations. These lift stations pump the process water to two flow equalization tanks, Tanks T-161 and T-162. Each of these tanks have a 0.5 million gallon reported capacity and have been in service for approximately one year. The recovered oil from T-161 and T-162 is transferred to Tank 5-10. The recovered oil from 5-10 is charged to the crude line for recycling. Bottom sludge from tanks T-161, T-162 and 5-10 would be considered F037, F038 and K049. Tanks T-161 and T-162 are equipped with manways for collection of F037, F038 and K049 sludge. Clark has not removed any sludge from these tanks since they were put into service.

A Dissolved Air Floatation Unit (DAF) is used to remove non-settleable emulsions from water by the introduction of a flocculent to promote coagulation and dissolved air that promotes floatation. The skimming from the DAF is considered a hazardous waste carrying the K048 waste code. The DAF effluent is joined by the sanitary sewer in route to the biological treatment units. Up until about three months ago the DAF skimming were collected in Tank V46 and then pumped to the Number 4 Agitator Tank (Tank 4). Currently, the DAF skimming are sent to the East Settling Pit before being pumped to Tank 4.

Tank V46 is no longer in use as a K048 collection tank. This tank is considered a RCRA regulated tank. This tank was labeled with the words "Hazardous Waste". Per Mr. Ray Gamble, Wastewater Supervisor, Tank V46 was taken out of service about three months ago. He also stated that V46 has not been cleaned to remove any residual K048. Apparently, no generator closure activities have been performed on Tank V46. This is an apparent violation of 722.134(a) specifically, 725.211 and 725.214. The requirements of 725.211 also requires the generator to comply with 725.297(a) in Subpart J: Tank Systems.

The Number 4 Agitator Tank which has a capacity of 82,000 gallons is a vertical cylindrical carbon steel, above-grade, fixed roof tank with an elevated cone bottom. Tank 4 was built in about 1947 and was originally used for caustic service. In 1977, the tank was put into slop oil service. Tank 4 was put into hazardous waste service in 1988 or 1989. Tank 4 has adequate secondary containment. At Tank 4, a satellite drum is being utilized below the hose/piping outside the containment area to collect oily liquid. This drum was properly labeled and closed.

According to Ray Gamble, Tank 4 has about 9 to 10 feet of a hard substance on the bottom of the tank. Mr. Gamble did not know the origin of the residual material in the tank. Mr. Gamble stated that when the tank gauge reads between 9 and 10, Tank 4 is considered empty. It has not been determined if the material in this tank has become a listed hazardous waste carrying the K048 waste code pursuant to the "mixture rule" contained in 35 Ill. Adm. Code 721.103.

A hazardous waste tank assessment was completed in October 1993. This assessment revealed severe corrosion of the top and upper 2 shell courses. Tank reports from 1960, 1971 and 1972 all showed that Tank 4 was in poor condition. Black and Veatch Waste Science and Technology Corp, who performed the assessment recommended that the tank be taken out of service for a thorough internal inspection and it was likely that the top and 2 upper shell courses would have to be replaced to pass inspection. I spoke with Dennis Gusewelle, Mechanical Engineer about this assessment. Mr, Gusewelle stated that Clark performed their own inspection of this problem and concluded that Tank 4 was within a tolerable range for the type of waste being handled. I asked if there was a copy of this report. He stated there was no copy of Clark's internal audit. This second assessment conducted by Clark should have been performed by a second independent professional engineer. For this reason the apparent violation of 722.134(a), specifically 725.294(a) is being alleged for the use of a hazardous waste tank system that may be unfit for use.

Stormwater that previously would have went to the Guard Basin is now collected at Lift Station #5 where three 100 gpm pumps are provided to pump the stormwater to Tanks T-161 and T-162. During large storm events, overflow stormwater and oily process water is discharged from Lift Station #5 and is received at the oil separator at the east end of the facility. Stormwater and oily process water reaches the oil separator via an earthen ditch. I observed this ditch during this inspection and saw large amounts of oil in the ditch. This is an apparent violation of 722.134(a), specifically 725.131. No waste analysis was available to determine if this oil exhibited a characteristic of a hazardous waste. This is an apparent violation of 722.111.

The oil that is collected at the oil separator is vacuum trucked to WWTF. I observed large amounts of oily waste around the oil separator. It appears that this separator overflowed leaving its secondary containment stained with oily waste. Two oil covered dead birds were observed in this secondary containment. Also, oily water was observed outside of the oil separator in a small dug out area on the north side of the separator. This also is an apparent violation of 722.134(a), specifically 725.131. The overflow water from the oil separator is diverted to the Guard Basin.

On October 27, 1992, Clark informed the Agency that primary wastewater treatment sludge (F037) and secondary wastewater treatment sludge (F038) may have impacted the Guard Basin and the ditches leading to the Guard Basin. The F037 and F038 listing came into effect in November, 1990 (Federal Register/Vol. 55, No 213 November 2, 1990). Before this rule, the Guard Basin received dry weather flow from the wastewater treatment system. In 1991, Clark decided to prevent all dry weather flow from entering the Guard Basin. Clark constructed an overflow and underflow weir and the oil separator to contain excess stormwater and oily process water. Between August and October, 1992, Clark determined that their efforts to prevent all dry weather flow from the Guard Basin may have been unsuccessful. Clark is working with the Remedial Project Management Section's Pre-Notice Program to perform a voluntary clean up of the Guard Basin. According to Clark's, manifests the last load of F037-F038 sludge apparently was shipped to Peoria Disposal Company on or about February 10, 1994.

Clark operates and maintains a heat exchanger bundle cleaning pad. About three months ago, Clark started to capture the sludge from the pad and drum it up for off-site disposal as K050. Per, Mr. Irwin, this was done to keep large amounts of sludge from entering the process sewer system. About 99% of the sludge is captured using sorbant booms around the sewer entrance. The drummed waste is accumulated at the drum accumulation pad.

The K048 sludge from Tank 4 is vacuum trucked to Tank T1-18. From Tank T1-18 the sludge is pumped to Tank PV1433. The injection tank is a pressure vessel that uses nitrogen to pressurize the tank for the injection of K048 into the coke drum. Per Mr. Randy Lindley, Process Foreman, K048 is injected into the coke drum every 16 to 24 hours and it takes about one hour to complete the injection of Tank PV1433. Tank PV1433 is dedicated to the delivery of K048 into the coker. When Tank T1-18 is down, K048 can be directly fed into PV1433. A satellite drum was observed under the loading pipe to Tank PV1433 to capture any K048 that leaks during truck unloading. This drum was not labeled with the words "Hazardous Waste", nor was the drum closed. This is an apparent violation of 722.134(c).

A review of Clark's waste management records were reviewed during this inspection. The following is a summary of the review.

MANIFESTS

The original signed copy , which is return to the generator from the receiving facility, of manifests IL5500650 could not be located in Clark's files. This is an apparent violation of 722.140(a).

Copies of Land Disposal Restriction Notification Forms for manifests IL6267938, IL6256038, IL6256017 and IL4704915 could not be located in Clark's manifest files. Massood Modarres, Environmental Engineer had copies of the Land Disposal Restriction Notification Forms for most these manifests FAXed from the receiving facilities by the end of the inspection except for manifest IL4704915. For this reason, the apparent violation of 728.107(a)(7) is being alleged.

ANNUAL REPORT

Several wastestreams were not included in the 1994 Annual Report. These wastestreams include waste petroleum naphtha (D001) manifested to Safety-Kleen, coker unifier spent catalyst (D004 and D018) manifested to Amex Metals Recovery and zinc sulfide (D003) manifested to Trade Waste Incineration. Also, the amounts of K048, K050, K051 and K049 that were injected in the Delayed Coker Unit were not reported in the 1994 Annual Report. These are apparent violations of 722.141(a).

RCRA CONTINGENCY PLAN

Clark has a combined Emergency plan and RCRA Contingency Plan. This plan lists and has maps showing the various locations of the emergency equipment. However, this plan does not include the location and physical description of emergency equipment (such as fire extinguishing systems, spill control equipment, communications and alarm systems and decontamination equipment) at the under 90 day hazardous waste accumulation pad. This is an apparent violation of 722.134(a), specifically 725.152(e).

As a result of this Multi-Media Inspection, the following violations are being alleged:

1) 722.111;

2) 722.134(a), specifically 725.131, 725.152(e), 725.211, 725.214, 725.271, 725.274, 725.294(a), and 725.297(a);

3) 722.134(c);

4) 722.140(a);

5) 722.141(a); and

6) 728.107(a)(7).

**NOTE:** The apparent violation of 722.134(a), specifically 725.131 remains outstanding from the June 30, 1993 Compliance Evaluation Inspection.

ATTACHMENT 1

# INSPECTION PARTICIPANTS

Illinois Environmental Protection Agency

| | |
|---|---|
| Chris Cahnovsky | Environmental Protection Specialist |
| Mike Grant | Environmental Protection Specialist |
| Jeff Benbenek | Environmental Protection Engineer |
| Tom Powell | Environmental Protection Specialist |
| Mark Johnson | Environmental Protection Specialist |

United States Environmental Protection Agency

| | |
|---|---|
| Silvia Palomo | Environmental Engineer |
| Cyd Curtis | Environmental Scientist |
| Mike Ribordy | Geologist |
| Jeffery Cox | Assistant Regional Counsel |

Illinois Attorney General's Office

| | |
|---|---|
| Jim Morgan | Senior Assistant Attorney General |

Clark Refining and Marketing, Inc.

| | |
|---|---|
| Forrest Lauher | Refinery Manager |
| Jerry Barnhill | Environmental Manager (Port Arthur) |
| Bill Irwin | Environmental Manager |
| Massood Modarres | Environmental Engineer |
| Ray Gamble | Environmental Specialist |
| Steve Haug | Environmental Specialist |
| Mark Schoenleber | Environmental Specialist |

Mayer, Brown and Platt

Russ Eggert
Sheila D'Cruz
Ron Hayden
Jonathan Singer

Facility Name:

USEPA #: IL

IEPA #:

# 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 92 | * 19 93 | * 19 94 | Amount on Site | Rate of Generation | Last Manifested Shipment | Disposition |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Dissolved Air Float | DAF unit in WWTP | Listed | K048 | | N/A | G / F | G / F | G / F | 1,520 gal | ~116 bbls Per day | 12/16/94 | → Trade WASTE Ins. Injected in Petroleum Coker |
| API Sludge | API Seperator | Listed | K051 | | N/A | G / F | G / F | G / F | -0- | API out of service | N/A | Injected in Petroleum Coker |
| API Bottom Sludge | Sludge from turnaround + Clean-out | Listed | K051 | | N/A | G / F | G / F | G / F | -0- | " | 7/27/94 | TWI |
| Slop Oil Emulsion Solid | Slop Oil Solids from Tank 161 + 162 and Tank 5-10 | Listed | K049 | | N/A | G / F | G / F | G / F | -0- | VARIES | N/A | Injected in Petroleum Coker |
| Heat Exchanger Bundle Cleaning Sludge | Sludge captured on the Bundle Cleaning Pad | Listed | K050 | | N/A | G / F | G / F | G / F | 25 55-gal Drums | 2,016 gal in 1994 | 11/18/94 | TWI |
| Waste Petroleum Naphtha | Building 502 Parts Washer | S-K | D001 D039 D018 | | N/A | G / F | G / F | G / F | -0- | Serviced by Safety-Kleen | 2/9/95 | Safety-Kleen Caseyville, Il. |
| Primary + Secondary wastewater treat. Sludges | Tank 161 + 162 Surface Imp. Clean out | Listed | F037 F038 | | N/A | G / F | G / F | G / F | -0- | None gen. since 6/94 | 2/10/94 | Peoria Disposal Company |
| Coker Unifiner Spent Catalyst | Spent Catalyst | 1/7/94 | D004 D018 | | N/A | G / F | G / F | G / F | 10 55-gal Drums | Not on Annual Report | 8/11/94 | Amex Metals Recovery Braithwaite, Al. |
| Chromium + Benzene waste | Filters from Reformer | 3/29/94 | D007 D018 | | N/A | G / F | G / F | G / F | 9 25 gal Plastics | VARIES | 3/27/95 | TWI |
| Tank Bottoms | Tank Clean-outs | 8/31/94 | D018 | | N/A | G / F | G / F | G / F | 40 yd³ | VARIES | 1/23/95 | TWI |

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

Facility Name:

USEPA #: IL

IEPA #:

# 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 92 | * 19 93 | * 19 94 | Amount on Site | Rate of Generation | Last Manifested Shipment | Disposition |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| waste MEK | maintenance | Listed | D001 D018 D008 U159 U203 | | N/A | G F | G F | G F | -0- | VARIES | 3/27/95 | TWI |
| Oil Cont Debris | Plant wide | 8/27/94 | N-H | N/A | N/A | G N/A F | G N/A F | G N/A F | 40yd³ | VARIES | 5/3/95 | Chain of Rocks Landfill #923912 |
| Bio-Sludge | WWTP Filter Press | | N-H | N/A | N/A | G N/A F | G N/A F | G N/A F | 40yd³ | 250-300 tons/month | 5/19/95 | Chain of Rocks Landfill |
| | | | | | | 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 | | | | |
| | | | | | | G F | G F | G F | | | | |

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

State of Illinois
ENVIRONMENTAL PROTECTION AGENCY

Mary A. Gade, Director

2009 Mall Street, Collinsville, IL 62234

618/346-5120

Refer to: 1190050002 - Madison County
Clark Refining and Marketing, Inc.
ILD041889203 - FOS

June 7, 1995

Bill Irwin
Environmental Engineer
Clark Refining and Marketing, Inc.
Hawthorne Street, P. O. Box 7
Hartford, Illinois 61048

Dear Mr. Irwin:

Enclosed, please find copies of the photographs taken at your facility during the May 24, 1995 Multi-Media Inspection. If you have any questions, please call me at 618/346-5120.

Sincerely,

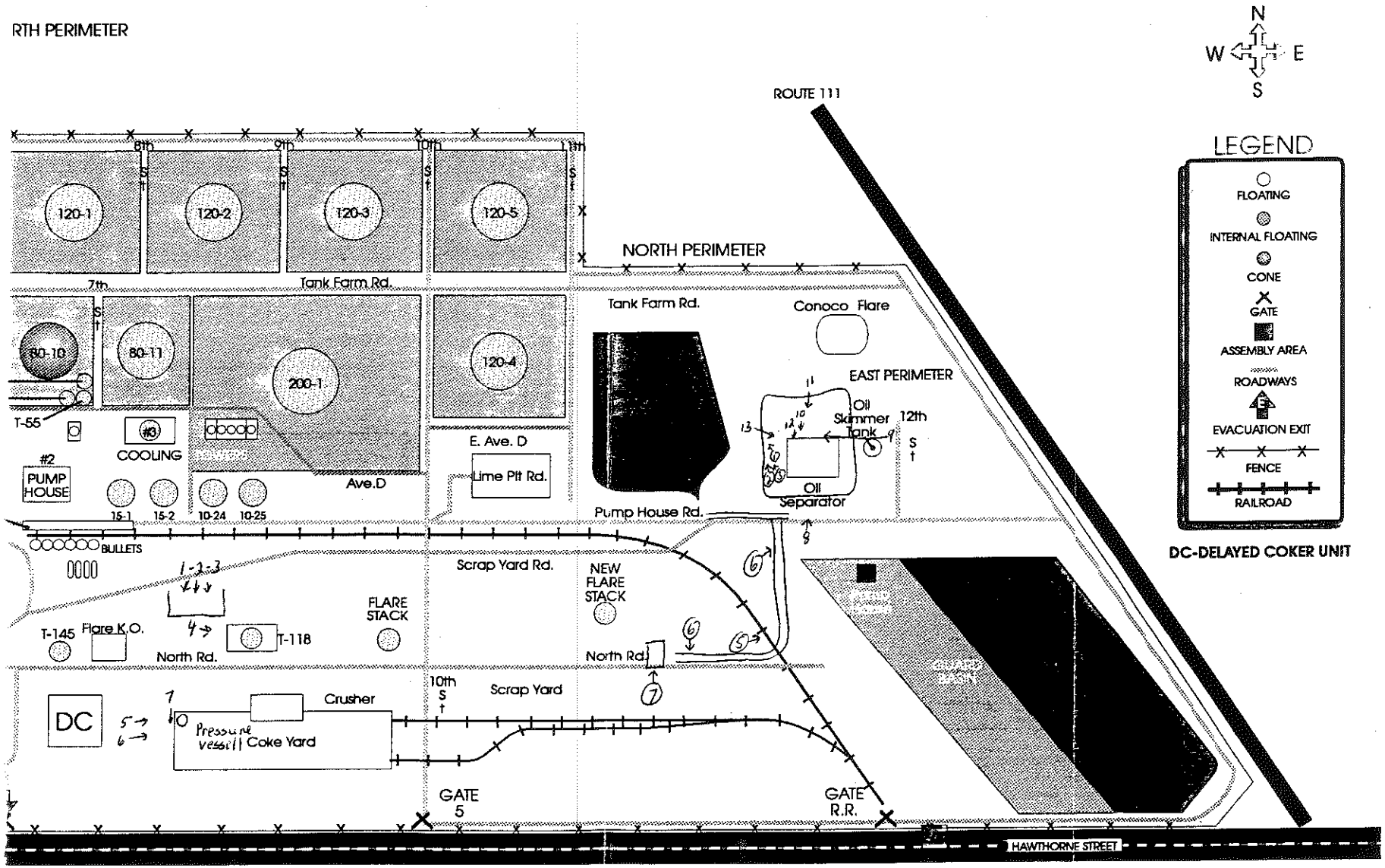
ENVIRONMENTAL PROTECTION AGENCY

Christopher N. Cahnovsky

Christopher N. Cahnovsky, CHMM
Environmental Protection Specialist
Field Operations Section
Bureau of Land

CNC:jlr/1362L
Enclosure

bcc: BOL - Records Unit
bcc: BOL - Collinsville

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① - ⑦ Photos Roll 2591 0 →

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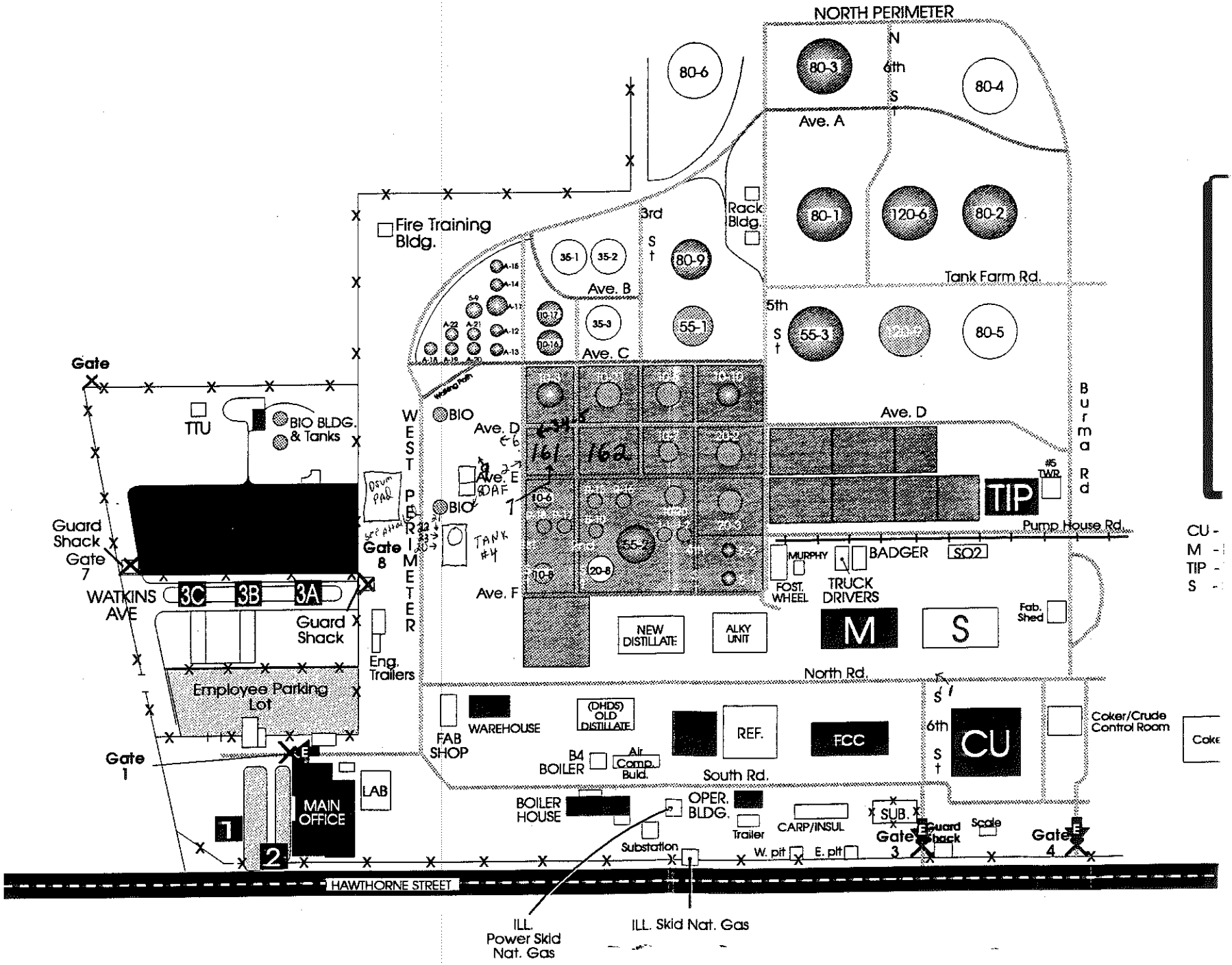
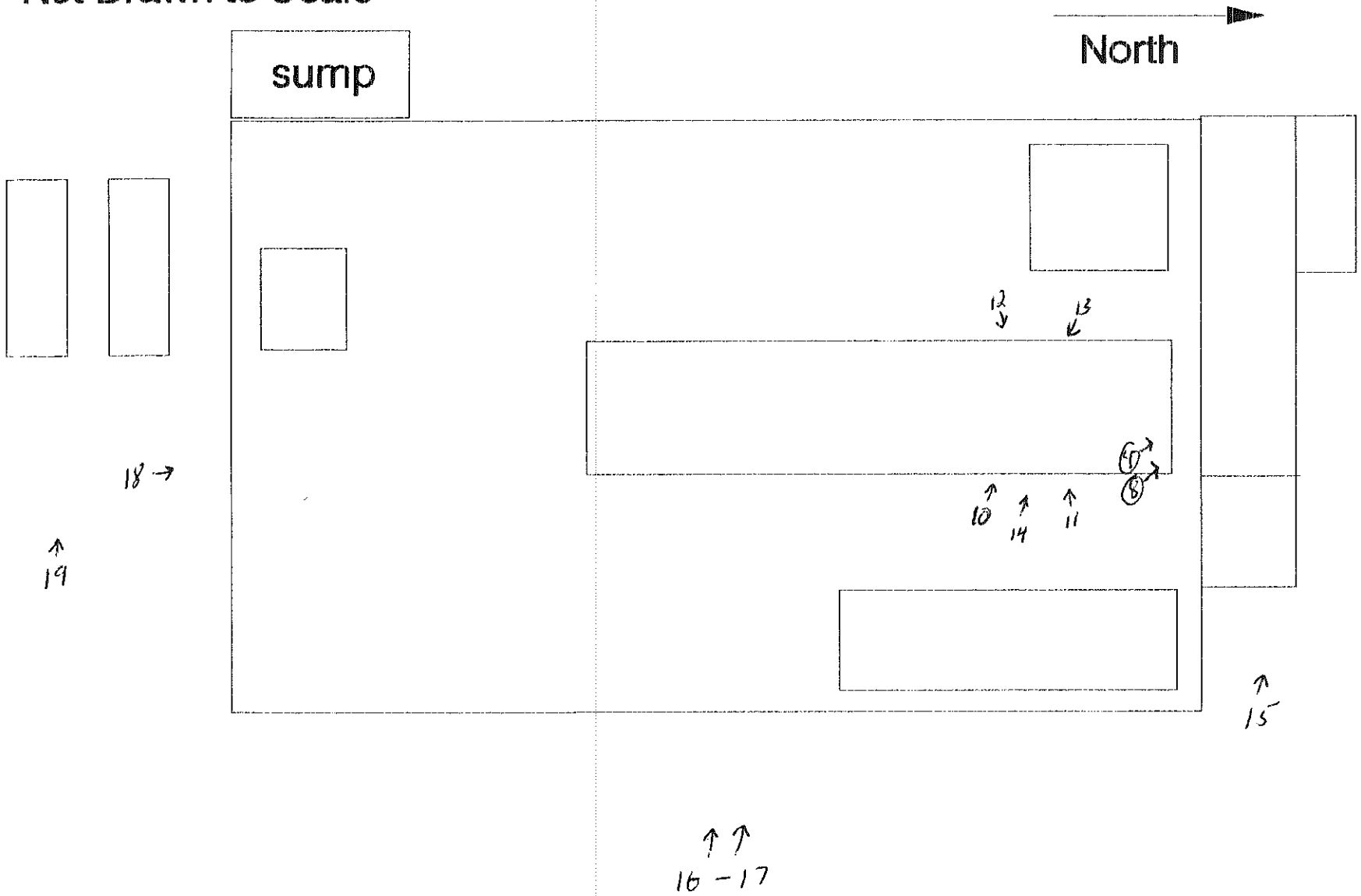

NORTH PERIMETER
N 6th S t
Ave. A
80-6
80-3
80-4
80-1
120-6
80-2
Tank Farm Rd.
5th S t
55-3
120-5
80-5
Rack Bldg.
3rd S t
80-9
55-1
35-1
35-2
Ave. B
35-3
Ave. C
Fire Training Bldg.
Gate
TTU
BIO BLDG. & Tanks
WEST PERIMETER
BIO
Ave. D
Ave. E
Ave. F
161
162
TANK #4
Drum Pad
Gate 8
Guard Shack Gate 7
WATKINS AVE
3C
3B
3A
Guard Shack
Eng. Trailers
Employee Parking Lot
Gate 1
MAIN OFFICE
LAB
1
2
Ave. D
#5 TWR
TIP
Burma Rd
Pump House Rd.
MURPHY
BADGER
SO2
FOST. WHEEL
TRUCK DRIVERS
Fab. Shed
NEW DISTILLATE
ALKY UNIT
M
S
North Rd.
FAB SHOP
WAREHOUSE
(DHDS) OLD DISTILLATE
REF.
FCC
6th S t
CU
Coker/Crude Control Room
B4 BOILER
Air Comp. Bld.
South Rd.
BOILER HOUSE
OPER. BLDG.
Trailer
CARP/INSUL
SUB.
Gate 3
Guard Shack
Scale
Gate 4
Substation
W. pit
E. pit
HAWTHORNE STREET
ILL. Power Skid Nat. Gas
ILL. Skid Nat. Gas

Not Drawn to Scale




DRUM ACCUMULATION PAD

DATE: MAY 22, 1995

TIME: 9:15 - 3:15

I.D. 1190500002

MADISON County

CLARK OIL

PHOTOGRAPH TAKEN TOWARD THE:

NORTHWEST

ROLL# 2589 PHOTO# 1

PHOTOGRAPH BY:

DATE: MAY 22, 1995

TIME: 9:15 - 3:15

I.D. 1190500002

MADISON County

CLARK OIL

PHOTOGRAPH TAKEN TOWARD THE:

NORTHEAST

ROLL# 2589 PHOTO# 2

PHOTOGRAPH BY:

DATE: MAY 22, 1995

TIME: 9:15 - 3:15

I.D. 1190500002

MADISON County

CLARK OIL

PHOTOGRAPH TAKEN TOWARD THE:

SOUTHWEST

ROLL# 2589 PHOTO# 3

PHOTOGRAPH BY:

DATE: MAY 22, 1995

TIME: 9:15 - 3:15

I.D. 1190500002

MADISON County

CLARK OIL

PHOTOGRAPH TAKEN TOWARD THE:

WEST SOUTHWEST

ROLL# 2589 PHOTO# 4

PHOTOGRAPH BY:

DATE: MAY 22, 1995

TIME: 9:15 - 3:15

I.D. 1190500002

MADISON County

CLARK OIL

PHOTOGRAPH TAKEN TOWARD THE:

WEST SOUTHWEST

ROLL# 2589 PHOTO# 5

PHOTOGRAPH BY:

DATE: MAY 22, 1995

TIME: 9:15 - 3:15

I.D. 1190500002

MADISON County

CLARK OIL

PHOTOGRAPH TAKEN TOWARD THE:

WEST

ROLL# 2589 PHOTO# 6

PHOTOGRAPH BY:

DATE: MAY 22, 1995

TIME: 9:15 - 3:15

I.D. 1190500002

MADISON County

CLARK OIL

PHOTOGRAPH TAKEN TOWARD THE:

NORTH

ROLL# 2589 PHOTO# 7

PHOTOGRAPH BY:

DATE: MAY 22, 1995

TIME: 9:15 - 3:15

I.D. 1190500002

MADISON County

CLARK OIL

PHOTOGRAPH TAKEN TOWARD THE:

SOUTH SOUTHWEST

ROLL# 2589 PHOTO# 8

PHOTOGRAPH BY:

IL 532-0603
IDPC 24 (Rev. 9/87)

DATE: MAY 22, 1995

TIME: 9:15 - 3:15

I.D. 1190500002

MADISON County

CLARK OIL

PHOTOGRAPH TAKEN TOWARD THE:

NORTH NORTHWEST

ROLL# 2589 PHOTO# 9

PHOTOGRAPH BY:

DATE:

TIME:

I.D.

County

PHOTOGRAPH TAKEN TOWARD THE:

ROLL# PHOTO#

PHOTOGRAPH BY:

IL 532-0603

DATE: MAY 23, 1995

TIME: 9:00 - 4:30

I.D. 1190500002

MADISON County

CLARK OIL

PHOTOGRAPH TAKEN TOWARD THE:

NORTH WEST

ROLL# 2589 PHOTO# 10

PHOTOGRAPH BY:

DATE: MAY 23, 1995

TIME: 9:00 - 4:30

I.D. 1190500002

MADISON County

CLARK OIL

PHOTOGRAPH TAKEN TOWARD THE:

SOUTHWEST

ROLL# 2589 PHOTO# 11

PHOTOGRAPH BY:

IL 532-0607

DATE: MAY 23, 1995

TIME: 9:00 - 4:30

I.D. 1190500002

MADISON County

CLARK OIL

PHOTOGRAPH TAKEN TOWARD THE:

NORTHEAST

ROLL# 2589 PHOTO# 12

PHOTOGRAPH BY:

DATE: MAY 23, 1995

TIME: 9:00 - 4:30

I.D. 1190500002

MADISON County

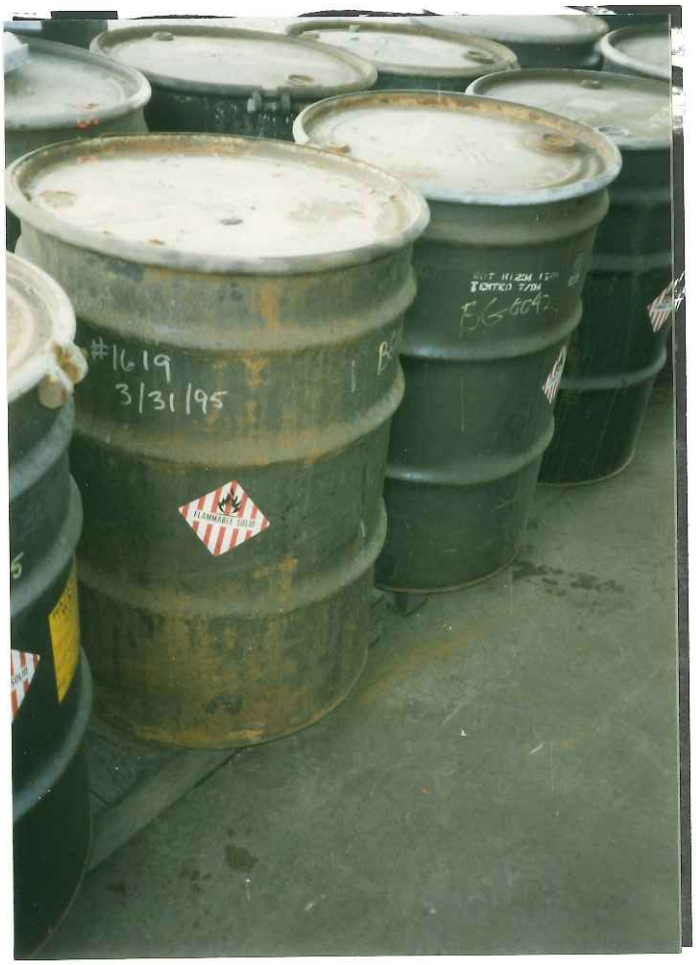
CLARK OIL

PHOTOGRAPH TAKEN TOWARD THE:

SOUTHEAST

ROLL# 2589 PHOTO# 13

PHOTOGRAPH BY:



DATE: MAY 23, 1995

TIME: 9:00 - 4:30

I.D. 1190500002

MADISON County

CLARK OIL

PHOTOGRAPH TAKEN TOWARD THE:

WEST

ROLL# 2589 PHOTO# 14

PHOTOGRAPH BY:

DATE: MAY 23, 1995

TIME: 9:00 - 4:30

I.D. 1190500002

MADISON County

CLARK OIL

PHOTOGRAPH TAKEN TOWARD THE:

WEST

ROLL# 2589 PHOTO# 15

PHOTOGRAPH BY:

DATE: MAY 23, 1995

TIME: 9:00 4:30

I.D. 1190500002

MADISON County

CLARK OIL

PHOTOGRAPH TAKEN TOWARD THE:

WEST NORTHWEST

ROLL# 2589 PHOTO# 16

PHOTOGRAPH BY:

DATE: MAY 23, 1995

TIME: 9:00 4:30

I.D. 1190500002

MADISON County

CLARK OIL

PHOTOGRAPH TAKEN TOWARD THE:

SOUTHWEST

ROLL# 2589 PHOTO# 17

PHOTOGRAPH BY:

IL 532-0603

DATE: MAY 23, 1995

TIME: 9:00 4:30

I.D. 1190500002

MADISON County

CLARK OIL

PHOTOGRAPH TAKEN TOWARD THE:

NORTH

ROLL# 2589 PHOTO# 18

PHOTOGRAPH BY:

DATE:

TIME:

I.D.

County

PHOTOGRAPH TAKEN TOWARD THE:

ROLL# PHOTO#

PHOTOGRAPH BY:

IL 532-0603

DATE: MAY 23, 1995

TIME: 9:00 - 4:30

I.D. 1190500002

MADISON County

CLARK OIL

PHOTOGRAPH TAKEN TOWARD THE:

WEST

ROLL# 2589 PHOTO# 19

PHOTOGRAPH BY:

DATE: MAY 23, 1995

TIME: 9:00 - 4:30

I.D. 1190500002

MADISON County

CLARK OIL

PHOTOGRAPH TAKEN TOWARD THE:

EAST

ROLL# 2589 PHOTO# 20

PHOTOGRAPH BY:

DATE: MAY 23, 1995

TIME: 9:00 - 4:30

I.D. 1190500002

MADISON County

CLARK OIL

PHOTOGRAPH TAKEN TOWARD THE:

SOUTH

ROLL# 2589 PHOTO# 21

PHOTOGRAPH BY:

DATE:

TIME:

I.D.

County

PHOTOGRAPH TAKEN TOWARD THE:

ROLL# PHOTO#

PHOTOGRAPH BY:

IL 532-0603

DATE: MAY 23, 1995

TIME: 9:00 - 4:30

I.D. 1190500002

MADISON County

CLARK OIL

PHOTOGRAPH TAKEN TOWARD THE:

EAST

ROLL# 2589 PHOTO# 22

PHOTOGRAPH BY:

DATE: MAY 23, 1995

TIME: 9:00 - 4:30

I.D. 1190500002

MADISON County

CLARK OIL

PHOTOGRAPH TAKEN TOWARD THE:

EAST SOUTHEAST

ROLL# 2589 PHOTO# 23

PHOTOGRAPH BY:

DATE: MAY 24, 1995

TIME: 8:15 - 3:00

I.D. 1190500002

MADISON County

CLARK OIL

PHOTOGRAPH TAKEN TOWARD THE:

SOUTH SOUTHWEST

ROLL# 2590 PHOTO# 1

PHOTOGRAPH BY:

DATE: MAY 24, 1995

TIME: 8:15 - 3:00

I.D. 1190500002

MADISON County

CLARK OIL

PHOTOGRAPH TAKEN TOWARD THE:

SOUTH

ROLL# 2590 PHOTO# 2

PHOTOGRAPH BY:

DATE: MAY 24, 1995

TIME: 8:15 - 3:00

I.D. 1190500002

MADISON County

CLARK OIL

PHOTOGRAPH TAKEN TOWARD THE:

SOUTH SOUTHEAST

ROLL# 2590 PHOTO# 3

PHOTOGRAPH BY:

DATE: MAY 24, 1995

TIME: 8:15 - 3:00

I.D. 1190500002

MADISON County

CLARK OIL

PHOTOGRAPH TAKEN TOWARD THE:

SOUTHEAST

ROLL# 2590 PHOTO# 4

PHOTOGRAPH BY:

DATE: MAY 24, 1995

TIME: 8:15 - 3:00

I.D. 1190500002

MADISON County

CLARK OIL

PHOTOGRAPH TAKEN TOWARD THE:

EAST

ROLL# 2590 PHOTO# 5

PHOTOGRAPH BY:

IL 532-0603
L/NPC 24 (Rev. 4/87)

DATE: MAY 24, 1995

TIME: 8:15 - 3:00

I.D. 1190500002

MADISON County

CLARK OIL

PHOTOGRAPH TAKEN TOWARD THE:

EAST

ROLL# 2590 PHOTO# 6

PHOTOGRAPH BY:

DATE: MAY 24, 1995

TIME: 8:15 - 3:00

I.D. 1190500002

MADISON County

CLARK OIL

PHOTOGRAPH TAKEN TOWARD THE:

SOUTH

ROLL# 2590 PHOTO# 7

PHOTOGRAPH BY:

DATE: MAY 24, 1995

TIME: 8:15 - 3:00

I.D. 1190500002

MADISON County

CLARK OIL

PHOTOGRAPH TAKEN TOWARD THE:

NORTH

ROLL# 2590 PHOTO# 8

PHOTOGRAPH BY:

DATE: MAY 24, 1995

TIME: 8:15 - 3:00

I.D. 1190500002

MADISON County

CLARK OIL

PHOTOGRAPH TAKEN TOWARD THE:

WEST

ROLL# 2590 PHOTO# 9

PHOTOGRAPH BY:

DATE: MAY 24, 1995

TIME: 8:15 - 3:00

I.D. 1190500002

MADISON County

CLARK OIL

PHOTOGRAPH TAKEN TOWARD THE:

SOUTH

ROLL# 2590 PHOTO# 10

PHOTOGRAPH BY:

DATE: MAY 24, 1995

TIME: 8:15 - 3:00

I.D. 1190500002

MADISON County

CLARK OIL

PHOTOGRAPH TAKEN TOWARD THE:

SOUTH

ROLL# 2590 PHOTO# 11

PHOTOGRAPH BY:

DATE: MAY 24, 1995

TIME: 8:15 - 3:00

I.D. 1190500002

MADISON County

CLARK OIL

PHOTOGRAPH TAKEN TOWARD THE:

SOUTH

ROLL# 2590 PHOTO# 12

PHOTOGRAPH BY:

DATE: MAY 24, 1995

TIME: 8:15 - 3:00

I.D. 1190500002

MADISON County

CLARK OIL

PHOTOGRAPH TAKEN TOWARD THE:

SOUTHEAST

ROLL# 2590 PHOTO# 13

PHOTOGRAPH BY:

DATE: MAY 24, 1995

TIME: 8:15 - 3:00

I.D. 1190500002

MADISON County

CLARK OIL

PHOTOGRAPH TAKEN TOWARD THE:

NORTH NORTHWEST

ROLL# 2591 PHOTO# 1

PHOTOGRAPH BY:

DATE: MAY 24, 1995

TIME: 8:15 - 3:00

I.D. 1190500002

MADISON County

CLARK OIL

PHOTOGRAPH TAKEN TOWARD THE:

NORTH NORTHWEST

ROLL# 2591 PHOTO# 2

PHOTOGRAPH BY:

DATE: MAY 24, 1995

TIME: 8:15 - 3:00

I.D. 1190500002

MADISON County

CLARK OIL

PHOTOGRAPH TAKEN TOWARD THE:

NORTH NORTHWEST

ROLL# 2591 PHOTO# 3

PHOTOGRAPH BY:

DATE: MAY 24, 1995

TIME: 8:15 - 3:00

I.D. 1190500002

MADISON County

CLARK OIL

PHOTOGRAPH TAKEN TOWARD THE:

NORTHEAST

ROLL# 2591 PHOTO# 4

PHOTOGRAPH BY:

DATE: MAY 24, 1995

TIME: 8:15 - 3:00

I.D. 1190500002

MADISON County

CLARK OIL

PHOTOGRAPH TAKEN TOWARD THE:

NORTH NORTHEAST

ROLL# 2591 PHOTO# 5

PHOTOGRAPH BY:

DATE: MAY 24, 1995

TIME: 8:15 - 3:00

I.D. 1190500002

MADISON County

CLARK OIL

PHOTOGRAPH TAKEN TOWARD THE:

SOUTH

ROLL# 2591 PHOTO# 6

PHOTOGRAPH BY:

DATE: MAY 24, 1995

TIME: 8:15 - 3:00

I.D. 1190500002

MADISON County

CLARK OIL

PHOTOGRAPH TAKEN TOWARD THE:

NORTH

ROLL# 2591 PHOTO# 7

PHOTOGRAPH BY:

DATE: MAY 24, 1995

TIME: 8:15 - 3:00

I.D. 1190500002

MADISON County

CLARK OIL

PHOTOGRAPH TAKEN TOWARD THE:

NORTHWEST

ROLL# 2591 PHOTO# 8

PHOTOGRAPH BY:

IL 532-0603
L/NPC 24 (Rev. 9/87)

DATE: MAY 24, 1995

TIME: 8:15 - 3:00

I.D. 1190500002

MADISON County

CLARK OIL

PHOTOGRAPH TAKEN TOWARD THE:

NORTH NORTHWEST

ROLL# 2591 PHOTO# 9

PHOTOGRAPH BY:

DATE:

TIME:

I.D.

County

PHOTOGRAPH TAKEN TOWARD THE:

ROLL# PHOTO#

PHOTOGRAPH BY:

IL 532-0603
L/NPC 24 (Rev. 9/87)

STATE OF ILLINOIS

ENVIRONMENTAL PROTECTION AGENCY DIVISION OF LAND POLLUTION CONTROL

P.O. BOX 19276 SPRINGFIELD, ILLINOIS 62794-9276 (217) 782-6761

State Form LPC 62 8/81 IL532-0610

FOR SHIPMENT OF HARDOUS AND SPECIAL WASTE

NOTE: FORM DESIGNED TO PRINT 8 LINES PER INCH.

EPA Form 8700-22 (Rev. 6-89)

Form Approved. OMB No. 2050-0039, Expires 9-30-92

# UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: ILD041889023

Manifest Document No.: 20127

2. Page 1. of 1

Information in the shaded areas is not required by Federal law, but is required by Illinois Law.

3. Generator's Name and Mailing Address: Clark Refining & Marketing, 201 East Hawthorne, Hartford, IL 62048

Location If Different:

4. * 24 HOUR EMERGENCY AND SPILL ASSISTANCE NUMBERS *: (618)254-7301, (800)765-8713

A. Illinois Manifest Document Number: IL 4704915 — Fee Paid, If Applicable

B. Illinois Generator's ID: 1 1 1 9 0 5 0 0 0 0 2

5. Transporter 1 Company Name: Chemical Waste Management

6. US EPA ID Number: ILD099202681

C. Illinois Transporter's ID: 0 0 7 5

D. (618) 271-2804 Transporter's Phone

7. Transporter 2 Company Name:

8. US EPA ID Number:

E. Illinois Transporter's ID:

F. ( ) Transporter's Phone

9. Designated Facility Name and Site Address: Trade Waste Incineration, #7 Mobile Avenue, Sauget, IL 62201

10. US EPA ID Number: ILD098642424

G. Illinois Facility's ID: 1 6 3 1 2 1 0 0 0 9

H. Facility's Phone: (618 271-2804

GENERATOR

| 11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) | 12. Containers No. | Type | 13. Total Quantity | 14. Unit Wt/Vol | I. Waste No. |
|---|---|---|---|---|---|
| a. Hazardous Waste, Solid, N.O.S., (Chromium, Benzene), 9, NA3077, PG III, RQ(D007,D018) | 018 | DF | 004500 | G | EPA HW Number: XXD007; Authorization Number: 09001 |
| b. | | | | | EPA HW Number: XX; Authorization Number: |
| c. | | | | | EPA HW Number: XX; Authorization Number: |
| d. | | | | | EPA HW Number: XX; Authorization Number: |

J. Additional Descriptions for Materials Listed Above: D018
Profile # BG0043
Central Service TASP Project # 21026
Drum #'s 1111-1,2; 1112-1,2; 1113-1,2; 1114-1,2; 1165-1,2; 1166-1,2; 1167-1,2; 1168-1,3; 1169-1,2

K. Handling Codes for Wastes Listed Above in Item # 14

G = Gallons Y = Cubic Yards

15. Special Handling Instructions and Additional Information

for Discrepancy Call: Jay Ross (618)251-3940

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health anf the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed / Typed Name: MASSOOD MODARRES — Signature: [signature] — Date: Month 04 Day 01 Year 94

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed / Typed Name: DAVID HALAVONICH — Signature: [signature] — Date: Month 04 Day 01 Year 94

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed / Typed Name: — Signature: — Date: Month Day Year

FACIL.

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hardous materials covered by this manifest except as noted in item 19.

Printed / Typed Name: Michelle S McCoy — Signature: Michelle S McCoy — Date: Month 04 Day 01 Year 94

This Agency is authorized to require, pursuant to Illinois Revised Statute, 1989, Chapter 111 1/2, Section 1004 and 1021, that this information be submitted to the Agency. Failure to provide this information may result in a civil penalty against the owner or operator not to exceed $25,000 per day of violation. Falsification of this information may result in a fine up to $50,000 per day of violation and imprisonment up to 5 years. This form has been approved by the Forms Management Center.

00390

COPY 1. TSD MAIL TO GENERATOR COPY

~~50235~~ 50325

In case of a spill call the Illinois Office of Emergency Response at 217/782-7860 and the National Response Center at 800/424-8802 or 202/426-2675.

STATE OF ILLINOIS

SAFETY-KLEEN CORP. P.O. BOX 19276 SPRINGFIELD, ILLINOIS 62794-9276 (217) 782-6761 FOR SHIPMENT OF HAZARDOUS AND SPECIAL WASTE.

STATE PRESCRIBED FORM State Form LPC 62 8/81 IL532-0610

5-160-02

NOTE: FORM DESIGNED TO PRINT 8 LINES PER INCH EPA Form 8700-22 (6-89) Form Approved. OMB No. 2050-0039 Expires 9-30-94

# UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. ILD 041889023 | Manifest Document No. 81799 | 2. Page 1 of 1

Information in the shaded areas is not required by Federal law, but is required by Illinois law.

3. Generator's Name and Mailing Address: CLARK BUILDING 502 HARTFORD

Location if Different: 210 E HAWTHORN IL 62048

A. Illinois Manifest Document Number: IL 5500650 MANIFEST FEE PAID

B. Illinois Generator's ID: 1190500002

4. Generator's Phone: (618) 254-7301

5. Transporter 1 Company Name: SAFETY-KLEEN CORP. | 6. US EPA ID Number: ILD 984908202

C. Illinois Transporter's ID: 1123

D. 618 398-6880 Transporter's Phone

7. Transporter 2 Company Name | 8. US EPA ID Number

E. Illinois Transporter's ID

F. ( ) Transporter's Phone

9. Designed Facility Name and Site Address 516002: SAFETY-KLEEN CORP. 20 TUCKER DRIVE CASEYVILLE, IL 62232 | 10. US EPA ID Number: ILD 981097819

G. Illinois Facility's ID: 1630250007

H. Facility's Phone: 618 398-6880

| 11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number) | 12. Containers No. | Type | 13. Total Quantity | 14. Unit Wt/Vol | I. Waste No. |
|---|---|---|---|---|---|
| a. ~~WASTE COMBUSTIBLE LIQUID, N.O.S. (PETROLEUM NAPHTHA) NA1993 PGIII (D001, D006, D008, D018, D035, D039, D040)~~ | | ~~DM~~ | | ~~G~~ | EPA HW Number ~~X X D001~~ Authorization Number ~~000353~~ |
| b. RG WASTE COMBUSTIBLE LIQUID, N.O.S. (PETROLEUM NAPHTHA) NA1993 PGIII (D001, D006, D008, D018, D035, D039, D040) | 004 | DM | 00083 | G | EPA HW Number X X D001 Authorization Number 000353 |
| c. | | | | | EPA HW Number X X Authorization Number |
| d. | | | | | EPA HW Number X X Authorization Number |

J. Additional Descriptions for Materials Listed Above: I(A) D039 D018 (A) D006, D008, D035, D040; I(B) D039 D018 (B) D006, D008, D035, D040

K. Handling Codes for Wastes Listed Above in Item #14: G = Gallons Y = Cubic Yards

15. Special Handling Instructions and Additional Information: 9426 69398170 7B1799 5-160-02-3082 03

EMERGENCY RESP#708-888-4660 24HR SKDOT# A: 501 B: 585 C: D:

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations, and Illinois regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: MASOOD MADANI | Signature | Date: Month Day Year

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name: WILLIAM SHADNICK | Signature | Date: Month Day Year

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name | Signature | Date: Month Day Year

FACILITY

19. Discrepancy Indication Space: 11a WASTE STILL WAS NOT PICKED UP

20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.

Printed/Typed Name | Signature | Date: Month Day Year

This Agency is authorized to require, pursuant to Illinois Revised Statutes 1989, Chapter 111½ Sections 1004 and 102, that this information be submitted to the Agency. Failure to provide the information may result in a civil penalty against the owner or operator not to exceed $25,000 per day of violation. Falsification of this information may result in a fine up to $50,000 per day of violation and imprisonment up to 5 years. This form has been approved by the Forms Management Center.

00386

COPY 6. GENERATOR COPY

In case of a spill call the Illinois Office of Emergency Response at 217/782-3637 and the National Response Center at 800/424-8802 or 202/426-2675.

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WMD RCRA AUG 12 1993
RECORD CENTER

Compliance

*Illinois Environmental Protection Agency*
*Division of Land Pollution Control*

# RCRA INSPECTION REPORT

| | |
|---|---|
| USEPA #: IL D 0 4 1 8 8 9 0 2 3 | IEPA #: 1 1 9 0 5 0 0 0 0 2 |
| Facility Name: Clark Oil & Refining | Phone #: 618/254-7301 |
| Street Address: Hawthorne Street, P. O. Box 7 | County: Madison |
| City: Hartford | State: Illinois Zip: 62048 |
| Region: 6 | Inspection Date: 06 / 30 / 93 From: 9:30 a.m. To: 3:15 p.m. |
| Weather: Sunny 88°F | |

***TYPE OF FACILITY***

| | |
|---|---|
| Notified As: Generator | Regulated As: G/S/D |
| LDF? Yes (Yes or No) HPV? Yes | 90-Day F/U Required?: YES X 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: 08 / 18 / 80 , from (initial) or (subsequent) Notification.

Initial Part A Date: 11 / 18 / 80 Amended: ___ / ___ / ___

Part A Withdrawal requested: 11 / 23 / 82 Approved by (US) (IL) EPA: 12 / 15 / 83

***PART B PERMIT APPLICATION***

Part B Permit Submitted: Y or (N) ___ / ___ / ___ Final Permit Issued: ___ / ___ / ___

***ENFORCEMENT***

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JUL 26 1993
IEPA-DLPC

Has the firm been referred to -- USEPA: Y or N ___ / ___ / ___

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

***ORDERS ISSUED***

CACO: ___ / ___ / ___ CAFO: ___ / ___ / ___ 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 1990 | 1991 | 1992 |
|---|---|---|---|---|---|---|---|---|---|
| S04 | No | No | Yes | No | No | No | N/A | No | No |
| | | | | | | | | | |
| | | | | | | | | | |
| | | | | | | | | | |
| | | | | | | | | | |
| | | | | | | | | | |
| | | | | | | | | | |

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AUG 02 1993
OFFICE OF RCRA
WASTE MANAGEMENT DIV.
EPA, REGION

IL 532-1834
LPC-334 (12/89) Page 1

| | | | |
|---|---|---|---|
| Name | Clark Oil and Refining | Name | Clark Oil and Refining |
| Address | 8182 Maryland Avenue | Address | 8182 Maryland Avenue |
| City | St. Louis | City | St. Louis |
| State | Missouri Zip 63105 | State | Missouri Zip 63105 |
| Phone # | 314/889-9600 | Phone # | 314/889-9600 |

| PERSON(S) INTERVIEWED | TITLE | PHONE # |
|---|---|---|
| Richard Thomas | Environmental Engineer | 618/254-7301 |
| Bill Irwin | Environmental Engineer | 618/254-7301 |
| | | |
| | | |
| | | |
| | | |

| INSPECTION PARTICIPANT(S) | AGENCY/TITLE | PHONE # |
|---|---|---|
| Chris Cahnovsky | IEPA/EPS II | 618/346-5120 |
| | | |
| | | |
| | | |

| PREPARED BY | AGENCY/TITLE | PHONE # |
|---|---|---|
| [signature] | IEPA/EPS II | (618) 346-5120 |

# SUMMARY OF APPARENT VIOLATIONS

*Previously Alleged Violations

| Area | Class | Section | |
|---|---|---|---|
| DOR | 1 | 703.121(a) | * |
| DOR | 1 | 703.150(a) | * |
| DGS | 1 | 725.113(b) | * |
| DMR | 2 | 725.175 | * |
| DGW | 1 | 725.190(a) | * |
| DGW | 1 | 725.191(a) | * |
| DGW | 1 | 725.192(a) | * |
| DCL | 1 | 725.212(a) | * |
| DCL | 1 | 725.218(a) | * |
| | 1 | 725.242(a) | * |
| DFR | 1 | 725.244(a) | * |
| | | | |
| | | | |

| Area | Class | Section |
|---|---|---|
| GGR | 1 | 722.111 |
| GMR | 1 | 722.123(a) |
| GPT | 1 | 722.134(a) |
| | | 725.131 |
| | | 725.292(g) |
| | | 725.296(b) |
| | | 725.295(a) |
| GPT | 1 | 722.134(c) |
| GRR | 2 | 722.140(c) |
| DGS | 2 | 725.115(a) |
| DGS | 2 | 725.115(b) |
| DGS | 1 | 725.116(a) |
| DCP | 2 | 725.152(b) |

| Area | Class | Section |
|---|---|---|
| DMR | 2 | 725.173 |
| DSI | 1 | 725.323 |
| DSI | 2 | 725.326 |
| GLB | 1 | 728.107(a)(7) |
| GLB | 1 | 728.107(a)(5) |
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Facility Name: Clark Oil and Refinery
USEPA #: IL D041889023
IEPA #: 1190500002

# 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 91 | * 19 92 | Amount on Site | Rate of Generation | Last Manifested Shipment | Disposition |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Dissolved Air Float | DAF unit in WWTP | Listed | K048 | yes | N/A | G N/A F | G N/A F | G N/A F | ~7800 gal | ~116 barrels per day | N/A | Reused to produce Petroleum Coke 721.106a)3)I |
| Slop oil Emulsion Solid | WWTP | Listed | K049 | Yes | | G N/A F | G N/A F | G N/A F | Included Above | Included Above | N/A | Same as above. |
| API sludge | API seperator | Listed | K051 | yes | | G N/A F | G N/A F | G N/A F | Included Above | Included Above | N/A | Same as above |
| API bottom sludge | Sludge from bottom of API Produced Turnaround | Listed | K051 | yes | | G F | G F | G N/A F | -0- | During Turnaround of API | 2/9/92 | Clayton Chemical |
| Waste petr. Naptha | S-K parts washer | S-K | D001 D039 D018 | yes | | G F | G F | G F | -0- | Every 2 weeks | 5/17/93 | Safety-Kleen |
| Leaded paint Chips | painting operations | 8/4/92 | D008 | yes | | G N/A F | G N/A F | G F | -0- | VARIES | 12/15/92 | Controlled WASTE Division. |
| Refinery I° + II° sludges | WWTP Clean out of ditches | Listed | F037 F038 | NO | NO | G N/A F | G F | G F | 24,420 cu. yd. | N/A | 4/29/93 | CWM of Indiana Ft. Wyane |
| Heat Exchanger Bundel Cleaning Sludge | Clean-up of spills & from Cleaning B. | Listed | K050 | yes | N/A | G N/A F | G N/A F | G N/A F | ~100 yd | During Turnaround + spill Clean-up | 5/30/93 | → discharge to WWTP → CWM - Sulfur Al. |
| Tetra Ethyl lead | Tank Clean-out of Chemical Additives | P waste | P110 | yes | N/A | G N/A F | G N/A F | G F | -0- | one-time | 9/23/92 | TWI |
| Coker unifiner spent Catylist | spent Catylist | Process Knowledge | D001 | yes | N/A | G N/A F | G N/A F | G N/A F | -0- | VARIES | 5/11/93 | Amax Metals Recovery, In Braithwaite Al |

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

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**REMARKS**

On June 30, 1993, a Compliance Evaluation Inspection was conducted at Clark Oil and Refinery Corporation (Clark). Present during this inspection were Chris Cahnovsky, IEPA; Richard Thomas and Bill Irwin, Clark.

Clark operates a 60,000 barrel per day refinery in Hartford, Illinois. Clark produces several hazardous wastestreams at this facility. These streams include DAF float (K048), Slop Oil Emulsion Solids (K049), Heat Exchanger Bundle Cleaning Sludge (K050), API Separator Sludge (K051), Waste Petroleum Naphtha (D001), leaded paint chips (D008), coker unifier spent catalyst (D001) and Refinery Primary and Secondary Sludge (F037 and F038). Clark operates a 90 day drum accumulation area and a 90 day accumulation tank (Tank 4) under generator status.

No waste was observed in the 90 day drum accumulation area (Photo 7). The K048, K049, and K051 wastestreams are reused to produce petroleum coke. These wastes are pumped to Tank 4 for temporary storage prior to be taken to the Coker unit. This waste is transferred from Tank 4 to Tank T1-18 via a vacuum truck. T1-18 is a tank located at the Coker unit which is used to feed the injection tank on the unit. This waste is introduced to the initial quench phase of the Coke producing operation. This recycling process, including Tank T1-18 is exempt pursuant to 721.106(c)(1). However not all K051 generated is used in the manner described above. During turnaround, the heavier K051 sludge which settles to the bottom of the separator, is removed and shipped off site. The last shipment of this waste was March 9, 1992. Turnaround refers to the process of shutting down the unit or process to provide necessary repairs and maintenance.

Tank 4 is not part of this recycling process and is regulated as a 90 day accumulation tank (Photos 1-6). The waste accumulated in this tank include K048, K049 and K051. Tank 4 was constructed in 1948 and put into service as a hazardous waste accumulation tank between 1988 and 1989. This tank system has secondary containment. No independent tank assessment was available for this tank. This is an apparent violation of 722.134(a) specifically 725.292(g).

A sign with the words hazardous waste was observed on the outside of the secondary containment at Tank 4. Per an operator at this unit, Tank 4 contained 25.71 feet of waste, which correlates to 7,800 gallons. This exceeds the capacity of a satellite container. There was no accumulation start date on this sign, which states the date on which the 90 accumulation begins.

When the sludges settle to the bottom of this tank, the water rises to the top and the water is then drawn off. During this water draw down process, sludge was released into the secondary containment. Per Mr. Thomas, this drawn down occurred during the day shift on June 29, 1993. Per Mr. Irwin, the day shift goes from 8:00 a.m. to 4:00 p.m., but the operators leave at 3:00 p.m. The waste was still present in the secondary containment after 3:00 p.m. Apparently, this waste has been in the secondary containment area for more than 24 hours (Photos 3 & 4). This is an apparent violation of 722.134(a), specifically 725.296(b)(2). Inspections are being conducted at this tank every four hours. However, these inspections are not documented correctly, per Section 725.295, subsections (a) and (b). This is an apparent violation of 722.134(a), specifically 725.295(a).

At Tank 4, a satellite drum is being utilized below the hose/piping outside the containment area to collect oily liquid. This drum was observed with the lid not fully closed, constituting an open container (Photo 5). This is an apparent violation of 722.134(c).

The K050 wastestream is only generated during the turnaround on heat exchangers. The sludge (K050) is removed from the heat exchanger bundles by high pressure water spray at the bundle cleaning pad. This sludge is washed into the process sewers and treated at the facility's wastewater treatment plant. During this inspection, sludge was observed on the pad and on the gravel behind the pad (Photo 11-12). At this time, no one was observed working in the area. The sludge should have been completely cleaned off the pad before the workers left the area. This is an apparent violation of 722.134(a), specifically 725.131.

During the review of Clark's manifests and waste analysis, the following deficiencies were observed. Manifest IL5231860 (attached) dated March, 3 1992, did not have a Land Disposal Restriction Notification attached. This is an apparent violation of 728.107(a)(7). Manifest INA0624516 (attached) did not have a date when a load of F037 and F038 was received by the transporter. This is an apparent violation of 722.123(a). Process knowledge was used to determine the hazardous characteristics of coker unifier spent catalyst (D001). However, no documentation has been kept on file to verify this waste determination and the treatment standard for the Land Disposal Restriction regulations. These are apparent violations of 722.140(c) and 728.107(a)(5), respectively.

Clark produced their Emergency Response Plan to satisfy the requirements of the RCRA contingency plan. After a review of this document, the following deficiencies were noted. This plan did not include specific areas of hazardous waste management, such as the drum accumulation pad, Tank 4 and the Guard Basin. Also, The plan did not include what actions facility personnel must take in case of any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents from these areas. This is an apparent violation of 725.152(b). Clark is in the process of revising their contingency plan. This revision should include the above comments.

Clark conducts annual training. However, no written outline of the training program to satisfy the requirements of RCRA could be produced, only a video of the training was available. Per Mr. Irwin, the video does not contain training of the operations conducted at of the drum accumulation pad, Tank 4 and the Guard Basin and what facility personnel must do in case of a release of hazardous waste. Since there are deficiencies in the contingency plan the employees need to be trained on implementation of the corrected contingency plan. This is an apparent violation of 725.116(a).

On October 27, 1992, Clark informed the Agency that primary wastewater treatment sludge (F037) and secondary wastewater treatment sludge (F038) may have impacted the Guard Basin and the ditches leading to the Guard Basin (Photos 1 & 2). The Guard Basin is an earthen surface impoundment that manages stormwater and receives some process water. The F037 and F038 listing came into effect in November, 1990 (Federal Register/Vol. 55, No 213 November 2, 1990). Before this rule, the Guard Basin received dry weather flow from the wastewater treatment system. In 1991, Clark decided to prevent all dry weather flow from entering the Guard Basin. Clark constructed an overflow and underflow weir and a concrete pit to contain process water and stormwater before being pumped to the wastewater treatment plant (Photo 3 & 4). Between August and October, 1992, Clark determined that their efforts to prevent all dry weather flow from the Guard Basin were unsuccessful. Since the Guard Basin received dry weather flow, this basin is considered a hazardous waste surface impoundment. Clark's intentions are to remove all sludges from this basin and ship it off-site as F037 and F038 before June 30, 1994. This is when F037 and F038 from the cleaning out of a surface impoundment becomes regulated under the Land Disposal Restrictions, pursuant to Part 728. Clark initiated a sampling and analysis plan and determined there are approximately 24,420 cu. yards of sludge in the guard basin.

Per Mr. Bill Irwin, the ditches from the hard piping to the Guard Basin have received F037 and F038. Between June 9, 1992 and August 16, 1992, 10,623,840 pounds of F037 and F038 sludge were removed from the ditches leading to the Guards Basin and were shipped off-site to Chemical Waste Management of Indiana.

Currently, Clark is attempting to prevent all flow to the Guard Basin. Three pipes to the Guard Basin have been blocked off and the wastewater is being pumped to the WWTP. Per Mr. Thomas, the only water currently going into the Guard Basin is stormwater that enters the system beyond these blockages. The stormwater that reaches the basin is then pumped to the WWTP.

The Guard Basin, weir and concrete pit were inspected during this site visit. Proper freeboard is being maintained in the Guard Basin. The earthen containment dikes that surround the basin are not constructed to minimize wind and water erosion. This is an apparent violation of 725.323. Inspections of this area are not being conducted on a daily basis. This is an apparent violation of 725.115(a) and (b) and 725.326. Also, no operating records are being maintained for the Guard Basin. This is an apparent violation of 725.173.

The concrete basin that holds the wastewater and stormwater, before being pumped back to the WWTP, appeared to have had a release of wastewater from this system (Photos 5, 6 & 7). This also, is an apparent violation of 722.134(a), specifically 725.131.

During the inspection of these areas, 13 drums of soil from the instillation of groundwater monitoring wells were observed next to the pump house at the Guard Basin (Photo 8). Per, Mr. Thomas the analytical data for this soil has been obtained. Clark supplied the Agency with this information on July 2, 1993 (attached). No TCLP analysis has been obtained of the soils in these drums. This is an apparent violation of 722.111. The Agency requests that the TCLP be conducted of the soils in these drums. The Agency would like duplicate samples of this waste.

As a result of this inspection, the following violations have been alleged (a detailed summary of these apparent violations are given in attachment A of this Remarks page):

722.111
722.123(a)
722.134(a) - Specifically 725.131, 725.292(g), 725.296(b)(2), 725.295(a)
722.134(c)
722.140(c)
725.115(a) and (b)
725.116(a)
725.152(b)
725.173
725.323
725.326
728.107(a)(7)
728.107(a)(5).

The following is a list of previous alleged violations found during an October 28, 1992, record inspection:

| | |
|---|---|
| 703.121(a) | 725.192(a) |
| 703.150(a) | 725.212(a) |
| 725.113(b) | 725.218(a) |
| 725.175 | 725.242(a) |
| 725.190(a) | 725.244(a) |
| 725.191(a). | |

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ATTACHMENT A

1. Pursuant to 35 Ill. Adm. Code 722.111, a person who generates a solid waste as defined in Section 721.102, must determine if that waste is a hazardous waste using the following method:

   a. He should first determine if the waste is excluded from regulation under Section 721.104.

   b. He must then determine if the waste is listed as a hazardous waste in Subpart D of Part 721.

Note: Even if a waste is listed, the generator still has an opportunity under Section 720.122 and 40 CFR Section 260.22 to demonstrate that the waste from his particular facility or operation is not a hazardous waste.

   c. If the waste is not listed as a hazardous waste in Subpart D of Part 721, he must determine whether the waste is identified in Subpart C of Part 721 by either:

      1. Testing the waste according to the methods set forth in Subpart C of Part 721, or according to an equivalent method approved by the Board under Section 720.120; or

      2. Applying knowledge of the hazard characteristic of the waste in light of the materials or the processes used.

You are in apparent violation of Section 722.111 for the following reason: Failure to obtain a waste determination for 13 drums of soil from groundwater monitoring well installation.

Note: The Agency would also like the opportunity to split samples of this waste.

2. Pursuant to 35 Ill. Adm. Code 722.123(a), a generator must:

   1. Sign the manifest certification by hand;

   2. Obtain the handwritten signature of the initial transporter and the date of acceptance on the manifest;

   3. Retain one copy of the manifest in accordance with the requirements of Section 722.140(a);

   4. Send one copy of the manifest to the Agency within two working days of initiating the manifest.

You are in apparent violation of 35 Ill. Adm. Code 722.123(a) for the following reason: Failure to obtain the date of acceptance by the transporter on manifest number INA0624516

3. Pursuant to 35 Ill. Adm. Code 722.134(a), except as provided in subsections (d), (e) or (f), a generator may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status provided that:

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

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

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

   4. The generator complies with the requirements for owners or operators in 35 Ill. Adm. Code 725 Subparts C (Preparedness and Prevention) and D (Contingency Plan and Emgergency Procedures) and with 35 Ill. Adm. Code 725.116 (Personnel Training).

You are in apparent violation of 35 Ill. Adm. Code 722.134(a) in that items 1 and 4 above were not complied with.

Specifically, the requirements of item 1 and/or 4 above (listed by regulation) which were not complied with, as well as the deficiencies observed, are:

Pursuant to 35 Ill. Adm. Code 725.131, facilities must be maintained and operated to minimize the possibility of a fire, explosion or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil or surface water which could threaten human health or the environment. You are in apparent violation of 35 Ill. Adm. Code 725.131 for the following reasons: Waste was observed on the heat exchanger bundle cleaning pad and on the ground behind this pad. Also, waste was observed on the ground around the concrete pit.

Pursuant to 35 Ill. Adm. Code 725.292(g), the owner and operator must obtain and keep on file at the facility written statements by those persons required to certify the design of the tank system and supervise the installation of the tank system in accordance with the requirements of subsections (b) through (f) to attest that the tank system was properly designed and installed and that repairs, pursuant to subsections (b) and (d) were performed. These written statements must also include the certification statement as required in 35 Ill. Adm. Code 702.126(d).

You are in apparent violation of 35 Ill. Adm. Code 725.292(g) for the following reason: Failure to obtain an independent, certified written assessment for Tank 4.

Pursuant to 35 Ill. Adm. Code 725.295(a), the owner or operator shall inspect, where present, at least once each operating day:

1. Overfill/spill control equipment (e.g., waste-feed cutoff systems, bypass systems and drainage systems) to ensure that it is in good working order;

2. The aboveground portion of the tank system, if any, to detect corrosion or releases of waste;

3. Data gathered from monitoring equipment, (e.g., pressure and temperature gauges, monitoring well(s)) to ensure that the tank system is being operated according to its design; and

4. The construction materials and the area immediately surrounding the externally accessible portion of the tank system including secondary containment structures (e.g., dikes) to detect erosion or signs of releases of hazardous waste (e.g., wet spots, dead vegetation);

   (Board Note: Section 725.115(c) requires the owner or operator to remedy any deterioration or malfunction the owner or operator finds. Sections 725.296 requires the owner or operator to notify the Agency within 24 hours of confirming a release. Also, 40 CFR 302 (1986) may require the owner or operator to notify the National Response Center of a release.

You are in apparent violation of 35 Ill. Adm. Code 725.295(a) for the following reason: Proper inspections are not being documented pursuant to this Section.

Pursuant to 35 Ill. Adm. Code 725.296, a tank system or secondary containment system from which there has been a leak or spill, or which is unfit for use, must be removed from service immediately. The owner or operator shall satisfy the following requirements:

a. Cease using; prevent flow or addition of wastes. The owner or operator shall immediately stop the flow of hazardous waste into the tank system or secondary containment system and inspect the system to determine the cause of the release.

b. Removal of waste from tank system or secondary containment system.

1. If the release was from the tank system, the owner or operator shall, within 24 hours after detection of the leak, remove as much of the waste as is necessary to prevent further release of hazardous waste to the environment and to allow inspection and repair of the tank system to be performed.

2. If the release was to a secondary containment system, all released materials must be removed within 24 hours to prevent harm to human health and the environment.

c. Containment of visible releases to the environment. The owner or operator shall immediately conduct a visual inspection of the release and, based upon that inspection:

1. Prevent further migration of the leak or spill to soils or surface water; and

2. Remove, and properly dispose of, any visible contamination of the soil or surface water.

You are in apparent violation of 35 Ill. Adm. Code 725.296 for the following reason: Failure to comply with (b)(2) of this Section, specifically, waste from the water draw down at Tank 4 was in the secondary containment area for more than 24 hours.

4. Pursuant to 35 Ill. Adm. Code 722.134(c):

1. A generator may accumulate as much as 55 gallons of hazardous waste or one quart of acutely hazardous waste listed in 35 Ill. Adm. Code 721.133(e) in containers at or near any point of generation where wastes initially accumulate, which is under the control of the operator of the process generating the waste, without a permit or interim status and without complying with paragraph (a) provided the generator:

A. Complies with 35 Ill. Adm. Code 725.271, 725.272 and 725.273(a) (Use and Management of Containers); and

B. marks the generator's containers either with the words "Hazardous Waste" or with other words that identify the contents of the containers.

2. A generator who accumulates either hazardous waste or acutely hazardous waste listed in 35 Ill. Adm. Code 721.133(e) in excess of the amounts listed in Subsection (c)(1) at or near any point of generation must, with respect to that amount of excess waste, comply within three days with Subsection (a) or other applicable provisions of this chapter. During the three day period the generator must continue to comply with Subsection (c)(1). The generator must mark the container holding the excess accumulation of hazardous waste with the date the excess amount began accumulating.

You are in apparent violation of 35 Ill. Adm. Code 722.134(c) for the following reason: Failure to close the satellite drum at Tank 4.

5. 35 Ill. Adm. Code 722.140(c) requires the generator to keep records of any test results, waste analyses or other determinations made in accordance with Section 722.111 for at least three years from the date that the waste was last sent to on-site or off-site treatment, storage or disposal facility. You are in apparent violation of this Section in that no records for the waste determination by process knowledge of the coker unifier spent catalyst sludge have not been maintained by this facility.

6. Pursuant to 35 Ill. Adm. Code 725.115(a), the owner or operator shall inspect the facility for malfunctions and deterioration, operator errors and discharges which may be causing -- or may lead to -- the conditions listed below. The owner or operator shall conduct these inspections often enough to identify problems in time to correct them before they harm human health or the environment.

    1. Release of hazardous waste constituents to the environment or

    2. A threat to human health.

You are in apparent violation of 35 Ill. Adm. Code 725.115(a) for the following reason: Failure to conduct inspections at the Guard Basin.

7. Pursuant to 35 Ill. Adm. Code 725.115 (b):

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

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

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

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

You are in apparent violation of 35 Ill. Adm. Code 725.115(b) for the following reason: Failure to conduct inspections at the Guard Basin.

8. Pursuant to 35 Ill. Adm. Code 725.116(a), facility personnel must complete a program of classroom instruction or on-the-job training directed by a person trained in hazardous waste management procedures. The training must be designed to ensure that facility personnel are able to respond to emergencies, and at a minimum meet the applicable requirements of Section 725.116(a)(3). You are in apparent violation of 35 Ill. Adm. Code 725.116(a) for the following reasons: RCRA training does not include the employee's function at Tank 4, the drum storage pad and the Guard Basin. Also, since there are deficiencies in the hazardous waste Contingency Plan, employees need to be trained on the corrected Plan.

9. Pursuant to 35 Ill. Adm. Code 725.152(b), if the owner or operator has already prepared a Spill Prevention, Control and Countermeasures (SPCC) Plan in accordance with 40 CFR Part 112 or 1510 or some other emergency or contingency plan, he need only amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Section. You are in apparent violation of 35 Ill. Adm. Code 725.152(b) for the following reasons: The areas of hazardous waste management, i.e., Tank 4, the drum pad and Guard Basin, must be included in the Contingency Plan. Also, the Plan did not include what actions facility personnel must take in case of a release from these areas.

10. Pursuant to 35 Ill. Adm. Code 725.173:

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

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

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

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

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

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

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

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

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

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

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

You are in apparent violation of 35 Ill. Adm. Code 725.173 for the following reason: Failure to have an operating record for the Guard Basin.

11. Pursuant to 35 Ill. Adm. Code 725.323, all earthen dikes must have a protective cover, such as grass, shale or rock to minimize wind and water erosion and to preserve their structural integrity. You are in apparent violation of this Section in that Clark failed to provide adequate cover for the earthen dikes of the Guard Basin.

12. Pursuant to 35 Ill. Adm. Code 725.326, the owner or operator must inspect:

    a. The freeboard level at least once each operating day to ensure compliance with Section 725.322; and

    b. 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.

You are in apparent violation of 35 Ill. Adm. Code 725.326 for the following reason: Failure to conduct inspections of the Guard Basin.

13. Pursuant to 35 Ill. Adm. Code 728.107(a)(5), if a generator determines whether the waste is restricted based solely on the generator's knowledge of the waste, the generator shall retain all supporting data used to make this determination on-site in the generator's files. If a generator determines whether the waste is restricted based on testing the waste or an extract developed using the test method described in Appendix A, the generator shall retain all waste analysis data on site in the generator's files.

You are in apparent violation of 35 Ill. Adm. Code 728.107(a)(5) for the following reason: Failure to retain supporting data on process knowledge used for the waste determination of the coker unifier spent sludge.

14. Pursuant to 35 Ill. Adm. Code 728.107(a)(7), generators shall retain on-site a copy of all notices, certifications, demonstrations, waste analysis data and other documentation produced pursuant to this Section for at least five years from the date that the waste that is the subject of such documentation was last sent to on-site or off-site treatment, storage or disposal. The five year record retention period is automatically extended during the course of any unresolved enforcement action regarding the regulated activity or as requested by the Agency.

You are in apparent violation of 35 Ill. Adm. Code 728.107(a)(7) for the following reason: Failure to communicate a copy of a Land Disposal Restriction Notification form for manifest #IL5231860.

CNC:cas/1033L

DATE: June 30, 1993

TIME: 9:30 - 3:15

I.D. 1190500002

Madison County

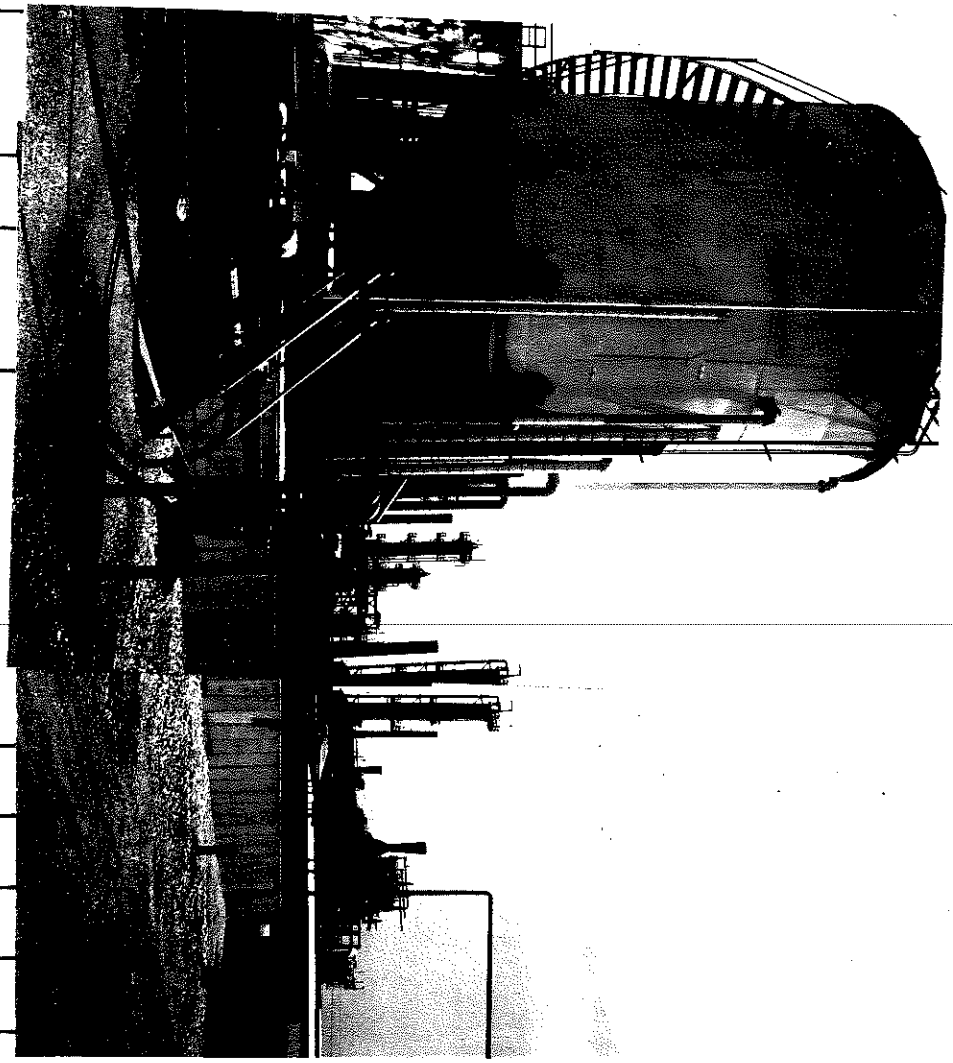
Clark Oil and Refining

PHOTOGRAPH TAKEN TOWARD THE:

Southwest

ROLL# 2146 PHOTO# 1

PHOTOGRAPH BY:



DATE: June 30, 1993

TIME: 9:30 - 3:15

I.D. 1190500002

Madison County

Clark Oil and Refining

PHOTOGRAPH TAKEN TOWARD THE:

Southwest

ROLL 2146 PHOTO# 2

PHOTOGRAPH BY:

DATE: June 30, 1993

TIME: 9:30 - 3:15

I.D. 1190500002

Madison County

Clark Oil and Refining

PHOTOGRAPH TAKEN TOWARD THE:

North

ROLL# 2146 PHOTO# 3

PHOTOGRAPH BY:

DATE: June 30, 1993

TIME: 9:30 - 3:15

I.D. 1190500002

Madison County

Clark Oil and Refining

PHOTOGRAPH TAKEN TOWARD THE:

South

ROLL# 2146 PHOTO# 4

PHOTOGRAPH BY:

DATE: June 30, 1993

TIME: 9:30 - 3:15

I.D. 1190500002

Madison County

Clark Oil and Refining

PHOTOGRAPH TAKEN TOWARD THE:

Northwest

ROLL# 2146 PHOTO# 5

PHOTOGRAPH BY:

DATE: June 30, 1993

TIME: 9:30 - 3:15

I.D. 1190500002

Madison County

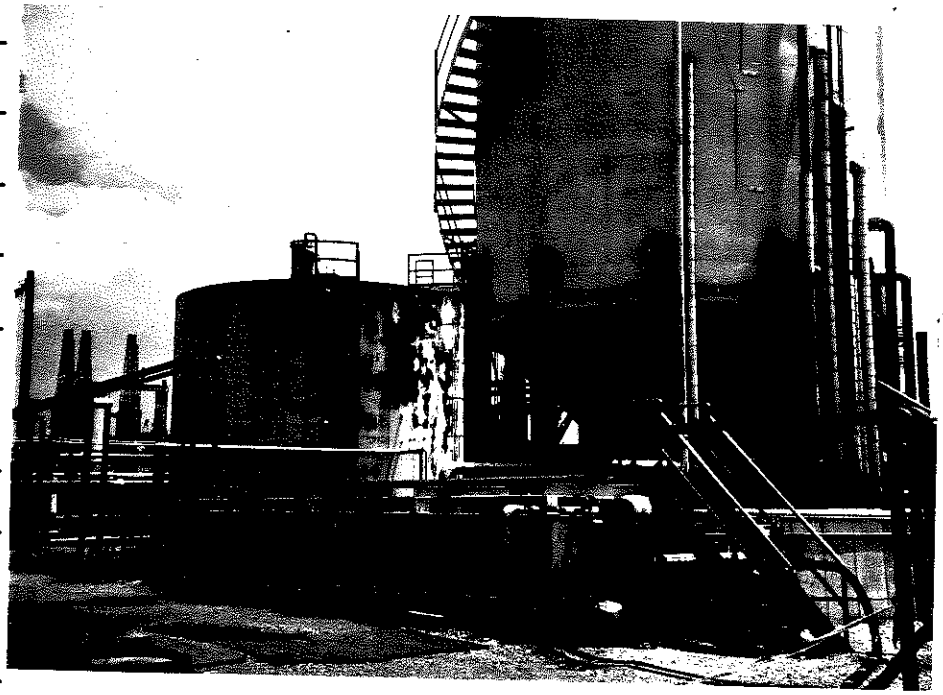
Clark Oil and Refining

PHOTOGRAPH TAKEN TOWARD THE:

Southeast

ROLL# 2146 PHOTO# 6

PHOTOGRAPH BY:



DATE: June 30, 1993

TIME: 9:30 - 3:15

I.D. 1190500002

Madison County

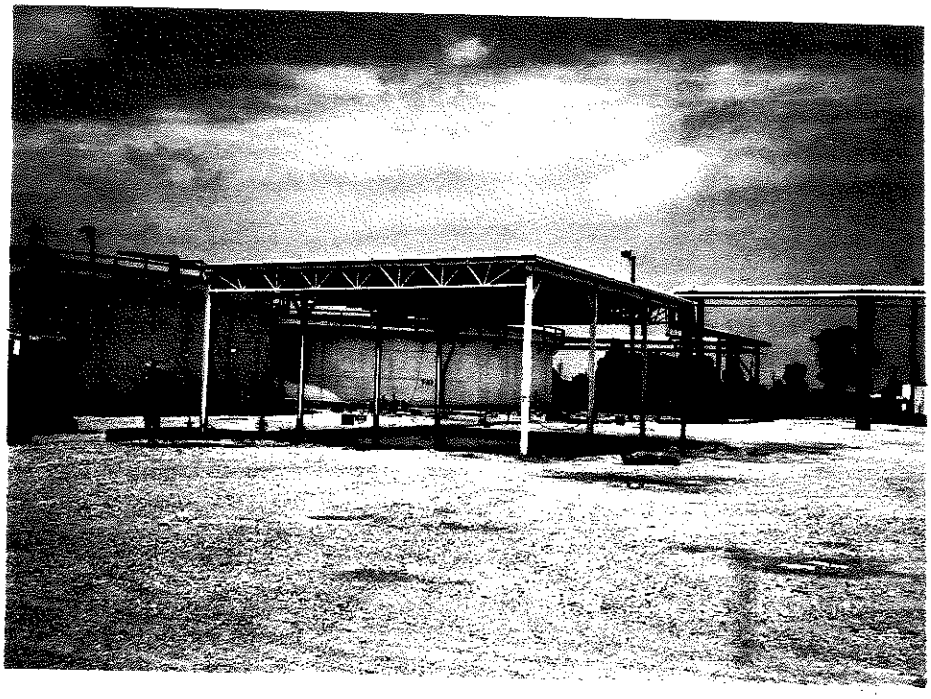
Clark Oil and Refining

PHOTOGRAPH TAKEN TOWARD THE:

Northwest

ROLL# 2146 PHOTO# 7

PHOTOGRAPH BY:



DATE: June 30, 1993

TIME: 9:30 - 3:15

I.D. 1190500002

Madison County

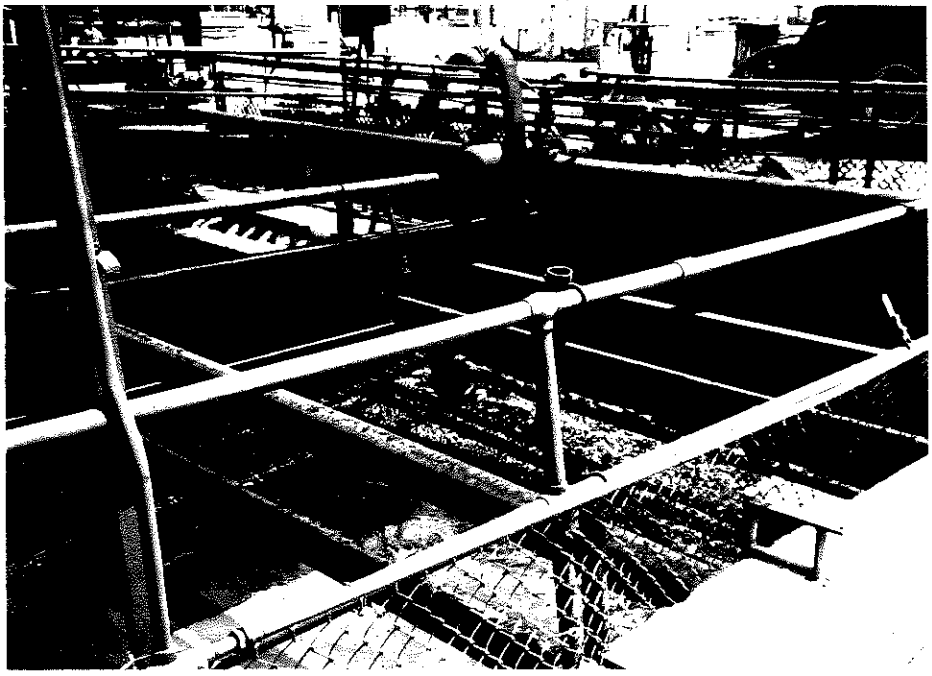
Clark Oil and Refining

PHOTOGRAPH TAKEN TOWARD THE:

Southeast

ROLL# 2146 PHOTO# 8

PHOTOGRAPH BY:



DATE: June 30, 1993

TIME: 9:30 - 3:15

I.D. 1190500002

Madison County

Clark Oil and Refining

PHOTOGRAPH TAKEN TOWARD THE:

East

ROLL# 2146 PHOTO# 9

PHOTOGRAPH BY:

DATE: June 30, 1993

TIME: 9:30 - 3:15

I.D. 1190500002

Madison County

Clark Oil and Refining

PHOTOGRAPH TAKEN TOWARD THE:

East

ROLL 2146 PHOTO# 10

PHOTOGRAPH BY:

DATE: June 30, 1993

TIME: 9:30 - 3:15

I.D. 1190500002

Madison County

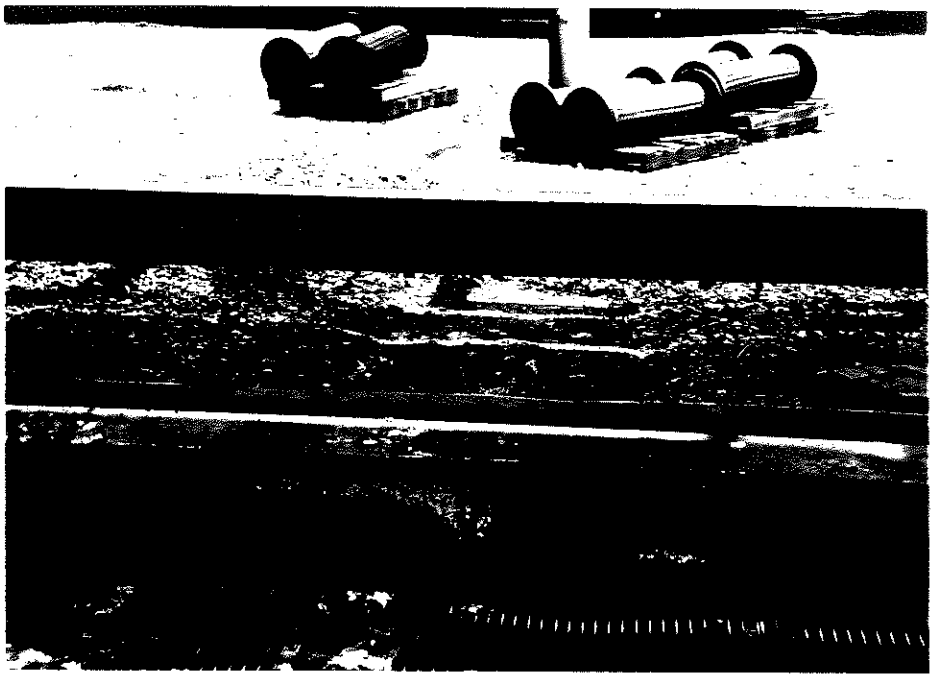
Clark Oil and Refining

PHOTOGRAPH TAKEN TOWARD THE:

South

ROLL# 2146 PHOTO# 11

PHOTOGRAPH BY:



DATE: June 30, 1993

TIME: 9:30 - 3:15

I.D. 1190500002

Madison County

Clark Oil and Refining

PHOTOGRAPH TAKEN TOWARD THE:

South

ROLL# 2146 PHOTO# 12

PHOTOGRAPH BY:

DATE: June 30, 1993

TIME: 9:30 - 3:15

I.D. 1190500002

Madison County

Clark Oil and Refining

PHOTOGRAPH TAKEN TOWARD THE:

Southeast

ROLL# 2145 PHOTO# 1

PHOTOGRAPH BY:

DATE: June 30, 1993

TIME: 9:30 - 3:15

I.D. 1190500002

Madison County

Clark Oil and Refining

PHOTOGRAPH TAKEN TOWARD THE:

Southeast

ROLL# 2145 PHOTO# 2

PHOTOGRAPH BY:

DATE: June 30, 1993

TIME: 9:30 - 3:15

I.D. 1190500002

Madison County

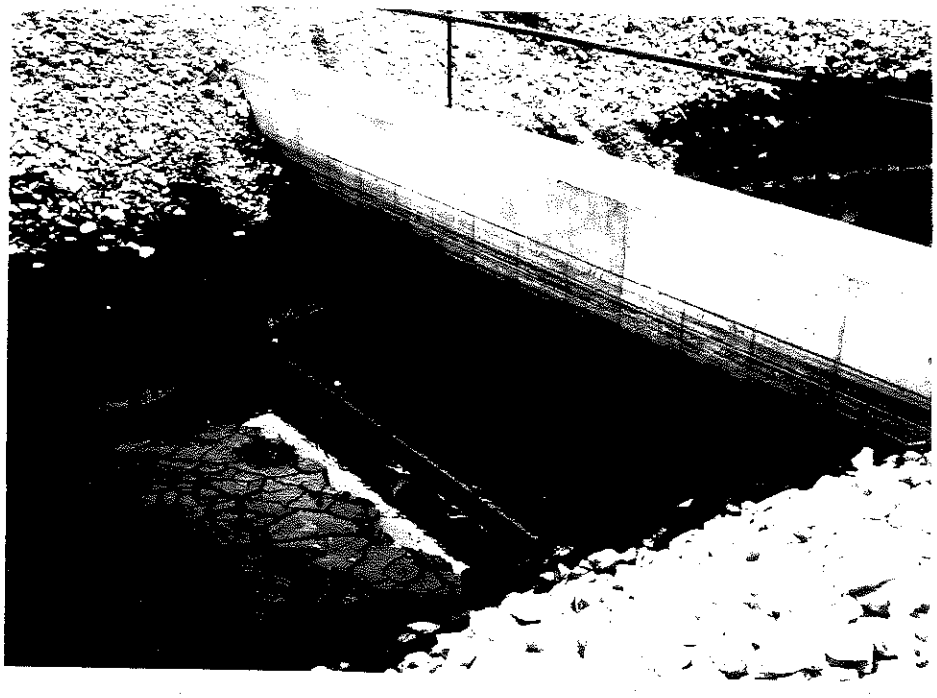
Clark Oil and Refining

PHOTOGRAPH TAKEN TOWARD THE:

Northeast

ROLL# 2145 PHOTO# 3

PHOTOGRAPH BY:



DATE: June 30, 1993

TIME: 9:30 - 3:15

I.D. 1190500002

Madison County

Clark Oil and Refining

PHOTOGRAPH TAKEN TOWARD THE:

Northwest

ROLL# 2145 PHOTO# 4

PHOTOGRAPH BY:

DATE: June 30, 1993

TIME: 9:30 - 3:15

I.D. 1190500002

Madison County

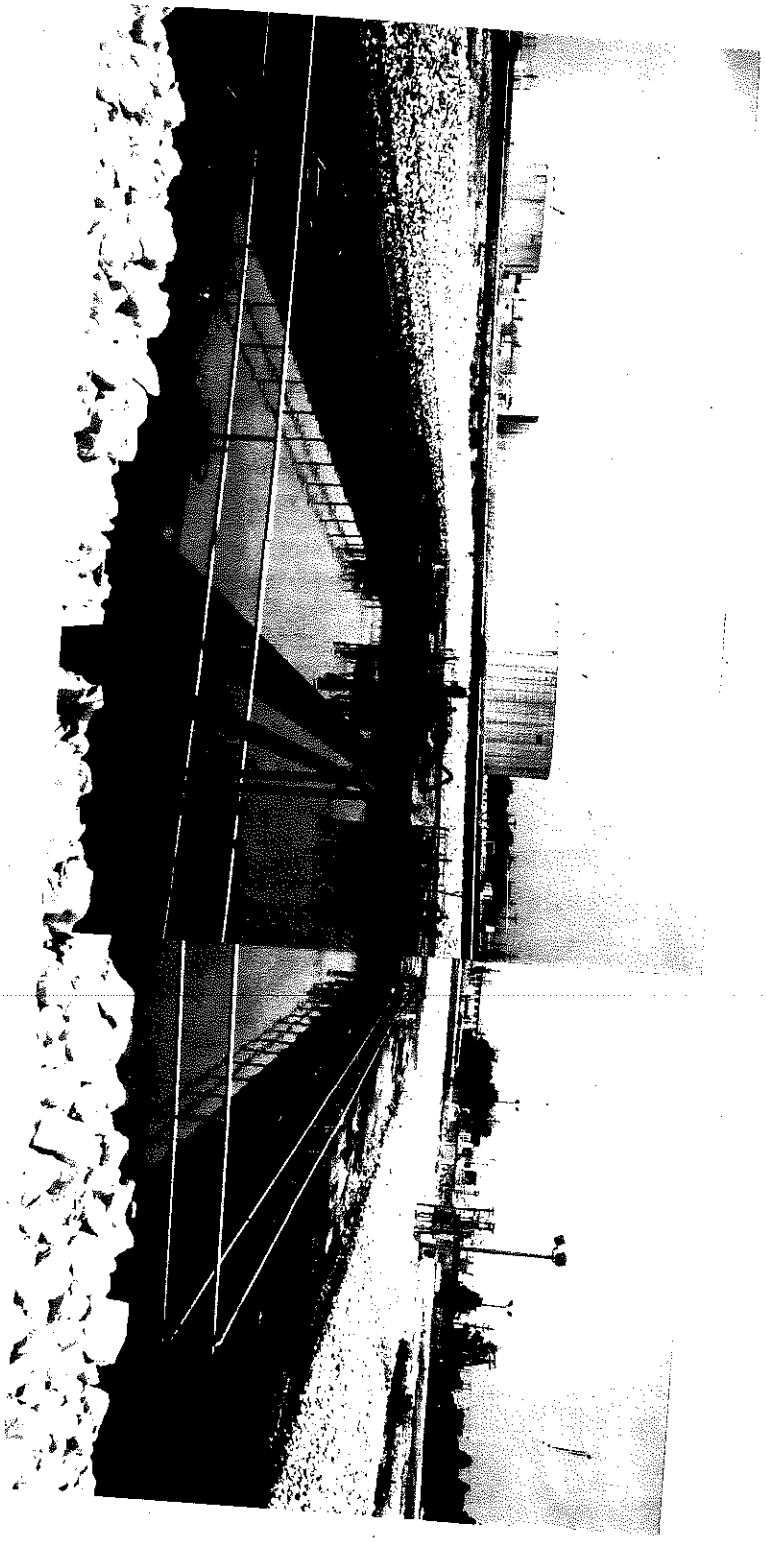
Clark Oil and Refining

PHOTOGRAPH TAKEN TOWARD THE:

North

ROLL# 2145 PHOTO# 5

PHOTOGRAPH BY:



DATE: June 30, 1993

TIME: 9:30 - 3:15

I.D. 1190500002

Madison County

Clark Oil and Refining

PHOTOGRAPH TAKEN TOWARD THE:

North

ROLL 2145 PHOTO# 6

PHOTOGRAPH BY:

DATE: June 30, 1993

TIME: 9:30 - 3:15

I.D. 1190500002

Madison County

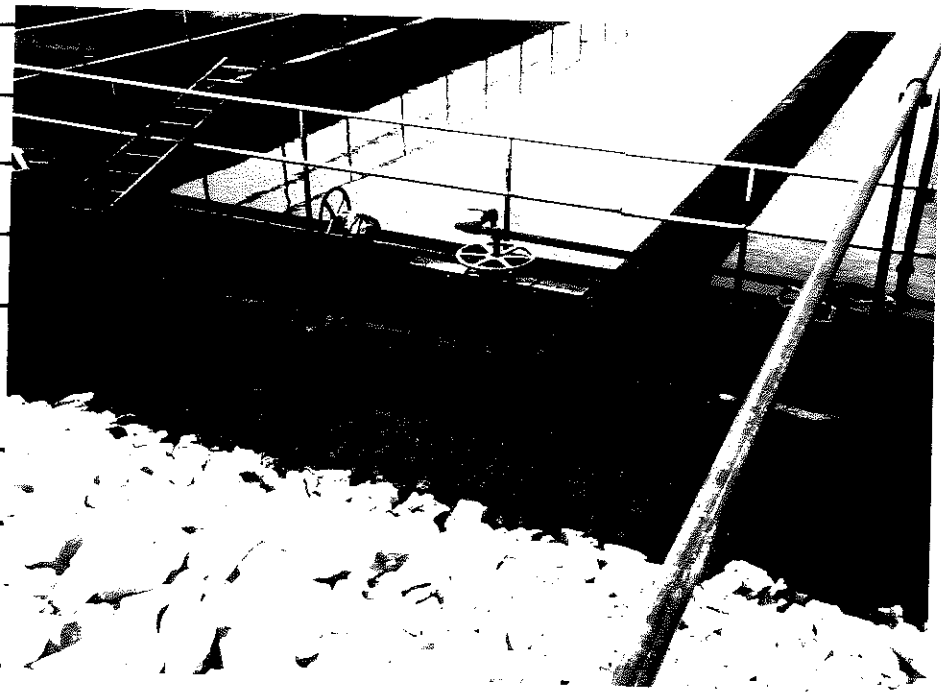
Clark Oil and Refining

PHOTOGRAPH TAKEN TOWARD THE:

Northwest

ROLL# 2145 PHOTO# 7

PHOTOGRAPH BY:



TE: June 30, 1993

ME: 9:30 - 3:15

I.D. 1190500002

Madison County

Clark Oil and Refining

PHOTOGRAPH TAKEN TOWARD THE:

East

ROLL 2145 PHOTO# 8

PHOTOGRAPH BY:

| | | | | | | |
|---|---|---|---|---|---|---|
| 1655 | 5/18/95 | ANTIFREEZE | COMPRESSOR | | | |
| 1656 | 5/20/95 | NONYL POLYSULFIDE | REFORMER | | | |
| 1657 | 5/20/95 | NEUTRALIZED ACID/SODA ASH | ALKY | | | |
| 1658 | 5/20/95 | SPENT LIME | ALKY | | | |
| 1659 | 5/20/95 | SPENT LIME | ALKY | | | |
| 1660 | 5/20/95 | SPENT LIME | ALKY | | | |
| 1661 | 5/21/95 | GAS FILTER | REFORMER | | | |
| 1662 | 5/21/95 | GAS FILTER | REFORMER | | | |
| 1663 | 5/21/95 | GAS FILTER | REFORMER | | | |
| 1664 | 5/21/95 | GAS FILTER | REFORMER | | | |
| 1665 | 5/21/95 | GAS FILTER | REFORMER | | | |
| 1666 | 5/21/95 | GAS FILTER | REFORMER | | | |
| 1667 | 5/21/95 | GAS FILTER | REFORMER | | | |
| 1668 | 5/22/95 | Bundle Sludge | Reformer | | | |
| 1669 | | | | | | |
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| 1672 | | | | | | |
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|---|---|---|---|---|---|---|
| 1604 | 3/15/95 | M E K | MAINTENANCE | TWI | IL6267563 | 3/27/95 |
| 1605 | 3/16/95 | HEAT EXCHANGE SLUDGE | DHDS | | | |
| 1606 | 3/23/95 | FILTERS | REFORMER | TWI | IL6267563 | 3/27/95 |
| 1607 | 3/23/95 | FILTERS | REFORMER | TWI | IL6267563 | 3/27/95 |
| 1608 | 3/23/95 | FILTERS | REFORMER | TWI | IL6267563 | 3/27/95 |
| 1609 | 3/23/95 | FILTERS | REFORMER | TWI | IL6267563 | 3/27/95 |
| 1610 | 3/29/95 | FILTERS | REFORMER | | | |
| 1611 | 3/29/95 | FILTERS | REFORMER | | | |
| 1612 | 3/29/95 | CONTAM ROCK | #4 AGITATOR | | | |
| 1613 | 3/29/95 | CONTAM ROCK | #4 AGITATOR | | | |
| 1614 | 3/31/95 | HEAT EXCHANGE SLUDGE | BUNDLE PAD | | | |
| 1615 | 3/31/95 | HEAT EXCHANGE SLUDGE | BUNDLE PAD | | | |
| 1616 | 3/31/95 | HEAT EXCHANGE SLUDGE | BUNDLE PAD | | | |
| 1617 | 3/31/95 | HEAT EXCHANGE SLUDGE | BUNDLE PAD | | | |
| 1618 | 3/31/95 | HEAT EXCHANGE SLUDGE | BUNDLE PAD | | | |
| 1619 | 3/31/95 | HEAT EXCHANGE SLUDGE | BUNDLE PAD | | | |
| 1620 | 3/31/95 | HEAT EXCHANGE SLUDGE | BUNDLE PAD | | | |
| 1621 | 3/31/95 | HEAT EXCHANGE SLUDGE | BUNDLE PAD | | | |
| 1622 | 3/31/95 | HEAT EXCHANGE SLUDGE | BUNDLE PAD | | | |
| 1623 | 3/30/95 | GAS | COKER | CLARK | 20241 | 3/29/95 |
| 1624 | 3/30/95 | ALCOHOL | FLUID | | | |
| 1625 | 3/30/95 | ANTI-FREEZE | MAINTENANCE | | | |
| 1626 | 3/30/95 | USED CAT | TIP | | | |
| 1627 | 4/20/95 | BUNDLE SLUDGE | BUNDLE PAD | | | |
| 1628 | 4/11/95 | BUNDLE SLUDGE | BUNDLE PAD | | | |
| 1629 | 4/10/95 | BUNDLE SLUDGE | BUNDLE PAD | | | |
| 1630 | 4/12/95 | BUNDLE SLUDGE | BUNDLE PAD | | | |
| 1631 | 4/20/95 | BUNDLE SLUDGE | BUNDLE PAD | | | |
| 1632 | 4/14/95 | BUNDLE SLUDGE | BUNDLE PAD | | | |
| 1633 | 4/14/95 | BUNDLE SLUDGE | BUNDLE PAD | | | |
| 1634 | 4/19/95 | BUNDLE SLUDGE | BUNDLE PAD | | | |
| 1635 | 4/12/95 | SPENT CAT | COKER | | | |
| 1636 | 4/12/95 | SPENT CAT | COKER | | | |
| 1637 | 4/12/95 | SPENT CAT | COKER | | | |
| 1638 | 4/12/95 | SPENT CAT | COKER | | | |
| 1639 | 4/12/95 | SPENT CAT | COKER | | | |
| 1640 | 4/12/95 | SPENT CAT | COKER | | | |
| 1641 | 4/12/95 | SPENT CAT | COKER | | | |
| 1642 | 4/12/95 | SPENT CAT | COKER | | | |
| 1643 | 4/12/95 | SPENT CAT | COKER | | | |
| 1644 | 4/12/95 | SPENT CAT | COKER | | | |
| 1645 | 4/10/95 | LEAD ACETATE | TIP | | | |
| 1646 | 4/10/95 | LEAD ACETATE | REFORMER | | | |
| 1647 | 4/10/95 | LEAD ACETATE | FLUIDS | | | |
| 1648 | 5/12/95 | BUNDLE SLUDGE | BUNDLE PAD | | | |
| 1649 | 5/12/95 | BUNDLE SLUDGE | BUNDLE PAD | | | |
| 1650 | 5/18/95 | FILTERS (COALESSER) | ALKY | | | |
| 1651 | 5/20/95 | BUNDLE SLUDGE | BUNDLE PAD | | | |
| 1652 | 5/20/95 | BUNDLE SLUDGE | BUNDLE PAD | | | |
| 1653 | 5/20/95 | BUNDLE SLUDGE | COKER | | | |
| 1654 | 5/18/95 | ANTIFREEZE | COMPRESSOR | | | |

CLARK HAZARDOUS
DRUM STORAGE
FACILITY

| DRUM # | DATE IN | CONTENTS BY VOLUME | CLARK JOB/ACCT NO | INHOUSE GENERATOR | WASTE DISPOSED | DRUM DISPOSED | DATE DISPOSED |
|---|---|---|---|---|---|---|---|
| 1559 | 2/7/95 | DIETHANOLAMINE | | ALKY UNIT | CLARK | 20241 | 4/4/95 |
| 1560 | 2/7/95 | DIETHANOLAMINE | | ALKY UNIT | CLARK | 20241 | 4/4/95 |
| 1561 | 2/7/95 | DIETHANOLAMINE | | ALKY UNIT | CLARK | 20241 | 4/4/95 |
| 1562 | 2/7/95 | DIETHANOLAMINE | | ALKY UNIT | CLARK | 20241 | 4/4/95 |
| 1563 | 2/7/95 | DIETHANOLAMINE | | ALKY UNIT | CLARK | 20241 | 4/4/95 |
| 1564 | 2/7/95 | DIETHANOLAMINE | | ALKY UNIT | CLARK | 20241 | 4/4/95 |
| 1565 | 2/7/95 | DIETHANOLAMINE | | ALKY UNIT | CLARK | 20241 | 4/4/95 |
| 1566 | 2/7/95 | DIETHANOLAMINE | | ALKY UNIT | CLARK | 20241 | 4/4/95 |
| 1567 | 2/7/95 | DIETHANOLAMINE | | ALKY UNIT | CLARK | 20241 | 4/4/95 |
| 1568 | 2/7/95 | DIETHANOLAMINE | | ALKY UNIT | CLARK | 20241 | 4/4/95 |
| 1569 | 2/28/95 | HDS FILTERS | | REFORMER | TWI | IL6267563 | 3/7/95 |
| 1570 | 2/28/95 | HDS FILTERS | | REFORMER | TWI | IL6267563 | 3/7/95 |
| 1571 | 2/28/95 | HDS FILTERS | | REFORMER | TWI | IL6267563 | 3/7/95 |
| 1572 | 2/28/95 | HDS FILTERS | | REFORMER | TWI | IL6267563 | 3/7/95 |
| 1573 | 2/28/95 | HDS FILTERS | | REFORMER | TWI | IL6267563 | 3/7/95 |
| 1574 | 2/28/95 | HDS FILTERS | | REFORMER | TWI | IL6267563 | 3/7/95 |
| 1575 | 2/28/95 | HDS FILTERS | | REFORMER | TWI | IL6267563 | 3/7/95 |
| 1576 | 2/28/95 | HDS FILTERS | | REFORMER | TWI | IL6267563 | 3/7/95 |
| 1577 | 2/28/95 | HDS FILTERS | | REFORMER | TWI | IL6267563 | 3/7/95 |
| 1578 | 2/28/95 | HDS FILTERS | | REFORMER | TWI | IL6267563 | 3/7/95 |
| 1579 | 2/28/95 | HDS FILTERS | | REFORMER | TWI | IL6267563 | 3/7/95 |
| 1580 | 2/28/95 | HDS FILTERS | | REFORMER | TWI | IL6267563 | 3/7/95 |
| 1581 | 2/28/95 | HDS FILTERS | | REFORMER | TWI | IL6267563 | 3/7/95 |
| 1582 | 2/28/95 | NEUTRALIZED ACID | | ALKY UNIT | 20214 | 20263 | 3/16/95 |
| 1583 | 2/28/95 | NEUTRALIZED ACID | | ALKY UNIT | 20214 | 20263 | 3/16/95 |
| 1584 | 2/28/95 | NEUTRALIZED ACID | | ALKY UNIT | 20214 | 20263 | 3/16/95 |
| 1585 | 2/28/95 | NEUTRALIZED ACID | | ALKY UNIT | 20214 | 20263 | 3/16/95 |
| 1586 | 2/28/95 | NEUTRALIZED ACID | | ALKY UNIT | 20214 | 20263 | 3/16/95 |
| 1587 | 2/28/95 | NEUTRALIZED ACID | | ALKY UNIT | 20214 | 20263 | 3/16/95 |
| 1588 | 2/9/95 | LIME | | BOILERHOUSE | 20214 | 20263 | 3/16/95 |
| 1589 | 2/9/95 | LIME | | BOILERHOUSE | 20214 | 20263 | 3/16/95 |
| 1590 | 2/13/95 | LIME | | BOILERHOUSE | 20214 | 20263 | 3/16/95 |
| 1591 | 2/13/95 | LIME | | BOILERHOUSE | 20214 | 20263 | 3/16/95 |
| 1592 | 2/13/95 | LIME | | BOILERHOUSE | 20214 | 20263 | 3/16/95 |
| 1593 | 2/13/95 | LIME | | BOILERHOUSE | 20214 | 20263 | 3/16/95 |
| 1594 | 2/13/95 | LIME | | BOILERHOUSE | 20214 | 20263 | 3/16/95 |
| 1595 | 2/13/95 | LIME | | BOILERHOUSE | 20214 | 20263 | 3/16/95 |
| 1596 | 3/14/95 | HDS FILTERS | | REFORMER | TWI | IL6267563 | 3/27/95 |
| 1597 | 3/14/95 | HDS FILTERS | | REFORMER | TWI | IL6267563 | 3/27/95 |
| 1598 | 3/14/95 | HDS FILTERS | | REFORMER | TWI | IL6267563 | 3/27/95 |
| 1599 | 3/14/95 | HDS FILTERS | | REFORMER | TWI | IL6267563 | 3/27/95 |
| 1600 | 3/14/95 | HDS FILTERS | | REFORMER | TWI | IL6267563 | 3/27/95 |
| 1601 | 3/14/95 | HDS FILTERS | | REFORMER | TWI | IL6267563 | 3/27/95 |
| 1602 | 3/14/95 | HDS FILTERS | | REFORMER | TWI | IL6267563 | 3/27/95 |
| 1603 | 3/14/95 | HDS FILTERS | | REFORMER | TWI | IL6267563 | 3/27/95 |

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|---|---|---|---|---|---|---|
| 1550 | 1/23/94 | DIETHANOLAMINE | ALKY UNIT | CLARK | 20241 | 4/4/95 |
| 1551 | 1/23/94 | DIETHANOLAMINE | ALKY UNIT | CLARK | 20241 | 4/4/95 |
| 1552 | 1/23/94 | DIETHANOLAMINE | ALKY UNIT | CLARK | 20241 | 4/4/95 |
| 1553 | 1/23/94 | DIETHANOLAMINE | ALKY UNIT | CLARK | 20241 | 4/4/95 |
| 1554 | 1/23/94 | DIETHANOLAMINE | ALKY UNIT | CLARK | 20241 | 4/4/95 |
| 1555 | 1/24/95 | BAD GAS | TERMINALS | CLARK | 20118 | 2/7/95 |
| 1556 | 1/24/95 | BAD GAS | TERMINALS | CLARK | 20118 | 2/7/95 |
| 1557 | 1/24/95 | BAD GAS | TERMINALS | CLARK | 20118 | 2/7/95 |
| 1558 | 1/24/95 | BAD GAS | TERMINALS | CLARK | 20118 | 2/7/95 |

| | | | | | | |
|---|---|---|---|---|---|---|
| 1499 | 1/10/95 | EMPTY DRUMS | BAD GAS | | 20118 | 3/9/95 |
| 1500 | 1/10/95 | EMPTY DRUMS | BAD GAS | | 20118 | 3/9/95 |
| 1501 | 1/10/95 | EMPTY DRUMS | BAD GAS | | 20118 | 3/9/95 |
| 1502 | 1/10/95 | EMPTY DRUMS | BAD GAS | | 20118 | 3/9/95 |
| 1503 | 1/10/95 | EMPTY DRUMS | BAD GAS | | 20118 | 3/9/95 |
| 1504 | 1/10/95 | EMPTY DRUMS | BAD GAS | | 20118 | 3/9/95 |
| 1505 | 1/10/95 | EMPTY DRUMS | BAD GAS | | 20118 | 3/9/95 |
| 1506 | 1/10/95 | EMPTY DRUMS | BAD GAS | | 20118 | 3/9/95 |
| 1507 | 1/10/95 | EMPTY DRUMS | BAD GAS | | 20118 | 3/9/95 |
| 1508 | 1/10/95 | EMPTY DRUMS | BAD GAS | | 20118 | 3/9/95 |
| 1509 | 1/10/95 | EMPTY DRUMS | BAD GAS | | 20118 | 3/9/95 |
| 1510 | 1/10/95 | EMPTY DRUMS | BAD GAS | | 20118 | 3/9/95 |
| 1511 | 1/10/95 | EMPTY DRUMS | BAD GAS | | 20118 | 3/9/95 |
| 1512 | 1/10/95 | EMPTY DRUMS | BAD GAS | | 20118 | 3/9/95 |
| 1513 | 1/10/95 | EMPTY DRUMS | BAD GAS | | 20118 | 3/9/95 |
| 1514 | 1/10/95 | EMPTY DRUMS | BAD GAS | | 20118 | 3/9/95 |
| 1515 | 1/10/95 | EMPTY DRUMS | BAD GAS | | 20118 | 3/9/95 |
| 1516 | 1/10/95 | EMPTY DRUMS | BAD GAS | | 20118 | 3/9/95 |
| 1517 | 1/10/95 | EMPTY DRUMS | BAD GAS | | 20118 | 3/9/95 |
| 1518 | 1/10/95 | EMPTY DRUMS | BAD GAS | | 20118 | 3/9/95 |
| 1519 | 1/10/95 | EMPTY DRUMS | BAD GAS | | 20118 | 3/9/95 |
| 1520 | 1/10/95 | EMPTY DRUMS | BAD GAS | | 20118 | 3/9/95 |
| 1521 | 1/10/95 | EMPTY DRUMS | BAD GAS | | 20118 | 3/9/95 |
| 1522 | 1/10/95 | EMPTY DRUMS | BAD GAS | | 20118 | 3/9/95 |
| 1523 | 1/10/95 | EMPTY DRUMS | BAD GAS | | 20118 | 3/9/95 |
| 1524 | 1/10/95 | EMPTY DRUMS | BAD GAS | | 20118 | 3/9/95 |
| 1525 | 1/10/95 | EMPTY DRUMS | BAD GAS | | 20118 | 3/9/95 |
| 1526 | 1/10/95 | EMPTY DRUMS | BAD GAS | | 20118 | 3/9/95 |
| 1527 | 1/10/95 | EMPTY DRUMS | BAD GAS | | 20118 | 3/9/95 |
| 1528 | 1/10/95 | EMPTY DRUMS | BAD GAS | | 20118 | 3/9/95 |
| 1529 | 1/10/95 | EMPTY DRUMS | BAD GAS | | 20118 | 3/9/95 |
| 1530 | 1/10/95 | EMPTY DRUMS | BAD GAS | | 20118 | 3/9/95 |
| 1531 | 1/10/95 | EMPTY DRUMS | BAD GAS | | 20118 | 3/9/95 |
| 1532 | 1/10/95 | EMPTY DRUMS | BAD GAS | | 20118 | 3/9/95 |
| 1533 | 1/10/95 | EMPTY DRUMS | BAD GAS | | 20118 | 3/9/95 |
| 1534 | 1/10/95 | EMPTY DRUMS | BAD GAS | | 20118 | 3/9/95 |
| 1535 | 1/10/95 | EMPTY DRUMS | BAD GAS | | 20118 | 3/9/95 |
| 1536 | 1/10/95 | EMPTY DRUMS | BAD GAS | | 20118 | 3/9/95 |
| 1537 | 1/10/95 | EMPTY DRUMS | BAD GAS | | 20118 | 3/9/95 |
| 1538 | 1/10/95 | EMPTY DRUMS | BAD GAS | | 20118 | 3/9/95 |
| 1539 | 1/10/95 | EMPTY DRUMS | BAD GAS | | 20118 | 3/9/95 |
| 1540 | 1/19/95 | TRICHLORLETHANE | REFORMER | CLARK | | 2/24/95 |
| 1541 | 1/19/95 | TRICHLORLETHANE | REFORMER | CLARK | | 2/24/95 |
| 1542 | 1/23/94 | DIETHANOLAMINE | ALKY UNIT | CLARK | 20241 | 4/4/95 |
| 1543 | 1/23/94 | DIETHANOLAMINE | ALKY UNIT | CLARK | 20241 | 4/4/95 |
| 1544 | 1/23/94 | DIETHANOLAMINE | ALKY UNIT | CLARK | 20241 | 4/4/95 |
| 1545 | 1/23/94 | DIETHANOLAMINE | ALKY UNIT | CLARK | 20241 | 4/4/95 |
| 1546 | 1/23/94 | DIETHANOLAMINE | ALKY UNIT | CLARK | 20241 | 4/4/95 |
| 1547 | 1/23/94 | DIETHANOLAMINE | ALKY UNIT | CLARK | 20241 | 4/4/95 |
| 1548 | 1/23/94 | DIETHANOLAMINE | ALKY UNIT | CLARK | 20241 | 4/4/95 |
| 1549 | 1/23/94 | DIETHANOLAMINE | ALKY UNIT | CLARK | 20241 | 4/4/95 |

| | | | | | | |
|---|---|---|---|---|---|---|
| 1448 | 12/29/94 | LEAD CONTAMINATED SOIL | RIVER TANK | TWI | IL6267563 | 3/27/95 |
| 1449 | 12/29/94 | FILTERS | REFORMER | TWI | IL6370564 | 12/29/94 |
| 1450 | 12/29/94 | FILTERS | REFORMER | TWI | IL6370564 | 12/29/94 |
| 1451 | 12/29/94 | FILTERS | REFORMER | TWI | IL6370564 | 12/29/94 |
| 1452 | 1/9/95 | ETHYL MERCAPTIN | BULLETS | TWI | IL6267563 | 3/27/95 |
| 1453 | 1/10/95 | EMPTY DRUMS | #4 COOLING TOWER | | 20118 | 3/9/95 |
| 1454 | 1/10/95 | EMPTY DRUMS | #4 COOLING TOWER | | 20118 | 3/9/95 |
| 1455 | 1/10/95 | EMPTY DRUMS | #4 COOLING TOWER | | 20118 | 3/9/95 |
| 1456 | 1/10/95 | EMPTY DRUMS | #4 COOLING TOWER | | 20118 | 3/9/95 |
| 1457 | 1/10/95 | EMPTY DRUMS | FLUID UNIT | | 20118 | 3/9/95 |
| 1458 | 1/10/95 | EMPTY DRUMS | FLUID UNIT | | 20118 | 3/9/95 |
| 1459 | 1/10/95 | EMPTY DRUMS | FLUID UNIT | | 20118 | 3/9/95 |
| 1460 | 1/10/95 | EMPTY DRUMS | FLUID UNIT | | 20118 | 3/9/95 |
| 1461 | 1/10/95 | EMPTY DRUMS | FLUID UNIT | | 20118 | 3/9/95 |
| 1462 | 1/10/95 | EMPTY DRUMS | FLUID UNIT | | 20118 | 3/9/95 |
| 1463 | 1/10/95 | EMPTY DRUMS | DHDS UNIT | | 20118 | 3/9/95 |
| 1464 | 1/10/95 | EMPTY DRUMS | DHDS UNIT | | 20118 | 3/9/95 |
| 1465 | 1/10/95 | EMPTY DRUMS | DHDS UNIT | | 20118 | 3/9/95 |
| 1466 | 1/10/95 | EMPTY DRUMS | DHDS UNIT | | 20118 | 3/9/95 |
| 1467 | 1/10/95 | EMPTY DRUMS | DHDS UNIT | | 20118 | 3/9/95 |
| 1468 | 1/10/95 | EMPTY DRUMS | BOILERHOUSE | | 20118 | 3/9/95 |
| 1469 | 1/10/95 | EMPTY DRUMS | BOILERHOUSE | | 20118 | 3/9/95 |
| 1470 | 1/10/95 | EMPTY DRUMS | BOILERHOUSE | | 20118 | 3/9/95 |
| 1471 | 1/10/95 | EMPTY DRUMS | BOILERHOUSE | | 20118 | 3/9/95 |
| 1472 | 1/10/95 | EMPTY DRUMS | BOILERHOUSE | | 20118 | 3/9/95 |
| 1473 | 1/10/95 | EMPTY DRUMS | BOILERHOUSE | | 20118 | 3/9/95 |
| 1474 | 1/10/95 | EMPTY DRUMS | BOILERHOUSE | | 20118 | 3/9/95 |
| 1475 | 1/10/95 | EMPTY DRUMS | BOILERHOUSE | | 20118 | 3/9/95 |
| 1476 | 1/10/95 | EMPTY DRUMS | BOILERHOUSE | | 20118 | 3/9/95 |
| 1477 | 1/10/95 | EMPTY DRUMS | BOILERHOUSE | | 20118 | 3/9/95 |
| 1478 | 1/10/95 | EMPTY DRUMS | BOILERHOUSE | | 20118 | 3/9/95 |
| 1479 | 1/10/95 | EMPTY DRUMS | BOILERHOUSE | | 20118 | 3/9/95 |
| 1480 | 1/10/95 | EMPTY DRUMS | BOILERHOUSE | | 20118 | 3/9/95 |
| 1481 | 1/10/95 | EMPTY DRUMS | BOILERHOUSE | | 20118 | 3/9/95 |
| 1482 | 1/10/95 | EMPTY DRUMS | BOILERHOUSE | | 20118 | 3/9/95 |
| 1483 | 1/10/95 | EMPTY DRUMS | BOILERHOUSE | | 20118 | 3/9/95 |
| 1484 | 1/10/95 | EMPTY DRUMS | BOILERHOUSE | | 20118 | 3/9/95 |
| 1485 | 1/10/95 | EMPTY DRUMS | BOILERHOUSE | | 20118 | 3/9/95 |
| 1486 | 1/10/95 | EMPTY DRUMS | BOILERHOUSE | | 20118 | 3/9/95 |
| 1487 | 1/10/95 | EMPTY DRUMS | LAB | | 20118 | 3/9/95 |
| 1488 | 1/10/95 | EMPTY DRUMS | LAB | | 20118 | 3/9/95 |
| 1489 | 1/10/95 | EMPTY DRUMS | BAD GAS | | 20118 | 3/9/95 |
| 1490 | 1/10/95 | EMPTY DRUMS | BAD GAS | | 20118 | 3/9/95 |
| 1491 | 1/10/95 | EMPTY DRUMS | BAD GAS | | 20118 | 3/9/95 |
| 1492 | 1/10/95 | EMPTY DRUMS | BAD GAS | | 20118 | 3/9/95 |
| 1493 | 1/10/95 | EMPTY DRUMS | BAD GAS | | 20118 | 3/9/95 |
| 1494 | 1/10/95 | EMPTY DRUMS | BAD GAS | | 20118 | 3/9/95 |
| 1495 | 1/10/95 | EMPTY DRUMS | BAD GAS | | 20118 | 3/9/95 |
| 1496 | 1/10/95 | EMPTY DRUMS | BAD GAS | | 20118 | 3/9/95 |
| 1497 | 1/10/95 | EMPTY DRUMS | BAD GAS | | 20118 | 3/9/95 |
| 1498 | 1/10/95 | EMPTY DRUMS | BAD GAS | | 20118 | 3/9/95 |

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|---|---|---|---|---|---|---|---|
| 1346 | 6/21/94 | IPC4445 | | STORES | STORES | 20125 | 6/23/94 |
| 1347 | 6/21/94 | IPC4445 | | STORES | STORES | 20125 | 6/23/94 |
| 1348 | 6/21/94 | IPC4445 | | STORES | STORES | 20125 | 6/23/94 |
| 1349 | 6/21/94 | IPC4445 | | STORES | STORES | 20125 | 6/23/94 |
| 1350 | 6/21/94 | M E K | | SCHUETZ | TWI | IL6256099 | 9/9/94 |
| 1351 | 6/28/94 | IPC4445 | | STORES | STORES | 20125 | 6/23/94 |
| 1352 | 6/28/94 | IPC4445 | | STORES | STORES | 20125 | 6/23/94 |
| 1353 | 6/29/94 | FILTERS | | REFORMER | TWI | IL6256017 | 7/15/94 |
| 1354 | 6/29/94 | FILTERS | | REFORMER | TWI | IL6256017 | 7/15/94 |
| 1355 | 6/29/94 | FILTERS | | REFORMER | TWI | IL6256017 | 7/15/94 |
| 1356 | 6/29/94 | FILTERS | | REFORMER | TWI | IL6256017 | 7/15/94 |
| 1357 | 7/1/94 | SPENT LIME | | B HOUSE | 20259 | 20125 | 7/6/94 |
| 1358 | 7/1/94 | SPENT LIME | | B HOUSE | 20259 | 20125 | 7/6/94 |
| 1359 | 7/1/94 | SPENT LIME | | B HOUSE | 20259 | 20125 | 7/6/94 |
| 1360 | 7/1/94 | SPENT LIME | | B HOUSE | 20259 | 20125 | 7/6/94 |
| 1361 | 7/30/94 | SPENT LIME | | B HOUSE | 2069 | B HOUSE | 8/11/94 |
| 1362 | 7/30/94 | SPENT LIME | | B HOUSE | 2069 | B HOUSE | 8/11/94 |
| 1363 | 7/30/94 | SPENT LIME | | B HOUSE | 2069 | B HOUSE | 8/11/94 |
| 1364 | 7/30/94 | SPENT LIME | | B HOUSE | 2069 | B HOUSE | 8/11/94 |
| 1365 | 8/10/94 | OILY SOIL | | MAINTENANCE | 20208 | 2069 | 9/8/94 |
| 1366 | 8/16/94 | FILTERS | | REFORMER | TWI | IL6256098 | 9/9/94 |
| 1367 | 8/16/94 | FILTERS | | REFORMER | TWI | IL6256098 | 9/9/94 |
| 1368 | 8/16/94 | FILTERS | | REFORMER | TWI | IL6256098 | 9/9/94 |
| 1369 | 8/16/94 | FILTERS | | REFORMER | TWI | IL6256098 | 9/9/94 |
| 1370 | 8/16/94 | FILTERS | | REFORMER | TWI | IL6256098 | 9/9/94 |
| 1371 | 8/22/94 | FILTERS | | REFORMER | TWI | IL6256098 | 9/9/94 |
| 1372 | 8/22/94 | FILTERS | | REFORMER | TWI | IL6256098 | 9/9/94 |
| 1373 | 8/22/94 | FILTERS | | REFORMER | TWI | IL6256098 | 9/9/94 |
| 1374 | 8/23/94 | SPENT CAT | NON-HAZ | REFORMER | 20196 | 20241 | 4/3/95 |
| 1375 | 8/23/94 | SPENT CAT | NON-HAZ | REFORMER | 20196 | 20241 | 4/3/95 |
| 1376 | 9/7/94 | OIL & ANTI- | FREEZE | MAINTENANCE | WISCON | WIJ531396 | 12/17/94 |
| 1377 | 9/7/94 | LIME | | B HOUSE | 20240 | B HOUSE | 10/24/94 |
| 1378 | 9/7/94 | LIME | | B HOUSE | 20240 | B HOUSE | 10/24/94 |
| 1379 | 9/7/94 | LIME | | B HOUSE | 20240 | B HOUSE | 10/24/94 |
| 1380 | 9/7/94 | LIME | | B HOUSE | 20240 | B HOUSE | 10/24/94 |
| 1381 | 9/7/94 | LIME | | B HOUSE | 20240 | B HOUSE | 10/24/94 |
| 1382 | 9/7/94 | LIME | | B HOUSE | 20240 | B HOUSE | 10/24/94 |
| 1383 | 9/7/94 | LIME | | B HOUSE | 20240 | B HOUSE | 10/24/94 |
| 1384 | 8/29/94 | FILTERS | | REFORMER | TWI | IL6256098 | 9/9/94 |
| 1385 | 8/29/94 | FILTERS | | REFORMER | TWI | IL6256098 | 9/9/94 |
| 1386 | 8/29/94 | FILTERS | | REFORMER | TWI | IL6256098 | 9/9/94 |
| 1387 | 8/29/94 | FILTERS | | REFORMER | TWI | IL6256098 | 9/9/94 |
| 1388 | 10/14/94 | FILTERS | | REFORMER | TWI | IL6256909 | 11/4/94 |
| 1389 | 10/14/94 | FILTERS | | REFORMER | TWI | IL6256909 | 11/4/94 |
| 1390 | 10/14/94 | FILTERS | | REFORMER | TWI | IL6256909 | 11/4/94 |
| 1391 | 10/14/94 | FILTERS | | REFORMER | TWI | IL6256909 | 11/4/94 |
| 1392 | 10/14/94 | FILTERS | | REFORMER | TWI | IL6256909 | 11/4/94 |
| 1393 | 10/14/94 | FILTERS | | REFORMER | TWI | IL6256909 | 11/4/94 |
| 1394 | 10/14/94 | FILTERS | | REFORMER | TWI | IL6256909 | 11/4/94 |
| 1395 | 10/14/94 | FILTERS | | REFORMER | TWI | IL6256909 | 11/4/94 |
| 1396 | 10/14/94 | FILTERS | | REFORMER | TWI | IL6256909 | 11/4/94 |
| 1397 | 10/14/94 | FILTERS | | REFORMER | TWI | IL6256909 | 11/4/94 |

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|---|---|---|---|---|---|---|---|
| 1397 | 10/14/94 | FILTERS | | REFORMER | TWI | IL6256909 | 11/4/94 |
| 1398 | 10/14/94 | FILTERS | | REFORMER | TWI | IL6256909 | 11/4/94 |
| 1399 | 10/14/94 | FILTERS | | REFORMER | TWI | IL6256909 | 11/4/94 |
| 1400 | 10/14/94 | FILTERS | | REFORMER | TWI | IL6256909 | 11/4/94 |
| 1401 | 10/14/94 | FILTERS | | REFORMER | TWI | IL6256909 | 11/4/94 |
| 1402 | 10/14/94 | FILTERS | | REFORMER | TWI | IL6256909 | 11/4/94 |
| 1403 | 10/14/94 | FILTERS | | REFORMER | TWI | IL6256909 | 11/4/94 |
| 1404 | 10/14/94 | FILTERS | | REFORMER | TWI | IL6256909 | 11/4/94 |
| 1405 | 10/14/94 | FILTERS | | REFORMER | TWI | IL6256909 | 11/4/94 |
| 1406 | 10/14/94 | FILTERS | | REFORMER | TWI | IL6256909 | 11/4/94 |
| 1407 | 10/14/94 | FILTERS | | REFORMER | TWI | IL6256909 | 11/4/94 |
| 1408 | 10/14/94 | FILTERS | | REFORMER | TWI | IL6256909 | 11/4/94 |
| 1409 | 10/14/94 | FILTERS | | REFORMER | TWI | IL6256909 | 11/4/94 |
| 1410 | 10/14/94 | FILTERS | | REFORMER | TWI | IL6256909 | 11/4/94 |
| 1411 | 11/23/94 | LIME | | B HOUSE | 2055 | B HOUSE | 11/28/94 |
| 1412 | 11/23/94 | LIME | | B HOUSE | 2055 | B HOUSE | 11/28/94 |
| 1413 | 11/23/94 | LIME | | B HOUSE | 2055 | B HOUSE | 11/28/94 |
| 1414 | 11/23/94 | LIME | | B HOUSE | 2055 | B HOUSE | 11/28/94 |
| 1415 | 11/23/94 | LIME | | B HOUSE | 2055 | B HOUSE | 11/28/94 |
| 1416 | 11/23/94 | LIME | | B HOUSE | 2055 | B HOUSE | 11/28/94 |
| 1417 | 11/23/94 | LIME | | B HOUSE | 2055 | B HOUSE | 11/28/94 |
| 1418 | 11/23/94 | COAL & SAND | | BIO | 2055 | B HOUSE | 11/28/94 |
| 1419 | 12/16/94 | FILTERS | | REFORMER | TWI | IL6370564 | 12/29/94 |
| 1420 | 12/16/94 | FILTERS | | REFORMER | TWI | IL6370564 | 12/29/94 |
| 1421 | 12/16/94 | FILTERS | | REFORMER | TWI | IL6370564 | 12/29/94 |
| 1422 | 12/16/94 | FILTERS | | REFORMER | TWI | IL6370564 | 12/29/94 |
| 1423 | 12/16/94 | FILTERS | | REFORMER | TWI | IL6370564 | 12/29/94 |
| 1424 | 12/16/94 | FILTERS | | REFORMER | TWI | IL6370564 | 12/29/94 |
| 1425 | 12/16/94 | FILTERS | | REFORMER | TWI | IL6370564 | 12/29/94 |
| 1426 | 12/16/94 | FILTERS | | REFORMER | TWI | IL6370564 | 12/29/94 |
| 1427 | 12/16/94 | FILTERS | | REFORMER | TWI | IL6370564 | 12/29/94 |
| 1428 | 12/16/94 | FILTERS | | REFORMER | TWI | IL6370564 | 12/29/94 |
| 1429 | 12/16/94 | FILTERS | | REFORMER | TWI | IL6370564 | 12/29/94 |
| 1430 | 12/16/94 | FILTERS | | REFORMER | TWI | IL6370564 | 12/29/94 |
| 1431 | 12/16/94 | FILTERS | | REFORMER | TWI | IL6370564 | 12/29/94 |
| 1432 | 12/16/94 | FILTERS | | REFORMER | TWI | IL6370564 | 12/29/94 |
| 1433 | 12/16/94 | FILTERS | | REFORMER | TWI | IL6370564 | 12/29/94 |
| 1434 | 12/16/94 | FILTERS | | REFORMER | TWI | IL6370564 | 12/29/94 |
| 1435 | 12/16/94 | FILTERS | | REFORMER | TWI | IL6370564 | 12/29/94 |
| 1436 | 12/16/94 | FILTERS | | REFORMER | TWI | IL6370564 | 12/29/94 |
| 1437 | 12/16/94 | FILTERS | | REFORMER | TWI | IL6370564 | 12/29/94 |
| 1438 | 12/23/94 | LIME | | BOILERHOUSE | 2036 | RECLAIM | 12/23/94 |
| 1439 | 12/23/94 | LIME | | BOILERHOUSE | 2036 | RECLAIM | 12/23/94 |
| 1440 | 12/23/94 | LIME | | BOILERHOUSE | 2036 | RECLAIM | 12/23/94 |
| 1441 | 12/23/94 | LIME | | BOILERHOUSE | 2036 | RECLAIM | 12/23/94 |
| 1442 | 12/23/94 | LIME | | BOILERHOUSE | 2036 | RECLAIM | 12/23/94 |
| 1443 | 12/23/94 | LIME | | BOILERHOUSE | 2036 | RECLAIM | 12/23/94 |
| 1444 | 12/23/94 | LIME | | BOILERHOUSE | 2036 | RECLAIM | 12/23/94 |
| 1445 | 12/23/94 | CAUSTIC & H2O | | BOILERHOUSE | 2036 | RECLAIM | 12/23/94 |
| 1446 | 12/23/94 | CLEANUP | | ALKY UNIT | 2036 | RECLAIM | 12/23/94 |
| 1447 | 12/23/94 | CLEANUP | | BOILERHOUSE | 2036 | RECLAIM | 12/23/94 |

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|---|---|---|---|---|---|---|---|
| 1296 | 4/29/94 | SPENT CAT | NON–HAZ | REFORMER | 20166 | 20125 | 5/24/94 |
| 1297 | 4/29/94 | SPENT CAT | NON–HAZ | REFORMER | 20166 | 20125 | 5/24/94 |
| 1298 | 4/29/94 | SPENT CAT | NON–HAZ | REFORMER | 20166 | 20125 | 5/24/94 |
| 1299 | 5/4/94 | TRANSFORMER OIL | | CRUDE UNIT | CLARK | 20125 | 6/24/94 |
| 1300 | 5/4/94 | TRANSFORMER OIL | | CRUDE UNIT | CLARK | 20125 | 6/24/94 |
| 1301 | 5/13/94 | SPENT CAT | | COKER | RECYCLED | LA3137678 | 5/11/94 |
| 1302 | 5/13/94 | SPENT CAT | | COKER | RECYCLED | LA3137678 | 5/11/94 |
| 1303 | 5/13/94 | SPENT CAT | | COKER | RECYCLED | LA3137678 | 5/11/94 |
| 1304 | 5/13/94 | CERAMIC BALLS | | STORES | 20166 | 20125 | 5/20/94 |
| 1305 | 5/13/94 | SPENT CAT | NON–HAZ | FLUID | 20196 | 20241 | 4/3/95 |
| 1306 | 5/13/94 | SPENT CAT | NON–HAZ | FLUID | 20196 | 20241 | 4/3/95 |
| 1307 | 5/13/94 | SPENT CAT | NON–HAZ | FLUID | COMBINED | WITH 1311 | 8/11/94 |
| 1308 | 5/13/94 | SPENT CAT | NON–HAZ | FLUID | 20196 | 20241 | 4/3/95 |
| 1309 | 5/13/94 | SPENT CAT | NON–HAZ | FLUID | 20196 | 20241 | 4/3/95 |
| 1310 | 5/13/94 | SPENT CAT | NON–HAZ | FLUID | 20196 | 20241 | 4/3/95 |
| 1311 | 5/13/94 | SPENT CAT | NON–HAZ | FLUID | 20196 | 20241 | 4/3/95 |
| 1312 | 5/13/94 | SPENT CAT | | COKER | RECYCLED | LA3137678 | 5/11/94 |
| 1313 | 5/13/94 | SPENT CAT | | COKER | RECYCLED | LA3137678 | 5/11/94 |
| 1314 | 5/16/94 | CERAMIC BALLS | | STORES | 20166 | 20125 | 5/20/94 |
| 1315 | 5/16/94 | CERAMIC BALLS | | STORES | 20166 | 20125 | 5/20/94 |
| 1316 | 5/16/94 | CERAMIC BALLS | | STORES | 20166 | 20125 | 5/20/94 |
| 1317 | 5/17/94 | M T DRUM | | LAB | | 20125 | 5/20/94 |
| 1318 | 5/17/94 | M T DRUM | | LAB | | 20125 | 5/20/94 |
| 1319 | 5/17/94 | M T DRUM | | LAB | | 20125 | 5/20/94 |
| 1320 | 5/17/94 | M T DRUM | | LAB | | 20125 | 5/20/94 |
| 1321 | 5/17/94 | M T DRUM | | LAB | | 20125 | 5/20/94 |
| 1322 | 5/20/94 | MOLE. SIEVE | NON–HAZ | WAREHOUSE | 20166 | 20125 | 5/20/94 |
| 1323 | 5/20/94 | MOLE. SIEVE | NON–HAZ | WAREHOUSE | 20166 | 20125 | 5/20/94 |
| 1324 | 5/20/94 | TRASH | NON–HAZ | WAREHOUSE | S. DEBRIS | 20125 | 5/20/94 |
| 1325 | 5/20/94 | OIL | NON–HAZ | WAREHOUSE | BIO | 20125 | 5/20/94 |
| 1326 | 5/20/94 | MOLE. SIEVE | NON–HAZ | WAREHOUSE | 20166 | 20125 | 5/20/94 |
| 1327 | 5/21/94 | TAR PITCH | | RIVER | 20174 | 20125 | 5/21/94 |
| 1328 | 6/2/94 | FILTERS | | REFORMER | TWI | IL6256017 | 7/15/94 |
| 1329 | 6/2/94 | FILTERS | | REFORMER | TWI | IL6256017 | 7/15/94 |
| 1330 | 6/2/94 | FILTERS | | REFORMER | TWI | IL6256017 | 7/15/94 |
| 1331 | 6/2/94 | FILTERS | | REFORMER | TWI | IL6256017 | 7/15/94 |
| 1332 | 6/14/94 | TRANSFORMER OIL | | PUMP HOUSE | BIO | 20125 | 8/3/94 |
| 1333 | 6/14/94 | TRANSFORMER OIL | | PUMP HOUSE | BIO | 20125 | 8/3/94 |
| 1334 | 6/14/94 | TRANSFORMER OIL | | PUMP HOUSE | BIO | 20125 | 8/3/94 |
| 1335 | 6/14/94 | TRANSFORMER OIL | | PUMP HOUSE | BIO | 20125 | 8/3/94 |
| 1336 | 6/14/94 | FILTERS | | REFORMER | TWI | IL6256017 | 7/15/94 |
| 1337 | 6/14/94 | FILTERS | | REFORMER | TWI | IL6256017 | 7/15/94 |
| 1338 | 6/14/94 | FILTERS | | REFORMER | TWI | IL6256017 | 7/15/94 |
| 1339 | 6/14/94 | RYDLYME | | WAREHOUSE | CLARK | RECLAIM | 8/16/94 |
| 1340 | 6/14/94 | RYDLYME | | WAREHOUSE | CLARK | RECLAIM | 9/7/94 |
| 1341 | 6/16/94 | PETROLITE 1100 | | STORES | CLARK | | 5/19/95 |
| 1342 | 6/16/94 | PETROLITE 1100 | | STORES | CLARK | | 5/19/95 |
| 1343 | 6/16/94 | PETROLITE 1100 | | STORES | CLARK | | 5/19/95 |
| 1344 | 6/16/94 | ~~UNKNOWN PURE PRODUCT~~ OIL 30W | | STORES | CLARK | | 4/25/95 |
| 1345 | 6/16/94 | OIL | | STORES | CLARK | 20125 | 6/27/94 |

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|---|---|---|---|---|---|---|---|
| 1244 | 5/3/94 | EMPTY | | BOILERHOUSE | | 20125 | 5/3/94 |
| 1245 | 5/3/94 | EMPTY | | BOILERHOUSE | | 20125 | 5/3/94 |
| 1246 | 5/3/94 | EMPTY | | BOILERHOUSE | | 20125 | 5/3/94 |
| 1247 | 5/3/94 | EMPTY | | BOILERHOUSE | | 20125 | 5/3/94 |
| 1248 | 5/3/94 | EMPTY | | BOILERHOUSE | | 20125 | 5/3/94 |
| 1249 | 5/3/94 | EMPTY | | BOILERHOUSE | | 20125 | 5/3/94 |
| 1250 | 5/3/94 | EMPTY | | BOILERHOUSE | | 20125 | 5/3/94 |
| 1251 | 5/3/94 | EMPTY | | BOILERHOUSE | | 20125 | 5/3/94 |
| 1252 | 5/3/94 | EMPTY | | BOILERHOUSE | | 20125 | 5/3/94 |
| 1253 | 5/3/94 | EMPTY | | BOILERHOUSE | | 20125 | 5/3/94 |
| 1254 | 5/3/94 | EMPTY | | BOILERHOUSE | | 20125 | 5/3/94 |
| 1255 | 5/3/94 | EMPTY | | BOILERHOUSE | | 20125 | 5/3/94 |
| 1256 | 5/3/94 | EMPTY | | BOILERHOUSE | | 20125 | 5/3/94 |
| 1257 | 4/29/94 | SPENT CAT | | COKER | RECYCLED | LA3137678 | 5/11/94 |
| 1258 | 4/29/94 | SPENT CAT | | COKER | RECYCLED | LA3137678 | 5/11/94 |
| 1259 | 4/29/94 | SPENT CAT | | COKER | RECYCLED | LA3137678 | 5/11/94 |
| 1260 | 4/29/94 | SPENT CAT | | COKER | RECYCLED | LA3137678 | 5/11/94 |
| 1261 | 4/29/94 | SPENT CAT | | COKER | RECYCLED | LA3137678 | 5/11/94 |
| 1262 | 4/29/94 | SPENT CAT | | COKER | RECYCLED | LA3137678 | 5/11/94 |
| 1263 | 4/29/94 | SPENT CAT | | COKER | RECYCLED | LA3137678 | 5/11/94 |
| 1264 | 4/29/94 | SPENT CAT | | COKER | RECYCLED | LA3137678 | 5/11/94 |
| 1265 | 4/29/94 | SPENT CAT | | COKER | RECYCLED | LA3137678 | 5/11/94 |
| 1266 | 4/29/94 | SPENT CAT | | COKER | RECYCLED | LA3137678 | 5/11/94 |
| 1267 | 4/29/94 | SPENT CAT | | COKER | RECYCLED | LA3137678 | 5/11/94 |
| 1268 | 4/29/94 | SPENT CAT | | COKER | RECYCLED | LA3137678 | 5/11/94 |
| 1269 | 4/29/94 | SPENT CAT | | COKER | RECYCLED | LA3137678 | 5/11/94 |
| 1270 | 4/29/94 | SPENT CAT | | COKER | RECYCLED | LA3137678 | 5/11/94 |
| 1271 | 4/29/94 | SPENT CAT | | COKER | RECYCLED | LA3137678 | 5/11/94 |
| 1272 | 4/29/94 | SPENT CAT | | COKER | RECYCLED | LA3137678 | 5/11/94 |
| 1273 | 4/29/94 | SPENT CAT | | COKER | RECYCLED | LA3137678 | 5/11/94 |
| 1274 | 4/29/94 | SPENT CAT | | COKER | RECYCLED | LA3137678 | 5/11/94 |
| 1275 | 4/29/94 | SPENT CAT | | COKER | RECYCLED | LA3137678 | 5/11/94 |
| 1276 | 4/29/94 | SPENT CAT | | COKER | RECYCLED | LA3137678 | 5/11/94 |
| 1277 | 4/29/94 | SPENT CAT | | COKER | RECYCLED | LA3137678 | 5/11/94 |
| 1278 | 4/29/94 | SPENT CAT | | COKER | RECYCLED | LA3137678 | 5/11/94 |
| 1279 | 4/29/94 | SPENT CAT | | COKER | RECYCLED | LA3137678 | 5/11/94 |
| 1280 | 4/29/94 | SPENT CAT | | COKER | RECYCLED | LA3137678 | 5/11/94 |
| 1281 | 4/29/94 | SPENT CAT | | COKER | RECYCLED | LA3137678 | 5/11/94 |
| 1282 | 4/29/94 | SPENT CAT | | COKER | RECYCLED | LA3137678 | 5/11/94 |
| 1283 | 4/29/94 | SPENT CAT | | COKER | RECYCLED | LA3137678 | 5/11/94 |
| 1284 | 4/29/94 | SPENT CAT | | COKER | RECYCLED | LA3137678 | 5/11/94 |
| 1285 | 4/29/94 | SPENT CAT | | COKER | RECYCLED | LA3137678 | 5/11/94 |
| 1286 | 4/29/94 | SPENT CAT | | COKER | RECYCLED | LA3137678 | 5/11/94 |
| 1287 | 4/29/94 | SPENT CAT | | COKER | RECYCLED | LA3137678 | 5/11/94 |
| 1288 | 4/29/94 | SPENT CAT | | COKER | RECYCLED | LA3137678 | 5/11/94 |
| 1289 | 4/29/94 | SPENT CAT | | COKER | RECYCLED | LA3137678 | 5/11/94 |
| 1290 | 4/29/94 | SPENT CAT | | COKER | RECYCLED | LA3137678 | 5/11/94 |
| 1291 | 4/29/94 | SPENT CAT | | COKER | RECYCLED | LA3137678 | 5/11/94 |
| 1292 | 4/29/94 | SPENT CAT | | COKER | RECYCLED | LA3137678 | 5/11/94 |
| 1293 | 4/29/94 | SPENT CAT | | COKER | RECYCLED | LA3137678 | 5/11/94 |
| 1294 | 4/29/94 | SPENT CAT | | COKER | RECYCLED | LA3137678 | 5/11/94 |
| 1295 | 4/29/94 | SPENT CAT | NON-HAZ | COKER | 20166 | 20125 | 5/24/94 |

| | | | | | | | |
|---|---|---|---|---|---|---|---|
| 1193 | 4/29/94 | MT OIL DRUMS | | MAINTENENCE | | 20125 | 4/29/94 |
| 1194 | 4/29/94 | MT OIL DRUMS | | MAINTENENCE | | 20125 | 4/29/94 |
| 1195 | 4/29/94 | MT OIL DRUMS | | MAINTENENCE | | 20125 | 4/29/94 |
| 1196 | 4/29/94 | MT OIL DRUMS | | MAINTENENCE | | 20125 | 4/29/94 |
| 1197 | 4/29/94 | MT OIL DRUMS | | MAINTENENCE | | 20125 | 4/29/94 |
| 1198 | 4/29/94 | MT OIL DRUMS | | MAINTENENCE | | 20125 | 4/29/94 |
| 1199 | 4/29/94 | MT OIL DRUMS | | MAINTENENCE | | 20125 | 4/29/94 |
| 1200 | 4/29/94 | MT OIL DRUMS | | MAINTENENCE | | 20125 | 4/29/94 |
| 1201 | 4/29/94 | MT OIL DRUMS | | MAINTENENCE | | 20125 | 4/29/94 |
| 1202 | 4/29/94 | MT OIL DRUMS | | MAINTENENCE | | 20125 | 4/29/94 |
| 1203 | 4/29/94 | MT OIL DRUMS | | MAINTENENCE | | 20125 | 4/29/94 |
| 1204 | 4/29/94 | MT OIL DRUMS | | MAINTENENCE | | 20125 | 4/29/94 |
| 1205 | 4/29/94 | MT OIL DRUMS | | MAINTENENCE | | 20125 | 4/29/94 |
| 1206 | 4/29/94 | MT OIL DRUMS | | MAINTENENCE | | 20125 | 4/29/94 |
| 1207 | 4/29/94 | MT OIL DRUMS | | MAINTENENCE | | 20125 | 4/29/94 |
| 1208 | 4/29/94 | MT OIL DRUMS | | MAINTENENCE | | 20125 | 4/29/94 |
| 1209 | 4/29/94 | MT OIL DRUMS | | MAINTENENCE | | 20125 | 4/29/94 |
| 1210 | 5/3/94 | FILTERS | | CAT CRACKER | TWI | IL6256017 | 7/15/94 |
| 1211 | 5/3/94 | FILTERS | | CAT CRACKER | TWI | IL6256017 | 7/15/94 |
| 1212 | 5/3/94 | FILTERS | | CAT CRACKER | TWI | IL6256017 | 7/15/94 |
| 1213 | 5/3/94 | FILTERS | | CAT CRACKER | TWI | IL6256017 | 7/15/94 |
| 1214 | 5/3/94 | ASPHALTIC TAR | | CRUDE UNIT | 20152 | 20125 | 5/5/94 |
| 1215 | 5/3/94 | ASPHALTIC TAR | | CRUDE UNIT | 20152 | 20125 | 5/5/94 |
| 1216 | 5/3/94 | ASPHALTIC TAR | | CRUDE UNIT | 20152 | 20125 | 5/5/94 |
| 1217 | 5/3/94 | ASPHALTIC TAR | | CRUDE UNIT | 20152 | 20125 | 5/5/94 |
| 1218 | 5/3/94 | ASPHALTIC TAR | | CRUDE UNIT | 20152 | 20125 | 5/5/94 |
| 1219 | 5/3/94 | ASPHALTIC TAR | | CRUDE UNIT | 20152 | 20125 | 5/5/94 |
| 1220 | 5/3/94 | ASPHALTIC TAR | | CRUDE UNIT | 20152 | 20125 | 5/5/94 |
| 1221 | 5/3/94 | ASPHALTIC TAR | | CRUDE UNIT | 20152 | 20125 | 5/5/94 |
| 1222 | 5/3/94 | ASPHALTIC TAR | | CRUDE UNIT | 20152 | 20125 | 5/5/94 |
| 1223 | 5/3/94 | ASPHALTIC TAR | | CRUDE UNIT | 20152 | 20125 | 5/5/94 |
| 1224 | 5/3/94 | ASPHALTIC TAR | | CRUDE UNIT | 20152 | 20125 | 5/5/94 |
| 1225 | 5/3/94 | ASPHALTIC TAR | | CRUDE UNIT | 20152 | 20125 | 5/5/94 |
| 1226 | 5/3/94 | EMPTY | | FLUID UNIT | | 20125 | 5/3/94 |
| 1227 | 5/3/94 | EMPTY | | FLUID UNIT | | 20125 | 5/3/94 |
| 1228 | 5/3/94 | EMPTY | | FLUID UNIT | | 20125 | 5/3/94 |
| 1229 | 5/3/94 | EMPTY | | FLUID UNIT | | 20125 | 5/3/94 |
| 1230 | 5/3/94 | EMPTY | | BOILERHOUSE | | 20125 | 5/3/94 |
| 1231 | 5/3/94 | EMPTY | | BOILERHOUSE | | 20125 | 5/3/94 |
| 1232 | 5/3/94 | EMPTY | | BOILERHOUSE | | 20125 | 5/3/94 |
| 1233 | 5/3/94 | EMPTY | | BOILERHOUSE | | 20125 | 5/3/94 |
| 1234 | 5/3/94 | EMPTY | | BOILERHOUSE | | 20125 | 5/3/94 |
| 1235 | 5/3/94 | EMPTY | | BOILERHOUSE | | 20125 | 5/3/94 |
| 1236 | 5/3/94 | EMPTY | | BOILERHOUSE | | 20125 | 5/3/94 |
| 1237 | 5/3/94 | EMPTY | | BOILERHOUSE | | 20125 | 5/3/94 |
| 1238 | 5/3/94 | EMPTY | | BOILERHOUSE | | 20125 | 5/3/94 |
| 1239 | 5/3/94 | EMPTY | | BOILERHOUSE | | 20125 | 5/3/94 |
| 1240 | 5/3/94 | EMPTY | | BOILERHOUSE | | 20125 | 5/3/94 |
| 1241 | 5/3/94 | EMPTY | | BOILERHOUSE | | 20125 | 5/3/94 |
| 1242 | 5/3/94 | EMPTY | | BOILERHOUSE | | 20125 | 5/3/94 |
| 1243 | 5/3/94 | EMPTY | | BOILERHOUSE | | 20125 | 5/3/94 |

| | | | | | | |
|---|---|---|---|---|---|---|
| 1142 | 12/9/94 | HEAT EXCHANGER SLUDGE | T-118 | TWI | | 3/9/94 |
| 1143 | 12/9/94 | HEAT EXCHANGER SLUDGE | T-118 | TWI | | 3/9/94 |
| 1144 | 12/9/94 | HEAT EXCHANGER SLUDGE | T-118 | TWI | | 3/9/94 |
| 1145 | 12/9/94 | HEAT EXCHANGER SLUDGE | T-118 | TWI | | 3/9/94 |
| 1146 | 12/9/94 | HEAT EXCHANGER SLUDGE | T-118 | TWI | | 3/9/94 |
| 1147 | 12/9/94 | HEAT EXCHANGER SLUDGE | T-118 | TWI | | 3/9/94 |
| 1148 | 12/9/94 | HEAT EXCHANGER SLUDGE | T-118 | TWI | | 3/9/94 |
| 1149 | 12/9/94 | HEAT EXCHANGER SLUDGE | T-118 | TWI | | 3/9/94 |
| 1150 | 12/9/94 | HEAT EXCHANGER SLUDGE | T-118 | TWI | | 3/9/94 |
| 1151 | 12/9/94 | HEAT EXCHANGER SLUDGE | T-118 | TWI | | 3/9/94 |
| 1152 | 12/9/94 | HEAT EXCHANGER SLUDGE | T-118 | TWI | | 3/9/94 |
| 1153 | 12/9/94 | HEAT EXCHANGER SLUDGE | T-118 | TWI | | 3/9/94 |
| 1154 | 12/9/94 | HEAT EXCHANGER SLUDGE | T-118 | TWI | | 3/9/94 |
| 1155 | 12/9/94 | HEAT EXCHANGER SLUDGE | T-118 | TWI | | 3/9/94 |
| 1156 | 12/9/94 | HEAT EXCHANGER SLUDGE | T-118 | TWI | | 3/9/94 |
| 1157 | 12/9/94 | HEAT EXCHANGER SLUDGE | T-118 | TWI | | 3/9/94 |
| 1158 | 12/9/94 | HEAT EXCHANGER SLUDGE | T-118 | TWI | | 3/9/94 |
| 1159 | 12/9/94 | HEAT EXCHANGER SLUDGE | T-118 | TWI | | 3/9/94 |
| 1160 | 12/9/94 | HEAT EXCHANGER SLUDGE | T-118 | TWI | | 3/9/94 |
| 1161 | 12/9/94 | HEAT EXCHANGER SLUDGE | T-118 | TWI | | 3/9/94 |
| 1162 | 12/9/94 | HEAT EXCHANGER SLUDGE | T-118 | TWI | | 3/9/94 |
| 1163 | 12/9/94 | HEAT EXCHANGER SLUDGE | T-118 | TWI | | 3/9/94 |
| 1164 | 12/9/94 | HEAT EXCHANGER SLUDGE | T-118 | TWI | | 3/9/94 |
| 1165 | 3/18/94 | FILTERS | REFORMER | TWI | IL4704915 | 4/1/94 |
| 1166 | 3/18/94 | FILTERS | REFORMER | TWI | IL4704915 | 4/1/94 |
| 1167 | 3/18/94 | FILTERS | REFORMER | TWI | IL4704915 | 4/1/94 |
| 1168 | 3/18/94 | FILTERS | REFORMER | TWI | IL4704915 | 4/1/94 |
| 1169 | 3/18/94 | FILTERS | REFORMER | TWI | IL4704915 | 4/1/94 |
| 1170 | 4/1/94 | ASPHALT TAR | RIVER C/U | 20100 | 20125 | 4/22/94 |
| 1171 | 4/21/94 | SOIL CUTTINGS | RIVER C/U | 20100 | 20125 | 4/22/94 |
| 1172 | 4/21/94 | SOIL CUTTINGS | RIVER C/U | 20100 | 20125 | 4/22/94 |
| 1173 | 4/22/94 | ASPHALT TAR | RIVER C/U | 2069 | 20125 | 4/22/94 |
| 1174 | 4/22/94 | ASPHALT TAR | RIVER C/U | 2069 | 20125 | 4/22/94 |
| 1175 | 4/22/94 | ASPHALT TAR | RIVER C/U | 2069 | 20125 | 4/22/94 |
| 1176 | 4/22/94 | ASPHALT TAR | RIVER C/U | 2069 | 20125 | 4/22/94 |
| 1177 | 4/22/94 | OILY SOIL | BIO | 2069 | 20125 | 4/22/94 |
| 1178 | 4/22/94 | OILY SOIL | BIO | 2069 | 20125 | 4/22/94 |
| 1179 | 4/22/94 | OILY SOIL | BIO | 2069 | 20125 | 4/22/94 |
| 1180 | 4/22/94 | OILY SOIL | BIO | 2069 | 20125 | 4/22/94 |
| 1181 | 4/25/94 | ZINC SULFIDE | TIPS UNIT | TWI | IL6256017 | 7/15/94 |
| 1182 | 4/25/94 | ZINC SULFIDE | TIPS UNIT | TWI | IL6256017 | 7/15/94 |
| 1183 | 4/25/94 | ZINC SULFIDE | TIPS UNIT | TWI | IL6256017 | 7/15/94 |
| 1184 | 4/25/94 | ZINC SULFIDE | TIPS UNIT | TWI | IL6256017 | 7/15/94 |
| 1185 | 4/25/94 | ZINC SULFIDE | TIPS UNIT | TWI | IL6256017 | 7/15/94 |
| 1186 | 4/25/94 | ZINC SULFIDE | TIPS UNIT | TWI | IL6256017 | 7/15/94 |
| 1187 | 4/25/94 | ZINC SULFIDE | TIPS UNIT | TWI | IL6256017 | 7/15/94 |
| 1188 | 4/25/94 | ZINC SULFIDE | TIPS UNIT | TWI | IL6256017 | 7/15/94 |
| 1189 | 4/29/94 | MT OIL DRUMS | MAINTENENCE | | 20125 | 4/29/94 |
| 1190 | 4/29/94 | MT OIL DRUMS | MAINTENENCE | | 20125 | 4/29/94 |
| 1191 | 4/29/94 | MT OIL DRUMS | MAINTENENCE | | 20125 | 4/29/94 |
| 1192 | 4/29/94 | MT OIL DRUMS | MAINTENENCE | | 20125 | 4/29/94 |

CLARK HAZARDOUS
DRUM STORAGE
FACILITY

| DRUM # | DATE IN | CONTENTS BY VOLUME | CLARK JOB/ACCT NO | INHOUSE GENERATOR | WASTE DISPOSED | DRUM DISPOSED | DATE DISPOSED |
|---|---|---|---|---|---|---|---|
| 1097 | 1/4/94 | CONT SOIL | | GUARD BASIN | 20152 | 20227 | 1/12/94 |
| 1098 | 1/4/94 | CONT SOIL | | GUARD BASIN | 20152 | 20227 | 1/12/94 |
| 1099 | 1/4/94 | CONT SOIL | | GUARD BASIN | 20152 | 20227 | 1/12/94 |
| 1100 | 1/4/94 | CONT SOIL | | GUARD BASIN | 20152 | 20227 | 1/12/94 |
| 1101 | 1/4/94 | CONT SOIL | | GUARD BASIN | 20152 | 20227 | 1/12/94 |
| 1102 | 1/4/94 | CONT SOIL | | GUARD BASIN | 20152 | 20227 | 1/12/94 |
| 1103 | 1/4/94 | CONT SOIL | | GUARD BASIN | 20152 | 20227 | 1/12/94 |
| 1104 | 1/4/94 | CONT SOIL | | GUARD BASIN | 20152 | 20227 | 1/12/94 |
| 1105 | 1/4/94 | CONT SOIL | | GUARD BASIN | 20152 | 20227 | 1/12/94 |
| 1106 | 1/4/94 | CONT SOIL | | GUARD BASIN | 20152 | 20227 | 1/12/94 |
| 1107 | 1/4/94 | CONT SOIL | | GUARD BASIN | 20152 | 20227 | 1/12/94 |
| 1108 | 1/4/94 | CONT SOIL | | GUARD BASIN | 20152 | 20227 | 1/12/94 |
| 1109 | 1/4/94 | CONT SOIL | | GUARD BASIN | 20152 | 20227 | 1/12/94 |
| 1110 | 1/4/94 | CONT SOIL | | GUARD BASIN | 20152 | 20227 | 1/12/94 |
| 1111 | 1/5/94 | FILTERS | | REFORMER | TWI | IL4704915 | 4/1/94 |
| 1112 | 1/5/94 | FILTERS | | REFORMER | TWI | IL4704915 | 4/1/94 |
| 1113 | 1/5/94 | FILTERS | | REFORMER | TWI | IL4704915 | 4/1/94 |
| 1114 | 1/5/94 | FILTERS | | REFORMER | TWI | IL4704915 | 4/1/94 |
| 1115 | 1/12/94 | SLUDGE | | BIO | 20249 | 20227 | 2/22/94 |
| 1116 | 1/12/94 | SLUDGE | | BIO | 20249 | 20227 | 2/22/94 |
| 1117 | 1/12/94 | SLUDGE | | BIO | 20249 | 20227 | 2/22/94 |
| 1118 | 1/12/94 | SLUDGE | | BIO | 20249 | 20227 | 2/22/94 |
| 1119 | 1/19/94 | OIL WASTE | | T-120-8 | CLARK | 20227 | 2/22/94 |
| 1120 | 1/19/94 | CHROMATE | | ALKY | CLARK | | 3/16/94 |
| 1121 | 1/19/94 | CHROMATE | | ALKY | CLARK | | 3/16/94 |
| 1122 | 1/26/94 | TAR PITCH | | CRUDE UNIT | 20152 | 20227 | 2/24/94 |
| 1123 | 1/26/94 | TAR PITCH | | CRUDE UNIT | 20152 | 20227 | 2/24/94 |
| 1124 | 1/26/94 | TAR PITCH | | CRUDE UNIT | 20152 | 20227 | 2/24/94 |
| 1125 | 1/26/94 | TAR PITCH | | CRUDE UNIT | 20152 | 20227 | 2/24/94 |
| 1126 | 2/15/94 | SOAP | | PLANT | M/W ENVIR | 2069 | 8/18/94 |
| 1127 | 2/15/94 | SOAP | | PLANT | M/W ENVIR | 2069 | 8/18/94 |
| 1128 | 2/15/94 | SOAP | | PLANT | M/W ENVIR | 2069 | 8/18/94 |
| 1129 | 2/15/94 | SOAP | | PLANT | M/W ENVIR | 2069 | 8/18/94 |
| 1130 | 2/15/94 | SOAP | | PLANT | M/W ENVIR | 2069 | 8/18/94 |
| 1131 | 2/15/94 | SOAP | | PLANT | M/W ENVIR | 2069 | 8/18/94 |
| 1132 | 2/15/94 | SOAP | | PLANT | | | |
| 1133 | 2/25/94 | TRICHLOROETHANE | | ELECTRIC | CLARK | 20125 | 5/8/94 |
| 1134 | 3/1/94 | LIME | | B HOUSE | 20118 | 20125 | 3/3/94 |
| 1135 | 3/1/94 | LIME | | B HOUSE | 20118 | 20125 | 3/3/94 |
| 1136 | 2/24/94 | SOLID UNKNOWN | | MAINTENANCE | TWI | IL6255610 | 4/22/94 |
| 1137 | 2/24/94 | LQUID UNKNOWN | | MAINTENANCE | TWI | IL6255610 | 4/22/94 |
| 1138 | 3/1/94 | LIME | | B HOUSE | 20118 | 20125 | 3/3/94 |
| 1139 | 3/1/94 | LIME | | B HOUSE | 20118 | 20125 | 3/3/94 |
| 1140 | 3/1/94 | ETHYL MERCAPTIN | | BULLETS | TWI | IL6255610 | 4/22/94 |
| 1141 | 12/29/94 | HEAT EXCHANGER SLUDGE | | T-1-18 | WISCON | | 3/9/94 |

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|---|---|---|---|---|---|---|---|
| 1071 | 12/30/93 | EMPTY | | NORTH PAD | | 20139 | 12/30/93 |
| 1072 | 12/30/93 | EMPTY | | NORTH PAD | | 20139 | 12/30/93 |
| 1073 | 12/30/93 | EMPTY | | NORTH PAD | | 20139 | 12/30/93 |
| 1074 | 12/30/93 | EMPTY | | NORTH PAD | | 20139 | 12/30/93 |
| 1075 | 12/30/93 | EMPTY | | NORTH PAD | | 20139 | 12/30/93 |
| 1076 | 12/30/93 | EMPTY | | NORTH PAD | | 20139 | 12/30/93 |
| 1077 | 12/30/93 | EMPTY | | NORTH PAD | | 20139 | 12/30/93 |
| 1078 | 12/30/93 | EMPTY | | NORTH PAD | | 20139 | 12/30/93 |
| 1079 | 12/30/93 | EMPTY | | NORTH PAD | | 20139 | 12/30/93 |
| 1080 | 12/30/93 | EMPTY | | NORTH PAD | | 20139 | 12/30/93 |
| 1081 | 12/30/93 | EMPTY | | NORTH PAD | | 20139 | 12/30/93 |
| 1082 | 12/30/93 | EMPTY | | NORTH PAD | | 20139 | 12/30/93 |
| 1083 | 12/30/93 | EMPTY | | NORTH PAD | | 20139 | 12/30/93 |
| 1084 | 12/30/93 | EMPTY | | NORTH PAD | | 20139 | 12/30/93 |
| 1085 | 12/30/93 | EMPTY | | NORTH PAD | | 20139 | 12/30/93 |
| 1086 | 12/30/93 | EMPTY | | NORTH PAD | | 20139 | 12/30/93 |
| 1087 | 12/30/93 | EMPTY | | NORTH PAD | | 20139 | 12/30/93 |
| 1088 | 12/30/93 | EMPTY | | NORTH PAD | | 20139 | 12/30/93 |
| 1089 | 12/30/93 | EMPTY | | NORTH PAD | | 20139 | 12/30/93 |
| 1090 | 12/30/93 | EMPTY | | RECEIVING | | 20139 | 12/30/93 |
| 1091 | 12/30/93 | HAZ P C/U | | HAZ PAD | 20152 | 20227 | 2/24/94 |
| 1092 | 12/30/93 | BALLS | | NORTH PAD | 2069 | RECLAIM | 1/13/94 |
| 1093 | 12/30/93 | BALLS | | NORTH PAD | 2069 | RECLAIM | 1/13/94 |
| 1094 | 12/30/93 | BALLS | | NORTH PAD | 2069 | RECLAIM | 1/13/94 |
| 1095 | 12/30/93 | BALLS | | NORTH PAD | 2069 | RECLAIM | 1/13/94 |
| 1096 | 12/30/93 | EPOXY | | RECEIVING | TWI | IL6255610 | 4/22/94 |

| | | | | | | | |
|---|---|---|---|---|---|---|---|
| 1020 | 12/30/93 | EMPTY | | NORTH PAD | | 20139 | 12/30/93 |
| 1021 | 12/30/93 | EMPTY | | NORTH PAD | | 20139 | 12/30/93 |
| 1022 | 12/30/93 | EMPTY | | NORTH PAD | | 20139 | 12/30/93 |
| 1023 | 12/30/93 | EMPTY | | NORTH PAD | | 20139 | 12/30/93 |
| 1024 | 12/30/93 | EMPTY | | NORTH PAD | | 20139 | 12/30/93 |
| 1025 | 12/30/93 | EMPTY | | NORTH PAD | | 20139 | 12/30/93 |
| 1026 | 12/30/93 | EMPTY | | NORTH PAD | | 20139 | 12/30/93 |
| 1027 | 12/30/93 | EMPTY | | NORTH PAD | | 20139 | 12/30/93 |
| 1028 | 12/30/93 | EMPTY | | NORTH PAD | | 20139 | 12/30/93 |
| 1029 | 12/30/93 | EMPTY | | NORTH PAD | | 20139 | 12/30/93 |
| 1030 | 12/30/93 | EMPTY | | NORTH PAD | | 20139 | 12/30/93 |
| 1031 | 12/30/93 | EMPTY | | NORTH PAD | | 20139 | 12/30/93 |
| 1032 | 12/30/93 | EMPTY | | NORTH PAD | | 20139 | 12/30/93 |
| 1033 | 12/30/93 | EMPTY | | NORTH PAD | | 20139 | 12/30/93 |
| 1034 | 12/30/93 | EMPTY | | NORTH PAD | | 20139 | 12/30/93 |
| 1035 | 12/30/93 | EMPTY | | NORTH PAD | | 20139 | 12/30/93 |
| 1036 | 12/30/93 | EMPTY | | NORTH PAD | | 20139 | 12/30/93 |
| 1037 | 12/30/93 | EMPTY | | NORTH PAD | | 20139 | 12/30/93 |
| 1038 | 12/30/93 | EMPTY | | NORTH PAD | | 20139 | 12/30/93 |
| 1039 | 12/30/93 | EMPTY | | NORTH PAD | | 20139 | 12/30/93 |
| 1040 | 12/30/93 | EMPTY | | NORTH PAD | | 20139 | 12/30/93 |
| 1041 | 12/30/93 | EMPTY | | NORTH PAD | | 20139 | 12/30/93 |
| 1042 | 12/30/93 | EMPTY | | NORTH PAD | | 20139 | 12/30/93 |
| 1043 | 12/30/93 | EMPTY | | NORTH PAD | | 20139 | 12/30/93 |
| 1044 | 12/30/93 | EMPTY | | NORTH PAD | | 20139 | 12/30/93 |
| 1045 | 12/30/93 | EMPTY | | NORTH PAD | | 20139 | 12/30/93 |
| 1046 | 12/30/93 | EMPTY | | NORTH PAD | | 20139 | 12/30/93 |
| 1047 | 12/30/93 | EMPTY | | NORTH PAD | | 20139 | 12/30/93 |
| 1048 | 12/30/93 | EMPTY | | NORTH PAD | | 20139 | 12/30/93 |
| 1049 | 12/30/93 | EMPTY | | NORTH PAD | | 20139 | 12/30/93 |
| 1050 | 12/30/93 | EMPTY | | NORTH PAD | | 20139 | 12/30/93 |
| 1051 | 12/30/93 | EMPTY | | NORTH PAD | | 20139 | 12/30/93 |
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| 1070 | 12/30/93 | EMPTY | | NORTH PAD | | 20139 | 12/30/93 |

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| 970 | 12/29/93 | EMPTY | | NORTH PAD | | 20246 | 12/29/93 |
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| 977 | 12/29/93 | EMPTY | | NORTH PAD | | 20246 | 12/29/93 |
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| 994 | 12/29/93 | EMPTY | | NORTH PAD | | 20246 | 12/29/93 |
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| 999 | 12/29/93 | EMPTY | | NORTH PAD | | 20246 | 12/29/93 |
| 1000 | 12/29/93 | EMPTY | | NORTH PAD | | 20246 | 12/29/93 |
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| 1018 | 12/30/93 | EMPTY | | NORTH PAD | | 20139 | 12/30/93 |
| 1019 | 12/30/93 | EMPTY | | NORTH PAD | | 20139 | 12/30/93 |

CLARK HAZARDOUS
DRUM STORAGE
FACILITY

| DRUM # | DATE IN | CONTENTS BY VOLUME | CLARK JOB/ACCT NO | INHOUSE GENERATOR | MATERIAL DISPOSAL | DRUM DISPOSAL | DATE DISPOSED |
|---|---|---|---|---|---|---|---|
| 924 | 12/29/93 | EMPTY | | NORTH PAD | | 20246 | 12/29/93 |
| 925 | 12/29/93 | EMPTY | | NORTH PAD | | 20246 | 12/29/93 |
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| 945 | 12/29/93 | EMPTY | | NORTH PAD | | 20246 | 12/29/93 |
| 946 | 12/29/93 | EMPTY | | NORTH PAD | | 20246 | 12/29/93 |
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| 968 | 12/29/93 | EMPTY | | NORTH PAD | | 20246 | 12/29/93 |

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| 908 | 12/27/93 | EMPTY | 62-3010 | NORTH P. | | 20139 | 12/28/93 |
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| 910 | 12/27/93 | EMPTY | | NORTH P. | | 20139 | 12/28/93 |
| 911 | 12/27/93 | EMPTY | | NORTH P. | | 20139 | 12/28/93 |
| 912 | 12/27/93 | EMPTY | | NORTH P. | | 20139 | 12/28/93 |
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| 915 | 12/27/93 | EMPTY | | NORTH P. | | 20139 | 12/28/93 |
| 916 | 12/27/93 | EMPTY | | NORTH P. | | 20139 | 12/28/93 |
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| 918 | 12/27/93 | EMPTY | | NORTH P. | | 20139 | 12/28/93 |
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| 920 | 12/27/93 | EMPTY | | NORTH P. | | 20246 | 12/29/93 |
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| 922 | 12/27/93 | EMPTY | | NORTH P. | | 20246 | 12/29/93 |
| 923 | 12/27/93 | EMPTY | | NORTH P. | | 20246 | 12/29/93 |

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| 863 | 12/27/93 | EMPTY | | NORTH P. | | 20139 | 12/28/93 |
| 864 | 12/27/93 | EMPTY | | NORTH P. | | 20139 | 12/28/93 |
| 865 | 12/27/93 | EMPTY | | NORTH P. | | 20139 | 12/28/93 |
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| 867 | 12/27/93 | EMPTY | | NORTH P. | | 20139 | 12/28/93 |
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| 887 | 12/27/93 | EMPTY | | NORTH P. | | 20139 | 12/28/93 |
| 888 | 12/27/93 | EMPTY | | NORTH P. | | 20139 | 12/28/93 |
| 889 | 12/27/93 | EMPTY | | NORTH P. | | 20139 | 12/28/93 |
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| 899 | 12/27/93 | EMPTY | | NORTH P. | | 20139 | 12/28/93 |
| 900 | 12/27/93 | EMPTY | | NORTH P. | | 20139 | 12/28/93 |
| 901 | 12/27/93 | EMPTY | | NORTH P. | | 20139 | 12/28/93 |
| 902 | 12/27/93 | EMPTY | | NORTH P. | | 20139 | 12/28/93 |
| 903 | 12/27/93 | EMPTY | | NORTH P. | | 20139 | 12/28/93 |
| 904 | 12/27/93 | EMPTY | | NORTH P. | | 20139 | 12/28/93 |
| 905 | 12/27/93 | EMPTY | | NORTH P. | | 20139 | 12/28/93 |
| 906 | 12/27/93 | EMPTY | | NORTH P. | | 20139 | 12/28/93 |
| 907 | 12/27/93 | EMPTY | | NORTH P. | | 20139 | 12/28/93 |

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| 814 | 12/27/93 | EMPTY | | BOILER H. | | 20139 | 12/28/93 |
| 815 | 12/27/93 | EMPTY | | NORTH P. | | 20139 | 12/28/93 |
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| 823 | 12/27/93 | EMPTY | | NORTH P. | | 20139 | 12/28/93 |
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| 825 | 12/27/93 | EMPTY | | NORTH P. | | 20139 | 12/28/93 |
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| 836 | 12/27/93 | EMPTY | | NORTH P. | | 20139 | 12/28/93 |
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| 839 | 12/27/93 | EMPTY | | NORTH P. | | 20139 | 12/28/93 |
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| 841 | 12/27/93 | EMPTY | | NORTH P. | | 20139 | 12/28/93 |
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| 850 | 12/27/93 | EMPTY | | NORTH P. | | 20139 | 12/28/93 |
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| 773 | 12/17/93 | EMPTY | | BOILER H. | | 20139 | 12/20/93 |
| 774 | 12/17/93 | EMPTY | | BOILER H. | | 20139 | 12/20/93 |
| 775 | 12/17/93 | EMPTY | | BOILER H. | | 20139 | 12/20/93 |
| 776 | 12/17/93 | EMPTY | | BOILER H. | | 20139 | 12/20/93 |
| 777 | 12/17/93 | EMPTY | | BOILER H. | | 20139 | 12/20/93 |
| 778 | 12/17/93 | EMPTY | | BOILER H. | | 20139 | 12/20/93 |
| 779 | 12/17/93 | EMPTY | | BOILER H. | | 20139 | 12/20/93 |
| 780 | 12/17/93 | EMPTY | | BOILER H. | | 20139 | 12/20/93 |
| 781 | 12/17/93 | EMPTY | | BOILER H. | | 20139 | 12/20/93 |
| 782 | 12/17/93 | EMPTY | | BOILER H. | | 20139 | 12/20/93 |
| 783 | 12/27/93 | EMPTY | | MAINTEN | | 20139 | 12/27/93 |
| 784 | 12/27/93 | EMPTY | | COOLING T. | | 20139 | 12/27/93 |
| 785 | 12/27/93 | EMPTY | | COOLING T. | | 20139 | 12/27/93 |
| 786 | 12/27/93 | EMPTY | | COOLING T. | | 20139 | 12/27/93 |
| 787 | 12/27/93 | EMPTY | | COOLING T. | | 20139 | 12/27/93 |
| 788 | 12/27/93 | EMPTY | | COOLING T. | | 20139 | 12/27/93 |
| 789 | 12/27/93 | EMPTY | | COOLING T. | | 20139 | 12/27/93 |
| 790 | 12/27/93 | EMPTY | | COOLING T. | | 20139 | 12/27/93 |
| 791 | 12/27/93 | EMPTY | | BUNDLE PAD | | 20139 | 12/27/93 |
| 792 | 12/27/93 | EMPTY | | REFORMER | | 20139 | 12/27/93 |
| 793 | 12/27/93 | EMPTY | | REFORMER | | 20139 | 12/27/93 |
| 794 | 12/27/93 | EMPTY | | NORTH PAD | | 20139 | 12/27/93 |
| 795 | 12/27/93 | EMPTY | | NORTH PAD | | 20139 | 12/27/93 |
| 796 | 12/27/93 | EMPTY | | NORTH PAD | | 20139 | 12/27/93 |
| 797 | 12/27/93 | EMPTY | | NORTH PAD | | 20139 | 12/27/93 |
| 798 | 12/27/93 | EMPTY | | NORTH PAD | | 20139 | 12/27/93 |
| 799 | 12/27/93 | EMPTY | | NORTH PAD | | 20139 | 12/27/93 |
| 800 | 12/27/93 | EMPTY | | NORTH PAD | | 20139 | 12/27/93 |
| 801 | 12/27/93 | EMPTY | | NORTH PAD | | 20139 | 12/27/93 |
| 802 | 12/27/93 | EMPTY | | NORTH PAD | | 20139 | 12/27/93 |
| 803 | 12/27/93 | EMPTY | | NORTH PAD | | 20139 | 12/27/93 |
| 804 | 12/27/93 | EMPTY | | NORTH PAD | | 20139 | 12/27/93 |
| 805 | 12/27/93 | EMPTY | | NORTH PAD | | 20139 | 12/27/93 |
| 806 | 12/27/93 | EMPTY | | NORTH PAD | | 20139 | 12/27/93 |
| 807 | 12/27/93 | EMPTY | | NORTH PAD | | 20139 | 12/27/93 |
| 808 | 12/27/93 | EMPTY | | NORTH PAD | | 20139 | 12/27/93 |

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|---|---|---|---|---|---|---|---|
| 705 | 12/9/93 | UNUSED CAT | 62-3010 | W.HOUSE | CLARK | N/A | N/A |
| 706 | 12/2/93 | UNUSED CAT | | W.HOUSE | CLARK | N/A | N/A |
| 707 | 12/2/93 | UNUSED CAT | | W.HOUSE | CLARK | N/A | N/A |
| 708 | 12/2/93 | UNUSED CAT | | W.HOUSE | CLARK | N/A | N/A |
| 709 | 12/2/93 | UNUSED CAT | | W.HOUSE | CLARK | N/A | N/A |
| 710 | 12/2/93 | UNUSED CAT | | MAINTEN | CLARK | N/A | N/A |
| 711 | 12/9/93 | SPENT CAT | | W.HOUSE | 2069 | RECLAIM | 1/13/94 |
| 712 | 12/9/93 | SPENT CAT | | W.HOUSE | 2069 | 20227 | 1/13/94 |
| 713 | 12/9/93 | UNUSED CAT | | W.HOUSE | CLARK | N/A | N/A |
| 714 | 12/9/93 | UNUSED CAT | | W.HOUSE | CLARK | N/A | N/A |
| 715 | 12/9/93 | UNUSED CAT | | W.HOUSE | CLARK | N/A | N/A |
| 716 | 12/9/93 | SPENT CAT | | W.HOUSE | 20249 | RECLAIM | 2/24/94 |
| 717 | 12/9/93 | SPENT CAT | | W.HOUSE | 20249 | 20227 | 2/23/94 |
| 718 | 12/9/93 | UNUSED CAT | | W.HOUSE | CLARK | N/A | N/A |
| 719 | 12/9/93 | UNUSED CAT | | W.HOUSE | CLARK | N/A | N/A |
| 720 | 12/9/93 | UNUSED CAT | | W.HOUSE | CLARK | N/A | N/A |
| 721 | 12/9/93 | UNUSED CAT | | W.HOUSE | CLARK | N/A | N/A |
| 722 | 12/9/93 | SPENT CAT | | W.HOUSE | 20249 | 20227 | 2/23/94 |
| 723 | 12/9/93 | SPENT CAT | | W.HOUSE | 20249 | 20227 | 2/23/94 |
| 724 | 12/9/93 | UNUSED CAT | | W.HOUSE | CLARK | N/A | N/A |
| 725 | 12/9/93 | UNUSED CAT | | W.HOUSE | 20249 | 20227 | 2/23/94 |
| 726 | 12/9/93 | SPENT CAT | | W.HOUSE | 2069 | 20227 | 2/23/94 |
| 727 | 12/9/93 | UNUSED CAT | | W.HOUSE | CLARK | N/A | N/A |
| 728 | 12/9/93 | UNUSED CAT | | W.HOUSE | CLARK | N/A | N/A |
| 729 | 12/9/93 | SPENT CAT | | W.HOUSE | 2069 | RECLAIM | 1/13/94 |
| 730 | 12/9/93 | UNUSED CAT | | W.HOUSE | CLARK | N/A | N/A |
| 731 | 12/9/93 | UNUSED CAT | | W.HOUSE | CLARK | N/A | N/A |
| 732 | 12/9/93 | UNUSED CAT | | MAINTEN | CLARK | N/A | N/A |
| 733 | 12/9/93 | UNUSED CAT | | MAINTEN | CLARK | N/A | N/A |
| 734 | 12/9/93 | UNUSED CAT | | MAINTEN | CLARK | N/A | N/A |
| 735 | 12/9/93 | UNUSED CAT | | MAINTEN | CLARK | N/A | N/A |
| 736 | 12/9/93 | UNUSED CAT | | MAINTEN | CLARK | N/A | N/A |
| 737 | 12/9/93 | UNUSED CAT | | W.HOUSE | CLARK | N/A | N/A |
| 738 | 12/9/93 | EMPTY | | MAINTEN | | 20107 | 12/10/93 |
| 739 | 12/10/93 | EMPTY | | MAINTEN | | 20107 | 12/10/93 |
| 740 | 12/10/93 | EMPTY | | MAINTEN | | 20107 | 12/10/93 |
| 741 | 12/10/93 | EMPTY | | MAINTEN | | 20107 | 12/10/93 |
| 742 | 12/10/93 | EMPTY | | MAINTEN | | 20107 | 12/10/93 |
| 743 | 12/10/93 | EMPTY | | MAINTEN | | 20107 | 12/10/93 |
| 744 | 12/10/93 | EMPTY | | MAINTEN | | 20107 | 12/10/93 |
| 745 | 12/10/93 | EMPTY | | MAINTEN | | 20107 | 12/10/93 |
| 746 | 12/10/93 | EMPTY | | MAINTEN | | 20107 | 12/10/93 |
| 747 | 12/10/93 | EMPTY | | MAINTEN | | 20107 | 12/10/93 |
| 748 | 12/10/93 | EMPTY | | MAINTEN | | 20107 | 12/10/93 |
| 749 | 12/10/93 | EMPTY | | MAINTEN | | 20107 | 12/10/93 |
| 750 | 12/17/93 | EMPTY | | BOILER H. | | 20139 | 12/20/93 |
| 751 | 12/17/93 | EMPTY | | BOILER H. | | 20139 | 12/20/93 |
| 752 | 12/17/93 | EMPTY | | BOILER H. | | 20139 | 12/20/93 |
| 753 | 12/17/93 | EMPTY | | BOILER H. | | 20139 | 12/20/93 |
| 754 | 12/17/93 | EMPTY | | BOILER H. | | 20139 | 12/20/93 |
| 755 | 12/17/93 | EMPTY | | BOILER H. | | 20139 | 12/20/93 |
| 756 | 12/17/93 | EMPTY | | BOILER H. | | 20139 | 12/20/93 |
| 757 | 12/17/93 | EMPTY | | BOILER H. | | 20139 | 12/20/93 |

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|---|---|---|---|---|---|---|---|
| 656 | 12/9/93 | EMPTY | 62-3010 | FIRE HOUSE | | 20107 | 12/10/93 |
| 657 | 12/9/93 | EMPTY | | FIRE HOUSE | | 20107 | 12/10/93 |
| 658 | 12/9/93 | EMPTY | | FIRE HOUSE | | 20107 | 12/10/93 |
| 659 | 12/9/93 | EMPTY | | FIRE HOUSE | | 20107 | 12/10/93 |
| 660 | 12/9/93 | EMPTY | | FIRE HOUSE | | 20107 | 12/10/93 |
| 661 | 12/9/93 | EMPTY | | FIRE HOUSE | | 20107 | 12/10/93 |
| 662 | 12/9/93 | EMPTY | | FIRE HOUSE | | 20107 | 12/10/93 |
| 663 | 12/9/93 | EMPTY | | FIRE HOUSE | | 20107 | 12/10/93 |
| 664 | 12/9/93 | EMPTY | | FIRE HOUSE | | 20107 | 12/10/93 |
| 665 | 12/9/93 | EMPTY | | FIRE HOUSE | | 20107 | 12/10/93 |
| 666 | 12/9/93 | EMPTY | | FIRE HOUSE | | 20107 | 12/10/93 |
| 667 | 12/9/93 | EMPTY | | FIRE HOUSE | | 20107 | 12/10/93 |
| 668 | 12/9/93 | EMPTY | | FIRE HOUSE | | 20107 | 12/10/93 |
| 669 | 12/9/93 | EMPTY | | FIRE HOUSE | | 20107 | 12/10/93 |
| 670 | 12/9/93 | UNUSED CAT | | FLUID | CLARK | N/A | N/A |
| 671 | 12/9/93 | UK FULL | | FLUID | CLARK | 20227 | 2/21/94 |
| 672 | 12/9/93 | UNUSED CAT | | W.HOUSE | CLARK | N/A | N/A |
| 673 | 12/9/93 | UK FULL | | W.HOUSE | CLARK | 20227 | 2/21/94 |
| 674 | 12/9/93 | UNUSED CAT | | W.HOUSE | CLARK | N/A | N/A |
| 675 | 12/9/93 | EMPTY | | W.HOUSE | | 20227 | 1/04/94 |
| 676 | 12/9/93 | UK FULL | | W.HOUSE | CLARK | 20227 | 2/21/94 |
| 677 | 12/9/93 | UNUSED CAT | | W.HOUSE | CLARK | N/A | N/A |
| 678 | 12/9/93 | UNUSED CAT | | W.HOUSE | CLARK | N/A | N/A |
| 679 | 12/9/93 | UK FULL | | W.HOUSE | 20242 | 20227 | 2/23/94 |
| 680 | 12/2/93 | UNUSED CAT | | MAINTEN | CLARK | N/A | N/A |
| 681 | 12/2/93 | UNUSED CAT | | MAINTEN | CLARK | N/A | N/A |
| 682 | 12/2/93 | UNUSED CAT | | MAINTEN | CLARK | N/A | N/A |
| 683 | 12/2/93 | UNUSED CAT | | MAINTEN | CLARK | N/A | N/A |
| 684 | 12/2/93 | UNUSED CAT | | MAINTEN | CLARK | N/A | N/A |
| 685 | 12/2/93 | UNUSED CAT | | MAINTEN | CLARK | N/A | N/A |
| 686 | 12/2/93 | UNUSED CAT | | MAINTEN | CLARK | N/A | N/A |
| 687 | 12/9/93 | EMPTY | | MAINTEN | | 20107 | 12/10/93 |
| 688 | 12/9/93 | EMPTY | | MAINTEN | | 20107 | 12/10/93 |
| 689 | 12/9/93 | SPENT CAT | | W.HOUSE | 20242 | 20227 | 2/23/94 |
| 690 | 12/9/93 | SPENT CAT | | W.HOUSE | 20242 | 20227 | 2/23/94 |
| 691 | 12/9/93 | SPENT CAT | | W.HOUSE | 20242 | 20227 | 2/23/94 |
| 692 | 12/9/93 | SPENT CAT | | W.HOUSE | 20242 | 20227 | 2/23/94 |
| 693 | 12/9/93 | SPENT CAT | | W.HOUSE | 20242 | 20227 | 2/23/94 |
| 694 | 12/9/93 | SPENT CAT | | W.HOUSE | 20242 | 20227 | 2/23/94 |
| 695 | 12/9/93 | SPENT CAT | | W.HOUSE | 20242 | 20227 | 2/23/94 |
| 696 | 12/9/93 | UNUSED CAT | | W.HOUSE | CLARK | N/A | N/A |
| 697 | 12/9/93 | UNUSED CAT | | W.HOUSE | CLARK | N/A | N/A |
| 698 | 12/9/93 | EMPTY | | W.HOUSE | | 20227 | 1/04/94 |
| 699 | 12/9/93 | UK FULL | | W.HOUSE | CLARK | 20227 | 2/21/94 |
| 700 | 12/9/93 | UNUSED CAT | | W.HOUSE | CLARK | N/A | N/A |
| 701 | 12/9/93 | UNUSED CAT | | W.HOUSE | CLARK | N/A | N/A |
| 702 | 12/9/93 | UNUSED CAT | | W.HOUSE | CLARK | N/A | N/A |
| 703 | 12/9/93 | UNUSED CAT | | W.HOUSE | CLARK | N/A | N/A |
| 704 | 12/9/93 | EMPTY | | FLUID | | 20227 | 1/04/94 |

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|---|---|---|---|---|---|---|---|
| 606 | 12/7/93 | EMPTY | 62-3010 | RECEIVING | | 20107 | 12/8/93 |
| 607 | 12/7/93 | EMPTY | | RECEIVING | | 20107 | 12/8/93 |
| 608 | 12/7/93 | EMPTY | | RECEIVING | | 20107 | 12/8/93 |
| 609 | 12/7/93 | EMPTY | | RECEIVING | | 20107 | 12/8/93 |
| 610 | 12/7/93 | EMPTY | | RECEIVING | | 20107 | 12/8/93 |
| 611 | 12/7/93 | EMPTY | | RECEIVING | | 20107 | 12/8/93 |
| 612 | 12/7/93 | EMPTY | | RECEIVING | | 20107 | 12/8/93 |
| 613 | 12/7/93 | EMPTY | | RECEIVING | | 20107 | 12/8/93 |
| 614 | 12/7/93 | EMPTY | | RECEIVING | | 20107 | 12/8/93 |
| 615 | 12/7/93 | EMPTY | | RECEIVING | | 20107 | 12/8/93 |
| 616 | 12/7/93 | EMPTY | | RECEIVING | | 20107 | 12/8/93 |
| 617 | 12/7/93 | EMPTY | | RECEIVING | | 20107 | 12/8/93 |
| 618 | 12/7/93 | EMPTY | | RECEIVING | | 20107 | 12/8/93 |
| 619 | 12/7/93 | EMPTY | | RECEIVING | | 20107 | 12/8/93 |
| 620 | 12/7/93 | EMPTY | | RECEIVING | | 20107 | 12/8/93 |
| 621 | 12/7/93 | EMPTY | | RECEIVING | | 20107 | 12/8/93 |
| 622 | 12/7/93 | EMPTY | | RECEIVING | | 20107 | 12/8/93 |
| 623 | 12/7/93 | EMPTY | | RECEIVING | | 20107 | 12/8/93 |
| 624 | 12/7/93 | EMPTY | | RECEIVING | | 20107 | 12/8/93 |
| 625 | 12/7/93 | EMPTY | | RECEIVING | | 20107 | 12/8/93 |
| 626 | 12/7/93 | EMPTY | | RECEIVING | | 20107 | 12/8/93 |
| 627 | 12/7/93 | EMPTY | | RECEIVING | | 20107 | 12/8/93 |
| 628 | 12/7/93 | EMPTY | | RECEIVING | | 20107 | 12/8/93 |
| 629 | 12/7/93 | EMPTY | | RECEIVING | | 20107 | 12/8/93 |
| 630 | 12/7/93 | EMPTY | | RECEIVING | | 20107 | 12/8/93 |
| 631 | 12/7/93 | EMPTY | | RECEIVING | | 20107 | 12/8/93 |
| 632 | 12/7/93 | EMPTY | | RECEIVING | | 20107 | 12/8/93 |
| 633 | 12/7/93 | EMPTY | | RECEIVING | | 20107 | 12/8/93 |
| 634 | 12/7/93 | EMPTY | | RECEIVING | | 20107 | 12/8/93 |
| 635 | 12/7/93 | EMPTY | | RECEIVING | | 20107 | 12/8/93 |
| 636 | 12/7/93 | EMPTY | | RECEIVING | | 20107 | 12/8/93 |
| 637 | 12/7/93 | EMPTY | | RECEIVING | | 20107 | 12/8/93 |
| 638 | 12/7/93 | EMPTY | | RECEIVING | | 20107 | 12/8/93 |
| 639 | 12/7/93 | EMPTY | | RECEIVING | | 20107 | 12/8/93 |
| 640 | 12/7/93 | EMPTY | | RECEIVING | | 20107 | 12/8/93 |
| 641 | 12/7/93 | EMPTY | | RECEIVING | | 20107 | 12/8/93 |
| 642 | 12/7/93 | EMPTY | | RECEIVING | | 20107 | 12/8/93 |
| 643 | 12/7/93 | EMPTY | | RECEIVING | | 20107 | 12/8/93 |
| 644 | 12/7/93 | EMPTY | | RECEIVING | | 20107 | 12/8/93 |
| 645 | 12/7/93 | EMPTY | | RECEIVING | | 20107 | 12/8/93 |
| 646 | 12/7/93 | EMPTY | | RECEIVING | | 20107 | 12/8/93 |
| 647 | 12/7/93 | EMPTY | | RECEIVING | | 20107 | 12/8/93 |
| 648 | 12/2/93 | UNUSED CAT | | MAINTEN | CLARK | N/A | N/A |
| 649 | 12/2/93 | UNUSED CAT | | MAINTEN | CLARK | N/A | N/A |
| 650 | 12/2/93 | UNUSED CAT | | MAINTEN | CLARK | N/A | N/A |
| 651 | 12/9/93 | EMPTY | | FIRE HOUSE | | 20107 | 12/10/93 |
| 652 | 12/9/93 | EMPTY | | FIRE HOUSE | | 20107 | 12/10/93 |
| 653 | 12/9/93 | EMPTY | | FIRE HOUSE | | 20107 | 12/10/93 |
| 654 | 12/9/93 | EMPTY | | FIRE HOUSE | | 20107 | 12/10/93 |
| 655 | 12/9/93 | EMPTY | | FIRE HOUSE | | 20107 | 12/10/93 |

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|---|---|---|---|---|---|---|---|
| 556 | 12/7/93 | EMPTY | 62-3010 | CRACKER | | 20208 | 12/8/93 |
| 557 | 12/7/93 | EMPTY | | CRACKER | | 20208 | 12/8/93 |
| 558 | 12/7/93 | EMPTY | | CRACKER | | 20208 | 12/8/93 |
| 559 | 12/7/93 | EMPTY | | CRACKER | | 20208 | 12/8/93 |
| 560 | 12/7/93 | EMPTY | | CRACKER | | 20208 | 12/8/93 |
| 561 | 12/7/93 | SPENT CAT | | RECEIVING | 2069 | 20139 | 12/20/93 |
| 562 | 12/7/93 | SPENT CAT | | RECEIVING | 2069 | 20139 | 12/20/93 |
| 563 | 12/7/93 | SPENT CAT | | RECEIVING | 2069 | 20139 | 12/20/93 |
| 564 | 12/7/93 | SPENT CAT | | RECEIVING | 2069 | 20139 | 12/20/93 |
| 565 | 12/7/93 | SPENT CAT | | RECEIVING | 2069 | 20139 | 12/20/93 |
| 566 | 12/7/93 | SPENT CAT | | RECEIVING | 2069 | 20139 | 12/20/93 |
| 567 | 12/7/93 | SPENT CAT | | RECEIVING | 2069 | 20139 | 12/20/93 |
| 568 | 12/7/93 | SPENT CAT | | RECEIVING | 2069 | 20139 | 12/20/93 |
| 569 | 12/7/93 | SPENT CAT | | RECEIVING | 2069 | 20139 | 12/20/93 |
| 570 | 12/7/93 | SPENT CAT | | RECEIVING | 2069 | 20139 | 12/20/93 |
| 571 | 12/7/93 | SPENT CAT | | RECEIVING | 2069 | 20139 | 12/20/93 |
| 572 | 12/7/93 | SPENT CAT | | RECEIVING | 2069 | 20139 | 12/20/93 |
| 573 | 12/7/93 | SPENT CAT | | RECEIVING | 2069 | 20139 | 12/20/93 |
| 574 | 12/7/93 | SPENT CAT | | RECEIVING | 2069 | 20139 | 12/20/93 |
| 575 | 12/7/93 | SPENT CAT | | RECEIVING | 2069 | 20139 | 12/20/93 |
| 576 | 12/7/93 | SPENT CAT | | RECEIVING | 2069 | 20139 | 12/20/93 |
| 577 | 12/7/93 | SPENT CAT | | RECEIVING | 2069 | 20139 | 12/20/93 |
| 578 | 12/7/93 | SPENT CAT | | RECEIVING | 2069 | 20139 | 12/20/93 |
| 579 | 12/7/93 | SPENT CAT | | RECEIVING | 2069 | 20139 | 12/20/93 |
| 580 | 12/7/93 | SPENT CAT | | RECEIVING | 2069 | 20139 | 12/20/93 |
| 581 | 12/7/93 | FILTERS | | RECEIVING | 3008 | 20139 | 12/21/93 |
| 582 | 12/7/93 | FILTERS | | RECEIVING | 3008 | 20139 | 12/21/93 |
| 583 | 12/7/93 | FILTERS | | RECEIVING | 3008 | 20139 | 12/21/93 |
| 584 | 12/7/93 | FILTERS | | RECEIVING | 3008 | 20139 | 12/21/93 |
| 585 | 12/7/93 | SPENT CAT | | RECEIVING | 2069 | 20139 | 12/20/93 |
| 586 | 12/7/93 | SPENT CAT | | RECEIVING | 2069 | 20139 | 12/20/93 |
| 587 | 12/7/93 | SPENT CAT | | RECEIVING | 2069 | 20139 | 12/20/93 |
| 588 | 12/7/93 | SPENT CAT | | RECEIVING | 2069 | 20139 | 12/20/93 |
| 589 | 12/7/93 | SPENT CAT | | RECEIVING | 2069 | 20139 | 12/20/93 |
| 590 | 12/7/93 | SPENT CAT | | RECEIVING | 2069 | 20139 | 12/20/93 |
| 591 | 12/7/93 | SPENT CAT | | RECEIVING | 2069 | 20139 | 12/20/93 |
| 592 | 12/7/93 | SPENT CAT | | RECEIVING | 2069 | 20139 | 12/20/93 |
| 593 | 12/7/93 | SPENT CAT | | RECEIVING | 2069 | 20139 | 12/20/93 |
| 594 | 12/7/93 | SPENT CAT | | RECEIVING | 2069 | 20139 | 12/20/93 |
| 595 | 12/7/93 | SPENT CAT | | RECEIVING | 2069 | 20139 | 12/20/93 |
| 596 | 12/7/93 | SPENT CAT | | RECEIVING | 2069 | 20139 | 12/20/93 |
| 597 | 12/7/93 | SPENT CAT | | RECEIVING | 2069 | 20139 | 12/20/93 |
| 598 | 12/7/93 | SPENT CAT | | RECEIVING | 2069 | 20139 | 12/20/93 |
| 599 | 12/7/93 | SPENT CAT | | RECEIVING | 2069 | 20139 | 12/20/93 |
| 600 | 12/7/93 | SPENT CAT | | RECEIVING | 2069 | 20139 | 12/20/93 |
| 601 | 12/7/93 | SPENT CAT | | RECEIVING | 2069 | 20139 | 12/20/93 |
| 602 | 12/7/93 | SPENT CAT | | RECEIVING | 2069 | 20139 | 12/20/93 |
| 603 | 12/7/93 | SPENT CAT | | RECEIVING | 2069 | 20139 | 12/20/93 |
| 604 | 12/7/93 | SPENT CAT | | RECEIVING | 2069 | 20139 | 12/20/93 |
| 605 | 12/7/93 | EMPTY | | RECEIVING | | 20107 | 12/8/93 |

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|---|---|---|---|---|---|---|---|
| 505 | 11/8/93 | EMPTY | 62-3010 | TANK FARM | | 20208 | 11/9/93 |
| 506 | 11/8/93 | EMPTY | | TANK FARM | | 20208 | 11/9/93 |
| 507 | 11/8/93 | EMPTY | | TANK FARM | | 20208 | 11/9/93 |
| 508 | 11/8/93 | EMPTY | | TANK FARM | | 20208 | 11/9/93 |
| 509 | 11/8/93 | OIL FULL | | TANK FARM | CLARK | 20208 | 12/8/93 |
| 510 | 11/8/93 | EMPTY | | TANK FARM | | 20208 | 11/9/93 |
| 511 | 11/8/93 | EMPTY | | TANK FARM | | 20208 | 11/9/93 |
| 512 | 11/8/93 | EMPTY | | TANK FARM | | 20208 | 11/9/93 |
| 513 | 11/8/93 | EMPTY | | TANK FARM | | 20208 | 11/9/93 |
| 514 | 11/8/93 | EMPTY | | TANK FARM | | 20208 | 11/9/93 |
| 515 | 11/8/93 | EMPTY | | TANK FARM | | 20208 | 11/9/93 |
| 516 | 11/8/93 | EMPTY | | TANK FARM | | 20208 | 11/9/93 |
| 517 | 11/8/93 | EMPTY | | TANK FARM | | 20208 | 11/9/93 |
| 518 | 11/8/93 | EMPTY | | TANK FARM | | 20208 | 11/9/93 |
| 519 | 11/8/93 | EMPTY | | TANK FARM | | 20208 | 11/9/93 |
| 520 | 11/8/93 | EMPTY | | TANK FARM | | 20208 | 11/9/93 |
| 521 | 11/8/93 | EMPTY | | TANK FARM | | 20208 | 11/9/93 |
| 522 | 11/8/93 | EMPTY | | TANK FARM | | 20208 | 11/9/93 |
| 523 | 11/8/93 | EMPTY | | TANK FARM | | 20208 | 11/9/93 |
| 524 | 11/8/93 | EMPTY | | TANK FARM | | 20208 | 11/9/93 |
| 525 | 11/8/93 | EMPTY | | TANK FARM | | 20208 | 11/9/93 |
| 526 | 11/8/93 | EMPTY | | TANK FARM | | 20208 | 11/9/93 |
| 527 | 11/8/93 | EMPTY | | TANK FARM | | 20208 | 11/9/93 |
| 528 | 11/8/93 | EMPTY | | TANK FARM | | 20208 | 11/9/93 |
| 529 | 11/8/93 | EMPTY | | TANK FARM | | 20208 | 11/9/93 |
| 530 | 11/8/93 | EMPTY | | TANK FARM | | 20208 | 11/9/93 |
| 531 | 11/8/93 | EMPTY | | TANK FARM | | 20208 | 11/9/93 |
| 532 | 11/8/93 | EMPTY | | TANK FARM | | 20208 | 11/9/93 |
| 533 | 11/8/93 | EMPTY | | TANK FARM | | 20208 | 11/9/93 |
| 534 | 11/8/93 | WATER | | TANK FARM | CLARK | 20208 | 12/2/93 |
| 535 | 11/8/93 | WATER | | TANK FARM | CLARK | 20208 | 12/2/93 |
| 536 | 11/8/93 | WATER | | TANK FARM | CLARK | 20208 | 12/2/93 |
| 537 | 11/8/93 | WATER | | TANK FARM | CLARK | 20208 | 12/2/93 |
| 538 | 11/8/93 | WATER | | TANK FARM | CLARK | 20208 | 12/2/93 |
| 539 | 11/8/93 | WATER | | TANK FARM | CLARK | 20208 | 12/2/93 |
| 540 | 12/2/93 | CONT ROCK | | REFORMER | 20109 | 20139 | 12/21/93 |
| 541 | 12/2/93 | CONT ROCK | | REFORMER | 20109 | 20139 | 12/21/93 |
| 542 | 12/2/93 | CONT ROCK | | REFORMER | 20109 | 20139 | 12/21/93 |
| 543 | 12/2/93 | UK LIQUID | | REFORMER | CLARK | 20107 | 12/10/93 |
| 544 | 12/2/93 | UK LIQUID | | REFORMER | CLARK | 20107 | 12/10/93 |
| 545 | 12/2/93 | UK LIQUID | | REFORMER | CLARK | 20107 | 12/10/93 |
| 546 | 12/6/93 | SPENT CAT | | RECEIVING | 2069 | 20139 | 12/20/93 |
| 547 | 12/6/93 | SPENT CAT | | RECEIVING | 2069 | 20139 | 12/20/93 |
| 548 | 12/6/93 | SPENT CAT | | RECEIVING | 2069 | 20139 | 12/20/93 |
| 549 | 12/6/93 | SPENT CAT | | RECEIVING | 2069 | 20139 | 12/20/93 |
| 550 | 12/6/93 | SPENT CAT | | RECEIVING | 2069 | 20139 | 12/20/93 |
| 551 | 12/6/93 | SPENT CAT | | RECEIVING | 2069 | 20139 | 12/20/93 |
| 552 | 12/6/93 | SPENT CAT | | RECEIVING | 2069 | 20139 | 12/20/93 |
| 553 | 12/6/93 | SPENT CAT | | RECEIVING | 2069 | 20139 | 12/20/93 |
| 554 | 12/6/93 | SPENT CAT | | RECEIVING | 2069 | 20139 | 12/20/93 |
| 555 | 12/6/93 | SPENT CAT | | RECEIVING | ~~2060~~ | ~~20139~~ | ~~12/20/93~~ |
| | | | | | 2069 | 20139 | 12/20/93 |

CLARK HAZARDOUS
DRUM STORAGE
FACILITY

| DRUM # | DATE IN | CONTENTS BY VOLUME | CLARK JOB/ACCT NO | INHOUSE GENERATOR | MATERIAL DISPOSAL | DRUM DISPOSAL | DATE DISPOSED |
|---|---|---|---|---|---|---|---|
| 462 | 11/5/93 | EMPTY | 62-3010 | TANK FARM | | CWM 531 | 11/6/93 |
| 463 | 11/5/93 | EMPTY | | TANK FARM | | CWM 531 | 11/6/93 |
| 464 | 11/5/93 | EMPTY | | TANK FARM | | CWM 531 | 11/6/93 |
| 465 | 11/5/93 | EMPTY | | TANK FARM | | CWM 531 | 11/6/93 |
| 466 | 11/8/93 | EMPTY | | TANK FARM | | 20208 | 11/9/93 |
| 467 | 11/8/93 | EMPTY | | TANK FARM | | 20208 | 11/9/93 |
| 468 | 11/8/93 | EMPTY | | TANK FARM | | 20208 | 11/9/93 |
| 469 | 11/8/93 | EMPTY | | TANK FARM | | 20208 | 11/9/93 |
| 470 | 11/8/93 | EMPTY | | TANK FARM | | 20208 | 11/9/93 |
| 471 | 11/8/93 | EMPTY | | TANK FARM | | 20208 | 11/9/93 |
| 472 | 11/8/93 | EMPTY | | TANK FARM | | 20208 | 11/9/93 |
| 473 | 11/8/93 | EMPTY | | TANK FARM | | 20208 | 11/9/93 |
| 474 | 11/8/93 | EMPTY | | TANK FARM | | 20208 | 11/9/93 |
| 475 | 11/8/93 | EMPTY | | TANK FARM | | 20208 | 11/9/93 |
| 476 | 11/8/93 | EMPTY | | TANK FARM | | 20208 | 11/9/93 |
| 477 | 11/8/93 | EMPTY | | TANK FARM | | 20208 | 11/9/93 |
| 478 | 11/8/93 | EMPTY | | TANK FARM | | 20208 | 11/9/93 |
| 479 | 11/8/93 | EMPTY | | TANK FARM | | 20208 | 11/9/93 |
| 480 | 11/8/93 | EMPTY | | TANK FARM | | 20208 | 11/9/93 |
| 481 | 11/8/93 | EMPTY | | TANK FARM | | 20208 | 11/9/93 |
| 482 | 11/8/93 | EMPTY | | TANK FARM | | 20208 | 11/9/93 |
| 483 | 11/8/93 | EMPTY | | TANK FARM | | 20208 | 11/9/93 |
| 484 | 11/8/93 | OIL FULL | | TANK FARM | CLARK | 20208 | 12/8/93 |
| 485 | 11/8/93 | EMPTY | | TANK FARM | | 20208 | 11/9/93 |
| 486 | 11/8/93 | EMPTY | | TANK FARM | | 20208 | 11/9/93 |
| 487 | 11/8/93 | EMPTY | | TANK FARM | | 20208 | 11/9/93 |
| 488 | 11/8/93 | EMPTY | | TANK FARM | | 20208 | 11/9/93 |
| 489 | 11/8/93 | EMPTY | | TANK FARM | | 20208 | 11/9/93 |
| 490 | 11/8/93 | EMPTY | | TANK FARM | | 20208 | 11/9/93 |
| 491 | 11/8/93 | EMPTY | | TANK FARM | | 20208 | 11/9/93 |
| 492 | 11/8/93 | EMPTY | | TANK FARM | | 20208 | 11/9/93 |
| 493 | 11/8/93 | EMPTY | | TANK FARM | | 20208 | 11/9/93 |
| 494 | 11/8/93 | EMPTY | | TANK FARM | | 20208 | 11/9/93 |
| 495 | 11/8/93 | EMPTY | | TANK FARM | | 20208 | 11/9/93 |
| 496 | 11/8/93 | EMPTY | | TANK FARM | | 20208 | 11/9/93 |
| 497 | 11/8/93 | EMPTY | | TANK FARM | | 20208 | 11/9/93 |
| 498 | 11/8/93 | EMPTY | | TANK FARM | | 20208 | 11/9/93 |
| 499 | 11/8/93 | EMPTY | | TANK FARM | | 20208 | 11/9/93 |
| 500 | 11/8/93 | EMPTY | | TANK FARM | | 20208 | 11/9/93 |
| 501 | 11/8/93 | EMPTY | | TANK FARM | | 20208 | 11/9/93 |
| 502 | 11/8/93 | EMPTY | | TANK FARM | | 20208 | 11/9/93 |
| 503 | 11/8/93 | EMPTY | | TANK FARM | | 20208 | 11/9/93 |
| 504 | 11/8/93 | EMPTY | | TANK FARM | | 20208 | 11/9/93 |

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|---|---|---|---|---|---|---|---|
| 440 | 11/5/93 | EMPTY | 62-3010 | TANK FARM | | CWM 531 | 11/6/93 |
| 441 | 11/5/93 | EMPTY | | TANK FARM | | CWM 531 | 11/6/93 |
| 442 | 11/5/93 | EMPTY | | TANK FARM | | CWM 531 | 11/6/93 |
| 443 | 11/5/93 | EMPTY | | TANK FARM | | CWM 531 | 11/6/93 |
| 444 | 11/5/93 | EMPTY | | TANK FARM | | CWM 531 | 11/6/93 |
| 445 | 11/5/93 | EMPTY | | TANK FARM | | CWM 531 | 11/6/93 |
| 446 | 11/5/93 | NALCO 2" | | TANK FARM | CLARK | 20208 | 12/8/93 |
| 447 | 11/5/93 | EMPTY | | TANK FARM | | CWM 531 | 11/6/93 |
| 448 | 11/5/93 | EMPTY | | TANK FARM | | CWM 531 | 11/6/93 |
| 449 | 11/5/93 | OIL FULL | | TANK FARM | CLARK | 20208 | 12/8/93 |
| 450 | 11/5/93 | EMPTY | | TANK FARM | | CWM 531 | 11/6/93 |
| 451 | 11/5/93 | EMPTY | | TANK FARM | | CWM 531 | 11/6/93 |
| 452 | 11/5/93 | EMPTY | | TANK FARM | | CWM 531 | 11/6/93 |
| 453 | 11/5/93 | EMPTY | | TANK FARM | | CWM 531 | 11/6/93 |
| 454 | 11/5/93 | EMPTY | | TANK FARM | | CWM 531 | 11/6/93 |
| 455 | 11/5/93 | EMPTY | | TANK FARM | | CWM 531 | 11/6/93 |
| 456 | 11/5/93 | EMPTY | | TANK FARM | | CWM 531 | 11/6/93 |
| 457 | 11/5/93 | EMPTY | | TANK FARM | | CWM 531 | 11/6/93 |
| 458 | 11/5/93 | EMPTY | | TANK FARM | | CWM 531 | 11/6/93 |
| 459 | 11/5/93 | EMPTY | | TANK FARM | | CWM 531 | 11/6/93 |
| 460 | 11/5/93 | EMPTY | | TANK FARM | | CWM 531 | 11/6/93 |
| 461 | 11/5/93 | EMPTY | | TANK FARM | | CWM 531 | 11/6/93 |

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|---|---|---|---|---|---|---|---|
| 395 | 10/29/93 | SPENT CAT | 62-3010 | COKER | 20109 | 20139 | 12/21/93 |
| 396 | 10/29/93 | SPENT CAT | | COKER | 20109 | 20139 | 12/21/93 |
| 397 | 10/29/93 | SPENT CAT | | COKER | 20109 | 20139 | 12/21/93 |
| 398 | 10/29/93 | EMPTY | | COKER | | CWM 531 | 11/6/93 |
| 399 | 10/29/93 | SPENT CAT | | COKER | 20109 | 20139 | 12/21/93 |
| 400 | 10/29/93 | SPENT CAT | | COKER | 20109 | 20139 | 12/21/93 |
| 401 | 10/29/93 | SPENT CAT | | COKER | 20109 | 20139 | 12/21/93 |
| 402 | 10/29/93 | SPENT CAT | | COKER | 20109 | 20139 | 12/21/93 |
| 403 | 10/27/93 | EMPTY | | W. HOUSE | | CWM 531 | 11/6/93 |
| 404 | 10/27/93 | EMPTY | | W. HOUSE | | CWM 531 | 11/6/93 |
| 405 | 10/27/93 | EMPTY | | W. HOUSE | | CWM 531 | 11/6/93 |
| 406 | 10/27/93 | EMPTY | | W. HOUSE | | CWM 531 | 11/6/93 |
| 407 | 11/3/93 | CUTTINGS | | POND AREA | 20106 | 20208 | 11/30/93 |
| 408 | 11/3/93 | CUTTINGS | | POND AREA | 15108 | CWM 531 | 12/5/93 |
| 409 | 10/28/93 | SLURRY | | W.HOUSE | 20106 | 20208 | 12/8/93 |
| 410 | 10/27/93 | EMPTY | | W.HOUSE | | CWM 531 | 11/6/93 |
| 411 | 10/27/93 | EMPTY | | W.HOUSE | | CWM 531 | 11/6/93 |
| 412 | 10/27/93 | EMPTY | | TANK FARM | | CWM 531 | 11/6/93 |
| 413 | 10/27/93 | EMPTY | | TANK FARM | | CWM 531 | 11/6/93 |
| 414 | 10/27/93 | EMPTY | | TANK FARM | | CWM 531 | 11/6/93 |
| 415 | 10/27/93 | EMPTY | | TANK FARM | | CWM 531 | 11/6/93 |
| 416 | 10/27/93 | EMPTY | | TANK FARM | | CWM 531 | 11/6/93 |
| 417 | 10/27/93 | EMPTY | | TANK FARM | | CWM 531 | 11/6/93 |
| 418 | 10/27/93 | CUTTINGS | | POND AREA | 20106 | 20208 | 12/1/93 |
| 419 | 10/27/93 | EMPTY | | TANK FARM | | CWM 531 | 11/6/93 |
| 420 | 11/3/93 | CUTTINGS | | POND AREA | 20106 | 20208 | 12/1/93 |
| 421 | 10/22/93 | EMPTY | | TANK FARM | | CWM 531 | 11/6/93 |
| 422 | 10/22/93 | EMPTY | | TANK FARM | | CWM 531 | 11/6/93 |
| 423 | 10/22/93 | EMPTY | | TANK FARM | | CWM 531 | 11/6/93 |
| 424 | 10/22/93 | EMPTY | | TANK FARM | | CWM 531 | 11/6/93 |
| 425 | 10/22/93 | EMPTY | | TANK FARM | | CWM 531 | 11/6/93 |
| 426 | 10/22/93 | EMPTY | | TANK FARM | | CWM 531 | 11/6/93 |
| 427 | 10/22/93 | EMPTY | | TANK FARM | | CWM 531 | 11/6/93 |
| 428 | 10/22/93 | EMPTY | | TANK FARM | | CWM 531 | 11/6/93 |
| 429 | 11/3/93 | CUTTINGS | | POND AREA | 20106 | 20208 | 11/30/93 |
| 430 | 10/28/93 | SLURRY | | TANK FARM | 20106 | 20208 | 12/8/93 |
| 431 | 11/3/93 | CUTTINGS | | POND AREA | 20106 | 20208 | 11/30/93 |
| 432 | 11/3/93 | CUTTINGS | | POND AREA | 20106 | 20208 | 11/30/93 |
| 433 | 11/4/93 | EMPTY | | FIRE AREA | | CWM 531 | 11/6/93 |
| 434 | 11/4/93 | EMPTY | | TANK FARM | | CWM 531 | 11/6/93 |
| 435 | 11/4/93 | EMPTY | | TANK FARM | | CWM 531 | 11/6/93 |
| 436 | 11/3/93 | EMPTY | | TANK FARM | | CWM 531 | 11/6/93 |
| 437 | 11/3/93 | EMPTY | | TANK FARM | | CWM 531 | 11/6/93 |
| 438 | 11/5/93 | EMPTY | | TANK FARM | | CWM 531 | 11/6/93 |
| 439 | 11/5/93 | EMPTY | | TANK FARM | | CWM 531 | 11/6/93 |
| 440 | 11/5/93 | EMPTY | | TANK FARM | | CWM 531 | 11/6/93 |
| 441 | 11/5/93 | EMPTY | | TANK FARM | | CWM 531 | 11/6/93 |
| 442 | 11/5/93 | EMPTY | | TANK FARM | | CWM 531 | 11/6/93 |
| 443 | 11/5/93 | EMPTY | | TANK FARM | | CWM 531 | 11/6/93 |
| 444 | 11/5/93 | EMPTY | | TANK FARM | | CWM 531 | 11/6/93 |
| 445 | 11/5/93 | EMPTY | | TANK FARM | | CWM 531 | 11/6/93 |
| 446 | 11/5/93 | NALCO 2" | | TANK FARM | CLARK | 20208 | 12/8/93 |
| 447 | 11/5/93 | EMPTY | | TANK FARM | | CWM 531 | 11/6/93 |

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|---|---|---|---|---|---|---|---|
| 345 | 10/28/93 | PACKING | 62-3010 | REFORMER | 20124 | N/A | 12/3/93 |
| 346 | 10/27/93 | EMPTY | | REFORMER | | CWM 531 | 11/6/93 |
| 347 | 10/27/93 | EMPTY | | REFORMER | | CWM 531 | 11/6/93 |
| 348 | 10/27/93 | EMPTY | | REFORMER | | CWM 531 | 11/6/93 |
| 349 | 10/27/93 | EMPTY | | REFORMER | | CWM 531 | 11/6/93 |
| 350 | 10/27/93 | EMPTY | | REFORMER | | CWM 531 | 11/6/93 |
| 351 | 10/28/93 | EMPTY | | REFORMER | | CWM 531 | 11/6/93 |
| 352 | 10/28/93 | EMPTY | | REFORMER | | CWM 531 | 11/6/93 |
| 353 | 10/28/93 | EMPTY | | REFORMER | | CWM 531 | 11/6/93 |
| 354 | 10/28/93 | EMPTY | | REFORMER | | CWM 531 | 11/6/93 |
| 355 | 10/28/93 | EMPTY | | REFORMER | | CWM 531 | 11/6/93 |
| 356 | 10/28/93 | EMPTY | | REFORMER | | CWM 531 | 11/6/93 |
| 357 | 10/28/93 | EMPTY | | REFORMER | | CWM 531 | 11/6/93 |
| 358 | 10/28/93 | EMPTY | | REFORMER | | CWM 531 | 11/6/93 |
| 359 | 10/28/93 | EMPTY | | REFORMER | | CWM 531 | 11/6/93 |
| 360 | 10/28/93 | EMPTY | | REFORMER | | CWM 531 | 11/6/93 |
| 361 | 10/28/93 | EMPTY | | REFORMER | | CWM 531 | 11/6/93 |
| 362 | 10/28/93 | EMPTY | | REFORMER | | CWM 531 | 11/6/93 |
| 363 | 10/28/93 | EMPTY | | REFORMER | | CWM 531 | 11/6/93 |
| 364 | 10/28/93 | EMPTY | | REFORMER | | CWM 531 | 11/6/93 |
| 365 | 10/28/93 | EMPTY | | REFORMER | | CWM 531 | 11/6/93 |
| 366 | 10/28/93 | EMPTY | | REFORMER | | CWM 531 | 11/6/93 |
| 367 | 10/28/93 | EMPTY | | REFORMER | | CWM 531 | 11/6/93 |
| 368 | 10/28/93 | EMPTY | | REFORMER | | CWM 531 | 11/6/93 |
| 369 | 10/27/93 | EMPTY | | REFORMER | | CWM 531 | 11/6/93 |
| 370 | 10/27/93 | EMPTY | | REFORMER | | CWM 531 | 11/6/93 |
| 371 | 10/27/93 | EMPTY | | REFORMER | | CWM 531 | 11/6/93 |
| 372 | 10/27/93 | EMPTY | | REFORMER | | CWM 531 | 11/6/93 |
| 373 | 10/27/93 | EMPTY | | REFORMER | | CWM 531 | 11/6/93 |
| 374 | 10/29/93 | SPENT CAT | | COKER | 20109 | 20139 | 12/21/93 |
| 375 | 10/29/93 | SPENT CAT | | COKER | 20109 | 20139 | 12/21/93 |
| 376 | 10/29/93 | SPENT CAT | | COKER | 20109 | 20139 | 12/21/93 |
| 377 | 10/29/93 | SPENT CAT | | COKER | 20109 | 20139 | 12/21/93 |
| 378 | 10/29/93 | SPENT CAT | | COKER | 20109 | 20139 | 12/21/93 |
| 379 | 10/29/93 | SPENT CAT | | COKER | 20109 | 20139 | 12/21/93 |
| 380 | 10/29/93 | EMPTY | | COKER | | CWM 531 | 11/6/93 |
| 381 | 10/29/93 | SPENT CAT | | COKER | 20109 | 20139 | 12/21/93 |
| 382 | 10/29/93 | SPENT CAT | | COKER | 20109 | 20139 | 12/21/93 |
| 383 | 10/29/93 | SPENT CAT | | COKER | 20109 | 20139 | 12/21/93 |
| 384 | 10/29/93 | SPENT CAT | | COKER | 20109 | 20139 | 12/21/93 |
| 385 | 10/29/93 | SPENT CAT | | COKER | 20109 | 20139 | 12/21/93 |
| 386 | 10/29/93 | SPENT CAT | | COKER | 20109 | 20139 | 12/21/93 |
| 387 | 10/29/93 | SPENT CAT | | COKER | 20109 | 20139 | 12/21/93 |
| 388 | 10/29/93 | SPENT CAT | | COKER | 20109 | 20139 | 12/21/93 |
| 389 | 10/29/93 | SPENT CAT | | COKER | 20109 | 20139 | 12/21/93 |
| 390 | 10/29/93 | SPENT CAT | | COKER | 20109 | 20139 | 12/21/93 |
| 391 | 10/29/93 | EMPTY | | COKER | | CWM 531 | 11/6/93 |
| 392 | 10/29/93 | SPENT CAT | | COKER | 20109 | 20139 | 12/21/93 |
| 393 | 10/29/93 | SPENT CAT | | COKER | 20109 | 20139 | 12/21/93 |
| 394 | 10/29/93 | SPENT CAT | | COKER | 20109 | 20139 | 12/21/93 |

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|---|---|---|---|---|---|---|---|
| 294 | 11/4/93 | UK 1/2 | 62-3010 | BOILER | CLARK | 20208 | 12/8/93 |
| 295 | 11/4/93 | UK 1 | | BOILER | CLARK | 20208 | 12/8/93 |
| 296 | 11/4/93 | EMPTY | | BOILER | | CWM 531 | 11/6/93 |
| 297 | 11/4/93 | LIME | | BOILER | 20208 | 20227 | 1/24/94 |
| 298 | 11/4/93 | LIME | | BOILER | 20208 | 20227 | 1/24/94 |
| 299 | 11/4/93 | LIME | | BOILER | 20208 | 20227 | 1/24/94 |
| 300 | 11/4/93 | UK FUKK | | FLUID | CLARK | 20208 | 12/8/93 |
| 301 | 11/4/93 | OIL(HTC) | | FLUID | CLARK | 20208 | 12/8/93 |
| 302 | 11/4/93 | OIL FULL | | FLUID | CLARK | 20208 | 12/8/93 |
| 303 | 11/4/93 | OIL FULL | | FLUID | CLARK | 20208 | 12/8/93 |
| 304 | 11/4/93 | OIL FULL | | FLUID | CLARK | 20208 | 12/8/93 |
| 305 | 11/4/93 | UK FULL | | FLUID | CLARK | 20208 | 12/8/93 |
| 306 | 11/4/93 | SLUDGE 1 | | FLUID | CLARK | 20208 | 12/8/93 |
| 307 | 11/4/93 | OIL FULL | | FLUID | CLARK | 20208 | 12/8/93 |
| 308 | 11/4/93 | OIL FULL | | FLUID | CLARK | 20208 | 12/8/93 |
| 309 | 11/4/93 | OIL FULL | | FLUID | CLARK | 20208 | 12/8/93 |
| 310 | 11/4/93 | OIL FULL | | MAINTEN | CLARK | 20208 | 12/8/93 |
| 311 | 11/4/93 | UK 1/3 | | MAINTEN | CLARK | 20208 | 12/8/93 |
| 312 | 10/29/93 | EMPTY | | MAINTEN | | CWM 531 | 11/6/93 |
| 313 | 10/29/93 | EMPTY | | MAINTEN | | CWM 531 | 11/6/93 |
| 314 | 11/4/93 | SLUDGE 1/4 | | MAINTEN | 20152 | 20227 | 2/24/94 |
| 315 | 10/29/93 | OIL FULL | | MAINTEN | CLARK | 20208 | 12/8/93 |
| 316 | 10/29/93 | EMPTY | | MAINTEN | | 20208 | 12/1/93 |
| 317 | 10/29/93 | OIL FULL | | REFORMER | CLARK | 20208 | 12/8/93 |
| 318 | 10/29/93 | OIL FULL | | REFORMER | CLARK | 20208 | 12/8/93 |
| 319 | 11/4/93 | OIL FULL | | REFORMER | CLARK | 20208 | 12/8/93 |
| 320 | 11/4/93 | TAR PALLET | | CRACKER | 20152 | 20227 | 2/24/94 |
| 321 | 11/4/93 | CAT FULL | | CRACKER | 20109 | 20139 | 12/21/93 |
| 322 | 11/4/93 | OIL FULL | | CRACKER | CLARK | 20208 | 12/8/93 |
| 323 | 11/3/93 | OIL 1/2 | | CRACKER | CLARK | 20208 | 12/8/93 |
| 324 | 10/29/93 | EMPTY | | CRACKER | | CWM 531 | 11/6/93 |
| 325 | 11/3/93 | SLUDGE | | CRACKER | CLARK | 20208 | 12/8/94 |
| 326 | 10/29/93 | EMPTY | | CRACKER | | CWM 531 | 11/6/93 |
| 327 | 10/29/93 | EMPTY | | CRACKER | | CWM 531 | 11/6/93 |
| 328 | 11/4/93 | LIME | | ALKI | 20125 | 20227 | 1/24/94 |
| 329 | 10/29/93 | EMPTY | | WASH SLAB | | CWM 531 | 11/6/93 |
| 330 | 10/29/93 | EMPTY | | COKER | | CWM 531 | 11/6/93 |
| 331 | 10/27/93 | EMPTY | | COKER | | CWM 531 | 11/6/93 |
| 332 | 10/28/93 | OIL FULL | | COKER | CLARK | 20107 | 12/8/93 |
| 333 | 10/28/93 | OIL FULL | | COKER | CLARK | 20208 | 12/8/93 |
| 334 | 10/28/93 | OIL FULL | | REFORMER | CLARK | 20208 | 12/8/93 |
| 335 | 10/28/93 | OIL FULL | | REFORMER | CLARK | 20208 | 12/8/93 |
| 336 | 10/28/93 | OIL FULL | | REFORMER | CLARK | 20208 | 12/8/93 |
| 337 | 10/27/93 | EMPTY | | REFORMER | | CWM 531 | 11/6/93 |
| 338 | 10/27/93 | EMPTY | | REFORMER | | CWM 531 | 11/6/93 |
| 339 | 10/28/93 | LIME | | REFORMER | 20125 | 20227 | 1/24/94 |
| 340 | 10/27/93 | LIME | | REFORMER | 20125 | 20227 | 1/24/94 |
| 341 | 10/27/93 | EMPTY | | REFORMER | | CWM 531 | 11/6/93 |
| 342 | 10/27/93 | EMPTY | | REFORMER | | CWM 531 | 11/6/93 |
| 343 | 10/27/93 | EMPTY | | REFORMER | | CWM 531 | 11/6/93 |
| 344 | 10/27/93 | EMPTY | | REFORMER | | CWM 531 | 11/6/93 |

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| 244 | 11/4/93 | EMPTY | 62-3010 | REFORMER | | CWM 531 | 11/5/93 |
| 245 | 11/4/93 | EMPTY | | REFORMER | | CWM 531 | 11/5/93 |
| 246 | 11/4/93 | EMPTY | | REFORMER | | CWM 531 | 11/5/93 |
| 247 | 11/4/93 | EMPTY | | REFORMER | | CWM 531 | 11/5/93 |
| 248 | 11/4/93 | EMPTY | | REFORMER | | CWM 531 | 11/5/93 |
| 249 | 11/4/93 | EMPTY | | E. PLANT | | CWM 531 | 11/5/93 |
| 250 | 11/4/93 | EMPTY | | E. PLANT | | CWM 531 | 11/5/93 |
| 251 | 11/4/93 | EMPTY | | E. PLANT | | CWM 531 | 11/5/93 |
| 252 | 11/4/93 | EMPTY | | E. PLANT | | CWM 531 | 11/5/93 |
| 253 | 11/4/93 | EMPTY | | E. PLANT | | CWM 531 | 11/5/93 |
| 254 | 11/4/93 | EMPTY | | E. PLANT | | CWM 531 | 11/5/93 |
| 255 | 11/4/93 | EMPTY | | E. PLANT | | CWM 531 | 11/5/93 |
| 256 | 11/4/93 | EMPTY | | E. PLANT | | CWM 531 | 11/5/93 |
| 257 | 11/4/93 | EMPTY | | E. PLANT | | CWM 531 | 11/5/93 |
| 258 | 11/4/93 | EMPTY | | E. PLANT | | CWM 531 | 11/5/93 |
| 259 | 11/4/93 | EMPTY | | E. PLANT | | CWM 531 | 11/5/93 |
| 260 | 11/4/93 | EMPTY | | E. PLANT | | CWM 531 | 11/5/93 |
| 261 | 11/4/93 | OIL 1/4 | | E. PLANT | CLARK | 20208 | 12/08/93 |
| 262 | 11/4/93 | EMPTY | | E. PLANT | | 20208 | 11/6/93 |
| 263 | 11/4/93 | DURO S315 | | E. PLANT | CLARK | 20208 | 12/8/93 |
| 264 | 11/4/93 | OIL 12" | | E. PLANT | CLARK | 20208 | 12/8/93 |
| 265 | 11/4/93 | OIL 1 | | E. PLANT | CLARK | 20208 | 12/8/93 |
| 266 | 11/4/93 | UK 3/4 | | E. PLANT | CLARK | 20208 | 12/8/93 |
| 267 | 11/4/93 | OIL 1/4 | | E. PLANT | CLARK | 20208 | 12/2/93 |
| 268 | 11/4/93 | OIL 1 | | E. PLANT | CLARK | 20208 | 12/8/93 |
| 269 | 11/4/93 | OIL 1 | | E. PLANT | CLARK | 20208 | 12/8/93 |
| 270 | 11/4/93 | CAUSTIC | | ALKI | CLARK | 20208 | 12/8/93 |
| 271 | 11/4/93 | SPENT CAT | | COKER | 20109 | 20139 | 12/21/93 |
| 272 | 11/4/93 | WATER 1/2 | | COKER | CLARK | 20208 | 12/2/93 |
| 273 | 11/4/93 | EMPTY | | REFORMER | | CWM 531 | 11/5/93 |
| 274 | 11/4/93 | EMPTY | | REFORMER | | CWM 531 | 11/5/93 |
| 275 | 11/4/93 | EMPTY | | REFORMER | | CWM 531 | 11/5/93 |
| 276 | 11/4/93 | EMPTY | | WASH SLAB | | CWM 531 | 11/5/93 |
| 277 | 11/4/93 | UK 2" | | WASH SLAB | CLARK | 20208 | 12/8/93 |
| 278 | 11/4/93 | CLEANER | | WASH SLAB | | SCRAP Y | 2/23/94 |
| 279 | 11/4/93 | EMPTY | | WASH SLAB | | CWM 531 | 11/6/93 |
| 280 | 11/4/93 | EMPTY | | WASH SLAB | | CWM 531 | 11/6/93 |
| 281 | 11/4/93 | UK 1/4 | | WASH SLAB | CLARK | 20208 | 12/8/93 |
| 282 | 11/4/93 | EMPTY | | WASH SLAB | | CWM 531 | 11/6/93 |
| 283 | 11/4/93 | EMPTY | | WASH SLAB | | CWM 531 | 11/6/93 |
| 284 | 11/4/93 | OIL FULL | | WASH SLAB | CLARK | 20208 | 11/6/93 |
| 285 | 11/4/93 | EMPTY | | WASH SLAB | | CWM 531 | 11/6/93 |
| 286 | 11/4/93 | EMPTY | | BOILER | | CWM 531 | 11/6/93 |
| 287 | 11/4/93 | EMPTY | | BOILER | | CWM 531 | 11/6/93 |
| 288 | 11/4/93 | EMPTY | | BOILER | | CWM 531 | 11/6/93 |
| 289 | 11/4/93 | OIL 1 | | BOILER | CLARK | 20208 | 12/8/93 |
| 290 | 11/4/93 | UK 1 | | BOILER | CLARK | 20208 | 12/8/93 |
| 291 | 11/4/93 | DURO S100 | | BOILER | CLARK | 20208 | 12/8/93 |
| 292 | 11/4/93 | EMPTY | | BOILER | | CWM 531 | 11/6/93 |
| 293 | 11/4/93 | EMPTY | | BOILER | | CWM 531 | 11/6/93 |

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|---|---|---|---|---|---|---|---|
| 193 | 11/4/93 | EMPTY | 62-3010 | FIRE AREA | | CWM 531 | 11/5/93 |
| 194 | 11/4/93 | EMPTY | | FIRE AREA | | CWM 531 | 11/5/93 |
| 195 | 11/4/93 | EMPTY | | FIRE AREA | | CWM 531 | 11/5/93 |
| 196 | 11/4/93 | EMPTY | | FIRE AREA | | CWM 531 | 11/5/93 |
| 197 | 11/4/93 | EMPTY | | FIRE AREA | | CWM 531 | 11/5/93 |
| 198 | 11/4/93 | OIL 2" | | COKER | CLARK | 20208 | 12/8/93 |
| 199 | 11/4/93 | OIL 1 | | COKER | CLARK | 20208 | 12/8/93 |
| 200 | 11/4/93 | AW49/215 | | COKER | CLARK | 20208 | 12/8/93 |
| 201 | 11/4/93 | EMPTY | | COKER | | CWM 531 | 11/5/93 |
| 202 | 11/4/93 | EMPTY | | COKER | | CWM 531 | 11/5/93 |
| 203 | 11/4/93 | EMPTY | | COKER | | CWM 531 | 11/5/93 |
| 204 | 11/4/93 | EMPTY | | COKER | | CWM 531 | 11/5/93 |
| 205 | 11/4/93 | EMPTY | | COKER | | CWM 531 | 11/5/93 |
| 206 | 11/4/93 | EMPTY | | COKER | | CWM 531 | 11/5/93 |
| 207 | 11/4/93 | EMPTY | | COKER | | CWM 531 | 11/5/93 |
| 208 | 11/4/93 | EMPTY | | COKER | | CWM 531 | 11/5/93 |
| 209 | 11/4/93 | EMPTY | | COKER | | CWM 531 | 11/5/93 |
| 210 | 11/4/93 | EMPTY | | COKER | | CWM 531 | 11/5/93 |
| 211 | 11/4/93 | EMPTY | | COKER | | CWM 531 | 11/5/93 |
| 212 | 11/4/93 | EMPTY | | COKER | | CWM 531 | 11/5/93 |
| 213 | 11/4/93 | EMPTY | | COKER | | CWM 531 | 11/5/93 |
| 214 | 11/4/93 | EMPTY | | COKER | | CWM 531 | 11/5/93 |
| 215 | 11/4/93 | EMPTY | | COKER | | CWM 531 | 11/5/93 |
| 216 | 11/4/93 | EMPTY | | COKER | | CWM 531 | 11/5/93 |
| 217 | 11/4/93 | EMPTY | | COKER | | CWM 531 | 11/5/93 |
| 218 | 11/4/93 | EMPTY | | COKER | | CWM 531 | 11/5/93 |
| 219 | 11/4/93 | EMPTY | | COKER | | CWM 531 | 11/5/93 |
| 220 | 11/4/93 | EMPTY | | COKER | | CWM 531 | 11/5/93 |
| 221 | 11/4/93 | EMPTY | | COKER | | CWM 531 | 11/5/93 |
| 222 | 11/4/93 | EMPTY | | COKER | | CWM 531 | 11/5/93 |
| 223 | 11/4/93 | EMPTY | | COKER | | CWM 531 | 11/5/93 |
| 224 | 11/4/93 | EMPTY | | COKER | | CWM 531 | 11/5/93 |
| 225 | 11/4/93 | EMPTY | | COKER | | CWM 531 | 11/5/93 |
| 226 | 11/4/93 | TRASH | | COKER | 20124 | 20208 | 12/2/93 |
| 227 | 11/4/93 | EMPTY | | REFORMER | | CWM 531 | 11/5/93 |
| 228 | 11/4/93 | EMPTY | | REFORMER | | CWM 531 | 11/5/93 |
| 229 | 11/4/93 | EMPTY | | REFORMER | | CWM 531 | 11/5/93 |
| 230 | 11/4/93 | EMPTY | | REFORMER | | CWM 531 | 11/5/93 |
| 231 | 11/4/93 | EMPTY | | REFORMER | | CWM 531 | 11/5/93 |
| 232 | 11/4/93 | EMPTY | | REFORMER | | CWM 531 | 11/5/93 |
| 233 | 11/4/93 | EMPTY | | REFORMER | | CWM 531 | 11/5/93 |
| 234 | 11/4/93 | EMPTY | | REFORMER | | CWM 531 | 11/5/93 |
| 235 | 11/4/93 | EMPTY | | REFORMER | | CWM 531 | 11/5/93 |
| 236 | 11/4/93 | EMPTY | | REFORMER | | CWM 531 | 11/5/93 |
| 237 | 11/4/93 | TOLUENE | | REFORMER | CLARK | 20208 | 12/8/93 |
| 238 | 11/4/93 | EMPTY | | REFORMER | | CWM 531 | 11/5/93 |
| 239 | 11/4/93 | EMPTY | | REFORMER | | CWM 531 | 11/5/93 |
| 240 | 11/4/93 | EMPTY | | REFORMER | | CWM 531 | 11/5/93 |
| 241 | 11/4/93 | EMPTY | | REFORMER | | CWM 531 | 11/5/93 |
| 242 | 11/4/93 | EMPTY | | REFORMER | | CWM 531 | 11/5/93 |
| 243 | 11/4/93 | EMPTY | | REFORMER | | CWM 531 | 11/5/93 |

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|---|---|---|---|---|---|---|---|
| 144 | 11/3/93 | OIL | 62-3010 | COKER | CLARK | 20107 | 12/9/93 |
| 145 | 11/3/93 | EMPTY | | REFORMER | | 531 | 11/4/93 |
| 146 | 11/3/93 | UK 1/2 | | COKER | CLARK | 20107 | 12/9/93 |
| 147 | 11/3/93 | OILY SLUD | | COKER | 2022 | 20227 | 1/12/94 |
| 148 | 11/3/93 | UK 1 | | MAINTEN | CLARK | 20208 | 12/8/93 |
| 149 | 11/3/93 | UK 1 | | MAINTEN | CLARK | 20208 | 12/8/93 |
| 150 | 11/3/93 | WATER 1 | | MAINTEN | CLARK | 20208 | 12/8/93 |
| 151 | 11/3/93 | OIL SLUDGE | | HAZ PAD | 2022 | 20227 | 1/12/94 |
| 152 | 11/3/93 | OIL SLUDGE | | HAZ PAD | 2022 | 20227 | 1/12/94 |
| 153 | 11/3/93 | OIL 1 | | HAZ PAD | CLARK | 20208 | 12/8/93 |
| 154 | 11/3/93 | OIL 1 | | HAZ PAD | CLARK | 20208 | 12/8/93 |
| 155 | 11/3/93 | CUTTINGS | | POND AREA | 20106 | 20208 | 11/30/93 |
| 156 | 11/3/93 | CUTTINGS | | POND AREA | 15108 | 20208 | 11/05/93 |
| 157 | 11/3/93 | CUTTINGS | | POND AREA | 20106 | 20208 | 12/01/93 |
| 158 | 11/3/93 | CUTTINGS | | POND AREA | 20106 | 20208 | 11/30/93 |
| 159 | 11/3/93 | CUTTINGS | | POND AREA | 20106 | 20208 | 11/30/93 |
| 160 | 11/3/93 | FILTERS 1 | | HAZ PAD | 3008 | 20139 | 12/21/93 |
| 161 | 11/3/93 | FILTERS 1 | | HAZ PAD | 3008 | 20139 | 12/21/93 |
| 162 | 10/28/93 | EMPTY | | MAINTEN | | CWM 531 | 11/05/93 |
| 162 | 10/28/93 | EMPTY | | MAINTEN | | CWM 531 | 11/05/93 |
| 163 | 10/28/93 | EMPTY | | MAINTEN | | CWM 531 | 11/05/93 |
| 164 | 10/28/93 | EMPTY | | MAINTEN | | CWM 531 | 11/05/93 |
| 165 | 10/28/93 | EMPTY | | MAINTEN | | CWM 531 | 11/05/93 |
| 166 | 10/28/93 | EMPTY | | MAINTEN | | CWM 531 | 11/05/93 |
| 167 | 10/28/93 | EMPTY | | MAINTEN | | CWM 531 | 11/05/93 |
| 168 | 10/28/93 | EMPTY | | MAINTEN | | CWM 531 | 11/05/93 |
| 169 | 10/28/93 | EMPTY | | MAINTEN | | CWM 531 | 11/05/93 |
| 170 | 10/28/93 | EMPTY | | MAINTEN | | CWM 531 | 11/05/93 |
| 171 | 10/28/93 | EMPTY | | MAINTEN | | CWM 531 | 11/05/93 |
| 172 | 10/28/93 | EMPTY | | MAINTEN | | CWM 531 | 11/05/93 |
| 173 | 10/28/93 | EMPTY | | MAINTEN | | CWM 531 | 11/05/93 |
| 174 | 10/28/93 | EMPTY | | MAINTEN | | CWM 531 | 11/05/93 |
| 175 | 10/28/93 | EMPTY | | MAINTEN | | CWM 531 | 11/05/93 |
| 176 | 10/28/93 | ASTM 1/16 | | MAINTEN | CLARK | 20208 | 12/8/93 |
| 177 | 10/28/93 | EMPTY | | MAINTEN | | CWM 531 | 11/5/93 |
| 178 | 10/28/93 | WATER | | MAINTEN | CLARK | 20208 | 12/8/93 |
| 179 | 10/28/93 | WATER | | MAINTEN | CLARK | 20208 | 12/2/93 |
| 180 | 10/28/93 | OIL 3" | | MAINTEN | CLARK | 20208 | 12/8/93 |
| 181 | 10/28/93 | 5GAL BTS | | HAZ PAD | CLARK | 20208 | 12/8/93 |
| 182 | 10/28/93 | EMPTY | | MAINTEN | | CWM 531 | 11/5/93 |
| 183 | 10/28/93 | TRASH | | MAINTEN | 20124 | 20208 | 12/8/93 |
| 184 | 10/28/93 | EMPTY | | MAINTEN | | CWM 531 | 11/5/93 |
| 185 | 10/28/93 | CITGARD 2" | | MAINTEN | CLARK | 20208 | 12/8/93 |
| 186 | 10/28/93 | UK 1/3 | | MAINTEN | CLARK | 20208 | 12/8/93 |
| 187 | 10/28/93 | EMPTY | | MAINTEN | | CWM 531 | 11/5/93 |
| 188 | 10/28/93 | EMPTY | | MAINTEN | | CWM 531 | 11/5/93 |
| 189 | 11/4/93 | EMPTY | | MAINTEN | | CWM 531 | 11/5/93 |
| 190 | 11/4/93 | UK 1/3 | | MAINTEN | CLARK | 20208 | 12/8/93 |
| 191 | 11/4/93 | OIL 1/3 | | FIRE AREA | CLARK | 20208 | 12/8/93 |
| 192 | 11/4/93 | EMPTY | | FIRE AREA | | CWM 531 | 11/5/93 |

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| 94 | 11/3/93 | FILTERS 1 | | HAZ PAD | 3008 | 20139 | 12/21/93 |
| 95 | 11/3/93 | FILTERS 1 | | HAZ PAD | 3008 | 20139 | 12/21/93 |
| 96 | 11/3/93 | FILTERS 1 | (WATER) | HAZ PAD | 3008 | 20227 | 12/21/93 |
| 97 | 11/3/93 | FILTERS 1 | | HAZ PAD | 3008 | 20139 | 12/21/93 |
| 98 | 11/3/93 | FILTERS 1 | | HAZ PAD | 3008 | 20139 | 12/21/93 |
| 99 | 11/3/93 | FILTERS 1 | | HAZ PAD | 3008 | 20139 | 12/21/93 |
| 100 | 11/3/93 | UK LIQUID | (RED) | MAINTEN | 20100 | 20125 | 4/21/94 |
| 101 | 11/3/93 | WATER 1 | | FLUID | CLARK | 20107 | 12/10/93 |
| 102 | 11/3/93 | SOLVENT | | FLUID | CLARK | 20107 | 12/10/93 |
| 103 | 11/3/93 | OIL 1 | | FLUID | CLARK | 20107 | 12/9/93 |
| 104 | 11/3/93 | OIL 1 | | FLUID | CLARK | 20107 | 12/9/93 |
| 105 | 11/3/93 | SPENT CAT | | COKER | 20109 | 20139 | 12/21/93 |
| 106 | 11/3/93 | SPENT CAT | | COKER | 20109 | 20139 | 12/21/93 |
| 107 | 11/3/93 | SPENT CAT | | COKER | 20109 | 20139 | 12/21/93 |
| 108 | 11/3/93 | EMPTY | | FLUID | | 531 | 11/1/93 |
| 109 | 11/3/93 | EMPTY | | FLUID | | 531 | 11/1/93 |
| 110 | 11/3/93 | UK SLUDGE | | COKER | CLARK | 20107 | 12/9/93 |
| 111 | 11/3/93 | SOIL | | FLUID | 2022 | 20227 | 1/12/94 |
| 112 | 11/3/93 | UK SLUDGE | | FLUID | 2022 | 20227 | 1/12/94 |
| 113 | 11/3/93 | OIL 1 | | MAINTEN | CLARK | 20107 | 12/9/93 |
| 114 | 11/3/93 | OIL 1/4 | | MAINTEN | CLARK | 20107 | 12/9/93 |
| 115 | 11/3/93 | SPENT CAT | | COKER | 20109 | 20139 | 12/21/93 |
| 116 | 11/3/93 | SPENT CAT | | COKER | 20109 | 20139 | 12/21/93 |
| 117 | 11/3/93 | OIL 1 | | COKER | CLARK | 20107 | 12/9/93 |
| 118 | 11/3/93 | TRASH 1 | | COKER | 20124 | 20208 | 12/1/93 |
| 119 | 11/3/93 | EMPTY | | FLUID | | 20107 | 12/10/93 |
| 120 | 11/3/93 | EMPTY | | FLUID | | 20107 | 12/10/93 |
| 121 | 11/3/93 | DRY–ALL | (CLEANUP) | REFORMER | 20152 | 20227 | 1/12/94 |
| 122 | 11/3/93 | UK SLUDGE | | COKER | CLARK | 20107 | 12/9/93 |
| 123 | 11/3/93 | UK SLUDGE | (SLIMY) | HAZ PAD | 20100 | 20125 | 4/21/94 |
| 124 | 11/3/93 | FILTERS | | HAZ PAD | 3008 | 20139 | 12/21/93 |
| 125 | 11/3/93 | FILTERS | | HAZ PAD | 3008 | 20139 | 12/21/93 |
| 126 | 11/3/93 | FILTERS | | HAZ PAD | 3008 | 20139 | 12/21/93 |
| 127 | 11/3/93 | FILTERS | | HAZ PAD | 3008 | 20139 | 12/21/93 |
| 128 | 11/3/93 | FILTERS | | HAZ PAD | 3008 | 20139 | 12/21/93 |
| 129 | 11/3/93 | TAR PALLET | | HAZ PAD | 20152 | 20227 | 2/24/94 |
| 130 | 11/3/93 | FILTERS | | HAZ PAD | 3008 | 20139 | 12/21/93 |
| 131 | 11/3/93 | FILTERS | | HAZ PAD | 3008 | 20139 | 12/21/93 |
| 132 | 11/3/93 | EMPTY | | REFORMER | | 20139 | 12/21/93 |
| 133 | 11/3/93 | SOLI CUT | | POND AREA | 20106 | 20208 | 12/1/93 |
| 134 | 11/3/93 | EMPTY | | REFORMER | | 531 | 11/10/93 |
| 135 | 11/3/93 | EMPTY | | REFORMER | | 531 | 11/10/93 |
| 136 | 11/3/93 | SOIL CUT | | POND AREA | 20106 | 20208 | 11/30/93 |
| 137 | 11/3/93 | SOIL CUT | | POND AREA | 20106 | 20208 | 11/30/93 |
| 138 | 11/3/93 | OIL | | MAINTEN | CLARK | 20107 | 12/9/93 |
| 139 | 11/3/93 | OIL | | MAINTEN | CLARK | 20107 | 12/9/93 |
| 140 | 11/3/93 | EMPTY | | REFORMER | | 531 | 11/4/93 |
| 141 | 11/3/93 | TRASH | | MAINTEN | | 531 | 11/4/93 |
| 142 | 11/3/93 | TRASH | | SCRAP | 20124 | 20208 | 12/1/93 |
| 143 | 11/3/93 | SPENT CAT | | REFORMER | 20109 | 20139 | 12/21/93 |

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|---|---|---|---|---|---|---|---|
| 45 | 11/3/93 | OIL 1 | | WASH PAD | CLARK | 20208 | 12/2/93 |
| 46 | 11/3/93 | OIL 1 | | FLUID | CLARK | 20107 | 12/9/93 |
| 47 | 11/3/93 | OIL 1 | | FLUID | CLARK | 20107 | 12/9/93 |
| 48 | 11/3/93 | OIL 1 | | FLUID | CLARK | 20107 | 12/9/93 |
| 49 | 11/3/93 | OIL 1 | | FLUID | CLARK | 20107 | 12/9/93 |
| 50 | 11/3/93 | OIL 1 | | FLUID | CLARK | 20107 | 12/9/93 |
| 51 | 11/3/93 | OIL 1 | | FLUID | CLARK | 20107 | 12/9/93 |
| 52 | 11/3/93 | OIL 1 | | FLUID | CLARK | 20107 | 12/9/93 |
| 53 | 11/3/93 | OIL 1 | | FLUID | CLARK | 20107 | 12/9/93 |
| 54 | 11/3/93 | OIL 1 | | FLUID | CLARK | 20107 | 12/9/93 |
| 55 | 11/3/93 | SOIL CUT 1 | | POND AREA | 15108 | 531 | 11/5/93 |
| 56 | 11/3/93 | SOIL CUT 1 | | POND AREA | 20106 | 20208 | 11/30/93 |
| 57 | 11/3/93 | TAR | | FLUID | 20152 | 20227 | 2/24/94 |
| 58 | 11/3/93 | TAR | | FLUID | 20152 | 20227 | 1/12/94 |
| 59 | 11/3/93 | WATER 1 | | POND AREA | CLARK | 20208 | 12/2/93 |
| 60 | 11/3/93 | WATER 1 | | POND AREA | CLARK | 20208 | 12/2/93 |
| 61 | 11/3/93 | SOIL CUT 1 | | POND AREA | 20106 | 20208 | 12/1/93 |
| 62 | 11/3/93 | SOIL CUT 1 | | POND AREA | 15108 | 531 | 11/30/93 |
| 63 | 11/3/93 | SOIL CUT 1 | | POND AREA | 20106 | 20208 | 12/2/93 |
| 64 | 11/3/93 | OILY ROCK | | MAINTEN | 20124 | 20208 | 12/1/93 |
| 65 | 11/3/93 | OIL SLUDGE | | MAINTEN | 20124 | 20208 | 12/1/93 |
| 66 | 11/3/93 | TRASH 1 | | MAINTEN | 20124 | 20208 | 12/1/93 |
| 67 | 11/3/93 | SLIMY | SLUDGE LIKE | ALKY | 20100 | 20125 | 4/21/94 |
| 68 | 11/3/93 | OIL SLUDGE | | FLARE | 20124 | 20208 | 12/1/93 |
| 69 | 11/3/93 | LIME | | HAZ PAD | 20208 | 20227 | 1/24/94 |
| 70 | 11/3/93 | ARCO G8 | | BIO–WASTE | CLARK | 20107 | 12/9/93 |
| 71 | 11/3/93 | ARCO AW68 | | BIO–WASTE | CLARK | 20107 | 12/9/93 |
| 72 | 11/3/93 | WATER 1 | | POND AREA | CLARK | 20208 | 12/2/93 |
| 73 | 11/3/93 | WATER 1 | | POND AREA | CLARK | 20208 | 12/8/93 |
| 74 | 11/3/93 | CONT ROCK | | BIO–WASTE | 20106 | 20208 | 12/2/93 |
| 75 | 11/3/93 | CONT ROCK | | BIO–WASTE | 20106 | 20208 | 12/2/93 |
| 76 | 11/3/93 | GREASE | | MAINTEN | 20100 | 20125 | 4/21/94 |
| 77 | 11/3/93 | UK SLUDGE | | REFORMER | 2022 | 20227 | 1/12/94 |
| 78 | 11/3/93 | OIL SLUDGE | | REFORMER | 2022 | 20227 | 1/12/94 |
| 79 | 11/3/93 | OILY SLUD | | REFORMER | 2022 | 20227 | 1/12/94 |
| 80 | 11/3/93 | OIL 1 | | REFORMER | CLARK | 20107 | 12/9/93 |
| 81 | 11/3/93 | WATER | | BOILER | CLARK | 20107 | 12/9/94 |
| 82 | 11/3/93 | WATER | | MAINTEN | API | 20227 | 2/22/94 |
| 83 | 11/3/93 | CONT ROCK | | BIO–WASTE | 20106 | 20208 | 12/2/93 |
| 84 | 11/3/93 | CONT ROCK | | BIO–WASTE | 20106 | 20208 | 12/2/93 |
| 85 | 11/3/93 | SOIL CUT 1 | | POND AREA | 20106 | 20208 | 12/2/93 |
| 86 | 11/3/93 | MTY/5GAL | | REFORMER | CLARK | 20107 | 12/9/93 |
| 87 | 11/3/93 | WATER | | REFORMER | CLARK | 20125 | 3/16/94 |
| 88 | 11/3/93 | TRASH & | LIQUID | HAZ PAD | 20100 | 20125 | 4/21/94 |
| 89 | 11/3/93 | GREASE | | HAZ PAD | 20100 | 20125 | 4/21/94 |
| 90 | 11/3/93 | LIME | | HAZ PAD | 20125 | 20227 | 1/24/94 |
| 91 | 11/3/93 | OIL 1 | | MAINTEN | CLARK | 20227 | 2/22/94 |
| 92 | 11/3/93 | TRASH 1 | | MAINTEN | 20124 | 20208 | 12/1/93 |
| 93 | 11/3/93 | TRASH 1 | | MAINTEN | 20124 | 20208 | 12/1/93 |

CLARK HAZARDOUS
DRUM STORAGE
FACILITY

| DRUM # | DATE IN | CONTENTS BY VOLUME | CLARK JOB/ACCT NO | INHOUSE GENERATOR | WASTE DISPOSED | DRUM DISPOSED | DATE DISPOSED |
|---|---|---|---|---|---|---|---|
| 1 | 11/1/93 | TRASH/1 | | BIO-WASTE | 20124 | 20208 | 12/1/93 |
| 2 | 11/1/93 | UK 1/2 | | WASH PAD | CLARK | 20208 | 12/10/93 |
| 3 | 11/1/93 | WATER 1/3 | | BIO-WASTE | CLARK | 20208 | 12/2/93 |
| 4 | 11/1/93 | TRASH 1 | | BIO-WASTE | 20124 | 20208 | 12/1/93 |
| 5 | 11/1/93 | TRASH 1 | | WASH PAD | 20124 | 20208 | 12/1/93 |
| 6 | 11/1/93 | TRASH 1 | | WASH PAD | 20124 | 20208 | 12/1/93 |
| 7 | 11/1/93 | TRASH 1 | | WASH PAD | 20124 | 20208 | 12/1/93 |
| 8 | 11/1/93 | SOIL CUT 1 | | POND AREA | 20106 | 20208 | 11/30/93 |
| 9 | 11/1/93 | WATER 1 | | POND AREA | CLARK | 20208 | 12/3/93 |
| 10 | 11/1/93 | WATER 1 | | POND AREA | CLARK | 20208 | 12/3/93 |
| 11 | 11/1/93 | TRASH 1 | | FLARE | CLARK | 20208 | 12/3/93 |
| 12 | 11/1/93 | TRASH 1 | | FLARE | 20124 | 20208 | 12/1/93 |
| 13 | 11/1/93 | WATER 1 | | BIO-WASTE | 20124 | 20208 | 12/3/93 |
| 14 | 11/1/93 | TRASH 1 | | COKER | 20124 | 20208 | 12/1/93 |
| 15 | 11/1/93 | TRASH 1 | | BIO-WASTE | 20124 | 20107 | 12/10/93 |
| 16 | 11/1/93 | SOIL CUT 1 | | POND AREA | 15108 | 531 | 11/5/93 |
| 17 | 11/1/93 | SOIL CUT 1 | | POND AREA | 15108 | 531 | 11/5/93 |
| 18 | 11/1/93 | SOIL CUT 1 | | POND AREA | 15108 | 531 | 11/5/93 |
| 19 | 11/1/93 | SOIL CUT 1 | | POND AREA | 15108 | 531 | 11/5/93 |
| 20 | 11/1/93 | SOIL CUT 1 | | POND AREA | 15108 | 531 | 11/5/93 |
| 21 | 11/1/93 | SOIL CUT 1 | | POND AREA | 15108 | 531 | 11/5/93 |
| 22 | 11/1/93 | SOIL CUT 1 | | POND AREA | 15108 | 531 | 11/5/93 |
| 23 | 11/1/93 | WATER | | BIO-WASTE | CLARK | 20227 | 2/28/94 |
| 24 | 11/1/93 | SOIL CUT 1 | | POND AREA | 15108 | 531 | 11/5/93 |
| 25 | 11/1/93 | TRASH 1 | | FLARE | 20124 | 20208 | 12/3/93 |
| 26 | 11/1/93 | SLUDGE 1/2 | | FLUID | 2022 | 20227 | 1/12/94 |
| 27 | 11/1/93 | SOIL CUT 1 | | POND AREA | 15108 | 531 | 11/5/93 |
| 28 | 11/1/93 | SOIL CUT 1 | | POND AREA | 15108 | 531 | 11/5/93 |
| 29 | 11/3/93 | SOIL CUT 1 | | POND AREA | 15108 | 531 | 11/5/93 |
| 30 | 11/3/93 | WATER 1 | | POND AREA | CLARK | 20208 | 12/2/93 |
| 31 | 11/3/93 | WATER 1 | | POND AREA | CLARK | 20208 | 12/2/93 |
| 32 | 11/3/93 | WATER 1 | | POND AREA | CLARK | 20208 | 12/2/93 |
| 33 | 11/3/93 | SOIL CUT 1 | | POND AREA | 15108 | 531 | 12/2/93 |
| 34 | 11/3/93 | SOIL CUT 1 | | POND AREA | 20106 | 20208 | 12/2/93 |
| 35 | 11/3/93 | SOIL CUT 1 | | POND AREA | 20106 | 20208 | 12/2/93 |
| 36 | 11/3/93 | SOIL CUT 1 | | POND AREA | 20106 | 20208 | 12/2/93 |
| 37 | 11/3/93 | WATER 1 | | POND AREA | CLARK | 20107 | 12/10/93 |
| 38 | 11/3/93 | SOIL CUT 1 | | POND AREA | 20106 | 20208 | 12/2/93 |
| 39 | 11/3/93 | TAR | | FLARE | 20152 | RECLAIM | 2/24/94 |
| 40 | 11/3/93 | TAR | | FLARE | 20152 | RECLAIM | 2/24/94 |
| 41 | 11/3/93 | SOIL CUT 1 | | POND AREA | 15108 | 531 | 11/5/93 |
| 42 | 11/3/93 | WATER 1 | | POND AREA | CLARK | 20208 | 12/2/93 |
| 43 | 11/3/93 | WATER 1 | | POND AREA | CLARK | 20208 | 12/2/93 |
| 44 | 11/3/93 | WATER 1 | | POND AREA | CLARK | 20208 | 12/2/93 |

[Loc: ILD 041 889 023 119 05000 02
CLARK OIL & REFINING CO
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P.O. BOX 7
HARTFORD IL
62048

istn
his 1

# 'LLINOIS Environmental Protection Agency
# 1994 Hazardous Waste Report
# Form IC — Identification and Certification

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OFFICE OF RCRA
WASTE MANAGEMENT DIVISION
EPA, REGION V

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ebel. If you need additional forms for other locations, call IEPA.

## SEC. 1 - GENERATOR STATUS

A. 1 (30) RCRA Generator Status *(Enter one code)*

1 = LQG
2 = SQG
3 = CESQG
} Skip to Box C
4 = Nongenerator (Continue to Box B)

B. Reason for not generating *(Check all that apply)*

31 ___ Never generated
32 ___ Out of business
33 ___ Only excluded or delisted waste generated
34 ___ Only non-hazardous waste generated
35 ___ Periodic generator, none in reporting year
36 ___ Waste minimization activity
37 ___ Other *(Specify in comments box)*

C. 2 (38) Status Time Period: 1 = Expected to be the same next year and following years. 2 = Expected to change next year.

## SECTION II. ENTER THE SIC CODE(S) FOR THIS LOCATION.

2 9 1 1 (39) ___ ___ ___ ___ (43) ___ ___ ___ ___ (47) ___ ___ ___ ___ (51)

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## SECTION III. ON-SITE WASTE MANAGEMENT STATUS *(enter one code for each question)*

A. 55 1 RCRA regulated (permitted or interim status) storage
B. 56 1 RCRA permitted or interim status treatment, disposal, or recycling
C. 57 1 Treatment, disposal, or recycling exempt from RCRA permit requirements.

## SECTION IV. WASTE MINIMIZATION ACTIVITY DURING THIS REPORTING YEAR *(Enter Y [Yes] or N [No] for questions A-E)* *(ONLY LQG'S SHOULD COMPLETE SECTION IV)*

A. 58 Y Did this site begin or expand a source reduction activity this year? If "no" refer to page 48 and list factors in D first row. If "yes" complete Form GM Section IV.

B. 59 N Did this site begin or expand a recycling activity this year? If "no" refer to page 48 and list factors in D first row. If "yes" complete Form GM Section IV.

C. 60 Y Did this site systematically investigate opportunities for source reduction or recycling?

D. Did any of the factors listed on page 48 delay or limit this site's ability to initiate new or additional source reduction or on-site or off-site recycling activities this year; if yes, refer to page 48 and enter Y on the appropriate row below.

SOURCE REDUCTION LIMITING FACTORS
a. ___ (61) b. ___ (62) c. ___ (63) d. ___ (64) e. ___ (65) f. ___ (66) g. ___ (67) h. ___ (68) i. Y (69) j. ___ (70)

RECYCLING LIMITING FACTORS
a. ___ (71) b. ___ (72) c. ___ (73) d. ___ (74) e. ___ (75) f. Y (76) g. Y (77) h. ___ (78) i. ___ (79) j. ___ (80) k. ___ (81) l. ___ (82) m. ___ (83) n. ___ (84) o. ___ (85)

E. Y (86) Does this site have in place an organized program to implement recycling and/or source reduction activities? If "yes", refer to page 49 and mark all activities which describe your program on spaces 87 through 99.

a. ___ (87) b. ___ (88) c. ___ (89) d. ___ (90) e. Y (91) f. ___ (92) g. ___ (93) h. ___ (94) i. ___ (95) j. ___ (96) k. ___ (97) l. Y (98) m. ___ (99)

**COMMENTS:** ___ (100) Enter Y (Yes) if you have comments regarding this page and attach extra sheet.

**SEC. V.** This Agency is authorized to require this information under 415 ILCA 5/4 and 21 (f)(2). Disclosure of this information in required. Failure to do so may result in a civil penalty up to $25,999 for each day the failure continues, a fine up to $1,000,000.00 and imprisonment up to 5 years. This form has been approved by the Forms Management Center.

**ERTIFICATION** I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. Please print: Last Name MODARRES First Name MASSOOD B. Title ENVIRO. ENGR.

C. Signature M. Modarres D. Date of signature 2-3-95

[Location label with ID#]
ILD 041 889 023 119 35000 02
CLARK OIL & REFINING CO
HAWTHORNE ST
P.O. BOX 7 IL
HARTFORD 62048
...str

# LLINOIS Environmental Protection Agency
## 994 Hazardous Waste Report
## 'orm GM -- Waste Generation and Management

### Sec. I WASTE DESCRIPTION

A. Waste Description: SODIUM HYDROXIDE

B. EPA Hazardous Waste Code D002 (30) ___ (34) ___ (38) ___ (42) ___ (46)

C. SIC code 2911 (50)

D. Origin Code 1 (54) System type M (55) ___

E. Source code A 58 (59) A ___ (62) A ___ (65)

F. Point of measurement 1 (68)

G. Waste form code B 001 (69)

H. Radioactive mixed 2 (73)

I. TRI constituent 8 (74)

J. CAS numbers: 1. ___ (75) 2. ___ (83) 3. ___ (91)
4. ___ (99) 5. ___ (107)

### Sec. II QUANTITY GENERATED AND MANAGED ON-SITE

A. UOM 1 (115) Density 10.00 (116) lbs/gal *(Same unit and density must be used for all quantities on this page)*

Quantity generated in : B Previous reporting year (120) ___ . C. Current reporting year (130) 10.0

D. Did this location do any of the following to this waste (at this location): manage in exempt or regulated treatment, recycling, or disposal process? N (140) Y= Yes (Continue to System 1) N= No (Skip to Sec. III)

On-Site System 1: System Type M (141) ___ Quantity managed on-site this year (145) ___

On-Site System 2: System Type M (155) ___ Quantity managed on-site this year (159) ___

### Sec. III OFF-SITE SHIPMENT

A. Was any of this waste shipped off site this reporting year? Y (169) Y= Yes (Continue to Box B) N= No (Skip to Sec. IV)

Site 1: Name and address of facility:
TRADE WASTE INCINERATION
#7 MOBILE AVE. SAUGET, IL 62201

B. U.S. EPA ID No. of facility waste was shipped to: (170) ILD098642424

C. System type shipped to M (182) 041 D. Off-site availability code 1 (188)

E. Total quantity shipped in this reporting year: (187) 10.0

Site 2: Name and address of facility:

B. U.S. EPA ID No. of facility waste was shipped to: (197) ___

C. System type shipped to M (209) ___ D. Off-site availability code (213) ___

E. Total quantity shipped in this reporting year: (214) ___

### Sec. IV NEW WASTE MINIMIZATION ACTIVITIES

A. Did new activities in this year result in minimization of this waste? N (224) Y= Yes (Cont. to Box B) N= No (Cont. to Sec. V)

B. Activity W (225) ___ W (228) ___ W (231) ___ W (234) ___ C. Other effects (Y=Yes, N=No) (237) ___

D. Quantity recycled in reporting year due to new activities (238) ___

E. Activity/production index (248) ___ F. Reporting year Source reduction quantity (251) ___

### Sec. V REGULATED STORAGE

A. Did this site store RCRA wastes 90 days or more and then ship it off-site (to site shown in Section III)? (Y=Yes, N=No) N (261)

B. Did this site store RCRA wastes on-site for more than 90 days but waste is in storage at year end: (Y= Yes, N= No) N (262)

Quantity stored at year end and for 90 days or more that was generated this reporting year: (283) ___

Quantity stored at year end that was generated prior to this reporting year: (273) ___

COMMENTS: ___ (283) Enter Y (Yes) if you have comments regarding this page and attach extra sheet.

[Location label with ID#]
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HARTFORD 62048
.istr

# LLINOIS Environmental Protection Agency
## 994 Hazardous Waste Report
## 'orm GM -- Waste Generation and Management

### Sec. I WASTE DESCRIPTION

A. Waste Description: POLYAMIDE AMINE

B. EPA Hazardous Waste Code D002 (30) ___ (34) ___ (38) ___ (42) ___ (46) ___

C. SIC code 2911

D. Origin Code 1 (50) System type M (54) ___ E. Source code A (59) 52 A (62) ___ A (65) ___

F. Point of measurement 1 (68) G. Waste form code B (69) 001

H. Radioactive mixed 2 (73) I. TRI constituent 8 (74)

J. CAS numbers: 1. (75) ___-___-___ 2. (83) ___-___-___ 3. (91) ___-___-___
4. (99) ___-___-___ 5. (107) ___-___-___

### Sec. II QUANTITY GENERATED AND MANAGED ON-SITE

A. UOM 1 (115) Density 9.5 (116) lbs/gal *(Same unit and density must be used for all quantities on this page)*

Quantity generated in : B Previous reporting year (120) 0.0 C. Current reporting year (130) 14.0

D. Did this location do any of the following to this waste (at this location): manage in exempt or regulated treatment, recycling, or disposal process? N (140) Y= Yes (Continue to System 1) N= No (Skip to Sec. III)

On-Site System 1: System Type M (141) ___ Quantity managed on-site this year (145) ___.___

On-Site System 2: System Type M (155) ___ Quantity managed on-site this year (159) ___.___

### Sec. III OFF-SITE SHIPMENT

A. Was any of this waste shipped off site this reporting year? ___ (169) Y= Yes (Continue to Box B) N= No (Skip to Sec. IV)

**Site 1:** Name and address of facility:
TRADE WASTE INCINERATION
#7 MOBILE AVE. SAUGET, IL 62201

B. U.S. EPA ID No. of facility waste was shipped to: (170) ILD 098 642424

C. System type shipped to M (182) 041 D. Off-site availability code 1 (186)

E. Total quantity shipped in this reporting year: (187) 14.0

**Site 2:** Name and address of facility:

B. U.S. EPA ID No. of facility waste was shipped to: (197) ___

C. System type shipped to M (209) ___ D. Off-site availability code ___ (213)

E. Total quantity shipped in this reporting year: (214) ___.___

### Sec. IV NEW WASTE MINIMIZATION ACTIVITIES

A. Did new activities in this year result in minimization of this waste? N (224) Y= Yes (Cont. to Box B) N= No (Cont. to Sec. V)

B. Activity W (225) ___ W (228) ___ W (231) ___ W (234) ___ C. Other effects (Y=Yes, N=No) ___ (237)

D. Quantity recycled in reporting year due to new activities (238) ___.___

E. Activity/production index (248) ___.___ F. Reporting year Source reduction quantity (251) ___.___

### Sec. V REGULATED STORAGE

A. Did this site store RCRA wastes 90 days or more and then ship it off-site (to site shown in Section III)? (Y=Yes, N=No) N (261)

B. Did this site store RCRA wastes on-site for more than 90 days but waste is in storage at year end: (Y= Yes, N= No) N (262)

Quantity stored at year end and for 90 days or more that was generated this reporting year: (263) ___.___

Quantity stored at year end that was generated prior to this reporting year: (273) ___.___

COMMENTS: ___ (283) Enter Y (Yes) if you have comments regarding this page and attach extra sheet.

[Location label with ID#]
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HARTFORD 62048
nstr

# LLINOIS Environmental Protection Agency
## 994 Hazardous Waste Report
## 'orm GM -- Waste Generation and Management

### Sec. I WASTE DESCRIPTION

A. Waste Description: ETHYLE MERCAPTAN

B. EPA Hazardous Waste Code D001 (30) ___ (34) ___ (38) ___ (42) ___ (46)

C. SIC code 2911 (50)

D. Origin Code 1 (54) System type M (55) ___

E. Source code A 57 (59) A ___ (62) A ___ (65)

F. Point of measurement 1 (68)

G. Waste form code B 001 (69)

H. Radioactive mixed 2 (73)

I. TRI constituent 8 (74)

J. CAS numbers: 1. ___ (75) 2. ___ (83) 3. ___ (91) 4. ___ (99) 5. ___ (107)

### Sec. II QUANTITY GENERATED AND MANAGED ON-SITE

A. UOM 1 (115) Density 8.50 (116) lbs/gal *(Same unit and density must be used for all quantities on this page)*

Quantity generated in : B Previous reporting year (120) 0.0 C. Current reporting year (130) 10.0

D. Did this location do any of the following to this waste (at this location): manage in exempt or regulated treatment, recycling, or disposal process? N (140) Y= Yes (Continue to System 1) N= No (Skip to Sec. III)

On-Site System 1: System Type M (141) ___ Quantity managed on-site this year (145) ___

On-Site System 2: System Type M (155) ___ Quantity managed on-site this year (159) ___

### Sec. III OFF-SITE SHIPMENT

A. Was any of this waste shipped off site this reporting year? Y (169) Y= Yes (Continue to Box B) N= No (Skip to Sec. IV)

**Site 1:** Name and address of facility:
TRADE WASTE INCINERATION
#7 MOBILE AVE. SAUGET, IL 62201

B. U.S. EPA ID No. of facility waste was shipped to: (170) ILD 098642424

C. System type shipped to M (182) 041 D. Off-site availability code 1 (186)

E. Total quantity shipped in this reporting year: (187) 10.0

**Site 2:** Name and address of facility:

B. U.S. EPA ID No. of facility waste was shipped to: (197) ___

C. System type shipped to M (209) ___ D. Off-site availability code (213) ___

E. Total quantity shipped in this reporting year: (214) ___

### Sec. IV NEW WASTE MINIMIZATION ACTIVITIES

A. Did new activities in this year result in minimization of this waste? N (224) Y= Yes (Cont. to Box B) N= No (Cont. to Sec. V)

B. Activity W (225) ___ W (228) ___ W (231) ___ W (234) ___ C. Other effects (Y=Yes, N=No) (237) ___

D. Quantity recycled in reporting year due to new activities (238) ___

E. Activity/production index (248) ___ F. Reporting year Source reduction quantity (251) ___

### Sec. V REGULATED STORAGE

A. Did this site store RCRA wastes 90 days or more and then ship it off-site (to site shown in Section III)? (Y=Yes, N=No) N (261)

B. Did this site store RCRA wastes on-site for more than 90 days but waste is in storage at year end: (Y= Yes, N= No) N (262)

Quantity stored at year end and for 90 days or more that was generated this reporting year: (283) ___

Quantity stored at year end that was generated prior to this reporting year: (273) ___

**COMMENTS:** ___ (283) Enter Y (Yes) if you have comments regarding this page and attach extra sheet.

[Location label with ID#]
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HAWTHORNE ST
P.O. BOX 7
HARTFORD IL
62048

# LLINOIS Environmental Protection Agency
## 994 Hazardous Waste Report
## 'orm GM -- Waste Generation and Management

### Sec. I WASTE DESCRIPTION

A. Waste Description: REFORMER UNIT CHARGE FILTERS
B. EPA Hazardous Waste Code D018 (30) ___ (34) ___ (38) ___ (42) ___ (46) ___
C. SIC code 2911 (50)
D. Origin Code 1 (54) System type M (55) ___
E. Source code A 32 (59) A ___ (62) A ___ (65)
F. Point of measurement 1 (68)
G. Waste form code B 310 (69)
H. Radioactive mixed 2 (73)
I. TRI constituent 3 (74)
J. CAS numbers: 1. 00071-43-2 (75) 2. ___ (83) 3. ___ (91)
4. ___ (99) 5. ___ (107)

### Sec. II QUANTITY GENERATED AND MANAGED ON-SITE

A. UOM 1 (115) Density 10.0 (116) lbs/gal *(Same unit and density must be used for all quantities on this page)*
Quantity generated in : B Previous reporting year (120) 0.0. C. Current reporting year (130) 2340.0
D. Did this location do any of the following to this waste (at this location): manage in exempt or regulated treatment, recycling, or disposal process? N (140) Y= Yes (Continue to System 1) N= No (Skip to Sec. III)
On-Site System 1: System Type M (141) ___ Quantity managed on-site this year (145) ___
On-Site System 2: System Type M (155) ___ Quantity managed on-site this year (159) ___

### Sec. III OFF-SITE SHIPMENT

A. Was any of this waste shipped off site this reporting year? Y (169) Y= Yes (Continue to Box B) N= No (Skip to Sec. IV)
**Site 1:** Name and address of facility:
TRADE WASTE INCINERATION
#7 MOBILE AVE. SAUGET, IL 62201
B. U.S. EPA ID No. of facility waste was shipped to: ILD098642424 (170)
C. System type shipped to M 043 (182) D. Off-site availability code 1 (186)
E. Total quantity shipped in this reporting year: 2340.0 (187)

**Site 2:** Name and address of facility:

B. U.S. EPA ID No. of facility waste was shipped to: ___ (197)
C. System type shipped to M ___ (209) D. Off-site availability code ___ (213)
E. Total quantity shipped in this reporting year: ___ (214)

### Sec. IV NEW WASTE MINIMIZATION ACTIVITIES

A. Did new activities in this year result in minimization of this waste? N (224) Y= Yes (Cont. to Box B) N= No (Cont. to Sec. V)
B. Activity W ___ (225) W ___ (228) W ___ (231) W ___ (234) C. Other effects (Y=Yes, N=No) ___ (237)
D. Quantity recycled in reporting year due to new activities ___ (238)
E. Activity/production index ___ (248) F. Reporting year Source reduction quantity ___ (251)

### Sec. V REGULATED STORAGE

A. Did this site store RCRA wastes 90 days or more and then ship it off-site (to site shown in Section III)? (Y=Yes, N=No) N (261)
B. Did this site store RCRA wastes on-site for more than 90 days but waste is in storage at year end: (Y= Yes, N= No) N (262)
Quantity stored at year end and for 90 days or more that was generated this reporting year: ___ (263)
Quantity stored at year end that was generated prior to this reporting year: ___ (273)

COMMENTS: ___ (283) Enter Y (Yes) if you have comments regarding this page and attach extra sheet.

[Location label with ID#]
ILD 041 839 023 119 05000 02
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HARTFORD IL
62048
Distr

# LLINOIS Environmental Protection Agency
## 994 Hazardous Waste Report
## 'orm GM -- Waste Generation and Management

### Sec. I WASTE DESCRIPTION

A. Waste Description: EXCHANGER BUNDLE CLEANING SLUDGE
B. EPA Hazardous Waste Code K050 (30) ___ (34) ___ (38) ___ (42) ___ (46)
C. SIC code 2911 (50)
D. Origin Code 1 (54) System type M (55) ___
E. Source code A 09 (59) A ___ (62) A ___ (65)
F. Point of measurement 1 (68)
G. Waste form code B 603 (69)
H. Radioactive mixed 2 (73)
I. TRI constituent 3 (74)
J. CAS numbers: 1. 00021-43-2 (75) 2. ___-___-___ (83) 3. ___-___-___ (91)
4. ___-___-___ (99) 5. ___-___-___ (107)

### Sec. II QUANTITY GENERATED AND MANAGED ON-SITE

A. UOM 1 (115) Density 9.00 (116) lbs/gal *(Same unit and density must be used for all quantities on this page)*
Quantity generated in : B Previous reporting year (120) 0.0. C. Current reporting year (130) 2016.0
D. Did this location do any of the following to this waste (at this location): manage in exempt or regulated treatment, recycling, or disposal process? N (140) Y= Yes (Continue to System 1) N= No (Skip to Sec. III)
On-Site System 1: System Type M (141) ___ Quantity managed on-site this year (145) ___.___
On-Site System 2: System Type M (155) ___ Quantity managed on-site this year (159) ___.___

### Sec. III OFF-SITE SHIPMENT

A. Was any of this waste shipped off site this reporting year? Y (169) Y= Yes (Continue to Box B) N= No (Skip to Sec. IV)
Site 1: Name and address of facility:
TRADE WASTE INCINERATION
#7 MOBILE AVE. SAUGET, IL 62201
B. U.S. EPA ID No. of facility waste was shipped to: (170) ILD098642424
C. System type shipped to M (182) 043 D. Off-site availability code 1 (186)
E. Total quantity shipped in this reporting year: (187) 2016.0
Site 2: Name and address of facility:

B. U.S. EPA ID No. of facility waste was shipped to: (197) ___
C. System type shipped to M (209) ___ D. Off-site availability code (213) ___
E. Total quantity shipped in this reporting year: (214) ___.___

### Sec. IV NEW WASTE MINIMIZATION ACTIVITIES

A. Did new activities in this year result in minimization of this waste? N (224) Y= Yes (Cont. to Box B) N= No (Cont. to Sec. V)
B. Activity W (225) ___ W (228) ___ W (231) ___ W (234) ___ C. Other effects (Y=Yes, N=No) (237) ___
D. Quantity recycled in reporting year due to new activities (238) ___.___
E. Activity/production index (248) ___.___ F. Reporting year Source reduction quantity (251) ___.___

### Sec. V REGULATED STORAGE

A. Did this site store RCRA wastes 90 days or more and then ship it off-site (to site shown in Section III)? (Y=Yes, N=No) N (261)
B. Did this site store RCRA wastes on-site for more than 90 days but waste is in storage at year end: (Y= Yes, N= No) N (262)
Quantity stored at year end and for 90 days or more that was generated this reporting year: (263) ___.___
Quantity stored at year end that was generated prior to this reporting year: (273) ___.___

COMMENTS: ___ (283) Enter Y (Yes) if you have comments regarding this page and attach extra sheet.

[Location label with ID#] ILD 041 533 223 119 15000 02
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# LLINOIS Environmental Protection Agency
## 994 Hazardous Waste Report
## 'orm GM -- Waste Generation and Management

### Sec. I WASTE DESCRIPTION

A. Waste Description: SLUDGE FROM API WATER TREATMENT PLANT

B. EPA Hazardous Waste Code (30) K051 (34) ___ (38) ___ (42) ___ (46) ___

C. SIC code (50) 2911

D. Origin Code (54) 1 System type (55) M___ E. Source code (59) A 75 (62) A___ (65) A___

F. Point of measurement (68) ~~X~~ G. Waste form code (69) B 603

H. Radioactive mixed (73) 2 I. TRI constituent (74) 8

J. CAS numbers: 1. (75) ___-___-___ 2. (83) ___-___-___ 3. (91) ___-___-___
4. (99) ___-___-___ 5. (107) ___-___-___

### Sec. II QUANTITY GENERATED AND MANAGED ON-SITE

A. UOM (115) 2 Density (118) 9.00 lbs/gal *(Same unit and density must be used for all quantities on this page)*

Quantity generated in : B Previous reporting year (120) 44.0 C. Current reporting year (130) 1065.0

D. Did this location do any of the following to this waste (at this location): manage in exempt or regulated treatment, recycling, or disposal process? (140) N Y= Yes (Continue to System 1) N= No (Skip to Sec. III)

On-Site System 1: System Type (141) M___ Quantity managed on-site this year (145) ___.___

On-Site System 2: System Type (155) M___ Quantity managed on-site this year (159) ___.___

### Sec. III OFF-SITE SHIPMENT

A. Was any of this waste shipped off site this reporting year? (169) ___ Y= Yes (Continue to Box B) N= No (Skip to Sec. IV)

Site 1: Name and address of facility:
TRADE WASTE INCINERATION
#7 MOBILE AVE. SAUGET, IL 62201

B. U.S. EPA ID No. of facility waste was shipped to: (170) ILD 098642424

C. System type shipped to (182) M 043 D. Off-site availability code (186) ___

E. Total quantity shipped in this reporting year: (187) 1065.0

Site 2: Name and address of facility:

B. U.S. EPA ID No. of facility waste was shipped to: (197) ___

C. System type shipped to (209) M___ D. Off-site availability code (213) ___

E. Total quantity shipped in this reporting year: (214) ___.___

### Sec. IV NEW WASTE MINIMIZATION ACTIVITIES

A. Did new activities in this year result in minimization of this waste? (224) Y Y= Yes (Cont. to Box B) N= No (Cont. to Sec. V)

B. Activity (225) W 12 (228) W 24 (231) W 36 (234) W 60 C. Other effects (Y=Yes, N=No) (237) ___

D. Quantity recycled in reporting year due to new activities (238) ___.___

E. Activity/production index (248) ___.___ F. Reporting year Source reduction quantity (251) ___.___

### Sec. V REGULATED STORAGE

A. Did this site store RCRA wastes 90 days or more and then ship it off-site (to site shown in Section III)? (Y=Yes, N=No) (261) N

B. Did this site store RCRA wastes on-site for more than 90 days but waste is in storage at year end: (Y= Yes, N= No) (262) N

Quantity stored at year end and for 90 days or more that was generated this reporting year: (263) ___.___

Quantity stored at year end that was generated prior to this reporting year: (273) ___.___

COMMENTS: (283) ___ Enter Y (Yes) if you have comments regarding this page and attach extra sheet.

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# LLINOIS Environmental Protection Agency
## 994 Hazardous Waste Report
## 'orm GM -- Waste Generation and Management

### Sec. I WASTE DESCRIPTION

A. Waste Description: MEK

B. EPA Hazardous Waste Code F005 (30) ___ (34) ___ (38) ___ (42) ___ (46) ___

C. SIC code 2911 (50)

D. Origin Code 1 (54) System type M (55) ___

E. Source code A 09 (59) A ___ (62) A ___ (65)

F. Point of measurement 1 (68)

G. Waste form code B 021 (69)

H. Radioactive mixed 2 (73)

I. TRI constituent 8 (74)

J. CAS numbers: 1. ___ (75) 2. ___ (83) 3. ___ (91) 4. ___ (99) 5. ___ (107)

### Sec. II QUANTITY GENERATED AND MANAGED ON-SITE

A. UOM 1 (115) Density 8.00 (116) lbs/gal *(Same unit and density must be used for all quantities on this page)*

Quantity generated in : B Previous reporting year (120) 0.0 C. Current reporting year (130) 5.0

D. Did this location do any of the following to this waste (at this location): manage in exempt or regulated treatment, recycling, or disposal process? N (140) Y= Yes (Continue to System 1) N= No (Skip to Sec. III)

On-Site System 1: System Type M (141) ___ Quantity managed on-site this year (145) ___

On-Site System 2: System Type M (155) ___ Quantity managed on-site this year (159) ___

### Sec. III OFF-SITE SHIPMENT

A. Was any of this waste shipped off site this reporting year? Y (169) Y= Yes (Continue to Box B) N= No (Skip to Sec. IV)

**Site 1:** Name and address of facility:

TRADE WASTE INCINERATION
#7 MOBILE AVE. SAUGET, IL 62201

B. U.S. EPA ID No. of facility waste was shipped to: ILD 098642424 (170)

C. System type shipped to M 041 (182) D. Off-site availability code 1 (186)

E. Total quantity shipped in this reporting year: (187) 5.0

**Site 2:** Name and address of facility:

B. U.S. EPA ID No. of facility waste was shipped to: (197) ___

C. System type shipped to M (209) ___ D. Off-site availability code (213) ___

E. Total quantity shipped in this reporting year: (214) ___

### Sec. IV NEW WASTE MINIMIZATION ACTIVITIES

A. Did new activities in this year result in minimization of this waste? N (224) Y= Yes (Cont. to Box B) N= No (Cont. to Sec. V)

B. Activity W (225) ___ W (228) ___ W (231) ___ W (234) ___ C. Other effects (Y=Yes, N=No) (237)

D. Quantity recycled in reporting year due to new activities (238) ___

E. Activity/production index (248) ___ F. Reporting year Source reduction quantity (251) ___

### Sec. V REGULATED STORAGE

A. Did this site store RCRA wastes 90 days or more and then ship it off-site (to site shown in Section III)? (Y=Yes, N=No) N (261)

B. Did this site store RCRA wastes on-site for more than 90 days but waste is in storage at year end: (Y= Yes, N= No) N (262)

Quantity stored at year end and for 90 days or more that was generated this reporting year: (263) ___

Quantity stored at year end that was generated prior to this reporting year: (273) ___

COMMENTS: ___ (283) Enter Y (Yes) if you have comments regarding this page and attach extra sheet.

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# LLINOIS Environmental Protection Agency
## 994 Hazardous Waste Report
## 'orm GM -- Waste Generation and Management

### Sec. I WASTE DESCRIPTION

A. Waste Description: FCC MEROX REACTOR MEDIA

B. EPA Hazardous Waste Code D018 (30) ___ (34) ___ (38) ___ (42) ___ (46) ___

C. SIC code 2911 (50)

D. Origin Code 1 (54) System type M (55) ___

E. Source code A 09 (59) A ___ (62) A ___ (65)

F. Point of measurement 1 (68)

G. Waste form code B 404 (69)

H. Radioactive mixed 2 (73)

I. TRI constituent 8 (74)

J. CAS numbers: 1. ___ (75) 2. ___ (83) 3. ___ (91)
4. ___ (99) 5. ___ (107)

### Sec. II QUANTITY GENERATED AND MANAGED ON-SITE

A. UOM 2 (115) Density 10.00 (116) lbs/gal *(Same unit and density must be used for all quantities on this page)*

Quantity generated in : B Previous reporting year (120) 0.0 C. Current reporting year (130) 120.0

D. Did this location do any of the following to this waste (at this location): manage in exempt or regulated treatment, recycling, or disposal process? N (140) Y= Yes (Continue to System 1) N= No (Skip to Sec. III)

On-Site System 1: System Type M (141) ___ Quantity managed on-site this year (145) ___

On-Site System 2: System Type M (155) ___ Quantity managed on-site this year (159) ___

### Sec. III OFF-SITE SHIPMENT

A. Was any of this waste shipped off site this reporting year? Y (169) Y= Yes (Continue to Box B) N= No (Skip to Sec. IV)

**Site 1:** Name and address of facility:
ADAMS CENTER LANDFILL
4636 ADAM CENTER Rd. FORT WAYNE, IND. 66806

B. U.S. EPA ID No. of facility waste was shipped to: (170) IND078911146

C. System type shipped to M (182) 132 D. Off-site availability code 1 (186)

E. Total quantity shipped in this reporting year: (187) 120.0

**Site 2:** Name and address of facility:

B. U.S. EPA ID No. of facility waste was shipped to: (197) ___

C. System type shipped to M (209) ___ D. Off-site availability code (213) ___

E. Total quantity shipped in this reporting year: (214) ___

### Sec. IV NEW WASTE MINIMIZATION ACTIVITIES

A. Did new activities in this year result in minimization of this waste? N (224) Y= Yes (Cont. to Box B) N= No (Cont. to Sec. V)

B. Activity W (225) ___ W (228) ___ W (231) ___ W (234) ___ C. Other effects (Y=Yes, N=No) (237) ___

D. Quantity recycled in reporting year due to new activities (238) ___

E. Activity/production index (248) ___ F. Reporting year Source reduction quantity (251) ___

### Sec. V REGULATED STORAGE

A. Did this site store RCRA wastes 90 days or more and then ship it off-site (to site shown in Section III)? (Y=Yes, N=No) N (261)

B. Did this site store RCRA wastes on-site for more than 90 days but waste is in storage at year end: (Y= Yes, N= No) N (262)

Quantity stored at year end and for 90 days or more that was generated this reporting year: (263) ___

Quantity stored at year end that was generated prior to this reporting year: (273) ___

**COMMENTS:** ___ (283) Enter Y (Yes) if you have comments regarding this page and attach extra sheet.

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# LLINOIS Environmental Protection Agency
## 994 Hazardous Waste Report
## 'orm GM -- Waste Generation and Management

### Sec. I WASTE DESCRIPTION

A. Waste Description: RED DYE SPILL CLEAN-UP

B. EPA Hazardous Waste Code 0239 (30) ___ (34) ___ (38) ___ (42) ___ (46) ___

C. SIC code 2911

D. Origin Code 1 (54) System type M (55) ___

E. Source code A 19 (59) A ___ (62) A ___ (65)

F. Point of measurement 1 (68)

G. Waste form code B 501 (69)

H. Radioactive mixed 2 (73)

I. TRI constituent 8 (74)

J. CAS numbers: 1. ___ (75) 2. ___ (83) 3. ___ (91)
4. ___ (99) 5. ___ (107)

### Sec. II QUANTITY GENERATED AND MANAGED ON-SITE

A. UOM 1 (115) Density 8.00 (116) lbs/gal *(Same unit and density must be used for all quantities on this page)*

Quantity generated in : B Previous reporting year 0.0 (120). C. Current reporting year 160.0 (130)

D. Did this location do any of the following to this waste (at this location): manage in exempt or regulated treatment, recycling, or disposal process? N (140) Y= Yes (Continue to System 1) N= No (Skip to Sec. III)

On-Site System 1: System Type M (141) ___ Quantity managed on-site this year (145) ___

On-Site System 2: System Type M (155) ___ Quantity managed on-site this year (159) ___

### Sec. III OFF-SITE SHIPMENT

A. Was any of this waste shipped off site this reporting year? N (169) Y= Yes (Continue to Box B) N= No (Skip to Sec. IV)

Site 1: Name and address of facility:
TRADE WASTE INCINERATION
#7 MOBILE AVE, SAUGET, IL 62201

B. U.S. EPA ID No. of facility waste was shipped to: ILD 098642424 (170)

C. System type shipped to M 043 (182) D. Off-site availability code 1 (186)

E. Total quantity shipped in this reporting year: 160.0 (187)

Site 2: Name and address of facility:

B. U.S. EPA ID No. of facility waste was shipped to: ___ (197)

C. System type shipped to M ___ (209) D. Off-site availability code ___ (213)

E. Total quantity shipped in this reporting year: ___ (214)

### Sec. IV NEW WASTE MINIMIZATION ACTIVITIES

A. Did new activities in this year result in minimization of this waste? N (224) Y= Yes (Cont. to Box B) N= No (Cont. to Sec. V)

B. Activity W ___ (225) W ___ (228) W ___ (231) W ___ (234) C. Other effects (Y=Yes, N=No) ___ (237)

D. Quantity recycled in reporting year due to new activities ___ (238)

E. Activity/production index ___ (248) F. Reporting year Source reduction quantity ___ (251)

### Sec. V REGULATED STORAGE

A. Did this site store RCRA wastes 90 days or more and then ship it off-site (to site shown in Section III)? (Y=Yes, N=No) N (261)

B. Did this site store RCRA wastes on-site for more than 90 days but waste is in storage at year end: (Y= Yes, N= No) N (262)

Quantity stored at year end and for 90 days or more that was generated this reporting year: ___ (263)

Quantity stored at year end that was generated prior to this reporting year: ___ (273)

COMMENTS: ___ (283) Enter Y (Yes) if you have comments regarding this page and attach extra sheet.

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# LLINOIS Environmental Protection Agency
## 994 Hazardous Waste Report
## 'orm GM -- Waste Generation and Management

### Sec. I WASTE DESCRIPTION

A. Waste Description: PRIMARY & SECONDARY SOLIDS FROM SURFACE IMPOUNDMENT CLEAN-UP
B. EPA Hazardous Waste Code F037 (30) F038 (34) ___ (38) ___ (42) ___ (46)
C. SIC code 2911 (50)
D. Origin Code 1 (54) System type M (55) ___ E. Source code A (59) 60 A (62) ___ A (85) ___
F. Point of measurement 1 (68) G. Waste form code B (89) 301
H. Radioactive mixed 2 (73) I. TRI constituent 8 (74)
J. CAS numbers: 1. (75) ___-__-__ 2. (83) ___-__-__ 3. (91) ___-__-__
4. (99) ___-__-__ 5. (107) ___-__-__

### Sec. II QUANTITY GENERATED AND MANAGED ON-SITE

A. UOM 2 (115) Density 10.10 (116) lbs/gal *(Same unit and density must be used for all quantities on this page)*
Quantity generated in : B Previous reporting year (120) 37394.0 C. Current reporting year (130) 14895.0
D. Did this location do any of the following to this waste (at this location): manage in exempt or regulated treatment, recycling, or disposal process? N (140) Y= Yes (Continue to System 1) N= No (Skip to Sec. III)
On-Site System 1: System Type M (141) ___ Quantity managed on-site this year (145) ___.__
On-Site System 2: System Type M (155) ___ Quantity managed on-site this year (159) ___.__

### Sec. III OFF-SITE SHIPMENT

A. Was any of this waste shipped off site this reporting year? Y (169) Y= Yes (Continue to Box B) N= No (Skip to Sec. IV)
**Site 1:** Name and address of facility:
PEORIA DISPOSAL COMPANY
4349 SOUTHPORT ROAD. PEORIA, IL 61615
B. U.S. EPA ID No. of facility waste was shipped to: (170) ILD000805812
C. System type shipped to M (182) 132 D. Off-site availability code (186) 1
E. Total quantity shipped in this reporting year: (187) 14895.0
**Site 2:** Name and address of facility:

B. U.S. EPA ID No. of facility waste was shipped to: (197) ___
C. System type shipped to M (209) ___ D. Off-site availability code (213) ___
E. Total quantity shipped in this reporting year: (214) ___.__

### Sec. IV NEW WASTE MINIMIZATION ACTIVITIES

A. Did new activities in this year result in minimization of this waste? Y (224) Y= Yes (Cont. to Box B) N= No (Cont. to Sec. V)
B. Activity W (225) 64 W (228) ___ W (231) ___ W (234) ___ C. Other effects (Y=Yes, N=No) (237) ___
D. Quantity recycled in reporting year due to new activities (238) 0.0
E. Activity/production index (248) ___.__ F. Reporting year Source reduction quantity (251) ___.__

### Sec. V REGULATED STORAGE

A. Did this site store RCRA wastes 90 days or more and then ship it off-site (to site shown in Section III)? (Y=Yes, N=No) N (261)
B. Did this site store RCRA wastes on-site for more than 90 days but waste is in storage at year end: (Y= Yes, N= No) N (262)
Quantity stored at year end and for 90 days or more that was generated this reporting year: (263) ___.__
Quantity stored at year end that was generated prior to this reporting year: (273) ___.__

COMMENTS: (283) ___ Enter Y (Yes) if you have comments regarding this page and attach extra sheet.

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# LLINOIS Environmental Protection Agency
## 994 Hazardous Waste Report
## orm GM -- Waste Generation and Management

### Sec. I WASTE DESCRIPTION

A. Waste Description: WASTE MERCURY COMPOUND

B. EPA Hazardous Waste Code D009 (30) ___ (34) ___ (38) ___ (42) ___ (46)

C. SIC code 2911

D. Origin Code 1 (50) System type M (54) ___

E. Source code A 58 (59) A ___ (62) A ___ (65)

F. Point of measurement 1 (68)

G. Waste form code B 001 (69)

H. Radioactive mixed 2 (73)

I. TRI constituent 8 (74)

J. CAS numbers: 1. ___ (75) 2. ___ (83) 3. ___ (91)
4. ___ (99) 5. ___ (107)

### Sec. II QUANTITY GENERATED AND MANAGED ON-SITE

A. UOM 1 (115) Density 9.00 (116) lbs/gal *(Same unit and density must be used for all quantities on this page)*

Quantity generated in : B Previous reporting year (120) 0.0. C. Current reporting year (130) 5.0

D. Did this location do any of the following to this waste (at this location): manage in exempt or regulated treatment, recycling, or disposal process? N (140) Y= Yes (Continue to System 1) N= No (Skip to Sec. III)

On-Site System 1: System Type M (141) ___ Quantity managed on-site this year (145) ___

On-Site System 2: System Type M (155) ___ Quantity managed on-site this year (159) ___

### Sec. III OFF-SITE SHIPMENT

A. Was any of this waste shipped off site this reporting year? Y (169) Y= Yes (Continue to Box B) N= No (Skip to Sec. IV)

Site 1: Name and address of facility:
CONTROL WASTE DIVISION
MENOMONEE FALLS, WI 53051

B. U.S. EPA ID No. of facility waste was shipped to: WID 003967148 (170)

C. System type shipped to M 019 (182) D. Off-site availability code 1 (186)

E. Total quantity shipped in this reporting year: (187) 5.0

Site 2: Name and address of facility:

B. U.S. EPA ID No. of facility waste was shipped to: (197) ___

C. System type shipped to M (209) ___ D. Off-site availability code (213)

E. Total quantity shipped in this reporting year: (214) ___

### Sec. IV NEW WASTE MINIMIZATION ACTIVITIES

A. Did new activities in this year result in minimization of this waste? N (224) Y= Yes (Cont. to Box B) N= No (Cont. to Sec. V)

B. Activity W (225) ___ W (228) ___ W (231) ___ W (234) ___ C. Other effects (Y=Yes, N=No) (237)

D. Quantity recycled in reporting year due to new activities (238) ___

E. Activity/production index (248) ___ F. Reporting year Source reduction quantity (251) ___

### Sec. V REGULATED STORAGE

A. Did this site store RCRA wastes 90 days or more and then ship it off-site (to site shown in Section III)? (Y=Yes, N=No) N (261)

B. Did this site store RCRA wastes on-site for more than 90 days but waste is in storage at year end: (Y= Yes, N= No) N (262)

Quantity stored at year end and for 90 days or more that was generated this reporting year: (263) ___

Quantity stored at year end that was generated prior to this reporting year: (273) ___

COMMENTS: ___ (283) Enter Y (Yes) if you have comments regarding this page and attach extra sheet.

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# LLINOIS Environmental Protection Agency
## 994 Hazardous Waste Report
## 'orm GM -- Waste Generation and Management

### Sec. I WASTE DESCRIPTION

A. Waste Description: CONTAMINATED ROCKS WITH CHROMIUM

B. EPA Hazardous Waste Code D007 (30) ___ (34) ___ (38) ___ (42) ___ (46) ___

C. SIC code 2911 (50)

D. Origin Code 1 (54) System type M (55) ___

E. Source code A 53 (59) A ___ (62) A ___ (65)

F. Point of measurement 1 (68)

G. Waste form code B 302 (69)

H. Radioactive mixed 2 (73)

I. TRI constituent 8 (74)

J. CAS numbers: 1. ___ (75) 2. ___ (83) 3. ___ (91)
4. ___ (99) 5. ___ (107)

### Sec. II QUANTITY GENERATED AND MANAGED ON-SITE

A. UOM 2 (115) Density 10.00 (116) lbs/gal *(Same unit and density must be used for all quantities on this page)*

Quantity generated in : B Previous reporting year 0.0 (120) C. Current reporting year 80.0 (130)

D. Did this location do any of the following to this waste (at this location): manage in exempt or regulated treatment, recycling, or disposal process? N (140) Y= Yes (Continue to System 1) N= No (Skip to Sec. III)

On-Site System 1: System Type M (141) ___ Quantity managed on-site this year ___ (145)

On-Site System 2: System Type M (155) ___ Quantity managed on-site this year ___ (159)

### Sec. III OFF-SITE SHIPMENT

A. Was any of this waste shipped off site this reporting year? Y (169) Y= Yes (Continue to Box B) N= No (Skip to Sec. IV)

Site 1: Name and address of facility:
ADAMS CENTER LANDFILL
4636 ADAM CENTER Rd. FORT WAYNE, IN. 66806

B. U.S. EPA ID No. of facility waste was shipped to: IND078911146 (170)

C. System type shipped to M 132 (182) D. Off-site availability code 1 (186)

E. Total quantity shipped in this reporting year: 80.0 (187)

Site 2: Name and address of facility:

B. U.S. EPA ID No. of facility waste was shipped to: ___ (197)

C. System type shipped to M ___ (209) D. Off-site availability code ___ (213)

E. Total quantity shipped in this reporting year: ___ (214)

### Sec. IV NEW WASTE MINIMIZATION ACTIVITIES

A. Did new activities in this year result in minimization of this waste? Y (224) Y= Yes (Cont. to Box B) N= No (Cont. to Sec. V)

B. Activity W 89 (225) W ___ (228) W ___ (231) W ___ (234) C. Other effects (Y=Yes, N=No) ___ (237)

D. Quantity recycled in reporting year due to new activities ___ (238)

E. Activity/production index ___ (248) F. Reporting year Source reduction quantity ___ (251)

### Sec. V REGULATED STORAGE

A. Did this site store RCRA wastes 90 days or more and then ship it off-site (to site shown in Section III)? (Y=Yes, N=No) N (261)

B. Did this site store RCRA wastes on-site for more than 90 days but waste is in storage at year end: (Y= Yes, N= No) N (262)

Quantity stored at year end and for 90 days or more that was generated this reporting year: ___ (263)

Quantity stored at year end that was generated prior to this reporting year: ___ (273)

COMMENTS: ___ (283) Enter Y (Yes) if you have comments regarding this page and attach extra sheet.

[Location label with ID#s]

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62040

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# ILLINOIS Environmental Protection Agency
# 1994 Hazardous Waste Report
# Form TI -- Transporter Identification

1. U.S. EPA ID No. (30) ILD009848193, Illinois Special Waste Hauling Permit No. (126) 0082
Transporter Name and Address:

2. U.S. EPA ID No. (42) ILD007814825, Illinois Special Waste Hauling Permit No. (130) 0093
Transporter Name and Address:

3. U.S. EPA ID No. (54) ILD053980272, Illinois Special Waste Hauling Permit No. (134) 0028
Transporter Name and Address:

4. U.S. EPA ID No. (66) ILD099202681, Illinois Special Waste Hauling Permit No. (138) 0015
Transporter Name and Address:

5. U.S. EPA ID No. (78) MOD095038998, Illinois Special Waste Hauling Permit No. (142) 1513
Transporter Name and Address:

6. U.S. EPA ID No. (90) ——————————, Illinois Special Waste Hauling Permit No. (146) ————
Transporter Name and Address:

7. U.S. EPA ID No. (102) ——————————, Illinois Special Waste Hauling Permit No. (150) ————
Transporter Name and Address:

8. U.S. EPA ID No. (114) ——————————, Illinois Special Waste Hauling Permit No. (154) ————
Transporter Name and Address:

**COMMENTS:** (158) ____ Enter Y (Yes) if you have comments regarding this page and attach extra sheet.

# INSPECTION PLAN FOR CLARK OIL AND REFINING COPR.

1190500002 - Madison County
Clark Oil and Refining Corporation
ILD041889023

Clark Oil and Refining Corporation
201 E. Hawthorn
P.O. Box 7
Hartford, Illinois 62048
(618)254-7301

| Post-it™ brand fax transmittal memo 7671 | # of pages ▸ 3 |
|---|---|
| To Mike Ribordy | From Chris Cabnovsky |
| Co. USEPA | Co. IEPA |
| Dept. | Phone # 618-346-5120 |
| Fax # 312-353-4788 | Fax # 618-346-5155 |

**Regulated as:** Large Quantity Generator of Hazardous Waste

**Contact:** Bill Irwin - Environmental Engineer Mike Grant.

**Date of Last Inspection:** June 30, 1993

**Conduct the Entrance Interview:**

* Introduction of the inspection team.
* Statement of the purpose of the inspection.
* Overview of the manufacturing and waste management practices associated with the facility.

**Visual Site Inspection:**

- Manufacturing processes.
- Wastewater Treatment Plant
  - API Separator
  - DAF
  - Agitation Tank 4
  - "Concrete Pond"
  - Guard Basin
  - Dewatering Facility - Filter Press
  - Slop Oil Equalization Tanks (2)
  - Tank 5-10
  - Vacuum Truck Waste Transfer System
- Drum Accumulation Building
- Laboratory
- Coker Unit
  - Tank T-18 – Takes sludge from T-4 agitator Tank.
- Heat Exchanger Bundle Cleaning Pad

**The following data will be reviewed for this inspection:**

- 1993 and 1994 Hazardous Waste Annual Reports.
- 1993, 1994 and 1995 Hazardous Waste Manifests and other waste deposition data.
- Waste analysis.
- Hazardous Waste contingency plan.
- Personnel training for hazardous waste.
- Facility inspection records.
- Land Disposal Restriction Records.
- Any other pertinent material.

**INSPECTION PRE-PLAN FOR MAY INSPECTION AT CLARK OIL AND REFINING**

Review NPDES Permit #IL0001244 Issued May 3, 1993.

Review Federal Register on Refinery Coke Operations.

Newly listed waste codes for coking operations K143-K147 (Steel Mills vs Petroleum Refineries)?

A:\CLARK.IPP

*Illinois Environmental Protection Agency*
*Division of Land Pollution Control*

# RCRA INSPECTION REPORT

| | |
|---|---|
| USEPA #: IL D041889023 | IEPA #: 1190500002 |
| Facility Name: Clark Oil and Refining | Phone #: 618/254-7301 |
| Street Address: Hawthorne Street, P.O. BOX 7 | County: Madison |
| City: Hartford | State: Illinois Zip: 62048 |
| Region: 6 | Inspection Date: 8/5/93 From: 9:00 a.m. To: 12:30 pm |
| Weather: Cloudy - overcast | |

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### TYPE OF FACILITY

| | |
|---|---|
| Notified As: Generator | Regulated As: G/S/D |
| LDF? yes (Yes or No) HPV? yes | 90-Day F/U Required?: YES X NO ___ |

### TYPE OF INSPECTION

CEI: ___ Sampling: X 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: 08/18/80, from (initial) or (subsequent) Notification.

Initial Part A Date: 11/18/80 Amended: __/__/__

Part A Withdrawal requested: 11/23/82 Approved by (US)(IL) EPA: 12/15/83

### PART B PERMIT APPLICATION

Part B Permit Submitted: Y or (N) __/__/__ Final Permit Issued: __/__/__

### ENFORCEMENT

Has the firm been referred to -- USEPA: Y or N __/__/__

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

### ORDERS ISSUED

CACO: __/__/__ CAFO: __/__/__ 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 1990 | 1991 | 1992 |
|---|---|---|---|---|---|---|---|---|---|
| S04 | No | No | Yes | no | no | no | N/A | no | no |
| | | | | | | | | | |
| | | | | | | | | | |
| | | | | | | | | | |
| | | | | | | | | | |
| | | | | | | | | | |
| | | | | | | | | | |

| OWNER | | OPERATOR | |
|---|---|---|---|
| Name | Clark Oil & Refining | Name | Same |
| Address | 8182 Maryland Ave | Address | |
| City | St. Louis | City | |
| State | Mo. Zip 63105 | State | Zip |
| Phone # | 314/889-9600 | Phone # | |

| PERSON(S) INTERVIEWED | TITLE | PHONE # |
|---|---|---|
| Richard Thomas | Environmental Eng | 618/254-7301 |
| | | |
| | | |
| | | |
| | | |
| | | |

| INSPECTION PARTICIPANT(S) | AGENCY/TITLE | PHONE # |
|---|---|---|
| Chris Cabnarsky | IEPA/EPS II | 618/346-5120 |
| Doug Hayward | IEPA/EPS I | 618/346-5120 |
| Connie Letsky | IEPA/EPS I | 618/346-5120 |
| | | |

| PREPARED BY | AGENCY/TITLE | PHONE # |
|---|---|---|
| Chris Cabnarsky | IEPA/EPS II | 618/346-5120 |

# SUMMARY OF APPARENT VIOLATIONS

| Area | Class | Section |
|---|---|---|
| DOR | 1 | 703.121(a) |
| DOR | 1 | 703.150(a) |
| DGS | 1 | 725.113(b) |
| DMR | 2 | 725.175 |
| DGW | 1 | 725.190(a) |
| DGW | 1 | 725.191(a) |
| DGW | 1 | 725.192(a) |
| DCL | 1 | 725.212(a) |
| DCL | 1 | 725.218(a) |
| DFR | 1 | 725.242(a) |
| DFR | 1 | 725.244(a) |
| | | |
| | | |

| Area | Class | Section |
|---|---|---|
| GGR | 1 | 722.111 |
| GMR | 1 | 722.123(a) |
| GPT | 1 | 722.134(a) |
| | | 725.131 |
| | | 725.292(g) |
| | | 725.296(b) |
| | | 725.295(a) |
| GPT | 1 | 722.134(c) |
| GRR | 2 | 722.140(e) |
| DGS | 2 | 725.115(a) |
| DGS | 2 | 725.115(b) |
| DGS | 1 | 725.116(a) |
| DCP | 2 | 725.152(b) |

| Area | Class | Section |
|---|---|---|
| DMR | 2 | 725.173 |
| DSI | 1 | 725.323 |
| DSI | 2 | 725.326 |
| GLB | 1 | 728.107(a)(7) |
| GLB | 1 | 728.107(a)(5) |
| | | |
| | | |
| | | |
| | | |
| | | |
| | | |
| | | |
| | | |

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1190500002 - Madison County
Clark Oil and Refining Company
ILD041889023

REMARKS

A sampling inspection was conducted at this facility on August 5, 1993. Present during this inspection were Chris Cahnovsky, Doug Hayward and Connie Letsky - IEPA; and Richard Thomas, Clark Oil. The purpose of this inspection was to obtain samples of 13 drums of soil from the installation of groundwater monitoring wells. Eight wells (GB 1, GB 2, GB 3, GB 4, LP 1, LP 2, LP 3, and LP 4) were installed between January 15 and February 8, 1993. These drums are located on the west side of building B-73. This is the building located west of the storm water pump house.

Upon arrival at this site, it was discovered that there were actually 15 drums. Upon observation of these drums, it was determined that one was empty and one was not marked and this unmarked drum was partially full. It was decided not to sample these two drums.

The 13 drums were marked X101 through X113 with a grease marker. One sample was taken from each drum. Each sample consisted of three jars; one 32 oz. and one 2 oz. for TCLP volatile organics (benzene) and one 32 oz. for TCLP metals. These thirteen samples were obtained using stainless steel scoops and spoons, except for X102 and X112, which were obtained using stainless steel sampling tubes. Each scoop, spoon and tube was decontaminated at the Collinsville Office before use in the field. Fresh gloves, spoons, scoops and tubes were used for each sample. Each sample was sealed with evidence tape and the samples being analyzed for organics were placed in a cooler containing ice packs.

The samples being analyzed for TCLP organics were sent to the Springfield laboratory and the samples being analyzed for TCLP metals were sent to the Chicago Laboratory. If any of these samples fail the TCLP, then RCRA closure for this container storage area may be required.

CNC

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Sampling Data
Clark Oil
Aug. 5, 1993

Collected by: Chris Cahnovsky
Connie Letsky
Doug Hayward

Photos Taken:
exp. 3,4,5
@ 12:06

| Sample Type* | Time Taken | Time Sealed | Drum ** Label |
|---|---|---|---|
| TCLP X101, METALS X101 | 10:27 | 10:29 | GB-1 U |
| TCLP X102, METALS X102 | 10:39 | 10:40 | GB-4 C |
| TCLP X103, METALS X103 | 10:52 | 10:53 | GB-1 U |
| TCLP X104, METALS X104 | 10:59 | 10:59 | UNMARKED |
| TCLP X105, METALS X105 | 11:04 | 11:05 | LP-1 C |
| TCLP X106, METALS X106 | 11:11 | 11:11 | LP-1 C |
| TCLP X107, METALS X107 | 11:17 | 11:17 | LP-2 U/C |
| TCLP X108, METALS X108 | 11:24 | 11:25 | UNMARKED |
| TCLP X109, METALS X109 | 11:29 | 11:30 | GB-3 U |
| TCLP X110, METALS X110 | 11:36 | 11:37 | GB-3 U |
| TCLP X111, METALS X111 | 11:43 | 11:45 | GB-2 C |
| TCLP X112, METALS X112 | 11:54 | 11:55 | GB-2 C |
| TCLP X113, METALS X113 | 12:05 | 12:06 | GB-4 C |

* TCLP = one 32 oz. and one 2 oz. jar.
  Metals = one 32 oz. jar.

** Drum labeled by Clark corresponding to the GWM well number.

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THE ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF LAND POLLUTION
RECEIPT FOR SAMPLES

Site Inventory #: 1190500002 Facility Name: Clark Oil & Refining Co.

Federal I.D. #: _____ County: Madison

| Sample #: | Consisting of the Indicated # of Bottles | Date Collected |
|---|---|---|
| X101 | 3 | 8/5/93 |
| X102 | 3 | |
| X103 | 3 | |
| X104 | 3 | |
| X105 | 3 | |
| X106 | 3 | |
| X107 | 3 | |
| X108 | 3 | |
| X109 | 3 | |
| X110 | 3 | |
| X111 | 3 | |
| X112 | 3 | |
| X113 | 3 | |

Duplicate Samples requested: ☐ Yes ☒ No

Receipt for samples listed above is hereby acknowledged.

| | | |
|---|---|---|
| Richard Shannon | Environmental Engr | 8/5/93 |
| Signature Owner/Operator/Agent | Title | Date |
| Christopher N. Chmovsky | EPS II | 8/5/93 |
| Agency Representative | Title | Date |

COMMENTS: TCLP Metals & Organics for 13 drums of soil from GWM wells

NOTE: White Copy - Division File
Yellow Copy - Regions
Pink Copy - Owner/Operator/Agent

3:TH:lhh:AC-XI

IL 532-1752
LPC 309 12/88

Page 1 of 1

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AUG 1 3 1993
IEPA-DLPC

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF LAND POLLUTION CONTROL
CHAIN OF CUSTODY

I certify that the samples listed below were collected in my presence and that each sample bottle was sealed intact by me and that I wrote my initials and the date on the seal of each bottle.

Site Inventory No. 1190500002 County Madison

Federal I.D. No. ILD041889023 Clark Oil + Refining Co (Facility Name)

SAMPLING TEAM

| Sample No. | Initials | Consisting of the Indicated No. of Bottles | Date Collected | Time Sealed |
|---|---|---|---|---|
| X101 | DXI | 1 | 8/5/93 | 10:29 AM/PM |
| X102 | DXI | 1 | | 10:40 AM/PM |
| X103 | DXI | 1 | | 10:53 AM/PM |
| X104 | DXI | 1 | | 10:59 AM/PM |
| X105 | DXI | 1 | | 11:05 AM/PM |
| X106 | DXI | 1 | | 11:11 AM/PM |
| X107 | DXI | 1 | | 11:17 AM/PM |
| X108 | DXI | 1 | | 11:25 AM/PM |
| X109 | DXI | 1 | | 11:30 AM/PM |
| X110 | DXI | 1 | | 11:37 AM/PM |

Sealer's Signature [signature] Date _____ Time _____ AM/PM

Sampler(s) Chris Pahnovsky Connie Letsky Irving Hayward

CARRIERS

I certify I received the above samples, with each seal on each bottle intact and the sealer's initials written on each sample seal.

| Relinquished By (Signature) | Date | Time | Received By (Signature) | Date | Time |
|---|---|---|---|---|---|
| [signature] | 8/5/93 | 3:30 AM/PM | UPS | 8/5/93 | 3:30 AM/PM |
| | | AM/PM | | | AM/PM |
| | | AM/PM | | | AM/PM |
| | | AM/PM | | | AM/PM |
| | | AM/PM | | | AM/PM |
| | | AM/PM | | | AM/PM |
| | | AM/PM | | | AM/PM |

LAB CUSTODIAN

I certify I received the above samples with each seal on each bottle intact, and the sealer's initials written on each sample seal. After recording these samples in the official record book, these same samples will be in the custody of competent laboratory personnel at all times or locked in a secured area.

Signature _____ Date _____ Time _____ A.M. P.M.

Lab Location _____ (City)

IL 532-1147
LPC 141 9/83

120-011

RECEIVED
AUG 1 3 1993
IEPA-DLPC

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF LAND POLLUTION CONTROL
CHAIN OF CUSTODY

I certify that the samples listed below were collected in my presence and that each sample bottle was sealed intact by me and that I wrote my initials and the date on the seal of each bottle.

Site Inventory No. 1190500002 County Madison

Federal I.D. No. ILD041889023 Clark Oil & Refining Co.
(Facility Name)

SAMPLING TEAM

| Sample No. | Initials | Consisting of the Indicated No. of Bottles | Date Collected | Time Sealed |
|---|---|---|---|---|
| X111 | [illegible] | 1 | 8/5/93 | 11:45 AM/PM |
| X112 | [illegible] | 1 | 1 | 11:55 AM/PM |
| X113 | [illegible] | 1 | | 12:06 AM/PM |
| | | | | AM/PM |
| | | | | AM/PM |
| | | | | AM/PM |
| | | | | AM/PM |
| | | | | AM/PM |
| | | | | AM/PM |
| | | | | AM/PM |

Sealer's Signature [illegible] Date _____ Time _____ AM/PM

Sampler(s) Chris Pahoovsky Connie Letsky [illegible]

I certify I received the above samples, with each seal on each bottle intact and the sealer's initials written on each sample seal.

CARRIERS

| Relinquished By (Signature) | Date | Time | Received By (Signature) | Date | Time |
|---|---|---|---|---|---|
| [illegible] | 8/5/93 | 3:30 AM/PM | UPS | 8/5/93 | 3:30 AM/PM |
| | | AM/PM | | | AM/PM |
| | | AM/PM | | | AM/PM |
| | | AM/PM | | | AM/PM |
| | | AM/PM | | | AM/PM |
| | | AM/PM | | | AM/PM |
| | | AM/PM | | | AM/PM |

LAB CUSTODIAN

I certify I received the above samples with each seal on each bottle intact, and the sealer's initials written on each sample seal. After recording these samples in the official record book, these same samples will be in the custody of competent laboratory personnel at all times or locked in a secured area.

Signature _____ Date _____ Time _____ A.M. P.M.

Lab Location _____ (City)

IL 532-1147
LPC 141 9/83

120-011

RECORD CODE L P C S M 0 1 (1–7) TRANS CODE A (8)

# ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
## DIVISION OF LAND POLLUTION CONTROL
## CHEMICAL ANALYSIS FORM



REPORT DUE DATE 36 M / D / Y 41

FEDERAL ID NUMBER I L D 0 4 1 8 8 9 0 6 3

SITE INVENTORY NUMBER 1 1 9 0 5 0 0 0 0 2 (9–18)

REGION 6 CO. Madison

Clark Oil - Refining Company
FACILITY NAME

MONITOR POINT NUMBER X 1 0 1 (19–22)
(see Instructions)

DATE COLLECTED 0 8 / 0 5 / 9 3 (23 M D Y 28)

IEPA LAB (x or Blank) X (29)
(see Instructions)

FOR IEPA USE ONLY

COMPLAINT NO.

DATE RECEIVED 42 M / D / Y 47

SAMPLING PURPOSE CODE 4 (48)
(see Instructions)

TIME CARD PROGRAM CODE L P 4 1 (49–52) & UNIT CODE J (53)

BACKGROUND SAMPLE (X) 54

TIME COLLECTED (24 HR CLOCK) 1 0 2 7 (55 H M 58)

UNABLE TO COLLECT SAMPLE 59
(see Instructions)

MONITOR POINT SAMPLED BY Q (60) SS Scoop or Tube
(see Instructions) OTHER (SPECIFY)

SAMPLE FIELD FILTERED - INORGANICS (X) 61 ORGANICS (X) 62

SAMPLE APPEARANCE 63 Petroleum Soil Sand and Clay

COLLECTOR COMMENTS 103 from GWM Well Installation

RECEIVED
AUG 13 1993
IEPA-DLPC

SPECIAL INSTRUCTIONS TO LAB TCLP - Metals

Chris Cahnovsky — COLLECTED BY
CNC (143–145) INITIALS
DLPC/IEPA — DIVISION OR COMPANY
UPS — TRANSPORTED BY
DIVISION OR COMPANY

LAB USE ONLY

LAB SAMPLE NO. _____ LAB NAME _____ LAB ID NO. 146 — — 149

DATE RECEIVED _____ AND ADDRESS _____

TIME RECEIVED _____

SAMPLE TEMP OKAY (Y/N) SAMPLE PROPERLY PRESERVED (Y/N) DATE COMPLETED _____ FORWARD _____

LAB COMMENTS 150 _____ 199

SUPERVISOR SIGNATURE

RECORD CODE L P C S M 0 2 (1–7) TRANS CODE A (8) (COLUMNS 9-29 FROM ABOVE)

| FIELD MEASUREMENTS CONSTITUENT DESCRIPTION AND REQUIRED UNIT OF MEASURE | STORET NUMBER | | | < OR > | VALUE | REPORTING LEVEL | |
|---|---|---|---|---|---|---|---|
| DEPTH TO WATER (ft. below LS) | 7 2 0 1 9 (30–34) | 35 | 36 | 37 | 38 . 47 | 48 | 49 |
| ELEVATION OF GW SURFACE (ft. ref MSL) | 7 1 9 9 3 | | | | . | | |
| TOTAL WELL DEPTH (ft. below LS) | 7 2 0 0 8 | | | | . | | |
| pH (units) - Field | 0 0 4 0 0 | | | | . | | |
| SPEC CONDUCTANCE (umhos) - Field | 0 0 0 9 4 | | | | . | | |
| TEMP OF WATER SAMPLE (°F) - Field | 0 0 0 1 1 | | | | . | | |
| DEPTH TO btm. CASING FROM M.P. (ft.) | 7 2 0 3 9 | | | | . | | |
| DEPTH TO WATER FROM M.P. (ft.) | 7 2 1 0 9 | | | | . | | |
| ELEVATION btm. CASING, MSL (ft.) | 7 2 0 2 0 | | | | . | | |
| M.P. ELEVATION ABOVE L.S. (ft.) | 8 2 5 1 5 | | | | | | |

RECORD CODE | L | P | C | S | M | 0 | 1 | (1–7) TRANS CODE | A | (8)

# ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
## DIVISION OF LAND POLLUTION CONTROL
## CHEMICAL ANALYSIS FORM



REPORT DUE DATE (36) M / D / Y (41)

FEDERAL ID NUMBER I L D 0 4 1 8 8 9 0 2 3

SITE INVENTORY NUMBER 1 1 9 0 5 0 0 0 0 2 (9–18)

MONITOR POINT NUMBER X 1 0 2 (19–22)
(see Instructions)

REGION 6 CO. Madison

DATE COLLECTED 0 8 / 0 5 / 9 3 (23 M / D / Y 25)

Clark Oil & Refining Company
FACILITY NAME

IEPA LAB (x or Blank) X (29)
(see Instructions)

FOR IEPA USE ONLY

COMPLAINT NO. (30–35)

DATE RECEIVED (42 M / D / Y 47)

SAMPLING PURPOSE CODE 4 (48)
(see Instructions)

TIME CARD
PROGRAM CODE L P 4 1 (49–52) & UNIT CODE J (53)

BACKGROUND SAMPLE (X) (54)

TIME COLLECTED (24 HR CLOCK) 1 0 . 3 9 (55 H M 59)

UNABLE TO COLLECT SAMPLE (59)
(see Instructions)

MONITOR POINT SAMPLED BY Q (60) SS Scoop or Tube
(see Instructions) OTHER (SPECIFY)

SAMPLE FIELD FILTERED - INORGANICS (X) (61) ORGANICS (X) (62)

SAMPLE APPEARANCE (63) Petroleum Soil Sand and Clay

COLLECTOR COMMENTS (103) from Cwm well Installation

RECEIVED (102)
AUG 13 1993
IEPA-DLPC

SPECIAL INSTRUCTIONS TO LAB TCLP - Metals

Chris Cabrowsky (70) C N C (75) DLPC / IEPA VPS
COLLECTED BY INITIALS DIVISION OR COMPANY TRANSPORTED BY DIVISION OR COMPANY

### LAB USE ONLY

LAB SAMPLE NO. _____ LAB NAME _____ LAB ID NO. (146–149)

DATE RECEIVED _____ AND ADDRESS _____

TIME RECEIVED _____

SAMPLE TEMP OKAY (Y/N) SAMPLE PROPERLY PRESERVED (Y/N) DATE COMPLETED _____ FORWARD _____

LAB COMMENTS (150–199)

SUPERVISOR SIGNATURE

RECORD CODE | L | P | C | S | M | 0 | 2 | (1–7) TRANS CODE | A | (8) (COLUMNS 9-29 FROM ABOVE)

| FIELD MEASUREMENTS CONSTITUENT DESCRIPTION AND REQUIRED UNIT OF MEASURE | STORET NUMBER (10–14) | (15) | (16) | (17) < OR > | VALUE (18–17) | REPORTING LEVEL (18) | REPORTING LEVEL (19) |
|---|---|---|---|---|---|---|---|
| DEPTH TO WATER (ft. below LS) | 7 2 0 1 9 | | | | | | |
| ELEVATION OF GW SURFACE (ft. ref MSL) | 7 1 9 9 3 | | | | | | |
| TOTAL WELL DEPTH (ft. below LS) | 7 2 0 0 8 | | | | | | |
| pH (units) - Field | 0 0 4 0 0 | | | | | | |
| SPEC CONDUCTANCE (umhos) - Field | 0 0 0 9 4 | | | | | | |
| TEMP OF WATER SAMPLE (°F) - Field | 0 0 0 1 1 | | | | | | |
| DEPTH TO btm. CASING FROM M.P. (ft.) | 7 2 0 3 9 | | | | | | |
| DEPTH TO WATER FROM M.P. (ft.) | 7 2 1 0 9 | | | | | | |
| ELEVATION btm. CASING, MSL (ft.) | 7 2 0 2 0 | | | | | | |
| M.P. ELEVATION ABOVE LS (ft.) | 8 2 5 1 5 | | | | | | |

RECORD CODE | L | P | C | S | M | 0 | 1 | (1–7) TRANS CODE | A | (8)

# ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
## DIVISION OF LAND POLLUTION CONTROL
## CHEMICAL ANALYSIS FORM



REPORT DUE DATE (36) M / D / Y (41)

FEDERAL ID NUMBER I L D 0 4 1 8 8 9 0 3

SITE INVENTORY NUMBER 1 1 9 0 5 0 0 0 0 2 (9–16)

REGION 6 CO. Madison

Mack Oil & Refining Company
FACILITY NAME

MONITOR POINT NUMBER X 1 0 3 (19–22)
(see Instructions)

DATE COLLECTED 0 8 / 0 5 / 9 3 (23 M / D / Y 28)

IEPA LAB (x or Blank) X (29)
(see Instructions)

FOR IEPA USE ONLY — COMPLAINT NO. _ _ _ _ _ _

DATE RECEIVED (42) M / D / Y (47)

SAMPLING PURPOSE CODE 4 (48)
(see Instructions)

TIME CARD PROGRAM CODE L P 4 1 (49–52) & UNIT CODE J (53)

BACKGROUND SAMPLE (X) (54)

TIME COLLECTED (24 HR CLOCK) 1 0 . 5 2 (55 H M 58)

UNABLE TO COLLECT SAMPLE (see Instructions) (59)

MONITOR POINT SAMPLED BY Q (60) SS Scoop & Tube OTHER (SPECIFY)

SAMPLE FIELD FILTERED - INORGANICS (X) (61) ORGANICS (X) (62)

SAMPLE APPEARANCE (63) Petroleum Soil Sand and clay

COLLECTOR COMMENTS (103) from Gum well Installation

SPECIAL INSTRUCTIONS TO LAB TCLP - Metals

RECEIVED (102) AUG 13 1993 IEPA-DLPC (142)

| COLLECTED BY | INITIALS | DIVISION OR COMPANY | TRANSPORTED BY | DIVISION OR COMPANY |
|---|---|---|---|---|
| Chris Pahnovsky | C N C (143–145) | DLPC / IEPA | UPS | |

LAB USE ONLY

LAB SAMPLE NO. _____ LAB NAME _____ LAB ID NO. (146–149)

DATE RECEIVED _____ AND ADDRESS _____

TIME RECEIVED _____

SAMPLE TEMP OKAY (Y/N) SAMPLE PROPERLY PRESERVED (Y/N) DATE COMPLETED _____ FORWARD _____

LAB COMMENTS (150–199)

SUPERVISOR SIGNATURE

RECORD CODE | L | P | C | S | M | 0 | 2 | TRANS CODE | A | (COLUMNS 9-29 FROM ABOVE)

| FIELD MEASUREMENTS CONSTITUENT DESCRIPTION AND REQUIRED UNIT OF MEASURE | STORET NUMBER | | | < OR > | VALUE | REPORTING LEVEL | |
|---|---|---|---|---|---|---|---|
| DEPTH TO WATER (ft. below LS) | 7 2 0 1 9 (10–14) | (15) | (16) | (17) | (18–27) | (28) | (29) |
| ELEVATION OF GW SURFACE (ft. ref MSL) | 7 1 9 9 3 | | | | | | |
| TOTAL WELL DEPTH (ft. below LS) | 7 2 0 0 8 | | | | | | |
| pH (units) - Field | 0 0 4 0 0 | | | | | | |
| SPEC CONDUCTANCE (umhos) - Field | 0 0 0 9 4 | | | | | | |
| TEMP OF WATER SAMPLE (°F) - Field | 0 0 0 1 1 | | | | | | |
| DEPTH TO btm. CASING FROM M.P. (ft.) | 7 2 0 3 9 | | | | | | |
| DEPTH TO WATER FROM M.P. (ft.) | 7 2 1 0 9 | | | | | | |
| ELEVATION btm. CASING, MSL (ft.) | 7 2 0 2 0 | | | | | | |

RECORD CODE | L | P | C | S | M | 0 | 1 | TRANS CODE | A |

# ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
## DIVISION OF LAND POLLUTION CONTROL
## CHEMICAL ANALYSIS FORM



REPORT DUE DATE M / D / Y

FEDERAL ID NUMBER ILD041889023

SITE INVENTORY NUMBER 1 1 9 0 5 0 0 0 0 2

MONITOR POINT NUMBER (see Instructions) X 1 0 7

REGION 6 CO. Madison

DATE COLLECTED 0 5 / 0 5 / 9 3

Clark Oil & Refining Company
FACILITY NAME

IEPA LAB (x or Blank) (see Instructions) X

FOR IEPA USE ONLY | COMPLAINT NO.

BACKGROUND SAMPLE (X)

TIME COLLECTED (24 HR CLOCK) 1 0 . 5 8

DATE RECEIVED M / D / Y

UNABLE TO COLLECT SAMPLE (see Instructions)

SAMPLING PURPOSE CODE (see Instructions) 4

MONITOR POINT SAMPLED BY (see Instructions) Q SS Scoop & Tube
OTHER (SPECIFY)

TIME CARD PROGRAM CODE L P 4 1 & UNIT CODE J

SAMPLE FIELD FILTERED - INORGANICS (X) ORGANICS (X)

SAMPLE APPEARANCE Petroleum Soil Sand and Clay

COLLECTOR COMMENTS From Gw well Installation

RECEIVED AUG 13 1993 IEPA-DLPC

SPECIAL INSTRUCTIONS TO LAB TCLP - Metals

Chris Cahnovsky — COLLECTED BY
C N C — INITIALS
DLPC / IEPA — DIVISION OR COMPANY
UPS — TRANSPORTED BY
DIVISION OR COMPANY

LAB USE ONLY

LAB SAMPLE NO.
LAB NAME AND ADDRESS
LAB ID NO.
DATE RECEIVED
TIME RECEIVED
SAMPLE TEMP OKAY (Y/N)
SAMPLE PROPERLY PRESERVED (Y/N)
DATE COMPLETED
FORWARD
LAB COMMENTS

SUPERVISOR SIGNATURE

RECORD CODE | L | P | C | S | M | 0 | 2 | TRANS CODE | A | (COLUMNS 9-29 FROM ABOVE)

| FIELD MEASUREMENTS CONSTITUENT DESCRIPTION AND REQUIRED UNIT OF MEASURE | STORET NUMBER | | | < OR > | VALUE | REPORTING LEVEL | |
|---|---|---|---|---|---|---|---|
| DEPTH TO WATER (ft. below LS) | 7 2 0 1 9 | | | | | | |
| ELEVATION OF GW SURFACE (ft. ref MSL) | 7 1 9 9 3 | | | | | | |
| TOTAL WELL DEPTH (ft below LS) | 7 2 0 0 8 | | | | | | |
| pH (units) - Field | 0 0 4 0 0 | | | | | | |
| SPEC CONDUCTANCE (umhos) - Field | 0 0 0 9 4 | | | | | | |
| TEMP OF WATER SAMPLE (°F) - Field | 0 0 0 1 1 | | | | | | |
| DEPTH TO btm. CASING FROM M.P. (ft.) | 7 2 0 3 9 | | | | | | |
| DEPTH TO WATER FROM M.P. (ft.) | 7 2 1 0 9 | | | | | | |
| ELEVATION btm. CASING, MSL (ft.) | 7 2 0 2 0 | | | | | | |

RECORD CODE L P C S M 0 1 (1–7) TRANS CODE A (8)

# ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
## DIVISION OF LAND POLLUTION CONTROL
## CHEMICAL ANALYSIS FORM



REPORT DUE DATE 36 M / D / Y 41

FEDERAL ID NUMBER I L D 0 4 1 8 8 9 0 3

SITE INVENTORY NUMBER 1 1 9 0 5 0 0 0 0 2 (9–18)

REGION 6 CO. Madison

Clark Oil + Refining Company

FACILITY NAME

MONITOR POINT NUMBER X 1 0 5 (19–22) (see Instructions)

DATE COLLECTED 0 8 / 0 5 / 9 3 (23 M D Y 28)

IEPA LAB (x or Blank) X (29) (see Instructions)

FOR IEPA USE ONLY

COMPLAINT NO.

DATE RECEIVED 42 M / D / Y 47

SAMPLING PURPOSE CODE 4 (48) (see Instructions)

TIME CARD PROGRAM CODE L P 4 1 (49–52) & UNIT CODE J (53)

BACKGROUND SAMPLE (X) 54

TIME COLLECTED (24 HR CLOCK) 1 1 0 4 (55 H M 5)

UNABLE TO COLLECT SAMPLE (see Instructions) 59

MONITOR POINT SAMPLED BY Q (60) (see Instructions) SS Scoop or Tube OTHER (SPECIFY)

SAMPLE FIELD FILTERED - INORGANICS (X) 61 ORGANICS (X) 62

SAMPLE APPEARANCE 63 Petroleum Soil Sand and Clay

COLLECTOR COMMENTS 103 from GWM Well Installation

RECEIVED AUG 13 1993 102 IEPA-DLPC 142

SPECIAL INSTRUCTIONS TO LAB TCLP - Metals

| Chris Cahnovsky | C N C | DLPC/IEPA | UPS | |
|---|---|---|---|---|
| COLLECTED BY | INITIALS (143–145) | DIVISION OR COMPANY | TRANSPORTED BY | DIVISION OR COMPANY |

LAB USE ONLY

LAB SAMPLE NO. _____ LAB NAME _____ LAB ID NO. 146 — — 149

DATE RECEIVED _____ AND ADDRESS _____

TIME RECEIVED _____

SAMPLE TEMP OKAY (Y/N) SAMPLE PROPERLY PRESERVED (Y/N) DATE COMPLETED _____ FORWARD _____

LAB COMMENTS 150 _____ 199

SUPERVISOR SIGNATURE

RECORD CODE L P C S M 0 2 (1–7) TRANS CODE A (8) (COLUMNS 9-29 FROM ABOVE)

| FIELD MEASUREMENTS CONSTITUENT DESCRIPTION AND REQUIRED UNIT OF MEASURE | STORET NUMBER | | | < OR > | VALUE | REPORTING LEVEL | |
|---|---|---|---|---|---|---|---|
| DEPTH TO WATER (ft. below LS) | 7 2 0 1 9 (10–14) | (15) | (16) | (17) | (18) | (48) | (49) |
| ELEVATION OF GW SURFACE (ft. ref MSL) | 7 1 9 9 3 | | | | | | |
| TOTAL WELL DEPTH (ft. below LS) | 7 2 0 0 8 | | | | | | |
| pH (units) - Field | 0 0 4 0 0 | | | | | | |
| SPEC CONDUCTANCE (umhos) - Field | 0 0 0 9 4 | | | | | | |
| TEMP OF WATER SAMPLE (°F) - Field | 0 0 0 1 1 | | | | | | |
| DEPTH TO btm. CASING FROM M.P. (ft.) | 7 2 0 3 9 | | | | | | |
| DEPTH TO WATER FROM M.P. (ft.) | 7 2 1 0 9 | | | | | | |
| ELEVATION btm. CASING, MSL (ft.) | 7 2 0 2 0 | | | | | | |
| M.P. ELEVATION ABOVE [illegible] (ft.) | [illegible] | | | | | | |

RECORD CODE L P C S M 0 1 | TRANS CODE A

# ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
## DIVISION OF LAND POLLUTION CONTROL
## CHEMICAL ANALYSIS FORM



REPORT DUE DATE 36 M / D / Y 41

FEDERAL ID NUMBER ILD041889023

SITE INVENTORY NUMBER 119050002 (9–18)

REGION 6 CO. Madison

Clark Oil + Refining Company
FACILITY NAME

MONITOR POINT NUMBER X106 (19–22) (see Instructions)

DATE COLLECTED 08/05/93 (23 M D Y 28)

IEPA LAB (x or Blank) X (29) (see Instructions)

FOR IEPA USE ONLY

COMPLAINT NO.

DATE RECEIVED 42 M / D / Y 47

SAMPLING PURPOSE CODE 4 (48) (see Instructions)

TIME CARD PROGRAM CODE LP41 (49–52) & UNIT CODE J (53)

BACKGROUND SAMPLE (X) 54

TIME COLLECTED (24 HR CLOCK) 11:11 (55 H M)

UNABLE TO COLLECT SAMPLE (see Instructions) 59

MONITOR POINT SAMPLED BY Q (60) (see Instructions) SS Scoop or Tube OTHER (SPECIFY)

SAMPLE FIELD FILTERED - INORGANICS (X) 61 ORGANICS (X) 62

SAMPLE APPEARANCE 63 Petroleum Soil Sand and Clay

COLLECTOR COMMENTS 103 from GWM well Installation

SPECIAL INSTRUCTIONS TO LAB TCLP - Metals

RECEIVED 102
AUG 13 1993
IEPA-DLPC 142

Chris Cahnovsky COLLECTED BY | CNC 143–145 INITIALS | DLPC/IEPA DIVISION OR COMPANY | UPS TRANSPORTED BY | DIVISION OR COMPANY

LAB USE ONLY

LAB SAMPLE NO. _____ LAB NAME _____ LAB ID NO. 146 — 149

DATE RECEIVED _____ AND ADDRESS _____

TIME RECEIVED _____

SAMPLE TEMP OKAY (Y/N) SAMPLE PROPERLY PRESERVED (Y/N) DATE COMPLETED _____ FORWARD _____

LAB COMMENTS 150 _____ 199

SUPERVISOR SIGNATURE

RECORD CODE L P C S M 0 2 | TRANS CODE A (COLUMNS 9-29 FROM ABOVE)

| FIELD MEASUREMENTS CONSTITUENT DESCRIPTION AND REQUIRED UNIT OF MEASURE | STORET NUMBER | | | < OR > | VALUE | REPORTING LEVEL | |
|---|---|---|---|---|---|---|---|
| DEPTH TO WATER (ft. below LS) | 72019 | | | | | | |
| ELEVATION OF GW SURFACE (ft. ref MSL) | 71993 | | | | | | |
| TOTAL WELL DEPTH (ft. below LS) | 72008 | | | | | | |
| pH (units) - Field | 00400 | | | | | | |
| SPEC CONDUCTANCE (umhos) - Field | 00094 | | | | | | |
| TEMP OF WATER SAMPLE (°F) - Field | 00011 | | | | | | |
| DEPTH TO btm. CASING FROM M.P. (ft.) | 72039 | | | | | | |
| DEPTH TO WATER FROM M.P. (ft.) | 72109 | | | | | | |
| ELEVATION btm. CASING, MSL (ft.) | 72020 | | | | | | |
| M.P. ELEVATION ABOVE L.S. (ft.) | 82515 | | | | | | |

RECORD CODE L P C S M 0 1 (1–7) TRANS CODE A (8)

# ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
## DIVISION OF LAND POLLUTION CONTROL
## CHEMICAL ANALYSIS FORM



REPORT DUE DATE 36 M / D / Y 41

FEDERAL ID NUMBER I L D 0 4 1 8 8 9 0 3

SITE INVENTORY NUMBER 1 1 9 0 5 0 0 0 0 2 (9–18)

REGION 6 CO. Madison

Clark Oil - Refining Company

FACILITY NAME

MONITOR POINT NUMBER X 1 0 7 (19–22) (see Instructions)

DATE COLLECTED 0 8 0 5 9 3 (23 M D Y 28)

IEPA LAB (x or Blank) X (29) (see Instructions)

FOR IEPA USE ONLY

COMPLAINT NO.

DATE RECEIVED 42 M / D / Y 47

SAMPLING PURPOSE CODE 4 (48) (see Instructions)

TIME CARD PROGRAM CODE L P 4 1 (49–52) & UNIT CODE J (53)

BACKGROUND SAMPLE (X) 54

TIME COLLECTED (24 HR CLOCK) 1 1 : 1 7 (55 H M 58)

UNABLE TO COLLECT SAMPLE (see Instructions) 59

MONITOR POINT SAMPLED BY Q (60) (see Instructions) SS Scoop or Tube OTHER (SPECIFY)

SAMPLE FIELD FILTERED - INORGANICS (X) 61 ORGANICS (X) 62

SAMPLE APPEARANCE 63 Petroleum Soil Sand and Clay

COLLECTOR COMMENTS 103 from GWM well Installation

SPECIAL INSTRUCTIONS TO LAB TCLP - Metals

RECEIVED 102 AUG 1 3 1993 IEPA-DLPC 142

Chris Cahnovsky COLLECTED BY | C N C (143–145) INITIALS | DLPC/IEPA DIVISION OR COMPANY | UPS TRANSPORTED BY | DIVISION OR COMPANY

LAB USE ONLY

LAB SAMPLE NO. _____ LAB NAME _____ LAB ID NO. 146 — — 149

DATE RECEIVED _____ AND ADDRESS _____

TIME RECEIVED _____

SAMPLE TEMP OKAY (Y/N) SAMPLE PROPERLY PRESERVED (Y/N) DATE COMPLETED _____ FORWARD _____

LAB COMMENTS 150 _____ 199

SUPERVISOR SIGNATURE

RECORD CODE L P C S M 0 2 (1–7) TRANS CODE A (8) (COLUMNS 9-29 FROM ABOVE)

| FIELD MEASUREMENTS CONSTITUENT DESCRIPTION AND REQUIRED UNIT OF MEASURE | STORET NUMBER | | | < OR > | VALUE | REPORTING LEVEL | |
|---|---|---|---|---|---|---|---|
| DEPTH TO WATER (ft. below LS) | 7 2 0 1 9 (10–14) | (15) | (16) | (17) | (18) . (19) | (48) | (49) |
| ELEVATION OF GW SURFACE (ft. ref MSL) | 7 1 9 9 3 | | | | . | | |
| TOTAL WELL DEPTH (ft. below LS) | 7 2 0 0 8 | | | | . | | |
| pH (units) - Field | 0 0 4 0 0 | | | | . | | |
| SPEC CONDUCTANCE (umhos) - Field | 0 0 0 9 4 | | | | . | | |
| TEMP OF WATER SAMPLE (°F) - Field | 0 0 0 1 1 | | | | . | | |
| DEPTH TO btm. CASING FROM M.P. (ft.) | 7 2 0 3 9 | | | | . | | |
| DEPTH TO WATER FROM M.P. (ft.) | 7 2 1 0 9 | | | | . | | |
| ELEVATION btm. CASING, MSL (ft.) | 7 2 0 2 0 | | | | . | | |

RECORD CODE L P C S M 0 1 (1–7) TRANS CODE A (8)

# ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
## DIVISION OF LAND POLLUTION CONTROL
## CHEMICAL ANALYSIS FORM



REPORT DUE DATE 36 M / D / Y 41

FEDERAL ID NUMBER ILD041889023

SITE INVENTORY NUMBER 119050002 (9–18)

REGION 6 CO. Madison

Clark Oil & Refining Company
FACILITY NAME

MONITOR POINT NUMBER X108 (19–22) (see Instructions)

DATE COLLECTED 08/05/93 (23 M D Y 28)

IEPA LAB (x or Blank) X (29) (see Instructions)

FOR IEPA USE ONLY — COMPLAINT NO.

DATE RECEIVED 42 M / D / Y 47

SAMPLING PURPOSE CODE 4 (48) (see Instructions)

TIME CARD PROGRAM CODE LP41 (49–52) & UNIT CODE J (53)

BACKGROUND SAMPLE (X) 54

TIME COLLECTED (24 HR CLOCK) 1124 (55 H M 5)

UNABLE TO COLLECT SAMPLE (see Instructions) 59

MONITOR POINT SAMPLED BY Q (60) (see Instructions) SS Scoop or Tube OTHER (SPECIFY)

SAMPLE FIELD FILTERED - INORGANICS (X) 61 ORGANICS (X) 62

SAMPLE APPEARANCE 63 Petroleum Soil Sand and Clay

COLLECTOR COMMENTS 103 from GWM Well Installation

RECEIVED AUG 13 1993 IEPA-DLPC 102 142

SPECIAL INSTRUCTIONS TO LAB TCLP - Metals

Chris Cahnovsky COLLECTED BY — CNC (143–145) INITIALS — DLPC/IEPA DIVISION OR COMPANY — UPS TRANSPORTED BY — DIVISION OR COMPANY

LAB USE ONLY

LAB SAMPLE NO. _____ LAB NAME _____ LAB ID NO. 146 — 149

DATE RECEIVED _____ AND ADDRESS _____

TIME RECEIVED _____

SAMPLE TEMP OKAY (Y/N) _____ SAMPLE PROPERLY PRESERVED (Y/N) _____ DATE COMPLETED _____ FORWARD _____

LAB COMMENTS 150 _____ 199

SUPERVISOR SIGNATURE

RECORD CODE L P C S M 0 2 (1–7) TRANS CODE A (8) (COLUMNS 9-29 FROM ABOVE)

| FIELD MEASUREMENTS CONSTITUENT DESCRIPTION AND REQUIRED UNIT OF MEASURE | STORET NUMBER | | | < OR > | VALUE | REPORTING LEVEL | |
|---|---|---|---|---|---|---|---|
| DEPTH TO WATER (ft. below LS) | 72019 (10–14) | (15) | (16) | (17) | (18) | (48) | (49) |
| ELEVATION OF GW SURFACE (ft. ref MSL) | 71993 | | | | | | |
| TOTAL WELL DEPTH (ft. below LS) | 72008 | | | | | | |
| pH (units) - Field | 00400 | | | | | | |
| SPEC CONDUCTANCE (umhos) - Field | 00094 | | | | | | |
| TEMP OF WATER SAMPLE (°F) - Field | 00011 | | | | | | |
| DEPTH TO btm. CASING FROM M.P. (ft.) | 72039 | | | | | | |
| DEPTH TO WATER FROM M.P. (ft.) | 72109 | | | | | | |
| ELEVATION btm. CASING, MSL (ft.) | 72020 | | | | | | |
| M.P. ELEVATION ABOVE L.S. (ft.) | 82515 | | | | | | |

RECORD CODE L P C S M 0 1 | TRANS CODE A

# ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
## DIVISION OF LAND POLLUTION CONTROL
## CHEMICAL ANALYSIS FORM



REPORT DUE DATE 36 M / D / Y 41

FEDERAL ID NUMBER I L D 0 4 1 8 8 9 0 3

SITE INVENTORY NUMBER 1 1 9 0 5 0 0 0 0 2 (9–18)

REGION 6 CO. Madison

Clark Oil + Refining Company

FACILITY NAME

MONITOR POINT NUMBER X 1 0 9 (19–22) (see Instructions)

DATE COLLECTED 0 8 / 0 5 / 9 3 (23 M D Y 28)

IEPA LAB (x or Blank) X (29) (see Instructions)

FOR IEPA USE ONLY

COMPLAINT NO.

DATE RECEIVED 42 M / D / Y 47

SAMPLING PURPOSE CODE 4 (48) (see Instructions)

TIME CARD PROGRAM CODE L P 4 1 (49–52) & UNIT CODE U (53)

BACKGROUND SAMPLE (X) 54

TIME COLLECTED (24 HR CLOCK) 1 1 2 9 (55 H M 5)

UNABLE TO COLLECT SAMPLE (see Instructions) 59

MONITOR POINT SAMPLED BY Q (60) (see Instructions) SS Scoop or Tube OTHER (SPECIFY)

SAMPLE FIELD FILTERED - INORGANICS (X) 61 ORGANICS (X) 62

SAMPLE APPEARANCE 63 Petroleum Soil Sand and Clay

COLLECTOR COMMENTS 103 from GWM well Installation

RECEIVED 102 AUG 13 1993 IEPA-DLPC 142

SPECIAL INSTRUCTIONS TO LAB TCLP - Metals

Chris Cahnovsky COLLECTED BY | CNC 143–145 INITIALS | DLPC/IEPA DIVISION OR COMPANY | UPS TRANSPORTED BY | DIVISION OR COMPANY

LAB USE ONLY

LAB SAMPLE NO. _____ LAB NAME _____ LAB ID NO. 146 — — 149

DATE RECEIVED _____ AND ADDRESS _____

TIME RECEIVED _____

SAMPLE TEMP OKAY (Y/N) SAMPLE PROPERLY PRESERVED (Y/N) DATE COMPLETED _____ FORWARD _____

LAB COMMENTS 150 _____ 199

SUPERVISOR SIGNATURE

RECORD CODE L P C S M 0 2 | TRANS CODE A (COLUMNS 9-29 FROM ABOVE)

| FIELD MEASUREMENTS CONSTITUENT DESCRIPTION AND REQUIRED UNIT OF MEASURE | STORET NUMBER | | | < OR > | VALUE | REPORTING LEVEL | |
|---|---|---|---|---|---|---|---|
| DEPTH TO WATER (ft. below LS) | 7 2 0 1 9 (10–14) | 15 | 16 | 17 | 18 . 47 | 48 | 49 |
| ELEVATION OF GW SURFACE (ft. ref MSL) | 7 1 9 9 3 | | | | . | | |
| TOTAL WELL DEPTH (ft. below LS) | 7 2 0 0 8 | | | | . | | |
| pH (units) - Field | 0 0 4 0 0 | | | | . | | |
| SPEC CONDUCTANCE (umhos) - Field | 0 0 0 9 4 | | | | . | | |
| TEMP OF WATER SAMPLE (°F) - Field | 0 0 0 1 1 | | | | . | | |
| DEPTH TO btm. CASING FROM M.P. (ft.) | 7 2 0 3 9 | | | | . | | |
| DEPTH TO WATER FROM M.P. (ft.) | 7 2 1 0 9 | | | | . | | |
| ELEVATION btm. CASING, MSL (ft.) | 7 2 0 2 0 | | | | . | | |

RECORD CODE L P C S M 0 1 (1–7) TRANS CODE A (8)

# ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
## DIVISION OF LAND POLLUTION CONTROL
## CHEMICAL ANALYSIS FORM



REPORT DUE DATE 36 M / D / Y 41

FEDERAL ID NUMBER I L D 0 4 1 8 8 9 0 2 3

SITE INVENTORY NUMBER 1 1 9 0 5 0 0 0 0 2 (9–18)

REGION 6 CO. Madison

Clark Oil + Refining Company
FACILITY NAME

MONITOR POINT NUMBER X 1 1 0 (19–22) (see Instructions)

DATE COLLECTED 0 8 / 0 5 / 9 3 (23 M D Y 28)

IEPA LAB (x or Blank) X (29) (see Instructions)

FOR IEPA USE ONLY — COMPLAINT NO.

DATE RECEIVED 42 M / D / Y 47

SAMPLING PURPOSE CODE 4 (48) (see Instructions)

TIME CARD PROGRAM CODE L P 4 1 (49–52) & UNIT CODE J (53)

BACKGROUND SAMPLE (X) 54

TIME COLLECTED (24 HR CLOCK) 1 1 . 3 6 (55 H M 5)

UNABLE TO COLLECT SAMPLE (see Instructions) 59

MONITOR POINT SAMPLED BY Q (60) (see Instructions) SS Scoop or Tube OTHER (SPECIFY)

SAMPLE FIELD FILTERED - INORGANICS (X) 61 ORGANICS (X) 62

SAMPLE APPEARANCE 63 Petroleum Soil Sand and Clay

COLLECTOR COMMENTS 103 from GWM Well Installation

RECEIVED AUG 13 1993 IEPA-DLPC 102 142

SPECIAL INSTRUCTIONS TO LAB TCLP - Metals

Chris Cahnovsky — COLLECTED BY; C N C (143–145) INITIALS; DLPC/IEPA — DIVISION OR COMPANY; UPS — TRANSPORTED BY; DIVISION OR COMPANY

LAB USE ONLY

LAB SAMPLE NO. _____ LAB NAME _____ LAB ID NO. 146 — 149

DATE RECEIVED _____ AND ADDRESS _____

TIME RECEIVED _____

SAMPLE TEMP OKAY (Y/N) SAMPLE PROPERLY PRESERVED (Y/N) DATE COMPLETED _____ FORWARD _____

LAB COMMENTS 150 _____ 199

SUPERVISOR SIGNATURE

RECORD CODE L P C S M 0 2 (1–7) TRANS CODE A (8) (COLUMNS 9-29 FROM ABOVE)

| FIELD MEASUREMENTS CONSTITUENT DESCRIPTION AND REQUIRED UNIT OF MEASURE | STORET NUMBER | | | < OR > | VALUE | REPORTING LEVEL | |
|---|---|---|---|---|---|---|---|
| DEPTH TO WATER (ft. below LS) | 7 2 0 1 9 (10–14) | (15) | (16) | (17) | (18–47) | (48) | (49) |
| ELEVATION OF GW SURFACE (ft. ref MSL) | 7 1 9 9 3 | | | | | | |
| TOTAL WELL DEPTH (ft. below LS) | 7 2 0 0 8 | | | | | | |
| pH (units) - Field | 0 0 4 0 0 | | | | | | |
| SPEC CONDUCTANCE (umhos) - Field | 0 0 0 9 4 | | | | | | |
| TEMP OF WATER SAMPLE (°F) - Field | 0 0 0 1 1 | | | | | | |
| DEPTH TO btm. CASING FROM M.P. (ft.) | 7 2 0 3 9 | | | | | | |
| DEPTH TO WATER FROM M.P. (ft.) | 7 2 1 0 9 | | | | | | |
| ELEVATION btm. CASING, MSL (ft.) | 7 2 0 2 0 | | | | | | |
| M.P. ELEVATION ABOVE L.S. (ft.) | 8 2 5 1 5 | | | | | | |

RECORD CODE L P C S M 0 1 (1–7) TRANS CODE A (8)

# ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
## DIVISION OF LAND POLLUTION CONTROL
## CHEMICAL ANALYSIS FORM



REPORT DUE DATE 36 M / D / Y 41

FEDERAL ID NUMBER I L D 0 4 1 8 8 9 0 3

SITE INVENTORY NUMBER 1 1 9 0 5 0 0 0 0 2 (9–18)

REGION 6 CO. Madison

Clark Oil + Refining Company
FACILITY NAME

MONITOR POINT NUMBER X 1 1 1 (19–22) (see Instructions)

DATE COLLECTED 0 8 0 5 9 3 (23 M D Y 28)

IEPA LAB (x or Blank) X (29) (see Instructions)

FOR IEPA USE ONLY — COMPLAINT NO.

DATE RECEIVED 42 M / D / Y 47

SAMPLING PURPOSE CODE 4 (48) (see Instructions)

TIME CARD PROGRAM CODE L P 4 1 (49–52) & UNIT CODE J (53)

BACKGROUND SAMPLE (X) 54

TIME COLLECTED (24 HR CLOCK) 1 1 4 3 (55 H M 5)

UNABLE TO COLLECT SAMPLE (see Instructions) 59

MONITOR POINT SAMPLED BY Q (60) (see Instructions) SS Scoop or Tube OTHER (SPECIFY)

SAMPLE FIELD FILTERED - INORGANICS (X) 61 ORGANICS (X) 62

SAMPLE APPEARANCE 63 Petroleum Soil Sand and Clay

COLLECTOR COMMENTS 103 from GWM well Installation

~~RECEIVED~~ AUG 13 1993 ~~IEPA-DLPC~~ 102 142

SPECIAL INSTRUCTIONS TO LAB TCLP - Metals

| Chris Cahnovsky | CNC | DLPC/IEPA | UPS | |
|---|---|---|---|---|
| COLLECTED BY | INITIALS 143 145 | DIVISION OR COMPANY | TRANSPORTED BY | DIVISION OR COMPANY |

LAB USE ONLY

LAB SAMPLE NO. _____ LAB NAME _____ LAB ID NO. 146 — — 149

DATE RECEIVED _____ AND ADDRESS _____

TIME RECEIVED _____

SAMPLE TEMP OKAY (Y/N) SAMPLE PROPERLY PRESERVED (Y/N) DATE COMPLETED _____ FORWARD _____

LAB COMMENTS 150 _____ 199

SUPERVISOR SIGNATURE

RECORD CODE L P C S M 0 2 (1–7) TRANS CODE A (8) (COLUMNS 9-29 FROM ABOVE)

| FIELD MEASUREMENTS CONSTITUENT DESCRIPTION AND REQUIRED UNIT OF MEASURE | STORET NUMBER | | | < OR > | VALUE | REPORTING LEVEL | |
|---|---|---|---|---|---|---|---|
| DEPTH TO WATER (ft. below LS) | 7 2 0 1 9 (10–14) | 15 | 16 | 17 | 18 . 17 | 48 | 49 |
| ELEVATION OF GW SURFACE (ft. ref MSL) | 7 1 9 9 3 | | | | . | | |
| TOTAL WELL DEPTH (ft. below LS) | 7 2 0 0 8 | | | | . | | |
| pH (units) - Field | 0 0 4 0 0 | | | | . | | |
| SPEC CONDUCTANCE (umhos) - Field | 0 0 0 9 4 | | | | . | | |
| TEMP OF WATER SAMPLE (°F) - Field | 0 0 0 1 1 | | | | . | | |
| DEPTH TO btm. CASING FROM M.P. (ft.) | 7 2 0 3 9 | | | | . | | |
| DEPTH TO WATER FROM M.P. (ft.) | 7 2 1 0 9 | | | | . | | |
| ELEVATION btm. CASING, MSL (ft.) | 7 2 0 2 0 | | | | . | | |

RECORD CODE L P C S M 0 1 (1–7) TRANS CODE A (8)

# ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
## DIVISION OF LAND POLLUTION CONTROL
## CHEMICAL ANALYSIS FORM



REPORT DUE DATE 36 M / D / Y 41

FEDERAL ID NUMBER ILD041889023

SITE INVENTORY NUMBER 119050002 (9–18)

REGION 6 CO. Madison

Clark Oil - Refining Company
FACILITY NAME

MONITOR POINT NUMBER X112 (19–22) (see Instructions)

DATE COLLECTED 08/05/93 (23 M D Y 28)

IEPA LAB (x or Blank) X (29) (see Instructions)

FOR IEPA USE ONLY

COMPLAINT NO.

DATE RECEIVED 42 M / D / Y 47

SAMPLING PURPOSE CODE 4 (48) (see Instructions)

TIME CARD PROGRAM CODE LP41 (49–52) & UNIT CODE J (53)

BACKGROUND SAMPLE (X) 54

TIME COLLECTED (24 HR CLOCK) 11:52 (55 H M 5)

UNABLE TO COLLECT SAMPLE (see Instructions) 59

MONITOR POINT SAMPLED BY Q (60) (see Instructions) SS Scoop or Tube OTHER (SPECIFY)

SAMPLE FIELD FILTERED - INORGANICS (X) 61 ORGANICS (X) 62

SAMPLE APPEARANCE 63 Petroleum Soil Sand and Clay

COLLECTOR COMMENTS 103 from GWM Well Installation

RECEIVED AUG 13 1993 102 IEPA-DLPC 142

SPECIAL INSTRUCTIONS TO LAB TCLP - Metals

Chris Cahnovsky COLLECTED BY | CNC 143 INITIALS 145 | DLPC/IEPA DIVISION OR COMPANY | UPS TRANSPORTED BY | DIVISION OR COMPANY

LAB USE ONLY

LAB SAMPLE NO. _____ LAB NAME _____ LAB ID NO. 146 — 149

DATE RECEIVED _____ AND ADDRESS _____

TIME RECEIVED _____

SAMPLE TEMP OKAY (Y/N) _____ SAMPLE PROPERLY PRESERVED (Y/N) _____ DATE COMPLETED _____ FORWARD _____

LAB COMMENTS 150 _____ 199

SUPERVISOR SIGNATURE

RECORD CODE L P C S M 0 2 (1–7) TRANS CODE A (8) (COLUMNS 9-29 FROM ABOVE)

| FIELD MEASUREMENTS CONSTITUENT DESCRIPTION AND REQUIRED UNIT OF MEASURE | STORET NUMBER | | | < OR > | VALUE | REPORTING LEVEL | |
|---|---|---|---|---|---|---|---|
| DEPTH TO WATER (ft. below LS) | 72019 (10–14) | 15 | 16 | 17 | 18 — 41 | 48 | 49 |
| ELEVATION OF GW SURFACE (ft. ref MSL) | 71993 | | | | | | |
| TOTAL WELL DEPTH (ft. below LS) | 72008 | | | | | | |
| pH (units) - Field | 00400 | | | | | | |
| SPEC CONDUCTANCE (umhos) - Field | 00094 | | | | | | |
| TEMP OF WATER SAMPLE (°F) - Field | 00011 | | | | | | |
| DEPTH TO btm. CASING FROM M.P. (ft.) | 72039 | | | | | | |
| DEPTH TO WATER FROM M.P. (ft.) | 72109 | | | | | | |
| ELEVATION btm. CASING, MSL (ft.) | 72020 | | | | | | |
| M.P. ELEVATION ABOVE L.S. (ft.) | 82515 | | | | | | |

RECORD CODE L P C S M 0 1 | TRANS CODE A

# ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
## DIVISION OF LAND POLLUTION CONTROL
## CHEMICAL ANALYSIS FORM



REPORT DUE DATE 36 M / D / Y 41

FEDERAL ID NUMBER ILD041889 0 3

SITE INVENTORY NUMBER 1 1 9 0 5 0 0 0 0 2 (9–18)

REGION 6 CO. Madison

Clark Oil - Refining Company
FACILITY NAME

MONITOR POINT NUMBER X 1 1 3 (19–22) (see Instructions)

DATE COLLECTED 0 8 / 0 5 / 9 3 (23 M D Y 25)

IEPA LAB (x or Blank) X (29) (see Instructions)

FOR IEPA USE ONLY

COMPLAINT NO.

DATE RECEIVED 42 M / D / Y 47

SAMPLING PURPOSE CODE 4 (48) (see Instructions)

TIME CARD PROGRAM CODE L P 4 1 (49–52) & UNIT CODE U (53)

BACKGROUND SAMPLE (X) 54

TIME COLLECTED (24 HR CLOCK) 1 2 . 0 5 (55 H M 5)

UNABLE TO COLLECT SAMPLE (see Instructions) 59

MONITOR POINT SAMPLED BY Q (60) (see Instructions) SS Scoop or Tube OTHER (SPECIFY)

SAMPLE FIELD FILTERED - INORGANICS (X) 61 ORGANICS (X) 62

SAMPLE APPEARANCE 63 Petroleum Soil Sand and Clay

COLLECTOR COMMENTS 103 from GWM Well Installation

RECEIVED AUG 13 1993 IEPA-DLPC 102 142

SPECIAL INSTRUCTIONS TO LAB TCLP - Metals

Chris Cahnovsky COLLECTED BY | CNC 143 145 INITIALS | DLPC/IEPA DIVISION OR COMPANY | UPS TRANSPORTED BY | DIVISION OR COMPANY

LAB USE ONLY

LAB SAMPLE NO. _____ LAB NAME _____ LAB ID NO. 146 — — 149

DATE RECEIVED _____ AND ADDRESS _____

TIME RECEIVED _____

SAMPLE TEMP OKAY (Y/N) SAMPLE PROPERLY PRESERVED (Y/N) DATE COMPLETED _____ FORWARD _____

LAB COMMENTS 150 _____ 199

SUPERVISOR SIGNATURE

RECORD CODE L P C S M 0 2 | TRANS CODE A (COLUMNS 9-29 FROM ABOVE)

| FIELD MEASUREMENTS CONSTITUENT DESCRIPTION AND REQUIRED UNIT OF MEASURE | STORET NUMBER | | | < OR > | VALUE | REPORTING LEVEL | |
|---|---|---|---|---|---|---|---|
| DEPTH TO WATER (ft. below LS) | 7 2 0 1 9 (10–24) | 35 | 36 | 37 | 38 . 39 | 48 | 49 |
| ELEVATION OF GW SURFACE (ft. ref MSL) | 7 1 9 9 3 | | | | . | | |
| TOTAL WELL DEPTH (ft. below LS) | 7 2 0 0 8 | | | | . | | |
| pH (units) - Field | 0 0 4 0 0 | | | | . | | |
| SPEC CONDUCTANCE (umhos) - Field | 0 0 0 9 4 | | | | . | | |
| TEMP OF WATER SAMPLE (°F) - Field | 0 0 0 1 1 | | | | . | | |
| DEPTH TO btm. CASING FROM M.P.(ft.) | 7 2 0 3 9 | | | | . | | |
| DEPTH TO WATER FROM M.P. (ft.) | 7 2 1 0 9 | | | | . | | |
| ELEVATION btm. CASING, MSL (ft.) | 7 2 0 2 0 | | | | . | | |

RECEIVED
AUG 13 1993
IEPA-DLPC

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF LAND POLLUTION CONTROL
CHAIN OF CUSTODY

I certify that the samples listed below were collected in my presence and that each sample bottle was sealed intact by me and that I wrote my initials and the date on the seal of each bottle.

Site Inventory No. 1190500002 County Madison

Federal I.D. No. ILD041889023 Clark Oil & Refining Corp.
(Facility Name)

SAMPLING TEAM

| Sample No. | Initials | Consisting of the Indicated No. of Bottles | Date Collected | Time Sealed |
|---|---|---|---|---|
| Y101 | [illegible] | 2 | 8/5/93 | 10:29 AM/PM |
| Y102 | [illegible] | 2 | | 10:40 AM/PM |
| Y103 | [illegible] | 2 | | 10:53 AM/PM |
| Y104 | [illegible] | 2 | | 10:59 AM/PM |
| Y105 | [illegible] | 2 | | 11:05 AM/PM |
| Y106 | [illegible] | 2 | | 11:11 AM/PM |
| Y107 | [illegible] | 2 | | 11:17 AM/PM |
| Y108 | [illegible] | 2 | | 11:25 AM/PM |
| Y109 | [illegible] | 2 | | 11:30 AM/PM |
| Y110 | [illegible] | 2 | | 11:37 AM/PM |

Sealer's Signature [illegible] Date 8/5/93 Time 2:08 AM/PM

Sampler(s) Chris Cahnovsky Connie Letsky Doug Hayward

CARRIERS

I certify I received the above samples, with each seal on each bottle intact and the sealer's initials written on each sample seal.

| Relinquished By (Signature) | Date | Time | Received By (Signature) | Date | Time |
|---|---|---|---|---|---|
| [illegible] | 8/5/93 | 3:30 AM/PM | UPS | 8/5/93 | 3:30 AM/PM |
| | | AM/PM | | | AM/PM |
| | | AM/PM | | | AM/PM |
| | | AM/PM | | | AM/PM |
| | | AM/PM | | | AM/PM |
| | | AM/PM | | | AM/PM |
| | | AM/PM | | | AM/PM |

LAB STODIAN

I certify I received the above samples with each seal on each bottle intact, and the sealer's initials written on each sample seal. After recording these samples in the official record book, these same samples will be in the custody of competent laboratory personnel at all times or locked in a secured area.

Signature _____ Date _____ Time _____ A.M. P.M.

Lab Location _____ (City)

RECEIVED
AUG 13 1993
IEPA-DLPC

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF LAND POLLUTION CONTROL
CHAIN OF CUSTODY

I certify that the samples listed below were collected in my presence and that each sample bottle was sealed intact by me and that I wrote my initials and the date on the seal of each bottle.

Site Inventory No. 1190500002 County Madison

Federal I.D. No. ILD041889023 Clark Oil & Refining Corp.
(Facility Name)

SAMPLING TEAM

| Sample No. | Initials | Consisting of the Indicated No. of Bottles | Date Collected | Time Sealed |
|---|---|---|---|---|
| X111 | [illegible] | 2 | 8/5/93 | 11:45 AM/PM |
| X112 | [illegible] | 2 | | 11:55 AM/PM |
| X113 | [illegible] | 2 | | 12:06 AM/PM |
| | | | | AM/PM |
| | | | | AM/PM |
| | | | | AM/PM |
| | | | | AM/PM |
| | | | | AM/PM |
| | | | | AM/PM |
| | | | | AM/PM |

Sealer's Signature [signature] Date 8/5/93 Time 2:08 AM/PM

Sampler(s) [signature] Ronnie Letsky [signature]

CARRIERS

I certify I received the above samples, with each seal on each bottle intact and the sealer's initials written on each sample seal.

| Relinquished By (Signature) | Date | Time | Received By (Signature) | Date | Time |
|---|---|---|---|---|---|
| [signature] | 8/5/93 | 3:30 AM/PM | UPS | 8/5/93 | 3:30 AM/PM |
| | | AM/PM | | | AM/PM |
| | | AM/PM | | | AM/PM |
| | | AM/PM | | | AM/PM |
| | | AM/PM | | | AM/PM |
| | | AM/PM | | | AM/PM |
| | | AM/PM | | | AM/PM |

LAB CUSTODIAN

I certify I received the above samples with each seal on each bottle intact, and the sealer's initials written on each sample seal. After recording these samples in the official record book, these same samples will be in the custody of competent laboratory personnel at all times or locked in a secured area.

Signature _____ Date _____ Time _____ A.M. P.M.

Lab Location _____ (City)

IL 532-1147
LPC 141 9/83

120-011

RECORD CODE L P C S M 0 1 (1–7) TRANS CODE A (8)

# ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
## DIVISION OF LAND POLLUTION CONTROL
## CHEMICAL ANALYSIS FORM



REPORT DUE DATE 36 M / D / Y 41

FEDERAL ID NUMBER I L D 0 4 1 8 8 9 0 2 3

SITE INVENTORY NUMBER 1 1 9 0 5 0 0 0 0 2 (9–18)

REGION 6 CO. Madison

Clark Oil - Refining Company
FACILITY NAME

MONITOR POINT NUMBER X 1 0 1 (19–22) (see Instructions)

DATE COLLECTED 0 8 / 0 5 / 9 3 (23 M D Y 28)

IEPA LAB (x or Blank) X (29) (see Instructions)

FOR IEPA USE ONLY — COMPLAINT NO.

DATE RECEIVED 42 M / D / Y 47

SAMPLING PURPOSE CODE 4 (48) (see Instructions)

TIME CARD PROGRAM CODE L P 4 1 (49–52) & UNIT CODE J (53)

BACKGROUND SAMPLE (X) 54

TIME COLLECTED (24 HR CLOCK) 1 0 : 2 7 (55 H M 58)

UNABLE TO COLLECT SAMPLE (see Instructions) 59

MONITOR POINT SAMPLED BY Q (60) (see Instructions) SS Scoop or Tube OTHER (SPECIFY)

SAMPLE FIELD FILTERED - INORGANICS (X) 61 ORGANICS (X) 62

SAMPLE APPEARANCE 63 Petroleum Soil Sand and Clay 102

COLLECTOR COMMENTS 103 Soil from GWM Well Installation 142

SPECIAL INSTRUCTIONS TO LAB TCLP - Volatile Organic esp. Benzene

Chris Cahnovsky (COLLECTED BY) C N C (143–145) INITIALS — DLPC/IEPA (DIVISION OR COMPANY) — UPS (TRANSPORTED BY) — DIVISION OR COMPANY

RECEIVED AUG 13 1993 IEPA DLPC

LAB USE ONLY

LAB SAMPLE NO. ____ LAB NAME ____ LAB ID NO. 146 — 149

DATE RECEIVED ____ AND ADDRESS ____

TIME RECEIVED ____

SAMPLE TEMP OKAY (Y/N) ____ SAMPLE PROPERLY PRESERVED (Y/N) ____ DATE COMPLETED ____ FORWARD ____

LAB COMMENTS 150 ____ 199

SUPERVISOR SIGNATURE

RECORD CODE L P C S M 0 2 (1–7) TRANS CODE A (8) (COLUMNS 9-29 FROM ABOVE)

| FIELD MEASUREMENTS CONSTITUENT DESCRIPTION AND REQUIRED UNIT OF MEASURE | STORET NUMBER | | | < OR > | VALUE | REPORTING LEVEL | |
|---|---|---|---|---|---|---|---|
| DEPTH TO WATER (ft. below LS) | 7 2 0 1 9 (10–14) | (15) | (16) | (17) | (18–21) | (48) | (49) |
| ELEVATION OF GW SURFACE (ft. ref MSL) | 7 1 9 9 3 | | | | | | |
| TOTAL WELL DEPTH (ft. below LS) | 7 2 0 0 8 | | | | | | |
| pH (units) - Field | 0 0 4 0 0 | | | | | | |
| SPEC CONDUCTANCE (umhos) - Field | 0 0 0 9 4 | | | | | | |
| TEMP OF WATER SAMPLE (°F) - Field | 0 0 0 1 1 | | | | | | |
| DEPTH TO btm. CASING FROM M.P. (ft.) | 7 2 0 3 9 | | | | | | |
| DEPTH TO WATER FROM M.P. (ft.) | 7 2 1 0 9 | | | | | | |
| ELEVATION btm. CASING, MSL (ft.) | 7 2 0 2 0 | | | | | | |
| M.P. ELEVATION ABOVE L.S. (ft.) | 8 2 5 1 5 | | | | | | |

L P C S M 0 1 A

# DIVISION OF LAND POLLUTION CONTROL
# CHEMICAL ANALYSIS FORM



REPORT DUE DATE 36 M / D / Y 41

FEDERAL ID NUMBER ILD041889023

SITE INVENTORY NUMBER 119050000 2 (9–18)

REGION 6 CO. Madison

Clark Oil - Refining Company

FACILITY NAME

MONITOR POINT NUMBER X102 (19–22) (see Instructions)

DATE COLLECTED 04/05/93 (23 M D Y 28)

IEPA LAB (x or Blank) X (29) (see Instructions)

FOR IEPA USE ONLY

COMPLAINT NO.

DATE RECEIVED 42 M / D / Y 47

SAMPLING PURPOSE CODE 4 (48) (see Instructions)

TIME CARD PROGRAM CODE LP41 (49–52) & UNIT CODE J (53)

BACKGROUND SAMPLE (X) 54

TIME COLLECTED (24 HR CLOCK) 10.39 (55 H M 5)

UNABLE TO COLLECT SAMPLE (see Instructions) 59

MONITOR POINT SAMPLED BY (see Instructions) Q (60) SS Scoop & Tube OTHER (SPECIFY)

SAMPLE FIELD FILTERED - INORGANICS (X) 61 ORGANICS (X) 62

SAMPLE APPEARANCE 64 Petroleum Soil Sand and Clay 102

COLLECTOR COMMENTS 103 Soil from GWM Well Installation 142

SPECIAL INSTRUCTIONS TO LAB TCLP - Volatile Organic esp. Benzene

Chris Cahnovsky (COLLECTED BY) CNC (INITIALS) DLPC/IEPA (DIVISION OR COMPANY) UPS (TRANSPORTED BY) (DIVISION OR COMPANY)

LAB USE ONLY

RECEIVED AUG 13 1993 IEPA-DLPC

LAB SAMPLE NO. LAB NAME LAB ID NO. 146 149

DATE RECEIVED AND ADDRESS

TIME RECEIVED

SAMPLE TEMP OKAY (Y/N) SAMPLE PROPERLY PRESERVED (Y/N) DATE COMPLETED FORWARD

LAB COMMENTS 150 199

SUPERVISOR SIGNATURE

RECORD CODE L P C S M 0 2 TRANS CODE A (COLUMNS 9-29 FROM ABOVE)

| FIELD MEASUREMENTS CONSTITUENT DESCRIPTION AND REQUIRED UNIT OF MEASURE | STORET NUMBER | | | < OR > | VALUE | REPORTING LEVEL | |
|---|---|---|---|---|---|---|---|
| DEPTH TO WATER (ft. below LS) | 72019 | | | | | | |
| ELEVATION OF GW SURFACE (ft. ref MSL) | 71993 | | | | | | |
| TOTAL WELL DEPTH (ft. below LS) | 72008 | | | | | | |
| pH (units) - Field | 00400 | | | | | | |
| SPEC CONDUCTANCE (umhos) - Field | 00094 | | | | | | |
| TEMP OF WATER SAMPLE (°F) - Field | 00011 | | | | | | |
| DEPTH TO btm. CASING FROM M.P. (ft.) | 72039 | | | | | | |
| DEPTH TO WATER FROM M.P. (ft.) | 72109 | | | | | | |
| ELEVATION btm. CASING, MSL (ft.) | 72020 | | | | | | |
| M.P. ELEVATION ABOVE L.S. (ft.) | 82515 | | | | | | |

L P C S M 0 1 A

# DIVISION OF LAND POLLUTION CONTROL
# CHEMICAL ANALYSIS FORM



REPORT DUE DATE 36 M / D / Y 41

FEDERAL ID NUMBER I L D 0 4 1 8 8 9 0 2 3

SITE INVENTORY NUMBER 1 1 9 0 5 0 0 0 0 2 (9–18)

MONITOR POINT NUMBER X 1 0 3 (19–22) (see Instructions)

REGION 6 CO. Madison

DATE COLLECTED 0 8 / 0 5 / 9 3 (23 M D Y 28)

Clark Oil + Refining Company
FACILITY NAME

IEPA LAB (x or Blank) X (see Instructions) (29)

FOR IEPA USE ONLY — COMPLAINT NO.

DATE RECEIVED 42 M / D / Y 47

SAMPLING PURPOSE CODE 4 (48) (see Instructions)

TIME CARD PROGRAM CODE L P 4 1 (49–52) & UNIT CODE U (53)

BACKGROUND SAMPLE (X) 54

TIME COLLECTED (24 HR CLOCK) 1 0 : 5 2 (55 H M 5)

UNABLE TO COLLECT SAMPLE (see Instructions) 59

MONITOR POINT SAMPLED BY Q (60) (see Instructions) SS Scoop or Tube OTHER (SPECIFY)

SAMPLE FIELD FILTERED - INORGANICS (X) 61 ORGANICS (X) 62

SAMPLE APPEARANCE 63 Petroleum Soil Sand and Clay 102

COLLECTOR COMMENTS 103 Soil from GWM Well Installation 142

SPECIAL INSTRUCTIONS TO LAB TCLP - Volatile Organic esp. Benzene

Chris Cahnovsky C N C (141–145) DLPC/IEPA UPS
COLLECTED BY INITIALS DIVISION OR COMPANY TRANSPORTED BY DIVISION OR COMPANY

LAB USE ONLY

LAB SAMPLE NO. LAB NAME LAB ID NO. 146 149

DATE RECEIVED AND ADDRESS

TIME RECEIVED

SAMPLE TEMP OKAY (Y/N) SAMPLE PROPERLY PRESERVED (Y/N) DATE COMPLETED FORWARD

LAB COMMENTS 150 199

RECEIVED
AUG 13 1993
IEPA-DLPC

SUPERVISOR SIGNATURE

RECORD CODE L P C S M 0 2 TRANS CODE A (COLUMNS 9-29 FROM ABOVE)

| FIELD MEASUREMENTS CONSTITUENT DESCRIPTION AND REQUIRED UNIT OF MEASURE | STORET NUMBER | | | < OR > | VALUE | REPORTING LEVEL | |
|---|---|---|---|---|---|---|---|
| DEPTH TO WATER (ft. below LS) | 7 2 0 1 9 (10–14) | (15) | (16) | (17) | (18–41) | (48) | (49) |
| ELEVATION OF GW SURFACE (ft. ref MSL) | 7 1 9 9 3 | | | | | | |
| TOTAL WELL DEPTH (ft. below LS) | 7 2 0 0 8 | | | | | | |
| pH (units) - Field | 0 0 4 0 0 | | | | | | |
| SPEC CONDUCTANCE (umhos) - Field | 0 0 0 9 4 | | | | | | |
| TEMP OF WATER SAMPLE (°F) - Field | 0 0 0 1 1 | | | | | | |
| DEPTH TO btm. CASING FROM M.P. (ft.) | 7 2 0 3 9 | | | | | | |
| DEPTH TO WATER FROM M.P. (ft.) | 7 2 1 0 9 | | | | | | |
| ELEVATION btm. CASING, MSL (ft.) | 7 2 0 2 0 | | | | | | |
| M.P. ELEVATION ABOVE L.S. (ft.) | 8 2 5 1 5 | | | | | | |

This agency is authorized to require this information under Illinois Revised Statutes, 1979, Chapter 111 1/2, Section 1004 and 1021. Disclosure of this information is required. Failure to do so may result in a civil

L | P | C | S | M | 0 | 1 (CODE 1–7)   A (CODE 8)

# DIVISION OF LAND POLLUTION CONTROL
# CHEMICAL ANALYSIS FORM



REPORT DUE DATE __ M __ D __ Y (36–41)

FEDERAL ID NUMBER ILD041889023

SITE INVENTORY NUMBER 1190500002
REGION 6   CO. Madison
Clark Oil + Refining Company
FACILITY NAME

MONITOR POINT NUMBER X104
(see Instructions)
DATE COLLECTED 08/05/93
IEPA LAB (x or Blank) X
(see Instructions)

FOR IEPA USE ONLY   COMPLAINT NO. ______
DATE RECEIVED __ M __ D __ Y
SAMPLING PURPOSE CODE 4
(see Instructions)
TIME CARD PROGRAM CODE LP41 & UNIT CODE J

BACKGROUND SAMPLE (X) ___
TIME COLLECTED (24 HR CLOCK) 10:58
UNABLE TO COLLECT SAMPLE (see Instructions) ___
MONITOR POINT SAMPLED BY Q   SS Scoop a Tube
(see Instructions)   OTHER (SPECIFY)
SAMPLE FIELD FILTERED - INORGANICS (X) ___   ORGANICS (X) ___

SAMPLE APPEARANCE Petroleum Soil Sand and Clay
COLLECTOR COMMENTS Soil from GWM Well Installation
SPECIAL INSTRUCTIONS TO LAB TCLP - Volatile Organic esp. Benzene

Chris Cahnovsky — COLLECTED BY
CNC — INITIALS
DLPC/IEPA — DIVISION OR COMPANY
UPS — TRANSPORTED BY
___ — DIVISION OR COMPANY

LAB USE ONLY

RECEIVED
AUG 13 1993
IEPA-DLPC

LAB SAMPLE NO. ______   LAB NAME AND ADDRESS ______   LAB ID NO. ______
DATE RECEIVED ______
TIME RECEIVED ______
SAMPLE TEMP OKAY (Y/N) ___   SAMPLE PROPERLY PRESERVED (Y/N) ___   DATE COMPLETED ______   FORWARD ______
LAB COMMENTS ______

SUPERVISOR SIGNATURE ______

RECORD CODE L | P | C | S | M | 0 | 2   TRANS CODE A   (COLUMNS 9-29 FROM ABOVE)

| FIELD MEASUREMENTS CONSTITUENT DESCRIPTION AND REQUIRED UNIT OF MEASURE | STORET NUMBER | | | < OR > | VALUE | REPORTING LEVEL | |
|---|---|---|---|---|---|---|---|
| DEPTH TO WATER (ft. below LS) | 72019 | | | | | | |
| ELEVATION OF GW SURFACE (ft. ref MSL) | 71993 | | | | | | |
| TOTAL WELL DEPTH (ft. below LS) | 72008 | | | | | | |
| pH (units) - Field | 00400 | | | | | | |
| SPEC CONDUCTANCE (umhos) - Field | 00094 | | | | | | |
| TEMP OF WATER SAMPLE (°F) - Field | 00011 | | | | | | |
| DEPTH TO btm. CASING FROM M.P. (ft.) | 72039 | | | | | | |
| DEPTH TO WATER FROM M.P. (ft.) | 72109 | | | | | | |
| ELEVATION btm. CASING, MSL (ft.) | 72020 | | | | | | |
| M.P. ELEVATION ABOVE L.S. (ft.) | 82515 | | | | | | |

L P C S M 0 1 A

# DIVISION OF LAND POLLUTION CONTROL
# CHEMICAL ANALYSIS FORM



REPORT DUE DATE 36 M / D / Y 41

FEDERAL ID NUMBER ILD041889023

SITE INVENTORY NUMBER 1 1 9 0 5 0 0 0 0 2 (9–18)

MONITOR POINT NUMBER X 1 0 5 (19–22) (see Instructions)

REGION 6 CO. Madison

DATE COLLECTED 08/05/93 (23 M D Y 28)

Clark Oil - Refining Company
FACILITY NAME

IEPA LAB (x or Blank) X (29) (see Instructions)

FOR IEPA USE ONLY — COMPLAINT NO.

DATE RECEIVED 42 M / D / Y 47

SAMPLING PURPOSE CODE 4 (48) (see Instructions)

TIME CARD PROGRAM CODE LP 41 (49–52) & UNIT CODE J (53)

BACKGROUND SAMPLE (X) 54

TIME COLLECTED (24 HR CLOCK) 11:04 (55 H M 5)

UNABLE TO COLLECT SAMPLE (see Instructions) 59

MONITOR POINT SAMPLED BY Q (60) (see Instructions) SS Scoop or Tube OTHER (SPECIFY)

SAMPLE FIELD FILTERED - INORGANICS (X) 61 ORGANICS (X) 62

SAMPLE APPEARANCE 64 Petroleum Soil Sand and Clay 102

COLLECTOR COMMENTS 103 Soil from GWM Well Installation 142

SPECIAL INSTRUCTIONS TO LAB TCLP - Volatile Organic esp. Benzene

Chris Cahnovsky (COLLECTED BY) CNC (INITIALS) DLPC/IEPA (DIVISION OR COMPANY) UPS (TRANSPORTED BY) (DIVISION OR COMPANY)

LAB USE ONLY

LAB SAMPLE NO. LAB NAME LAB ID NO. 146 149

DATE RECEIVED AND ADDRESS

TIME RECEIVED

SAMPLE TEMP OKAY (Y/N) SAMPLE PROPERLY PRESERVED (Y/N) DATE COMPLETED FORWARD

LAB COMMENTS 150 199

RECEIVED
AUG 13 1993
IEPA-DLPC

SUPERVISOR SIGNATURE

RECORD CODE L P C S M 0 2 TRANS CODE A (COLUMNS 9-29 FROM ABOVE)

| FIELD MEASUREMENTS CONSTITUENT DESCRIPTION AND REQUIRED UNIT OF MEASURE | STORET NUMBER | | | < OR > | VALUE | REPORTING LEVEL | |
|---|---|---|---|---|---|---|---|
| DEPTH TO WATER (ft. below LS) | 72019 | | | | | | |
| ELEVATION OF GW SURFACE (ft. ref MSL) | 71993 | | | | | | |
| TOTAL WELL DEPTH (ft. below LS) | 72008 | | | | | | |
| pH (units) - Field | 00400 | | | | | | |
| SPEC CONDUCTANCE (umhos) - Field | 00094 | | | | | | |
| TEMP OF WATER SAMPLE (°F) - Field | 00011 | | | | | | |
| DEPTH TO btm. CASING FROM M.P. (ft.) | 72039 | | | | | | |
| DEPTH TO WATER FROM M.P. (ft.) | 72109 | | | | | | |
| ELEVATION btm. CASING, MSL (ft.) | 72020 | | | | | | |
| M.P. ELEVATION ABOVE L.S. (ft.) | 82515 | | | | | | |

This agency is authorized to require this information under Illinois Revised Statutes 1979 Chapter 111 1/2 Section 1004 and 1021. Disclosure of this information is required. Failure to do so may result in a civil

L P C S M 0 1 (1–7) | A (8)

# DIVISION OF LAND POLLUTION CONTROL
# CHEMICAL ANALYSIS FORM



REPORT DUE DATE (36) M / D / Y (41)

FEDERAL ID NUMBER I L D 0 4 1 8 8 9 0 2 3

SITE INVENTORY NUMBER 1 1 9 0 5 0 0 0 0 2 (9–18)

MONITOR POINT NUMBER X 1 0 6 (19–22) (see Instructions)

REGION 6 CO. Madison

DATE COLLECTED 0 8 / 0 5 / 9 3 (23 M, D, Y 25)

Clark Oil & Refining Company
FACILITY NAME

IEPA LAB (x or Blank) X (29) (see Instructions)

FOR IEPA USE ONLY — COMPLAINT NO. _____

DATE RECEIVED (42) M / D / Y (47)

SAMPLING PURPOSE CODE 4 (48) (see Instructions)

TIME CARD PROGRAM CODE L P 4 1 (49–52) & UNIT CODE J (53)

BACKGROUND SAMPLE (X) (54)

TIME COLLECTED (24 HR CLOCK) 1 1 : 1 1 (55 H M 58)

UNABLE TO COLLECT SAMPLE (59) (see Instructions)

MONITOR POINT SAMPLED BY Q (60) (see Instructions) — SS Scoop or Tube (OTHER (SPECIFY))

SAMPLE FIELD FILTERED - INORGANICS (X) (61) ORGANICS (X) (62)

SAMPLE APPEARANCE (64) Petroleum Soil Sand and Clay (102)

COLLECTOR COMMENTS (103) Soil from Gw Well Installation (142)

SPECIAL INSTRUCTIONS TO LAB TCLP - Volatile Organic esp. Benzene

Chris Ashnovsky (145) — INITIALS C N C (195) — COLLECTED BY

DLPC/IEPA — DIVISION OR COMPANY

UPS — TRANSPORTED BY

DIVISION OR COMPANY

LAB USE ONLY

RECEIVED
AUG 13 1993
IEPA-DLPC

LAB SAMPLE NO. _____ LAB NAME _____ LAB ID NO. (146–149)

DATE RECEIVED _____ AND ADDRESS _____

TIME RECEIVED _____

SAMPLE TEMP OKAY (Y/N) _____ SAMPLE PROPERLY PRESERVED (Y/N) _____ DATE COMPLETED _____ FORWARD _____

LAB COMMENTS (150) _____ (199)

SUPERVISOR SIGNATURE

RECORD CODE L P C S M 0 2 (1–7) TRANS CODE A (8) (COLUMNS 9-29 FROM ABOVE)

| FIELD MEASUREMENTS CONSTITUENT DESCRIPTION AND REQUIRED UNIT OF MEASURE | STORET NUMBER | | | < OR > | VALUE | REPORTING LEVEL | |
|---|---|---|---|---|---|---|---|
| DEPTH TO WATER (ft. below LS) | 7 2 0 1 9 (1–5) | (15) | (16) | (17) | (18) | (18) | (19) |
| ELEVATION OF GW SURFACE (ft. ref MSL) | 7 1 9 9 3 | | | | | | |
| TOTAL WELL DEPTH (ft. below LS) | 7 2 0 0 8 | | | | | | |
| pH (units) - Field | 0 0 4 0 0 | | | | | | |
| SPEC CONDUCTANCE (umhos) - Field | 0 0 0 9 4 | | | | | | |
| TEMP OF WATER SAMPLE (°F) - Field | 0 0 0 1 1 | | | | | | |
| DEPTH TO btm. CASING FROM M.P. (ft.) | 7 2 0 3 9 | | | | | | |
| DEPTH TO WATER FROM M.P. (ft.) | 7 2 1 0 9 | | | | | | |
| ELEVATION btm. CASING, MSL (ft.) | 7 2 0 2 0 | | | | | | |
| M.P. ELEVATION ABOVE L.S. (ft.) | 8 2 5 1 5 | | | | | | |

L P C S M 0 1 1 A

# DIVISION OF LAND POLLUTION CONTROL
## CHEMICAL ANALYSIS FORM



REPORT DUE DATE 36 M / D / Y 41

FEDERAL ID NUMBER I L D 0 4 1 8 8 9 0 2 3

SITE INVENTORY NUMBER 1 9 0 5 0 0 0 0 2

MONITOR POINT NUMBER (see Instructions) X 1 0 7

REGION 6 CO. Madison

DATE COLLECTED 0 8 / 0 5 / 9 3

Clark Oil & Refining Company
FACILITY NAME

IEPA LAB (x or Blank) (see Instructions) X

FOR IEPA USE ONLY

COMPLAINT NO.

BACKGROUND SAMPLE (X)

TIME COLLECTED (24 HR CLOCK) 1 1 1 7

DATE RECEIVED M / D / Y

UNABLE TO COLLECT SAMPLE (see Instructions)

SAMPLING PURPOSE CODE (see Instructions) 4

MONITOR POINT SAMPLED BY (see Instructions) Q SS Scoop & Tube
OTHER (SPECIFY)

TIME CARD PROGRAM CODE L P 4 1 & UNIT CODE J

SAMPLE FIELD FILTERED - INORGANICS (X) ORGANICS (X)

SAMPLE APPEARANCE Petroleum Soil Sand and Clay

COLLECTOR COMMENTS Soil from GW Well Installation

SPECIAL INSTRUCTIONS TO LAB TCLP - Volatile Organic esp. Benzene

Chris Ashnovsky C N C DLPC/IEPA UPS
COLLECTED BY INITIALS DIVISION OR COMPANY TRANSPORTED BY DIVISION OR COMPANY

LAB USE ONLY

RECEIVED
AUG 13 1993
IEPA-DLPC

LAB SAMPLE NO.
DATE RECEIVED
TIME RECEIVED
LAB NAME AND ADDRESS
LAB ID NO.
SAMPLE TEMP OKAY (Y/N)
SAMPLE PROPERLY PRESERVED (Y/N)
DATE COMPLETED
FORWARD
LAB COMMENTS

SUPERVISOR SIGNATURE

RECORD CODE L P C S M 0 2 TRANS CODE A (COLUMNS 9-29 FROM ABOVE)

| FIELD MEASUREMENTS CONSTITUENT DESCRIPTION AND REQUIRED UNIT OF MEASURE | STORET NUMBER | | | < OR > | VALUE | REPORTING LEVEL | |
|---|---|---|---|---|---|---|---|
| DEPTH TO WATER (ft. below LS) | 7 2 0 1 9 | | | | | | |
| ELEVATION OF GW SURFACE (ft. ref MSL) | 7 1 9 9 3 | | | | | | |
| TOTAL WELL DEPTH (ft. below LS) | 7 2 0 0 8 | | | | | | |
| pH (units) - Field | 0 0 4 0 0 | | | | | | |
| SPEC CONDUCTANCE (umhos) - Field | 0 0 0 9 4 | | | | | | |
| TEMP OF WATER SAMPLE (°F) - Field | 0 0 0 1 1 | | | | | | |
| DEPTH TO btm. CASING FROM M.P. (ft.) | 7 2 0 3 9 | | | | | | |
| DEPTH TO WATER FROM M.P. (ft.) | 7 2 1 0 9 | | | | | | |
| ELEVATION btm. CASING, MSL (ft.) | 7 2 0 2 0 | | | | | | |
| M.P. ELEVATION ABOVE L.S. (ft.) | 8 2 5 1 5 | | | | | | |

This agency is authorized to require this information under Illinois Revised Statutes 1979, Chapter 111 1/2, Section 1004 and 1021. Disclosure of this information is required. Failure to do so may result in a Civil

L P C S M 0 1 [A]

# DIVISION OF LAND POLLUTION CONTROL
## CHEMICAL ANALYSIS FORM



REPORT DUE DATE M / D / Y

FEDERAL ID NUMBER ILD041889023

SITE INVENTORY NUMBER 1 1 9 0 5 0 0 0 0 2

REGION 6 CO. Madison

Clark Oil & Refining Company
FACILITY NAME

MONITOR POINT NUMBER X 1 0 8 (see Instructions)

DATE COLLECTED 0 8 / 0 5 / 9 3 (M D Y)

IEPA LAB (x or Blank) X (see Instructions)

FOR IEPA USE ONLY — COMPLAINT NO.

DATE RECEIVED M / D / Y

SAMPLING PURPOSE CODE 4 (see Instructions)

TIME CARD PROGRAM CODE L P 4 1 & UNIT CODE J

BACKGROUND SAMPLE (X)

TIME COLLECTED (24 HR CLOCK) 1 1 : 2 4 (H M)

UNABLE TO COLLECT SAMPLE (see Instructions)

MONITOR POINT SAMPLED BY Q (see Instructions) SS Scoop & Tube (OTHER (SPECIFY))

SAMPLE FIELD FILTERED - INORGANICS (X) ORGANICS (X)

SAMPLE APPEARANCE Petroleum Soil Sand and Clay

COLLECTOR COMMENTS Soil from GWM Well Installation

SPECIAL INSTRUCTIONS TO LAB TCLP - Volatile Organic esp. Benzene

Chris Lahnovsky C N C — COLLECTED BY — INITIALS

DLPC/IEPA — DIVISION OR COMPANY

UPS — TRANSPORTED BY

DIVISION OR COMPANY

LAB USE ONLY

RECEIVED AUG 13 1993 IEPA-DLPC

LAB SAMPLE NO.

LAB NAME AND ADDRESS

LAB ID NO.

DATE RECEIVED

TIME RECEIVED

SAMPLE TEMP OKAY (Y/N) SAMPLE PROPERLY PRESERVED (Y/N) DATE COMPLETED FORWARD

LAB COMMENTS

SUPERVISOR SIGNATURE

RECORD CODE L P C S M 0 2 TRANS CODE [A] (COLUMNS 9-29 FROM ABOVE)

| FIELD MEASUREMENTS CONSTITUENT DESCRIPTION AND REQUIRED UNIT OF MEASURE | STORET NUMBER | | | < OR > | VALUE | REPORTING LEVEL | |
|---|---|---|---|---|---|---|---|
| DEPTH TO WATER (ft. below LS) | 7 2 0 1 9 | | | | | | |
| ELEVATION OF GW SURFACE (ft. ref MSL) | 7 1 9 9 3 | | | | | | |
| TOTAL WELL DEPTH (ft below LS) | 7 2 0 0 8 | | | | | | |
| pH (units) - Field | 0 0 4 0 0 | | | | | | |
| SPEC CONDUCTANCE (umhos) - Field | 0 0 0 9 4 | | | | | | |
| TEMP OF WATER SAMPLE (°F) - Field | 0 0 0 1 1 | | | | | | |
| DEPTH TO btm. CASING FROM M.P. (ft.) | 7 2 0 3 9 | | | | | | |
| DEPTH TO WATER FROM M.P. (ft.) | 7 2 1 0 9 | | | | | | |
| ELEVATION btm. CASING, MSL (ft.) | 7 2 0 2 0 | | | | | | |
| M.P. ELEVATION ABOVE L.S. (ft.) | 8 2 5 1 5 | | | | | | |

This agency is authorized to require this information under Illinois Revised Statutes 1979 Chapter 111½ Section 1004 and 1021. Failure to provide this information is voluntary. Failure to provide all or any part of this information may result in a civil

L P C S M 0 1 A

# DIVISION OF LAND POLLUTION CONTROL
## CHEMICAL ANALYSIS FORM



REPORT DUE DATE 36 M / D / Y 41

FEDERAL ID NUMBER I L D 0 4 1 8 8 9 0 2 3

SITE INVENTORY NUMBER 1 1 9 0 5 0 0 0 0 2 (9–18)

MONITOR POINT NUMBER X 1 0 9 (19–22) (see Instructions)

REGION 6 CO. Madison

DATE COLLECTED 0 8 / 0 5 / 9 3 (23 M D Y 28)

Clark Oil & Refining Company
FACILITY NAME

IEPA LAB (x or Blank) X (see Instructions) (29)

FOR IEPA USE ONLY — COMPLAINT NO.

DATE RECEIVED 42 M / D / Y 47

SAMPLING PURPOSE CODE 4 (see Instructions) (48)

TIME CARD PROGRAM CODE L P 4 1 (49–52) & UNIT CODE J (53)

BACKGROUND SAMPLE (X) (54)

TIME COLLECTED (24 HR CLOCK) 1 1 : 2 9 (55 H M 5)

UNABLE TO COLLECT SAMPLE (see Instructions) (59)

MONITOR POINT SAMPLED BY Q (see Instructions) (60) SS Scoop & Tube OTHER (SPECIFY)

SAMPLE FIELD FILTERED - INORGANICS (X) (61) ORGANICS (X) (62)

SAMPLE APPEARANCE (64) Petroleum Soil Sand and Clay (102)

COLLECTOR COMMENTS (103) Soil from GWM Well Installation (142)

SPECIAL INSTRUCTIONS TO LAB TCLP - Volatile Organic esp. Benzene

Chris Cahnovsky (143) C N C (145) — COLLECTED BY — INITIALS

DLPC/IEPA — DIVISION OR COMPANY

UPS — TRANSPORTED BY

DIVISION OR COMPANY

LAB USE ONLY

RECEIVED
AUG 13 1993
IEPA-DLPC

LAB SAMPLE NO. ____ LAB NAME ____ LAB ID NO. (146) (149)

DATE RECEIVED ____ AND ADDRESS ____

TIME RECEIVED ____

SAMPLE TEMP OKAY (Y/N) SAMPLE PROPERLY PRESERVED (Y/N) DATE COMPLETED ____ FORWARD ____

LAB COMMENTS (150) (199)

SUPERVISOR SIGNATURE

RECORD CODE L P C S M 0 2 TRANS CODE A (COLUMNS 9-29 FROM ABOVE)

| FIELD MEASUREMENTS CONSTITUENT DESCRIPTION AND REQUIRED UNIT OF MEASURE | STORET NUMBER | | | < OR > | VALUE | REPORTING LEVEL | |
|---|---|---|---|---|---|---|---|
| DEPTH TO WATER (ft. below LS) | 72019 | | | | | | |
| ELEVATION OF GW SURFACE (ft. ref MSL) | 71993 | | | | | | |
| TOTAL WELL DEPTH (ft. below LS) | 72008 | | | | | | |
| pH (units) - Field | 00400 | | | | | | |
| SPEC CONDUCTANCE (umhos) - Field | 00094 | | | | | | |
| TEMP OF WATER SAMPLE (°F) - Field | 00011 | | | | | | |
| DEPTH TO btm. CASING FROM M.P. (ft.) | 72039 | | | | | | |
| DEPTH TO WATER FROM M.P. (ft.) | 72109 | | | | | | |
| ELEVATION btm. CASING, MSL (ft.) | 72020 | | | | | | |
| M.P. ELEVATION ABOVE L.S. (ft.) | 82515 | | | | | | |

This Agency is authorized to require this information under Illinois Revised Statutes 1979 Chapter 111 1/2 Section 1004 and 1021. Disclosure of this information is required. Failure to do so may result in a civil ...

L P C S M 0 1 A

DIVISION OF LAND POLLUTION CONTROL
CHEMICAL ANALYSIS FORM



REPORT DUE DATE 36 M / D / Y 41

FEDERAL ID NUMBER I L D 0 4 1 8 8 9 0 2 3

SITE INVENTORY NUMBER 1 1 9 0 5 0 0 0 0 2 (9–16)

REGION 6 CO. Madison

Clark Oil - Refining Company
FACILITY NAME

MONITOR POINT NUMBER X 1 1 0 (19–22)
(see Instructions)

DATE COLLECTED 0 8 / 0 5 / 9 3 (23 M D Y 25)

IEPA LAB (x or Blank) X (29)
(see Instructions)

FOR IEPA USE ONLY

COMPLAINT NO.

DATE RECEIVED 42 M / D / Y 47

SAMPLING PURPOSE CODE 4 (48)
(see Instructions)

TIME CARD PROGRAM CODE L P 4 1 (49–52) & UNIT CODE J (53)

BACKGROUND SAMPLE (X) 54

TIME COLLECTED (24 HR CLOCK) 1 1 3 6 (55 H M 5)

UNABLE TO COLLECT SAMPLE 59
(see Instructions)

MONITOR POINT SAMPLED BY Q (60) SS Scoop or Tube
(see Instructions) OTHER (SPECIFY)

SAMPLE FIELD FILTERED - INORGANICS (X) 61 ORGANICS (X) 62

SAMPLE APPEARANCE 64 Petroleum Soil
Sand and Clay 102

COLLECTOR COMMENTS 103 Soil from GWM Well
Installation 142

SPECIAL INSTRUCTIONS TO LAB TCLP - Volatile Organic esp. Benzene

Chris Cahnovsky C N C DLPC/IEPA UPS
COLLECTED BY 143 INITIALS 145 DIVISION OR COMPANY TRANSPORTED BY DIVISION OR COMPANY

LAB USE ONLY

LAB SAMPLE NO. LAB NAME LAB ID NO. 146 149

DATE RECEIVED AND ADDRESS

TIME RECEIVED

SAMPLE TEMP OKAY (Y/N) SAMPLE PROPERLY PRESERVED (Y/N) DATE COMPLETED FORWARD

LAB COMMENTS 150 199

RECEIVED
AUG 1 3 1993
IEPA-DLPC

SUPERVISOR SIGNATURE

RECORD CODE L P C S M 0 2 TRANS CODE A (COLUMNS 9-29 FROM ABOVE)

| FIELD MEASUREMENTS CONSTITUENT DESCRIPTION AND REQUIRED UNIT OF MEASURE | STORET NUMBER | | | < OR > | VALUE | REPORTING LEVEL | |
|---|---|---|---|---|---|---|---|
| DEPTH TO WATER (ft. below LS) | 7 2 0 1 9 (10–14) | (15) | (16) | (17) | (18) | (48) | (49) |
| ELEVATION OF GW SURFACE (ft. ref MSL) | 7 1 9 9 3 | | | | | | |
| TOTAL WELL DEPTH (ft. below LS) | 7 2 0 0 8 | | | | | | |
| pH (units) - Field | 0 0 4 0 0 | | | | | | |
| SPEC CONDUCTANCE (umhos) - Field | 0 0 0 9 4 | | | | | | |
| TEMP OF WATER SAMPLE (°F) - Field | 0 0 0 1 1 | | | | | | |
| DEPTH TO btm. CASING FROM M.P. (ft.) | 7 2 0 3 9 | | | | | | |
| DEPTH TO WATER FROM M.P. (ft.) | 7 2 1 0 9 | | | | | | |
| ELEVATION btm. CASING, MSL (ft.) | 7 2 0 2 0 | | | | | | |
| M.P. ELEVATION ABOVE L.S. (ft.) | 8 2 5 1 5 | | | | | | |

This agency is authorized to require this information under Illinois Revised Statutes 1979 Chapter 111 1/2 Section 1004 and 1021. Disclosure of this information is required. Any [illegible] may result in a [illegible]

L P C S M 0 1 A

# DIVISION OF LAND POLLUTION CONTROL
## CHEMICAL ANALYSIS FORM



REPORT DUE DATE 36 M / D / Y 41

FEDERAL ID NUMBER I L D 0 4 1 8 8 9 0 2 3

SITE INVENTORY NUMBER 1 1 9 0 5 0 0 0 0 2 (9–18)

MONITOR POINT NUMBER X 1 1 1 (19–22) (see Instructions)

REGION 6 CO. Madison

DATE COLLECTED 04/05/93 (23 M D Y 28)

Clark Oil - Refining Company
FACILITY NAME

IEPA LAB (x or Blank) X (29) (see Instructions)

FOR IEPA USE ONLY — COMPLAINT NO.

DATE RECEIVED 42 M / D / Y 47

SAMPLING PURPOSE CODE 4 (48) (see Instructions)

TIME CARD PROGRAM CODE L P 4 1 (49–52) & UNIT CODE U (53)

BACKGROUND SAMPLE (X) 54

TIME COLLECTED (24 HR CLOCK) 1 1 : 43 (55 H M 58)

UNABLE TO COLLECT SAMPLE (see Instructions) 59

MONITOR POINT SAMPLED BY (see Instructions) Q (60) SS Scoop or Tube OTHER (SPECIFY)

SAMPLE FIELD FILTERED - INORGANICS (X) 61 ORGANICS (X) 62

SAMPLE APPEARANCE 63 Petroleum Soil Sand and Clay 102

COLLECTOR COMMENTS 103 Soil from GWM Well Installation 142

SPECIAL INSTRUCTIONS TO LAB TCLP - Volatile Organic esp. Benzene

Chris Cahnovsky — COLLECTED BY; C N C (143–145) INITIALS; DLPC/IEPA — DIVISION OR COMPANY; UPS — TRANSPORTED BY; DIVISION OR COMPANY

RECEIVED
AUG 13 1993
IEPA-DLPC

LAB USE ONLY

LAB SAMPLE NO. ____ LAB NAME ____ LAB ID NO. 146 — — 149

DATE RECEIVED ____ AND ADDRESS ____

TIME RECEIVED ____

SAMPLE TEMP OKAY (Y/N) SAMPLE PROPERLY PRESERVED (Y/N) DATE COMPLETED ____ FORWARD ____

LAB COMMENTS 150 ____ 199

SUPERVISOR SIGNATURE

RECORD CODE L P C S M 0 2 TRANS CODE A (COLUMNS 9-29 FROM ABOVE)

| FIELD MEASUREMENTS CONSTITUENT DESCRIPTION AND REQUIRED UNIT OF MEASURE | STORET NUMBER | | | < OR > | VALUE | REPORTING LEVEL | |
|---|---|---|---|---|---|---|---|
| DEPTH TO WATER (ft. below LS) | 7 2 0 1 9 (10–14) | (15) | (16) | (17) | (18) . (19) | (48) | (49) |
| ELEVATION OF GW SURFACE (ft. ref MSL) | 7 1 9 9 3 | | | | . | | |
| TOTAL WELL DEPTH (ft. below LS) | 7 2 0 0 8 | | | | . | | |
| pH (units) - Field | 0 0 4 0 0 | | | | . | | |
| SPEC CONDUCTANCE (umhos) - Field | 0 0 0 9 4 | | | | . | | |
| TEMP OF WATER SAMPLE (°F) - Field | 0 0 0 1 1 | | | | . | | |
| DEPTH TO btm. CASING FROM M.P. (ft.) | 7 2 0 3 9 | | | | . | | |
| DEPTH TO WATER FROM M.P. (ft.) | 7 2 1 0 9 | | | | . | | |
| ELEVATION btm. CASING, MSL (ft.) | 7 2 0 2 0 | | | | . | | |
| M.P. ELEVATION ABOVE L.S. (ft.) | 8 2 5 1 5 | | | | . | | |

L P C S M 0 1 A

# DIVISION OF LAND POLLUTION CONTROL
## CHEMICAL ANALYSIS FORM



REPORT DUE DATE 36 M / D / Y 41

FEDERAL ID NUMBER ILD041889023

SITE INVENTORY NUMBER 119050000 2 (9–18)

REGION 6 CO. Madison

Clark Oil - Refining Company
FACILITY NAME

MONITOR POINT NUMBER X112 (19–22) (see Instructions)

DATE COLLECTED 08/05/93 (23 M D Y 28)

IEPA LAB (x or Blank) X (29) (see Instructions)

FOR IEPA USE ONLY — COMPLAINT NO.

DATE RECEIVED 42 M / D / Y 47

SAMPLING PURPOSE CODE 4 (48) (see Instructions)

TIME CARD PROGRAM CODE LP41 (49–52) & UNIT CODE J (53)

BACKGROUND SAMPLE (X) 54

TIME COLLECTED (24 HR CLOCK) 11:54 (55 H M 58)

UNABLE TO COLLECT SAMPLE (see Instructions) 59

MONITOR POINT SAMPLED BY (see Instructions) Q (60) SS Scoop or Tube OTHER (SPECIFY)

SAMPLE FIELD FILTERED - INORGANICS (X) 61 ORGANICS (X) 62

SAMPLE APPEARANCE 63 Petroleum Soil Sand and Clay 102

COLLECTOR COMMENTS 103 Soil from GWM Well Installation 142

SPECIAL INSTRUCTIONS TO LAB TCLP - Volatile Organic esp. Benzene

Chris Cahnovsky (COLLECTED BY) CNC (143–145 INITIALS) DLPC/IEPA (DIVISION OR COMPANY) UPS (TRANSPORTED BY) (DIVISION OR COMPANY)

LAB USE ONLY

LAB SAMPLE NO. ____ LAB NAME ____ LAB ID NO. 146 — — 149

DATE RECEIVED ____ AND ADDRESS ____

TIME RECEIVED ____

SAMPLE TEMP OKAY (Y/N) ____ SAMPLE PROPERLY PRESERVED (Y/N) ____ DATE COMPLETED ____ FORWARD ____

LAB COMMENTS 150 ____ 199

RECEIVED AUG 13 1993 IEPA-DLPC

SUPERVISOR SIGNATURE

RECORD CODE L P C S M 0 2 TRANS CODE A (COLUMNS 9-29 FROM ABOVE)

| FIELD MEASUREMENTS CONSTITUENT DESCRIPTION AND REQUIRED UNIT OF MEASURE | STORET NUMBER | | | < OR > | VALUE | REPORTING LEVEL | |
|---|---|---|---|---|---|---|---|
| DEPTH TO WATER (ft. below LS) | 72019 | | | | | | |
| ELEVATION OF GW SURFACE (ft. ref MSL) | 71993 | | | | | | |
| TOTAL WELL DEPTH (ft. below LS) | 72008 | | | | | | |
| pH (units) - Field | 00400 | | | | | | |
| SPEC CONDUCTANCE (umhos) - Field | 00094 | | | | | | |
| TEMP OF WATER SAMPLE (°F) - Field | 00011 | | | | | | |
| DEPTH TO btm. CASING FROM M.P. (ft.) | 72039 | | | | | | |
| DEPTH TO WATER FROM M.P. (ft.) | 72109 | | | | | | |
| ELEVATION btm. CASING, MSL (ft.) | 72020 | | | | | | |
| M.P. ELEVATION ABOVE L.S. (ft.) | 82515 | | | | | | |

L P C S M 0 1 1   A

# DIVISION OF LAND POLLUTION CONTROL
# CHEMICAL ANALYSIS FORM



REPORT DUE DATE __ M / __ D / __ Y

FEDERAL ID NUMBER ILD041889023

SITE INVENTORY NUMBER 1190500002

MONITOR POINT NUMBER X113 (see Instructions)

REGION 6   CO. Madison

DATE COLLECTED 08/05/93

Clark Oil Refining Company
FACILITY NAME

IEPA LAB (x or Blank) X (see Instructions)

FOR IEPA USE ONLY   COMPLAINT NO. ____

DATE RECEIVED __ M / __ D / __ Y

SAMPLING PURPOSE CODE 4 (see Instructions)

TIME CARD PROGRAM CODE LP41 & UNIT CODE J

BACKGROUND SAMPLE (X) ____

TIME COLLECTED (24 HR CLOCK) 12:05

UNABLE TO COLLECT SAMPLE (see Instructions) ____

MONITOR POINT SAMPLED BY (see Instructions) Q   SS Scoop or Tube   OTHER (SPECIFY)

SAMPLE FIELD FILTERED - INORGANICS (X) ____   ORGANICS (X) ____

SAMPLE APPEARANCE Petroleum Soil Sand and Clay

COLLECTOR COMMENTS Soil from GW Well Installation

SPECIAL INSTRUCTIONS TO LAB TCLP - Volatile Organic esp. Benzene

Chris Cahnovsky — COLLECTED BY; C N C — INITIALS; DLPC/IEPA — DIVISION OR COMPANY; UPS — TRANSPORTED BY; ____ — DIVISION OR COMPANY

LAB USE ONLY

RECEIVED
AUG 13 1993
IEPA-DLPC

LAB SAMPLE NO. ____   LAB NAME ____   LAB ID NO. ____

DATE RECEIVED ____   AND ADDRESS ____

TIME RECEIVED ____

SAMPLE TEMP OKAY (Y/N) ____   SAMPLE PROPERLY PRESERVED (Y/N) ____   DATE COMPLETED ____   FORWARD ____

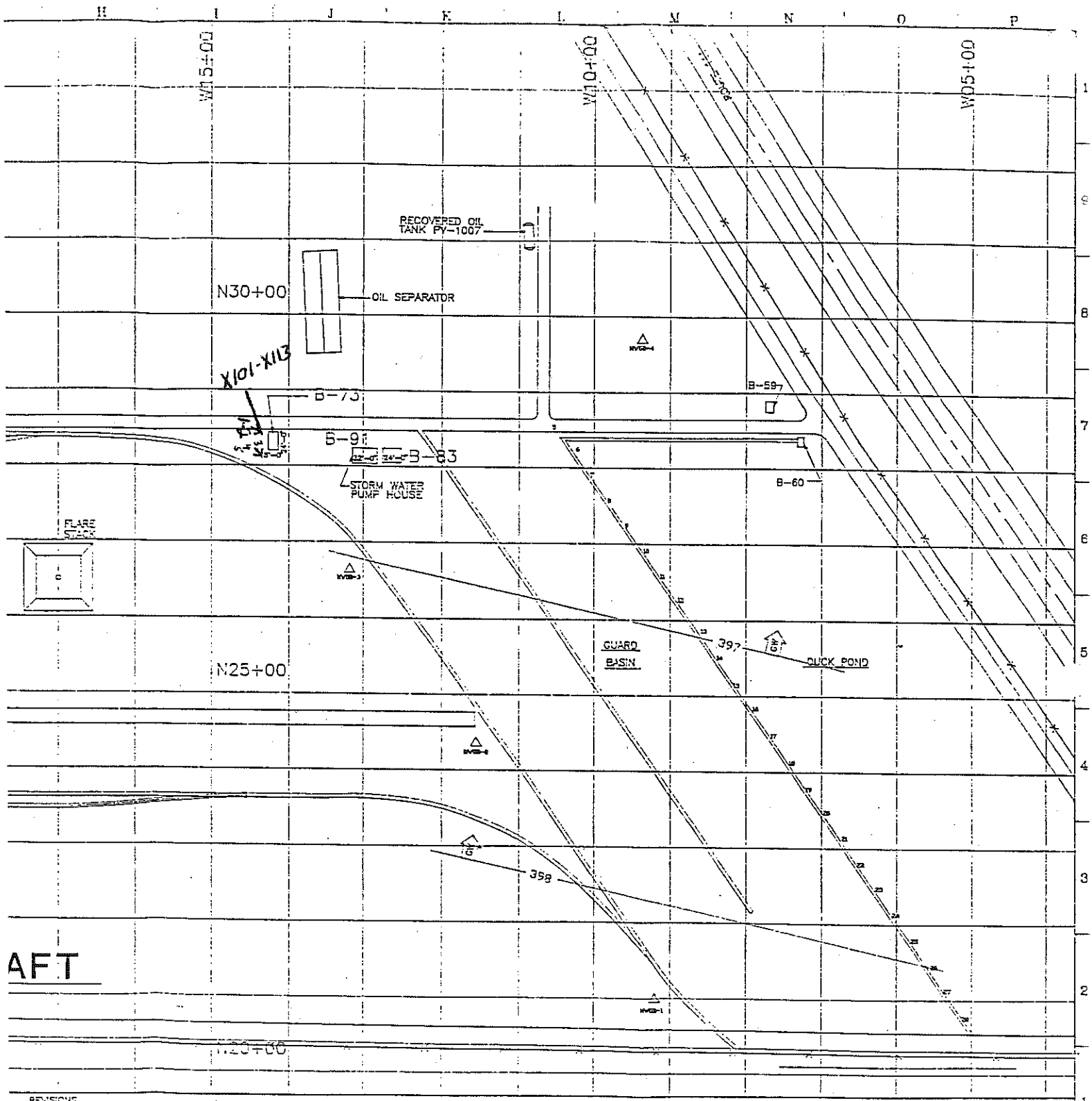
LAB COMMENTS ____

SUPERVISOR SIGNATURE ____

RECORD CODE L P C S M 0 1 2   TRANS CODE A   (COLUMNS 9-29 FROM ABOVE)

| FIELD MEASUREMENTS CONSTITUENT DESCRIPTION AND REQUIRED UNIT OF MEASURE | STORET NUMBER | | | < OR > | VALUE | REPORTING LEVEL | |
|---|---|---|---|---|---|---|---|
| DEPTH TO WATER (ft. below LS) | 72019 | | | | . | | |
| ELEVATION OF GW SURFACE (ft. ref MSL) | 71993 | | | | . | | |
| TOTAL WELL DEPTH (ft. below LS) | 72008 | | | | . | | |
| pH (units) - Field | 00400 | | | | . | | |
| SPEC CONDUCTANCE (umhos) - Field | 00094 | | | | . | | |
| TEMP OF WATER SAMPLE (°F) - Field | 00011 | | | | . | | |
| DEPTH TO btm. CASING FROM M.P. (ft.) | 72039 | | | | . | | |
| DEPTH TO WATER FROM M.P. (ft.) | 72109 | | | | . | | |
| ELEVATION btm. CASING, MSL (ft.) | 72020 | | | | . | | |
| M.P. ELEVATION ABOVE L.S. (ft.) | 82515 | | | | . | | |

This agency is authorized to require this information under Illinois Revised Statutes 1979 Chapter 111 1/2 Section 1004 and 1021 ...




REVISIONS

| DESCRIPTION | BY | DATE | APP. |
|---|---|---|---|

CLARK OIL AND REFINING
HARTFORD REFINERY
HARTFORD, IL

GUARD BASIN AND LIME PITS

GROUNDWATER GRADIENTS

PROJECT NUMBER 7094

DRAWING NUMBER

SHEET No.

*Illinois Environmental Protection Agency*
*Division of Land Pollution Control*

# RCRA INSPECTION REPORT

| | | | |
|---|---|---|---|
| USEPA #: IL D 0 4 1 8 8 9 0 2 3 | | IEPA #: 1 1 9 0 5 0 0 0 0 2 | |
| Facility Name: Clark Oil & Refining | | Phone #: 618/254-7301 | |
| Street Address: Hawthorne Street, P. O. Box 7 | | County: Madison | |
| City: Hartford | | State: Illinois | Zip: 62048 |
| Region: 6 | Inspection Date: 06 / 30 / 93 | From: 9:30 a.m. | To: 3:15 p.m. |
| Weather: Sunny 88°F | | | |

## TYPE OF FACILITY

| | | | |
|---|---|---|---|
| Notified As: Generator | | Regulated As: G/S/D | |
| LDF? Yes (Yes or No) | HPV? Yes | 90-Day F/U Required?: | YES X 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: 08 / 18 / 80 , from (initial) or (subsequent) Notification.

Initial Part A Date: 11 / 18 / 80 Amended: ___ / ___ / ___

Part A Withdrawal requested: 11 / 23 / 82 Approved by (US) (IL) EPA: 12 / 15 / 83

## PART B PERMIT APPLICATION

Part B Permit Submitted: Y or (N) ___ / ___ / ___ Final Permit Issued: ___ / ___ / ___

## ENFORCEMENT

RECEIVED
JUL 26 1993
IEPA-DLPC

Has the firm been referred to -- USEPA: Y or N ___ / ___ / ___

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

## ORDERS ISSUED

CACO: ___ / ___ / ___ CAFO: ___ / ___ / ___ 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 1990 | 1991 | 1992 |
|---|---|---|---|---|---|---|---|---|---|
| S04 | No | No | Yes | No | No | No | N/A | No | No |
| | | | | | | | | | |
| | | | | | | | | | |
| | | | | | | | | | |
| | | | | | | | | | |
| | | | | | | | | | |
| | | | | | | | | | |

| | | | |
|---|---|---|---|
| Name | Clark Oil and Refining | Name | Clark Oil and Refining |
| Address | 8182 Maryland Avenue | Address | 8182 Maryland Avenue |
| City | St. Louis | City | St. Louis |
| State | Missouri Zip 63105 | State | Missouri Zip 63105 |
| Phone # | 314/889-9600 | Phone # | 314/889-9600 |

| PERSON(S) INTERVIEWED | TITLE | PHONE # |
|---|---|---|
| Richard Thomas | Environmental Engineer | 618/254-7301 |
| Bill Irwin | Environmental Engineer | 618/254-7301 |
| | | |
| | | |
| | | |
| | | |

| INSPECTION PARTICIPANT(S) | AGENCY/TITLE | PHONE # |
|---|---|---|
| Chris Cahnovsky | IEPA/EPS II | 618/346-5120 |
| | | |
| | | |
| | | |

| PREPARED BY | AGENCY/TITLE | PHONE # |
|---|---|---|
| [signature] | IEPA/EPS II | (618) 346-5120 |

# SUMMARY OF APPARENT VIOLATIONS

*Previously Alleged Violations

| Area | Class | Section | |
|---|---|---|---|
| DOR | 1 | 703.121(a) | * |
| DOR | 1 | 703.150(a) | * |
| DGS | 1 | 725.113(b) | * |
| DMR | 2 | 725.175 | * |
| DGW | 1 | 725.190(a) | * |
| DGW | 1 | 725.191(a) | * |
| DGW | 1 | 725.192(a) | * |
| DCL | 1 | 725.212(a) | * |
| DCL | 1 | 725.218(a) | * |
| DFR | 1 | 725.242(a) | * |
| DFR | 1 | 725.244(a) | * |
| | | | |
| | | | |

| Area | Class | Section |
|---|---|---|
| GGR | 1 | 722.111 |
| GMR | 1 | 722.123(a) |
| GPT | 1 | 722.134(a) |
| | | 725.131 |
| | | 725.292(g) |
| | | 725.296(b) |
| | | 725.295(a) |
| GPT | 1 | 722.134(c) |
| GRR | 2 | 722.140(c) |
| DGS | 2 | 725.115(a) |
| DGS | 2 | 725.115(b) |
| DGS | 1 | 725.116(a) |
| DCP | 2 | 725.152(b) |

| Area | Class | Section |
|---|---|---|
| DMR | 2 | 725.173 |
| DSI | 1 | 725.323 |
| DSI | 2 | 725.326 |
| GLB | 1 | 728.107(a)(7) |
| GLB | 1 | 728.107(a)(5) |
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Facility Name: Clark Oil and Refinery

USEPA #: IL D041889023

IEPA #: 1190500002

# 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) * 1990 | * 1991 | * 1992 | Amount on Site | Rate of Generation | Last Manifested Shipment | Disposition |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Dissolved Air Float | DAF unit in WWTP | Listed | K048 | yes | N/A | G n/A F | G n/A F | G n/A F | ~7800 gal | ~116 barrels per day | N/A | Reused to produce Petroleum Coke 721.106a)3)I |
| Slop oil Emulsion Solid | WWTP | Listed | K049 | Yes | | G n/A F | G n/A F | G n/A F | Included Above | Included Above | N/A | Same as above |
| API sludge | API Seperator | Listed | K051 | yes | | G n/A F | G n/A F | G n/A F | Included Above | Included Above | N/A | Same as above |
| API bottom sludge | Sludge from bottom of API Produced Turnaround | Listed | K051 | yes | | G F | G F | G n/A F | -0- | During Turnaround of API | 2/9/92 | Clayton Chemical |
| Waste petr. Naptha | S-K parts washer | S-K | D001 D039 D018 | yes | | G F | G F | G F | -0- | Every 2 weeks | 5/17/93 | Safety-Kleen |
| Leaded paint Chips | painting operations | 8/4/92 | D008 | yes | | G n/A F | G n/A F | G F | -0- | VARIES | 12/15/92 | Controlled WASTE Division. |
| Refinery I° & II° sludges | WWTP Clean out of ditches | Listed | F037 F038 | NO | NO | G n/A F | G F | G F | 24,420 cu. yd. | N/A | 4/29/93 | CWM of Indiana Ft. Wayne |
| Heat Exchanger Bundel Cleaning Sludge | Clean-up of spills & from Cleaning B. | Listed | K050 | yes | N/A | G n/A F | G n/A F | G n/A F | ~100 yd | During Turnaround & spill clean-up | 5/30/93 | → discharge to WWTP → CWM - Sulfur Al. |
| Tetra Ethyl lead | Tank Clean-out of Chemical Additives | P waste | P110 | yes | N/A | G n/A F | G n/A F | G F | -0- | one-time | 9/23/92 | TWI |
| Coker unifiner spent Catylist | spent Catylist | Process Knowledge | D001 | yes | N/A | G n/A F | G n/A F | G n/A F | -0- | VARIES | 5/11/93 | Amax Metals Recovery, In Braithwaite Al |

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

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ILD041889023

**REMARKS**

On June 30, 1993, a Compliance Evaluation Inspection was conducted at Clark Oil and Refinery Corporation (Clark). Present during this inspection were Chris Cahnovsky, IEPA; Richard Thomas and Bill Irwin, Clark.

Clark operates a 60,000 barrel per day refinery in Hartford, Illinois. Clark produces several hazardous wastestreams at this facility. These streams include DAF float (K048), Slop Oil Emulsion Solids (K049), Heat Exchanger Bundle Cleaning Sludge (K050), API Separator Sludge (K051), Waste Petroleum Naphtha (D001), leaded paint chips (D008), coker unifier spent catalyst (D001) and Refinery Primary and Secondary Sludge (F037 and F038). Clark operates a 90 day drum accumulation area and a 90 day accumulation tank (Tank 4) under generator status.

No waste was observed in the 90 day drum accumulation area (Photo 7). The K048, K049, and K051 wastestreams are reused to produce petroleum coke. These wastes are pumped to Tank 4 for temporary storage prior to be taken to the Coker unit. This waste is transferred from Tank 4 to Tank T1-18 via a vacuum truck. T1-18 is a tank located at the Coker unit which is used to feed the injection tank on the unit. This waste is introduced to the initial quench phase of the Coke producing operation. This recycling process, including Tank T1-18 is exempt pursuant to 721.106(c)(1). However not all K051 generated is used in the manner described above. During turnaround, the heavier K051 sludge which settles to the bottom of the separator, is removed and shipped off site. The last shipment of this waste was March 9, 1992. Turnaround refers to the process of shutting down the unit or process to provide necessary repairs and maintenance.

Tank 4 is not part of this recycling process and is regulated as a 90 day accumulation tank (Photos 1-6). The waste accumulated in this tank include K048, K049 and K051. Tank 4 was constructed in 1948 and put into service as a hazardous waste accumulation tank between 1988 and 1989. This tank system has secondary containment. No independent tank assessment was available for this tank. This is an apparent violation of 722.134(a) specifically 725.292(g).

A sign with the words hazardous waste was observed on the outside of the secondary containment at Tank 4. Per an operator at this unit, Tank 4 contained 25.71 feet of waste, which correlates to 7,800 gallons. This exceeds the capacity of a satellite container. There was no accumulation start date on this sign, which states the date on which the 90 accumulation begins.

When the sludges settle to the bottom of this tank, the water rises to the top and the water is then drawn off. During this water draw down process, sludge was released into the secondary containment. Per Mr. Thomas, this drawn down occurred during the day shift on June 29, 1993. Per Mr. Irwin, the day shift goes from 8:00 a.m. to 4:00 p.m., but the operators leave at 3:00 p.m. The waste was still present in the secondary containment after 3:00 p.m. Apparently, this waste has been in the secondary containment area for more than 24 hours (Photos 3 & 4). This is an apparent violation of 722.134(a), specifically 725.296(b)(2). Inspections are being conducted at this tank every four hours. However, these inspections are not documented correctly, per Section 725.295, subsections (a) and (b). This is an apparent violation of 722.134(a), specifically 725.295(a).

At Tank 4, a satellite drum is being utilized below the hose/piping outside the containment area to collect oily liquid. This drum was observed with the lid not fully closed, constituting an open container (Photo 5). This is an apparent violation of 722.134(c).

The K050 wastestream is only generated during the turnaround on heat exchangers. The sludge (K050) is removed from the heat exchanger bundles by high pressure water spray at the bundle cleaning pad. This sludge is washed into the process sewers and treated at the facility's wastewater treatment plant. During this inspection, sludge was observed on the pad and on the gravel behind the pad (Photo 11-12). At this time, no one was observed working in the area. The sludge should have been completely cleaned off the pad before the workers left the area. This is an apparent violation of 722.134(a), specifically 725.131.

During the review of Clark's manifests and waste analysis, the following deficiencies were observed. Manifest IL5231860 (attached) dated March, 3 1992, did not have a Land Disposal Restriction Notification attached. This is an apparent violation of 728.107(a)(7). Manifest INA0624516 (attached) did not have a date when a load of F037 and F038 was received by the transporter. This is an apparent violation of 722.123(a). Process knowledge was used to determine the hazardous characteristics of coker unifier spent catalyst (D001). However, no documentation has been kept on file to verify this waste determination and the treatment standard for the Land Disposal Restriction regulations. These are apparent violations of 722.140(c) and 728.107(a)(5), respectively.

Clark produced their Emergency Response Plan to satisfy the requirements of the RCRA contingency plan. After a review of this document, the following deficiencies were noted. This plan did not include specific areas of hazardous waste management, such as the drum accumulation pad, Tank 4 and the Guard Basin. Also, The plan did not include what actions facility personnel must take in case of any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents from these areas. This is an apparent violation of 725.152(b). Clark is in the process of revising their contingency plan. This revision should include the above comments.

Clark conducts annual training. However, no written outline of the training program to satisfy the requirements of RCRA could be produced, only a video of the training was available. Per Mr. Irwin, the video does not contain training of the operations conducted at of the drum accumulation pad, Tank 4 and the Guard Basin and what facility personnel must do in case of a release of hazardous waste. Since there are deficiencies in the contingency plan the employees need to be trained on implementation of the corrected contingency plan. This is an apparent violation of 725.116(a).

On October 27, 1992, Clark informed the Agency that primary wastewater treatment sludge (F037) and secondary wastewater treatment sludge (F038) may have impacted the Guard Basin and the ditches leading to the Guard Basin (Photos 1 & 2). The Guard Basin is an earthen surface impoundment that manages stormwater and receives some process water. The F037 and F038 listing came into effect in November, 1990 (Federal Register/Vol. 55, No 213 November 2, 1990). Before this rule, the Guard Basin received dry weather flow from the wastewater treatment system. In 1991, Clark decided to prevent all dry weather flow from entering the Guard Basin. Clark constructed an overflow and underflow weir and a concrete pit to contain process water and stormwater before being pumped to the wastewater treatment plant (Photo 3 & 4). Between August and October, 1992, Clark determined that their efforts to prevent all dry weather flow from the Guard Basin were unsuccessful. Since the Guard Basin received dry weather flow, this basin is considered a hazardous waste surface impoundment. Clark's intentions are to remove all sludges from this basin and ship it off-site as F037 and F038 before June 30, 1994. This is when F037 and F038 from the cleaning out of a surface impoundment becomes regulated under the Land Disposal Restrictions, pursuant to Part 728. Clark initiated a sampling and analysis plan and determined there are approximately 24,420 cu. yards of sludge in the guard basin.

Per Mr. Bill Irwin, the ditches from the hard piping to the Guard Basin have received F037 and F038. Between June 9, 1992 and August 16, 1992, 10,623,840 pounds of F037 and F038 sludge were removed from the ditches leading to the Guards Basin and were shipped off-site to Chemical Waste Management of Indiana.

Currently, Clark is attempting to prevent all flow to the Guard Basin. Three pipes to the Guard Basin have been blocked off and the wastewater is being pumped to the WWTP. Per Mr. Thomas, the only water currently going into the Guard Basin is stormwater that enters the system beyond these blockages. The stormwater that reaches the basin is then pumped to the WWTP.

The Guard Basin, weir and concrete pit were inspected during this site visit. Proper freeboard is being maintained in the Guard Basin. The earthen containment dikes that surround the basin are not constructed to minimize wind and water erosion. This is an apparent violation of 725.323. Inspections of this area are not being conducted on a daily basis. This is an apparent violation of 725.115(a) and (b) and 725.326. Also, no operating records are being maintained for the Guard Basin. This is an apparent violation of 725.173.

The concrete basin that holds the wastewater and stormwater, before being pumped back to the WWTP, appeared to have had a release of wastewater from this system (Photos 5, 6 & 7). This also, is an apparent violation of 722.134(a), specifically 725.131.

During the inspection of these areas, 13 drums of soil from the instillation of groundwater monitoring wells were observed next to the pump house at the Guard Basin (Photo 8). Per, Mr. Thomas the analytical data for this soil has been obtained. Clark supplied the Agency with this information on July 2, 1993 (attached). No TCLP analysis has been obtained of the soils in these drums. This is an apparent violation of 722.111. The Agency requests that the TCLP be conducted of the soils in these drums. The Agency would like duplicate samples of this waste.

As a result of this inspection, the following violations have been alleged (a detailed summary of these apparent violations are given in attachment A of this Remarks page):

722.111
722.123(a)
722.134(a) - Specifically 725.131, 725.292(g), 725.296(b)(2), 725.295(a)
722.134(c)
722.140(c)
725.115(a) and (b)
725.116(a)
725.152(b)
725.173
725.323
725.326
728.107(a)(7)
728.107(a)(5).

The following is a list of previous alleged violations found during an October 28, 1992, record inspection:

| | |
|---|---|
| 703.121(a) | 725.192(a) |
| 703.150(a) | 725.212(a) |
| 725.113(b) | 725.218(a) |
| 725.175 | 725.242(a) |
| 725.190(a) | 725.244(a) |
| 725.191(a). | |

CNC/Clark3

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ATTACHMENT A

1. Pursuant to 35 Ill. Adm. Code 722.111, a person who generates a solid waste as defined in Section 721.102, must determine if that waste is a hazardous waste using the following method:

   a. He should first determine if the waste is excluded from regulation under Section 721.104.

   b. He must then determine if the waste is listed as a hazardous waste in Subpart D of Part 721.

Note: Even if a waste is listed, the generator still has an opportunity under Section 720.122 and 40 CFR Section 260.22 to demonstrate that the waste from his particular facility or operation is not a hazardous waste.

   c. If the waste is not listed as a hazardous waste in Subpart D of Part 721, he must determine whether the waste is identified in Subpart C of Part 721 by either:

      1. Testing the waste according to the methods set forth in Subpart C of Part 721, or according to an equivalent method approved by the Board under Section 720.120; or

      2. Applying knowledge of the hazard characteristic of the waste in light of the materials or the processes used.

You are in apparent violation of Section 722.111 for the following reason: Failure to obtain a waste determination for 13 drums of soil from groundwater monitoring well installation.

Note: The Agency would also like the opportunity to split samples of this waste.

2. Pursuant to 35 Ill. Adm. Code 722.123(a), a generator must:

   1. Sign the manifest certification by hand;

   2. Obtain the handwritten signature of the initial transporter and the date of acceptance on the manifest;

   3. Retain one copy of the manifest in accordance with the requirements of Section 722.140(a);

   4. Send one copy of the manifest to the Agency within two working days of initiating the manifest.

You are in apparent violation of 35 Ill. Adm. Code 722.123(a) for the following reason: Failure to obtain the date of acceptance by the transporter on manifest number INA0624516

3. Pursuant to 35 Ill. Adm. Code 722.134(a), except as provided in subsections (d), (e) or (f), a generator may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status provided that:

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

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

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

   4. The generator complies with the requirements for owners or operators in 35 Ill. Adm. Code 725 Subparts C (Preparedness and Prevention) and D (Contingency Plan and Emgergency Procedures) and with 35 Ill. Adm. Code 725.116 (Personnel Training).

You are in apparent violation of 35 Ill. Adm. Code 722.134(a) in that items 1 and 4 above were not complied with.

Specifically, the requirements of item 1 and/or 4 above (listed by regulation) which were not complied with, as well as the deficiencies observed, are:

Pursuant to 35 Ill. Adm. Code 725.131, facilities must be maintained and operated to minimize the possibility of a fire, explosion or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil or surface water which could threaten human health or the environment. You are in apparent violation of 35 Ill. Adm. Code 725.131 for the following reasons: Waste was observed on the heat exchanger bundle cleaning pad and on the ground behind this pad. Also, waste was observed on the ground around the concrete pit.

Pursuant to 35 Ill. Adm. Code 725.292(g), the owner and operator must obtain and keep on file at the facility written statements by those persons required to certify the design of the tank system and supervise the installation of the tank system in accordance with the requirements of subsections (b) through (f) to attest that the tank system was properly designed and installed and that repairs, pursuant to subsections (b) and (d) were performed. These written statements must also include the certification statement as required in 35 Ill. Adm. Code 702.126(d).

You are in apparent violation of 35 Ill. Adm. Code 725.292(g) for the following reason: Failure to obtain an independent, certified written assessment for Tank 4.

Pursuant to 35 Ill. Adm. Code 725.295(a), the owner or operator shall inspect, where present, at least once each operating day:

1. Overfill/spill control equipment (e.g., waste-feed cutoff systems, bypass systems and drainage systems) to ensure that it is in good working order;

2. The aboveground portion of the tank system, if any, to detect corrosion or releases of waste;

3. Data gathered from monitoring equipment, (e.g., pressure and temperature gauges, monitoring well(s)) to ensure that the tank system is being operated according to its design; and

4. The construction materials and the area immediately surrounding the externally accessible portion of the tank system including secondary containment structures (e.g., dikes) to detect erosion or signs of releases of hazardous waste (e.g., wet spots, dead vegetation);

   (Board Note: Section 725.115(c) requires the owner or operator to remedy any deterioration or malfunction the owner or operator finds. Sections 725.296 requires the owner or operator to notify the Agency within 24 hours of confirming a release. Also, 40 CFR 302 (1986) may require the owner or operator to notify the National Response Center of a release.

You are in apparent violation of 35 Ill. Adm. Code 725.295(a) for the following reason: Proper inspections are not being documented pursuant to this Section.

Pursuant to 35 Ill. Adm. Code 725.296, a tank system or secondary containment system from which there has been a leak or spill, or which is unfit for use, must be removed from service immediately. The owner or operator shall satisfy the following requirements:

a. Cease using; prevent flow or addition of wastes. The owner or operator shall immediately stop the flow of hazardous waste into the tank system or secondary containment system and inspect the system to determine the cause of the release.

b. Removal of waste from tank system or secondary containment system.

1. If the release was from the tank system, the owner or operator shall, within 24 hours after detection of the leak, remove as much of the waste as is necessary to prevent further release of hazardous waste to the environment and to allow inspection and repair of the tank system to be performed.

2. If the release was to a secondary containment system, all released materials must be removed within 24 hours to prevent harm to human health and the environment.

c. Containment of visible releases to the environment. The owner or operator shall immediately conduct a visual inspection of the release and, based upon that inspection:

1. Prevent further migration of the leak or spill to soils or surface water; and

2. Remove, and properly dispose of, any visible contamination of the soil or surface water.

You are in apparent violation of 35 Ill. Adm. Code 725.296 for the following reason: Failure to comply with (b)(2) of this Section, specifically, waste from the water draw down at Tank 4 was in the secondary containment area for more than 24 hours.

4. Pursuant to 35 Ill. Adm. Code 722.134(c):

1. A generator may accumulate as much as 55 gallons of hazardous waste or one quart of acutely hazardous waste listed in 35 Ill. Adm. Code 721.133(e) in containers at or near any point of generation where wastes initially accumulate, which is under the control of the operator of the process generating the waste, without a permit or interim status and without complying with paragraph (a) provided the generator:

A. Complies with 35 Ill. Adm. Code 725.271, 725.272 and 725.273(a) (Use and Management of Containers); and

B. marks the generator's containers either with the words "Hazardous Waste" or with other words that identify the contents of the containers.

2. A generator who accumulates either hazardous waste or acutely hazardous waste listed in 35 Ill. Adm. Code 721.133(e) in excess of the amounts listed in Subsection (c)(1) at or near any point of generation must, with respect to that amount of excess waste, comply within three days with Subsection (a) or other applicable provisions of this chapter. During the three day period the generator must continue to comply with Subsection (c)(1). The generator must mark the container holding the excess accumulation of hazardous waste with the date the excess amount began accumulating.

You are in apparent violation of 35 Ill. Adm. Code 722.134(c) for the following reason: Failure to close the satellite drum at Tank 4.

5. 35 Ill. Adm. Code 722.140(c) requires the generator to keep records of any test results, waste analyses or other determinations made in accordance with Section 722.111 for at least three years from the date that the waste was last sent to on-site or off-site treatment, storage or disposal facility. You are in apparent violation of this Section in that no records for the waste determination by process knowledge of the coker unifier spent catalyst sludge have not been maintained by this facility.

6. Pursuant to 35 Ill. Adm. Code 725.115(a), the owner or operator shall inspect the facility for malfunctions and deterioration, operator errors and discharges which may be causing -- or may lead to -- the conditions listed below. The owner or operator shall conduct these inspections often enough to identify problems in time to correct them before they harm human health or the environment.

   1. Release of hazardous waste constituents to the environment or

   2. A threat to human health.

You are in apparent violation of 35 Ill. Adm. Code 725.115(a) for the following reason: Failure to conduct inspections at the Guard Basin.

7. Pursuant to 35 Ill. Adm. Code 725.115 (b):

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

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

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

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

You are in apparent violation of 35 Ill. Adm. Code 725.115(b) for the following reason: Failure to conduct inspections at the Guard Basin.

8. Pursuant to 35 Ill. Adm. Code 725.116(a), facility personnel must complete a program of classroom instruction or on-the-job training directed by a person trained in hazardous waste management procedures. The training must be designed to ensure that facility personnel are able to respond to emergencies, and at a minimum meet the applicable requirements of Section 725.116(a)(3). You are in apparent violation of 35 Ill. Adm. Code 725.116(a) for the following reasons: RCRA training does not include the employee's function at Tank 4, the drum storage pad and the Guard Basin. Also, since there are deficiencies in the hazardous waste Contingency Plan, employees need to be trained on the corrected Plan.

9. Pursuant to 35 Ill. Adm. Code 725.152(b), if the owner or operator has already prepared a Spill Prevention, Control and Countermeasures (SPCC) Plan in accordance with 40 CFR Part 112 or 1510 or some other emergency or contingency plan, he need only amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Section. You are in apparent violation of 35 Ill. Adm. Code 725.152(b) for the following reasons: The areas of hazardous waste management, i.e., Tank 4, the drum pad and Guard Basin, must be included in the Contingency Plan. Also, the Plan did not include what actions facility personnel must take in case of a release from these areas.

10. Pursuant to 35 Ill. Adm. Code 725.173:

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

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

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

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

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

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

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

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

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

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

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

You are in apparent violation of 35 Ill. Adm. Code 725.173 for the following reason: Failure to have an operating record for the Guard Basin.

11. Pursuant to 35 Ill. Adm. Code 725.323, all earthen dikes must have a protective cover, such as grass, shale or rock to minimize wind and water erosion and to preserve their structural integrity. You are in apparent violation of this Section in that Clark failed to provide adequate cover for the earthen dikes of the Guard Basin.

12. Pursuant to 35 Ill. Adm. Code 725.326, the owner or operator must inspect:

    a. The freeboard level at least once each operating day to ensure compliance with Section 725.322; and

    b. 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.

You are in apparent violation of 35 Ill. Adm. Code 725.326 for the following reason: Failure to conduct inspections of the Guard Basin.

13. Pursuant to 35 Ill. Adm. Code 728.107(a)(5), if a generator determines whether the waste is restricted based solely on the generator's knowledge of the waste, the generator shall retain all supporting data used to make this determination on-site in the generator's files. If a generator determines whether the waste is restricted based on testing the waste or an extract developed using the test method described in Appendix A, the generator shall retain all waste analysis data on site in the generator's files.

You are in apparent violation of 35 Ill. Adm. Code 728.107(a)(5) for the following reason: Failure to retain supporting data on process knowledge used for the waste determination of the coker unifier spent sludge.

14. Pursuant to 35 Ill. Adm. Code 728.107(a)(7), generators shall retain on-site a copy of all notices, certifications, demonstrations, waste analysis data and other documentation produced pursuant to this Section for at least five years from the date that the waste that is the subject of such documentation was last sent to on-site or off-site treatment, storage or disposal. The five year record retention period is automatically extended during the course of any unresolved enforcement action regarding the regulated activity or as requested by the Agency.

You are in apparent violation of 35 Ill. Adm. Code 728.107(a)(7) for the following reason: Failure to communicate a copy of a Land Disposal Restriction Notification form for manifest #IL5231860.

CNC:cas/1033L

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF SOLID AND HAZARDOUS WASTE MANAGEMENT
P.O. Box 7035
Indianapolis, IN 46207-7035

7/13/92

**PLEASE PRINT OR TYPE** (Form designed for use on elite (12-pitch) typewriter.) Form Approved. OMB No. 2050-0039. Expires 9-30-9

# UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: ILD041889023 — Manifest Document No.: 000011 — 2. Page 1 of 1

Information in the shaded areas is not required by Federal law, but items D, F, H and I are required by State law.

3. Generator's Name and Mailing Address
Clark Oil & Refining Corp.
P.O. Box 7
Hartford, IL 62048

4. Generator's Phone (618) 254-7301

A. State Manifest Document Number: INA 0624516

B. State Generator's ID: 1190500002

5. Transporter 1 Company Name: Beelman Transportation

6. Use EPA ID Number: ILD007814825

C. State Transporter's ID: 0093

D. Transporter's Phone: 618-452-8187

7. Transporter 2 Company Name:

8. Use EPA ID Number:

E. State Transporter's ID:

F. Transporter's Phone:

9. Designated Facility Name and Site Address
Chemical Waste Management of Indiana
4636 Adams Center Road
Ft. Wayne, Indiana

10. Use EPA ID Number: IND078911146

G. State Facility's ID: IND078911146

H. Facility's Phone: 219-447-5585

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)

| | 12. Containers No. | Type | 13. Total Quantity | 14. Unit Wt/Vol. | Waste No. |
|---|---|---|---|---|---|
| a. R.Q., Hazardous Waste Solids, N.O.S., ORM-E, NA 9189, (F037, F038), R.Q. 1lb | 001 | DT | 44060 | lbs | F037, F038 |

RECEIVED
JUL 26 1993
IEPA-DLPC

J. Additional Descriptions for Materials Listed Above
Primary & Secondary Solids-oily ditch clean-up
MSDS available: Emergency phone - Chemtrec 800-424-9300

K. Handling Codes for Wastes Listed Above
AF0505 ACL
D81 Net 43980#

15. Special Handling Instructions and Additional Information
Guide NBR 31 In case of emergency call CWM-Emelle, AL 205-652-9721
WO # ~~3110~~ 31160

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: Richard Thomas — Signature: Richard Thomas — Month Day Year: 07 06 92

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: Jeff Copple — Signature: Jeff Copple — Month Day Year:

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name: — Signature: — Month Day Year:

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: Sandy [illegible] — Signature: [illegible] — Month Day Year: 07 07 92

EPA Form 8700-22
Previous editions are obsolete.
State Form 11865 (R/4-89)

COPY 4 TSD MAIL TO GENERATOR

INA 0624516

In case of a spill call the Indiana Office of Environmental Response at 317/241-4336 (day or night) and the National Response Center at 800/424-8802 or 202/426-2675.

STATE OF ILLINOIS — ENVIRONMENTAL PROTECTION AGENCY DIVISION OF LAND POLLUTION CONTROL

SAFETY-KLEEN CORP. P.O. BOX 19276 SPRINGFIELD, ILLINOIS 62794-9276 (217) 782-6761

STATE PRESCRIBED FORM State Form LPC 62 8/81 IL532-0610 — FOR SHIPMENT OF HAZARDOUS AND SPECIAL WASTE.

5-160-02

NOTE: FORM DESIGNED TO PRINT 8 LINES PER INCH — EPA Form 8700-22 (6-89) — Form Approved. OMB No. 2050-0039 Expires 9-30-92

**UNIFORM HAZARDOUS WASTE MANIFEST**

1. Generator's US EPA ID No.: ILD 041889023
Manifest Document No.: 77637
2. Page 1 of 1

Information in the shaded areas is not required by Federal law, but is required by Illinois law.

3. Generator's Name and Mailing Address
CLARK
ATTN JOHN MEYER 502 BUILDING
HARTFORD IL 62048

4. Generator's Phone ( 618 ) 000-0000

A. Illinois Manifest Document Number: IL 5231860 — MANIFEST FEE PAID

B. Illinois Generator's ID: 1190500002

5. Transporter 1 Company Name: SAFETY-KLEEN CORP.
6. US EPA ID Number: ILD 051060408

C. Illinois Transporter's ID: 1123
D. (618) 398-6880 Transporter's Phone

7. Transporter 2 Company Name
8. US EPA ID Number

E. Illinois Transporter's ID
F. ( ) Transporter's Phone

9. Designed Facility Name and Site Address
SAFETY-KLEEN CORP.
20 TUCKER DRIVE
CASEYVILLE, IL 62232
10. US EPA ID Number: 5-160-02 ILD 981097819

G. Illinois Facility's ID: 1630250007
H. Facility's Phone: (618) 398-6880

| 11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number) | 12. Containers No. | Type | 13. Total Quantity | 14. Unit Wt/Vol | I. Waste No. |
|---|---|---|---|---|---|
| a. WASTE PETROLEUM NAPHTHA COMBUSTIBLE LIQUID UN1255(D001)(ERG #27) | 002 | DM | 00037 | G | EPA HW Number X X D001; Authorization Number 000004 |
| b. | | | | | EPA HW Number X X; Authorization Number |
| c. | | | | | EPA HW Number X X; Authorization Number |
| d. | | | | | EPA HW Number X X; Authorization Number |

J. Additional Descriptions for Materials Listed Above
I(A) D039 D018

K. Handling Codes for Wastes Listed Above in Item #14
G = Gallons Y = Cubic Yards

15. Special Handling Instructions and Additional Information
9210 36989606 577637 5-160-02-3082 2106
(G-MO#)- IF UNABLE TO DELIVER RETURN TO GENERATOR. MO TRANSP. ID H-1273
EMERGENCY RESP#708-888-4660 24HR
SKDOT# A: 501 B: C: D:

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations, and Illinois regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: Richard Thomas — Signature: Richard Thomas — Date (Month Day Year): 03 03 92

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: MICHAEL OGANIC — Signature: Michael Oganic — Date (Month Day Year): 03 03 92

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name — Signature — Date (Month Day Year):

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.
Printed/Typed Name: Dina Payne — Signature: Dina Payne — Date (Month Day Year): 03 03 92

This Agency is authorized to require, pursuant to Illinois Revised Statutes 1989, Chapter 111½ Section 1004 and 102, that this information be submitted to the Agency. Failure to provide the information may result in a civil penalty against the owner or operator not to exceed $25,000 per day of violation. Falsification of this information may result in a fine up to $50,000 per day of violation and imprisonment up to 5 years. This form has been approved by the Forms Management Center.

COPY 1. TSD MAIL TO GENERATOR

State of Illinois
ENVIRONMENTAL PROTECTION AGENCY

Mary A. Gade, Director

2009 Mall Street, Collinsville, IL 62234

618/346-5120

July 23, 1993

Refer to: 1190050002 - Madison County
Clark Oil and Refining Corporation
ILD041889203 - FOS

RECEIVED
JUL 26 1993
IEPA-DLPC

Mr. Bill Irwin
Environmental Engineer
Clark Oil and Refining Corp.
Hawthorne Street
P.O. Box 7
Hartford, Illinois 62048

Dear Mr. Irwin:

Enclosed please find copies of photographs taken at your facility during the June 30, 1993 inspection.

If you have any questions, please call me at 618/346-5120.

Sincerely,

ENVIRONMENTAL PROTECTION AGENCY

Christopher N. Cahnovsky
Environmental Protection Specialist
Bureau of Land

CNC:cas/1038L
Enclosures

bcc: BOL - Division File
bcc: BOL - Collinsville
bcc: Carol Barry - DLC

## ANALYTICAL RESULTS SOILS
## METALS AND ORGANIC INDICATORS (mg/kg)

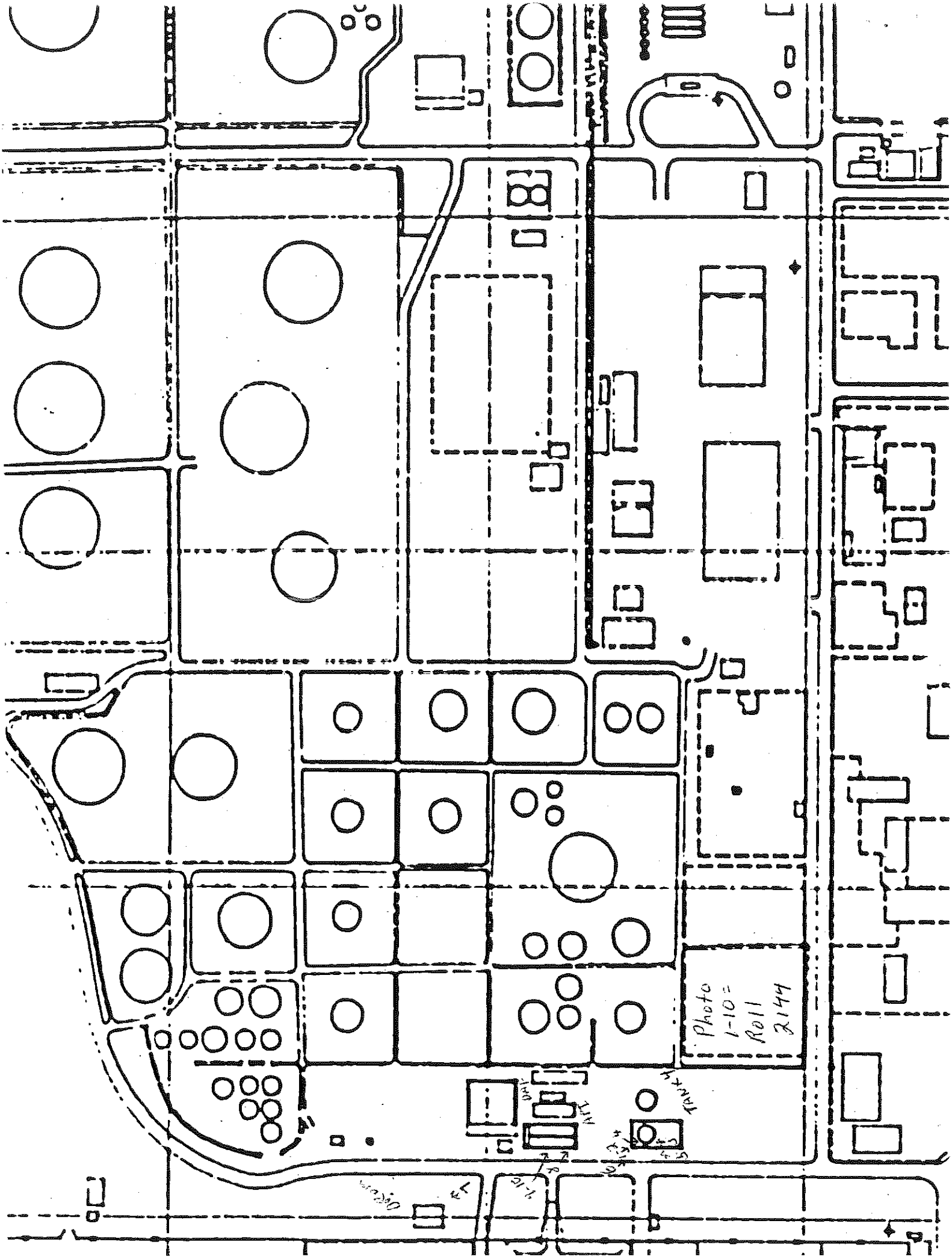
| Sample Number | Depth (feet) | TPH | Chromium | Lead | Benzene | Ethyl benzene | Toluene | Xylenes |
|---|---|---|---|---|---|---|---|---|
| GB - 1 | 2'-6' | 730 | 15.0 | 48.0 | BDL | BDL | BDL | BDL |
| GB - 1 | 18'-22' | BDL | 7.3 | 3.0 | BDL | BDL | BDL | BDL |
| GB - 2 | 4'-6' | 23,000 | 200 | 96 | 0.50 | 1.5 | 0.27 | 6.9 |
| GB - 2 | 18'-22' | BDL | 13.0 | 6.9 | 0.005 | BDL | 0.006 | 0.003 |
| GB - 3 | 4'-8' | BDL | 8.8 | 12.0 | BDL | 0.004 | BDL | 0.019 |
| GB - 3 | 24'-28' | BDL | 3.5 | 1.8 | BDL | BDL | BDL | BDL |
| GB - 4 | 4'-8' | 3,500 | 19.0 | 900 | 0.035 | 0.003 | 0.30 | 0.017 |
| GB - 4 | 14'-18' | BDL | 16.0 | 11.0 | 0.024 | BDL | 0.019 | BDL |
| LP - 1 | 8'-12' | 27 | 9.2 | 12.0 | 0.005 | BDL | BDL | BDL |
| LP - 1 | 26'-30' | 2,700 | 6.4 | 4.2 | 0.027 | 0.65 | 0.042 | 2.0 |
| LP - 2 | 4'-8' | BDL | 13.0 | 11.0 | 0.008 | BDL | 0.006 | BDL |
| LP - 2 | 22'-26' | 27 | 8.9 | 2.5 | 0.003 | BDL | 0.003 | BDL |
| LP - 3 | 6'-10' | 65 | 12.0 | 4.4 | 0.010 | BDL | 0.005 | BDL |
| LP - 3 | 16'-20' | 20 | 7.7 | 2.1 | BDL | BDL | BDL | BDL |
| LP - 4 | 4'-6' | 110 | 110 | 36.0 | 0.007 | BDL | 0.004 | BDL |
| LP - 4 | 24'-28' | 37 | 6.7 | 2.2 | BDL | BDL | BDL | BDL |

TPH - Total Petroleum Hydrocarbons
BDL - Below Detectable Levels

# SKINNER LIST ANALYSIS OF SOILS

| Skinner Analysis | Total Constituent Concentrations in Composite Samples of Soils | |
|---|---|---|
| | Guard Basin Soil (mg/kg) | Lime Pit Soil (mg/kg) |
| Arsenic | 2 | BDL |
| Barium | 140 | 110 |
| Beryllium | 0.34 | BDL |
| Chromium | 8.9 | 27 |
| Cobalt | 13 | 6.5 |
| Lead | 740 | 6.4 |
| Nickel | 13 | 9.9 |
| Vanadium | BDL | 27 |
| Benzene | 0.098 | 0.76 |
| Ethyl benzene | 0.03 | 0.071 |
| Methyl ethyl ketone | 0.021 | 0.18 |
| Toluene | 0.099 | 0.3 |
| Xylene | 0.17 | 0.16 |
| Benzo(a)anthracene | 9.9 | BDL |
| Benzo(b)fluoranthene | 5.3 | BDL |
| Benzo(a)pyrene | 4.6 | BDL |
| Chrysene | 39 | BDL |
| Fluoranthene | 3.5 | BDL |
| Methyl chrysene | 15 | ND |
| 1-Methyl naphthalene | ND | 4 |
| Naphthalene | BDL | 2.1 |
| Phenanthrene | 8.6 | BDL |
| Pyrene | 39 | BDL |

Other Skinner List constituents were not detected in the samples.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Roll
2144

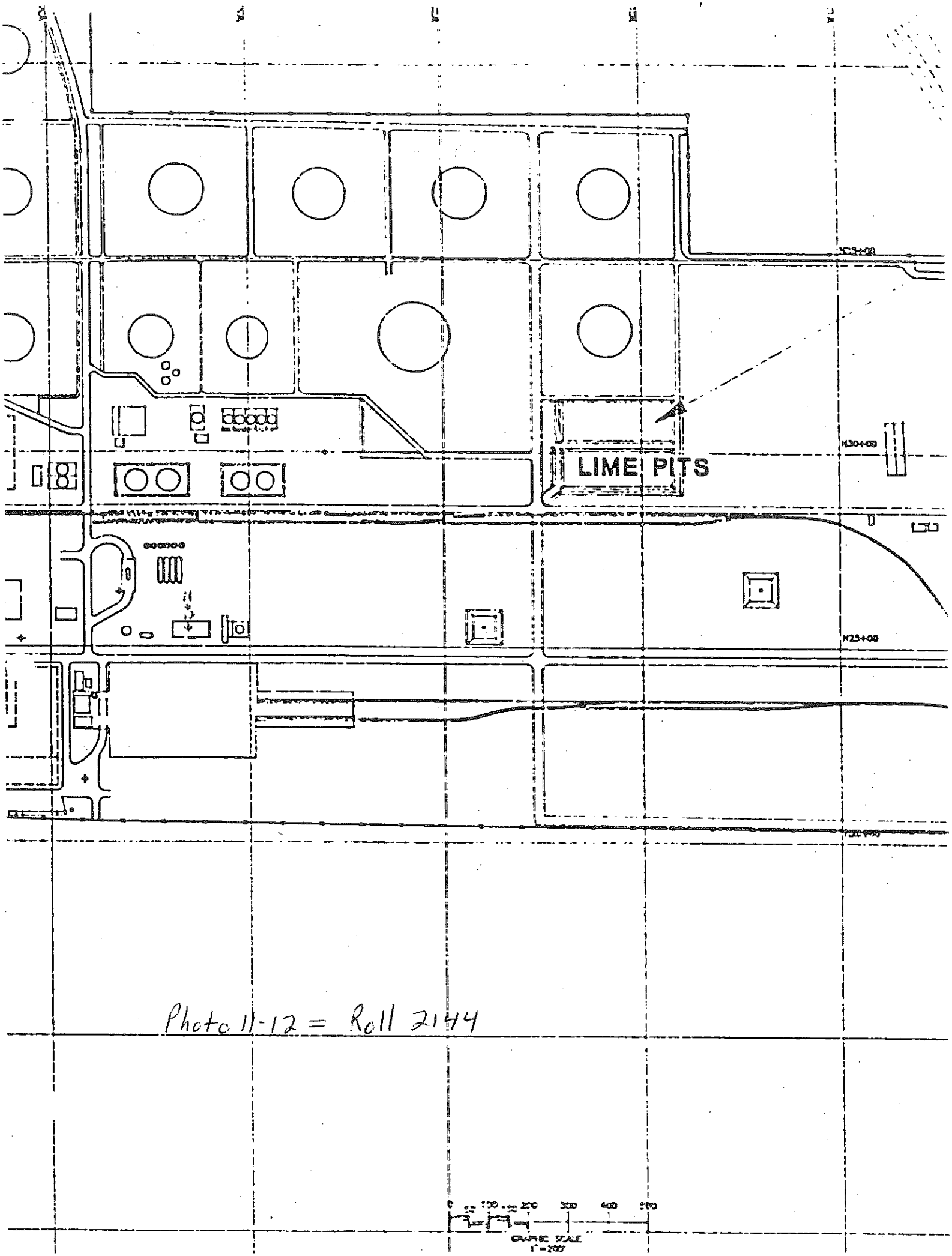
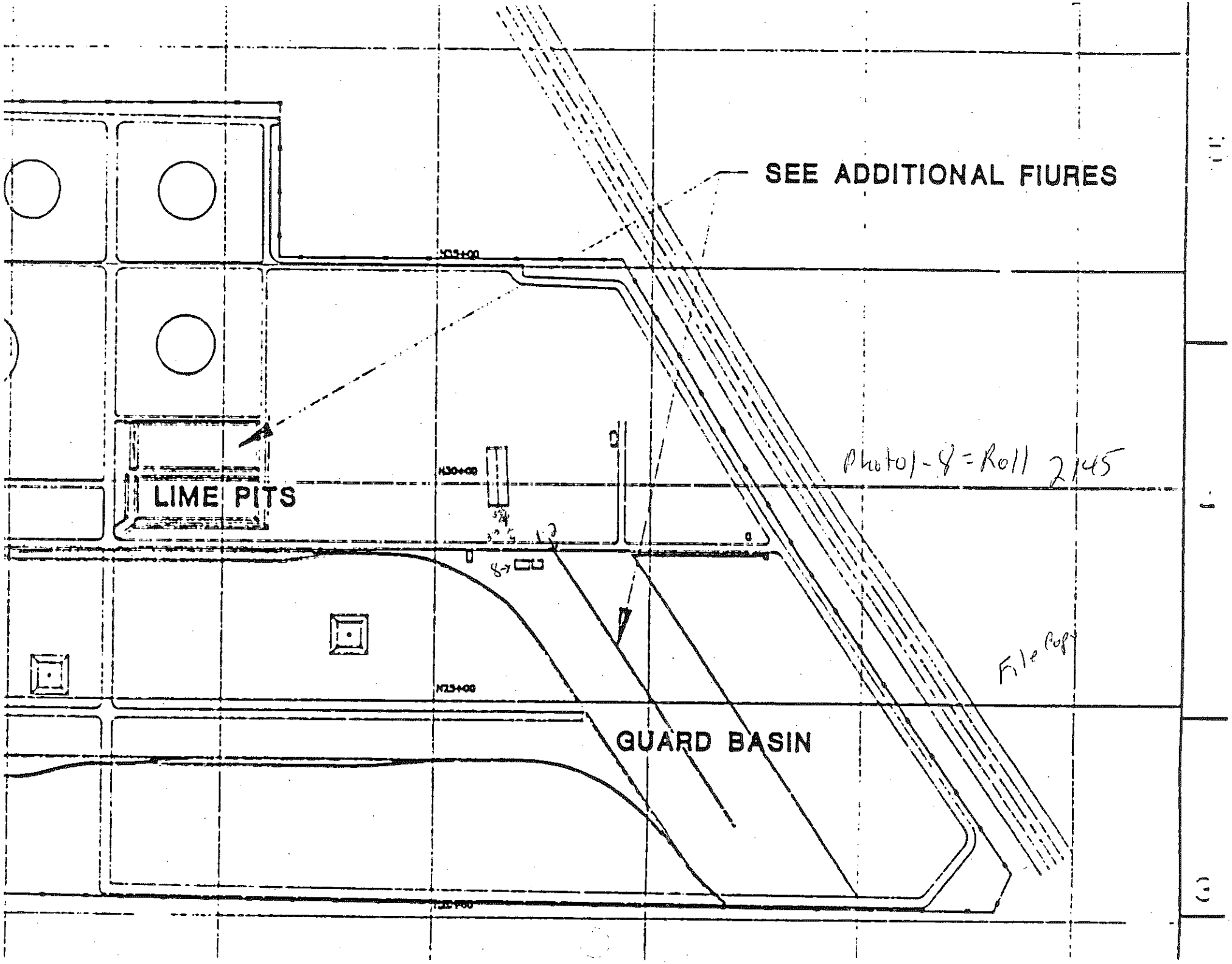



Photo 11-12 = Roll 2144


SEE ADDITIONAL FIURES
LIME PITS
GUARD BASIN
Photo 1-8 = Roll 2145
File Copy

STATE OF ILLINOIS — ENVIRONMENTAL PROTECTION AGENCY DIVISION OF LAND POLLUTION CONTROL

SAFETY-KLEEN CORP. P.O. BOX 19276 SPRINGFIELD, ILLINOIS 62794-9276 (217) 782-6761

STATE PRESCRIBED FORM State Form LPC 62 8/81 IL532-0610 FOR SHIPMENT OF HAZARDOUS AND SPECIAL WASTE.

5-160-02

NOTE: FORM DESIGNED TO PRINT 8 LINES PER INCH EPA Form 8700-22 (6-89) Form Approved. OMB No. 2050-0039 Expires 9-30-92

# UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: ILD 041889023
Manifest Document No.: 77637
2. Page 1 of 1
Information in the shaded areas is not required by Federal law, but is required by Illinois law.

3. Generator's Name and Mailing Address
CLARK
ATTN JOHN MEYER 502 BUILDING
HARTFORD IL 62048

4. Generator's Phone ( 618 000-0000

A. Illinois Manifest Document Number: IL 5231860 MANIFEST FEE PAID

B. Illinois Generator's ID: 1190500002

5. Transporter 1 Company Name: SAFETY-KLEEN CORP.
6. US EPA ID Number: ILD 051060408

C. Illinois Transporter's ID: 1123
D. (618 398-6880 Transporter's Phone

7. Transporter 2 Company Name
8. US EPA ID Number

E. Illinois Transporter's ID
F. ( ) Transporter's Phone

9. Designed Facility Name and Site Address
SAFETY-KLEEN CORP.
20 TUCKER DRIVE
CASEYVILLE, IL 62232
10. US EPA ID Number
5-160-02
ILD 981097819

G. Illinois Facility's ID: 1630250007
H. Facility's Phone: (618 398-6880

GENERATOR

| 11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number) | 12. Containers No. | Type | 13. Total Quantity | 14. Unit Wt/Vol | I. Waste No. |
|---|---|---|---|---|---|
| a. WASTE PETROLEUM NAPHTHA COMBUSTIBLE LIQUID UN1255(D001)(ERG #27) | 002 | DM | 00037 | G | EPA HW Number X X D001; Authorization Number 000004 |
| b. | | | | | EPA HW Number X X; Authorization Number |
| c. | | | | | EPA HW Number X X; Authorization Number |
| d. | | | | | EPA HW Number X X; Authorization Number |

J. Additional Descriptions for Materials Listed Above
I(A) D039 D018

K. Handling Codes for Wastes Listed Above in Item #14
G = Gallons Y = Cubic Yards

15. Special Handling Instructions and Additional Information 9210 36989606 577637 5-160-02-3082 2106
(G-MO#)- IF UNABLE TO DELIVER RETURN TO GENERATOR. MO TRANSP. ID H-1273
EMERGENCY RESP#708-888-4660 24HR
SKDOT# A: 501 B: C: D:

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations, and Illinois regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: Richard Thomas
Signature: Richard Thomas
Date: Month Day Year 03 03 92

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: MICHAEL OZANIC
Signature: Michael Ozanic
Date: Month Day Year 03 03 92

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name
Signature
Date: Month Day Year

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.
Printed/Typed Name: Dina Payne
Signature: Dina Payne
Date: Month Day Year 03 03 92

This Agency is authorized to require, pursuant to Illinois Revised Statutes 1989, Chapter 111½ Section 1004 and 102, that this information be submitted to the Agency. Failure to provide the information may result in a civil penalty against the owner or operator not to exceed $25,000 per day of violation. Falsification of this information may result in a fine up to $50,000 per day of violation and imprisonment up to 5 years. This form has been approved by the Forms Management Center.

COPY 1. TSD MAIL TO GENERATOR

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF SOLID AND HAZARDOUS WASTE MANAGEMENT
P.O. Box 7035
Indianapolis, IN 46207-7035

7/13/92

**PLEASE PRINT OR TYPE** (Form designed for use on elite (12-pitch) typewriter) Form Approved OMB No. 2050-0039 Expires 9-30-

# UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No: ILD041889023 — Manifest Document No.: 000071
2. Page 1 of 1 — Information in the shaded areas is not required by Federal law, but items D, F, H and I are required by State law.

3. Generator's Name and Mailing Address:
Clark Oil & Refining Corp.
P.O. Box 7
Hartford, IL 62048

A. State Manifest Document Number: INA 0624516
B. State Generator's ID: 1190500002

4. Generator's Phone (618) 254-7301

5. Transporter 1 Company Name: Beelman Transportation
6. Use EPA ID Number: ILD007814825
C. State Transporter's ID: 0093
D. Transporter's Phone: 618-452-8187

7. Transporter 2 Company Name:
8. Use EPA ID Number:
E. State Transporter's ID:
F. Transporter's Phone:

9. Designated Facility Name and Site Address:
Chemical Waste Management of Indiana
4636 Adams Center Road
Ft. Wayne, Indiana

10. Use EPA ID Number: IND078911146
G. State Facility's ID: IND078911146
H. Facility's Phone: 219-447-5585

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)
12. Containers: No. / Type
13. Total Quantity
14. Unit Wt./Vol.

a. R.Q., Hazardous Waste Solids, N.O.S., ORM-E, NA 9189, (F037, F038), R.Q. 1lb — 001 DT 44060 lbs F037, F038

RECEIVED
JUL 26 1993
IEPA-DLPC

15. Additional Description for Materials Listed Above
Primary & Secondary Solids-oily ditch clean-up
MSDS available: Emergency phone - Chemtrec 800-424-9300 AF0505 ACL
D81 Net 43980#

16. Special Handling Instructions and Additional Information
Guide NBR 31 In case of emergency call CWM-Emelle, AL 205-652-9721
WO # ~~3110~~ 31160

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Printed/Typed Name: Richard Thomas — Signature: Richard Thomas — 07 06 92

18. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: Jeff Copple — Signature: Jeff Copple

19. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name: — Signature:

20. Discrepancy Indication Space

21. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 20
Printed/Typed Name: Sandy [illegible] — Signature: [illegible] — 07 07 92

EPA Form 8700-22
Previous editions are obsolete
State Form 11865 (R-4-89)

COPY 4. TSD MAIL TO GENERATOR

In case of a spill call the Indiana Office of Environmental Response at 317/241-4336 (day or night) and the National Response Center at 800/424-8802 or 202/426-2675.

INA 0624516

STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF LAND POLLUTION CONTROL

TELEPHONE CONVERSATION RECORD

Madison COUNTY - LPC

Hartford / Clark Oil & Refining SITE INVENTORY NO. ILD041889 / 1190500002

Re: Well logs from the eight wells recently installed at Clark.

Conservation With: Kevin Reinhard, Senior Project Geologist Heritage

(✓) I Called Party ( ) Party Called Me DATE: 2/24/93 TIME: 3:15p

What I Said:

I am finishing a report on the Clark drilling activities, and I wondered whether you had completed the well logs.

I'm going to meet with my supervisor before I pursue this matter any further. Do you have the originals?

Hold on to them. We may need them at a later date. Thank you for your time.

What Other Party Said:

I have them finished, but Clark told me they didn't want me to send them to you. They would mail them to the EPA at a later date.

Yes.

Gina Searcy

Title: EPS I

LPC 10 1/79 3,000

STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY

TELEPHONE CONVERSATION RECORD

Madison
COUNTY

Land Pollution Control
DIVISION

Hartford / Clark Oil & Refining I. D. or FILE NO. ILD041889[illegible] 11905000[illegible]

Re: Groundwater Monitoring Well Installation

Conversation with: Kevin Reinhard - Senior Project Geologist

( ) I Called Party ( ) Party Called Me DATE 2/1/93 TIME 9:45a.

( ) Complainant ( ) Violator ( ) Public Inquiry ( ) Partitioner

What I Said:

Could you tell me your drilling schedule for this week?

Did you begin drilling the fifth well on Friday?

I am writing a report to turn into Springfield, and need to know if you installed any wells with modified risers which contain stainless steel casing up to 5 feet above the

What Other Party Said:

We will be drilling on Tuesday, Wednesday and Thursday. It's taking one whole day per well.

No, they were busy grouting the rest of the afternoon.

RECEIVED
- 2 MAR 1993
IEPA/DLPC

use reverse side if necessary

[signature]
Signature

LSCT
Title

IL 532-0727
EPA 129 (Rev. 1/81)

STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF LAND POLLUTION CONTROL

TELEPHONE CONVERSATION RECORD

Madison COUNTY - LPC

Hartford / Clark Oil & Refining SITE INVENTORY NO. 1190500002

Re: Groundwater Sampling

Conservation With: Richard Thomas, Environmental Engineer

( ) I Called Party (✓) Party Called Me and I returned call DATE: 2/4/93 TIME: 1:50 p

What I Said:

No, I'm not going to split samples during this round of groundwater sampling.

I personally cannot tell you what to do in this situation, but I do believe there is a good chance Springfield will not accept the data due to your SAP not being approved.

Please call me when you decide to conduct your round of sampling.

What Other Party Said:

We were planning on sampling the wells next week, did you plan on coming out.

Do you think we should hold up on the sampling?

I talked with Jerry Kuhn & Terry Meyers of Springfield and they said we should receive a response soon. I think we'll hold off till then.

Okay, we will do that.

Gina G. Search

Title: LSCT

LPC 10 1/79 3,000

*Illinois Environmental Protection Agency*
*Division of Land Pollution Control*

# RCRA INSPECTION REPORT

| | |
|---|---|
| USEPA #: ILD 041889023 | IEPA #: 1190500002 |
| Facility Name: Clark Oil and Refining Corp. | Phone #: 618/254-7301 |
| Street Address: Hawthorne Street P.O. Box 7 | County: Madison |
| City: Hartford | State: Illinois / Zip: 62048 |
| Region: 6 / Inspection Date: 1/28/93 | From: 10:15a To: 12:00p |
| Weather: clear, dry ≈ 40° | 1/29/93 9:15a 12:00p; 2/2/93 9:30a 1:30p; 2/3/93 9:30a 3:00p |

**TYPE OF FACILITY**

| | |
|---|---|
| Notified As: Generator | Regulated As: G/SD |
| LDF? yes (Yes or No) HPV? yes | 90-Day F/U Required?: YES ____ NO ____ |

**TYPE OF INSPECTION**

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

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: 8/18/80, from (initial) or (subsequent) Notification.

Initial Part A Date: 11/18/80 Amended: __/__/__

Part A Withdrawal requested: 11/23/82 Approved by (US) (IL) EPA: 2/15/83

**PART B PERMIT APPLICATION**

Part B Permit Submitted: Y or (N) __/__/__ Final Permit Issued: __/__/__

**ENFORCEMENT**

Has the firm been referred to -- USEPA: Y or (N) __/__/__

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

**ORDERS ISSUED**

CACO: __/__/__ CAFO: __/__/__ 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 1991 | 19 | 19 |
|---|---|---|---|---|---|---|---|---|---|
| S04 | no | no | yes | no | no | no | no | | |
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RECEIVED
- 2 MAR 1993
IEPA/DLPC

OPERATOR

| | |
|---|---|
| Name Clark Oil and Refining | Name |
| Address 8182 Maryland Ave. | Address |
| City St. Louis | City |
| State MO Zip 63105 | State Zip |
| Phone # (314) 889-9600 | Phone # |

| PERSON(S) INTERVIEWED | TITLE | PHONE # |
|---|---|---|
| Bill Irwin | Environmental Manager | (618) 254-7301 |
| Richard Thomas | Environmental Engineer | (618) 254-7301 |
| | | |
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| INSPECTION PARTICIPANT(S) | AGENCY/TITLE | PHONE # |
|---|---|---|
| Gina Search | IEPA/LSCT | (618) 346-5120 |
| Chris Calmodsky | IEPA/EPS II | (618) 346-5120 |
| | | |
| | | |

| PREPARED BY | AGENCY/TITLE | PHONE # |
|---|---|---|
| Gina Search | IEPA/LSCT | (618) 346-5120 |

# SUMMARY OF APPARENT VIOLATIONS

| Area | Class | Section |
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To: Division File

From: Gina Search--FOS--Collinsville

Date: 2/16/93

Re: Clark Oil & Refining Well Installation and Soil Sampling Procedures

On January 27, 1993 the Collinsville regional office was contacted by a reporter from the Alton Telegraph. She was questioning drilling activities being conducted at the Clark Oil & Refining facility. This writer contacted Bill Irwin, Clark's environmental manager, and he explained that these activities were being conducted according to the Sampling and Analysis Plan submitted by Clark to the IEPA in November.

While reviewing Clark's November 1992 Sampling and Analysis Plan, this writer noticed that their well installation plan called for PVC screens and casings for the groundwater monitor wells. Due to the facility's waste streams and list of chemical parameters to be monitored, stainless steel screens and casing should be utilitized at this facility to minimize well material interference.

On January 28, 1993 Jerry Kuhn of IEPA was informed of Clark's activities. He explained that Clark's Sampling and Analysis Plan had not yet been approved, and that the data generated by this investigative study may not be accepted by the Agency. Mr. Kuhn suggested this writer further pursue this matter by observing the ongoing well installations and soil sampling procedures.

At 1015 hours on January 28, 1993 this writer and Chris Cahnovksy met with Bill Irwin at the Clark facility. After an hour of safety orientation, we were allowed to enter the site. Bill Irwin explained that the ongoing investigation was for their own benefit so they would know how to proceed, but they also intended to submit this information to the Agency. This writer explained that their Sampling and Analysis Plan had not been approved, and there was the possibility that soil and groundwater data generated by these activities would not be accepted by the agency. If the investigation was solely for their own purpose, they could take whichever avenue they chose.

At 1130 hours the drillers were completing the installation of well number GB4. This was the fourth well around the guard basin that had been installed. Senior project geologist, Kevin Reinhard, explained that wells GB1, GB2, and GB3 had been installed during the previous two weeks. Mr. Reinhard provided information concerning wells depths and groundwater levels. Well GB1 was drilled to a depth of 40 feet, and groundwater was encountered in the borehole at 32 ft. Well GB2 was drilled to a depth of 40.5 feet, and groundwater was encountered in the borehole at 33 feet below the surface. Well GB3 was drilled to a depth of 42 feet and

the groundwater was encountered in the borehole at 34 feet below the surface.

Mr. Reinhard described Well GB4 construction consisting of a ten foot stainless steel screen being placed at 42.5 feet below the surface. The groundwater was encountered at 35 feet in the borehole, and this placement allowed 2.5 foot of stainless steel screen to extend above the water. PVC casing extended from the top of the screen to two and one-half feet above the surface. He stated that the materials used in the well construction for GB1, GB2 and GB3 were the same as those used in GB4. Surface casing was installed in wells GB2 and GB4 to prevent the migration of contaminants from the surface or intermediate zone into the well screens. Wells GB1, GB2, GB3, and GB4 were inspected and photographed.

Mr. Irwin explained that Clark had not received any communication from the Agency, so they went ahead with their plan to meet their scheduled deadlines. He stated that the sludge sampling had already been completed according to their sampling and analysis plan procedures. Mr. Irwin asked if the Agency would approve the wells in their current state. This writer stated that Mr. Jerry Kuhn should be contacted for confirmation on this matter. Mr. Irwin decided to stop the well installation activities and to contact Springfield before continuing. Mr. Irwin asked this writer if it would be possible to install three and one-fourth inch stainless steel casing around the already installed two inch PVC casing. This writer explained that this would not prevent the groundwater from coming in contact with the PVC material, but the permit section should be questioned on this matter for clarification.

On January 28, 1993 at 1400 hours, this writer reported the inspection results to Mr. Jerry Kuhn. Mr. Kuhn had an earlier conversation with Clark Oil during which they described their monitor well design as being modified to include five feet of stainless steel screen and casing extending directly above the water table to account for seasonal fluctuations. This description did not coincide with this writer's finding per discussion with the professional geologist working on the project.

On January 29, 1993 this writer arrived at the Clark drilling site and was informed of the well design change. The remaining four wells would be installed with stainless steel casing extending from the screen to the surface. Well LP2 was being installed with a ten foot stainless steel screen being set at 40 ft below ground surface; the groundwater was encountered in the borehold at 32 feet below ground surface. Stainless steel casing extended from the top of the screen to two and one-half feet above ground surface.

While installing the wells, continuous soil samples were obtained using split spoon samplers. Mr. Reinhard, Heritage's project geologist, scanned the cores using an PID to detect the presence of organic vapors. The cores displaying the highest level of organic

vapors and visual or olfactory evidence of waste were selected for analysis. To maintain sample integrity, the samples were stored on ice.

On February 2, 1993 at 1015 hours this writer arrived on site to observe the installation of well LP3. The location had been moved approximately 25 feet eastward due to the thick mud encountered at the original location. Groundwater was encountered in the borehole at approximately 31.5 to 32 feet below ground surface. The bottom of the well was set at 40 feet below ground surface. A ten foot stainless steel screen and full stainless steel casing were installed for this well. PID readings were low, and no odors were detected in the soil samples.

LP1 was installed on 2/3/93. In the samples retrieved from the 2-4 feet below surface borings, Mr. Rinehard detected a slight gasoline odor. This odor was again present in the samples retrieved in the 4-6 feet borings. At 6-8 feet below surface a definite gasoline odor was detected in the sample. The odor was present in all the samples taken to 36 feet below surface where the last obtainable sample was collected. The well bottom was set at 41 feet. Groundwater was encountered in the borehole at approximately 30-32 feet. A surface casing was not installed in this well do to contamination being present through the depth of the well. The well was constructed with 15 feet of stainless steel screen and stainless steel casing that extended two and one-half feet above ground surface.

After installing well LP1 the drilling equipment was deconned. Equipment blanks taken at 1320 hours, and drilling of well LP4 began at 1330 hours. There was no contamination detected during the observed drilling activities.

cc: Charlie Northrup
Jerry Kuhn
Terry Myers
Collinsville-BOL

*Illinois Environmental Protection Agency*
*Division of Land Pollution Control*

# RCRA INSPECTION REPORT

| | |
|---|---|
| USEPA #: IL D004189023 | IEPA #: 1190500002 |
| Facility Name: Clark Oil & Refining Corp | Phone #: 618/254-7301 |
| Street Address: Hawthorne Street P.O. Box 7 | County: Madison |
| City: Hartford | State: Illinois Zip: 62048 |
| Region: 6 | Inspection Date: 10/28/92 From: 9:30 To: 10:45am |
| Weather: | |

## TYPE OF FACILITY

| | |
|---|---|
| Notified As: G | Regulated As: G/SD |
| LDF? yes (Yes or No) HPV? yes | 90-Day F/U Required?: YES _____ NO _____ |

## TYPE OF INSPECTION

CEI: _____ Sampling: _____ Citizen Complaint: _____ Closed: _____ Other: _____

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

## NON-REGULATED STATUS

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

## PART A

Notification Date: 8/18/80, from (initial) or (subsequent) Notification.

Initial Part A Date: 11/18/80 Amended: ___/___/___

Part A Withdrawal requested: 11/23/82 Approved by (US) (IL) EPA: 12/15/83

## PART B PERMIT APPLICATION

Part B Permit Submitted: Y or (N) ___/___/___ Final Permit Issued: ___/___/___

## ENFORCEMENT

Has the firm been referred to -- USEPA: Y or (N) ___/___/___

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

## ORDERS ISSUED

CACO: ___/___/___ CAFO: ___/___/___ 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 1991 | 19 | 19 |
|---|---|---|---|---|---|---|---|---|---|
| S04 | no | no | yes | no | no | no | no | | |
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| OWNER | | OPERATOR | |
|---|---|---|---|
| Name | Clark Oil and Refining | Name | Same |
| Address | 8182 Maryland Ave. | Address | |
| City | St. Louis | City | |
| State | Mo | State | |
| Zip | 63105 | Zip | |
| Phone # | (314) 889-9600 | Phone # | |

| PERSON(S) INTERVIEWED | TITLE | PHONE # |
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| INSPECTION PARTICIPANT(S) | AGENCY/TITLE | PHONE # |
|---|---|---|
| Chris Cahnovsky | IEPA / EPS | 618/346-5120 |
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| | | |

| PREPARED BY | AGENCY/TITLE | PHONE # |
|---|---|---|
| [signature] | IEPA / EPS | 618/346-5120 |

# SUMMARY OF APPARENT VIOLATIONS

| Area | Class | Section |
|---|---|---|
| DOR | 1 | 703.121(a) |
| DOR | 1 | 703.150(a) |
| DGS | 1 | 725.113(b) |
| DMR | 2 | 725.175 |
| DGW | 1 | 725.190(a) |
| DGW | 1 | 725.191(a) |
| DGW | 1 | 725.192(a) |
| DCL | 1 | 725.212(a) |
| DCL | 1 | 725.218(a) |
| DFR | 1 | 725.242(a) |
| DFR | 1 | 725.244(a) |
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1190500002 - Madison County
Clark Oil and Refining Corp.
ILD041889023

## REMARKS

A record review of the Field Operations Section files was conducted on October 28, 1992. This review was prompted by an October 27, 1992, meeting between Mike Grant and Chris Cahnovsky representing the IEPA and Richard Thomas representing Clark Oil.

Mr. Thomas informed IEPA personnel that primary sludges under RCRA listing F037 and F038 had not been adequately diverted from Clark's stormwater basin and ancillary ditches. This basin is known as the guard basin. There were also questions raised regarding the lime pits at this facility having been impacted with F037 and F038. In 1990, a fire pond was constructed, so the guard basin could be taken out of service. Clark installed sumps to prevent process water from entering the guard basin. By Clark's own admission they were not successful at the diversion of F037 and F038 from the guard basin. Due to this information, clark is regulated as a Land Disposal Facility for storage of hazardous waste in a surface impoundment.

As a result of this record review the following violations are being alleged:

| | |
|---|---|
| 703.121 (a) | 725.192 (a) |
| 703.150 (a) | 725.212 (a) |
| 725.113 (b) | 725.218 (a) |
| 725.175 | 725.242 (a) |
| 725.190 (a) | 725.244 (a) |
| 725.191 (a) | |

Illinois Environmental Protection Agency · P.O. Box 19276, Springfield, IL 62794-9276

217/782-6761

CERTIFIED MAIL
435 091 855

December 23, 1992

Clark Oil & Refining Corp.
Attn: Richard Thomas, Environmental Engineer
Post Office Box 7
Hartford, Illinois 62048-0007

Re: COMPLIANCE INQUIRY LETTER
1190500002 -- Madison County
Clark Oil & Refining Corp.
ILD041889023
Compliance File

Dear Mr. Thomas:

The purpose of this letter is to address the status of the above-referenced facility in relation to the requirements of Part 703, Subpart(s) A through D and Part 725, Subparts B, E through H, and K and to inquire as to your position with respect to the apparent violations identified in Attachment A and your plans to correct these apparent violations. The Agency's findings of apparent non-compliance in Attachment A are based on an October 28, 1992 review of documents.

Please submit in writing, within fifteen (15) calendar days of the date of this letter, the reasons for the identified violations, a description of the steps which have been taken to correct the violations and a schedule, including dates, by which each violation will be resolved. The written response, and two copies of all documents submitted in reply to this letter, should be sent to the following:

Deanne Virgin
Compliance Unit
Planning and Reporting Section
Illinois Environmental Protection Agency
Division of Land Pollution Control
2200 Churchill Road
Post Office Box 19276
Springfield, Illinois 62794-9276

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

If you have any questions regarding the above, please contact Mike Grant or Chris Cahnovsky at 618/346-5120.

Sincerely,

Brian S. White, Manager
Compliance Unit
Planning and Reporting Section
Division of Land Pollution Control

BSW:CNC:DV:rlc/2962r,72-73

cc: USEPA Region V

Attachment A

1. Pursuant to 35 Ill. Adm. Code 703.121(a), no person shall conduct any hazardous waste storage, hazardous waste treatment or hazardous waste disposal operation:

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

   2. In violation of any condition imposed by a RCRA permit.

   You are in apparent violation of 35 Ill. Adm. Code 703.121(a) for the following reason(s): Failure to obtain a permit for the storage of F037 and F038 in a surface impoundment.

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

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

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

   3. For generators which generate greater than 100 kilograms but less than 1000 kilograms of hazardous waste in a calendar month and treat, store or dispose of these wastes on-site, by March 24, 1987.

   You are in apparent violation of 35 Ill. Adm. Code 703.150(a) for the following reason(s): Failure to submit a Part A permit application upon the listing date of F037.

3. Pursuant to 35 Ill. Adm. Code 725.113(b), the owner or operator shall develop and follow a written waste analysis plan which describes the procedures which the owner or operator will carry out to comply with subsection (a). The owner or operator shall keep this plan at the facility. At a minimum, the plan must specify:

   1. The parameters for which each hazardous waste will be analyzed and the rationale for the selection of these parameters (i.e., how analysis for these parameters will provide sufficient information on the waste's properties to comply with subsection (a);

   2. The test methods which will be used to test for these parameters;

3. The sampling method which will be used to obtain a representative sample of the waste to be analyzed. A representative sample may be obtained using either:

   A. One of the sampling methods described in 35 Ill. Adm. Code 721. Appendix A or

   B. An equivalent sampling method.

   (Board Note: See 35 Ill. Adm. Code 720.120(c) for related discussion.)

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;

5. For off-site facilities, the waste analyses that hazardous waste generators have agreed to supply;

6. Where applicable, the methods which will be used to meet the additional waste analysis requirements for specific waste management methods as specified in Sections 725.293, 725.325, 725.352, 725.373, 725.414, 725.441, 725.475 and 725.502, and 35 Ill. Adm. Code 728.107; and

7. For surface impoundments exempted from land disposal restrictions under 35 Ill. Adm. Code 728.104(a), the procedures and schedules for:

   A) The sampling of impoundment contents;

   B) The analysis of test data; and,

   C) The annual removal of residues which are not delisted under 35 Ill. Adm. Code 720.122 and do not exhibit a characteristic of hazardous waste, and which do not meet the standards of 35 Ill. Adm. Code 728, Subpart D or, where no treatment standards have been established, the annual removal of residues which do not meet the applicable prohibition levels in 35 Ill. Adm. Code 728, Subpart C.

You are in apparent violation of 35 Ill. Adm. Code 725.113(b) for the following reason(s): Failure to develop a waste analysis plan for waste stored in a surface impoundment.

4. Pursuant to 35 Ill. Adm. Code 725.175, the owner and operator shall prepare and submit a single copy of an annual report to the Agency by March 1 of each year. The report form and instructions supplied by the Agency must be used for this report. The annual report must cover facility activities during the previous calendar year and must include the following information:

a. The USEPA identification number (Section 725.111), name and address of the facility;

b. The calendar year covered by the report;

c. For off-site facilities, the USEPA identification number of each hazardous waste generator from which the facility received a hazardous waste during the year; for imported shipments, the report must give the name and address of the foreign generator;

d. A description and the quantity of each hazardous waste the facility received during the year. For off-site facilities this information must be listed by USEPA identification number of each generator;

e. The method of treatment, storage or disposal for each hazardous waste;

f. Monitoring data under Section 725.194(a)(2)(B) and (C) and (b)(2) where required;

g. The most recent closure cost estimate under Section 725.242 and for disposal facilities the most recent post-closure cost estimate under Section 725.244;

h. For generators which treat, store or dispose of hazardous waste on-site, a description of the efforts undertaken during the year to reduce the volume and toxicity of the waste generated;

i. For generators which treat, store or dispose of hazardous waste on-site, a description of 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; and

j. The certification signed by the owner or operator of the facility or the owner or operator's authorized representative.

You are in apparent violation of 35 Ill. Adm. Code 725.175 for the following reason(s): Failure to submit an annual report.

5. Pursuant to 35 Ill. Adm. Code 725.190(a), the owner or operator of a surface impoundment, landfill or land treatment facility which is used to manage hazardous waste must implement a groundwater monitoring program capable of determining the facility's impact on the quality of groundwater in the uppermost aquifer underlying the facility, except as Section 725.101 and paragraph (c) provide otherwise.

You are in apparent violation of 35 Ill. Adm. Code 725.190(a) for the following reason(s): Failure to implement a ground water monitoring program for the surface impoundment storing hazardous waste.

6. Pursuant to 35 Ill. Adm. Code 725.191(a), a groundwater monitoring system must be capable of yielding groundwater samples for analysis and must consist of:

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

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

      B. Not affected by the facility; and

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

   You are in apparent violation of 35 Ill. Adm. Code 725.191(a) for the following reason(s): Failure to implement a ground water monitoring system pursuant to this section.

7. Pursuant to 35 Ill. Adm. Code 725.192(a), the owner or operator must obtain and analyze samples from the installed groundwater monitoring system. The owner or operator must develop and follow a groundwater sampling and analysis plan. He must keep this plan at the facility. The plan must include procedures and techniques for:

   1. Sample collection;

   2. Sample preservation and shipment;

   3. Analytical procedures; and

   4. Chain of custody control.

   You are in apparent violation of 35 Ill. Adm. Code 725.192(a) for the following reason(s): Failure to implement to develop a groundwater sampling and analysis plan.

8. Pursuant to 35 Ill. Adm. Code 725.212(a), the owner or operator of a hazardous waste management facility shall have a written closure plan. Until final closure is completed and certified in accordance with Section 725.215, a copy of the most current plan must be furnished to the Agency upon request including request by mail. In addition, for facilities without approved plans, it must also be provided during site inspections on the day of inspection to any officer, employee or representative of the Agency.

You are in apparent violation of 35 Ill. Adm. Code 725.212(a) for the following reason(s): Failure to submit a written closure plan for the surface impoundment storing hazardous waste.

9. Pursuant to 35 Ill. Adm. Code 725.218(a), the owner or operator of a hazardous waste disposal unit shall have a written post-closure plan. An owner or operator of a surface impoundment or waste pile that intends to remove all hazardous wastes at closure shall prepare a post-closure plan and submit it to the Agency within 90 days after the date that the owner or operator or Agency determines that the hazardous waste management unit or facility must be closed as a landfill, subject to the requirements of Sections 725.217 through 725.220.

   You are in apparent violation of 35 Ill. Adm. Code 725.218(a) for the following reason(s): Failure to submit a written post-closure plan for the surface impoundment storing hazardous waste.

10. Pursuant to 35 Ill. Adm. Code 725.242(a), the owner or operator shall have a detailed written estimate, in current dollars, of the cost of closing the facility in accordance with the requirements in Sections 725.211 through 725.215 and applicable closure requirements of Sections 725.297, 725.328, 725.358, 725.380, 725.410, 725.451, 725.481 and 725.504.

    1. The estimate must equal the cost of final closure at the point in the facility's active life when the extent and manner of its operation would make closure the most expensive, as indicated by its closure plan (see Section 725.212(b)); and

    2. The closure cost estimate must be based on the costs to the owner or operator of hiring a third party to close the facility. A third party is a party who is neither a parent nor a subsidiary of the owner or operator. (See definition of "parent corporation" in Section 725.241(d).) The owner or operator may use costs for on-site disposal if the owner or operator can demonstrate that on-site disposal capacity will exist at all times over the life of the facility.

    3. The closure cost estimate must not incorporate any salvage value that may be realized by the sale of hazardous wastes, facility structures or equipment, land or other facility assets at the time of partial or final closure.

    4. The owner or operator shall not incorporate a zero cost for hazardous waste which may have economic value.

    You are in apparent violation of 35 Ill. Adm. Code 725.242(a) for the following reason(s): Failure to submit closure cost estimates for the surface impoundment storing hazardous waste.

11. Pursuant to 35 Ill. Adm. Code 725.244(a), the owner or operator of a hazardous waste disposal unit shall have a detailed written estimate, in current dollars, of the annual cost of post-closure monitoring and maintenance of the facility in accordance with the applicable post-closure regulations in Section 725.217 through 725.220, 725.328, 725.358, 725.380 and 725.410.

    1. The post-closure cost estimate must be based on the costs to the owner or operator of hiring a third party to conduct post-closure care activities. A third party is a party who is neither a parent nor a subsidiary of the owner or operator. (See definition of "parent corporation" in Section 725.241(d).)

    2. The post-closure cost estimate is calculated by multiplying the annual post-closure cost estimate by the number of years of post-closure care required under Section 725.217.

    You are in apparent violation of 35 Ill. Adm. Code 725.244(a) for the following reason(s): Failure to submit post-closure cost estimates for the surface impoundment storing hazardous waste.

CNC:DV:rlc/2962r,74-79

Illinois Environmental Protection Agency
**Division of Land Pollution Control**

# RCRA INSPECTION REPORT

| | |
|---|---|
| USEPA #: IL D 0 4 1 8 8 9 2 0 3 | IEPA #: 1 1 9 0 5 0 0 0 0 2 |
| Facility Name: Clark Oil & Refining Corp. | Phone #: 618/254-7301 |
| Street Address: Hawthorne Street / P.O. Box #7 | County: Madison |
| City: Hartford | State: IL Zip: 62048 |
| Region: 6 | Inspection Date: 5/29/91 From: 9:15 To: 11:00 |
| Weather: Raining ≈90° | |

**TYPE OF FACILITY**

| | |
|---|---|
| Notified As: Generator | Regulated As: G-1 |
| LDF? NO (Yes or No) HPV? NO | 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: 3/21/91 Withdrawal: ____

**NON-REGULATED STATUS**

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

**PART A**

Notification Date: 8/18/80, from (Initial) or (subsequent) Notification.

Initial Part A Date: 11/18/80 Amended: __/__/__

Part A Withdrawal requested: 11/23/82 Approved by (US) (IL) EPA: 12/15/83

**PART B PERMIT APPLICATION**

Part B Permit Submitted: Y or (N) N/A __/__/__ Final Permit Issued: __/__/__

**ENFORCEMENT**

Has the firm been referred to -- USEPA: Y or (N) __/__/__

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

**ORDERS ISSUED**

CACO: __/__/__ CAFO: __/__/__ 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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RECEIVED
- 6 JUN 1991
IEPA/DLPC

| OWNER | | OPERATOR | |
|---|---|---|---|
| Name | Clark Oil & Refining | Name | Same as Owner |
| Address | 8182 Maryland Ave. | Address | |
| City | St. Louis | City | |
| State | MO | State | |
| Zip | 63105 | Zip | |
| Phone # | 314/889-9600 | Phone # | |

| PERSON(S) INTERVIEWED | TITLE | PHONE # |
|---|---|---|
| Richard Thomas | Environmental Eng. | 618/254-7301 |
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| INSPECTION PARTICIPANT(S) | AGENCY/TITLE | PHONE # |
|---|---|---|
| Jeff Schoenbacher | IEPA/EPS | 618/346-5120 |
| | | |
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| PREPARED BY | AGENCY/TITLE | PHONE # |
|---|---|---|
| Jeff Schoenbacher | IEPA/EPS | 618/346-5120 |

# SUMMARY OF APPARENT VIOLATIONS

* Outstanding Violations

| Area | Class | Section | |
|---|---|---|---|
| SPA | I | 722.134(a)(1) | * |
| Spec. | | 725.292 g) | * |
| | | 725.293 F) | * |
| | | 725.294 b) | * |

| Area | Class | Section |
|---|---|---|
| | | |

| Area | Class | Section |
|---|---|---|
| | | |

532-1835
C-335 (12/89) Page 2

## REMARKS

1190500002 - Madison County
Clark Oil and Refining Corporation
ILD041889023

On May 29, 1991, I conducted an inspection at the above mentioned facility. The purpose of this inspection was to resolve the alleged violations cited during the 3/21/91 inspection. Accompanying me during the inspection was Richard Thomas who is an Environmental Engineer for Clark Oil and Refining Corporation.

The following are the violations cited during the March 21, 1991 inspection, which as a result of this follow-up are considered resolved.

722.111 - RESOLVED

Clark Oil submitted lab analysis for the liquid that accumulates at the drum accumulation pad sump. The sample (X201) was analyzed by Environmentrics April 3, 1991. The analysis for this sample exhibited benzene at a level of .539 ppm. This exceeding the maximum TCLP perimeters for benzene. However, since the wastewater is collected in the sump and pumped to the facility's waste water treatment unit, the sump meets the definition of an exempt wastewater treatment tank (725.101 c)10). However Clark will be requested to submit their procedures for handling material that is accumulated in the sump.

721.106 a)3)I) - RESOLVED

Clark Oil addressed the above violation in there CIL response letter dated May 3, 1991. Accompanying the letter was the analysis (Attch. B) for the coke generated at the refinery.

725.116 a) - RESOLVED

During this inspection Mr. Thomas exhibited the revised training program. The revised program addresses hazardous waste tank operations for Tank 4 and T1-18, in addition to the transfer operations between the tanks and vacuum truck.

722.134 c) - RESOLVED

The satellite drum located at Tank 4 was inspected and found to be labeled and closed in accordance with this Section.

809.301 - RESOLVED

Clark Oil explained in there response, that the lime sludge is not sold as a product. Furthermore, the letter states that should the sludge be sold as product a solid waste determination will be submitted to the Agency's permit section for review and approval.

The following apparent violations of Section 722.134 a)1) remain unresolved.

Specifically - 725.292 g) 725.293 f) 725.294 b)

jts:

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W50+00
W45+00
W40+00
WATKINS AVENUE
PLACE
MS 1
STILL 590
STILL 690
STILL 792
STATE AID ROUTE 114

*Illinois Environmental Protection Agency*
*Division of Land Pollution Control*

# RCRA INSPECTION REPORT

| | |
|---|---|
| USEPA #: IL D041889023 | IEPA #: L19050000 2 |
| Facility Name: Clark Oil & Refining Corp | Phone #: 618/254-7301 |
| Street Address: Hawthorne Street P.O. Box #7 | County: Madison |
| City: Hartford | State: IL Zip: 62048 |
| Region: 6 | Inspection Date: 7/19/91 6/24/91 From: 11:21 To: 12:45 |
| Weather: Sunny & Dry ≈ 95 | |

**TYPE OF FACILITY**

| | |
|---|---|
| Notified As: Generator | Regulated As: 6-1 |
| ~~LDF?~~ No ~~HPV?~~ No (Yes or No) | 90-Day F/U Required?: YES ____ NO X |

**TYPE OF INSPECTION**

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

CME/O&M: ____ Record Review: ____ Follow-Up to Inspection of: 3/21/91 Withdrawal: ____

**NON-REGULATED STATUS**

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

**PART A**

Notification Date: 8/18/80, from (initial) or (subsequent) Notification.

Initial Part A Date: 11/18/80 Amended: ___/___/___

Part A Withdrawal requested: 11/23/82 Approved by (US) (IL) EPA: 12/15/83

**PART B PERMIT APPLICATION**

Part B Permit Submitted: Y or (N) ___/___/___ Final Permit Issued: ___/___/___

**ENFORCEMENT**

Has the firm been referred to -- USEPA: Y or (N) ___/___/___

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

**ORDERS ISSUED**

CACO: ___/___/___ CAFO: ___/___/___ 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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RECEIVED
31 JUL 1991
IEPA/DLPC

| OWNER | | OPERATOR | |
|---|---|---|---|
| Name | Clark Oil & Refining Co. | Name | Same as → |
| Address | 8182 Maryland Avenue | Address | ← |
| City | St. Louis | City | |
| State | MO | Zip 63105 | State | Zip |
| Phone # | | Phone # | |

| PERSON(S) INTERVIEWED | TITLE | PHONE # |
|---|---|---|
| Richard Thomas | Environmental Eng. | 618/254-7301 |
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| INSPECTION PARTICIPANT(S) | AGENCY/TITLE | PHONE # |
|---|---|---|
| Schoenbacher | IEPA/EPS | 618/346-5120 |
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| PREPARED BY | AGENCY/TITLE | PHONE # |
|---|---|---|
| Schoenbacher | IEPA/EPS | 618/346-5120 |

# SUMMARY OF APPARENT VIOLATIONS

| Area | Class | Section |
|---|---|---|
| OTH | I | 702. 13(a)(1) |
| | | Spec. 725.292 |
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## REMARKS

1190500002 - Madison County
Clark Oil and Refining Corporation
ILD041889023

On July 19, 1991, I conducted an inspection at the above mentioned facility. The purpose of this inspection was to resolve some of the alleged violations cited during the 3/21/91 inspection. Accompanying me during the inspection was Richard Thomas who is an Environmental Engineer for Clark Oil and Refining Corporation.

The following are the violations cited during the March 21, 1991 inspection, which as a result of this follow-up are considered resolved.

722.134 a)1) * Specifically

*725.293 f) - RESOLVED

During the pre-enforcement conference conducted July 10, 1991, Clark Oil and the Agency agreed that the pipe going in ground on Tank 4 was not a "structural support" but a "pipe". Due to this fact Clark agreed to install a stop blind. During this inspection I observed the pipe fitters installing the blind to prevent any material from flowing through the pipe.

*725.292 g) - UNRESOLVED

Written statements covering the installation of Tank T1-18 were not available at the time of the inspection.

*725.294 - RESOLVED

On July 24, 1991, I verified the installation of the disconnect dry couplings. The couplings were made by Kamvalok and installed to control any drippage that may occur during disconnection. Furthermore, the high level alarm system has been installed and is working properly.

Please note that *725.292 g) remains unresolved. Clark is to submit information concerning Tank T1-18, the documentation is to describe the tanks function in the recycling process. If agreed that this is part of the recycling system this violation will be resolved. This documentation is to be submitted by July 31, 1991.

JTS:

WATKINS AVENUE
PLACE

Illinois Environmental Protection Agency
Division of Land Pollution Control

# RCRA INSPECTION REPORT

| | |
|---|---|
| USEPA #: IL D041889203 | IEPA #: 1190500002 |
| Facility Name: Clark Oil and Refining Corp | Phone #: 618/254-7301 |
| Street Address: Hawthorne Street P.O. Box 7 | County: Madison |
| City: Hartford | State: Illinois Zip: 62048 |
| Region: Southern | Inspection Date: 03/21/91 From: 9:30 To: 12:00 |
| Weather: Sunny, ~70° | |

## TYPE OF FACILITY

| | |
|---|---|
| Notified As: Generator | Regulated As: G-1 |
| LDF? N (Yes or No) HPV? No | 90-Day F/U Required?: YES X 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: 08/28/80, from (initial) or (subsequent) Notification.

Initial Part A Date: 11/18/80 Amended: __/__/__

Part A Withdrawal requested: 11/23/82 Approved by (US) (IL) EPA: 12/15/83

## PART B PERMIT APPLICATION

Part B Permit Submitted: Y or (N) N/A __/__/__ Final Permit Issued: __/__/__

## ENFORCEMENT

Has the firm been referred to -- USEPA: Y or (N) __/__/__

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

## ORDERS ISSUED

CACO: __/__/__ CAFO: __/__/__ 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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| OWNER | | OPERATOR | |
|---|---|---|---|
| Name | Clark Oil & Refining | Name | SAME As Owner |
| Address | 8182 Maryland Avenue | Address | |
| City | St. Louis | City | |
| State | Missouri Zip 63105 | State | Zip |
| Phone # | 314/889-9600 | Phone # | |

| PERSON(S) INTERVIEWED | TITLE | PHONE # |
|---|---|---|
| Richard Thomas | Environmental Engineer | 618/254-7301 |
| | | |
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| INSPECTION PARTICIPANT(S) | AGENCY/TITLE | PHONE # |
|---|---|---|
| Jeff Schoenbacher | IEPA/EPS | 618/346-5120 |
| Michael D. Grant | IEPA/EPS | 618/346-5120 |
| Marianne Whitney | IEPA/LSCT | 618/346-5120 |
| | | |

| PREPARED BY | AGENCY/TITLE | PHONE # |
|---|---|---|
| Michael D. Grant | IEPA/EPS | 618/346-5120 |

# SUMMARY OF APPARENT VIOLATIONS

| Area | Class | Section |
|---|---|---|
| OTH | I | 722.111 |
| OTH | I | 722.134a)1 |
| | Spec | 725.292g) |
| | | 725.293f) |
| | | 725.294b) |
| | — | 722.134a)4 |
| | Spec | 725.116a) |
| OTH | I | 722.134c)1) |
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| | | 809.301 |
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Facility N[illegible]: Clark Oil & Refining

USEPA #: IL D041889023

IEPA #: 1190500002

# WASTE DISPOSITION FORM

On Annual Report for: (Circle if present; cross out if not present)

| 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 88 | * 19 89 | * 19 90 | Amount on Site | Rate of Generation | Last Manifested Shipment | Disposition |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| DAF Float | Wastewater Treatment | Listed | K048 | Yes | N/A | G/A ~~F~~ | G/A ~~F~~ | G/A ~~F~~ | 2,260 T118 | 116 Barrels per Day Also Included Oil w/ Sludge | N/A | Re-used to produce Petroleum Coke. 721.106(a)3)I |
| Slop Oil Emulsion Solids | Same as Above | Listed | K049 | Yes | N/A | G/A ~~F~~ | G/A ~~F~~ | G/A ~~F~~ | Included w/ Above | Included w/ Above | 6/5/89 1989 (Tank Closure) | Same as Above Cum, Emulle. |
| API Separator Sludge | Same as Above | Listed | K051 | Yes | N/A | G/A ~~F~~ | G/A ~~F~~ | G/A ~~F~~ | Included w/ Above | Included w/ Above | N/A | Same as Above |
| #1 Spent FCC Catalyst | Spent Catalyst from Cat Cracker | 8/31/90 | N/A | N/A | N/A | G ~~F~~ | G ~~F~~ | G ~~F~~ | | During Change-out Monthly (~40,000 lbs) | 11/24/92 | Sent off-site for reclamation to Petroleum Catalyst (TX) Clean-up waste Sent to Laidlaw |
| Oily Wastewater Treatment Sludge | Wastewater Treatment Sludge | 11/10/90 | N/A | N/A | N/A | G ~~F~~ | G ~~F~~ | G ~~F~~ | 7,000 gallons | ~60 Barrels a day | 3/12/91 | Peoria Disposal Co. Also Re-used in Coking Operation |
| API Separator Bottom Sludge | Sludge Removed from Bottom of API during Turnaround | Listed | K051 | Yes | N/A | G ~~F~~ | G ~~F~~ | G/A ~~F~~ | "0" | During Turnaround of API | 3/5/91 | LWD Calvert City |
| Leaded Tank Bottoms | Sludge Removed from Tanks (Leaded) | Listed | K052 | Yes | N/A | G F | G F | G F | "0" | Varies | 4/30/90 | Peoria Disposal Company |
| Part Washer Solvent | Safety-Kleen Parts Washers | Provided by S-K | D001 | Yes | N/A | G/A ~~F~~ | G/A ~~F~~ | G ~~F~~ | "0" Generated by S-K | Every 2 weeks | 3/8/91 | Safety-Kleen |
| Chromate Cont. Waste | Clean-up (Soil, Rock) around Chromate unit | 12/19/90 | D007 | Yes | N/A | G/A F | G F | G F | "0" | Varies upon Clean-up | 8/7/90 | Peoria Disposal Company |
| Cooling Tower Sludge | Sludge Removed during | 11/8/90 3/5/91 | Non-Haz | N/A | N/A | G ~~F~~ | G ~~F~~ | G ~~F~~ | 50,000 gallons | Varies Turnaround | 3/20/91 | Clean Harbors Chicago |

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

Madison County - Clark Oil & Refining
1190500002
ILD041889023

## REMARKS

Clark Oil and Refining is a petroleum refinery located in Hartford, Illinois. The facility no longer produces leaded gasoline and all leaded gasoline has been removed from the facility. Per Mr. Thomas, during tank clean-outs, the sludge generated was tested for lead. If lead was detected, the waste was handled as K052. The last shipment of K052 was April 30, 1990. During our inspection, there was no K052 on-site. Other listed refinery wastes generated are DAF float - K048, Slop Oil Emulsion solids - K049, Heat Exchanger bundle cleaning sludge - K050, and API Separator Sludge - K051.

The K050 wastestream is only generated during turnaround on the heat exchangers. Turnaround refers to the process of shutting down a unit or process to provide necessary repairs and maintenance. This sludge is treated in the facility's on-site wastewater treatment plant. The K048, K049 and K051 wastestreams are reused to produce petroleum coke. These wastes are pumped to Tank 4 for temporary storage prior to being taken to the Coker units. This waste is hauled in a vacuum truck and taken to Tank T1-18. T1-18 is a tank located at the Coker which is used to feed the injection tank on the unit. This waste is introduced in the initial quenching phase of the Coke producing operation. Pursuant to 721.106(a)(3)I, petroleum coke produced from oily hazardous waste is not regulated as long as the resulting coke produced does not exceed one or more of the characteristics of hazardous waste. The facility has not obtained an analysis of the coke product (722.111).

Pursuant to 721.106(c)(1), the recycling process itself is also exempt. However, Tanks 4 and T1-18 are not part of the recycling process, but are used to accumulate this waste prior to use in the coking operation. As a result, Tanks 4 and T1-18 are classified as storage tanks. Because the facility generated the waste and does not store the waste for greater than 90 days, a RCRA permit is not required pursuant to 722.134(a).

Not all K051 generated is reused in the manner described above. During turnaround, the heavier K051 sludge, which settles to the bottom of the separator, is removed and packaged for shipment off-site. This last shipment of this heavier sludge was shipped on March 5, 1991.

Both Tanks 4 and T1-18 have secondary containment provided. However, not all piping associated with Tank 4 is above ground and it was not demonstrated whether full secondary containment had been provided (722.134(a)(1), specifically 725.293(f)). Also, upon observation of Tank 4, an open 55-gallon drum with a collection of oily liquid was observed below the hose/piping outside the containment area. This drum constitutes a satellite accumulation drum and should be closed and labelled with the words "hazardous waste" (722.134(c)(1). This container was apparently collecting drippage from the ancillary equipment on Tank 4. Tank 4 should be equipped with spill prevention equipment like dry disconnect couplings (722.134(a)(1), specifically 725.294(b)).

RECEIVED
10 APR 1991
IEPA/DLPC

Tank T1-18 was constructed in 1989-1990 and as a result, is considered a new tank system. An inspection of this tank system was to be conducted by an independent professional engineer. This inspection is to be documented and maintained on file (722.134(a)(1), specifically 725.293(g)). This documentation was not available during the inspection.

The facility's paperwork was also reviewed and the following deficiencies were observed. The facility's training program has not been revised since 1985. As a result, the program does not include all the procedures for Tanks 4 and T1-18 as required. Also it does not include procedures for transferring the waste from Tank 4 to Tank T1-18 via vacuum truck (722.134(a)(4), specifically 725.116(a)(3)).

During the inspection, two areas were being excavated. An old process area in the southwest portion of the facility and a ditch at the northeast corner of the facility. The excavation generated contaminated soil which was being stockpiled. A permit for the Laidlaw landfill was issued to dispose of this waste as non-hazardous on January 2, 1991. The facility also generates lime from two pits, which receive lime slurry from the boilers. This waste, when removed from the pits, is sold as a product. Since this waste is considered a solid waste/special waste, a solid waste determination request should be submitted to the Agency's Permit Section. As a result, an apparent violation of 809.301 will be alleged for not shipping the waste lime as a special waste.

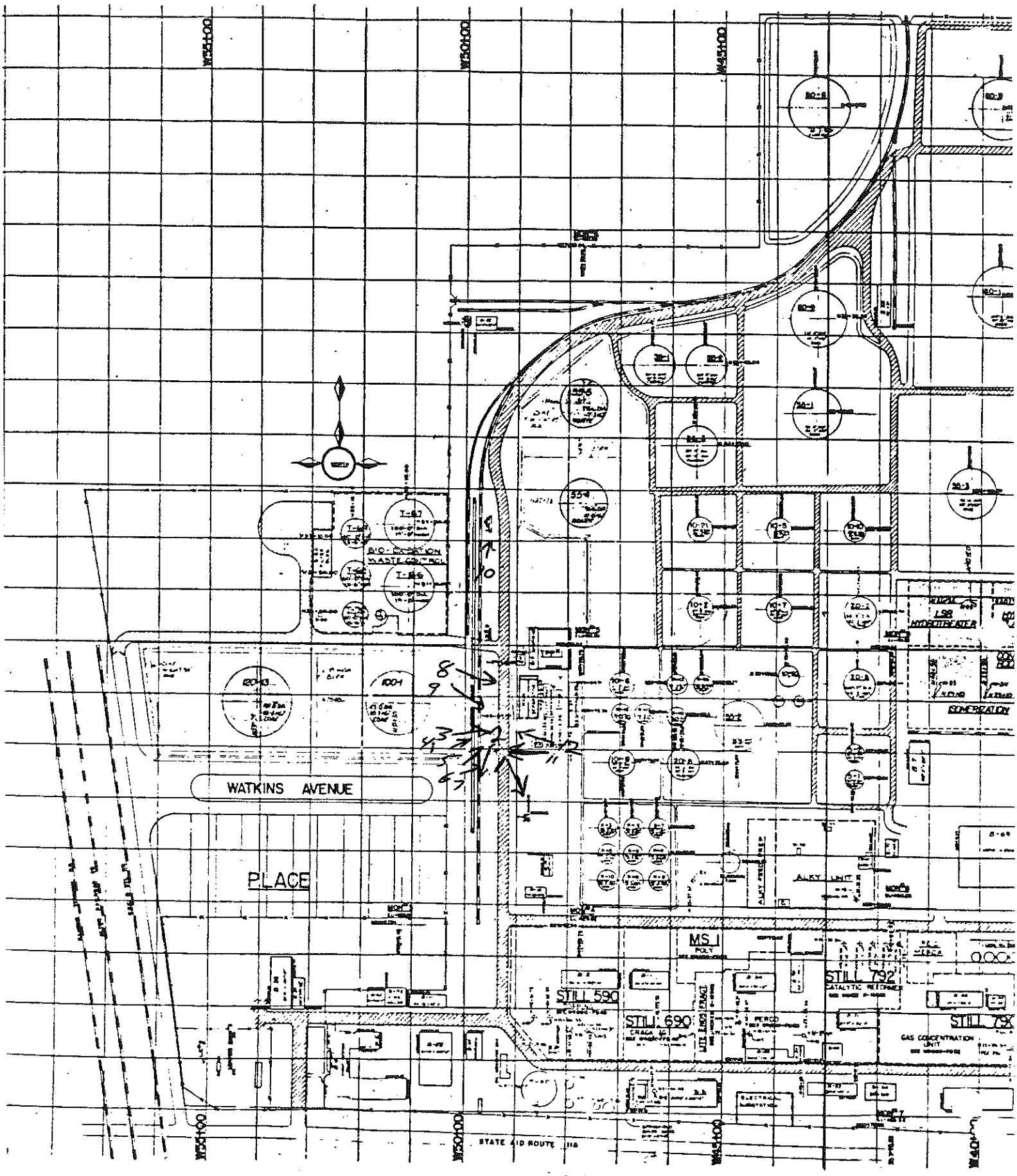
The facility also has a drum accumulation pad. No drums were in accumulation during this inspection. However, an inground sump is located on the southwest corner of the pad. This sump contained a collection of liquid. No analysis of this waste was available (722.111). If this waste is determined to be hazardous, then it will be considered a tank. Per Mr. Thomas, the sump is pumped whenever it becomes full.

During this inspection we informed Mr. Thomas that we would return the following day to sample the liquid in the drum pad sump, the two piles of soil and the lime pit.

In summary, the following apparent violations were discovered:

722.111
722.134(a)(1), specifically 725.292(g), 725.293(f), 725.294(b)
722.134(a)(4), specifically 725.116(a)(3)
722.134(c)(1)
809.301

MDG:cas/0636L

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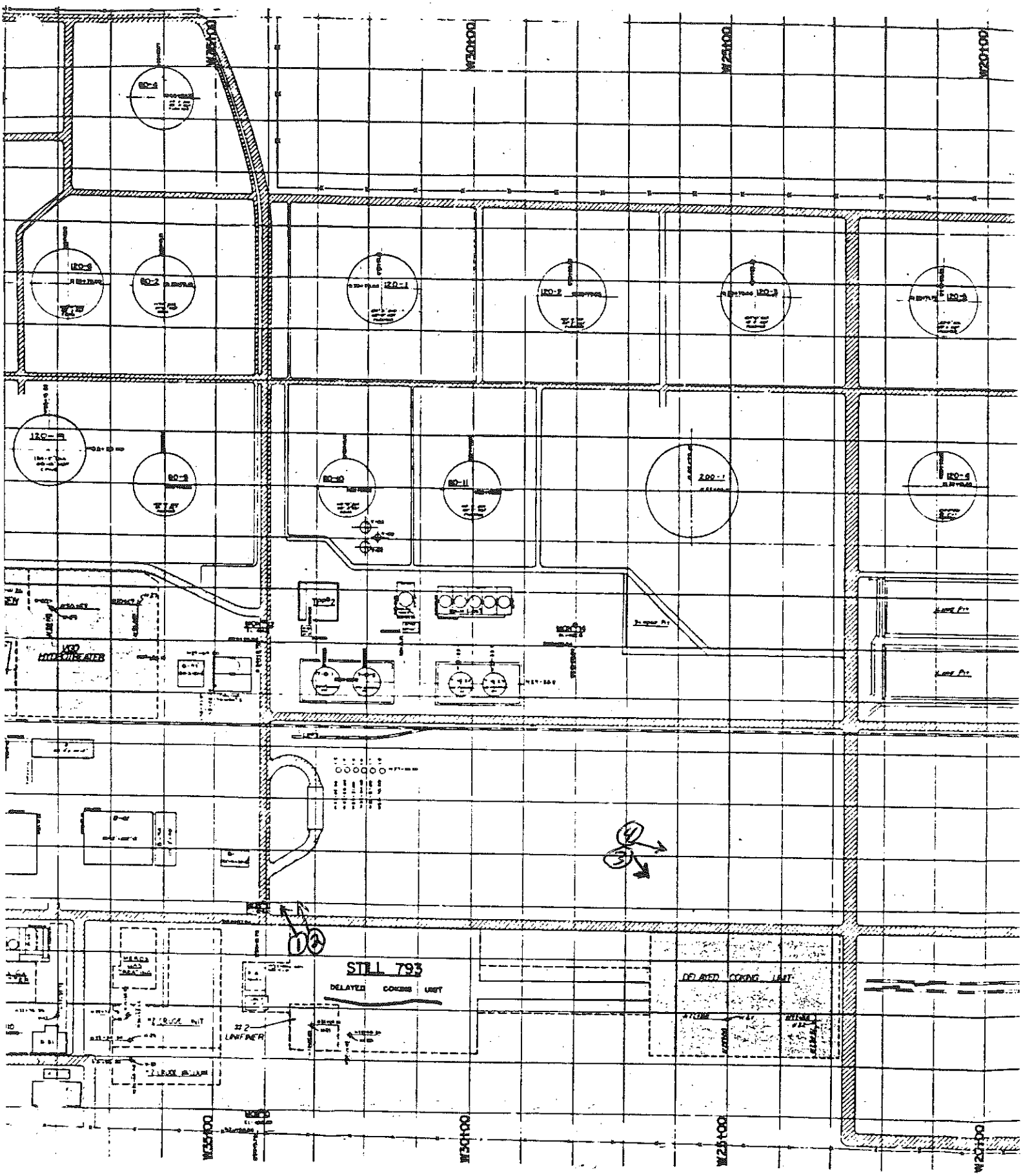


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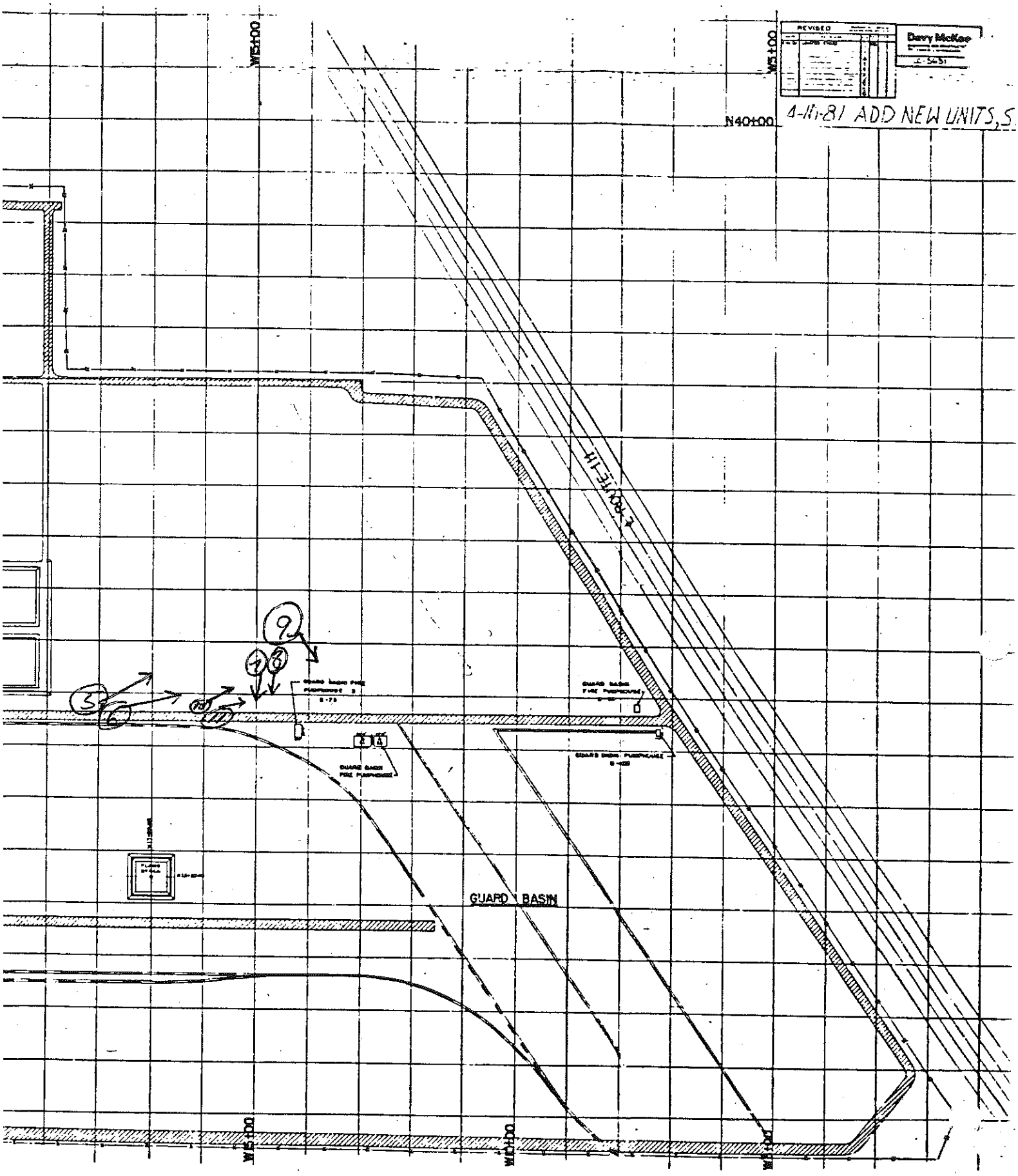


Photos Roll 15170 →

P 461 599 390

**RECEIPT FOR CERTIFIED MAIL**

NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL
*(See Reverse)*

| | |
|---|---|
| Sent to Clark Oil & Refining Corp | |
| Street and No. Hawthorne Street | |
| P.O., State and ZIP Code Hatrord, Illinois 62048 | |
| Postage | $ .25 |
| Certified Fee | .85 |
| Special Delivery Fee | |
| Restricted Delivery Fee | |
| Return Receipt showing to whom and Date Delivered | .90 |
| Return Receipt showing to whom, Date, and Address of Delivery | |
| TOTAL Postage and Fees | $ 2.00 |
| Postmark or Date | |

PS Form 3800, June 1985 ★U.S.G.P.O. 1989-234-555

5HR-13

**SENDER:** Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.
Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1. [X] Show to whom delivered, date, and addressee's address. *(Extra charge)*
2. [ ] Restricted Delivery *(Extra charge)*

3. Article Addressed to:
Clark Oil & Refining Corp.
Hawthorne Street
Hartford, Illinois 62048

4. Article Number
P 461 599 390

Type of Service:
[ ] Registered [ ] Insured
[X] Certified [ ] COD
[ ] Express Mail [ ] Return Receipt for Merchandise

Always obtain signature of addressee or agent and DATE DELIVERED.

5. Signature — Addressee
X

6. Signature — Agent
X Ivan Parrott

7. Date of Delivery
11-9-90

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

PS Form 3811, Apr. 1989 ★U.S.G.P.O. 1989-238-815 DOMESTIC RETURN RECEIPT

NOV 0 6 1990

5HR-13

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Clark Oil & Refining Corp.
Hawthorne Street
Hartford, Illinois 62048

Re: Clark Oil & Refining Corp.
ILD 041 889 023

Dear Sir or Madam:

The purpose of this letter is to inform you of the November 7, 1990, date of the expiration of the national capacity variance for petroleum refinery wastes, K048-K052. As you are aware under the Third Third rule, EPA granted an additional three-month national capacity variance for these wastes (55 FR 22641, June 1, 1990). The variance expires on November 7, 1990.

As of November 8, 1990, you, as the generator of these wastes, must treat the K048-K052 wastes to BDAT standards prior to land disposal, unless one of these three situations exists:

1. You have received final approval for a case-by-case extension (RCRA Section 3004(h)(3) and 40 CFR 268.5) as published in the Federal Register, or

2. You have received final approval for a "no-migration" variance (40 CFR 268.6) as published in the Federal Register, or

3. You or the treatment facility has received a treatability variance (40 CFR 268.44) for the particular waste stream(s).

The Agency anticipates that it will not issue any final decisions on any petitions for variances or extensions prior to November 8, 1990. During the period of the national capacity variance, you should have been exploring and implementing alternatives to the land disposal of untreated K048-K052 wastes.

The Agency is committed to carrying out the mandate established by Congress in RCRA Section 3004 of the Hazardous and Solid Waste Amendments of 1984. We will be conducting inspections and taking subsequent enforcement actions appropriate to the nature of the violations relating to the Land Disposal

Restrictions regulations soon after the November 8, 1990, date. We strongly advise you to take any necessary steps to be in compliance with these important requirements on the effective date.

Sincerely yours,

ORIGINAL SIGNED BY/
KARL BREMER

William E. Muno
Acting Associate Director
Office of RCRA

cc: E. William Radlinski
Glenn Savage
Illinois Environmental Protection Agency

| SIGNATURE/INITIAL CONCURRENCE REQUESTED - RCRA ENFORCEMENT BRANCH (REB) | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|
| TYP. | AUTH | IL/IN TES CHIEF | MI/WI TES CHIEF | MN/OH TES CHIEF | IL/MI/WI EPS CHIEF | IN/MN/OH EPS CHIEF | REB BRANCH CHIEF | RCRA ASSOC. DIR. | WMD DIVISION DIRECTOR |
| 11/5/90 | | | | | | SKCS 11-6-90 | 11-6-90 | 11/6/90 | |

INSPECTION REPORT

USEPA Number: ILD041889023 IEPA Number: 1119050002

Facility Name: Clark Oil and Refining

Street: Hawthorne Street P.O. Box 7
City: Hartford Telephone: 618/254-7301
County: Madison State: Ill. Zip Code: 62048

Type of Facility: Notified As: Gen. 1 Regulated As: Gen. 1
LDF? yes __ no X HPV? yes __ no X 90 Day Follow-up Required? yes __ no X

Region: 6 Date of Inspection: 9/14/89 (6/15/89) From: 9:50 (1:30) to 10:50 (2:15)
Weather (LDF Only): _____

Type of Inspection
ISS: ___ Sampling: __ Citizen Complaint: __ Closed: __ Withdrawal: __
Record Review: __ Follow-up to Inspection of 2/2/89: X Other: __

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

Notification date, _____, from initial __ or subsequent __ notification.

Part A date, _____, from initial __ or amended __ Part A.

Part B permit application submitted? yes __ no __

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

Federal Court Order Issued: _____ State Court Order Issued: _____

USEPA Compliance Order Issued: _____ Illinois PCB Order Issued: _____

SD 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 8_ 8_ 8_ |
|---|---|---|---|---|---|---|---|
| | | | | | | | |
| | | | | | | | |
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| | | | | | | | |
| | | | | | | | |

RECEIVED
SEP 21 1989
IEPA-DLPC

Operator: SAME AS LOCATION Telephone #:

Street:

City: State: Zip Code:

Owner: SAME AS LOCATION Telephone #:

Street:

City: State: Zip Code:

| Person Interviewed | Title | Telephone # |
|---|---|---|
| Richard Thomas | Env. Engineer | 618/254-7301 |
| | | |
| | | |
| | | |
| | | |
| | | |

| Inspection Participants | Agency/Title | Telephone # |
|---|---|---|
| Mike Grant | SEPA/EPS | 618/346-5120 |
| | | |
| | | |
| | | |
| | | |
| | | |

| Prepared By | Agency/Title | Telephone # |
|---|---|---|
| Michael D. Grant | SEPA/EPS | 618/346-5120 |

Summary of Apparent Violations

| Area | Class | Section | Area | Class | Section | Area | Class | Section |
|---|---|---|---|---|---|---|---|---|
| | | | | | | | | |
| | | | | | | | | |
| | | | | | | | | |
| | | | | | | | | |
| | | | | | | | | |
| | | | | | | | | |

1191~~1~~50002
Madison County
Clark Oil & Refining
ILD041889023

## REMARKS

Follow-up inspections were conducted at the subject facility on June 15, 1989 and September 14, 1989. The purpose of the June 15, 1989 inspection was to observe the closure activities occurring on Tank 10-2. The purpose of the September 14, 1989 inspection was to ensure all the closure activities had been completed. It was determined by Clark that closure of Tank 10-2 was required in order for them to comply with the apparent violations of Section 722.134(a)(1) identified during the February 2, 1989 ISS inspection. Specifically, apparent violations of Section 725.293(a)(4) - Secondary containment for Tank 10-2 had not been provided by January 12, 1989 and Section 725.296 - Visual contamination was observed within the earthen berm of Tank 10-2. It was determined by Clark to remove and close Tank 10-2 and install a recovery system at the Coking Unit.

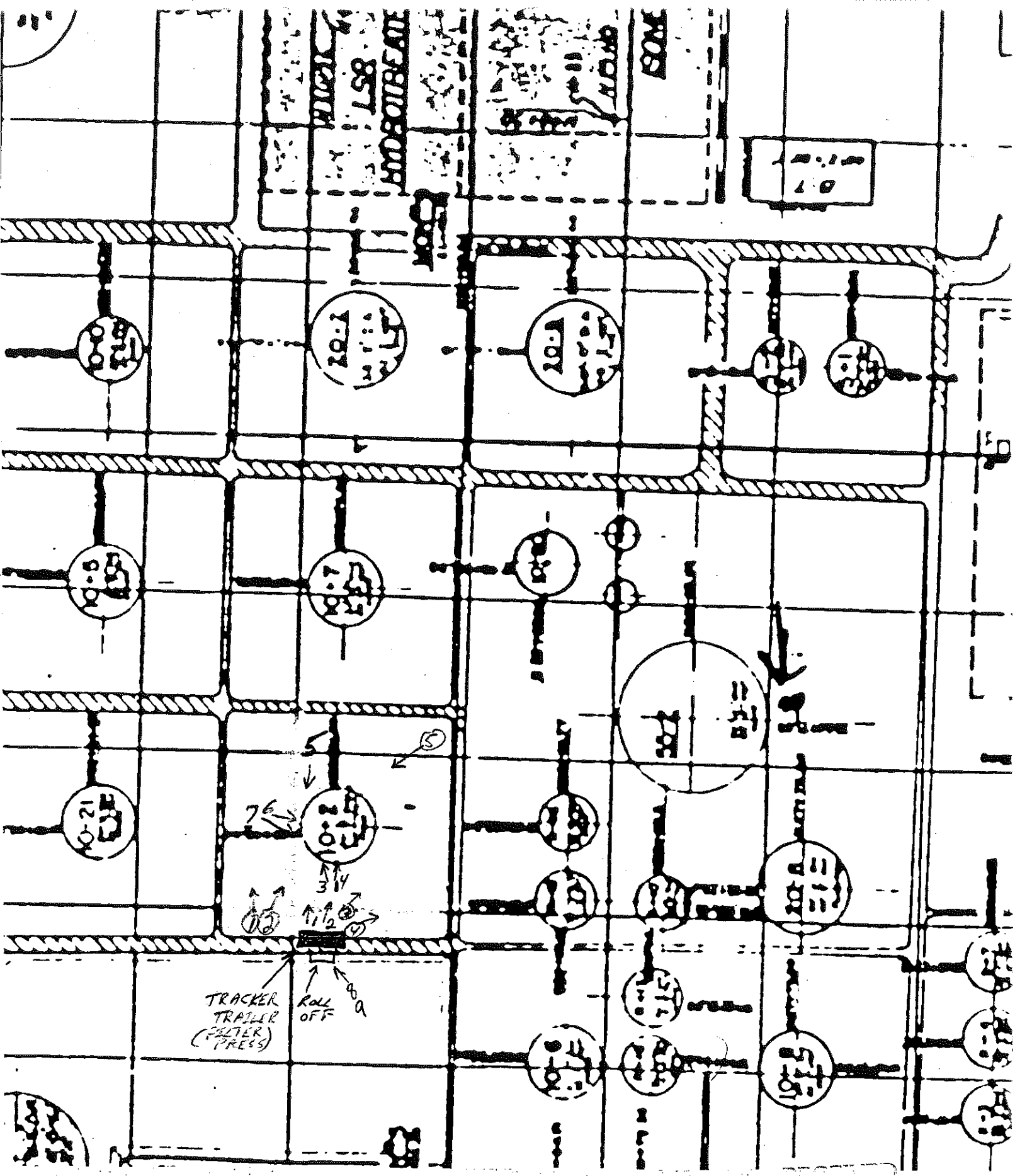
During the June 15, 1989 inspection, Tracker, subcontractor for Chemical Waste Management (CWM), was operating a filter press adjacent to Tank 10-2. The tank had been removed down to several feet above the waste level. Approximately 300 tons of waste/contaminated soil had been excavated within the tank farm and was shipped to CWM's landfill in Emelle, Alabama. Also, the foundation for the recovery system at the Coker Unit had been poured. Tracker started fixating the waste on June 12, 1989. A progress report received from Clark on July 20, 1989 (attached) indicated that it was decided by CWM that this operation was not being effective and Tracker was removed from the job. The remaining sludge was solidified by CWM and shipped to the Emelle facility. A total of 297 tons was shipped from the tank clean-out and 409 tons of waste/soil from within the earthen berm. The remaining soil within the berm was then treated with microbes. Two applications of microbes were used.

During the September 14, 1989 inspection, the former tank storage area was observed. Also observed was the new recycling system. The new system has yet to be completed. All API oil was being accumulated in Tank 4, which is part of the facility's NPDES permitted wastewater treatment plant. One load of API sludge was shipped to Heritage Environmental Service on May 19, 1989 and the oil has been trucked for use in the Coking Unit.

As a result of these follow-up inspections, the apparent violations of Section 722.134(a)(1) are considered resolved.

MDG:cas/0404L
Attachment

RECEIVED
SEP 21 1989
IEPA-DLPC




119050002

PLots CLARK OIL + REFINING

ROLL 1088 (4/05/89)

ROLL 1140 (9/14/89)

N

**CLARK OIL & REFINING CORPORATION**

Wood River Refinery
P.O. Box 7
Hartford, Illinois 62048
(618) 254-7301

July 18, 1989

RECEIVED
IEPA
JUL 20 1989
COLLINSVILLE OFFICE

Mr. Mike Grant
Illinois Environmental Protection Agency
2009 Mall Street
Collinsville, IL 62234

Dear Mr. Grant:

In response to our recent telephone conversation, the following is an outline of dates and progress in the cleanup and removal of tank 10-2. Not included in this outline are the numerous attempts by Clark Oil in March thru June 1989 to obtain a commitment from Chemical Waste Management (CWM) and to demand action from CWM.

6/2/89: CWM begins setting up equipment, making connections to water and electric, and ordering additional equipment.

6/5/89: CWM begins by attempting to cut the roof off the tank. Unable to do this, they remove the sides of the tank leaving several feet of headboard above the waste. The roof is in this way removed in small pieces.

6/9 - 6/12/89: Tracker begins setting up equipment and ordering replacements for the equipment broken. CWM finishes removing sides of tank.

6/14/89: Tracker starts processing the residual tank bottoms.

6/23/89: After nine days of work, Tracker has never processed more than two cycles per day and is beginning to process less than one cycle per day. CWM decides to remove Tracker from the job.

6/27/89: Tracker has removed most of their equipment, and CWM begins solidifying and removing tank bottoms.

6/30/89: CWM finishes cleaning tank.

7/3 - 7/6/89: CWM cuts up and removes bottom of tank. The area around the tank is again cleaned, and contaminants are removed.

7/10/89: Initial treatment of soil with microbes begins.

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SEP 21 1989

7/18/89: Second treatment of soil, this time with microbes followed by fertilizer within a few days.

8/89: Second dosage of fertilizer is applied to area.

9/89: Treatment of tank farm area completed.

If you have any questions about this schedule or any part of the cleanup, please call me at (618) 254-7301.

Sincerely,

Richard Thomas

Richard Thomas

2 0 APR 1989

5HR-12

Mr. Joe Bean
Clark Oil Refining Corporation
Hawthorne Street
P.O. Box 7
Hartford, Illinois 62048

Re: Return to Compliance
Clark Oil Refining Corp.
ILD 041 889 023

Dear Mr.Bean:

We have received and reviewed your letter of April 4, 1989, regarding our Notice of Violation (NOV) dated March 3, 1989.

The information submitted with your letter appears to meet the requirements of the land disposal restriction regulation found at 40 CFR 268. We have, therefore, returned this facility to compliance for that violation cited in our NOV.

If you should have any further questions, please contact Ms. Sharon Travis of my staff at (312) 886-6533.

Sincerely yours,

OR 4/19/89

| RCRA ENFORCEMENT | REB STAFF | REB SECTION CHIEF | REB CHIEF |
|---|---|---|---|
| INIT. DATE | st 4-19-89 | PSA 4.20-89 | |

Paul E. Dimock, Chief
IL/MI/WI Enforcement Program Section

cc: Harry Chappel, IEPA-CMS
Glen Savage, IEPA-FOS
Mike Grant, IEPA
Richard Thomas, Clark Oil & Refining Corporation

5HR-12:S. TRAVIS:or:3-7925:04/18/89:DISK#1:PC FILENAME:Bean

2 0 APR 1989

5HR-12

Mr. Joe Bean
Clark Oil Refining Corporation
Hawthorne Street
P.O. Box 7
Hartford, Illinois 62048

Re: Return to Compliance
Clark Oil Refining Corp.

Dear Mr.Bean:

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If you should have any further questions, please contact Ms. Sharon Travis of my staff at (312) 886-6533.

Sincerely yours,

Paul E. Dimock, Chief
IL/MI/WI Enforcement Program Section

cc: Harry Chappel, IEPA-CMS
Glen Savage, IEPA-FOS
Mike Grant, IEPA
Richard Thomas, Clark Oil & Refining Corporation

5HR-12:S. TRAVIS:or:3-7925:04/18/89:DISK#1:PC FILENAME:Bean

CLARK OIL & REFINING CORPORATION
LAND DISPOSAL RESTRICTION NOTIFICATION & CERTIFICATION FORM

RECEIVED
APR 7 1989
OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION V

Date: _____

Clark Oil & Refining Corporation

EPA ID#: ILDO 41889023

Manifest No.: _____

Waste Stream - EPA No.: _____

This form is submitted in accordance with 40 CFR Part 268, which restricts the land disposal of certain hazardous wastes. The restricted waste streams generated by refineries are: K048, K049, K050, K051, K052. The initial restrictions for first-third wastes became effective on August 8, 1988. The above listed refinery waste has a land ban variance until August 8, 1990. Included in this notification is a copy of the applicable treatment standards. Any waste analysis data available will also be included.

_____

Signature Title Date

(A copy of this form must be kept for five years.)

Att.

Waste F, K : Petroleum Refining Industry: Dissolved Air Flotation Float (K048); Slop Oil Emulsion Solids (K049); Heat Exchanger Bundle Cleaning Sludge (K050); API Separator Sludge (K051); and Leaded Tank Bottoms (K052)

| Waste No. | BDAT | Constituents | Nonwastewaters Total Composition (mg/kg) | Nonwastewaters TCLP (mg/l) | Wastewaters Total Composition (mg/l) | Wastewaters TCLP |
|---|---|---|---|---|---|---|
| K048 | Nonwastewaters: Organic Constituents - solvent extraction and/or incineration Metal Constituents - stabilization process | Benzene | 9.5 | | 0.011 | |
| | | Benzo(a)pyrene | 0.84 | | 0.047 | |
| | | Bis(2-ethylhexyl)phthalate | 37 | | 0.043 | |
| | | Chrysene | 2.2 | | 0.043 | |
| | | Di-n-butyl Phthalate | 4.2 | | 0.060 | |
| | | Ethylbenzene | 67 | | 0.011 | |
| | | Fluorene | | | 0.050 | |
| | Wastewaters: Organic Constituents - incineration | Naphthalene | Reserved | | 0.033 | |
| | | Phenanthrene | 7.7 | | 0.039 | |
| | | Phenol | 2.7 | | 0.047 | |
| | Metal Constituents - chromius reduction, lime and sulfide precipitation, and vacuum filtration | Pyrene | 2.0 | | 0.045 | |
| | | Toluene | 9.5 | | 0.011 | |
| | | Xylenes | Reserved | | 0.011 | |
| | | Cyanides (total) | 1.8 | | | |
| | | Arsenic | | 0.004 | | |
| | | Chromius (total) | | 1.7 | 0.20 | |
| | | Nickel | | 0.048 | | |
| | | Selenium | | 0.025 | | |
| | | Lead | | | 0.037 | |
| K049 | | Anthracene | 6.2 | | 0.039 | |
| | | Benzene | 9.5 | | 0.011 | |
| | | Benzo(a)pyrene | 0.84 | | 0.047 | |
| | | Bis(2-ethylhexyl)phthalate | 37 | | 0.043 | |
| | | Carbon Disulfide | | | 0.011 | |
| | | Chrysene | 2.2 | | 0.043 | |
| | | 2,4-Dimethylphenol | | | 0.033 | |
| | | Ethylbenzene | 67 | | 0.011 | |
| | | Naphthalene | Reserved | | 0.033 | |
| | | Phenanthrene | 7.7 | | 0.039 | |
| | | Phenol | 2.7 | | 0.047 | |
| | | Pyrene | 2.0 | | 0.045 | |
| | | Toluene | 9.5 | | 0.011 | |
| | | Xylenes | Reserved | | 0.011 | |
| | | Cyanides (total) | 1.8 | | | |
| | | Arsenic | | 0.004 | | |
| | | Chromium (total) | | 1.7 | 0.020 | |
| | | Nickel | | 0.048 | | |
| | | Selenium | | 0.025 | | |
| | | Lead | | | 0.037 | |
| K050 | | Benzo(a)pyrene | 0.084 | | 0.047 | |
| | | Phenol | 2.7 | | 0.047 | |
| | | Cyanides (total) | 1.8 | | | |
| | | Arsenic | | 0.004 | | |
| | | Chromium (total) | | 1.7 | 0.20 | |
| | | Nickel | | 0.048 | | |
| | | Selenium | | 0.025 | | |
| | | Lead | | | 0.037 | |
| K051 | | Acenaphthene | | | 0.050 | |
| | | Anthracene | 6.2 | | 0.039 | |
| | | Benzene | 9.5 | | 0.011 | |
| | | Benzo(a)anthracene | 1.4 | | 0.043 | |
| | | Benzo(a)pyrene | 0.84 | | 0.047 | |
| | | Bis(2-ethylhexyl)phthalate | 37 | | 0.043 | |
| | | Chrysene | 2.2 | | 0.043 | |
| | | Di-n-butyl Phthalate | 4.2 | | 0.060 | |
| | | Ethylbenzene | 67 | | 0.011 | |
| | | Fluorene | | | 0.050 | |
| | | Naphthalene | Reserved | | 0.033 | |
| | | Phenanthrene | 7.7 | | 0.039 | |
| | | Phenol | 2.7 | | 0.047 | |
| | | Pyrene | 2.0 | | 0.045 | |
| | | Toluene | 9.5 | | 0.011 | |
| | | Xylenes | Reserved | | 0.011 | |
| | | Cyanides (total) | 1.8 | | | |
| | | Arsenic | | 0.004 | | |
| | | Chromium (total) | | 1.7 | 0.20 | |
| | | Nickel | | 0.048 | | |
| | | Selenium | | 0.025 | | |
| | | Lead | | | 0.037 | |
| K052 | | Benzene | 9.5 | | 0.011 | |
| | | Benzo(a)pyrene | 0.84 | | 0.047 | |
| | | o-Cresol | 2.2 | | 0.011 | |
| | | p-Cresol | 0.90 | | 0.011 | |
| | | 2,4-Dimethylphenol | | | 0.033 | |
| | | Ethylbenzene | 67 | | 0.011 | |
| | | Naphthalene | Reserved | | 0.033 | |
| | | Phenanthrene | 7.7 | | 0.039 | |
| | | Phenol | 2.7 | | 0.047 | |
| | | Toluene | 9.5 | | 0.011 | |
| | | Xylenes | Reserved | | 0.011 | |
| | | Cyanides (total) | 1.8 | | | |
| | | Arsenic | | 0.004 | | |
| | | Chromium (total) | | 1.7 | 0.20 | |
| | | Nickel | | 0.048 | | |
| | | Selenium | | 0.025 | | |
| | | Lead | | | 0.037 | |

**CLARK OIL & REFINING CORPORATION**

Wood River Refinery
P.O. Box 7
Hartford, Illinois 62048
(618) 254-7301

April 4, 1989

RECEIVED
APR 7 1989
OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION V

Mr. Dimock
United States Environmental Protection Agency
Region 5
230 South Dearborn Street
Chicago, IL 60604

Reply #5HR-12

Dear Mr. Dimock:

On March 7, 1989, we received from your agency a request to include a land disposal restriction notification with each shipment of first-third waste. Notification has been sent to the appropriate facility for shipments made after August 8, 1988. Included in this letter you will please find a copy of the notification form that will accompany all future shipments of first-third wastes. Please contact the undersigned if our procedures fail to meet your requirements. If you have any questions, please contact me at (618) 254-7301.

Sincerely,

Richard Thomas

Richard Thomas

Encl.

Ms. Sharon Travis SHR-12
P 0 862 565

**RECEIPT FOR CERTIFIED MAIL**
NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL
*(See Reverse)*

★U.S.G.P.O. 1985-480-794

| | |
|---|---|
| Sent to Mr. Joe Bean | |
| Street and No. Hawthorne Street | |
| P.O., State and ZIP Code P.O. Box 7 Hartford, Illinois 62048 | |
| Postage | $1.85 |
| Certified Fee | .85 |
| Special Delivery Fee | |
| Restricted Delivery Fee | |
| Return Receipt showing to whom and Date Delivered | 90 |
| Return Receipt showing to whom, Date, and Address of Delivery | |
| TOTAL Postage and Fees | $3.60 |
| Postmark or Date | |

PS Form 3800, June 1985

CHICAGO, IL LOOP S.A. USPO MAR 31 1989

**SENDER:** Complete items 1 and 2 when additional services are desired, and comp[illegible] items 3 and 4.
Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1. ☒ Show to whom delivered, date, and addressee's address. ↑*(Extra charge)*↑
2. ☐ Restricted Delivery ↑*(Extra charge)*↑

3. Article Addressed to:
Mr. Joe Bean
Clark Oil + Refining Corp.
Hawthorne Street
P.O. Box 7
Hartford, Illinois 62048

4. Article Number
P250 862 565

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

Always obtain signature of addressee or agent and DATE DELIVERED.

5. Signature — Addressee
X Ivan Parrott

6. Signature — Agent
X

7. Date of Delivery 3-7-89

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

PS Form **3811**, Mar. 1987 ★ U.S.G.P.O. 1987-178-268 **DOMESTIC RETURN RECEIPT**

0 3 MAR 1989

5HR-12

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Joe Bean
Clark Oil & Refining Corporation
Hawthorne Street
P.O. Box 7
Hartford, Illinois 62048

Re: Notice of Violation
Clark Oil & Refining Corporation
ILD 041 889 023

Dear Mr. Bean:

On February 2, 1989, the Illinois Environmental Protection Agency (IEPA), representing the U.S. Environmental Protection Agency (U.S. EPA), conducted a Resource Conservation and Recovery Act (RCRA) inspection of the above-referenced facility. The purpose of the inspection was to determine the facility's compliance with the applicable hazardous waste management requirements of RCRA, including the Federal land disposal restrictions. The land disposal restrictions for F001-F005 waste solvents became effective on November 8, 1986, (40 CFR Part 268, and revisions to 40 CFR Parts 260-265 and 270-271) and for "California List" hazardous wastes on July 8, 1987, (reference 52 Federal Register 25760: revisions to 40 CFR Parts 262, 264, 268, and 270-271). Additionally, the land disposal restrictions for First Third of Scheduled Wastes became effective on August 8, 1988, (53 Federal Register 31138: revisions to 40 CFR Parts 264, 265, 266, 268, and 271).

With respect to the land disposal restrictions section of the inspection, your facility was found to be in violation of the following:

> The facility is subject to a case-by-case extension under Section 268.5, an exemption under Section 268.6, a nation-wide variance. Facility failed to submit with each shipment of First Third waste, to the off-site facility, a notification stating that the waste is not prohibited from land disposal. The notification must contain the following information: EPA hazardous waste number; applicable treatment standard, manifest number; waste analysis data where available; and the date the waste is subject to the prohibitions, as required by Section 268.7(a)(3).

A copy of the inspection report is enclosed for your records. Please submit to this office, within thirty (30) days of receipt of this Notice of Violation, and indicating what measures have been initiated to assure future

compliance. Failure to correct the violation may subject the facility to further Federal enforcement action.

If you have any questions regarding this correspondence, please contact Ms. Sharon R. Travis of my staff at (312) 886-6533.

Sincerely yours,

Paul E. Dimock, Chief
IL/MI/WI Enforcement Program Section

Enclosure

cc: Harry Chappel, IEPA-CMS
Glen Savage, IEPA-FOS
Mike Grant, IEPA

bcc: Compliance File
Sharon Travis

5HR-12:S. TRAVIS:or:03/01/89:3-7925:DISK# 1:PC FILENAME:joebean

OR 3/1/89

| RCRA ENFORCEMENT | REB STAFF | REB SECTION CHIEF | REB CHIEF |
|---|---|---|---|
| INIT. DATE | 3-2-89 | FRN Acting 3-2-89 | |

FOS

OCT TRADU

# RCRA LAND DISPOSAL RESTRICTION INSPECTION

**Facility:** Clark Oil + Refining Corp.

**U.S. EPA I.D. No.:** ILD 041889023 (IL# 1190500002)

**Street:** Hawthorne St P.O. Box 7

**City:** Hartford **State:** IL **Zip Code:** 62048

**Telephone:** 618/254-7301

**Operator:** Same as above

**Street:**

**City:** **State:** **Zip Code:**

**Telephone:**

**Owner:** Clark Oil + Refining Corp.

**Street:** 8182 Maryland Ave

**City:** St. Louis **State:** Mo. **Zip Code:** 63105

**Telephone:** 314/ 889-9600

**Inspection Date:** 2/2/89 **Time:** 10:00 - 11:45am **Weather Conditions:** 35° Rainy

| | Name | Affiliation | Telephone |
|---|---|---|---|
| Inspectors: | Mike Grant | IEPA | 618/346-5120 |
| | Wendy Schaufelberger | IEPA | " |
| Facility Representatives: | Joe Bean | | 618/254-7301 |
| | Richard Thomas, Environmental Eng. | | " |

| | RCRA Status | F-Solvent | LDR Status California List | First Third |
|---|---|---|---|---|
| Generator | X | | | X |
| Transporter | | | | |
| Treater | | | | |
| Storer | | | | |
| Disposer | | | | |

RECEIVED
FEB 14 1989
IEPA-DLPC



Revised 9-26-88

IL 532-1739
LPC 296 11/88

# INSPECTION SUMMARY

# RCRA LAND DISPOSAL RESTRICTION INSPECTION

## APPLICABILITY CHECKLIST

Does the facility handle the following wastes?

| | | Gen. | Treat | Store | Disp. | Trans. |
|---|---|---|---|---|---|---|
| **A.** | **F-Solvent Wastes** | | | | | |
| 1. | F001 | ____ | ____ | ____ | ____ | ____ |
| 2. | F002 | ____ | ____ | ____ | ____ | ____ |
| 3. | F003 | ____ | ____ | ____ | ____ | ____ |
| 4. | F004 | ____ | ____ | ____ | ____ | ____ |
| 5. | F005 | ____ | ____ | ____ | ____ | ____ |

Note: Use Appendix A to determine whether the facility is misclassifying any of its wastes.

**B. California List Wastes**

1. Liquid hazardous waste (including free liquids associated with any solid or sludge) that contains the following metals at concentrations greater than or equal to those specified

| | | Gen. | Treat | Store | Disp. | Trans. |
|---|---|---|---|---|---|---|
| Arsenic | 500 mg/L | ____ | ____ | ____ | ____ | ____ |
| Cadmium | 100 mg/L | ____ | ____ | ____ | ____ | ____ |
| Chromium VI | 500 mg/L | ____ | ____ | ____ | ____ | ____ |
| Lead | 500 mg/L | ____ | ____ | ____ | ____ | ____ |
| Mercury | 20 mg/L | ____ | ____ | ____ | ____ | ____ |
| Nickel | 134 mg/L | ____ | ____ | ____ | ____ | ____ |
| Selenium | 100 mg/L | ____ | ____ | ____ | ____ | ____ |
| Thallium | 130 mg/L | ____ | ____ | ____ | ____ | ____ |

2. Liquid hazardous waste (including free liquids associated with any solid or sludge) that contains free cyanides at concentrations greater than or equal to 1,000 mg/L

| Gen. | Treat | Store | Disp. | Trans. |
|---|---|---|---|---|
| ____ | ____ | ____ | ____ | ____ |

3. Liquid hazardous waste that has a pH of less than or equal to 2.0

| | | | | |
|---|---|---|---|---|
| ____ | ____ | ____ | ____ | ____ |

4. Liquid hazardous waste that contains PCBs at concentrations greater than or equal to

| | | | | | |
|---|---|---|---|---|---|
| 50 ppm | ____ | ____ | ____ | ____ | ____ |
| 500 ppm | ____ | ____ | ____ | ____ | ____ |

Does the facility mix liquid hazardous waste that contains PCBs with other types of wastes?

____ Yes ____ No ____ NA

If yes, state reasons for mixing:

_____

_____

5. Hazardous waste that contains HOCs greater than or equal to 1,000 mg/L (liquids) or 1,000 mg/kg (solids)

| | | | | |
|---|---|---|---|---|
| ____ | ____ | ____ | ____ | ____ |

Note (1): The prohibitions of 268.32(a)(3) and (e) do not apply if the waste is also subject to the solvent restrictions of 268 Subpart C for a specific HOC.

Note (2): The effective date of regulation for liquid wastes with HOCs greater than or equal to 1,000 mg/L and less than 10,000 mg/L was July 8, 1987; the effective date for liquid wastes containing HOCs greater than or equal to 10,000 mg/L and solid wastes containing HOCs greater than 1,000 mg/kg is November 8, 1988.

C. <u>First Third Wastes</u>

Note: (1) The detailed description for waste codes are listed in Appendix C.
(2) EPA has promulgated the treatment standards for the following waste code with *.

| | Gen. | Treat | Store | Disp. | Trans. |
|---|---|---|---|---|---|
| F006* | ____ | ____ | ____ | ____ | ____ |
| F007 | ____ | ____ | ____ | ____ | ____ |
| F008 | ____ | ____ | ____ | ____ | ____ |
| F009 | ____ | ____ | ____ | ____ | ____ |
| F019 | ____ | ____ | ____ | ____ | ____ |
| K001* | ____ | ____ | ____ | ____ | ____ |
| K004* | ____ | ____ | ____ | ____ | ____ |
| K008* | ____ | ____ | ____ | ____ | ____ |
| K011 | ____ | ____ | ____ | ____ | ____ |
| K013 | ____ | ____ | ____ | ____ | ____ |
| K014 | ____ | ____ | ____ | ____ | ____ |
| K015* | ____ | ____ | ____ | ____ | ____ |
| K016* | ____ | ____ | ____ | ____ | ____ |
| K017 | ____ | ____ | ____ | ____ | ____ |
| K018* | ____ | ____ | ____ | ____ | ____ |
| K019* | ____ | ____ | ____ | ____ | ____ |
| K020* | ____ | ____ | ____ | ____ | ____ |
| K021* | ____ | ____ | ____ | ____ | ____ |
| K022* | ____ | ____ | ____ | ____ | ____ |
| K024* | ____ | ____ | ____ | ____ | ____ |
| K025* | ____ | ____ | ____ | ____ | ____ |
| K030* | ____ | ____ | ____ | ____ | ____ |
| K031 | ____ | ____ | ____ | ____ | ____ |
| K035 | ____ | ____ | ____ | ____ | ____ |
| K036* | ____ | ____ | ____ | ____ | ____ |
| K037* | ____ | ____ | ____ | ____ | ____ |
| K044* | ____ | ____ | ____ | ____ | ____ |
| K045* | ____ | ____ | ____ | ____ | ____ |
| K046* | ____ | ____ | ____ | ____ | ____ |

| | Gen. | Treat | Store | Disp. | APP Trans. |
|---|---|---|---|---|---|
| K047* | | | | | |
| K048* | X | | | | |
| K049* | X | | | | |
| K050* | X | | | | |
| K051* | X | | | | |
| K052* | potential | | | | |
| K060* | | | | | |
| K061* | | | | | |
| K062* | | | | | |
| K069* | | | | | |
| K071* | | | | | |
| K073* | | | | | |
| K083* | | | | | |
| K084 | | | | | |
| K085 | | | | | |
| K086* | | | | | |
| K087* | | | | | |
| K099* | | | | | |
| K100* | | | | | |
| K101* | | | | | |
| K102* | | | | | |
| K103* | | | | | |
| K104* | | | | | |
| K106* | | | | | |
| P001 | | | | | |
| P004 | | | | | |
| P005 | | | | | |
| P010 | | | | | |
| P011 | | | | | |
| P012 | | | | | |
| P015 | | | | | |
| P016 | | | | | |
| P018 | | | | | |

| | Gen. | Treat | Store | Disp. | APP Trans. |
|---|---|---|---|---|---|
| P020 | ____ | ____ | ____ | ____ | ____ |
| P030 | ____ | ____ | ____ | ____ | ____ |
| P036 | ____ | ____ | ____ | ____ | ____ |
| P037 | ____ | ____ | ____ | ____ | ____ |
| P039 | ____ | ____ | ____ | ____ | ____ |
| P041 | ____ | ____ | ____ | ____ | ____ |
| P048 | ____ | ____ | ____ | ____ | ____ |
| P050 | ____ | ____ | ____ | ____ | ____ |
| P058 | ____ | ____ | ____ | ____ | ____ |
| P059 | ____ | ____ | ____ | ____ | ____ |
| P063 | ____ | ____ | ____ | ____ | ____ |
| P068 | ____ | ____ | ____ | ____ | ____ |
| P069 | ____ | ____ | ____ | ____ | ____ |
| P070 | ____ | ____ | ____ | ____ | ____ |
| P071 | ____ | ____ | ____ | ____ | ____ |
| P081 | ____ | ____ | ____ | ____ | ____ |
| P082 | ____ | ____ | ____ | ____ | ____ |
| P084 | ____ | ____ | ____ | ____ | ____ |
| P087 | ____ | ____ | ____ | ____ | ____ |
| P089 | ____ | ____ | ____ | ____ | ____ |
| P092 | ____ | ____ | ____ | ____ | ____ |
| P094 | ____ | ____ | ____ | ____ | ____ |
| P097 | ____ | ____ | ____ | ____ | ____ |
| P102 | ____ | ____ | ____ | ____ | ____ |
| P105 | ____ | ____ | ____ | ____ | ____ |
| P108 | ____ | ____ | ____ | ____ | ____ |
| P110 | ____ | ____ | ____ | ____ | ____ |
| P115 | ____ | ____ | ____ | ____ | ____ |
| P120 | ____ | ____ | ____ | ____ | ____ |
| P122 | ____ | ____ | ____ | ____ | ____ |
| P123 | ____ | ____ | ____ | ____ | ____ |
| U007 | ____ | ____ | ____ | ____ | ____ |
| U009 | ____ | ____ | ____ | ____ | ____ |

| | Gen. | Treat | Store | Disp. | APP Trans. |
|---|---|---|---|---|---|
| U010 | ____ | ____ | ____ | ____ | ____ |
| U012 | ____ | ____ | ____ | ____ | ____ |
| U016 | ____ | ____ | ____ | ____ | ____ |
| U018 | ____ | ____ | ____ | ____ | ____ |
| U019 | ____ | ____ | ____ | ____ | ____ |
| U022 | ____ | ____ | ____ | ____ | ____ |
| U029 | ____ | ____ | ____ | ____ | ____ |
| U031 | ____ | ____ | ____ | ____ | ____ |
| U036 | ____ | ____ | ____ | ____ | ____ |
| U037 | ____ | ____ | ____ | ____ | ____ |
| U041 | ____ | ____ | ____ | ____ | ____ |
| U043 | ____ | ____ | ____ | ____ | ____ |
| U044 | ____ | ____ | ____ | ____ | ____ |
| U046 | ____ | ____ | ____ | ____ | ____ |
| U050 | ____ | ____ | ____ | ____ | ____ |
| U051 | ____ | ____ | ____ | ____ | ____ |
| U053 | ____ | ____ | ____ | ____ | ____ |
| U061 | ____ | ____ | ____ | ____ | ____ |
| U063 | ____ | ____ | ____ | ____ | ____ |
| U064 | ____ | ____ | ____ | ____ | ____ |
| U066 | ____ | ____ | ____ | ____ | ____ |
| U067 | ____ | ____ | ____ | ____ | ____ |
| U074 | ____ | ____ | ____ | ____ | ____ |
| U077 | ____ | ____ | ____ | ____ | ____ |
| U078 | ____ | ____ | ____ | ____ | ____ |
| U086 | ____ | ____ | ____ | ____ | ____ |
| U089 | ____ | ____ | ____ | ____ | ____ |
| U103 | ____ | ____ | ____ | ____ | ____ |
| U105 | ____ | ____ | ____ | ____ | ____ |
| U108 | ____ | ____ | ____ | ____ | ____ |
| U115 | ____ | ____ | ____ | ____ | ____ |
| U122 | ____ | ____ | ____ | ____ | ____ |
| U124 | ____ | ____ | ____ | ____ | ____ |

| | Gen. | Treat | Store | Disp. | APP Trans. |
|---|---|---|---|---|---|
| U129 | ____ | ____ | ____ | ____ | ____ |
| U130 | ____ | ____ | ____ | ____ | ____ |
| U133 | ____ | ____ | ____ | ____ | ____ |
| U134 | ____ | ____ | ____ | ____ | ____ |
| U137 | ____ | ____ | ____ | ____ | ____ |
| U151 | ____ | ____ | ____ | ____ | ____ |
| U154 | ____ | ____ | ____ | ____ | ____ |
| U155 | ____ | ____ | ____ | ____ | ____ |
| U157 | ____ | ____ | ____ | ____ | ____ |
| U158 | ____ | ____ | ____ | ____ | ____ |
| U159 | ____ | ____ | ____ | ____ | ____ |
| U171 | ____ | ____ | ____ | ____ | ____ |
| U177 | ____ | ____ | ____ | ____ | ____ |
| U180 | ____ | ____ | ____ | ____ | ____ |
| U185 | ____ | ____ | ____ | ____ | ____ |
| U188 | ____ | ____ | ____ | ____ | ____ |
| U192 | ____ | ____ | ____ | ____ | ____ |
| U200 | ____ | ____ | ____ | ____ | ____ |
| U209 | ____ | ____ | ____ | ____ | ____ |
| U210 | ____ | ____ | ____ | ____ | ____ |
| U211 | ____ | ____ | ____ | ____ | ____ |
| U219 | ____ | ____ | ____ | ____ | ____ |
| U220 | ____ | ____ | ____ | ____ | ____ |
| U221 | ____ | ____ | ____ | ____ | ____ |
| U223 | ____ | ____ | ____ | ____ | ____ |
| U226 | ____ | ____ | ____ | ____ | ____ |
| U227 | ____ | ____ | ____ | ____ | ____ |
| U228 | ____ | ____ | ____ | ____ | ____ |
| U237 | ____ | ____ | ____ | ____ | ____ |
| U238 | ____ | ____ | ____ | ____ | ____ |
| U248 | ____ | ____ | ____ | ____ | ____ |
| U249 | ____ | ____ | ____ | ____ | ____ |

# RCRA LAND DISPOSAL RESTRICTION INSPECTION

## GENERATOR CHECKLIST

## GENERATOR REQUIREMENTS

A. **BDAT 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% TOC by weight)
   ___ Pharmaceutical wastewater containing spent methylene chloride
   ___ All other spent solvent wastes

2. California List Wastes: Does the generator correctly determine the appropriate treatment standard of the waste?

   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 or disposed of by other approved alternate methods (40 CFR 761. 60 (e))?

      _____ Yes _____ No _____ NA

      If yes, specify the method and state whether the facility has submitted a written request to the Regional Administrator or Assistant Administrator for an exemption from the incineration requirement:

      _____
      _____
      _____

3. First Third Wastes: Does the generator correctly determine the appropriate treatability group of the waste?

_X_ Yes ____ No ____ NA

If yes, check the appropriate treatability group.

____ Wastewater (less than 1% TOC by weight and less than 1% filterable solids)
_X_ Nonwastewaters

List the waste code and check the correct treatment standard group.

| Waste Code | Wastewater | Nonwastewater |
|---|---|---|
| K051 (3 year disposal variance) | | X |
| K048 | | X |
| K049 | | X |
| K052 | | X |

These three are recycled through the Coking process and do not go off site but become raw product

B. **Waste Analysis**

1. F-Solvent Wastes

a. Does the generator determine whether the F-solvent waste exceeds treatment standards?

____ Yes ____ No ____ NA

How was this determination made?

- Knowledge of waste

____ Yes ____No

If yes, is any supporting data available for review? Describe how this is adequate._____

- TCLP

____ Yes ____ No

If yes, provide the date of last test, the frequency of testing, and note any problems. Attach test results.

b. Does the F-solvent waste exceed applicable treatability group treatment standards upon generation [268.7(a)(2)]?

_____ Yes _____ No _____ NA

If yes, specify the waste stream: _____

c. Does the generator dilute the F-solvent waste as a substitute for adequate treatment [268.3]?

_____ Yes _____ No _____ NA

d. How does the generator test F-solvent waste when a process or waste stream changes?

_____

_____

_____

2. California List Wastes

a. Does the generator determine whether the waste is a liquid according to the Paint Filter Liquids Test (PFLT method 9095) as described by SW-846?

_____ Yes _____ No _____ NA

b. If the waste is determined to be a liquid according to PFLT, is an absorbent added to the waste?

_____ Yes _____ No _____ NA

What type of absorbent is used? _____

Check the types of waste to which absorbent is added.

____ Liquid hazardous waste having a pH less than or equal to 2

____ Liquid hazardous waste containing metals

____ Liquid hazardous waste containing free cyanides

c. Does the generator determine whether the concentration levels (not extract or filtrate) in the waste equal or exceed the prohibition levels or whether the waste has a pH of less than or equal to 2.0 based on:

- Knowledge of wastes

_____ Yes _____ No _____ NA

If yes, is any supporting data available for review? Describe how this is adequate._____

- Testing

____ Yes ____ No ____ NA

If yes, list test method used: _____

d. Does the generator determine if concentration levels in the PFLT filtrate exceed cyanide and metals concentration levels?

____ Yes ____ No ____ NA

- If yes, list test method used and constituent and concentration levels that exceeded prohibition levels: _____

e. Does the generator dilute the waste as a substitute for adequate treatment [268.3]?

____ Yes ____ No ____ NA

3. First Third Wastes:

a. Does the generator correctly determine the appropriate treatment standard of the waste?

X Yes ____ No ____ NA

Note: The treatment standards for first third wastes are given in Appendix D.

b. Does the generator determine whether the First Third waste exceeds treatment standards upon generation?

X Yes ____ No ____ Soft hammer

If yes, specify the waste stream: K051 API separator Sludge

How was this determination made?

- Knowledge of waste

X Yes ____ No

If yes, is any supporting data available for review? Describe how this is adequate. API sludge is not treated on-site.

- TCLP

____ Yes ____ No ____ NA

- Total Constituent Analysis

____ Yes ____ No ____ NA

Provide the date of last test, the frequency of testing, and note any problems. Attach test results.

_____

_____

c. Does the generator dilute the waste as a substitute for adequate treatment [268.3]?

____ Yes ___X___ No ____ NA

d. How does the generator test the waste when a process or waste stream changes?

N/A

_____

_____

## C. Management

1. On-Site Management

Is restrict waste or waste that exceeds the treatment standards treated, stored, or disposed on-site?

___X___ Yes ____ No

However stored less than 90 days.

If yes, the TSD Checklist must be completed.

2. Off-Site Management

a. Does the generator ship any waste that exceeds the treatment standards to an off-site treatment or storage facility?

___X___ Yes ____ No

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

____ Yes ___X___ No

c. Does notification contain the following?

| | | |
|---|---|---|
| EPA Hazardous waste number(s) | ____ Yes | ____ No |
| Applicable treatment standards | ____ Yes | ____ No |
| Manifest number | ____ Yes | ____ No |
| Waste analysis data, if available | ____ Yes | ____ No |

Identify off-site treatment or storage facilities: _____

d. Does the generator ship any waste that meets the treatment standards to an off-site disposal facility?

____ Yes  X No

e. Does the generator provide notification and certification to the disposal facility [268.7(a)(2)]?

____ Yes  ____ No

f. Does notification contain the following?

| | | |
|---|---|---|
| EPA Hazardous waste number(s) | ____ Yes | ____ No |
| Applicable treatment standards | ____ Yes | ____ No |
| Manifest number | ____ Yes | ____ No |
| Waste analysis data, if available | ____ Yes | ____ No |
| Certification that the waste meets treatment standards | ____ Yes | ____ No |

Identify off-site land disposal facilities: _____

g. Is the waste subject to a nationwide variance, case by case extension (268.5), or petition (268.6)?

X Yes  ____ No  ____ NA

h. 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  X No

i. If yes, 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 |

j. Does the generator retain copies of all notices and certifications for a period of 5 years?

____ Yes X No

D. **Demonstration and Certification -- "Soft Hammer" Wastes**

a. 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

b. Has the generator submitted to the Regional Adminstration a demonstration and certification containing the following information to document its efforts to locate practically available treatment:

| | | |
|---|---|---|
| A list of facilities and facility officials contacted? | ____ Yes | ____ No |
| Addresses | ____ Yes | ____ No |
| Telephone Numbers | ____ Yes | ____ No |
| Contact dates | ____ Yes | ____ No |

Attach a copy of the demonstration and certification

c. If the generator has determined that there is no practically available treatment for its wastes, has it sent documentation to EPA demonstrating why it was not able to obtain treatment or recovery for the waste?

____ Yes ____ No

If yes, attach a copy of written discussion.

d. Does the generator ship his waste off-site for treatment?

_____ Yes _____ No

Describe the type of treatment and treatment facilities _____

_____

_____

e. Did the generator send a copy of its demonstration and certification to the receiving facility with the first shipment of waste?

_____ Yes _____ No

f. Does the generator provide certification with each subsequent shipment of wastes?

_____ Yes _____ No

g. Does the generator provide the following notification to the receiving facility with each shipment of waste?

| | | | |
|---|---|---|---|
| (i) | EPA Hazardous waste number | _____ Yes | _____ No |
| (ii) | Manifest number | _____ Yes | _____ No |
| (iii) | Waste analysis data, if available | _____ Yes | _____ No |

h. Does the generator retain copies of all notices, demonstrations, and certifications for a period of 5 years?

_____ Yes _____ No

E. <u>Treatment Using RCRA 264/265 Exempt Units or Processes</u>
(i.e., boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.)

Are treatment residuals generated from units or processes exempt under RCRA 264/265?

_____ Yes _____No

If yes, list types of waste treatment units and processes:

_____

_____

# RCRA LAND DISPOSAL RESTRICTION INSPECTION

## TRANSPORTER CHECKLIST

### TRANSPORTER REQUIREMENTS

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

C. Is the waste treated in an exempt treatment process on-site?

_____ Yes _____ No

# RCRA LAND DISPOSAL RESTRICTION INSPECTION

## TSD CHECKLIST

### TSD REQUIREMENTS

A. <u>General Facility Standards</u>

1. Does the waste analysis plan cover Part 268 requirements [264.13 or 265.13]?

   o F-solvent ____ Yes ____ No ____ NA

   o California List ____ Yes ____ No ____ NA

   o First Third ____ Yes ____ No ____ NA

2. Does the facility obtain representative chemical and physical analyses of wastes and residues?

   ____ Yes ____ No

   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. Is F-solvent waste analyzed using TCLP?

   ____ Yes ____ No ____ NA

   d. Is First Third waste analyzed using the analytical method that is appropriate for the objective of the specified BDAT (i.e., total constituent analysis for destruction technologies and TCLP for stabilization/fixation technologies)?

   ____ Yes ____ No ____ NA

   Note: The appropriate analytical methods (TCLP or total constituent) for first third wastes with specified treatment standards are given in Appendix D.

   e. Describe the frequency of sampling: _____

3. Are the operating records, including analyses and quantities, complete [264.73/265.73]?

_____ Yes _____ No

B. <u>Storage</u> (268.50)

1. Are restricted wastes stored on-site?

_____ Yes _____ No

If no, go to C, Treatment.

2. If yes, check the appropriate method.

_____ Tanks
_____ Containers

3. Are all containers clearly marked to identify the contents and date(s) entering storage?

_____ Yes _____ No _____ NA

_____
_____
_____

4. Do operating records track the location, quantity of the wastes, and dates that the wastes enter and leave storage?

_____ Yes _____ No

5. Do operating records agree with container labeling?

_____ Yes _____ No _____ NA

6. Do operating records contain copies of the notice, certification, and demonstration (if applicable) from the generator for the past 5 years?

_____ Yes _____ No

7. Have wastes been stored for more than 1 year since the applicable LDR regulations went into effect?

_____ Yes _____ No _____ NA

If yes, can the facility show that such accumulation is necessary to facilitate proper recovery, treatment, or disposal?

_____ Yes _____ No

If yes, state how: _____

_____

_____

8. 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 more than the tank volume?

_____ Yes _____ No

9. 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?

_____ Yes _____ No _____ NA

_____

_____

_____

C. <u>Treatment</u>

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

_____ Yes _____ No

If no, go to D, Treatment in Surface Impoundments.

2. Describe the treatment processes:

_____

_____

_____

3. Does the facility, in accordance with an acceptable waste analysis plan, determine whether the residue or residue extract (for treatment standards expressed as concentrations in the waste extract) from all treatment processes is less than treatment standards [268.7(b)]?

_____ Yes _____ No

4. Is dilution used as a substitute for treatment?

_____ Yes _____ No

6. Are notifications, demonstration, and certification (if applicable) prepared by the generators kept in the facility's operating record?

_____ Yes _____ No

7. Does the facility ship any waste or treatment residue that meets the treatment standards to an off-site disposal facility?

_____ Yes _____ No _____ NA

If yes, does the treatment facility provide notification and certification to the disposal facility?

_____ Yes _____ No

If yes, does notification contain the following?

| | | |
|---|---|---|
| EPA Hazardous waste number(s) | _____ Yes | _____ No |
| Applicable treatment standards | _____ Yes | _____ No |
| Manifest number | _____ Yes | _____ No |
| Waste analysis data, if available | _____ Yes | _____ No |
| Certification that the waste meets the treatment standards | _____ Yes | _____ No |

Identify off-site disposal facilities: _____

_____

_____

8. Does the facility ship any "soft hammer" waste to an off-site disposal facility?

_____ Yes _____ No _____ NA

If yes, does the treatment facility send a copy of the generator's demonstration (if applicable) and certification to the disposal facility?

_____ Yes _____ No

D. <u>Treatment in Surface Impoundments</u>

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

_____ Yes _____ No

If no, go to E, Land Disposal.

2. If yes, did the facility submit to the Agency the waste analysis plan and certification of compliance with minimum technology and ground-water monitoring requirements?

_____ Yes _____ No

3. If the minimum technology requirements have not been met, has a waiver been granted for that unit?

_____ Yes _____ No _____ NA

4. 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.

5. Do the hazardous waste residues (sludges or liquids) exceed the treatment standards specified in 268.41, or where no treatment standards are established for a waste, the applicable prohibition levels?

_____ Yes _____ No

6. Provide the frequency of analyses conducted on treatment residues: _____

_____

_____

7. Does the operating record adequately document the results of waste analyses performed in accordance with 268.41?

_____ Yes _____ No

8. Do the hazardous waste residues exceed the treatment standards (268.41) or do not meet the prohibition levels?

Sludge _____ Yes _____ No

Supernatant _____ Yes _____ No

a. If yes, are sludge and supernatant removed adequately on an annual basis?

_____ Yes _____ No

b. Are adequate precautions taken to protect liners, and do records indicate that liner integrity is inspected?

_____ Yes _____ No

c. Are residues subsequently managed in another surface impoundment?

_____ Yes _____ No

d. Are residues treated prior to disposal?

_____ Yes _____ No

If yes, are waste residues treated on-site or off-site?

_____ On-site _____ Off-site

Identify treatment method: _____

_____

_____

E. **Land Disposal**

1. Are restricted wastes placed in land disposal units such as landfills, surface impoundments, waste piles, wells, land treatment units, salt domes/beds, mines/caves, or concrete vault or bunker?

   _____ Yes _____ No

   Note: Do not include surface impoundments addressed in D, Treatment in Surface Impoundments.

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

   _____

2. Are these wastes disposed of in a new, replacement, or laterally expanded landfill or impoundment that meets the minimum technology requirements (double liner and leachate collection) and groundwater monitoring?

   _____ Yes _____ No

3. Does the facility operating record have notices, certifications, and demonstration (if applicable) from generators/storer/treaters for 5 years [268.7(c); 268.7(a),(b)]?

   _____ Yes _____ No

4. 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? _____

   _____

5. If restricted wastes that exceed the treatment standards are placed in land disposal units (excluding national capacity variances) [268.30(a)], does facility have an approved waiver based on no migration petition [268.6], an approved case-by-case capacity extension [268.5], or variance [268.44]?

   _____ Yes _____ No

6. Does the facility dispose of restricted wastes that are subject to a national capacity variance?

   _____ Yes _____ No

7. Does the facility have notices [268.7(a)(3)] and records of disposal for disposed wastes that are subject to a national capacity variance, case-by-case extensions [268.5], or no migration petitions [268.6]?

____ Yes ____ No ____ NA

8. What is the volume of the restricted wastes disposed of to date?

_____

_____

9. If the facility has a case-by-case extension, is the facility making progress as described in progress reports?

____ Yes ____ No ____ NA

## APPENDIX A

## SOLVENT IDENTIFICATION CHECKLIST

1. Does the handler generate any of the following F001 constituents (i.e., spent halogenated solvents used in degreasing) as a result of being used in the process either in pure form or commercial grade?

| | | |
|---|---|---|
| tetrachloroethylene | ____Yes | ____No |
| trichloroethylene | ____Yes | ____No |
| methylene chloride | ____Yes | ____No |
| 1,1,1-trichloroethane | ____Yes | ____No |
| carbon tetrachloride | ____Yes | ____No |
| chlorinated fluorocarbons | ____Yes | ____No |

2. Does the handler generate any of the following F002 constituents (i.e., spent halogenated solvents) as a result of being used in the process either in pure form or commercial grade?

| | | |
|---|---|---|
| tetrachloroethylene | ____Yes | ____No |
| trichloroethylene | ____Yes | ____No |
| methylene chloride | ____Yes | ____No |
| 1,1,1-trichloroethane | ____Yes | ____No |
| chlorobenzene | ____Yes | ____No |
| trichlorofluoromethane | ____Yes | ____No |
| 1,1,2-trichloro-1,2,2-trifluoroethane | ____Yes | ____No |
| ortho-dichlorobenzene | ____Yes | ____No |

3. Does the handler generate any of the following F003 constituents (i.e., spent nonhalogenated solvents) as a result of being used in the process either in pure form or commercial grade?

| | | |
|---|---|---|
| xylene | ____Yes | ____No |
| acetone | ____Yes | ____No |
| ethyl acetate | ____Yes | ____No |
| ethyl benzene | ____Yes | ____No |
| ethyl ether | ____Yes | ____No |
| methyl isobutyl ketone | ____Yes | ____No |
| n-butyl alcohol | ____Yes | ____No |
| cyclohexanone | ____Yes | ____No |
| methanol | ____Yes | ____No |

If the F003 waste stream has been mixed with a solid waste, does the resultant mixture exhibit the ignitability characteristic? ____Yes ____No

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4. Does the handler generate any of the following F004 constituents (i.e., spent nonhalogenated solvents) as a result of being used in the process either in pure form or commercial grade?

| | | |
|---|---|---|
| cresols and cresylic acid | ____Yes | ____No |
| nitrobenzene | ____Yes | ____No |

5. Does the handler generate any of the following F005 constituents (i.e., spent nonhalogenated solvents) as a result of being used in the process either in pure form or commercial grade?

| | | |
|---|---|---|
| toluene | ____Yes | ____No |
| methyl ethyl ketone | ____Yes | ____No |
| carbon disulfide | ____Yes | ____No |
| isobutanol | ____Yes | ____No |
| pyridine | ____Yes | ____No |

6. Are any of the constituents listed in questions 1 through 5 used for their "solvent" properties -- that is to solubilize (dissolve) or mobilize other constituents? The following questions will be helpful in confirming this determination.

(a) Are the constituents used as chemical carriers?

____Yes ____No

If yes, list the constituents.

_____

_____

(b) Are the constituents used for degreasing/cleaning?

____Yes ____No

If yes, list the constituents.

_____

_____

(c) Are the constituents used as diluents?

____Yes ____No

If yes, list the constituents.

_____

_____

(d) Are the constituents used as extractants?

____Yes ____No

If yes, list the constituents.

_____

_____

(e) Are the constituents used for fabric scouring?
____Yes ____No

If yes, list the constituents.

_____

_____

(f) Are the constituents used as reaction and synthesis media?
____Yes ____No

If yes, list the constituents.

_____

_____

**If the responses to questions 1 through 6 led the inspector to believe that the waste may be an F-solvent, answer question 7.**

7. Are any of the above constituents spent solvents? (A solvent is considered "spent" when it has been used and is no longer usable without being regenerated, reclaimed, or otherwise reprocessed.) ____Yes ____No

8. If the waste is a mixture of constituents as determined in questions 1 through 6, give the concentration before use of <u>all</u> the constituents in the solvent mixture/blend. For example:

| | |
|---|---|
| 5% | methylene chloride |
| 2% | trichloroethylene |
| 25% | 1,1,1-trichloroethane |
| 68% | mineral spirits |
| 100% | |

If the waste stream is a mixture containing a total of 10% or more (by volume) of one or more of the F001, F002, F004, or F005 listed constituents before use, it is a listed waste.

With respect to the F003 solvent wastes, if, before use, the waste stream is mixed and contains <u>only</u> F003 constituents, it is a listed waste. For example:

| | |
|---|---|
| 33% | acetone |
| 16% | methanol |
| 51% | ethyl ether |
| 100% | |

If the waste stream is a mixture containing F003 constituents and a total of 10% or more of one or more of the F001, F002, F004, and F005 listed constituents before use, it is a listed waste. For example:

| | |
|---|---|
| 50% | xylene (F003) |
| 12% | TCE (F001) |
| 38% | mineral spirits |
| 100% | |

If in light of the above, the handler appears to be generating F001 - F005 hazardous wastes, refer this facility to the enforcement official for followup actions verifying the use of solvents at the facility.

## APPENDIX B
## TREATMENT STANDARDS FOR F-SOLVENTS

| F001-F005 SPENT SOLVENTS | CONCENTRATION (IN MG/L) WASTEWATERS | OTHER WASTES |
|---|---|---|
| Acetone | 0.05 | 0.59 |
| N-butyl | 5.0 | 5.0 |
| Carbon disulfide | 1.05 | 4.81 |
| Carbon tetrachloride | .05 | .96 |
| Chlorobenzene | .15 | .05 |
| Cresols (and cresylic acid) | 2.82 | .75 |
| Cycohexanone | .125 | .75 |
| 1,2-dichlorobenzene | .65 | .125 |
| Ethyl acetate | .05 | .75 |
| Ethyl benzene | .05 | .053 |
| Ethyl ether | .05 | .75 |
| Isobutanol | 5.0 | 5.0 |
| Methanol | .25 | .75 |
| Methylene chloride | .20 | .96 |
| Methylene chloride (from the pharmaceutical industry) | 0.44 | .96 |
| Methyl ethyl ketone | 0.05 | 0.75 |
| Methyl isobutyl ketone | 0.05 | .33 |
| Nitrobenzene | 0.66 | 0.125 |
| Pyridine | 1.12 | 0.33 |
| Tetrachloroethylene | 0.079 | 0.05 |
| Toluene | 1.12 | 0.33 |
| 1,1,1-Trichloroethane | 1.05 | 0.41 |
| 1,2,2-Trichlor 1,2,2-trifluoroethane | 1.05 | 0.96 |
| Trichloroethylene | 0.062 | 0.091 |
| Trichlorofluoromethane | 0.05 | 0.96 |
| Xylene | 0.05 | 0.15 |

# APPENDIX C

## DETAILED DESCRIPTION OF FIRST THIRD WASTE CODES

*§ 261.31 Wastes*

F006—Wastewater treatment sludges from electroplating operations except from the following processes: (1) Sulfuric acid anodizing of aluminum; (2) tin plating on carbon steel; (3) zinc plating (segregated basis) on carbon steel; (4) aluminum or zinc-aluminum plating on carbon steel; (5) cleaning/stripping associated with tin, zinc and aluminum plating on carbon steel; and (6) chemical etching and milling of aluminum.

F007—Spent cyanide plating bath solutions from electroplating operations.

F008—Plating bath sludges from the bottom of plating baths from electroplating operations where cyanides are used in the process.

F009—Spent stripping and cleaning bath solutions from electroplating operations where cyanides are used in the process.

F019—Wastewater treatment sludges from the chemical conversion coating of aluminum.

*§ 261.32 Wastes*

K001—Bottom sediment sludge from the treatment of wastewaters from wood preserving processes that use creosote and/or pentachlorophenol.

K004—Wastewater treatment sludge from the production of zinc yellow pigments.

K008—Over residue from the production of chrome oxide green pigments.

K011—Bottom stream from the wastewater stripper in the production of acrylonitrile.

K013—Bottom stream from the acetonitrile column in the production of acrylonitrile.

K014—Bottoms from the acetonitrile purification column in the production of acrylonitrile.

K015—Still bottoms from the distillation of benzyl chloride.

K016—Heavy ends or distillation residues from the production of carbon tetrachloride.

K017—Heavy ends (still bottoms) from the purification column in the production of epichlorohydrin.

K018—Heavy ends from the fractionation column in ethyl chloride production.

K019—Heavy ends from the distillation of ethylene dichloride in ethylene dichloride production.

K020—Heavy ends from the distillation of vinyl chloride in vinyl chloride monomer production.

K021—Aqueous spent antimony catalyst waste from fluoromethanes production.

K022—Distillation bottom tars from the production of phenol/acetone from cumane.

K024—Distillation bottoms from the production of phthalic anhydride from naphthalene.

K025—Distillation bottoms from the production of nitrobenzene by the nitration of benzene.

K030—Column bottom or heavy ends from the combined production of trichloroethylene and perchloroethylene.

K031—By-products salts generated in the production of MSMA and cacodylic acid.

K035—Wastewater treatment sludges generated in the production of creosote.

K036—Still bottoms from toluene reclamation distillation in the production of disulfoton.

K037—Wastewater treatment sludge from the production of disulfoton.

K044—Wastewater treatment sludges from the manufacturing and processing of explosives.

K045—Spent carbon from the treatment of wastewater containing explosives.

K046—Wastewater treatment sludges from the manufacturing, formulation and loading of lead-based initiating compounds.

K047—Pink/red water from TNT operations.

K048—Dissolved air flotation (DAF) float from the petroleum refining industry.

K049—Stop oil emulsion solids from the petroleum refining industry.

K050—Heat exchange bundle cleaning sludge from the petroleum refining industry.

K051—API separator sludge from the petroleum refining industry.

K052—Tank bottoms (leaded) from the petroleum refining industry.

K060—Ammonia still lime sludge from coking operations.

K061—Emission control dust/sludge from the primary production of steel in electric furnaces.

K062—Spent pickle liquor from steel finishing operations in chlorine production.

K069—Emission control dust/sludge from secondary lead smelting.

K071—Brine purification muds from the mercury cells process in chlorine production, where separately prepurified brine is not used.

K073—Chlorinated hydrocarbon waste from the purification step of the diaphragm cell process using graphite anodes

K083—Distillation bottoms from aniline production.

K084—Wastewater treatment sludges generated during the production of veterinary pharmaceuticals from arsenic or organoarsenic compounds.

K085—Distillation of fractionation column bottoms from the production of chlorobenzenes.

K086—Solvent washes and sludges; caustic washes and sludges, or water washes and sludges from cleaning tubs and equipment used in the formulation of ink from pigments, driers, soaps, and stabilizers containing chromium and lead.

K087—Decanter tank tar sludge from coking operations.

K099—Untreated wastewater from the production of 2,4-D.

K100—Waste leaching solution from acid leaching of emission control dust/sludge from secondary lead smelting.

K101—Distillation tar residues from the distillation of aniline-based compounds in the production of veterinary pharmaceuticals from arsenic or organo-arsenic compounds.

K102—Residue from the use of activated carbon for decolorization in the production of veterinary pharmaceuticals from arsenic or organo-arsenic compounds.

K103—Process residues from aniline extraction from the production of aniline.

K104—Combined wastewater streams generated from nitrobenzene/aniline production.

K106—Waste water treatment sludge from the mercury cell process in chlorine production.

*§ 261.33(e) Wastes*

P001—Warfarin, when present at concentration greater than 0.3%
P004—Aldrin
P005—Allyl alcohol
P010—Arsenic acid
P011—Arsenic (V) oxide
P012—Arsenic (III) oxide
P015—Beryllium dust
P016—Bis-(chloromethyl) ether
P018—Brucine
P020—Dinoseb
P030—Soluble cyanide salts not elsewhere specified
P036—Dichlorophenylarsine
P037—Dieldrin
P039—Disulfoton
P041—Diethyl-p-nitrophenyl phosphate
P048—2,4-Dinitrophenol
P050—Endosulfan
P058—Fluoracetic acid, sodium salt
P059—Heptachlor
P063—Hydrogen cyanide
P068—Methyl Hydrazine
P069—Methyllactonitrile
P070—Aldicarb
P071—Methyl parathion
P081—Nitroglycerine
P082—N-Nitrosodimethylamine
P084—N-Nitrosomethylvinylamine
P087—Osmium tetraoxide
P089—Parathion
P092—Phenylmercuric acetate
P094—Phorate
P097—Famphur
P102—Propargyl alcohol
P105—Sodium azide
P108—Strychnine and salts
P110—Tetraethyl lead
P115—Thallium (I) sulfate
P120—Vanadium pentoxide
P122—Zinc phosphide, when present at concentrations greater than 10%
P123—Toxaphene

*§ 261.33(f) Wastes*

U007—Acrylamide
U009—Acrylonitrile
U010—Mitomycin C
U012—Aniline
U016—Benz(c)acridine
U018—Benz(a)anthracene
U019—Benzene
U022—Benzo(a)pyrene
U029—Methyl bromide
U031—n-Butanol
U036—Chlordane, technical
U037—Chlorobenzene
U041—n-Chloro-2,3-epoxypropane
U043—Vinyl chloride
U044—Chloroform
U046—Chloromethyl methyl ether
U050—Chrysene
U051—Creosote
U053—Crotonaldehyde
U061—DDT
U063—Dibenz o (a, h) anthracene
U064—1,2:7,8 Dibenzopyrene
U066—Dibromo-3-chloropropane 1,2-
U067—Ethylene dibromide
U074—1,4-Dichloro-2-butene
U077—Ethane, 1,2-dichloro-
U078—Dichloroethylene, 1,1-
U086—N,N Diethylhydrazine
U089—Diethylstilbestrol
U103—Dimethyl sulfate
U105—2,4-Dinitrotoluene
U108—Dioxane, 1,4-
U115—Ethylene oxide
U122—Formaldehyde
U124—Furan
U129—Lindane
U130—Hexachlorocyclopentadiene
U133—Hydrazine
U134—Hydrofluoric acid
U137—Indeno(1,2,3-cd)pyrene
U151—Mecury
U154—Methanol
U155—Methapyrilene
U157—3-Methylcholanthrene
U158—4,4-Methylene-bis-(2-chloroaniline)
U159—Methyl ethyl ketone
U171—Nitropropane, 2-
U177—N-Nitroso-N-methylurea
U180—N-Nitrosopyrrolidine
U185—Pentachloronitrobenzene
U188—Phenol
U192—Pronamide
U200—Reserpine
U209—Tetrachloroethane, 1,1,2,2-
U210—Tetrachloroethylene
U211—Carbon tetrachloride
U219—Thiourea
U220—Toluene
U221—Toluenediamine
U223—Toluene diisocyanate
U226—Methylchloroform
U227—Trichloroethane, 1,1,2-
U228—Trichloroethylene
U237—Uracil mustard
U238—Ethyl carbamate
U248—Warfarin, when present at concentrations of 0.3% or less
U249—Zinc phosphide, when present at concentrations of 10% or less

# APPENDIX D
# TREATMENT STANDARDS

Waste Type: Pharmaceuticals Industry Subcategory Wastewater Revision

| Waste No. | BDAT | Constituents | Nonwastewaters Total Composition | Nonwastewaters TCLP | Wastewaters Total Composition (mg/l) | Wastewaters TCLP |
|---|---|---|---|---|---|---|
| F001-F005 | Wastewaters: Steam stripping process | Methylene Chloride | | | 0.44 | |

Waste Type: Wastewater Treatment Sludges from Electroplating. See Regulations for exceptions.

| Waste No. | BDAT | Constituents | Nonwastewaters Total Composition (mg/k) | Nonwastewaters TCLP (mg/l) | Wastewaters Total Composition (mg/l) | Wastewaters TCLP |
|---|---|---|---|---|---|---|
| F006 | Nonwastewaters: Stabilization process using cement kiln dust as a binding agent. | Cadmium | | 0.066 | | |
| | | Chromium (total) | | 5.2 | | |
| | | Lead | | 0.51 | | |
| | | Nickel | | 0.32 | | |
| | | Silver | | 0.72 | | |
| | Wastewaters: Soft Hammer | Cyanides | Reserved | Reserved | | |

Waste Type: Bottom Sediment Sludge from the Treatment of Wastewaters from Wood Preserving Processes that Use Creosote and/or Pentachlorophenol.

| Waste No. | BDAT | Constituents | Nonwastewaters Total Composition | Nonwastewaters TCLP (mg/kg) | Wastewaters Total Composition (mg/l) | Wastewaters TCLP |
|---|---|---|---|---|---|---|
| K001 | Nonwastewaters and Wastewaters: Organic Constituents - rotary kiln incinerator | Napthalene | 8.0 | | 0.15 | |
| | | Pentachlorophenol | 37.0 | | 0.88 | |
| | | Phenanthrene | 8.0 | | 0.15 | |
| | | Pyrene | 7.3 | | 0.14 | |
| | | Toluene | 0.14 | | 0.14 | |
| | | Xylenes | 0.16 | | 0.16 | |
| | Nonwastewaters: Metal Constituents - stabilization process | Lead | | 0.51 | 0.037 | |
| | Wastewaters: Metal Constituents - chemical precipitation | | | | | |

Waste Type: Still Bottoms from the Distillation of Benzyl Chloride

| Waste No. | BDAT | Constituents | Nonwastewaters Total Composition | Nonwastewaters TCLP | Wastewaters Total Composition (mg/l) | Wastewaters TCLP |
|---|---|---|---|---|---|---|
| K015 | Nonwastewaters: Liquid Injection Incinerator (based on premise of "no ash") | Anthracene | No land disposal | No land disposal | 1.0 | |
| | | Benzal Chloride | | | 0.28 | |
| | | Benzo (b and/or k) Fluoranthene | | | 0.29 | |
| | | Phenanthrene | | | 0.27 | |
| | Wastewaters: Organic Constituents- liquid injection incineration | Toluene | | | 0.15 | |
| | | Chromium (total) | | | 0.32 | |
| | Metal Constituents - chemical precipitation | Nickel | | | 0.44 | |

Waste Type: Production of Chlorinated Chemicals in the Organic Chemical Industry: heavy ends or distillation residues from the production of carbon tetrachloride (K016); heavy ends from the fractionation column in ethyl chloride production (K018); heavy ends from the distillation of ethylene dichloride in ethylene dichloride production (K019); heavy ends from the distillation of vinyl chloride in vinyl chloride monomer production (K020); column bottoms or heavy ends from the combined production of trichloroethylene and perchloroethylene (K030)

| Waste No. | BDAT | Constituents | Nonwastewaters Total Composition (mg/kg) | Nonwastewaters TCLP | Wastewaters Total Composition (mg/l) | Wastewaters TCLP |
|---|---|---|---|---|---|---|
| K016 | Nonwastewaters and Wastewaters: Organic Constituents - rotary kiln incineration | Hexachlorobenzene | 28 | | 0.033 | |
| | | Hexachlorobutadiene | 5.6 | | 0.007 | |
| | | Hexachlorocyclopentadiene | 5.6 | | 0.007 | |
| | | Hexachloroethane | 28 | | 0.033 | |
| | | Tetrachloroethene | 6.0 | | 0.007 | |
| K018 | | Chloroethane | 6.0 | | 0.007 | |
| | | Chloromethane | | | 0.007 | |
| | | 1,1-Dichloroethane | 6.0 | | 0.007 | |
| | | 1,2-Dichloroethane | 6.0 | | 0.007 | |
| | | Hexachlorobenzene | 28 | | 0.033 | |
| | | Hexachlorobutadiene | 5.6 | | 0.007 | |
| | | Hexachloroethane | 28 | | | |
| | | Pentachloroethane | 5.6 | | 0.007 | |
| | | 1,1,1-Trichloroethane | 6.0 | | 0.007 | |

| Waste No. | BDAT | Constituents | Total Composition (mg/kg) | TCLP | Total Composition (mg/l) | TCLP |
|---|---|---|---|---|---|---|
| K019 | | Bis(2-Chloroethyl)ether | 5.6 | | 0.007 | |
| | | Chlorobenzene | 6.0 | | 0.006 | |
| | | Chloroform | 6.0 | | 0.007 | |
| | | p-Dichlorobenzene | | | 0.008 | |
| | | 1,2-Dichloroethane | 6.0 | | 0.007 | |
| | | Fluorene | | | 0.007 | |
| | | Hexachloroethane | 2.8 | | 0.033 | |
| | | Naphthalene | 5.6 | | 0.007 | |
| | | Phenanthrene | 5.6 | | 0.007 | |
| | | 1,2,4,5-Tetrachlorobenzene | | | 0.017 | |
| | | Tetrachloroethene | 6.0 | | 0.007 | |
| | | 1,2,4-Trichlorobenzene | 19.0 | | 0.023 | |
| | | 1,1,1-Trichloroethane | 6.0 | | 0.007 | |
| K020 | | 1,2-Dichloroethane | 6.0 | | 0.007 | |
| | | 1,1,2,2-Tetrachloroethane | 5.6 | | 0.007 | |
| | | Tetrachloroethene | 6.0 | | 0.007 | |
| K030 | | o-Dichlorobenzene | | | 0.008 | |
| | | p-Dichlorobenzene | | | 0.008 | |
| | | Hexachlorobutadiene | 5.6 | | 0.007 | |
| | | Hexachloroethane | 28 | | 0.033 | |
| | | Hexachloropropene | 19 | | | |
| | | Pentachlorobenzene | 28 | | | |
| | | Pentachloroethane | 5.6 | | 0.007 | |
| | | 1,2,4,5-Tetrachlorobenzene | 14 | | 0.017 | |
| | | Tetrachloroethene | 6.0 | | 0.007 | |
| | | 1,2,4-Trichlorobenzene | 19 | | 0.023 | |

Waste Type: Distillation Bottom Tars from the Production of Phenol/Acetone from Cumene

| Waste No. | BDAT | Constituents | Nonwastewaters Total Composition (mg/k) | Nonwastewaters TCLP (mg/l) | Wastewaters Total Composition | Wastewaters TCLP |
|---|---|---|---|---|---|---|
| K022 | Nonwastewaters: Organic Constituents - fuel substitution unit Metal Constutuents - stabilization treatment process | Acetophenone | 19 | | | |
| | | Sum of Diphenylamine and Diphenylnitrosamine | 13 | | | |
| | | Phenol | 12 | | | |
| | | Toluene | 0.034 | | | |
| | | Chromium (total) | | 5.2 | | |
| | | Nickel | | 0.32 | | |

Waste Type: Distillation Bottom Tars from the Production of Phthalic Anhydride from Naphthalene

| Waste No. | BDAT | Constituents | Nonwastewaters Total Composition (mg/kg) | Nonwastewaters TCLP | Wastewaters Total Composition (mg/l) | Wastewaters TCLP |
|---|---|---|---|---|---|---|
| K024 | Nonwastewaters and Wastewaters: Rotary Kiln Incineration | Phthalic Acid | 28 | | 0.54 | |

Waste Type: Wastewater Treatment Sludge from the Production of Disulfoton

| Waste No. | BDAT | Constituents | Nonwastewaters Total Composition (mg/kg) | Nonwastewaters TCLP | Wastewaters Total Composition (mg/l) | Wastewaters TCLP |
|---|---|---|---|---|---|---|
| K037 | Nonwastewaters and Wastewaters: Rotary Kiln Incineration | Disulfoton<br>Toluene | 0.1<br>28 | | 0.003<br>0.028 | |

Waste Type: Explosives Industry: Wastewater Treatment Sludges from the Manufacturing and Processing of Explosives (K044); Spent Carbon from the Treatment of Wastewater Containing Explosives (K045); Pink/Red Water from TNT Operations (K047).

| Waste No. | BDAT | Constituents | Nonwastewaters Total Composition | Nonwastewaters TCLP | Wastewaters Total Composition | Wastewaters TCLP |
|---|---|---|---|---|---|---|
| K044<br>K045<br>K047 | Open detonation/ open burning/chemical deactivation | | No land disposal based on reactivity. | | No land disposal based on reactivity. | |

Waste Type: Wastewater Treatment Sludges from the Manufacturing, Formulation, and Loading of Lead-Based Initiating Compounds

| Waste No. | BDAT | Constituents | Nonwastewaters Total Composition | Nonwastewaters TCLP (mg/l) | Wastewaters Total Composition | Wastewaters TCLP |
|---|---|---|---|---|---|---|
| | Nonwastewaters (nonreactive subcategory): Stabilization Process | Lead | | 0.18 | | |

Waste Type: Petroleum Refining Industry: Dissolved Air Flotation Float (K048); Slop Oil Emulsion Solids (K049); Heat Exchanger Bundle Cleaning Sludge (K050); API Separator Sludge (K051); and Leaded Tank Bottoms (K052)

| Waste No. | BDAT | Constituents | Nonwastewaters Total Composition (mg/kg) | Nonwastewaters TCLP (mg/l) | Wastewaters Total Composition (mg/l) | Wastewaters TCLP |
|---|---|---|---|---|---|---|
| K048 | Nonwastewaters: Organic Constituents - solvent extraction and/or incineration Metal Constituents - stabilization process | Benzene | 9.5 | | 0.011 | |
| | | Benzo(a)pyrene | 0.84 | | 0.047 | |
| | | Bis(2-ethylhexyl)phthalate | 37 | | 0.043 | |
| | | Chrysene | 2.2 | | 0.043 | |
| | | Di-n-butyl Phthalate | 4.2 | | 0.060 | |
| | | Ethylbenzene | 67 | | 0.011 | |
| | | Fluorene | | | 0.050 | |
| | Wastewaters: Organic Constituents - incineration | Naphthalene | Reserved | | 0.033 | |
| | | Phenanthrene | 7.7 | | 0.039 | |
| | | Phenol | 2.7 | | 0.047 | |
| | Metal Constituents - chromium reduction, lime and sulfide precipitation, and vacuum filtration | Pyrene | 2.0 | | 0.045 | |
| | | Toluene | 9.5 | | 0.011 | |
| | | Xylenes | Reserved | | 0.011 | |
| | | Cyanides (total) | 1.8 | | | |
| | | Arsenic | | 0.004 | | |
| | | Chromium (total) | | 1.7 | 0.20 | |
| | | Nickel | | 0.048 | | |
| | | Selenium | | 0.025 | | |
| | | Lead | | | 0.037 | |
| K049 | | Anthracene | 6.2 | | 0.039 | |
| | | Benzene | 9.5 | | 0.011 | |
| | | Benzo(a)pyrene | 0.84 | | 0.047 | |
| | | Bis(2-ethylhexyl)phthalate | 37 | | 0.043 | |
| | | Carbon Disulfide | | | 0.011 | |
| | | Chrysene | 2.2 | | 0.043 | |
| | | 2,4-Dimethylphenol | | | 0.033 | |
| | | Ethylbenzene | 67 | | 0.011 | |

| | | | | |
|---|---|---|---|---|
| K049 | ntinued) | | | |
| | Naphthalene | Reserved | | 0.033 |
| | Phenanthrene | 7.7 | | 0.039 |
| | Phenol | 2.7 | | 0.047 |
| | Pyrene | 2.0 | | 0.045 |
| | Toluene | 9.5 | | 0.011 |
| | Xylenes | Reserved | | 0.011 |
| | Cyanides (total) | 1.8 | | |
| | Arsenic | | 0.004 | |
| | Chromium (total) | | 1.7 | 0.020 |
| | Nickel | | 0.048 | |
| | Selenium | | 0.025 | |
| | Lead | | | 0.037 |
| K050 | Benzo(a)pyrene | 0.084 | | 0.047 |
| | Phenol | 2.7 | | 0.047 |
| | Cyanides (total) | 1.8 | | |
| | Arsenic | | 0.004 | |
| | Chromium (total) | | 1.7 | 0.20 |
| | Nickel | | 0.048 | |
| | Selenium | | 0.025 | |
| | Lead | | | 0.037 |
| K051 | Acenaphthene | | | 0.050 |
| | Anthracene | 6.2 | | 0.039 |
| | Benzene | 9.5 | | 0.011 |
| | Benzo(a)anthracene | 1.4 | | 0.043 |
| | Benzo(a)pyrene | 0.84 | | 0.047 |
| | Bis(2-ethylhexyl)phthalate | 37 | | 0.043 |
| | Chrysene | 2.2 | | 0.043 |
| | Di-n-butyl Phthalate | 4.2 | | 0.060 |
| | Ethylbenzene | 67 | | 0.011 |
| | Fluorene | | | 0.050 |
| | Naphthalene | Reserved | | 0.033 |
| | Phenanthrene | 7.7 | | 0.039 |
| | Phenol | 2.7 | | 0.047 |
| | Pyrene | 2.0 | | 0.045 |
| | Toluene | 9.5 | | 0.011 |
| | Xylenes | Reserved | | 0.011 |
| | Cyanides (total) | 1.8 | | |
| | Arsenic | | 0.004 | |
| | Chromium (total) | | 1.7 | 0.20 |
| | Nickel | | 0.048 | |
| | Selenium | | 0.025 | |
| | Lead | | | 0.037 |
| K052 | Benzene | 9.5 | | 0.011 |
| | Benzo(a)pyrene | 0.84 | | 0.047 |
| | o-Cresol | 2.2 | | 0.011 |
| | p-Cresol | 0.90 | | 0.011 |
| | 2,4-Dimethylphenol | | | 0.033 |
| | Ethylbenzene | 67 | | 0.011 |
| | Naphthalene | Reserved | | 0.033 |
| | Phenanthrene | 7.7 | | 0.039 |
| | Phenol | 2.7 | | 0.047 |
| | Toluene | 9.5 | | 0.011 |
| | Xylenes | Reserved | | 0.011 |

| | | | | | | |
|---|---|---|---|---|---|---|
| K052 | ntinued) | Cyanides (total) | 1.8 | | | |
| | | Arsenic | | 0.004 | | |
| | | Chromium (total) | | 1.7 | 0.20 | |
| | | Nickel | | 0.048 | | |
| | | Selenium | | 0.025 | | |
| | | Lead | | | 0.037 | |

Waste Type: Emission Control Dust/Sludge from Primary Production of Steel in Electric Furnaces

| | | | Nonwastewaters | | Wastewaters | |
|---|---|---|---|---|---|---|
| Waste No. | BDAT | Constituents | Total Composition | TCLP (mg/l) | Total Composition | TCLP |
| K061 | Nonwastewaters: High Zinc (15% or greater) Subcategory - high temperature metals recovery unit (HTMR) Low Zinc (less than 15%) Subcategory - stabilization | Cadmium | | 0.14 | | |
| | | Chromium (total) | | 5.2 | | |
| | | Lead | | 0.24 | | |
| | | Nickel | | 0.32 | | |

Waste Type: Spent Pickle Liquor Generated by Steel Finishing Operations of Facilities Within the Iron and Steel Industries

| | | | Nonwastewaters | | Wastewaters | |
|---|---|---|---|---|---|---|
| Waste No. | BDAT | Constituents | Total Composition | TCLP (mg/l) | Total Composition (mg/l) | TCLP |
| K062 | Nonwastewaters and Wastewaters: Chromium Reduction, Chemical Precipitation with Sulfide, Settling, Filtering and Dewatering of Solid Residues | Chromium (total) | | 0.094 | 0.032 | |
| | | Lead | | 0.037 | 0.04 | |
| | | Nickel | | | 0.44 | |

Waste Type: Emission Control Dust/Sludge from Secondary Lead Smelting

| Waste No. | BDAT | Constituents | Nonwastewaters Total Composition | Nonwastewaters TCLP | Wastewaters Total Composition | Wastewaters TCLP |
|---|---|---|---|---|---|---|
| K069 | Nonwastewaters in Non-Calcium Sulfate Subcategory: recycling | | No land disposal based on recycling. | | | |

Waste Type: Brine Purification Muds from the Mercury Cell Process in Chlorine Production, where Separately Prepurified Brine is Not Used

| Waste No. | BDAT | Constituents | Nonwastewaters Total Composition | Nonwastewaters TCLP (mg/l) | Wastewaters Total Composition (mg/l) | Wastewaters TCLP |
|---|---|---|---|---|---|---|
| K071 | Nonwastewaters: Solubilize mercury in sludge and convert to insoluble mercury sulfide sludge. | Mercury | | 0.025 | 0.030 | |

Waste Type: Distillation Bottoms from Aniline Production

| Waste No. | BDAT | Constituents | Nonwastewaters Total Composition | Nonwastewaters TCLP | Wastewaters Total Composition | Wastewaters TCLP |
|---|---|---|---|---|---|---|
| K083 | Nonwastewaters and Wastewaters: No Ash Subcategory - Liquid injection incinerator | | No land disposal based on no ash. | | | |

Waste Type: S ent Washes and Sludges, Caustic Washes and Sludges, or Waterwashes and Sludges From the Cleaning of Tubs and Equipment Used in the Formulation of Ink Pigments, Driers, Soaps, and Stabilizers Containing Chromium and Lead

| Waste No. | BDAT | Constituents | Nonwastewaters Total Composition (mg/kg) | Nonwastewaters TCLP (mg/l) | Wastewaters Total Composition (mg/l) | Wastewaters TCLP |
|---|---|---|---|---|---|---|
| K086 | Nonwastewaters and Wastewaters, Solvent Washes Subcategory: Organic Constituents - incineration Metal Constituents - hexavalent chromium reduction, chemical precipitation with excess lime, filtration | Acetone | 0.37 | | 0.015 | |
| | | Bis(2-ethylhexyl)phthalate | 0.49 | | 0.044 | |
| | | n-Butyl Alcohol | 0.37 | | 0.031 | |
| | | Cyclohexanone | 0.49 | | 0.022 | |
| | | 1,2-Dichlorobenzene | 0.49 | | 0.044 | |
| | | Ethyl Acetate | 0.37 | | 0.031 | |
| | | Ethyl Benzene | 0.031 | | 0.015 | |
| | | Methanol | 0.37 | | 0.031 | |
| | | Methylene Chloride | 0.037 | | 0.031 | |
| | | Methyl Ethyl Ketone | 0.37 | | 0.031 | |
| | | Methyl Isobutyl Ketone | 0.37 | | 0.031 | |
| | | Naphthalene | 0.49 | | 0.044 | |
| | | Nitrobenzene | 0.49 | | 0.044 | |
| | | Toluene | 0.031 | | 0.029 | |
| | | 1,1,1-Trichloroethane | 0.044 | | 0.031 | |
| | | Trichloroethylene | 0.031 | | 0.029 | |
| | | Xylenes | 0.015 | | 0.015 | |
| | | Chromium (total) | | 0.094 | 0.32 | |
| | | Lead | | 0.37 | 0.037 | |

Waste Type: Decanter Tank Tar Sludge from Coking Operations

| Waste No. | BDAT | Constituents | Nonwastewaters Total Composition (mg/kg) | Nonwastewaters TCLP (mg/l) | Wastewaters Total Composition (mg/l) | Wastewaters TCLP |
|---|---|---|---|---|---|---|
| K087 | Nonwastewaters and Wastewaters: Organic Constituents - incineration in rotary kiln Metal Constituents - hexavalent chromium reduction, chemical precipitation with excess lime, filtration | Acenaphthalene | 3.4 | | 0.028 | |
| | | Benzene | 0.071 | | 0.014 | |
| | | Chrysene | 3.4 | | 0.028 | |
| | | Fluoranthene | 3.4 | | 0.028 | |
| | | Indeno (1,2,3-cd) pyrene | 3.4 | | 0.028 | |
| | | Naphthalene | 3.4 | | 0.028 | |
| | | Phenanthrene | 3.4 | | 0.028 | |
| | | Toluene | 0.65 | | 0.008 | |
| | | Xylenes | 0.070 | | 0.014 | |
| | | Lead | | 0.51 | 0.037 | |

Waste Type: Untreated Wastewater from the Production of 2,4-Dichlorophenoxyacetic Acid (2,4,D)

| Waste No. | BDAT | Constituents | Nonwastewaters Total Composition (mg/kg) | Nonwastewaters TCLP | Wastewaters Total Composition (mg/l) | Wastewaters TCLP |
|---|---|---|---|---|---|---|
| K099 | Nonwastewaters and Wastewaters: Chemical oxidation using chlorine. | 2,4-Dichlorophenoxyacetic Acid | 1.0 | | 1.0 | |
| | | Hexachlorodibenzo-p-dioxins | 0.001 | | 0.001 | |
| | | Hexachlorodibenzofurans | 0.001 | | 0.001 | |
| | | Pentachlorodibenzo-p-dioxins | 0.001 | | 0.001 | |
| | | Pentachlorodibenzofurans | 0.001 | | 0.001 | |
| | | Tetrachlorodibenzo-p-dioxins | 0.001 | | 0.001 | |
| | | Tetrachlorodibenzofurans | 0.001 | | 0.001 | |

Waste Type: Production of Vetinary Pharmaceuticals from Arsenic or Organo Arsenic Compounds: Distillation Tar Residues from the Distillation of Aniline-Based Compounds (K101); Residue from the Use of Activated Carbon for Discolorization (K102)

| Waste No. | BDAT | Constituents | Nonwastewaters Total Composition (mg/kg) | Nonwastewaters TCLP (mg/l) | Wastewaters Total Composition (mg/l) | Wastewaters TCLP |
|---|---|---|---|---|---|---|
| K101 | Nonwastewaters and Wastewaters: Low Arsenic (less than 1% total arsenic) Subcategory - incineration in rotary kiln | Ortho-Nitroaniline | 14 | | 0.27 | |
| | | Cadmium | | 0.066 | 2.0 | |
| | | Chromium (total) | | 5.2 | 0.24 | |
| | | Lead | | 0.51 | 0.11 | |
| | | Nickel | | 0.32 | 0.027 | |
| K102 | | Ortho-Nitrophenol | 13 | | 0.028 | |
| | | Cadmium | | 0.066 | 2.0 | |
| | | Chromium (total) | | 5.2 | 0.24 | |
| | | Lead | | 0.51 | 0.11 | |
| | | Nickel | | 0.32 | 0.027 | |

Waste Type: Production of Aniline and Nitrobenzene/Aniline Process Residues from Aniline Extraction (K103) and Combined Wastewater Streams Generated from Nitrobenzene/Aniline Production (K104)

| Waste No. | BDAT | Constituents | Nonwastewaters Total Composition (mg/k) | Nonwastewaters TCLP | Wastewaters Total Composition (mg/l) | Wastewaters TCLP |
|---|---|---|---|---|---|---|
| K103 | Nonwastewaters and Wastewaters: Organic Constituents - solvent extraction, steam stripping, activated carbon adsorption, and incineration | Aniline | 5.6 | | 4.5 | |
| | | Benzene | 6.0 | | 0.15 | |
| | | 2,4-Dinitrophenol | 5.6 | | 0.61 | |
| | | Nitrobenzene | 5.6 | | 0.073 | |
| | | Phenol | 5.6 | | 1.4 | |
| K104 | | Aniline | 5.6 | | 4.5 | |
| | | Benzene | 6.0 | | 0.15 | |
| | | 2,4-Dinitrophenol | 5.6 | | 0.61 | |
| | | Nitrobenzene | 5.6 | | 0.073 | |
| | | Phenol | 5.6 | | 1.4 | |
| | | Cyanides (total) | 1.8 | | 2.7 | |

Waste Type: Wastewater Treatment Sludge from the Production of Zinc Yellow Pigments

| Waste No. | BDAT | Constituents | Nonwastewaters Total Composition | Nonwastewaters TCLP | Wastewaters Total Composition | Wastewaters TCLP |
|---|---|---|---|---|---|---|
| K004 | No land disposal based on no generation. | | | | | |

Waste Type: Oven Residue from the Production of Chrome Oxide Green Pigments

| Waste No. | BDAT | Constituents | Nonwastewaters Total Composition | Nonwastewaters TCLP | Wastewaters Total Composition | Wastewaters TCLP |
|---|---|---|---|---|---|---|
| K008 | No land disposal based on no generation. | | | | | |

| Waste Type: | A. ous Spent Antimony Catalyst Waste From Fluoromethanes Production | | Nonwastewaters | | Wastewaters | |
|---|---|---|---|---|---|---|
| Waste No. | BDAT | Constituents | Total Composition | TCLP | Total Composition | TCLP |
| K021 | No land disposal based on no generation. | | | | | |

| Waste Type: | Distillation Bottoms from the Production of Nitrobenzene by the Nitration of Benzene | | Nonwastewaters | | Wastewaters | |
|---|---|---|---|---|---|---|
| Waste No. | BDAT | Constituents | Total Composition | TCLP | Total Composition | TCLP |
| K025 | No land disposal based on no generation. | | | | | |

| Waste Type: | Still Bottoms from Toluene Reclamation Distillation in the Production of Disulfoton | | Nonwastewaters | | Wastewaters | |
|---|---|---|---|---|---|---|
| Waste No. | BDAT | Constituents | Total Composition | TCLP | Total Composition | TCLP |
| K036 | No land disposal based on no generation. | | | | | |

| Waste Type: | Ammonia Still Lime Sludge from Coking Operations | | Nonwastewaters | | Wastewaters | |
|---|---|---|---|---|---|---|
| Waste No. | BDAT | Constituents | Total Composition | TCLP | Total Composition | TCLP |
| K060 | No land disposal based on no generation. | | | | | |

Waste Type: Wa. . Leaching Solution from Acid Leaching of Emission Control Dust/Sludge from Secondary Lead Smelting

| Waste No. | BDAT | Constituents | Nonwastewaters | | Wastewaters | |
|---|---|---|---|---|---|---|
| | | | Total Composition | TCLP | Total Composition | TCLP |
| K100 | No land disposal based on no generation. | | | | | |

SEPA Number: [illegible]

Facility Name: Clark Oil and Refining Corp.

Street: Hawthorne St P.O. Box 7

City: Hartford Telephone: 618/254-7301

County: Madison State: IL Zip Code: 62048

Type of Facility: Notified As: Generator Regulated As: Generator

LDF? yes __ no X HPV? yes __ no X 90 Day Follow-up Required? yes X no __

Region: 6 Date of Inspection: 2/2/89 From: 10:00 to 11:45 am.

Weather (LDF Only): _____

Type of Inspection

CSS: 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: 21 Key Letter: C

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

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

Part B permit application submitted? yes __ no X

Has the firm been referred to: USEPA? yes __ no X; IAG? yes __ no X; County States Attorney? yes __ no X. Date of referral to USEPA: _____, IAG: _____, County States Attorney: _____.

Federal Court Order Issued: _____ State Court Order Issued: _____

USEPA Compliance Order Issued: _____ Illinois PCB Order Issued: _____

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 8_ 8_ 8_ |
|---|---|---|---|---|---|---|---|
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Operator: Clark Oil and Refining Co. 618/254-730

Street: Hawthorne St. P.O. Box 7

City: Hartford State: IL Zip Code: 62048

Owner: Clark Oil & Refining Corp. Telephone #: 314/889-

Street: 8182 Maryland Ave

City: St Louis State: MO Zip Code: 63105

| Person Interviewed | Title | Telephone # |
|---|---|---|
| Richard Thomas | Environmental Eng. | 618/254-7301 |
| Joe Bean | Environmental Eng | 618/254-7301 |

| Inspection Participants | Agency/Title | Telephone # |
|---|---|---|
| Mike Grant | IEPA/EPS | 618/346-5120 |
| Wendy Schaufelberger | IEPA/EPS | 618/346-512 |

| Prepared By | Agency/Title | Telephone # |
|---|---|---|
| Michael D. Grant | IEPA/EPS | 618/346-5120 |

Summary of Apparent Violations

| Area | Class | Section |
|---|---|---|
| OTH | I | 722.134(a)(1+3) |
| | Specifically | |
| | | 725.293(a) |
| | | 725.296 |
| | | |
| | | |

| Area | Class | Section |
|---|---|---|
| | | |
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| Area | Class | Section |
|---|---|---|
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WASTE DISPOSITION FORM

Facility Name: Clark Oil and Refining USEPA #: ILD041889023 IEPA #: 1190500002

| 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 | Dispsit |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| DAF Float Slop oil emulsion solids API Separator sludge | WWT of Oily refinery wastewaters | Listed | K048 K049 K050 | Y | withdrawn | Not shipped off-site | | | 8600 Barrels (360,000 gallons) | 6,000 gallons a week | N/A STORED 10-2 processed | in TANK until in Coke ovens |
| Heat Exchanger bundle Cleaning Sludge | Sludge from Heat Exchanger | Listed | K050 | Y | N/A | Not shipped off-site | | | "0" | only during Turnaround of heat exchangers | N/A | on-site WW treatment plant |
| TANK BOTTOMS | Removed during Tank clean-outs. | All sludge (bottoms) is tested for lead. | K052 | Y | N/A | Yes | None generated | Yes | "0" | (Varies) during Tank clean-out only | 4/19/88 | BFI Winthrop Harbor |
| #1 Spent FCC Catalyst | Spent Catalyst from Cat Cracker | 12/19/88 | N/A Non-Haz | N/A | N/A | N/A | N/A | N/A | "0" | 50-100 yd 3 every 2 months | 10/20/88 | GSX Barton #2 |
| API Separator Sludge | Sludge removed from bottom of API Separators | Listed | K051 | Yes | N/A | None generated | | | "0" | only generated during Turnaround (on API maintenance) | 1/3/89 | LWD Calvert City, Ky |
| Oily wastewater Sludge | wastewater treatment sludge | 11/3/88 | N/A Non-Haz | N/A | N/A | N/A | N/A | N/A | 3-6,000 gallons | Hauled every other day | 2/02/89 | Peoria Disposal |
| Activated Alumina | Turnaround on the Alky unit | 12/10/87 | D004 Failed Arsenic EP Tox | Y | N/A | Not generated during Last 3 Years | | | 0 | Generated during Turnaround of Alky Unit | 2/19/88 | PDC |
| | | | | | | | | | | | | |

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1190500002 - Madison County
Hartford/Clark Oil and Refining
ILD041889023

Remarks

Clark Oil and Refining is currently processing 60,000 barrels of crude per day. The facility no longer produces leaded gasoline and all leaded gasoline has been removed from the facility. Per Mr. Thomas, during tank clean-outs, the sludge generated was tested for lead. If lead was detected, the waste was handled as K052. The last shipment of K052 was April 19, 1988. During our inspection, there was no K052 on-site. Other listed refinery wastes generated are DAF float - K048, Slop Oil Emulsion solids - K049, Heat Exchanger bundle cleaning sludge - K050, and API Separator Sludge - K051.

The K050 wastestream is only generated during turnaround on the heat exchangers. Turnaround refers to the process of shutting down a unit or process to provide necessary repairs and maintenance. This sludge is treated in the facility's on-site wastewater treatment permit. The K048, K049 and K051 wastestreams are reused to produce petroleum coke. These wastes are pumped to Tank 10-2 for temporary storage prior to being pumped to the Coker units. As a result, Tank 10-2 is classified as a storage tank. However, because the facility generated the waste and does not store the waste for greater than 90 days, a RCRA permit is not required. Not all K051 is reused in this manner. During turnaround, the heavier K051 sludge which settles to the bottom of the separator is removed and packaged for shipment off-site. This last shipment of the heavier sludge was shipped on January 3, 1989.

Other wastes are generated during periods of turnaround. The only other wastes generated routinely are the spent catalyst and wastewater treatment sludge. Both of these wastes are non-hazardous. The spent catalyst is shipped to GSX-Barton (SW Permit #841332) and the wastewater treatment sludge is shipped to Peoria Disposal Company (SW Permit #941676).

The facility's paperwork was reviewed and no deficiencies were observed in conjunction with the Part 722 requirements. The deficiencies observed are related to Tank 10-2 and the regulations set forth in Subpart J of Section 725, pursuant to 722.134(a)(1). Per Mr. Thomas, the tank is approximately 50 years old. Containment is provided, however it consists only of earthen berms. Secondary containment meeting the requirements set forth in Section 725.293 has not been provided for Tank 10-2. Secondary Containment was required for this tank by January 12, 1989 pursuant to Section 725.293(a)(4). Not only is the required secondary containment not provided, but significant visual contamination was observed within the earthen berm of Tank 10-2. Where tank systems have had leaks or spills, the facility should immediately discontinue use of the tank system and implement the requirements of Section 725.296. It appears the spillage observed is years of accumulation of waste drippage and spillage. Also the tank is not labelled with the words "hazardous waste" as required by 722.134(a)(3). As a result, apparent violations of Section 722.134(a)(1&3) were observed.

The specific requirements of 722.134(a)(1) being alleged are 725.293 and 725.296.

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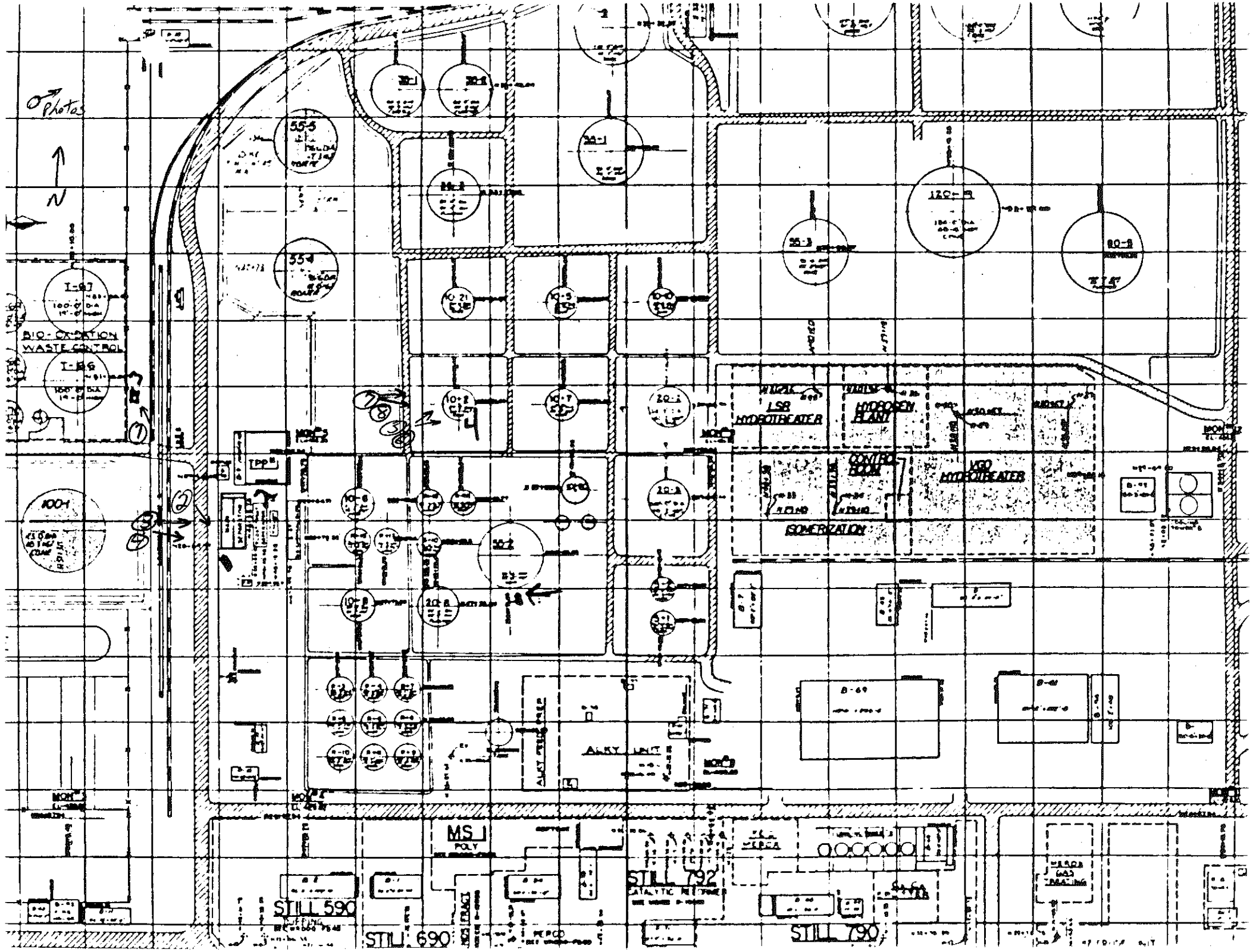
Photos
N
BIO-OXIDATION
WASTE CONTROL
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ALKY UNIT
MS I
POLY
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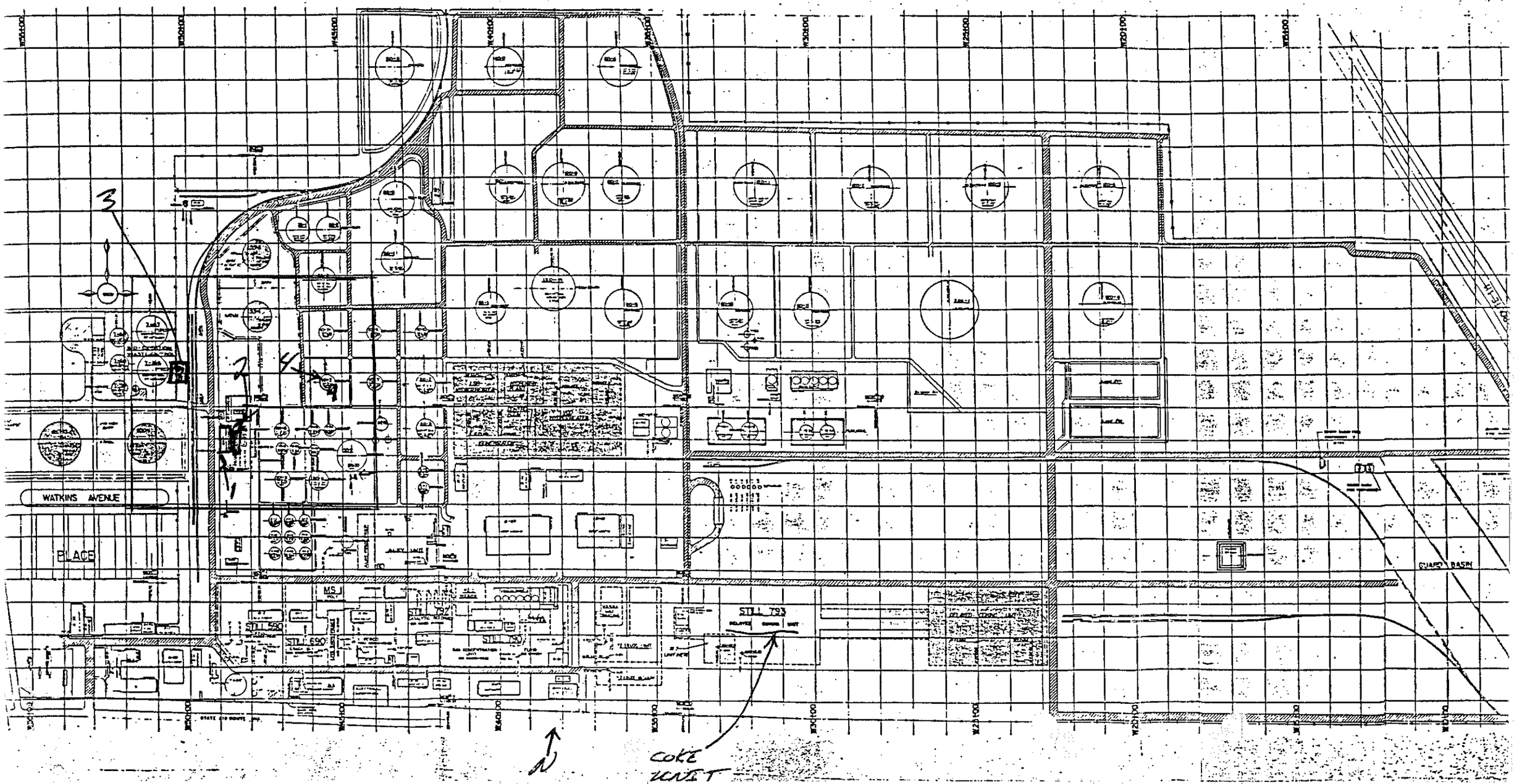
STILL 690
STILL 792
STILL 790

1.- API Seperator
2.- DAF UNIT
3.- Drum STORAGE PAD
4.- TANK 10-2



USEPA Number: ILD041889023 IEPA Number: 1190500002

Facility Name: Clark Oil and Refining Corp

Street: Hawthorne Street P.O. Box 7

City: Hartford Telephone: 618/254-7301

County: Madison State: Ill Zip Code: 62048

Type of Facility: Notified As: Generator Regulated As: Generator

LDF? yes __ no ✓ HPV? yes __ no ✓ 90 Day Follow-up Required? yes __ no ✓

Region: 6 Date of Inspection: 11/17/87 From: 9:00 to 10:45

Weather (LDF Only): _____

Type of Inspection

ISS: ___ Sampling: __ Citizen Complaint: __ Closed: __ Withdrawal: __

Record Review: __ Follow-up to Inspection of _____: __ Other: X

See Memo Dated 11/19/87

Non Regulated Status

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

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

Notification date, _____, from initial __ or subsequent __ notification.

Part A date, _____, from initial __ or amended __ Part A.

Part B permit application submitted? yes __ no __

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

Federal Court Order Issued: _____ State Court Order Issued: _____

USEPA Compliance Order Issued: _____ Illinois PCB Order Issued: _____

D 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 8_ 8_ 8_ |
|---|---|---|---|---|---|---|---|
| | | | | | | | |
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# M E M O R A N D U M

DATE: November 19, 1987

TO: LPC - Division File

FROM: Mike Grant

SUBJECT: 1190500002 - Madison County - Hartford/Clark Oil Refining Corp.
ILD041889023
RCRA-FOS

On November 17, 1987, I accompanied Ms. Lilly Herskovits, USEPA Region V to the subject facility. The purpose of the visit was to select the sampling points from the locations outlined in the attached sampling plan with which Ms. Herskovits had supplied me. Upon arrival, we met with the three Metcalf Eddy representatives who were to do the sampling. Representing the facility during this visit were Gene Knipping and Joe Bean, Environmental Engineers. The sampling event was going to take three days, with samples being taken three times each day. The samples would be composited and a sample representing each day would be analyzed. However, soil samples from the Tank 10-6, R-13, and R-16 containment areas would only be taken once. Clark elected to split samples.

The points to be sampled three times each day are as follows:

1. API Separator influent
2. API Separator return flow from the "pit",
3. Sludge in the pit and API Separator;
4. The line pits associated with the HF Alkyl unit.

During our visit, the HF Alkyl unit was not operating as it was going through what is termed "turnaround". Per Mr. Bean, this unit goes through "turnaround" once every four years. "Turnaround" is basically inspecting and providing maintenance to the unit. This activity takes three to four weeks. We then toured the facility to locate the exact sampling points. Several photographs were taken. Copies of the photos taken by me were requested by Ms. Herskovits and Mr. Knipping.

MDG:jlr/0009L

cc: DLPC - Collinsville

RECEIVED
NOV 23 1987
IEPA/DLPC

SAMPLING PLAN

Clark Oil and Refining
P.O.Box 7
Hartford, IL 62048
ILD 041 889 023

## GENERAL INFORMATION

Clark Oil and Refining Company is located in Wood River , Illinois.
It is a typical Oil Refinery with the conventional process units.
Its RCRA status: generator only.
According to information provided by the facility all the listed refinery waste streams are recycled to the coker unit, except the DAF sludge, which is sent out to a RCRA approved hazardous waste landfill.
There are two storage tanks at the site that are used for leaded gasoline storage (35-1 and 35-2) no sludge was ever found in these tanks therefore Clark claims that no K052 is generated in Wood River.

## SAMPLING OBJECTIVE

To sample the API separator influent and return flow to clarify if the return flow meets the equivalency test; is it better or equivalent to influent flow quality.
To analyze the sludge in the "PIT" for lead and chromium to establish the hazardousness of the sludge.

## SAMPLING LOCATIONS

The following samples to be taken at Clark Oil:
1. API separator influent
2. API separator Return flow from the "PIT"
3. Sludge in PIT and API separator
4. Soil in the containment areas of tanks 10-6, R-13, R-16
5. Influent and effluent of the spent caustic tank (HF Alkyl Unit)

RECEIVED
NOV 23 1987
IEPA/DLPC

## ANALYTICAL PARAMETERS

| All water samples shall be tested for: | Method |
|---|---|
| VOA, Semi-volatiles | CLP protocol 780 |
| pH, | SW 846/9040 |
| Oil & Grease | St.Methods for Examination of Water/Wastewater |
| Total/Reactive Sulfides | SW 846/8310 and 9010 |
| EP-TOX metals | SW 846/6010 and 7191/7421 |
| TSS | SMFEWW 209.D /ASTM D4007 |

The Sludge samples shall be tested for:
EP-TOX metals
VOA
Total solid content

Soil samples shall be analyzed for RAS organics and inorganics.

RECEIVED
IEPA
NOV 1? 1987
COLLINSVILLE OFFICE

DLPC
Received
11/17/8

## INSTRUCTIONS TO THE EMPLOYEE

1. Refer to your position description, organization's workplans, supervisor's Performance Agreement, etc. for guidance in preparing this document.

2. First, complete Section A, Critical Job Elements, by listing your major responsibilities in 4 - 7 broad categories which express what you do and why you do it.

3. Each objective and corresponding set of measures constitutes a performance standard and should be written on a separate page. Identify the 6 - 10 key objectives that stem from your Critical Job Elements, those important *results* which you plan to achieve during this performance period. List these in Section B.

4. For each objective, list the measures (also in Section B) that will be used to evaluate whether you have met your objectives and to what extent.

5. Add assumptions if external factors are likely to affect your performance.

6. Once the performance standards are written, assign weights to each standard which reflect relative importance. Weights should be at least 10 points. The combined weights of all standards must total 100 points. No weight should be assigned to personal growth standards.

7. Be sure that each standard is: a) related to a single corresponding Critical Job Element; b) numbered; and c) identified as ongoing, current-year, or personal growth.

8. This document must be discussed with and reviewed and approved by your immediate supervisor and then reviewed and approved by your second-level supervisor, at the minimum. Management has the final authority to set the Critical Job Elements performance standards measures and weights for your position. Use Section C for signatures.

9. The supervisor retains the original copy of this document once it is approved and provides a copy to you.

## INSTRUCTIONS TO SUPERVISORS

1. Once this document is drafted, you and your employee should discuss it and make changes if appropriate.

2. The supervisor is responsible for the consistency and equity of the Performance Agreements for all subordinates.

3. Once approved by the supervisor, the Agreement must be reviewed and approved by the next level supervisor. In some organizations, managers at higher levels may also want to review and/or approve employee Performance Agreements.

4. The supervisor keeps the approved Performance Agreement in the employee's working file during the performance period covered by it and provides a copy to the employee.

5. At the time of the appraisal, the supervisor uses Section D as the summary sheet for recording the discussion and final performance appraisal of the employee. Complete directions for the appraisal process are outlined in the Performance Management System guidance, which is available from the servicing personnel office.

   Once the appraisal is final, the Approving Official posts information in the sections titled "Compensation Decisions" and "Other Personnel Action Decisions." *For SES employees,* the compensation section reflects the Approving Official's final decisions on SES bonuses and pay level adjustments. *For Merit Pay employees,* the Pool Manager posts the employee's prior base salary, the percentage and dollar amount of the merit increase, and the percentage and amount of the total compensation. The employee's new base salary is also included, as well as the amount of cash award (if appropriate). *For non-SES/non-Merit Pay employees,* the Approving Official includes decsions on a QSI or performance-based cash award, if appropriate.

   Information in the "Other Personnel Action" section might include actions such as detail, reassignment, career promotion, adverse action, etc.

   When the process is complete and all signatures are affixed, the supervisor detaches Section D, provides a copy to the employee, retains a copy in the employee's working file, and submits the original to the servicing personnel office for inclusion in the Employee's Performance File.

SAMPLING PROCEDURES

Take samples three times a day, and composite the three samples into one daily sample. Make this for three days, that will result in three composite samples for both water and sludges. The EP-TOX samples shall be forwarded to EPA Region V. Central Regional Laboratory (CRL). The rest of the samples go through SMO. Most of the analytical work is a Special Analytical Request and SMO will assign the respective laboratory for the tests requested.

SPECIAL INSTRUCTIONS

Bottle requirements are defined by the test methods used; therefore the necessary type and number of bottles shall be selected accordingly.
The team leader, responsible for sampling inspection, shall contact the regional SMO (Jan Pels) at (312) 353-2720 for case numbers and laboratory assignments.
The samples going to Region V., CRL shall be shipped out daily, the rest of the samples should be shipped out according to SMO instructions.

RECEIVED
NOV 23 1987
IEPA/DLPC

ENVIRONMENTAL PROTECTION AGENCY

INSPECTION REPORT

USEPA Number: ILD041889023 IEPA Number: 1190500002

Facility Name: Clark Oil and Refining Corp

Street: Hawthorne Street P.O. Box 7

City: Hartford Telephone: 618/254-7301

County: Madison State: Ill Zip Code: 62048

Type of Facility: Notified As: Generator Regulated As: Generator

LDF? yes __ no ✓ HPV? yes __ no ✓ 90 Day Follow-up Required? yes __ no ✓

Region: 6 Date of Inspection: 7/22/87 From: 9:40 to 12:50

Weather (LDF Only): _____

Type of Inspection

ISS: ___ Sampling: __ Citizen Complaint: __ Closed: __ Withdrawal: __

Record Review: __ Follow-up to Inspection of _____: __ Other: X

See Memo Dated 8/3/87

Non Regulated Status

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

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

Notification date, _____, from initial __ or subsequent __ notification.

Part A date, _____, from initial __ or amended __ Part A.

Part B permit application submitted? yes __ no __

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

Federal Court Order Issued: _____ State Court Order Issued: _____

USEPA Compliance Order Issued: _____ Illinois PCB Order Issued: _____

TSD Facility Activity Summary

| Activity(By Process Code) | On Pt A | Activity Conducted Prior to 1980 | Was Activity Ever Done | Closed | Being Done at Time of Inspection | Exempt From Regulation per 35 IAC, Section: | On Annual Report For 8_ 8_ 8_ |
|---|---|---|---|---|---|---|---|
| | | | | | | | |
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| | | | | | | | |
| | | | | | | | |
| ✓ | | | | | | | |

RECEIVED
AUG 18 1987
IEPA/DLPC

Completed by Mike Grant

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

DATE: May 15, 1986

SUBJECT: Clark Oil/Wood River - ILD 041889023

FROM: James N. Mayka, Chief
Illinois Unit/TPS/SWB

TO: William E. Muno, Chief
RCRA Enforcement Section, HWEB

This is to request a §3007 compliance inquiry action on the Wood River facility of Clark Oil Company. Clark Oil requested its RCRA status to be changed from TSD to generator in 1983. At that time, U.S. EPA approved this change. Since August 7, 1984, Clark Oil has operated as a generator of hazardous wastes.

On April 30, 1986, Lily Herskovits inspected Shell Oil Company in Wood River. This facility is adjacent to Clark Oil. She has some reservations regarding Clark Oil's compliance with the RCRA regulations. One of her concerns is that the area public water sources are contaminated with petroleum products. For further information, please see the attached memo written by her on above subject.

Please keep me informed as to what action will be taken on the subject facility.

cc: Joseph Boyle

May 15, 1986

Clark Oil/Wood River - ILD 041889023

James N. Mayka, Chief
Illinois Unit/TPS/SWB

William E. Muno, Chief
RCRA Enforcement Section, HWEB

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On April 30, 1986, Lily Herskovits inspected Shell Oil Company in Wood River. This facility is adjacent to Clark Oil. She has some reservations regarding Clark Oil's compliance with the RCRA regulations. One of her concerns is that the area public water sources are contaminated with petroleum products. For further information, please see the attached memo written by her on above subject.

Please keep me informed as to what action will be taken on the subject facility.

cc: Joseph Boyle

According to Joe Boyle I might write this letter to Clark Oil.

5HS-13:L.Herskovits:fr:5/15/86

cm 5/15/86

| | TYP. | AUTH. | IL. CHIEF | IN. CHIEF | MI. CHIEF | MN/WI CHIEF | OH. CHIEF | TPS CHIEF | WMB CHIEF | WMD DIV. |
|---|---|---|---|---|---|---|---|---|---|---|
| INIT. DATE | FE 5/15/86 | LH 5/15/86 | | | | | | | | |

May 9, 1986

Request to review Clark Oil Refinery
Compliance with RCRA Regulations - ILD 041889023

Lily Herskovits
Chemical Engineer

Jim Mayka, Chief
Illinois Unit, TPS

This is to inform you that I wish to request more information on Clark Oil waste handling practices and initiate a compliance inquiry site inspection by our enforcement officials.

It is suggested because when I inspected Amoco and Shell Oil Company on April 29-30, 1986, and observed that the adjacent Clark Oil Company has a large coke pile. It is not covered and coke, or another black substance covers the nearby area. The Company has a typical oil refinery operation and therefore handles K048, K049, K050, K051 and K052 wastes. It is unlikely that all the above wastes are moved within 90 days.

Background information: Clark Oil has had generator status since August 7, 1984. It is based on their request of August 2, 1983, to amend the Part A filed on November 23, 1982. At the same time, Clark Oil notified U.S. EPA that they were in the process of building a weathering pad for leaded tank bottoms.

Our reply indicated that we removed the TSD status from our records and accepted that Clark Oil is just a generator, however, we advised at the same time that the weathering pad is not covered by interim status, therefore, a full permit is required before building it. No further information was received from Clark Oil on the above subject.

cc: Bill Muno ✓

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

MAR 11 1986

OFFICE OF
SOLID WASTE AND EMERGENCY RESPONSE

Mr. John T. Bernbom
Director, Environmental Control
Clark Oil & Refining Corporation
Blue Island Refinery
P.O. Box 297
Blue Island, Illinois 60406

Dear Mr. Bernbom:

We have reviewed your responses to the RCRA Section 3007 Questionnaires for your Blue Island, Illinois, and Hartford, Illinois refineries that were received by the EPA on June 11, 1985. As we explained in an earlier letter which primarily addressed catalytic cracking operations at your facilities, we are now submitting inquiries on the remainder of your questionnaires. The specific questions of concern are identified on the enclosures.

We are requesting a response to the questions listed on the enclosures under the authority of Section 3007. Failure to respond, or to make a reasonable effort to respond to a Section 3007 information request is a violation of federal law and may be the basis for the initiation of an enforcement action under Section 3008 of RCRA. The possible consequences of such an action are defined in the statute and include administrative or judicial enforcement action, with potential penalties under Section 3008 of RCRA of up to $25,000 per day for each day of continued noncompliance.

Because we are working under stringent deadlines and since the information requested should require minimal additional work, we are allowing thirty days for submission of your response. Please note that because of the time constraints under which we are working, we will not be granting any extensions to this deadline. Please immediately contact Ben Smith at (202) 382-4791 upon receipt of this letter if you have any difficulties with respect to this request. Responses should be sent to: Ms. Dina Villari, U.S. EPA, Office of Solid Waste (WH-562B), 401 M Street, S.W., Washington, D.C. 20460.

Sincerely,

Francine S. Jacoff

Francine S. Jacoff
Program Manager
Waste Listing Program

Enclosures: Two Lists of Questions (Confidential)

RECEIVED
MAR 17 1986
CLARK OIL &
REFINING CORPORATION

Security Information (E.O. 12065)

Questions for Clark Oil & Refining Corp., Blue Island, IL

1. Do you generate a spent caustic or spent catalyst from your Merox sweetening process? If so, assign RIN's to these residuals and provide the information requested in Table IV.

2. The following questions refer to your wastewater treatment system:

   a) Does the flow rate of wastewater from refinery operation reported in 6.B include the flow rates from the other sources listed in the question?

   b) Do you generate sludge in the equalization tank? If so, assign a RIN to this residual and provide the information requested in Table IV.

   c) Do you generate sludge in the process oily water sumps? If so, assign a RIN to this residual and provide the information requested in Table IV.

   d) Please provide the dimensins of and flow rates through all units that comprise the wastewater treatment system.

3. The following questions relate to your slop oil system:

   a) Do you generate sludge in the slop oil tanks? If so, assign RIN 102 to the sludge and provide the information requested in Table IV for this residual.

   b) Which process receives your recovered oil from the slop tanks? Is the recovered oil charged directly to this process, or is it stored in intermediate tankage with other charge stock to the unit? What percentage of the feed to the unit does the recovered oil comprise?

4. What is done with solids from tube bundle cleaning? Please assign RIN 104 to this residual and complete Table IV, as requested in Question 6.G of the questionnaire.

5. Please provide estimates of the cleaning frequency for gasoline and fuel oil tanks in Question 6.H of the questionnaire.

6. The following requests refer to Table IV:

   a) Please provide separate entries in Table IV for RIN's 22 and 24, settled solids from the API separator and DAF unit, respectively.

Questions for Clark Oil & Refining Corp., Blue Island, IL (Cont.)
(Continued)

b) Please report spent caustic residuals, RIN's 3, 4, 5, and 11, separately in Table IV. Classify each spent caustic as sulfidic, phenolic, or cresylic.

c) Are RIN's 8, 10, and 15 discharged directly to a POTW without pretreatment? Describe any treatment these residuals receive prior to discharge.

d) For each residual listed in your amended Table IV that had zero quantity generatd during 1983, provide or estimate a typical quantity generated for another year. Please report the year in which your reported quantity was generated and the number of years over which the quantity had accumulated.

e) For the residuals listed in the amended Table IV, provide the results of any existing analyses for metal and organic constituents.

f) For all cyclicly generated residuals, please specify the frequency of generation in Table IV, Column I.

7. Please specify the residuals, by RIN, which are handled by each off-site facility listd in Table V.

8. Do you have any surface impoundments? The definition of a surface impoundment is given in Question 8 of the questionnaire. Please complete Table VI in Question 8 for each surface impoundment at your facility.

CONFIDENTIAL

**CLARK OIL & REFINING CORPORATION**

June 5, 1985

Ms. Dina Villari
Waste Characterization and Assessment Division (WH-562)
Office of Solid Waste
U.S. Environmental Protection Agency
401 M Street, S.W.
Washington, D.C. 20460

Subject: RCRA Section 3007 Questionnaire
Petroleum Refining Section

Dear Ms. Villari:

Enclosed are two completed questionnaires. One is for the Blue Island refinery and the other is for the Wood River (Hartford) refinery.

The information submitted in both questionnaires is claimed confidential and a red trade secret marking has been applied to the pages of the questionnaire.

Each of the questionnaires is RCRA Confidential Business Information and is contained in a double envelope. The inner envelope is addressed to you as appropriate contact person and has the following additional wording on the front: "RCRA Confidential Business Information - To Be Opened By Addressee Only". The outer envelope is addressed to you as appropriate contact person without the additional wording. Both double envelopes and this letter are being transmitted in one large envelope by registered mail, return receipt requested.

Very truly yours,

John T. Bernbom
Director, Environmental Control

JTB:dlg

Enclosures: Blue Island Questionnaire
Wood River Questionnaire

131st & Kedzie Avenue Post Office Box 297 Blue Island, Illinois 60406 (312) 928-5200

August 2, 1983

RECEIVED
SEP 10 1983
CLARK OIL & REFINING CORPORATION

Mr. Andrew Vollmer
Illinois Environmental Protection
Agency
Division of Land Pullution Control
2200 Churchill Road
Springfield, Illinois 62706

Re: Wood River Refinery ILD041889023

Dear Mr. Vollmer:

This letter is in response to recent correspondence from Mr. Kuykendall, received on July 28, 1983.

Please be advised that Clark Oil & Refining Corporation does not store, treat or dispose of hazardous wastes. As a result, we believe that the financial assurance requirements are not applicable.

We recognize that Clark has Interim Status to store, treat and dispose. By the enclosed correspondence to USEPA, we are requesting that this status be modified.

Sincerely,

John T. Bernbom
Director of Environmental Control

Enclosure

cc: USEPA

cel

fc: JLW

EPA

April 6, 1983

Robert G. Kuykendall
Manager
Division of Land Pollution Control
Environmental Protection Agency
2200 Churchill Road
Springfield, Illinois 62706

Re: LPC #11905002 - Madison County

Dear Mr. Kuykendall:

Your recent letter to S. L. VanPetten has been referred to me for a response.

Your letter states that "hazardous waste (was) disposed of at your facility since April 1, 1980." Review of our records reveals that this has not occurred.

We believe that your letter was not intended for Clark since Clark does not engage in on-site disposal of hazardous waste. However, we will be pleased to meet with you if a meeting is still considered necessary.

Sincerely,

John T. Bernbom

cc: S. L. VanPetten

cel

1.S.S.

ENVIRONMENTAL PROTECTION AGENCY STATE OF ILLINOIS

L P C F C 0 5 5 C
(1) (8) (9) ILD041889023

OBSERVATION REPORT - SITE INVENTORY NO. L1905002
(11) (18)

MADISON CO. - L.P.C. Region # 5 Date 072381
(20) (25)

HARTFORD / CLARK OIL & REFINING Letter Sent (Yes or No) No
(Location) (Responsible Party) (26)

Samples Taken: Yes ( ) No (X) Time: From 09:45 am Weather RAINY, MUDDY, ≈65°
Ground Water( ) Surface( ) Other( ) To 12:00 pm
Photos Taken: Yes ( ) No (X) Interviewed S. VAN PETTEN, C.E. KNIPPING Inspector D M S
(27) (29)

Previous Inspection — Previous Correspondence — Site Open: Yes (X) No( )

| OPERATIONAL STATUS: | | TYPE OF OPERATION: | | | | AUTHORIZATION: | |
|---|---|---|---|---|---|---|---|
| Operating | (X) | Landfill | ( ) | Storage | (X) | E.P.A. Permit | (X) |
| Temporarily Closed | ( ) | Random Dump | ( ) | Salvage | ( ) | Variance | ( ) |
| Closed Not Covered | ( ) | Other GENERATOR | (X) | A.C.D. | ( ) | 21(e) | ( ) |
| Closed and Covered | ( ) | Quantity Received Daily(1-6) | 1 (30) | | | Board Order | ( ) |
| | | | | | | Illegal (5) | ( ) (31) |

IMPROVED

SAME

DETERIORATED

RECEIVED
JUL 27 1981
E.P.A. — D.L.P.C.
STATE OF ILLINOIS

LPC 4 1/79 5,000

I (S) or D 5
(62)

GENERAL REMARKS: Clark Oil & Refining Corporation principly refines petroleum products. Mr. S.L. Van Petten, C.E. Knipping, and G.E. Burkhart of Clark Oil were interviewed. Mr. Van Petten and Mr. Knipping accompanied me on the inspection of the storage/treatment tanks. At this time, several of the hazardous wastes were not present, as the sludge had not yet been removed from the bottom of the tanks. The site appears to have met most of the criteria under Interim Status Standards, with a few minor deficiences. A signal system to notify when an evacuation is needed is not listed in

INTERVIEW: the Contingency Plan. Other areas regarding personnel training, safety equipment, inspections, waste analysis, and manifesting appear to have been adequately addressed.

DIAGRAM:

| NAME | AGENCY | TITLE | PHONE # |
|---|---|---|---|
| Mike Grant | IEPA/BOL (RCRA) | EPS IV | 618/346-5120 |
| MARK JOHNSON | IEPA-OCS/ERU (TSCA) | EPS II | " |
| Tom Powell | IEPA " " | EPS | " |
| Jeff Benkenek | " - BOA/FOS | PSA | " |
| Chris Cahnovsky | IEPA/BOL/RCRA | EPS III | " |
| Jim Morgan | IL ATTY GEN | Senior AAG | 217-524-7506 |
| SILVIA PALOMO | U.S. EPA | ENVIRONMENTAL ENG | (312) 353-2172 |
| Cyd Curtis | U.S. EPA | Environmental Scientist | (312) 353-6959 |
| Mike RIBORDY | U.S EPA | Geologist | (312) 886-4592 |
| JEFFREY M. COX | US EPA | Asst. Regional Counsel | 312.353.3112 |
| Jerry Barnhill | Clark Oil (Port Arthur) | Mgr. EHS | 409.985.1838 |
| on Singer | MBP | | 312-782-0600 |

11905002
STATE IDENTIFICATION NUMBER
(If Applicable)

ILD041889023
EPA IDENTIFICATION NUMBER

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

RECEIVED
JUL 27 1981
E.P.A. — D.L.P.C.
STATE OF ILLINOIS

I. General Information:

(A) Facility Name: CLARK OIL & REFINING COORPORATION

(B) Street: HAWTHORNE STREET

(C) City: HARTFORD (D) State: ILLINOIS (E) Zip Code: 62048

(F) Phone: 618/254-7301 (G) County: MADISON

(H) Operator: CLARK OIL & REFINING COORPORATION

(I) Street: HAWTHORNE STREET

(J) City: HARTFORD (K) State: ILLINOIS (L) Zip Code 62048

(M) Phone: 618/254-7301 (N) County: MADISON

(O) Owner: CLARK OIL & REFINING COOPORATION

(P) Street: HAWTHORNE STREET

(Q) City: HARTFORD (R) State: ILLINOIS (S) Zip Code: 62048

(T) Phone: 618/254-7301 (U) County: MADISON

(V) Date of Inspection: 7-23-81 (W) Time of Inspection (From) 9:45a. (To) 12:00p

(X) Weather Conditions: RAINING, MUDDY, WINDY, ≈65°

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

| (Y) Person(s) Interviewed | Title | Telephone |
|---|---|---|
| S.L. VAN PETTEN | MGR. CONSTR. & SERVICES | 618/254-7301 |
| C.E. KNIPPING | ENVIRONMENTAL ENGINEER | 618/254-7301 |
| G.E. BURKHART | MANAGER | 618/254-7301 |

| (Z) Inspection Participants | Agency/Title | Telephone |
|---|---|---|
| S.L. VAN PETTEN | CLARK/MGR. CONSTR. & SERV. | 618/254-7301 |
| C.E. KNIPPING | CLARK/ENVIRN. ENGINEER | 618/254-7301 |
| DIANE M. SPENCER | I.E.P.A/ENVIRN. PROT. SPECIALIST | 618/345-4606 |

(AA) Preparer Information

| Name | Agency/Title | Telephone |
|---|---|---|
| DIANE M. SPENCER | I.E.P.A./ENV. PROT. SPECIALIST | 618/345-4606 |

## II. SITE ACTIVITY:

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

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

___ B. Land Treatment (M)

___ C. Landfills (N)

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

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

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

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

| | Yes | No | NI* | Remark |
|---|---|---|---|---|
| (A) Has the Regional Administrator been notified regarding: | | | | |
| 1. Receipt of hazardous waste from a foreign source? | | N/A | | |
| 2. Facility expansion? | | N/A | | |
| (B) General Waste Analysis: | | | | |
| 1. Has the owner or operator obtained a detailed chemical and physical analysis of the waste? | ✓ | | | |
| 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? | | N/A | | |
| (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: [redacted] | | | | |
| 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? | | ✓ | | |
| (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:

OWN WATER SUPPLY

ADEQUATE FOAM SUPPLY

| | | | | |
|---|---|---|---|---|
| (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? N/A

## 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.) | ✓ | | | AMENDED SPCC IN REGARD TO HAZ. WASTE |
| 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? | ✓ | | | |
| 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? | ✓ | | | NO LISTING OF PHYSICAL 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?) | ✓ | | | NO LISTED SIGNAL(S) TO BEGIN EVACUATION |

*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? | | N/A | | |

## 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? | ✓ | | | |
| 2. Are records of past shipments retained for 3 years? | ✓ | | | MANIFEST SYSTEM NOT IN USE FOR 3 YRS. AT THIS TIME |
| (B) Does the owner or operator meet requirements regarding manifest discrepancies? | | N/A | | NO DISCREPANCIES |

*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? | | N/A | | |
| 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 | | N/A | | |
| 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) | | N/A | | |

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

### I
### USE AND MANAGEMENT OF CONTAINERS

Facility Name: _____ Date of Inspection: _____

| | Yes | No | NI* | Remarks |
|---|---|---|---|---|
| 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? (Indicate if waste is ignitable or reactive.) | | | | |

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

J
TANKS

Facility Name: HARTFORD/CLARK OIL Date of Inspection: 7-23-81

| | | | | |
|---|---|---|---|---|
| 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 containement structures? | ✓ | | | |
| 3. Do continuous feed systems have a waste-feed cutoff? | ✓ | | | |
| 4. Are waste analyses done before the tanks are used to store a substantially different waste than before? | | N/A | | SAME WASTE CONTINUALLY STORED IN SAME TANK |
| 5. Are required daily and weekly inspections done? | ✓ | | | |
| 6. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.) | ✓ | | | PROTECTED |
| 7. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR 265.17(b) apply.) | | N/A | | NO INCOMPATIBLE WASTES |

*Not Inspected

| | Yes | No | "I* | Remarks |
|---|---|---|---|---|

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

   Tank capacity: _____ gallons

   Tank diameter: _____ feet

   Distance of tank from property line OVER 50 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: _____ Date of Inspection: _____

| | Yes | No | "I* | 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.) | | | | |
| 7. Are incompatible wastes stored in different impoundments? (If not, the provisions of 40 CFR 265.17(b) apply.) | | | | |

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

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

## IX

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

### 1. MANIFEST REQUIREMENTS

| | Yes | No | NI* | Remarks |
|---|---|---|---|---|
| (A) Does the operator have copies of the manifest available for review? | ✓ | ___ | ___ | _____ |
| (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? | | N/A | | NO EXCEPTIONS AT THIS TIME |

## 2. PRE-TRANSPORT REQUIREMENTS

| | Yes | No | NI* | Remarks |
|---|---|---|---|---|
| (A) Is waste packaged in accordance with DOT Regulations? (Required prior to movement of hazardous waste off-site) | | | ✓ | NO WASTE BEING SHIPPED AT THE TIME OF THE INSPECTION |
| (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? | | | ✓ | |

REMARKS

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

CLARK OIL & REFINING IS A PETROLEUM REFINERY. HAZARDOUS WASTES GENERATED AT THE FACILITY ARE TYPICAL OF MOST OIL REFINERIES AND INCLUDE:

| | |
|---|---|
| K049 | SLOP OIL EMULSION SOLIDS |
| K048 | DAF FLOAT |
| K051 | API SEPERATOR SLUDGE |
| K050 | HEAT EXCHANGE BUNDLE CLEAN. SLUDGE |
| K052 | LEADED TANK BOTTOMS |
| D003 | REACTIVE WASTES |

THESE WASTES ARE STORED/TREATED IN LARGE TANKS. INSPECTIONS ARE CONDUCTED DAILY AND WEEKLY ON THESE TANKS. WASTE IS SHIPPED OFF-SITE UNDER THE MANIFEST SYSTEM BY TANKER TO ILWD IN INDIANA. MANIFESTS WERE CHECKED, BUT PLACARDING, ETC. COULD NOT BE CHECKED AS NOT WASTE WAS BEING LOADED FOR SHIPMENT.

CONTINGENCY PLANS WERE CHECKED UNDER THE AMENDED SPCC PLAN FOR THE SITE. AN EVACUATION PLAN IS AVAILABLE BUT NO SIGNALS WERE LISTED AS TO HOW THE PLAN WOULD FIRST BE IMPLEMENTED. ARRANGEMENTS WITH LOCAL HOSPITALS, FIRE DEPT., AND POLICE HAVE BEEN MADE.

ENVIRONMENTAL PROTECTION AGENCY STATE OF ILLINOIS

L P C F C 0 5 5 C
(1) (8) (9)

**OBSERVATION** REPORT - SITE INVENTORY NO. _ _ _ _ _ _ _
(11) (18)

_____ CO. - L.P.C. Region # _____ Date __/__/__
(20) (25)

_____ / _____ Letter Sent (Yes or No) ___
(Location) (Responsible Party) (26)

Samples Taken: Yes ( ) No ( ) Time: From __ : __ m Weather _____
Ground Water( ) Surface( ) Other( ) To __ : __ m
Photos Taken: Yes ( ) No ( ) Interviewed _____ Inspector ___ ___
(27) (29)

Previous Inspection _____ Previous Correspondence _____ Site Open: Yes( ) No( )

| OPERATIONAL STATUS: | | TYPE OF OPERATION: | | | | AUTHORIZATION: | |
|---|---|---|---|---|---|---|---|
| Operating | ( ) | Landfill | ( ) | Storage | ( ) | E.P.A. Permit | ( ) |
| Temporarily Closed | ( ) | Random Dump | ( ) | Salvage | ( ) | Variance | ( ) |
| Closed Not Covered | ( ) | Other _____ | ( ) | A.C.D. | ( ) | 21(e) | ( ) |
| Closed and Covered | ( ) | Quantity Received Daily(1-6) | | _____ (30) | | Board Order | ( ) |
| | | | | | | Illegal (5) | ( ) ___ (31) |

IMPROVED

SAME

DETERIORATED

RECEIVED
JUL 27 1981
E.P.A. — D.L.P.C.
STATE OF ILLINOIS

LPC 4 1/79 5,000

I S or D ___ (62)

GENERAL REMARKS: _____

INTERVIEW: _____

DIAGRAM:

MADISON COUNTY
HARTFORD/CLARK OIL & REFINING
ILD041889023/11905002

Complete inspection report includes pages 1-11, 19, 20, and 24.