ID 0961
5a
12/83

Regional Response Team

Region 10 Oil and Hazardous Substances Pollution Contingency Plan

RRT

Environmental Protection Agency
United States Coast Guard
Department of Commerce
Department of Interior
Department of Agriculture
Department of Defense
Department of State
Department of Justice
Department of Transportation
Department of Health Education and Welfare
Department of Housing and Urban Development
Department of Energy
States of: Alaska Idaho Oregon Washington

Co-Chair
Region X
Regional Response Team

Team Members:

Enclosed is the final On Scene Coordinator's Report for the immediate removal action at the Arrcom Corporation facility in Rathdrum, Idaho.

A federal response was initiated on 18 September after it was determined that no responsible party would perform the site cleanup. A total of approximately $70,000 in CERCLA funds were expended during cleanup operations which were completed on 21 September 1983. The 150 gallons of PCB contaminated material (and rinsate) found onsite was shipped to Arkansas for incineration, 9,700 gallons of hazardous materials were shipped to Washington for possible recycling, and 137 cubic yards of contaminated soil were shipped to a disposal site in Idaho.

Should you have any questions, please call me at (206) 442-1263.

Sincerely,

for

James C. Willmann
Chief, Environmental Emergency Team

cc: NRT
USCG Pacific Strike Team
EPA Regional Administrator
Henry Van Cleve, EPA Headquarters
Idaho Department of Health and Welfare
EPA Idaho Operations Office

USEPA RCRA
3009355

Report Oil and Chemical Spills Toll Free (800) 424-8802

FEDERAL
ON SCENE COORDINATOR'S REPORT

HAZARDOUS WASTE SITE CLEANUP
ARRCOM CORPORATION
RATHDRUM, ID
SEPTEMBER 17-23, 1983

Prepared by
Region X Technical Assistance Team

Approved by
Carl Kitz, OSC

Environmental Protection Agency
Emergency Response Section
Region X
Seattle, Washington

DECEMBER 1983

SUMMARY

Arrcom Corporation (Drexler Enterprises, Inc.), located in Rathdrum, Idaho in a rural residential area, formerly engaged in recycling waste oil containing a variety of solvents. The facility was abandoned in January 1982. Preliminary site investigations by Region X personnel identified that a variety of hazardous materials were present (including PBCs) and that a number of tanks had leaked or were leaking. Evidence of soil contamination resulted from chemical analyses on soil samples taken at the site. Because the site overlies the Spokane Valley/ Rathdrum Prairie Aquifer and because of the known effects of some of the chemicals present onsite, the possibility of groundwater contamination, the abandoned nature of the site, and the deteriorated condition of a number of tanks, the site was declared an immediate threat to the public health and welfare.

Once it was determined that no responsible party would perform the required cleanup, EPA obtained consent to access the site. A federal immediate removal action was declared by Ernesta Barnes, Regional Administrator, EPA Region X, on 31 August 1983. The response action involved the EPA Regional office, U.S. Coast Guard Pacific Strike Team, Region X Technical Assistance Team, and the selected cleanup contractor, Crosby and Overton, Inc.

Cleanup operations commenced on 18 September and were completed on 21 September 1983. The tank containing PCB contaminated material (T-5) was pumped empty and rinsed with kerosine four times. The 23 other bulk storage tanks and 3 tank trucks were also emptied into vacuum trucks and tank trucks. Soil removal areas were identified and 137 cubic yards of contaminated soil were removed.

Three drums containing 150 gallons of PCB contaminated material and kerosine rinsate were shipped to Eldorado, Arkansas for incineration. The 9,700 gallons of hazardous materials from the storage tanks and onsite tank trucks were shipped to Kent, Washington for possible recycling. The soil removed was disposed of at an approved hazardous waste site in Grand View, Idaho. Small containers

were left on site in a storage shed, while unpumpable sludges were left in the storage tanks.

The total cost of the 4-day cleanup operation was approximately $70,000. This includes contractor cleanup costs, and EPA and U.S. Coast Guard transportation and other recoverable expenses.

INTRODUCTION

The Arrcom Corporation (Drexler Enterprises, Inc.) site was placed on the EPA proposed National Priorities List of sites targeted for Superfund cleanups in December 1982. The former waste oil recycling facility in Rathdrum, Idaho, had been abandoned in January 1982 and materials were known to still be present in bulk storage tanks and tank trucks onsite. The 1.2 acre site (Figure 1) overlies the Spokane Valley/Rathdrum Prairie Aquifer which is a designated sole source aquifer providing drinking water for approximately 350,000 people. The total population served by the aquifer within a three mile radius of the site is estimated to be 6,300. The Arrcom Corporation facility is in an area which is predominantly agricultural and rural residential. The site is located immediately adjacent to Highway 53, and there is no fencing or any other means of securing the site against tampering. A residence is located immediately adjacent to the north side of the site. This residence and most others in the area depend on domestic wells for drinking water.

Samples taken during a preliminary field investigation conducted on 6-8 June 1983 were analyzed and indicated the presence of PCBs, toluene, methylene chloride, tetrachloroethylene, ethyl benzene, xylene, and acetone. The site investigation itself revealed that a variety of materials were present in the 24 bulk storage tanks and 3 tank trucks onsite, and that leakage was occurring in some instances. There was also visual evidence of soil contamination which was confirmed bysample analyses.

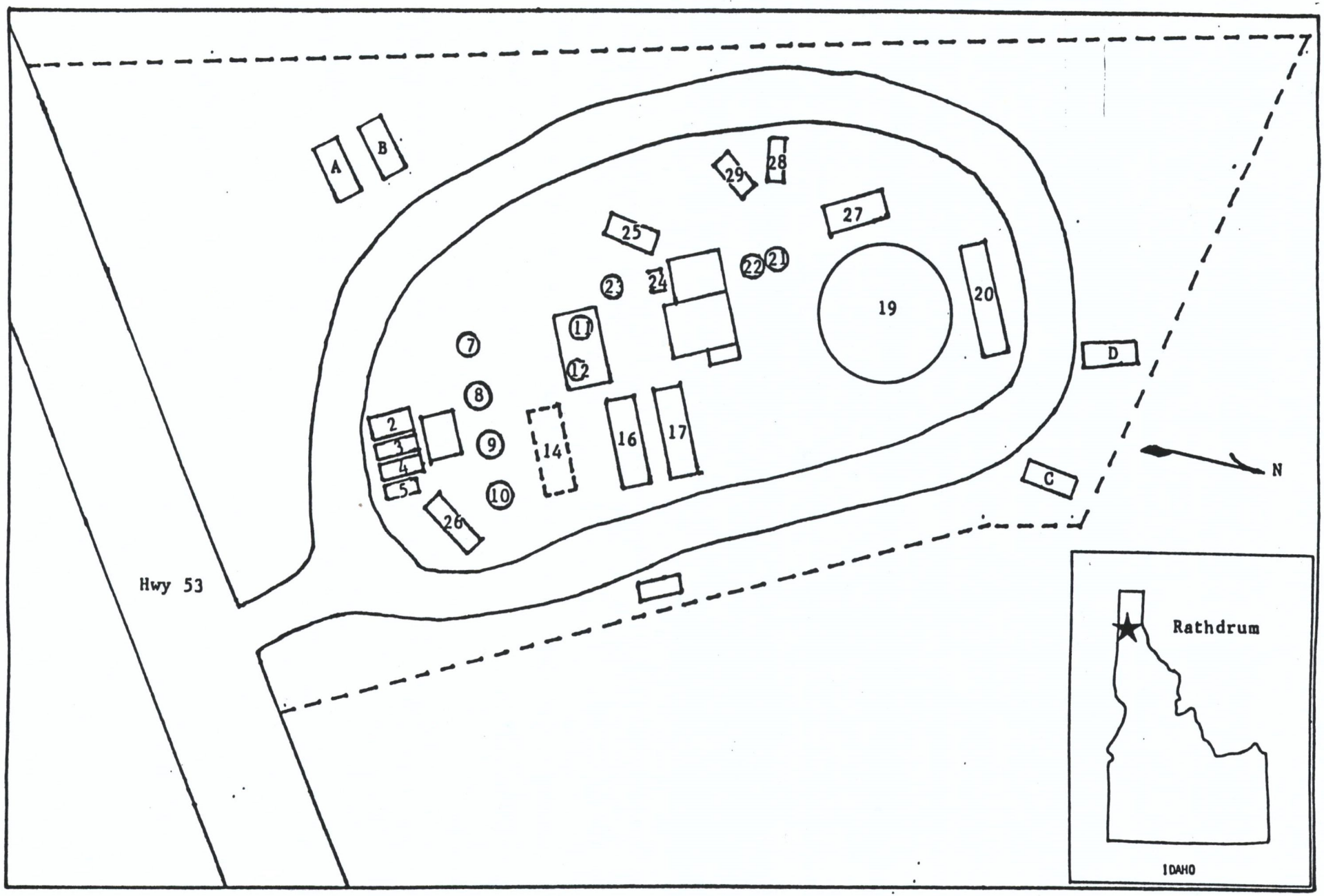

Figure 1
Arrcom Corporation Hazardous Waste Site, Rathdrum, Idaho

Because the site was abandoned and easily accessible to the public, overlies the Spokane Valley/Rathdrum Prairie Aquifer, contained storage tanks in a leaking and deteriorated condition, and because of the known effects of some of the chemicals present, the site was declared an immediate threat to the public health and welfare. Inquiries were made by the EPA legal staff concerning possible owner-sponsored cleanup action. Once it was determined that none of the responsible parties would initiate the required cleanup, EPA lawyers obtained consent to access the site. A federal immediate removal action was declared on 31 August 1983 by Ernesta Barnes, EPA Region X Regional Administrator. Carl Kitz, of the EPA Region X Emergency Response Team, was designated On Scene Coordinator (OSC). The Region X Technical Assistance Team (TAT) and the U.S. Coast Guard Pacific Strike Team were alerted and were requested to travel to the Rathdrum, Idaho site on 17 September 1983. Cleanup contractor's capabilities were reviewed and a contractor was selected.

A meeting was held on 16 September between C. Kitz and Larry Boyle of the selected cleanup contractor, Crosby and Overton, Inc. The basic objectives of the proposed Arrcom Corporation site cleanup were outlined and utilized in the preparation of the emergency contract with Crosby and Overton (Attachment A). The initially identified objectives were:

1) Drain aboveground storage tanks (and tank trucks) and dispose or recycle the wastes at an approved facility.
2) Drain and rinse tanks(s) identified as containing PCBs and dispose of material in accordance with TSCA and DOT shipping regulations.
3) Excavate and dispose of highly contaminated soil.
4) Provide security guard during time when cleanup crews are not onsite.
5) Assist or conduct sampling and laboratory services as requested.
6) Perform all cleanup work in accordance with federal and state safety regulations and the site safety plan.

The cleanup was to be started using the initial $50,000 authorized by the Regional Administrator. The 10-point document was prepared by TAT and sent to EPA Headquarters by C. Kitz on 1 September (Attachment B). When it became evident that additional funds (over the initial $50,000) would be necessary to complete the cleanup, C. Kitz called Alan Humphreys at EPA Headquarters on 21 September to confirm an increase in the funding level to the $96,000 requested in the 10-point document.

A meeting was held in Coeur D'Alene, Idaho (near Rathdrum) on the morning of 18 September 1983 prior to the onset of cleanup activities. This initial coordination meeting delineated the overall cleanup approach to be taken at the site and identified the objectives to be accomplished that day. The meeting was attended by C. Kitz (OSC), Lt. Jack Kemerer (U.S. Coast Guard, Pacific Strike Team), Thomas Johnson (Region X Technical Assistance Team), and L. Boyle and Harry Garonzik (Crosby and Overton, Inc.). The U.S. Coast Guard personnel were assigned the responsibility of site safety during the cleanup operation, implementing the site safety plan prepared by TAT. T. Johnson was requested to assist the OSC and U.S. Coast Guard personnel with technical aspects of the cleanup action and with site safety.

After arriving on the site on 18 September, all personnel (OSC, 4 U.S. Coast Guard, 1 TAT, and 4 Crosby and Overton) were briefed on the cleanup objectives and procedures, site safety, emergency signals and evacuation plans, levels of respiratory and personal protection, decontamination procedures, restrictions on site entry, and chain-of-command. Cleanup operations commenced thereafter and continued through 21 September, focusing on removing liquids from tanks and excavating contaminated soil. Robert Jacobson (EPA Region X) arrived onsite on 19 September to release a press announcement concerning the site activities and to meet with newspaper and TV reporters visiting the site.

MAJOR SITE ACTIVITIES

The major activities during the immediate removal at the Arrcom Corporation site included: removal of PCB contaminated material, pumping storage tanks empty and disposal of their contents, and removal of contaminated soil.

Removal of PCBs

Chemical analyses of tank samples taken during the preliminary site survey performed on 6-8 June 1983 revealed PCB concentrations of 1250 ppm in T-5. Cleanup efforts on 18 September focused on draining the contents of T-5 into 55-gallon drums. Once the tank was emptied of liquid, a compressor was connected to a drum of kerosine (brought to the site for this purpose) and the tank was rinsed twice with a hose inserted through the top tank opening. This served to satisfy regulatory requirements and to break up sludge in the bottom of the tank. Other containers near T-5, particularly a bucket sitting under the tank valve, were also emptied into the 55-gallon drums, in case they were PCB contaminated. All workers involved in this activity were in Level C respiratory protection (full face cartridge respirators) and Level B personal protection (PVC acid suits, hard hat, inner and outer gloves, and steel-toed neoprene boots).

The tank was rinsed a third time and the kerosine rinsate was collected in a 55-gallon drum. Samples of the rinsate from T-5, soil near T-5, and from a drum near T-5 were taken and analyzed with a PCB field test kit. The kerosine rinsate sample still contained between 200 and 300 ppm of PCB. It also appeared that the soil in front of T-5 was PCB contaminated, although variations in the field test readings indicated possible interference. The tank was rinsed a fourth time and a sample was taken. It was found to be relatively free of PCB contamination (less than 10 ppm). A total of 150 gallons of PCB contaminated material was emptied into three 55-gallon drums for disposal. On 20 September, the three drums were shipped on a flatbed truck to Eldorado, Arkansas for

incineration at the ENSCO facility.

Disposal of Storage Tank Contents

On 18 September a preliminary survey was taken of all bulk storage tanks and tank trucks on the site. Soundings were made in most tanks to determine the quantity of materials to be removed. Inaccessibility prevented sounding all 21 bulk tanks and 3 tank trucks. Based on this initial survey it was thought that T-19 held approximately 8,000 gallons, T-7 held about 4,000 gallons, and the remainder of the sounded tanks held a total of approximately 2,000 gallons. Three untested tanks (T-8, T-9, and T-10) were thought to contain a maximum of 10,000 gallons.

Three vacuum trucks were brought to the site to pump materials from the tanks. They in turn would pump into four tank trucks which would haul the liquids away. Pumping began on 19 September and was completed on the same day due to the low volume of material to be pumped and the expeditious pumping operations.

During pumping operations, cleanup personnel handling transfer hoses were in Level B respiratory (self contained breathing apparatus) and personal protection (the same as described for the removal of PCBs). The remaining personnel involved in the pumping operation were in Level C respiratory protection and Level B personal protection, as were the U.S. Coast Guard safety monitors. Ambient air monitoring performed each day indicated no organic vapor hazard onsite, except for the possibility from a hose rupture or valve failure during pumping operations.

Two tank trucks were sent away empty when it became apparent that they were not needed. Two other Matlack tank trucks received the storage tank and tank truck contents from the vacuum trucks and departed for the Crosby and Overton recycling facility in Kent, Washington on 19 September. One truck carried 4,800

gallons and one held 3,000 gallons.

All storage tanks and tank trucks were pumped a second time on the afternoon of 19 September to remove any sludge which had liquefied in the warming air temperatures. On the morning of 20 September, two vacuum trucks left for the Kent facility carrying a combined total of 1,200 gallons. The third vacuum truck remained onsite to pump all of the storage tanks and tanks trucks for a final time. The last vacuum truck left the site for Kent with 700 gallons on 21 September. A total of approximately 9,700 gallons were shipped from the cleanup site for possible recycling at the Crosby and Overton Kent, Washington facility.

Soil Removal

On 19 September, a brief site survey was performed to discuss soil excavation plans and to identify soil removal areas. A backhoe and front loader began soil removal and loading dump trucks on 20 September. Excavated soil was piled in three locations to aid efficient loading of dump trucks. Soil from near T-5, which may have had low levels of PCB contamination, was placed in a pile on plastic sheets. All three piles of contaminated soil were sampled to allow later analysis if necessary to ensure that the soil was accepted at the disposal site. The dump trucks were lined with plastic prior to being loaded. Once filled, the plastic was folded over the top and weighted with rocks and chunks of concrete. Trucks which had tarpaulins were also covered with the tarps to further prevent soil from blowing off the trucks.

Equipment operators were in Level C personal protection (tyvek coveralls, gloves, hard hat, and steel-toed boots) and utilized Level C respiratory protection (half face cartridge respirators) when handling soil from near T-5 and in areas where high HNU photoionizer readings were obtained. Cleanup personnel in the excavation areas were in Level C personal protection and utilized full face cartridge respirators when near areas of high HNU readings. U.S. Coast Guard personnel in Level C respiratory protection and Level B personal pro-

tection served as safety monitors and performed ambient air monitoring in excavated areas.

Several complications arose during soil removal operations. Both the backhoe and front loader got flat tires. Soft ground in the excavation area near T-19 caused the backhoe to become mired at times, slowing operations down slightly. Soil removal on the northeast side of T-19 resulted in a pit 8 to 10 feet deep next to a power pole. The local power company was contacted, arrived onsite and cut power to the pole, and dropped the pole. Further excavation could then be completed to remove additional soil causing high HNU readings. Some scheduling problems also arose: some trucks arrived hours late, additional trucks were needed since initial soil excavation estimates were exceeded quickly, and one truck became inoperable due to an accident on the way to the site. There were also complications caused by overloading the trucks. The last truck to receive contaminated soil returned to the site because it was overloaded by 10,000 pounds. It had to be partially unloaded, a backhoe and additional truck had to be located, and the new truck had to be loaded.

Soil excavation areas are indicated on Figure 2. In two areas (near T-11 and on the northeast side of T-19), soil was removed to a depth of 8 to 10 feet because of high HNU readings. A total of eight trucks were loaded with an estimated 137 cubic yards of contaminated soil. These trucks left the site on 20 September for the authorized disposal site in Grand View, Idaho. The two pit areas created by soil excavation were filled in with materials found onsite and all soil removal areas were leveled in an attempt to tidy up the site.

FINAL SITE DISPOSITION

The immediate removal action at the Arrcom Corporation site was considered to be completed on 21 September 1983 once all bulk storage tanks and tank trucks had been emptied and contaminated soil had been removed. Completion of these

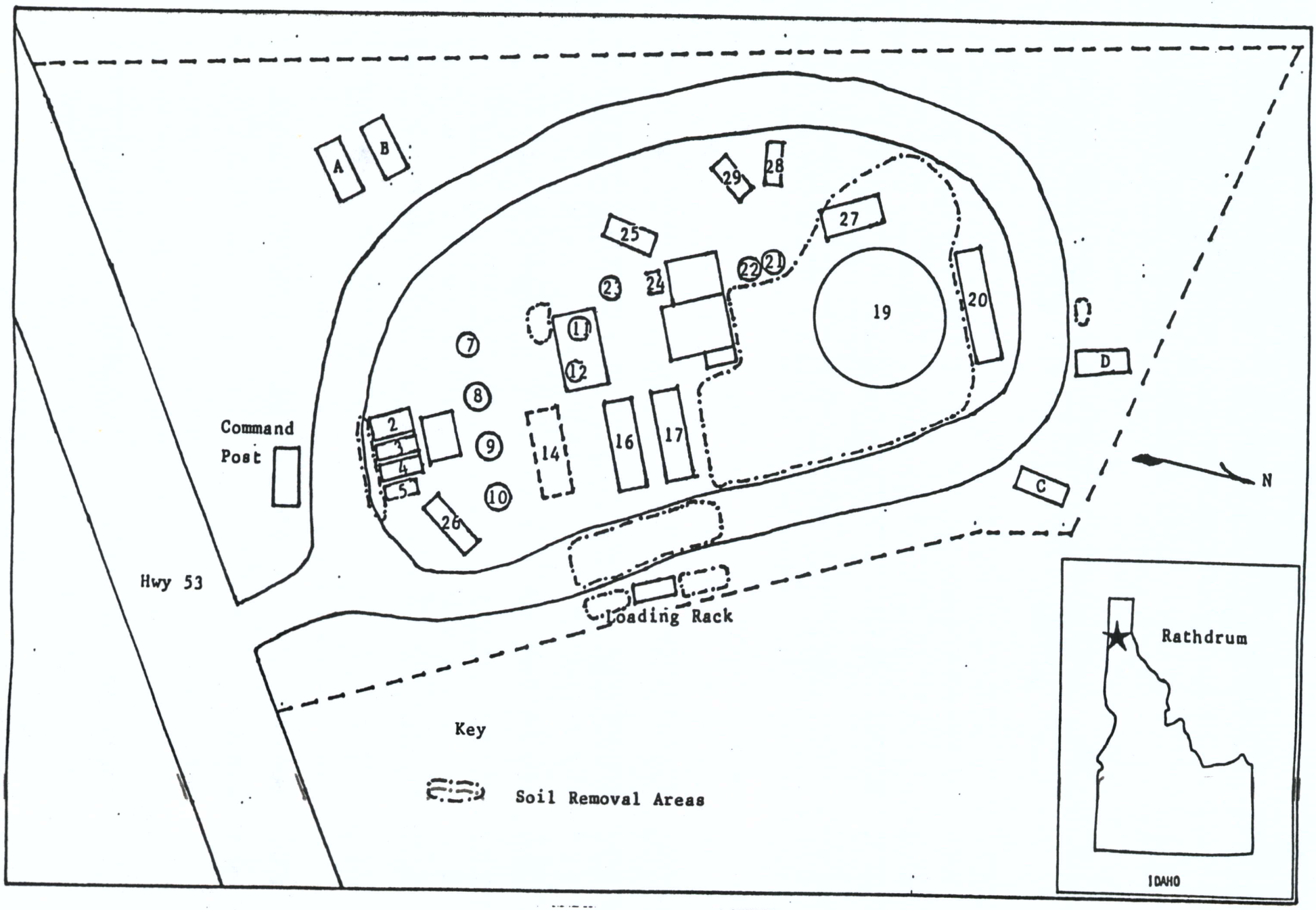

Figure 2

Contaminated Soil Removal Areas,
Arrcom Corporation, Rathdrum, Idaho

tasks resulted in:

1) Shipment of 150 gallons in three 55-gallon drums of PCB-contaminated material from T-5 and the kerosine rinsate to the ENSCO facility at Eldorado, Arkansas for for incineration.

2) Shipment of 9,700 gallons of hazardous materials to the Crosby and Overton chemical reclaiming facility at Kent, Washington for possible recycling.

3) Shipment of 137 cubic yards of contaminated soil from near the loading rack, T-19, T-23, T-24, and T-5 to the Envirosafe Services of Idaho facility at Grand View, Idaho for disposal.

All contaminated disposable clothing and cleanup materials were removed from the site. Unpumpable sludges were left in the bottom of several tanks. Valve handles from tanks were removed and locked up, and most tank outlet fittings were plugged and sealed. All remaining containers, including buckets and a few unpumpable drums, were collected for storage in a locked shed onsite. A backhoe and front loader were used to fill in the two deep pits where soil was removed and to level other soil removal areas. A final meeting was held with the Rathdrum police chief, to briefly outline the situation at the Arrcom facility and to thank him for his assistance.

ATTACHMENT A

SITE PHOTOGRAPHS

PHOTO DESCRIPTIONS

1. Storage tanks at Arrcom Corporation abandoned site in Rathdrum, Idaho.
2. C. Kitz, OSC, observing site cleanup.
3. Lt. J. Kemerer (USCG Pacific Strike Team) and L. Boyle (Crosby and Overton, Inc.) discussing site activities.
4. Command post and other support vehicles.
5. Draining PCB-contaminated liquids in T-5 and nearby containers.
6. Compressor used to pump kerosine to rinse T-5.
7. Drums containing PCB liquids and rinsate labelled for shipment.
8. Backhoe rigged with chains to lift drums onto flatbed truck.
9. Level B respiratory protection used by hose handlers in case of hose rupture during tank pumping.
10. Vacuum trucks pumped material from tanks and later into tank trucks.
11. Survey of tanks after pumping off of contents.
12. Decontamination area.
13. Contaminated soil near T-5.
14. Backhoe removing soil near T-5.
15. Contaminated soil from T-5 staged on plastic prior to loading it into trucks.
16. Soil removal near the site loading rack.
17. Flat tire problems with backhoe and front loader.
18. Excavation of soil near T-19.
19. Monitoring of organic vapors in excavated area.
20. Loading of contaminated soil into plastic-lined trucks.

DOCUMENTARY EXHIBIT INDEX
X83-04-02-3008
RATHDRUM, IDAHO

Exhibit

1. Two-page document, EPA Form 8700-12, Notification of Hazardous Waste Activity, signed by Thomas A. Drexler, dated September 14, 1980.

2. One-page document, EPA Form 8700-12B, Acknowledgement of Notification of Hazardous Waste Activity, from EPA to Drexler Enterprises, dated October 29, 1980.

3. Fifteen pages, EPA Form 3510-1, General Information Consolidated Permit Program, submitted for ARRCOM, Inc., signed by W. A. Pickett on November 17, 1980, also EPA Form 3510-1, General Information Consolidated Permit Program for Drexler Enterprises, Inc., signed by W. A. Pickett on November 17, 1980.

4. Letter from Wally Drexler to Linda Dawson dated February 3, 1981.

5. One-page letter from James Ivers from ARRCOM, Inc. to Linda Dawson dated February 5, 1981.

6. One-page telephone call report from Linda Dawson to James Ivers of ARRCOM Oil dated August 4, 1981.

7. One-page letter from Tobias Hegdahl to Wally Drexler dated August 13, 1981.

8. One-page telephone use report call from Al Pickett to Linda Dawson dated December 3, 1981.

9. Call from Linda Dawson to Wally Drexler dated December 3, 1981.

10. Two-page letter from Linda Dawson to Alan Pickett dated December 4, 1981.

11. Two-page letter from Linda Dawson to Alan Pickett, ARRCOM, Inc., January 11, 1982.

12. Record of phone call from Linda Dawson to Al Pickett, ARRCOM, Inc. dated February 5, 1982.

13. Two-page letter from Ken Feigner to Alan Pickett, ARRCOM, Inc., dated February 9, 1982.

14. Record of telephone call from Linda Dawson to David Drexler dated March 4, 1982.

15. Record of telephone communication from Linda Dawson to Al Pickett, ARRCOM, Inc., March 5, 1982.

15. Record of telephone communication from Linda Dawson to Al Pickett, ARRCOM, Inc., March 5, 1982.

16. Record of field trip for site inspection dated June 9, 1982 and June 22, 1982 from Mike Brown to Betty Wiese.

17. Record of conference between Mike Brown, George Hofer and Warren Bingham dated June 22, 1982.

18. Handwritten letter from Warren Bingham to George Hofer dated July 1, 1982.

19. Five-page trip report dated July 20, 1982 from Mike Brown.

20. Fourteen-page trip report from Mike Brown, date of inspection July 20, 1982 at Rathdrum, Idaho.

21. Nine pages of collection reports identifying five samples taken by Athena Lalikos at the Rathdrum site in Idaho on July 20, 1982.

22. Fifteen pages of analytical results indicating the results of samples taken by Athena Lalikos at the Rathdrum site on July 20, 1982.

23. One-page document representing Chain of Custody Record of samples taken by Athena K. Lalikos at the Rathdrum site on July 20, 1982.

24. One-page document entitled "Field Sample Data Sheet."

25. Four pages containing letters from James Harris to Michael Brown which encloses a hazardous waste manifest for a waste shipment from Anaconda Aluminum to ARRCOM Oil in Rathdrum, Idaho.

26. One-page letter from John Hamill to George Drexler dated December 27, 1982.

27. One-page letter from L. Edwin Coate to George W. Drexler transmitting Complaint and Compliance Order; page 2 of that exhibit shows the certified return receipt signed an employee of George Drexler; page 3 of exhibit 27 shows the Affidavit of Service upon George Drexler at the Federal Penitentiary at Fort Worth.

28. Two-page document from L. Edwin Coate to ARRCOM, Inc., which is the transmittal letter to the Complaint and Compliance Order; the second page shows the certified return indicating receipt by ARRCOM, Inc.

29. Two-page document from L. Edwin Coate to Mr. Warren Bingham which is the transmittal letter to the Complaint and Compliance Order; page two of this document shows the receipt for certified mail signed by Mr. Bingham.

30. Two-page document dated April 27, 1983, letter from L. Edwin Coate to W. A. Pickett transmitting the Complaint and Compliance Order; page two of Exhibit 30 is a signed and notarized Affidavit of Personal Service upon Mr. Pickett.

31. Dated April 27, 1983, letter from L. Edwin Coate to Mr. Thomas Drexler transmitting the Complaint and Compliance Order; page two of Exhibit 31 is a signed and notarized Affidavit of Service showing personal service upon the wife of Thomas Drexler.

32. Twelve page Complaint and Compliance Order sent to all Respondents in this proceeding.

33. This is a one-page penalty calculation work sheet used by Michael Brown to calculate the proposed penalty.

34. Two-page letter from Mr. Warren Bingham to L. Edwin Coate dated May 14, 1983.

35. Record of a conference between Michael Brown, George Hofer, Ken Feigner, Lanita Bingham, Warren Bingham and Mike Garcia dated May 26, 1983.

36. Letter from Warren Bingham to Ken Feigner dated May 27, 1983 - one page.

37. One-page letter from W. A. Pickett to EPA dated June 27, 1983.

38. Four-page letter from Thomas A. Drexler to George Hofer, EPA, dated June 27, 1983.

39. One-page letter, W. A. Pickett to Ken Feigner dated June 27, 1983.

40. Twenty pages of documents sent by W. Donald Lilly from United Coatings indicating chemical transportation manifests showing shipments of hazardous waste to the ARRCOM facility at Rathdrum on at least nine occasions.

41. One-page summary of the chemical analyses performed at the ARRCOM Rathdrum site with attached map showing where sample locations were. (This is actually a 3-page document.)

42. One-page revised penalty calculation work sheet used by Michael Brown to calculated the proposed penalty.

Please print or type with ELITE type *(12 characters/inch)* in the unshaded areas only.

Form Approved OMB No. 158-S79016
GSA No. 0246-EPA-OT

EPA

U.S. ENVIRONMENTAL PROTECTION AGENCY

NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

INSTALLATION'S EPA I.D. NO.	
I. NAME OF INSTALLATION	DREXLER Enterprises Inc
II. INSTALLATION MAILING ADDRESS	RT. 3 Box 258-A6 Rathdrum Idaho 83858
III. LOCATION OF INSTALLATION	~~[illegible]~~ Rathdrum Idaho Rt 3 Box 258-A6 83858

PLEASE PLACE LABEL IN THIS SPACE

INSTRUCTIONS: If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law *(Section 3010 of the Resource Conservation and Recovery Act).*

DETACH

FOR OFFICIAL USE ONLY

COMMENTS: C

INSTALLATION'S EPA I.D. NUMBER	APPROVED	DATE RECEIVED (yr., mo., & day)
F (T/A C 1)		800820

AUG 20 80 00026

I. NAME OF INSTALLATION

DREXLER ENTERPRISE INC.

II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX: 3 RT 3 BOX 258-A6

CITY OR TOWN	ST.	ZIP CODE
4 RAThdRum	ID	83858

III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER: 5 ~~[illegible]~~ - ~~RT 3 Box 258-A6~~

same

CITY OR TOWN	ST.	ZIP CODE
6 W ~~[illegible]~~ ~~RAThdRum ID~~	ID	83858

IV. INSTALLATION CONTACT

NAME AND TITLE *(last, first, & job title)*	PHONE NO. *(area code & no.)*
2 THOMAS A. DREXLER VICE PRES	208-687-0607

V. OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER: 8 GEO. W. DREXLER

DETACH

B. TYPE OF OWNERSHIP *(enter the appropriate letter into box)*

F = FEDERAL
M = NON-FEDERAL

M

VI. TYPE OF HAZARDOUS WASTE ACTIVITY *(enter "X" in the appropriate box(es))*

- [X] A. GENERATION
- [X] B. TRANSPORTATION *(complete item VII)*
- [X] C. TREAT/STORE/DISPOSE
- [ ] D. UNDERGROUND INJECTION

VII. MODE OF TRANSPORTATION *(transporters only – enter "X" in the appropriate box(es))*

- [ ] A. AIR
- [ ] B. RAIL
- [X] C. HIGHWAY
- [ ] D. WATER
- [ ] E. OTHER *(specify)*:

VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your Installation's EPA I.D. Number in the space provided below.

- [X] A. FIRST NOTIFICATION
- [ ] B. SUBSEQUENT NOTIFICATION *(complete item C)*

C. INSTALLATION'S EPA I.D. NO.

IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.

EPA EXHIBIT 1
IDAHO

EPA Form 8700-12 (6-80)

CONTINUE ON REVERSE

I.D. – FOR OFFICIAL USE ONLY

S W

IX. DESCRIPTION OF HAZARDOUS WASTES *(continued from front)*

A. HAZARDOUS WASTES FROM NON–SPECIFIC SOURCES. Enter the four–digit number from 40 CFR Part 261.31 for each listed hazardous waste from non–specific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
K049					
7	8	9	10	11	12

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four–digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
19	20	21	22	23	24
25	26	27	28	29	30

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four–digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
37	38	39	40	41	42
43	44	45	46	47	48

D. LISTED INFECTIOUS WASTES. Enter the four–digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54
~~K049~~					

E. CHARACTERISTICS OF NON–LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non–listed hazardous wastes your installation handles. *(See 40 CFR Parts 261.21 – 261.24.)*

- [x] 1. IGNITABLE (D001)
- [ ] 2. CORROSIVE (D002)
- [ ] 3. REACTIVE (D003)
- [ ] 4. TOXIC (D000)

X. CERTIFICATION

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

SIGNATURE	NAME & OFFICIAL TITLE *(type or print)*	DATE SIGNED
Thomas A. Drexler	Thomas A. Drexler Vice Pres	9-14-80

EPA

ACKNOWLEDGEMENT OF NOTIFICATION OF HAZARDOUS WASTE ACTIVITY
(VERIFICATION)

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act *(RCRA)*. Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER ➤ IDD000800961

DREXLER ENTERPRISES INC
TR 3 BOX 258-A6
RATHDRUM ID 83858

INSTALLATION ADDRESS ➤ TR 3 BOX 258-A6
RATHDRUM ID 83858

EPA Form 8700-12B (4-80) 10/29/80

EPA EXHIBIT 2
IDAHO

Please print or type in the unshaded areas only (fill-in area is spaced for elite type, i.e., 12 characters/inch).

Form Approved OMB No. 158-R0175

FORM 1 GENERAL

EPA

U.S. ENVIRONMENTAL PROTECTION AGENCY

GENERAL INFORMATION

Consolidated Permits Program

(Read the "General Instructions" before starting.)

I. EPA I.D. NUMBER

F I D D 0 0 0 8 0 0 9 6 1 | T/A | C D

GENERAL INSTRUCTIONS

If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent *(the area to the left of the label space lists the information that should appear)*, please provide it in the proper fill-in area(s) below. If the label is complete and correct, you need not complete Items I, III, V, and VI *(except VI-B which must be completed regardless)*. Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.

LABEL ITEMS

I. EPA I.D. NUMBER

III. FACILITY NAME

V. FACILITY MAILING ADDRESS

VI. FACILITY LOCATION

RECEIVED JAN 6 1982 - Revision

PLEASE PLACE LABEL IN THIS SPACE

PROGRAM DEVELOPMENT SECTION

II. POLLUTANT CHARACTERISTICS

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms.

SPECIFIC QUESTIONS	MARK 'X' YES	NO	FORM ATTACHED
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)		X	
B. Does or will this facility *(either existing or proposed)* include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)		X	
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)		X	
D. Is this a proposed facility *(other than those described in A or B above)* which will result in a discharge to waters of the U.S.? (FORM 2D)		X	
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)	X		
F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X	
H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	
J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	

III. NAME OF FACILITY

1 SKIP ~~DREXLER ENTERPRISES INC~~ ARRCOM INC

IV. FACILITY CONTACT

A. NAME & TITLE *(last, first, & title)*: 2 PICKETT ALAN SECRETARY

B. PHONE *(area code & no.)*: 509 624 7719

2/5/82 # disconnected

V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX: 3 PO BOX 125

B. CITY OR TOWN: 4 OTIS ORCHARDS

C. STATE: WA

D. ZIP CODE: 99027

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER: 5 MI E STATE LINE HWY 53

B. COUNTY NAME: KOOTENAI

C. CITY OR TOWN: 6 RATHDRUM

D. STATE: ID

E. ZIP CODE: 83858

F. COUNTY CODE *(if known)*: 055

EPA EXHIB 3 - IDAHO

CONTINUE ON REVER

EPA Form 3510-1 (6-80)

REVISED

1. Water well
2. T-48 2,000 Gal. Re-refined oil
3. T-23 1,000 Gal. Re-refined oil
4. T-24 1,000 Gal. Re-refined oil
5. T-11 550 Gal. Re-refined oil
6. Electrical storage
7. T-47 2,000 Gal. Water separator
8. T-145 6,000 Gal. Finished oil storage
9. T-120 5,000 Gal. Finished oil storage
10. T-119 5,000 Gal. Finished oil storage
11. T-28 1,200 Gal. Electric heater tank
12. 48" shaker
13. Shaker building
14. T-144 6,000 Gal. Underground finished oil
15. Boiler room with work shop
16. T-142 6,000 Gal. Heater tank with coils
17. T-143 6,000 Gal. Heater tank with coils
18. Truck loading rack
19. T-1071 45,000 Gal. Waste oil storage
20. T-238 10,000 Gal. Waste oil storage
21. U-1 1,200 Gal. Treatment tanks
22. U-2 1,200 Gal. Treatment tanks
23. T-71 3,000 Gal. Fuel storage

Continued from the front.

III. PROCESSES *(continued)*

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES *(code "T04")* FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

IV. DESCRIPTION OF HAZARDOUS WASTES

A. EPA HAZARDOUS WASTE NUMBER — Enter the four—digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four—digit number*(s)* from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. ESTIMATED ANNUAL QUANTITY — For each **listed waste** entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each **characteristic** or **toxic contaminant** entered in column A estimate the total annual quantity of all the non—listed waste*(s)* that will be handled which possess that characteristic or contaminant.

C. UNIT OF MEASURE — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:
   For listed hazardous waste: For each **listed** hazardous waste entered in column A select the code*(s)* from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.
   For non—listed hazardous waste: For each characteristic or toxic contaminant entered in column A, select the code*(s)* from the list of process codes contained in Item III to indicate **all** the processes that will be used to store, treat, and/or dispose of all the non—listed hazardous wastes that possess that characteristic or toxic contaminant.
   Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code*(s)*.

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B,C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV *(shown in line numbers X-1, X-2, X-3, and X-4 below)* — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non—listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARD. WASTE NO. *(enter code)*	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE *(enter code)*	D. PROCESSES 1. PROCESS CODES *(enter)*	D. PROCESSES 2. PROCESS DESCRIPTION *(if a code is not entered in D(1))*
X-1	K054	900	P	T03 D80	
X-2	D002	400	P	T03 D80	
X-3	D001	100	P	T03 D80	
X-4	D002				*included with above*

Continued from page 2.
NOTE: Photocopy this page before completing if you have more than 26 wastes to list.

Form Approved OMB No. 158-S80004

EPA I.D. NUMBER (enter from page 1)	FOR OFFICIAL USE ONLY	
I D D 0 0 0 8 0 0 9 6 1	DUP	2 DUP

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
1	D001	1,250,000 5000	G	S02	
2			~~B~~	~~S02~~	
3	F003	20,000 80	G	S02	
4	F005	5,000 20	G	S02	
5	F005	5 1.75	Y	S03	Residue (sand, metals, sludge, paint) filter from all products
6					
7					
8					
9					
10					
11					
12					
13					
14					
15					
16					
17					
18					
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22					
23					
24					
25					
26					

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IV. DESCRIPTION OF HAZARDOUS WASTE (Continued)

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE

EPA I.D. NO. (enter from page 1)

F 1 D D 0 0 0 8 0 0 9 6 1

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility *(see instructions for more detail)*.

VI. PHOTOGRAPHS

All existing facilities must include photographs *(aerial, or ground—level)* that clearly delineate all existing structures; existing storage, treatment and disposal areas, and sites of future storage, treatment or disposal areas *(see instructions for more detail)*.

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE *(degrees, minutes, & seconds)*	LONGITUDE *(degrees, minutes, & seconds)*
4 7 4 8 0 1 2	1 1 6 4 8 0 0 0

VIII. FACILITY OWNER

☐ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER	2. PHONE NO. *(area code & no.)*
E DREXLER ENTERPRIZES INC.	5 0 9 - 6 2 4 - 7 7 1 9

3. STREET OR P.O. BOX	4. CITY OR TOWN	5. ST.	6. ZIP CODE
F P.O. BOX 125	G OTIS ORCHARDS	W A	9 9 0 2 7

IX. OWNER CERTIFICATION

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

A. NAME *(print or type)*	B. SIGNATURE	C. DATE SIGNED
W. A. Pickett	W. A. Pickett - Secretary	11/17/80

X. OPERATOR CERTIFICATION

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

A. NAME *(print or type)*	B. SIGNATURE	C. DATE SIGNED
W. A. Pickett	W. A. Pickett - Secretary	11/17/80

CONTINUE ON PAGE 5

Please print or type in the unshaded areas only
(fill-in areas are spaced for elite type, i.e., 12 characters/inch).

Form Approved OMB No. 158-R0175

FORM 1 GENERAL

EPA

ENVIRONMENTAL PROTECTION AGENCY

GENERAL INFORMATION

Consolidated Permits Program

(Read the "General Instructions" before starting.)

I. EPA I.D. NUMBER

F | D | D | 0 | 0 | 8 | 0 | 0 | 9 | 6 | 1

LABEL ITEMS

I. EPA I.D. NUMBER

III. FACILITY NAME

V. FACILITY MAILING ADDRESS

VI. FACILITY LOCATION

PLEASE PLACE LABEL IN THIS SPACE

GENERAL INSTRUCTIONS

If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent *(the area to the left of the label space lists the information that should appear)*, please provide it in the proper fill-in area*(s)* below. If the label is complete and correct, you need not complete Items I, III, V, and VI *(except VI-B which must be completed regardless)*. Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.

II. POLLUTANT CHARACTERISTICS

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of **bold-faced terms.**

SPECIFIC QUESTIONS	MARK 'X' YES	NO	FORM ATTACHED
A. Is this facility a **publicly owned treatment works** which results in a discharge to waters of the U.S.? (FORM 2A)		X	
C. Is this a facility which currently results in **discharges** to **waters of the U.S.** other than those described in A or B above? (FORM 2C)		X	
E. Does or will this facility treat, store, or dispose of **hazardous wastes**? (FORM 3)	X		
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X	
I. Is this facility a proposed **stationary source** which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an **attainment area**? (FORM 5)		X	

SPECIFIC QUESTIONS	MARK 'X' YES	NO	FORM ATTACHED
B. Does or will this facility *(either existing or proposed)* include a **concentrated animal feeding operation** or **aquatic animal production facility** which results in a **discharge to waters of the U.S.**? (FORM 2B)		X	
D. Is this a proposed facility *(other than those described in A or B above)* which will result in a **discharge** to **waters of the U.S.**? (FORM 2D)		X	
F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
J. Is this facility a proposed **stationary source** which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an **attainment area**? (FORM 5)		X	

III. NAME OF FACILITY

1 SKIP DREXLER ENTERPRISES INC

IV. FACILITY CONTACT

A. NAME & TITLE *(last, first, & title)*	B. PHONE *(area code & no.)*
2 PICKETT ALAN SECRETARY	509 624 7719

V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX

3 PO BOX 125

B. CITY OR TOWN	C. STATE	D. ZIP CODE
4 OTIS ORCHARDS	WA	99027

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER

5 5 MI E STATE LINE HWY 53

B. COUNTY NAME

KOOTENAI

C. CITY OR TOWN	D. STATE	E. ZIP CODE	F. COUNTY CODE *(if known)*
6 RATHDRUM	ID	83858	055

CONTINUED FROM THE FRONT

VII. SIC CODES *(4-digit, in order of priority)*

A. FIRST	B. SECOND
7 2992 (specify) OILS LUBRICATING; RE-REFINING	7 (specify)

C. THIRD	D. FOURTH
7 (specify)	7 (specify)

VIII. OPERATOR INFORMATION

A. NAME: 8 DREXLER ENTERPRIZES INC

B. Is the name listed in Item VIII-A also the owner? ☒ YES ☐ NO (66)

C. STATUS OF OPERATOR *(Enter the appropriate letter into the answer box; if "Other", specify.)*
F = FEDERAL
S = STATE
P = PRIVATE
M = PUBLIC *(other than federal or state)*
O = OTHER *(specify)*
R (56) (specify)

D. PHONE *(area code & no.)*: A 509 624 7719

E. STREET OR P.O. BOX: PO BOX 125

F. CITY OR TOWN: B OTIS ORCHARDS

G. STATE: WA

H. ZIP CODE: 99027

IX. INDIAN LAND
Is the facility located on Indian lands? ☐ YES ☒ NO (52)

X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES *(Discharges to Surface Water)*: 9 N	D. PSD *(Air Emissions from Proposed Sources)*: 9 P
B. UIC *(Underground Injection of Fluids)*: 9 U	E. OTHER *(specify)*: 9 (specify)
C. RCRA *(Hazardous Wastes)*: 9 R	E. OTHER *(specify)*: 9 (specify)

XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property bounderies. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

XII. NATURE OF BUSINESS *(provide a brief description)*

To transport and re-process (dry and filter) used oil into a useable fuel product.

XIII. CERTIFICATION *(see instructions)*

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

A. NAME & OFFICIAL TITLE *(type or print)*	B. SIGNATURE	C. DATE SIGNED
W. A. Pickett Secretary	W. A. Pickett - Secretary	11/17/80

COMMENTS FOR OFFICIAL USE ONLY

C

Form Approved O.M.B. No. 158-S80-0...

FORM 3510-1 RCRA

U.S. ENVIRONMENTAL PROTECTION AGENCY
HAZARDOUS WASTE PERMIT APPLICATION
Consolidated Permits Program
(This information is required under Section 3005 of RCRA.)

I. EPA I.D. NUMBER: 1 D D 0 0 0 8 0 0 9 6 1

FOR OFFICIAL USE ONLY

APPLICATION APPROVED	DATE RECEIVED (mo. day yr.)	COMMENTS
	6 0 / / 8 7	

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below (*mark one box only*) to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION (*place an "X" below and provide the appropriate date*)

X 1. EXISTING FACILITY (*See instructions for definition of "existing" facility. Complete item below.*)

FOR EXISTING FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED (*use the codes to the left*): 8 | 8 0 | 0 1 | 0 1

2. NEW FACILITY (*Complete item below.*)

FOR NEW FACILITIES PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR IS EXPECTED TO BEGIN: ___ | ___ | ___

B. REVISED APPLICATION (*place an "X" below and complete item I above*)

1. FACILITY HAS INTERIM STATUS

2. FACILITY HAS A RCRA PERMIT

III. PROCESSES – CODES AND DESIGN CAPACITIES

A. PROCESS CODE – Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process (*including its design capacity*) in the space provided on the form (*Item III-C*).

B. PROCESS DESIGN CAPACITY – For each code entered in column A enter the capacity of the process.

1. AMOUNT – Enter the amount.
2. UNIT OF MEASURE – For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:		
CONTAINER (*barrel, drum, etc.*)	S01	GALLONS OR LITERS
TANK	S02	GALLONS OR LITERS
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS
Disposal:		
INJECTION WELL	D79	GALLONS OR LITERS
LANDFILL	D80	ACRE-FEET (*the volume that would cover one acre to a depth of one foot*) OR HECTARE-METER
LAND APPLICATION	D81	ACRES OR HECTARES
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Treatment:		
TANK	T01	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR OR GALLONS PER HOUR OR LITERS PER HOUR
OTHER (*Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.*)	T04	GALLONS PER DAY OR LITERS PER DAY

UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G	LITERS PER DAY	V	ACRE-FEET	A
LITERS	L	TONS PER HOUR	D	HECTARE-METER	F
CUBIC YARDS	Y	METRIC TONS PER HOUR	W	ACRES	B
CUBIC METERS	C	GALLONS PER HOUR	E	HECTARES	Q
GALLONS PER DAY	U	LITERS PER HOUR	H		

EXAMPLE FOR COMPLETING ITEM III (*shown in line numbers X-1 and X-2 below*): A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

C | DUP | T/A | C | 1

LINE NUMBER	A. PROCESS CODE (*from list above*)	B. PROCESS DESIGN CAPACITY 1. AMOUNT (*specify*)	B. 2. UNIT OF MEASURE (*enter code*)	FOR OFFICIAL USE ONLY	LINE NUMBER	A. PROCESS CODE (*from list above*)	B. 1. AMOUNT	B. 2. UNIT OF MEASURE (*enter code*)	FOR OFFICIAL USE ONLY
X-1	S02	600	G		5				
X-2	T03	20	E		6				
1	S02	67,000	G		7				
2	S03	10	Y		8				
3					9				
4					10				

Continue from the front.

III. PROCESSES *(continued)*

C. SPACE FOR ADDITIONAL PROCESS COD[illegible] D. FOR DESCRIBING OTHER PROCESSES *(code "T0[illegible]")* FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

IV. DESCRIPTION OF HAZARDOUS WASTES

A. EPA HAZARDOUS WASTE NUMBER — Enter the four—digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four—digit number*(s)* from 40 CFR, Subpart C that describes the characteristic or toxic contaminants of those hazardous wastes.

B. ESTIMATED ANNUAL QUANTITY — For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non—listed waste*(s)* that will be handled which possess that characteristic or contaminant.

C. UNIT OF MEASURE — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:
   For listed hazardous waste: For each listed hazardous waste entered in column A select the code*(s)* from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.
   For non—listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code*(s)* from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non—listed hazardous wastes that possess that characteristic or toxic contaminant.
   Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code*(s)*.

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B,C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV *(shown in line numbers X-1, X-2, X-3, and X-4 below)* — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non—listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARD. WASTE NO. *(enter code)*	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE *(enter code)*	D. PROCESSES 1. PROCESS CODES *(enter)*	D. PROCESSES 2. PROCESS DESCRIPTION *(if a code is not entered in D(1))*
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				*included with above*

CONTINUE ON PAGE 3

Continued from page 2.
NOTE: Photocopy this page before completing if you have more than 26 wastes to list.

Form Approved OMB No. 158-S80004

FOR OFFICIAL USE ONLY

EPA I.D. NUMBER (enter from page 1)			
IDD000800961		DUP	2 DUP

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
1	D001	1,250,000	G	S02	
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					
13					
14					
15					
16					
17					
18					
19					
20					
21					
22					
23					
24					
25					
26					

EPA Form 3510-3 (6-80)

CONTINUE ON REVERS

Continued from the front

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3

EPA I.D. NO. (enter from page 1)

WAD000800961

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility *(see instructions for more detail)*.

VI. PHOTOGRAPHS

All existing facilities must include photographs *(aerial or ground—level)* that clearly delineate all existing structures; existing storage, treatment and disposal areas, and sites of future storage, treatment or disposal areas *(see instructions for more detail)*.

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE *(degrees, minutes, & seconds)*	LONGITUDE *(degrees, minutes, & seconds)*
47 48 012	116 48 000

VIII. FACILITY OWNER

☐ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER	2. PHONE NO. *(area code & no.)*
E DREXLER ENTERPRIZES INC.	509-624-7719

3. STREET OR P.O. BOX	4. CITY OR TOWN	5. ST.	6. ZIP CODE
F P.O. BOX 125	G OTIS ORCHARDS	WA	99027

IX. OWNER CERTIFICATION

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

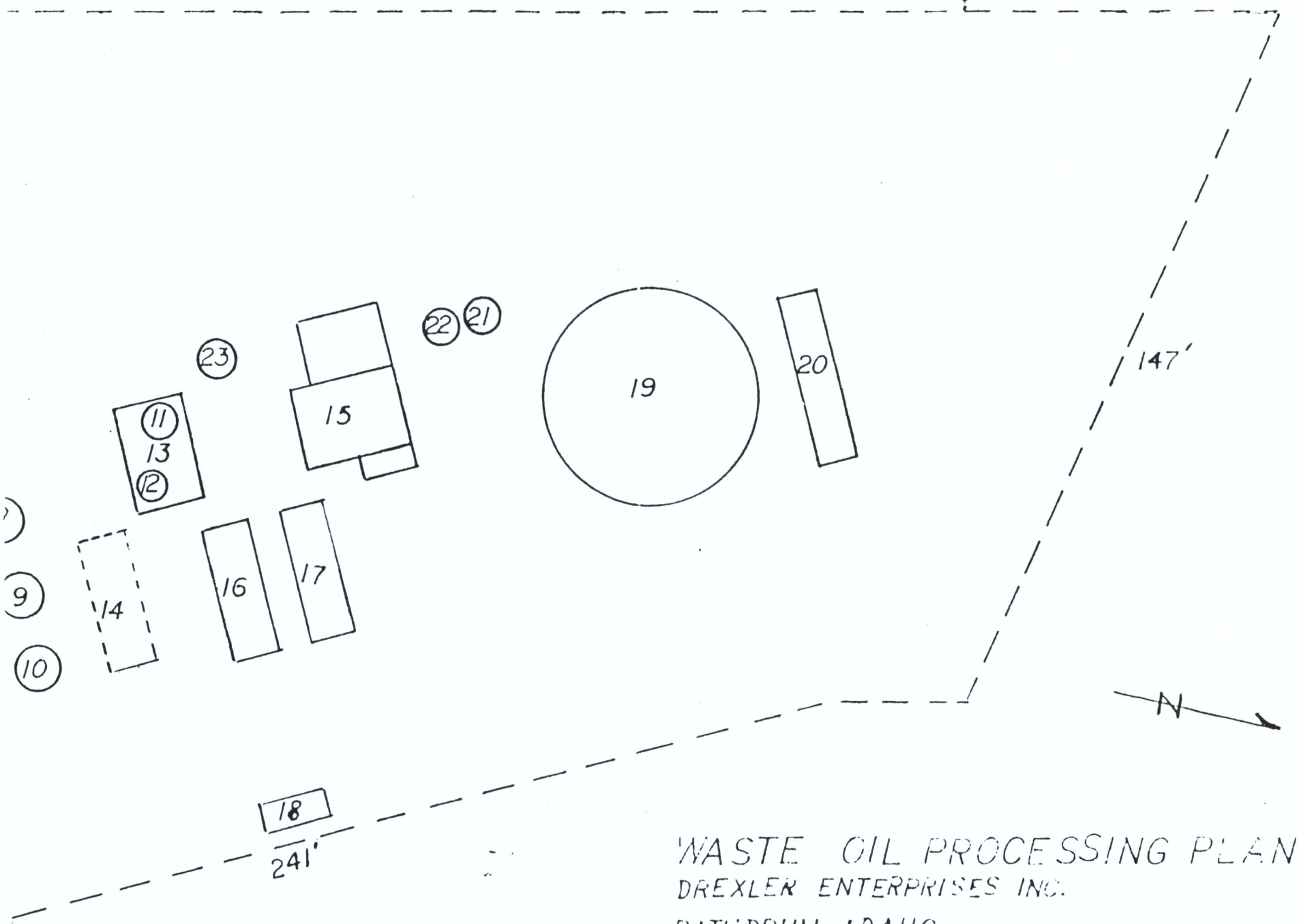
A. NAME *(print or type)*	B. SIGNATURE	C. DATE SIGNED
W. A. Pickett	W. A. Pickett - Secretary	11/17/80

X. OPERATOR CERTIFICATION

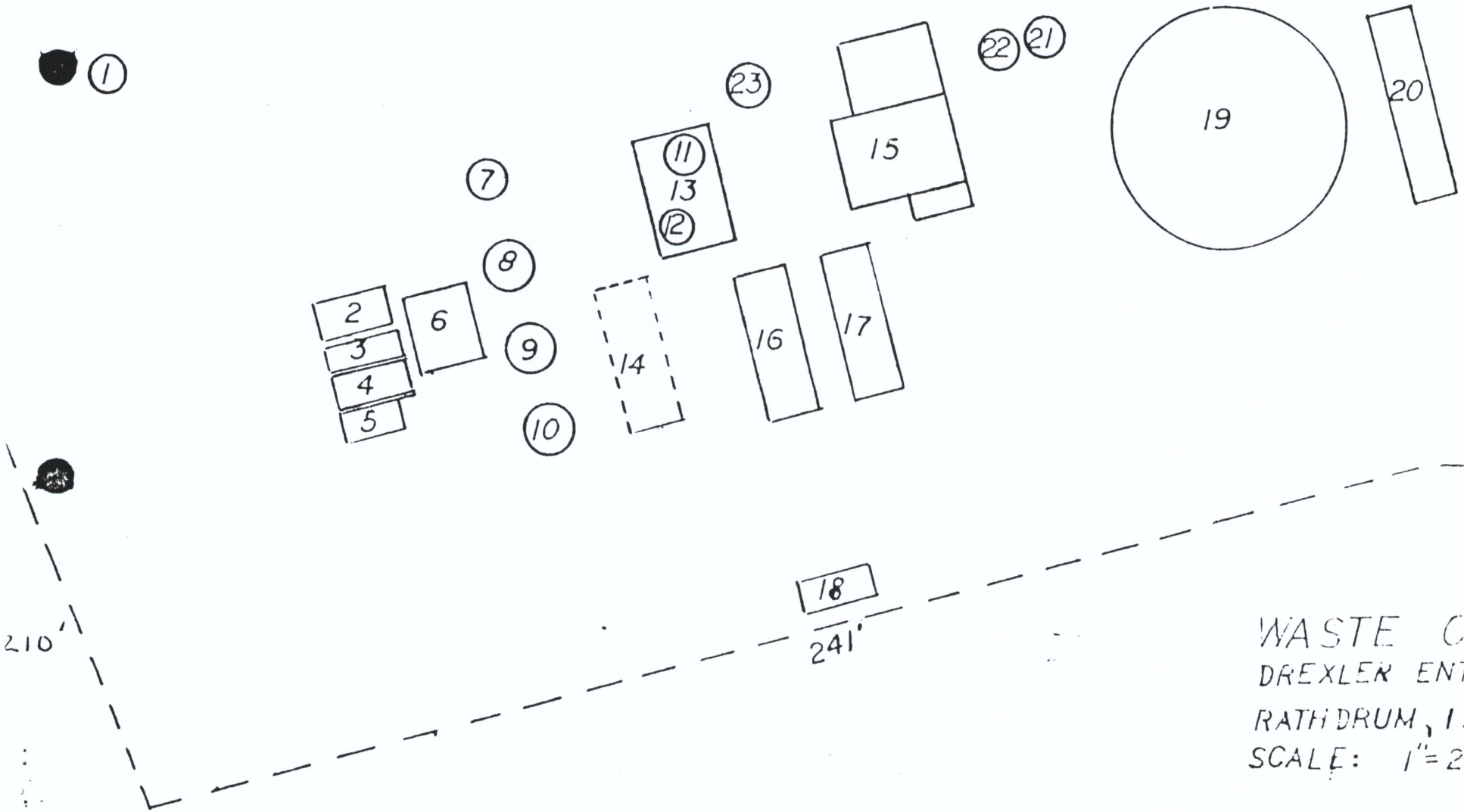
I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true,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

A. NAME *(print or type)*	B. SIGNATURE	C. DATE SIGNED
W. A. Pickett	W. A. Pickett - Secretary	11/17/80

CONTINUE ON PAGE 5



WASTE OIL PROCESSING PLANT
DREXLER ENTERPRISES INC.
RATHDRUM, IDAHO
SCALE: 1" = 25'



WASTE OIL P
DREXLER ENTERPRI
RATHDRUM, IDAHO
SCALE: 1"=25'

Please print or type in the unshaded areas only.
(Print—in areas are spaced for elite type, i.e., 12 characters/inch).

Form Approved OMB No. 158-S80004

FORM 3 RCRA

EPA

U.S. ENVIRONMENTAL PROTECTION AGENCY

HAZARDOUS WASTE PERMIT APPLICATION

Consolidated Permits Program

(This information is required under Section 3005 of RCRA.)

I. EPA I.D. NUMBER: F 1 D D 0 0 0 8 0 0 9 6 1

FOR OFFICIAL USE ONLY

APPLICATION APPROVED	DATE RECEIVED (yr., mo., & day)	COMMENTS
	8 0 1 1 1 9	

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below *(mark one box only)* to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION *(place an "X" below and provide the appropriate date)*

[X] 1. EXISTING FACILITY *(See instructions for definition of "existing" facility. Complete item below.)*

FOR EXISTING FACILITIES, PROVIDE THE DATE *(yr., mo., & day)* OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED *(use the boxes to the left)*

C	YR.	MO.	DAY
8	8 0	0 1	0 1

[ ] 2. NEW FACILITY *(Complete item below.)*

FOR NEW FACILITIES, PROVIDE THE DATE *(yr., mo., & day)* OPERATION BEGAN OR IS EXPECTED TO BEGIN

YR.	MO.	DAY

B. REVISED APPLICATION *(place an "X" below and complete Item I above)*

[ ] 1. FACILITY HAS INTERIM STATUS

[ ] 2. FACILITY HAS A RCRA PERMIT

III. PROCESSES — CODES AND DESIGN CAPACITIES

A. PROCESS CODE — Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process *(including its design capacity)* in the space provided on the form *(Item III-C)*.

B. PROCESS DESIGN CAPACITY — For each code entered in column A enter the capacity of the process.

1. AMOUNT — Enter the amount.
2. UNIT OF MEASURE — For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:		
CONTAINER *(barrel, drum, etc.)*	S01	GALLONS OR LITERS
TANK	S02	GALLONS OR LITERS
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS
Disposal:		
INJECTION WELL	D79	GALLONS OR LITERS
LANDFILL	D80	ACRE-FEET *(the volume that would cover one acre to a depth of one foot)* OR HECTARE-METER
LAND APPLICATION	D81	ACRES OR HECTARES
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Treatment:		
TANK	T01	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
OTHER *(Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)*	T04	GALLONS PER DAY OR LITERS PER DAY

UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G	LITERS PER DAY	V	ACRE-FEET	A
LITERS	L	TONS PER HOUR	D	HECTARE-METER	F
CUBIC YARDS	Y	METRIC TONS PER HOUR	W	ACRES	B
CUBIC METERS	C	GALLONS PER HOUR	E	HECTARES	Q
GALLONS PER DAY	U	LITERS PER HOUR	H		

EXAMPLE FOR COMPLETING ITEM III *(shown in line numbers X-1 and X-2 below)*: A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

C DUP 1

LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT (specify)	2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY	LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT	2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY
X-1	S 0 2	600	G		5				
X-2	T 0 3	20	E		6				
1	S 0 2	67,000	G		7				
2	S 0 3	10	Y		8				
3					9				
4					10				

CONTINUED FROM THE FRONT

VII. SIC CODES (4-digit, in order of priority)

A. FIRST	B. SECOND
2992 (specify) OILS LUBRICATING; RE-REFINING	(specify)

C. THIRD	D. FOURTH
(specify)	(specify)

VIII. OPERATOR INFORMATION

A. NAME: ~~DREXLER ENTERPRIZES INC~~ ARRCOM INC

B. Is the name listed in Item VIII-A also the owner? ☒ YES ☐ NO

C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)
F = FEDERAL
S = STATE
P = PRIVATE
M = PUBLIC (other than federal or state)
O = OTHER (specify)
R (specify)

D. PHONE (area code & no.): A 509 624 7719

E. STREET OR P.O. BOX: PO BOX 125

F. CITY OR TOWN: BOTIS ORCHARDS

G. STATE: WA

H. ZIP CODE: 99027

IX. INDIAN LAND

Is the facility located on Indian lands? ☐ YES ☒ NO

X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water): N	D. PSD (Air Emissions from Proposed Sources): P
B. UIC (Underground Injection of Fluids): U	E. OTHER (specify): (specify)
C. RCRA (Hazardous Wastes): R	E. OTHER (specify): (specify)

XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property bounderies. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements. B

XII. NATURE OF BUSINESS (provide a brief description)

To transport and re-process (dry and filter) used oil into a useable fuel product.

XIII. CERTIFICATION (see instructions)

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

A. NAME & OFFICIAL TITLE (type or print)	B. SIGNATURE	C. DATE SIGNED
W. A. Pickett Secretary	W. A. Pickett - Secretary	11/17/80

COMMENTS FOR OFFICIAL USE ONLY

C

Arrcom Oil Co., Inc.
701 Bozarth
P.O. Box 56
Woodland, Wa. 98674
(206) 225-9733

February 3, 1981

EPA Region X
M/S 530-A
1200 Sixth Avenue
Seattle, WA 98101

RE: EPA ID # IDD000800961

RECEIVED
FEB 5 1981
PROGRAM DEVELOPMENT SECTION

Attn: Linda Dawson

Dear Ms Dawson:

As we discussed in our phone conversation of 2-3-81, I am submitting this letter to respectively request that the Environmental Protection Agency exercise its discretion in issuing an Interim Status Compliance Letter ("ISCL"), Pursuant to Title 40 CFR part 122.

Drexler Enterprises Incorporated operates a facility in Rathdrum, Idaho, EPA ID# IDD000800961. The Notification of Hazardous Waste Activity was filed late. However the ID # was issued and the November 19th Form 3 application was submitted on time. This facility picks up waste oil and treats it for reuse. As waste oil is not regulated at present and because the nature of this activity benefits the public interest we would request the Interim Status Compliance Letter.

DEI operates in consolidation with Arrcom, Inc., a Washington corporation located in Woodland, Washington. Its President is Wally Drexler, whose signature will appear below in this request. Arrcom, Inc. EPA I.D.# WAD087462503 is up to date on all applications. Both facilities are complying with all applicable substantive environmental standards.

Thank You.

EPA EXHIBIT
4-IDAHO

to V. C. 2/11/81

Arrcom Oil Co., Inc.
701 Bozarth
P.O. Box 56
Woodland, Wa. 98674
(206) 225-9733

February 5, 1981

EPA Region X
M/S 530-A
1200 Sixth Ave.
Seattle, WA 98101

Attn: Linda Dawson

Dressler Rathdrum, I

Dear Ms Dawson:

Enclosed is the ammended version of our Form 3 for the Arrcom facility. I will submit the same for DEI later as it will require a different signature. At that time I will also submit the request for the "ISCL".

Thank You.

Yours truly,

James C. Ivers

James Cleve Ivers
Purchasing Agent
Arrcom, Inc.

JCI/lw
(Encl.)

EPA EXHIBIT
5-IDAHO

TELEPHONE USE REPORT

TO BE USED ON ALL LONG DISTANCE TELEPHONE CALLS, INCOMING OR OUTGOING, AND ANY LOCAL CALLS MERITING RECORDING

PREPARE IMMEDIATELY - SUBMIT DAILY

ROUTING

CALL FROM: Linda Dawson

TITLE:

LOCATION & PHONE NO.:

DATE: 8/4/81

TIME: PM

CALL TO: Jim Ivers

TITLE: Arcom Oil

LOCATION & PHONE NO.: Tacoma 537-0068

SUMMARY OF CALL:

Re: Drexler enterprises, Rathdrum, Idaho. Facility has not received IS as they notified late. however since - May '80 facility has handled only waste oil; all waste oil is recycled - not contaminated w/ solvents

are submitting a revised Form 3 to add solvents; will also correct units on 1a 3d 5 ~~and~~

also discussed signature - secretary appears to meet requirement

I will be sending IS letter addressed to Wally Drexler in Woodland WA

EPA EXHIBIT 6 - IDAHO

Linda Dawson
(Signature)

EPA-X-4

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

M/S 530

AUG 13 1981

Wally Drexler
Arrcom Oil Company, Incorporated
P.O. Box 56
Woodland, Washington 98674

Re: Facility #IDD000800961

Dear Mr. Drexler:

This is to acknowledge that the Environmental Protection Agency has received: (1) A notification pursuant to Section 3010 of the Resource Conservation and Recovery Act for the facility with the EPA Identification Number shown above; and (2) Part A of a Hazardous Waste Permit Application for that facility, including a signed statement that the operation of the facility, or its construction, began prior to November 19, 1980. While the information provided by these submissions has not been fully reviewed for completeness or accuracy, EPA will accept this information as an initial qualification for interim status pursuant to Section 3005 of the Act. If after further review of this information, EPA determines that the owner or operator did not fulfill all the requirements for interim status, EPA may treat the owner or operator as not having qualified for interim status pursuant to that Section and will advise the owner or operator of that determination. Facility owners and operators with interim status must comply with the standards set forth at 40 CFR Part 265 until a permit is issued. Interim status may be terminated if the owner or operator fails to furnish any additional information requested by EPA in order to process a permit application.

Your Part A permit application lists tank storage of D001 (ignitable) wastes, to cover the storage of waste oil prior to recycling. Pursuant to Section 122.23(c)(1) of the permit standards, new hazardous wastes not previously identified in Part A of the permit application may be treated, stored, or disposed of at a facility if the owner or operator submits a revised Part A permit application prior to any handling of the new waste material. We have information indicating that this facility has received spent solvent. If the solvent is any of those identified as Hazardous Waste Nos. F001 through F005 (list enclosed), this must be included on your permit application and you should submit a revised application immediately.

Please call Linda Dawson at (206) 442-1260 if you have any questions.

CONCURRENCES

SYMBOL	Sincerely,						
SURNAME	Tobias Hegdahl, Chief Program Development Section				bcc: Jim Malm, DOE		EPA EXHIBIT 7 - IDAHO
DATE	cc: Athena Lalikos, EPA				Dawson:LW:8/12/81	8A	
EPA Form 1320-1	Beryl Koch, IDHW						OFFICIAL FILE COPY

TELEPHONE USE REPORT

TO BE USED ON ALL LONG DISTANCE TELEPHONE CALLS, INCOMING OR OUTGOING, AND ANY LOCAL CALLS MERITING RECORDING

PREPARE IMMEDIATELY - SUBMIT DAILY

ROUTING

CALL FROM: Al Pickett

TITLE: Drexler Enterprises / Arrcom

LOCATION & PHONE NO.: Rathdrum, Idaho

DATE: 12/3/81

TIME: AM

CALL TO: Linda Dawson

TITLE:

LOCATION & PHONE NO.: 208 - 687 - 793 Rathdrum

509 - 624 - 7719 Otis Orchards

SUMMARY OF CALL:

re: my conversation w/ Wally Drexler regarding the need to revise Part A - Pickett will be handling this; will also submit a permit application for Arrcom in Tacoma Idaho facility takes waste oil + solvent; blends + resells. Oil + solvent goes through a shaker (vibrating screen) to take out particulates; may store particulate sludge in a waste pile (currently listed on Part A).

I will return the Part A (Rathdrum) for corrections, send him a list of the F001-F005 solvents a Blank Part A for Arrcom - Tacoma, and check the Arrcom - Woodland Part A to see if any changes are necessary

(Signature)

EPA EXHIBIT 8 - IDAHO

EPA X-1

TELEPHONE USE REPORT

TO BE USED ON ALL LONG DISTANCE TELEPHONE CALLS, INCOMING OR OUTGOING, AND ANY LOCAL CALLS MERITING RECORDING

PREPARE IMMEDIATELY - SUBMIT DAILY

ROUTING

CALL FROM: Linda Dawson

TITLE:

LOCATION & PHONE NO.:

DATE: 12/3/81

TIME: AM

CALL TO: Willy Dresler

TITLE: Pres Arcom Oil

LOCATION & PHONE NO.: contacted at Rathdrum Id facility 208-687-1783

SUMMARY OF CALL:

Told him that we had been getting reports about the Rathdrum facility taking spent solvents - explained to him that his Part A lists no F001-F005 solvents thus, can't legally handle them. He will submit revised Part A ...

Also asked about his Arcom facility in Tacoma: reports that they were handling hazardous waste there - he said that they do the waste oil & solvent at this facility. Explained to him that facility must have interim status to handle listed solvents - he needs to get permit application in right away.

Also Golden Penn Oil - Seattle (Harbor Island) his operations this (Jerry Dresler), handles waste oil + solvents will submit permit application for this also

LD

(Signature)

EPA EXHIBIT 9 - IDAHO

EPA Form 1

U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION X
1200 SIXTH AVENUE
SEATTLE, WASHINGTON 98101

December 4, 1981

REPLY TO ATTN OF: 530-A

CERTIFIED MAIL--RETURN RECEIPT REQUESTED

Alan Pickett
Arrcom, Incorporated
P.O. Box 125
Otis Orchards, Washington 99027

Dear Mr. Pickett:

As discussed in our phone conversation of December 3, 1981, I am returning the Part A permit application for facility #IDD000800961 in Rathdrum, Idaho. The application must be revised to reflect the facility's name change, and to list those solvents which your facility handles which are not currently covered by the application. I have enclosed a list of those spent solvents specifically listed as Hazardous Waste Numbers F001 through F005. As you know, a facility with interim status can handle only those hazardous wastes which are listed on their Part A permit application.

In our phone conversation you stated that residues generated from running oil and solvent through a shaker may at times be stored in a waste pile. Page 1 of 5 of the application correctly lists process code S03 for the waste pile; however, you must estimate the annual quantities of residues generated and stored in a waste pile and list this information on Page 3 of 5. The Part A application for the Arrcom facility in Woodland, Washington was revised by Jim Ivers of your company in February to include Hazardous Waste Numbers F003 and F005. However, I am returning the application to you so that you also may add the waste pile information to Page 3 of 5 of this application.

I have enclosed a blank Part A application form and a Form 8700-12, Notification of Hazardous Waste Activity. These must be submitted for the Arrcom facility in Tacoma, if this facility is storing or will be handling any of the listed spent solvents of Part 261.31 (F001-F005).

The completed applications must be returned to EPA by no later than January 4, 1982. You may either amend the Rathdrum application to make the necessary changes or submit a new form. In either case, we require that the certification (Items IX and X) be re-signed and re-dated.

EPA EXHIBIT
10-IDAHO

Please call me at (206) 442-1260 if you have any questions in filling out these forms.

Sincerely,

Linda Dawson

Linda Dawson,
Hazardous Waste Branch

Enclosures

cc: Wally Drexler, President, Arrcom, Inc.
Tom Cook, WA Department of Ecology
Jim Oberlander, WA Department of Ecology
Lyman Nielson, Washington Operations Office, EPA
Daryl Koch, Idaho Department of Health and Welfare
Athena Lalikos, Idaho Operations Office, EPA

JAN 11 1982

530

CERTIFIED MAIL - RETURN RECEIPT _REQUESTED

Alan Pickett
Arcom ~~Ancom~~, Incorporated
P.O. Box 125
Otis Orchards, Washington 99027

Re: Hazardous Waste Permit Applications

Dear Mr. Pickett:

As we discussed, I am returning your forms for corrections. Specifically, the following must be added or revised:

Rathdrum Page 3 of 5, all units of measure and annual quantities must be converted to pounds (P) or tons (T);

Page 4 of 5, certification must be re-signed and re-dated;

Application needs a USGS topographic map of the area extending to at least one mile beyond property boundaries.

Tacoma Page 1 of 5, existing facility date;

Page 3 of 5, all units of measure and annual quantities must be converted to pounds (P) or tons(T);

Application needs a facility drawing, topographic map and photographs~~s and photographs~~.

Page 4 of 5, entire page must be completed.

Woodland Page 3 of 5, units of measure and annual quantity on line 4 must be converted to pounds (P) or tons (T).

EPA EXHIBIT
11 - IDAHO

Thank you for your cooperation. Please call me at (206) 442-1260 if your have any further questions. These forms must be returned to EPA by January 22, 1982.

Sincerely,

Linda Dawson
Waste Management Branch

Enclosures

LDawson:nay 01-11-82

PS Form 3811, Jan. 1979

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

SENDER: Complete items 1, 2, and 3.
Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one.)
- ☐ Show to whom and date delivered ..... ___ ¢
- ☐ Show to whom, date and address of delivery ... ___ ¢
- ☒ RESTRICTED DELIVERY
  Show to whom and date delivered ..... ___ ¢
- ☐ RESTRICTED DELIVERY.
  Show to whom, date, and address of delivery $ ___

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
Alan Pickett, ~~Ancom~~ Arrcom, Inc
P.O. Box 125
Otis Orchards, WA 99027

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	0310398	

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent
A. Pickett

4. DATE OF DELIVERY

POSTMARK
JAN 15 1982

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS
MK

☆GPO : 1979-288-848

No. 0310398

RECEIPT FOR CERTIFIED MAIL
NO INSURANCE COVERAGE PROVIDED—
NOT FOR INTERNATIONAL MAIL
(See Reverse)

SENT TO
Alan Pickett, ~~Ancom~~ Arrcom, Inc

STREET AND NO.
P.O. Box 125

P.O., STATE AND ZIP CODE
Otis Orchards, WA 99027

POSTAGE		$
CONSULT POSTMASTER FOR FEES — CERTIFIED FEE		¢
OPTIONAL SERVICES — SPECIAL DELIVERY		¢
OPTIONAL SERVICES — RESTRICTED DELIVERY		¢
RETURN RECEIPT SERVICE	SHOW TO WHOM AND DATE DELIVERED	¢
RETURN RECEIPT SERVICE	SHOW TO WHOM, DATE, AND ADDRESS OF DELIVERY	¢
RETURN RECEIPT SERVICE	SHOW TO WHOM AND DATE DELIVERED WITH RESTRICTED DELIVERY	¢
RETURN RECEIPT SERVICE	SHOW TO WHOM, DATE AND ADDRESS OF DELIVERY WITH RESTRICTED DELIVERY	¢
TOTAL POSTAGE AND FEES		$

POSTMARK OR DATE
sent 1/11/82
for Woodland
Tacoma
Rothdrum

PS Form 3800, Apr. 1976

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

M/S 530

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

FEB 0 9 1982

Alan Pickett
Arrcom, Incorporated
P.O. Box 125
Otis Orchards, WA 99027

Dear Mr. Pickett:

As discussed with Linda Dawson on February 8, 1982, your company failed to respond to a January 22, 1982 deadline for resubmittal of the hazardous waste permit applications for the Rathdrum, Tacoma and Woodland facilities. You stated that you are currently reviewing the activities at these sites and determining whether you wish to continue to operate hazardous waste management facilities, and stated that the Woodland facility may close altogether. You agreed to advise EPA of your decision and/or resubmit the permit applications by no later than February 19, 1982.

Owners or operators of hazardous waste management facilities must submit a closure plan to the EPA at least 180 days before the date they expect to begin closure (40 CFR Part 265.112). This plan must include an inventory of the wastes in storage, a description of steps needed to decontaminate facility equipment, the date when completion of final closure is anticipated, and intervening milestone dates which will allow tracking of the progress of closure. If you do plan to close any of your facilities within the next 180 days, you must submit your closure plan immediately.

The issue of your revising and/or re-submitting the Part A permit applications has been outstanding for some time. We feel we have provided ample guidance and time for your reassessment of each facility, correcting the forms, and re-submitting to EPA. I do want to provide this one additional opportunity for you to voluntarily submit the requested information; however, I would consider your failure to re-submit by the agreed date of February 19, 1982 as a basis for referral to our enforcement program for appropriate action.

LDawson:nay 02-09-82

CONCURRENCES

SYMBOL	L.Dawson	K.Feigner						
SURNAME								
DATE								

EPA EXHIBIT 13-IDAHO

EPA Form 1320-1 (12-70) OFFICIAL FILE COPY

Please call me at (206) 442-1253 if you have any questions.

Sincerely,

Kenneth D. Feigner, Chief
Waste Management Branch

cc: Wally Drexler, President, Arrcom Inc.
Tom Cook, Washington Department of Ecology
Jim Oberlander, Washington Department of Ecology
Daryl Koch, Idaho Department of Health & Welfare
Steve Provant, Idaho Operations Office, EPA
Jim Dunn, Montana Operations Office, EPA
Don Donaldson, EPA Enforcement

PS Form 3811, Jan. 1979

SENDER: Complete items 1, 2, and 3. Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one.)
- ☐ Show to whom and date delivered..... ___ ¢
- ☐ Show to whom, date and address of delivery... ___ ¢
- ☒ RESTRICTED DELIVERY
- Show to whom and date delivered..... ___ ¢
- ☒ RESTRICTED DELIVERY.
- Show to whom, date, and address of delivery.$ ___

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
Alan Pickett
Arrcom, Inc.
P.O. Box 125 Otis Orchards, WA 99027

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	0310391	

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent
A. Pickett

4. DATE OF DELIVERY — POSTMARK

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE — CLERK'S INITIALS

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

☆GPO 1979 254-845

No. 0310391

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED—
NOT FOR INTERNATIONAL MAIL
(See Reverse)

SENT TO: Alan Pickett
STREET AND NO.: PO Box 125
P.O. STATE AND ZIP CODE: Otis Orchards Wa 99027

POSTAGE			$
CONSULT POSTMASTER FOR FEES	CERTIFIED FEE		¢
	OPTIONAL SERVICES	SPECIAL DELIVERY	¢
		RESTRICTED DELIVERY	¢
		RETURN RECEIPT SERVICE: SHOW TO WHOM AND DATE DELIVERED	¢
		RETURN RECEIPT SERVICE: SHOW TO WHOM, DATE, AND ADDRESS OF DELIVERY	¢
		RETURN RECEIPT SERVICE: SHOW TO WHOM AND DATE DELIVERED WITH RESTRICTED DELIVERY	¢
		RETURN RECEIPT SERVICE: SHOW TO WHOM, DATE AND ADDRESS OF DELIVERY WITH RESTRICTED DELIVERY	¢
TOTAL POSTAGE AND FEES			$

POSTMARK OR DATE

PS Form 3800, Apr. 1976

RECORD OF COMMUNICATION	☒ PHONE CALL ☐ DISCUSSION ☐ FIELD TRIP ☐ CONFERENCE ☐ OTHER (SPECIFY) (Record of item checked above)

TO:	FROM:	DATE
Al Pickett Arrcom 208-687-1783	L. DAWSON	2/5/82 TIME AM

SUBJECT
whereabouts of his applications which were due back on 1/22/82

SUMMARY OF COMMUNICATION

2/5 no answer at 208-687-1783 Rathdrum, Id
509-624-7719 Otis Orchards, WA - number disconnected
206-225-9733 Arrcom, Woodland, WA - number disconnected
206-272-7701 Arrcom, Tacoma, WA - number disconnected

2/8 no answer at Rathdrum

2/8 509-[illegible] Otis Orchards Al Pickett [illegible] did not meet [illegible] deadline for resubmitting their applications - he said they are currently deciding [illegible] at Woodland, Tacoma or Rathdrum. Woodland facility may close altogether.

CONCLUSIONS, ACTION TAKEN OR REQUIRED

He agreed to respond on Feb 19 with [illegible] exhibit [illegible] which [illegible]

INFORMATION COPIES
TO:

EPA EXHIBIT
12 - IDAHO

RECORD OF COMMUNICATION	☒ PHONE CALL ☐ DISCUSSION ☐ FIELD TRIP ☐ CONFERENCE ☐ OTHER (SPECIFY) (Record of item checked above)	
TO: DAVID DREXLER ARRCOM TACOMA 206-673-5347	FROM: L. DAWSON	DATE 3/4/82 TIME AM
SUBJECT Letter to RA regarding Rathdrum Closure / TACOMA Part A		

SUMMARY OF COMMUNICATION

D. Drexler out; given another Tacoma # to leave message: 206-752-8986 Told that Wally Drexler can also be reached here.
Left message w/ D. Drexler that it is urgent that he call me . . .

3/5/82 206-752-8986 (# is to their accountants)
Left message for W. + D. Drexler "extremely important that they call me . . ."

CONCLUSIONS, ACTION TAKEN OR REQUIRED

INFORMATION COPIES TO:

EPA EXHIBIT 14-IDAHO

RECORD OF COMMUNICATION	☒ PHONE CALL ☐ DISCUSSION ☐ FIELD TRIP ☐ CONFERENCE ☐ OTHER (SPECIFY) (Record of item checked above)

TO:	FROM:	DATE / TIME
Al Pickett Arrcom 509-484-8282	L. DAWSON	DATE 3/5/82 TIME AM

SUBJECT
letter they were to send us regarding Rathdrum + Woodland

SUMMARY OF COMMUNICATION
CLOSURE; Part A (revised) for Tacoma

Rathdrum + Woodland facilities still closed; still possible that they will re-lease Rathdrum. No desire to re-lease Woodland.

W. Bingham also owns Woodland facility...

Heard that Chempro may look at Woodland for lease..

Pickett doesn't think they handled solvent at Woodland, just waste oil

Discussed fact that they didn't follow closure procedures for Rathdrum; wont matter if they re-lease it.

Tacoma facility does still want to pursue a storage permit. He's been trying to get D. Drexler to get letter and Tacoma Part A in.

CONCLUSIONS, ACTION TAKEN OR REQUIRED

INFORMATION COPIES
TO:

EPA EXHIBIT
15-IDAHO

EPA Form 1300-6 (7-72) REPLACES EPA HQ FORM 1300-6 AND ...

◦ RECORD OF COMMUNICATION	☐ PHONE CALL ☐ DISCUSSION ☒ FIELD TRIP ☐ CONFERENCE ☐ OTHER (SPECIFY) (Record of item checked above)	
TO: Betty W., Glen R., & file	FROM: Mike Brown, Waste Management Br.	DATE 6-9-82 & 6-22-82 TIME 9:30 → 11:00 AM

SUBJECT

Ancom → Dexter family

SUMMARY OF COMMUNICATION

Will Abercrombie (WDOE - SW) and myself inspected the Ancom facility located in Tacoma (WAD 98-066-4718) on 6-9-82. The following information was obtained

- Dexter Family - Wally (father) (= Dange) Hazel (mother)
  - Terry, David, Tom } sons
- Past & present names of the facilities
  - Dexter Enterprises Inc. (= DEI)
    - (dba?) Ancom Inc
  - Terry Dexter Inc. (= TDI)
    - dba Golden Penn Oil → No HW
    - dba Western Pacific Vacuum Service

other companies
TAD = Tommy & David
WH = Wally & Hazel

- Geographical Location

Place	EPA ID	Co. Name
Rathdrum, Id.	IDD 00-800-9961	Ancom, DEI
Woodland, WA	WAD 08-746-2503	Ancom, DEI
Tacoma, WA	WAD 98-066-4718	Ancom, DEI, TDI
Seattle, WA	WAD 00-064-3593	TDI, Western Pacific Vacuum

~~CONCLUSIONS, ACTION TAKEN OR REQUIRED~~

- Responsible parties
  - Rathdrum, Id → Wally (operator); Warren Bingham (owner)
  - Woodland, WA → Wally ("); Warren Bingham (owner)
  - * Tacoma, WA → Terry ("); ? (")
  - Seattle, WA → Terry ("); ? (")

* Tacoma facility is subleasing from Ancom (Nez)

EPA Exhibit 16 - Idaho

INFORMATION COPIES
TO: Vince, Mike Bessell, Glen R

EPA Form 1300-6 (7-72) REPLACES EPA HQ FORM 5300-3 WHICH MAY BE USED UNTIL SUPPLY IS EXHAUSTED.

RECORD OF COMMUNICATION	☐ PHONE CALL ☐ DISCUSSION ☐ FIELD TRIP ☐ CONFERENCE ☐ OTHER (SPECIFY) (Record of item checked above)

TO: File	FROM: Mike Brown RCRA Compliance	DATE 6-22-82 TIME 2:00 → 3:30

SUBJECT Responsibility for Rothdrum & Woodland

SUMMARY OF COMMUNICATION

Conference: Mike Brown Warren Bingham George Hofer

overview: general introductions → background of RCRA law → EPA view of O/O responsibility → history of Woodland & Rothdrum sites → Financial requirements (Corrie Adams)

Info from Warren Bingham

- Warren Bingham (WB) is a retired Industrial Engineer from the UPS.
- Bought four pieces of property from Wally Drexler in Jan 1980. Two of these properties were homes and two (Woodland & Rothdrum) were waste recycling sites.
- The sales Drexler → Bingham were a sale least back arrangements. Wally Drexler had agreed to lease for two years Jan 80 → Jan 82.
- Wally Drexler had a serious heart attack Dec 79 (unknown to WB until after signing. Wally was unable to work for 1 yr.
- David Drexler took over in his absence
- The First 14 payments were made but they ~~[illegible]~~ were received later and later in the month. All payments stopped in Mar 81

CONCLUSIONS, ACTION TAKEN OR REQUIRED

- WB brought suit in Mar 81 WB gave Wally three month extensions because of his failure to perform
- WB finally locked Wally out of both sites
- Presently, we (EPA & State) are scheduling an inspection ~~with~~ at both sites to determine if HW is present at this time

INFORMATION COPIES TO:

- Wally Drexler took all records from the site as well as some equipment when he was locked out.

EPA EXHIBIT 17-IDAHO

EPA Form 1300-6 (7-72) REPLACES EPA HQ FORM 8300-3 WHICH MAY BE USED UNTIL SUPPLY IS EXHAUSTED.

History of Wally Drexler

- originally from midwest
- injured in War & has use of one eye
- claimed Bankruptcy a few years ago
- worked as a chemist for a local oil refinery
- closed down by Puget Sound Pollution Control Agency in the mid 1970's (Superior Oil Service - Woodinville)
- Wherhauser has brought suit against Wally Drexler recently
- Grand Jury has investigated Wally last year.
- home was Woodlawn presently Tacoma
- Wally bought the Rothdrum site from Alan Pickett who was hired by Wally to run the facility.
- Mr. Foss in Tacoma is Wally's attorney.
- WB considers Wally to be a talented person who over extended his capital resources

EPA received 7-8-82 MSB

July 1, 1982

Mr. George Hofer
Environmental Protection Agency
1200 6th Ave - Mail Stop #533
Seattle, Washington 98101

Dear George,

This letter is sent to inform you that I am meeting with Mike Brown and representatives of the Washington Dept of Ecology at my Woodland, Wash. Waste Oil Plant on 7/9/82 at 9:30 A.M. and at the Rathdrum, Idaho plant on 7/20/82 at 9:30 A.M.

These meetings are followups to our meeting a week and a half ago in your Seattle office.

This will be my first involvement with on site inspection and it will be beneficial to my understanding of the problems.

I am anxious to comply with regulations and if there is a presence of hazardous waste materials on these premises the proper action can be determined.

Best Regards,
Warren W. Bingham

EPA EXHIBIT
12 - IDAHO

TRIP REPORT MIKE BROWN, AIR AND WASTE MGMT. DIV.

Date: 7-20-82 Time: 9:30 to 11:00 site Babin's Office: 11:45 to 1:00

Place: Arrcom; Rathdrum, Idaho. IDD 00-080-0961

People: Mike Brown: EPA - A & WMD
Athena Lalikos; EPA - IOO
Ken Babin; Idaho Dept. of Health
Warren Bingham; Owner

Purpose: RCRA ISS Inspection (Brown and Babin)
PCB Inspection (Athena)

Map: Attached Pictures: File 12 pictures
Samples: Taken

Notes:

Site: Rathdrum

- First RCRA inspection. Ken Babin had filled out an inspection report previously but the inspection was not too useful because it was carried out via telephone call and did not contain quality/quantity of information.

- Sites was disorganized and cluttered
  - Tanks were turned on their sides
  - Containers were stored here and there with some turned over leaking a tarry liquid leaking out.

  - Ponding of oily water was seen around central processing area (Building 15 & 13).

  - Roadway going around tanks and processing area had been soaked with oil for a long period of time.

  - Most of the processing equipment was caked with oil and crude.

  - Site according to Ken Babin was over the Spokane sole-source aquifer. Water table approximately 150 feet deep.

  - No records or manifest were seen on site in the buildings.

EPA EXHIBIT
19 - IDAHO

- Samples were taken by Athena Taken for PCBs Analysis — 2900 — 225479 oil/water, 80 oil/water, 81 oil/water, 82 soil, 83 oil/water — Pool Samples and run Priority Pollutant (PP) Scan

- Tank # 16 & # 17 were found to be approximately 1/3 full of a sludge looking material.

- Tank # 19 was reported by Ken and Athena to be leaking approximately 1 ft off ground through seams.

- Tank trucks in various stages of disrepair were parked in the brush around the site.

- State or IOO was not aware of any SPCC plans for the site.

Office to Coeur d'Alene

- Followed Ken Babin to his office. Warren Bingham was put on notice ot a possible NOV letter.

- Discussed Applicable Laws
  (a) RCRA
  (b) TSCA - PCB
  (c) SDWA - Sole Source
  (d) CWA - SPCC Plan
  (e) Idaho Water Quality Law

BAD O

- RCRA Violations - Company appears to have Interim Status although Alan Pickett signed for Warren Bingham as owner without Bingham's permission or knowledge.

  B. General Facilities Standards
  - 265.12 Notification of change of operators
  - 265.14 Security
  - 265.15 General Inspection requirement
  - 265.16 Personnel Training

C. Preparedness and Prevention

265.31	Equipment internal communication system, fire extinguishers, etc.
265.37	Arrangements with local authorities

D. Contingency Plan and Emergency Procedures

265.51	Contingency plan
265.55	Emergency coordinator
265.56	Emergency procedure

E. Manifest System, Record Keeping, and Reporting

265.71	Use of manifest system
265.73	Operating record
265.74	Availability, retention and disposition of records

Subpart G Closure and Post Closure

265.111	Closure performance standard

Subpart H Financial

265.142	Cost estimates for facility closure
265.143	Financial assurance for facility closure
265.147	Liability requirements

Subpart I Use and Management of Containers

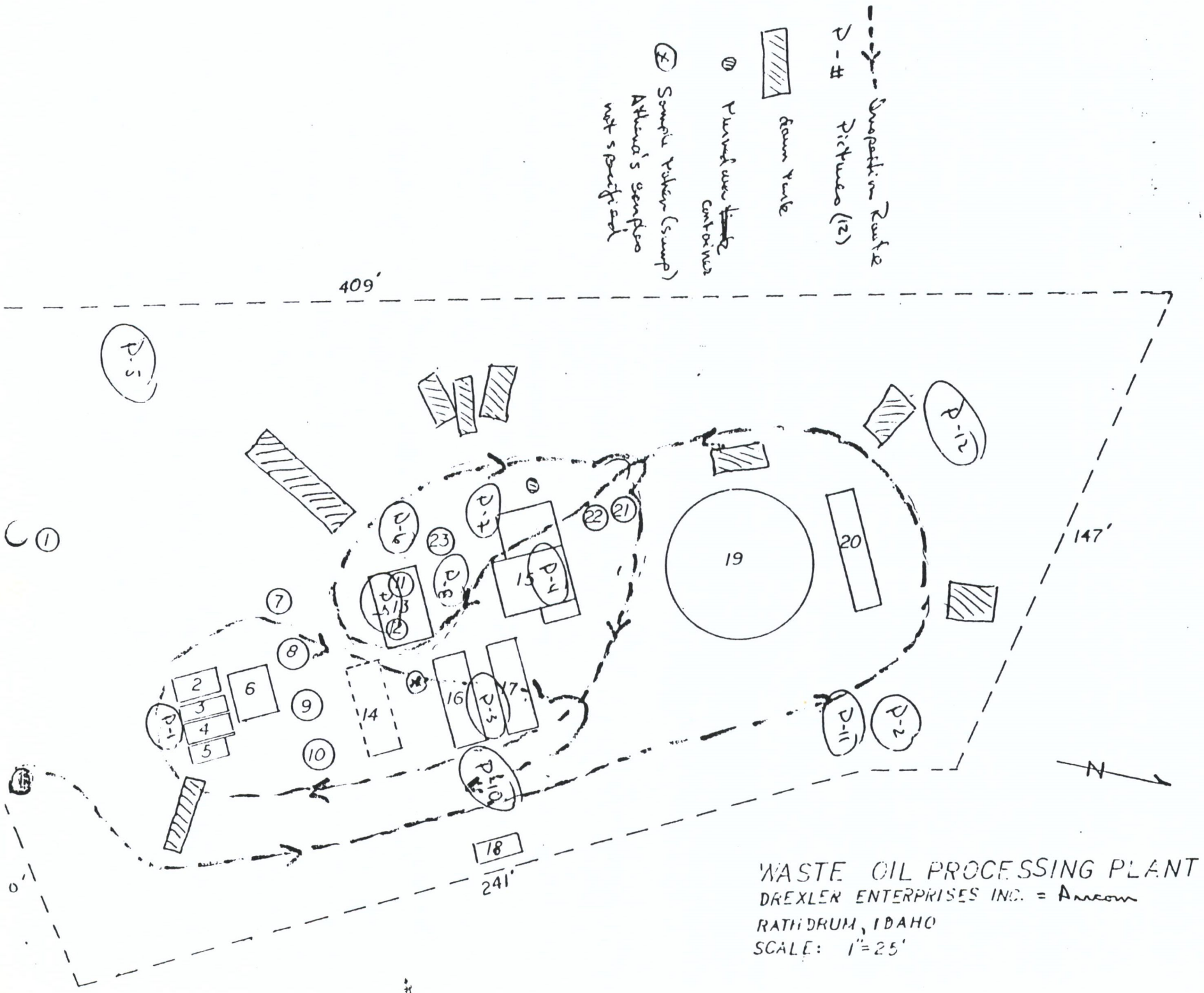
265.173	Management of containers

Subpart J Tanks

265.194	Inspections
265.197	Closure

IDD 00-080-0961

1. Water well
2. T-48 2,000 Gal. Re-refined oil
3. T-23 1,000 Gal. Re-refined oil
4. T-24 1,000 Gal. Re-refined oil
5. T-11 550 Gal. Re-refined oil
6. Electrical storage
7. T-47 2,000 Gal. Water separator
8. T-145 6,000 Gal. Finished oil storage
9. T-120 5,000 Gal. Finished oil storage
10. T-119 5,000 Gal. Finished oil storage
11. T-28 1,200 Gal. Electric heater tank
12. 48" shaker
13. Shaker building
14. T-144 6,000 Gal. Underground finished oil
15. Boiler room with work shop
16. T-142 6,000 Gal. Heater tank with coils
17. T-143 6,000 Gal. Heater tank with coils
18. Truck loading rack
19. T-1071 45,000 Gal. Waste oil storage
20. T-238 10,000 Gal. Waste oil storage
21. U-1 1,200 Gal. Treatment tanks
22. U-2 1,200 Gal. Treatment tanks
23. T-71 3,000 Gal. Fuel storage



TDD 00-080-0961

RCRA TREATMENT, STORAGE AND DISPOSAL FACILITY INSPECTION FORM
FOR TSD FACILITIES ONLY

COMPANY NAME: Arcom, Inc. EPA I.D. Number: IDD 00-080-0961

COMPANY ADDRESS: 5 ME State Line HWY 53, Rathdrum, ID.

COMPANY CONTACT OR OFFICIAL: Warren Bingham

OTHER ENVIRONMENTAL PERMITS HELD BY FACILITY: ___ NPDES ___ AIR ___ OTHER

TITLE: Owner

INSPECTOR'S NAME: Mike Brown DATE OF INSPECTION: 7-20-82

BRANCH/ORGANIZATION: EPA TIME OF DAY INSPECTION TOOK PLACE: AM

Ken Babin
Athena Lalikos
Warren Bingham

1) Is there reason to believe that the facility has hazardous waste on site?

a. If yes, what leads you to believe it is hazardous waste? Check appropriate box:

___ Company admits that its waste is hazardous during the inspection.

___ Company admitted the waste is hazardous in its RCRA notification and/or Part A Permit Application.

___ The waste material is listed in the regulations as a hazardous waste from a nonspecific source (§261.31)

___ The waste material is listed in the regulations as a hazardous waste from a specific source (§261.32)

___ The material or product is listed in the regulations as a discarded commercial chemical product (§261.33)

X EPA testing has shown characteristics of ignitability, corrosivity, reactivity or extraction procedure toxicity, or has revealed hazardous constituents (please attach analysis report)

___ Company is unsure but here is reason to believe that waste materials are hazardous. (Explain)

Samples taken from HW ponded
1,1 trichloethane
ethyl benzene
methyl chloride
toluene

b. Is there reason to believe that there are hazardous wastes on-site which the company claims are merely products or raw materials?

	YES	NO	DON'T KNOW
	X		

Please explain: ↳ Manifests

c. Identify the hazardous wastes by hazardous waste code that are on-site, and estimate approximate quantities of each.

	YES	NO	DON'T KNOW
2) Does the facility generate hazardous waste?		X	
3) Does the facility transport hazardous waste?	X		
4) Does the facility treat, store or dispose of hazardous waste?	X		

Waste oil recycling operation

EPA Exhibit 20 - Idaho

VISUAL OBSERVATIONS

(5) SITE SECURITY (§265.14)	YES	NO	DON'T KNOW
a. Is there a 24-hour surveillance system?		X	
b. Is there a suitable barrier which completely surrounds the active portion of the facility?	X		
c. Are there "Danger-Unauthorized Personnel Keep Out" signs posted at each entrance to the facility?		X	

Fence around the area but no gate

(6) Are there ignitable, reactive or incompatible wastes on site? (§265.27)	X		
a. If "YES", what are the approximate quantities?			
b. If "YES", have precautions been taken to prevent accidential ignition or reaction of ignitable or reactive waste?		X	
c. If "YES", explain → NW			
d. In your opinion, are proper precautions taken so that these wastes do not:			
- generate extreme heat or pressure, fire or explosion, or violent reaction?			
- produce uncontrolled toxic mists, fumes, dusts, or gases in sufficent quantities to threaten human health?			
- produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosions?			
- damage the structural integrity of the device or facility containing the waste?			
- threaten human health or the environment?			

Lab ~~[illegible]~~ analysis revealed that NW was leaking onto the ground

Please explain your answers, and comment if necessary. clean up is needed

e. Are there any additional precautions which you would recommend to improve hazardous waste handling procedures at the facility?

(7) Does the facility comply with preparedness and prevention requirements including maintaining: (§265.32) No No equipment

	YES	NO	DON'T KNOW
- an internal communications or alarm system?		X	
- a telephone or other device to summon emergency assistance from local authorities?		X	← telephone out of order
- portable fire equipment?		X	
- adequate aisle space?		X	
- in your opinion, do the types of wastes on site require all of the above procedures, or are some not needed? Explain.		X	

In your opinion, do the types of wastes on site require all of the above procedures, or are some not needed? Explain.

*(8) Have you inspected to verify that the groundwater monitoring wells (if any) mentioned in the facility's groundwater monitoring plan (see no. 19 below) are properly installed?		N/A	
- If you have, please comment, as appropriate.			
(9) a. Is there any reason to believe that groundwater contamination already exists from this facility? If "YES", explain.			
b. Do you believe that operation of this facility may affect groundwater quality?			
c. If "YES", explain.			

RECORDS INSPECTION

(10) Has the facility received hazardous waste from an off-site source since Nov. 19, 1980 (effective date of the regulations)?		X	→ Records & all manifests impounded by FBI for Grand Jury Investigation
a. If "YES", does it appear that the facility has a copy of a manifest for each hazardous waste load received?			
b. How many post-November 19 manifests does it have? (If the number is large, you may estimate)			
c. Does each manifest (or a representative sample) have the following information?			
- a manifest document number			

	YES	NO	DON'T KNOW
- the generator's name, mailing address, telephone number, and EPA identification number			
- the name, and EPA identification number of each transporter			
- the name, address and EPA identification number of the designated facility and an alternate facility, if any;			
- a DOT description of the wastes			
- the total quantity of each hazardous waste by units of weight or volume, and the type and number of containers as loaded into or onto the transport vehicle			
- a certification that the materials are properly classified, described, packaged, marked, and labeled, and are in proper condition for transportation under regulations of the Department of Transportation and the EPA			
d. Are there any indications that unmanifested hazardous wastes have been received since November 19, 1980? If YES, explain.			
(11) Does the facility have a written waste analysis plan specifying test methods, sampling methods and sampling frequency? (§265.13)		X	
a. Does the character of wastes handled at the facility change from day to day, week to week, etc., thus requiring frequent testing? (You may check more than one) Waste characteristics vary ____ All wastes are basically the same ____ Company treats all waste as hazardous ____ Don't Know ____			
b. Does hazardous waste come to this facility from off-site sources?	X		
c. If waste comes from an off-site source, are there procedures in the plan to insure that wastes received conform to the accompanying manifest?		X	
(12) INSPECTIONS (§265.15)			
a. Does the facility have a written inspection schedule?		X	
b. Does the schedule identify the types of problems to be looked for and the frequency for inspections?			
c. Does the owner/operator record inspections in a log?			
d. Is there evidence that problems reported in the inspection log have not been remedied? If "YES," please explain.			

	YES	NO	DON'T KNOW
(13) PERSONNEL TRAINING (§265.16)			
a. Is there written documentation of the following:			
- job title for each position at the facility related to hazardous waste management and the name of the employee filling each job?			
- type and amount of training to be given to personnel in jobs related to hazardous waste management?			
- actual training or experience received by personnel?			
(14) Does the facility have a written contingency plan for emergency procedures designed to deal with fires, explosion or any unplanned release of hazardous waste? (§265.51)		X	
a. Does the plan describe arrangements made with local authorities?			
b. Has the contingency plan been submitted to local authorities?			
How do you know?			
c. Does the plan list names, addresses, and phone numbers of Emergency Coordinators?			
d. Does the plan have a list of what emergency equipment is available?			
e. Is there a provision for evacuating facility personnel?			
f. Was an Emergency Coordinator present or on call at the time of the inspection?			
(15) Does the owner/operator keep a written operating record with: (§265.73)			
- a description of wastes received with methods and dates of treatment, storage or disposal?		X	
- location and quantity of each waste?			
- detailed records and results of waste analysis and treatability tests performed on wastes coming into the facility?			
- detailed operating summary reports and description of all emergency incidents that required the implementation of the facility contingency plan?			
*(16) Does the facility have written closure and post-closure plans? (§265.110)			
a. Does the written closure plan include:			
- a description of how and when the facility will be partially (if applicable) and ultimately closed?			

* Effective date for this requirement is May 19, 1981.

	YES	NO	DON'T KNOW
- an estimate of the maximum inventory of wastes in storage or treatment at any time during the life of the facility?	___	X	___
- a description of the steps necessary to decontaminate facility equipment during closure?	___	___	___
- a schedule for final closure including the anticipated date when wastes will no longer be received and when final closure will be completed?	___	___	___
b. What is the anticipated date for final closure?	___	___	___
c. Does the owner/operator have a written post-closure plan identifying the activities which will be carried on after closure and the frequency of these activities?	___	___	___
d. Does the written post-closure plan include:			
- a description of planned groundwater monitoring activities and their frequencies during post-closure?	___	N/A	___
- a description of planned maintenance activities and frequencies to ensure integrity of final cover during post-closure?	___	___	___
17) Does the owner/operator have a written estimate of the cost of closing the facility? (§265.142) What is it?	___	X	___
18) Does the owner/operator have a written estimate of the cost for post-closure monitoring and maintenance? What is it? (§265.144)	___	N/A	___
19) Has a groundwater monitoring program been implemented?	___	N/A	___
a. If "yes," has the facility installed 1 upgradient and 3 downgradient monitoring wells?	___	___	___
b. Is there a groundwater sampling and analysis available at the facility?			
c. Does the water sampling and analysis plan include procedures and techniques for:			
- Sample collection	___	___	___
- Sample preservation and shipment	___	___	___
- Analytical procedures	___	___	___
- Chain of custody procedures	___	___	___

	YES	NO	DON'T KNOW
d. Has the facility opted to maintain an alternate groundwater monitoring system?	___	N/A	___
e. If answer is "yes" to "d" above, have they submitted the alternate groundwater monitoring plan to the Regional Administrator per 265.90(d)?	___		___
f. Has the alternate groundwater monitoring plan been certified by a qualified geologist or geotechnical engineer?	___		___
g. Is the facility waiving the groundwater monitoring requirements per §265.90(c)?	___		___
h. If answer is "yes" to "g" above, does the written demonstration appear to meet the requirements of §265.90(c)?	___		___

Pictures were taken

SITE-SPECIFIC

Please circle all appropriate activities and answer questions on indicated pages for all activities circled. When you submit your report, include only those site-specific pages that you have used.

✓ STORAGE	✓ TREATMENT	DISPOSAL
Waste Pile p.9	Tank p.8	Landfill pp.10-11
Surface Impoundment p. 8	Surface impoundment pp. 8-9	Land Treatment pp. 9, 10
Container p.7	Incineration pp. 12-13	Surface Impoundment p.8
Tank, above ground p.8	Thermal Treatment pp. 12-13	Other_____
Tank, below ground p.8	Land Treatment pp. 9-10	

a. can be entered for inspection ____

b. cannot be entered for inspection ____

Other_____

Chemical, Physical and Biological Treatment (other than in tanks, surface impoundment of land treatment facilities) p. 13

Other _____

CONTAINERS (§265.170)	YES	NO	DON'T KNOW
1. Are there any leaking containers? If "YES," explain.	X	X	
2. Are there any containers which appear in danger of leaking? If "YES," explain.	X		
3. Do wastes appear compatible with container materials?	✓		
4. Are all containers closed except those in use?		X	
5. Do containers appear to be opened, handled or stored in a manner which may rupture the containers or cause them to leak?		X	
6. How often does the plant manager claim to inspect container storage areas? _____			
7. Does it appear that incompatible wastes are being stored in close proximity to one another? If "YES," explain.			X
8. Are containers holding ignitable or reactive wastes located at least 15 meters (50 feet) from the facility's property line?	✓		
9. What is the approximate number and size of containers with hazardous wastes?			X

Some containers were overturned & a black sludge like material was leaking out. It is unknown wether the leaking containers had ever.

containers were in bad disrepair & haphazardly placed around the waste management facility.

TANKS (§265.190)	YES	NO	DON'T KNOW	
1. Are there any leaking tanks? If "YES", explain.	X			45,000 gal ~~tube~~ tank was found to be leaking. It is not known whether liquid
2. Are there any tanks which appear in danger of leaking. If "YES", explain.	X			
3. Are wastes or treatment reagents being placed in tanks which could cause them to rupture, leak, corrode or otherwise fail? If "YES", explain.			X	
4. Do uncovered tanks have at least 2 feet of freeboard or an adequate containment structure?	X			
5. Where hazardous waste is continuously fed into a tank, is the tank equipped with a means to stop this inflow?			X	
6. Does it appear that incompatible wastes are being stored in close proximity to one another, or in the same tank? If "YES", explain.			X	
7. How often does the plant manager claim to inspect container storage areas?		X		Plant is not presently in operation
8. Are ignitable or reactive wastes stored in a manner which protects them from a source of ignition or reaction? If "YES", explain.		X		
9. What is the approximate number and size of tanks containing hazardous wastes?			X	Owner did not have a good idea about what was present

SURFACE IMPOUNDMENTS (§265.220)	YES	NO	DON'T KNOW
1. Is there at least 2 feet of freeboard in the impoundment?		N/A	
2. Do all earthen dikes have a protective cover to preserve their structural integrity? If "YES", specify type of covering.			
3. Is there reason to believe that incompatible wastes are being placed in the same surface impoundment? If "YES", explain.			

	YES	NO	DON'T KNOW
4. Are ignitable or reactive wastes being placed in surface impoundments without being treated to remove these characteristics? If "YES", explain.		N/A	
5. Are there any leaks, failures or is there any deteriorization in the impoundments? If "YES", explain.			
6. Give the approximate size of surface impoundments (gallons or cubic feet).			

WASTE PILES (§265.250)

1. Is the waste pile protected from wind erosion?		N/A	
a. Does it appear to need such protection?			
b. Explain what type of protection exists.			
2. Does it appear that incompatible wastes are being stored in the same waste pile? If "YES", explain.			
3. Is leachate run-off from a pile a hazardous waste? If "YES", explain this determination and answer (a) and (b) below.			
a. Is the pile placed on an impermeable base that is compatible with the waste?			
b. Is the pile protected from precipitation and run-on?			
4. In your judgment, are ignitable or reactive wastes managed in such a way that they are protected from any material or conditions which may cause them to ignite? Please explain or indicate if no such wastes are present.			
Are they placed on an existing pile so that they no longer meet the definition of ignitable or reactive waste? Please explain.			
5. How many waste piles are on site, and approximately how large are they?			

LAND TREATMENT (§265.270)

1. Can the facility operator demonstrate that the hazardous waste has been made less or non-hazardous by biological degradation or chemical reactions occurring in or on the soil? Please explain.		N/A	

	YES	NO	DON'T KNOW
*2. Is run-on diverted away from the active portions of the land treatment facility?		N/A	
*3. Is run-off collected?			
4. Are food chain crops being grown on the facility property?			
a. If "YES", can the facility operator document that arsenic, lead and mercury:			
- will not be transferred to the crop or ingested by food chain animals or			
- will not occur in greater concentrations in the crops grown on the land treatment facility than in the same crops grown on untreated soils.			
b. Has notification of the growing of the food chain crops been made to the Regional Administrator?			
5. Is there a written and implemented plan for unsaturated zone monitoring?			
6. Are there records of the application dates, application rates, quantities and location of each hazardous waste placed in the facility?			
7. Do the closure and post-closure plans address:			
a. control of migration of hazardous wastes into the groundwater?			
b. control of run-off, release of airborne particulate contaminants?			
c. compliance with requirements for the growth of food-chain crops (if they are present)?			
8. Is ignitable or reactive waste immediately incorporated into the soil so the resulting waste no longer meets that definition? If "YES", explain.			
9. Are incompatible wastes placed in the same land treatment area? If "YES", explain.			
10. What is the area of the land receiving hazardous waste treatment?			

LANDFILLS (§265.300)

†1. Is run-on diverted away from the active portions of the landfill?		N/A	
†2. Is run-off from active portions of the landfill collected?			

* Effective date for these requirements is May 19, 1981.

† These requirements are effective November 19, 1981.

	YES	NO	DON'T KNOW
3. Is waste which is subject to wind dispersal controlled? Explain.		U/A	
4. Does the owner/operator maintain a map with:			
- the exact location and dimensions of each cell			
- the contents of each cell and approximate location of each hazardous waste type			
5. Do the closure and post-closure plans address:			
- control of pollutant migration via ground water?			
- control of surface water infiltration?			
- prevention of erosion?			
6. Is ignitable or reactive waste treated before being placed in the landfill? Explain how you know.			
7. Are precautions taken to insure that incompatible wastes are not placed in the same landfill cell? If "NO", explain.			
8. Are bulk or non-containerized wastes containing free liquids placed in the landfill? If "YES",			
a. Does the landfill have a liner which is chemically and physically resistant to the added liquid?			
b. Is the waste treated and stabilized so that free liquids are no longer present?			
*9. Are containers holding liquid waste or waste containing free liquids placed in the landfill?			
10. Are empty containers (e.g. those containing less than 1/2 inch of liquid) placed in the landfills?			
If so, are they crushed flat, shredded or similarly reduced in volume before they are buried?			

11. What is the approximate area of the hazardous waste landfill?

---

* Effective date for this requirement is November 19, 1981.

INCINERATORS AND THERMAL TREATMENT
(§§265.340 and 265.379)

	YES	NO	DON'T KNOW
1. What type of incinerator or thermal treatment is at the site (e.g. waterwall incinerator, boiler, fluidized bed, etc.)?			
2. Was hazardous waste being incinerated or thermally treated during your inspection? If "YES", answer all following questions. If "NO", answer only questions 3 and 7.		N/A	
3. Has waste analysis been performed (and written records kept) to include:			
- heating value of the waste			
- halogen content			
- sulfur content			
- concentration of lead			
- concentration of mercury			

NOTE: Waste analysis need not be performed on each waste load if if there are documented data available to show waste characteristics that do not vary. If there are such documented data available, check here [ ].

4. Does it appear that the owner/operator brings his thermal treatment process to steady state (normal) conditions of operation before introducing hazardous wastes?			
5. Did it appear during your inspection that there was adequate monitoring and inspection by owner/operator every 15 minutes during hazardous waste incineration for:			
- waste feed			
- auxiliary fuel feed			
- air flow			
- incinerator temperature			
- scrubber flow			
- scrubber pH			
- relevant level controls			
Every hour for:			
- stack plume (color and opacity)			
6. Is there open burning of hazardous waste?			

a. If "YES", what is being burned? (only burning or detonation of explosives is permitted)

b. If open burning or detonation of explosives is taking place, approximately what is the distance from the open burning or detonation to the property of others?

	YES	NO	DON'T KNOW
		N/A	
6. Does the incinerator appear to be operating properly? (Do emergency shutdown controls and system alarms seem to be in good working order?) Please explain.	___	___	___
a. Is there any evidence of fugitive emissions?	___	___	___
7. Is the residue from the incinerator treated by the owner as a hazardous waste? Please explain.	___	___	___
8. What types of air pollution control devices (if any) are installed on the incinerator?			

CHEMICAL, PHYSICAL AND BIOLOGICAL TREATMENT (§265.400)

1. Does the treatment process system show any signs of ruptures, leaks, or corrosion? Please explain.	___	___	___
2. Is there a means to stop the inflow of continuously-fed hazardous wastes?	___	___	___
3. Is there ignitable or reactive waste fed into the treatment system?	___	___	___
If "YES", has it been treated or protected from any material or conditions which may cause it to ignite or react? If so, explain how.	___	___	___
Are the incompatible wastes placed in the same treatment process? If "YES", explain.	___	___	___

5. Describe the treatment system at this facility.

COLLECTION RE[illegible] [illegible]SCA/CWA [illegible]

3. DATE COLLECT	4. PROJ CODE	5. [illegible]SION NO.	6. INSP NO.	7. REGISTRATION NO.	8. ESTABLISHMENT NO.
07-20-82	-	10	011	-	-

9. DATE(S) SHIPPED: N/A

10. FLAG: Possibly PCB contaminated/Hazardous Waste

11. PRODUCT IDENTIFICATION (Name, Brand, Q.C. Statement, Active Ingredients, Firm Name and Address, etc.)

(POOLING OF PETROLEUM MIXTURE) Within containment housing 'finished oil storage holding tank. (See photo)

Arrcom/Drexler
Rathdrum, Idaho 83858

12a. PRODUCER ESTABLISHMENT: Arrcom/Drexler (IDD 00-800-9961)

b. STREET ADDRESS	c. CITY	d. STATE	e. ZIP CODE
Highway 53	Rathdrum	Idaho	83858

13a. SHIPPER: Same

b. STREET ADDRESS	c. CITY	d. STATE	e. ZIP CODE

14a. DEALER: Arrcom/Drexler (IDD 00-800-9961)

b. STREET ADDRESS	c. CITY	d. STATE	e. ZIP CODE
Highway 53	Rathdrum	Idaho	83858

15. RECORDS AND SAMPLE SENT TO (Specify Location)

a. [illegible]	b. [illegible]	c. SAMPLE
Seattle	Boise	Manchester

d. SAMPLE DELIVERED TO	e. DATE	f. B/L NO.
Manchester Lab via Garrett Freightlines	07-30-82	240-347095 6

16. LOT OR CODE NOS.: -

17. AMOUNT BEFORE SAMPLING: not known

18. DESCRIPTION OF SAMPLE AND METHOD OF COLLECTION: Scooped 1/1 40 ml glass vial into pooling of petroleum mixture on surface of ground.

19. SAMPLE PREPARED IN THE FOLLOWING MANNER: Idt sample "225479 07-20-82 AKL" Polybagged, Sealed with EPA seal idt "225479 07-20-82 ATHENA K LALIKOS"

20. RELATED SAMPLES COLLECTED FROM SAME SHIPMENT OR AT THE SAME PRODUCER ESTABLISHMENT: 225480, 81, 82, 225483.

21. REASON FOR COLLECTION: Possibly contaminated w/ PCBs. To undergo Priority Pollutant Scan/CWA

22. NOTICE OF INSPECTION ISSUED: X

23. RECEIPT FOR SAMPLES ISSUED: X

24. REMARKS: Displayed credentials to owner of property Mr. Warren Bingham.
N/C was not signed by Bingham who felt he needed legal advice on disposition.
Polaroid attd of sampling point.
Samples 225479, 225480, 225481 should be 'pooled' after being analyzed for PCBs — to undergo a priority pollutant scan. (See Mike Brown, Seattle, x2852)
Schematic with legend attd of site.
Chain of Custody enclosed within sample package.

25. $ - C ☐ V ☐ P ☐

26. COLLECTION STA: Boise

27. COLLECTOR'S NAME (Z) AND SIGNATURE: Athena K. Lalikos

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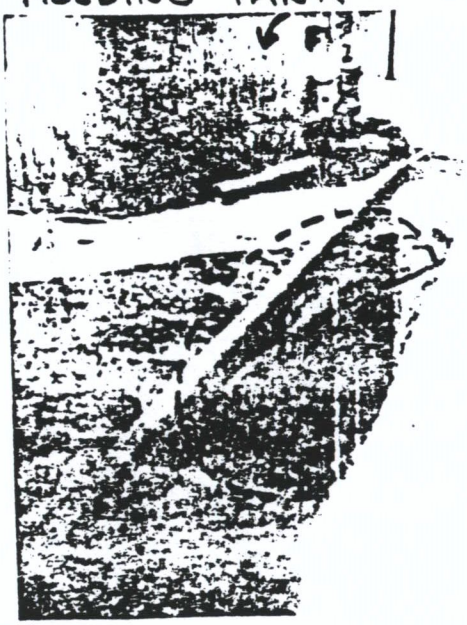
EPA EXHIBIT 21-IDAHO

HOLDING TANK



225479 07-20-82 AKL

ARRCOM / DREXLER
RATHDRUM, IDAHO

ENVIRONMENTAL PROTECTION AGENCY
COLLECTION REPORT

1. TYPE SAMPLE	2. SAMPLE
TSCA/CWA	225481

3. DATE COLLECT	4. PROJ CODE	5. REGION NO.	6. INSP NO.	7. REGISTRATION NO.	8. ESTABLISHMENT NO.
07-20-82	-	10	011	-	-

9. DATE(S) SHIPPED	10. FLAG
N/A	Possibly PCB contaminated/Hazardous Waste

11. PRODUCT IDENTIFICATION (Name, Brand, O.C. Statement, Active Ingredients, Firm Name and Address, etc.)

(POOLING OF PETROLEUM MIXTURE) In general area of oil storage holding tank. (See photo)
Arrcom/Drexler
Rathdrum, Idaho 83858

12a. PRODUCER ESTABLISHMENT
Arrcom/Drexler (IDD 00-800-9961)

b. STREET ADDRESS	c. CITY	d. STATE	e. ZIP CODE
Highway 53	Rathdrum	Idaho	83858

13a. SHIPPER
Same

b. STREET ADDRESS	c. CITY	d. STATE	e. ZIP CODE

14a. DEALER
Arrcom/Drexler (IDD 00-800-9961)

b. STREET ADDRESS	c. CITY	d. STATE	e. ZIP CODE
Highway 53	Rathdrum	Idaho	83858

15. RECORDS AND SAMPLE SENT TO (Check boxes)

a. ORIGINAL RECORDS	b. PRODUCING REGION COPY	c. SAMPLE
Seattle	Boise	Manchester

d. SAMPLE DELIVERED TO	e. DATE	f. B/L NO.
Manchester Lab via Garrett Freightlines	07-30-82	240-347095 6

16. LOT OR CODE NOS.
-

17. AMOUNT BEFORE SAMPLING
not known

18. DESCRIPTION OF SAMPLE AND METHOD OF COLLECTION
Scooped 1/1 40 ml glass vial into pooling of petroleum mixture on surface of ground.

19. SAMPLE PREPARED IN THE FOLLOWING MANNER
Idt sample "225481 07-20-82 ATL" Polybagged, sealed with EPA seal idt "225481 07-20-82 ATHENA K LALIKOS"

20. RELATED SAMPLES COLLECTED FROM SAME SHIPMENT OR AT THE SAME PRODUCER ESTABLISHMENT
225479, 80, 82, 225483

21. REASON FOR COLLECTION
Possibly contaminated w/ PCBs. To undergo Priority Pollutant Scan/EMA

22. NOTICE OF INSPECTION ISSUED X 23. RECEIPT FOR SAMPLES ISSUED X

24. REMARKS
Displayed credentials to owner of property Mr. Marron Bingham.
N/C was not signed by Bingham who felt he needed legal advice on disposition.
Polaroid attd of sampling point.

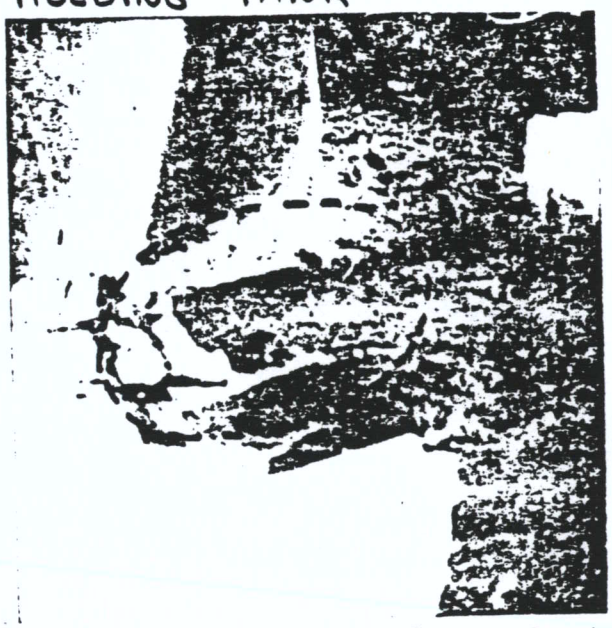
Samples 225479, 225480, 225481 should be 'pooled' after being analyzed for PCBs -- to undergo a priority pollutant scan (see Mike Brown, Seattle, x2852)

Schematic with legend attd of site.
Chain of custody enclosed within sample package.

25.	C	V	B	26. COLLECTION STA	27. COLLECTOR'S NAME (Type) AND SIGNATURE
S -	☐	☐	☐	Boise	ATHENA K LALIKOS Athena K Lalikos

EPA Form 3540-7 (Rev. 3-77) PREVIOUS EDITION IS OBSOLETE.

HOLDING TANK



225481 07-20-82 AKL

ARRCOM / DREXLER
RATHDRUM, IDAHO

ENVIRONMENTAL PROTECTION AGENCY
COLLECTION REPORT

TYPE SAMPLE: TSCA/CWA

SAMPLE: 225-80

3. DATE COLLECTED	4. PROJ CODE	5. REGION NO.	6. INSP NO.	7. REGISTRATION NO.	8. ESTABLISHMENT NO.
07-30-82	-	10	011	-	-

9. DATE(S) SHIPPED: N/A

10. FLAG: Possibly PCB contaminated/Hazardous Waste

11. PRODUCT IDENTIFICATION (Name, Brand, S.C. Statement, Active Ingredient, Firm Name and Address, etc.)

(POOLING OF PETROLEUM MIXTURE) South side of building housing 'shaker' and spigot.
(See photo)
Arrcom/Drexler
Rathdrum, Idaho 83858

12a. PRODUCER ESTABLISHMENT: Arrcom/Drexler (IDD 00-800-9961)

b. STREET ADDRESS	c. CITY	d. STATE	e. ZIP CODE
Highway 53	Rathdrum	Idaho	83858

13a. SHIPPER: Same

b. STREET ADDRESS	c. CITY	d. STATE	e. ZIP CODE

14a. DEALER: Arrcom/Drexler (IDD 00-800-9961)

b. STREET ADDRESS	c. CITY	d. STATE	e. ZIP CODE
Highway 53	Rathdrum	Idaho	83858

15. RECORDS AND SAMPLE SENT TO

a. ORIGINAL RECORDS	b. PRODUCER'S ESTABLISHMENT	c. SAMPLE
Seattle	Boise	Manchester
d. SAMPLE DELIVERED TO	e. DATE	f. REF NO.
Manchester Labvia Garrett Freightlines	07-30-82	240-3479,5 6

16. LOT OR CODE NOS.: -

17. AMOUNT BEFORE SAMPLING: not known

18. DESCRIPTION OF SAMPLE AND METHOD OF COLLECTION

Scooped 1/1 40 ml glass vial into pooling of petroleum mixture on surface of ground.

19. SAMPLE PREPARED IN THE FOLLOWING MANNER

Idt sample"225480 07-20-82 AKL" Polybagged, Sealed with EPA seal idt "225480 07-20-82 ATHENA K. LALIKOS"

20. RELATED SAMPLES COLLECTED FROM SAME SHIPMENT OR AT THE SAME PRODUCER ESTABLISHMENT

225479, 81, 82, 225483.

21. REASON FOR COLLECTION

Possibly contaminated w/ PCBs. To undergo Priority Pollutant Scan/CWA.

22. NOTICE OF INSPECTION ISSUED: X

23. RECEIPT FOR SAMPLES ISSUED: X

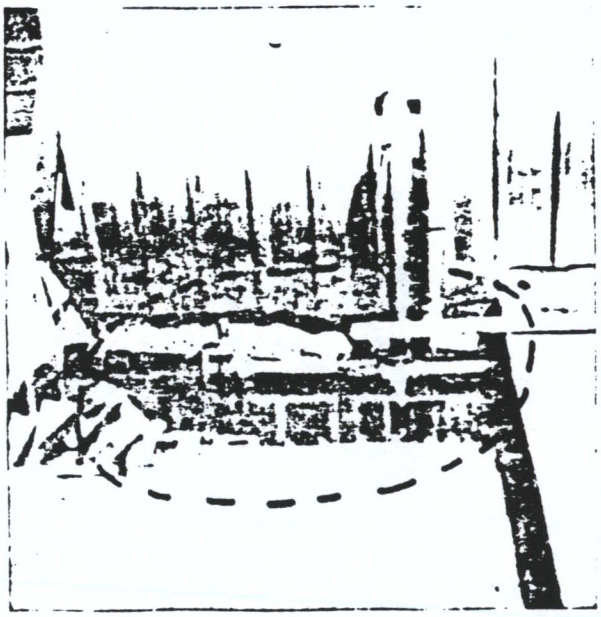
24. REMARKS

Displayed credentials to owner of property Mr. Warren Bingham.
N/C was not signed by Bingham who felt he needed legal advice on disposition.
Polaroid attd of sampling point.

Samples 225479, 225480, 225481 should be 'pooled' after being analyzed for PCBs — to undergo a priority pollutant scan. (See Mike Brown, Seattle, x2852)
Schematic with legend attd of site.
Chain of Custody enclosed within sample package.

25.	C	S	B	26. COLLECTION STA	27. COLLECTOR'S NAME (Typed) AND SIGNATURE
$-	☐	☐	☐	Boise	ATHENA K LALIKOS Athena K Lalikos

EPA Form 3540-7 (Rev. 3-77) PREVIOUS EDITION IS OBSOLETE.



225480 07-20-82 AKL
BLDG HOUSING 'SHAKER'
ARRCOM / DREXLER
RATHDRUM, IDAHO

ENVIRONMENTAL PROTECTION AGENCY
COLLECTION REPORT

1. TYPE SAMPLE	2. SAMPLE
TSCA/CWA	225482

3. DATE COLLECT	4. PROJ CODE	5. REGION NO.	6. INSP NO.	7. REGISTRATION NO.	8. ESTABLISHMENT NO.
07-20-82	-	10	011	-	-

9. DATE(S) SHIPPED: N/A

10. FLAG: Possibly PCB contaminated/Hazardous Waste

11. PRODUCT IDENTIFICATION (Name, Brand, Q.C. Statement, Active Ingredients, Firm Name and Address, etc.)

(SOIL UNDER TRUCK LOADING RACK) 1/1 glass pint soil
(See photo)

Arrcom/Drexler
Rathdrum, Idaho 83858

12a. PRODUCER ESTABLISHMENT: Arrcom/Drexler (IDD 00-800-9961)

b. STREET ADDRESS	c. CITY	d. STATE	e. ZIP CODE
Highway 53	Rathdrum	Idaho	83858

13a. SHIPPER: Same

b. STREET ADDRESS	c. CITY	d. STATE	e. ZIP CODE

14a. DEALER: Arrcom/Drexler (IDD 00-800-9961)

b. STREET ADDRESS	c. CITY	d. STATE	e. ZIP CODE
Highway 53	Rathdrum	Idaho	83858

15. RECORDS AND SAMPLE SENT TO (Specify locations)

a. ORIGINAL RECORDS	b. PRODUCING REGION COPY	c. SAMPLE
Seattle	Boise	Manchester

d. SAMPLE DELIVERED TO	e. DATE	f. B/L NO.
Manchester Lab via Garrett Freightlines	07-30-82	240-347095 6

16. LOT OR CODE NOS.: -

17. AMOUNT BEFORE SAMPLING: Not known

18. DESCRIPTION OF SAMPLE AND METHOD OF COLLECTION

Scooped contaminated soil into 1/1 pint glass open mouth jar using jar as a digging device.

19. SAMPLE PREPARED IN THE FOLLOWING MANNER

Idt jar "225482 07-20-82 AKL" Polybagged, Sealed with EPA seal idt "225482 07-20-82 ATHENA K. Lalikos"

20. RELATED SAMPLES COLLECTED FROM SAME SHIPMENT OR AT THE SAME PRODUCER ESTABLISHMENT

225479, 80, 81, 225483.

21. REASON FOR COLLECTION

Possibly contaminated w/ PCBs. To undergo Priority Pollutant Scan/CWA

22. NOTICE OF INSPECTION ISSUED: X

23. RECEIPT FOR SAMPLES ISSUED: X

24. REMARKS

Displayed credentials to owner of property Mr. Warren Bingham.
N/C not signed by Bingham who felt he needed legal advice on disposition.
Polaroid attd of sampling point.

Schematic with legend attd of site.
Chain of Custody enclosed within sample package.

25.	C	V	B	26. COLLECTION STA	27. COLLECTOR'S NAME (Type) AND SIGNATURE
5	☐	☐	☐	Boise	ATHENA K. LALIKOS Athena K. Lalikos

EPA Form 3540-7 (Rev. 3-77)

PREVIOUS EDITION IS OBSOLETE.

SAMPLE RECORD COPY

225482 07-20-82 AKL

UNDER LOADING PLATFORM
ARRCOM / DREXLER
RATHDRUM, IDAHO

ENVIRONMENTAL PROTECTION AGENCY
COLLECTION REPORT

12. TYPE SAMPLE: TSCA/CWA

1. SAMPLE: 225483

3. DATE COLLECTED	4. PROJ CODE	5. REGION NO.	6. INSP NO.	7. REGISTRATION NO.	8. ESTABLISHMENT NO.
07-20-82	-	10	011	-	-

9. DATE(S) SHIPPED	10. FLAG
N/A	Possibly PCB contaminated/Hazardous Waste

11. PRODUCT IDENTIFICATION (Name, Brand, O.C. Statement, Active Ingredients, Firm Name and Address, etc.)

(SUMP) 1/1 pint oil

Arrcom/Drexler
Rathdrum, Idaho 83858

12a. PRODUCER ESTABLISHMENT: Arrcom/Drexler (IDD 00-800-9961)

b. STREET ADDRESS	c. CITY	d. STATE	e. ZIP CODE
Highway 53	Rathdrum	Idaho	83858

13a. SHIPPER: Same

b. STREET ADDRESS	c. CITY	d. STATE	e. ZIP CODE

14a. DEALER: Arrcom/Drexler (IDD 00-800-9961)

b. STREET ADDRESS	c. CITY	d. STATE	e. ZIP CODE
Highway 53	Rathdrum	Idaho	83858

15. RECORDS AND SAMPLE SENT TO (Specify Laboratory)

a. ORIGINAL RECORDS	b. PRODUCING REGION COPY	c. SAMPLE
Seattle	Boise	Manchester
d. SAMPLE DELIVERED TO	e. DATE	f. B/L NO.
Manchester Lab via Garrett Freightlines	07-30-82	240-347095 6

16. LOT OR CODE NOS.
-

17. AMOUNT BEFORE SAMPLING
Not known

18. DESCRIPTION OF SAMPLE AND METHOD OF COLLECTION
Mike Brown reached down and retrieved sample in a 1/1 pint sample glass jar.

19. SAMPLE PREPARED IN THE FOLLOWING MANNER
Sample idt "225483 07-20-82 MB" Polybagged, Sealed with EPA seal idt "225483 07-20-82 ATHENA K LALIKOS"

20. RELATED SAMPLES COLLECTED FROM SAME SHIPMENT OR AT THE SAME PRODUCER ESTABLISHMENT
225479, 80, 81, 225482.

21. REASON FOR COLLECTION
Possibly contaminated w/ PCBs. To undergo Priority Pollutant Scan/CWA

22. NOTICE OF INSPECTION ISSUED: X

23. RECEIPT FOR SAMPLES ISSUED: X

24. REMARKS
Displayed credentials to owner of property Mr. Warren Bingham.
W/C not signed by Bingham who felt he needed legal advice on disposition.

Schematic with legend attd of site.
Chain of Custody enclosed within sample package.
Sample to be analyzed under the CWA/Priority Pollutant Scan, - first, then if need be under TSCA.

25.	C	V	B	26. COLLECTION STA	27. COLLECTOR'S NAME (Type) AND SIGNATURE
S -	☐	☐	☐	Boise	ATHENA K LALIKOS Athena K. Lalikos

EPA Form 3540-7 (Rev. 3-77) PREVIOUS EDITION IS OBSOLETE.

SAMPLE RECEIVED COPY

TENTATIVELY IDENTIFIED COMPOUNDS

PROJECT: EPA Idaho COMPILED BY: JM Blazevich DATE: 8-25-82

LABORATORY: EPA Region X REVIEWED BY: WB. DATE: 8-26-82

ACID / BN FRACTION SAMPLE # :	composite of 29000, 29001 and 29002					29004		
CAS # NAME	4/114					3/113		
1. 100-41-4 Ethylbenzene	+					+		
2. 108-38-3 meta Xylene	+					+		
3. 696-29-7 (1-methylethyl)-cyclohexane	+					—		
4. 1795-16-0 decyl-cyclohexane	+					+		
5.								
6.								
7.								
8.								
9. RIC shows evidence of Lub oil in sample	+					+		
10.								

EPA EXHIBIT
22-IDAHO

ACID COMPOUNDS

PROJECT: EPA Idaho COMPILED BY: J M Blazevich DATE: 8-25-82

LABORATORY: EPA Region X REVIEWED BY: AB DATE: 8-27-82

SAMPLE # :	Composite 29000, 29001 and 29002					29004		
UNITS :	ug/l					ug/Kg		
LOQ :								
1. 2,4,6-trichlorophenol	6000u					26000u		
2. p-chloro-m-cresol	2000u					11000u		
3. 2-chlorophenol	880u					380au		
4. 2,4-dichlorophenol	2400u					11000u		
5. 2,4-dimethyl phenol	4500u					20000u		
6. 2-nitrophenol	7500u					33000u		
7. 4-nitrophenol	48000u					210000u		
8. 2,4-dinitrophenol	57000u					250000u		
9. 4,6-dinitro-o-cresol	19000u					84000u		
10. pentachlorophenol	57000u					250000u		
11. phenol	880u					340au		

BASE/NEUTRAL COMPOUNDS (continued)

PROJECT: EPA-Idaho COMPILED BY: J M Blazevich DATE: 8-25-82

LABORATORY: EPA Region X REVIEWED BY: [illegible] DATE: 8-27-82

	SAMPLE # :	composite 29000, 29001 and 29002					29004	
	UNITS :	ug/L					ug/Kg	
	LOQ :							
39.	acenaphthylene	400u					1800u	
40.	anthracene / phenanthrene	14000					37000	
41.	benzo(ghi)perylene	4400u					19000u	
42.	fluorene	880u					3900u	
43.	~~phenanthrene~~	—					—	
44.	dibenzo(a,h)anthracene	80000u					350000u	
45.	ideno(1,2,3-cd)pyrene	70000u					310000u	
46.	pyrene	880u					3900u	
47.	TCDD	ND					ND	

BASE/NEUTRAL COMPOUNDS (continued)

PROJECT: EPA-Idaho COMPILED BY: J M Blizzard DATE: 8-25-82

LABORATORY: EPA Region X REVIEWED BY: [illegible] DATE: 8-27-82

SAMPLE # :	composite of 29000, 29001 and 29002				29004	
UNITS :	ug/l				ug/Kg	
LOQ :						
17. 4-bromophenyl phenyl ether	3080u				14000u	
18. bis(2-chloroisopropyl) ether	440u				1900u	
19. bis(2-chloroethoxy) methane	1300u				5700u	
20. hexachlorobutadiene	1800u				7900u	
21. hexachlorocyclopentadiene	35000u				150,000u	
22. isophorone	440u				1900u	
23. napthalene	300u				1300u	
24. nitrobenzene	1800u				7900u	
25. N-nitrosodimethylamine	880u				3900u	
26. N-nitrosodiphenylamine	1300u				5700u	
27. N-nitrosodi-n-propylamine	1800u				7900u	
28. bis(2-ethyl hexyl) phthalate	1320u				5800u	
29. butyl benzyl phthalate	2200u				9700u	
30. di-n-butyl phthalate	260u				1100u	
31. di-n-octyl phthalate	2200u				9700u	
32. diethyl phthalate	440u				1900u	
33. dimethyl phthalate	440u				1900u	
34. benzo(a)anthracene	4400u				190,000u	
35. benzo(a)pyrene	13000u				57000u	
36. 3,4-benzofluroanthene	3500u				15000u	
37. benzo(k)fluoranthene	3500u				15000u	
38. chrysene	4400u				19000u	

BASE/NEUTRAL COMPOUNDS

PROJECT: EPA Idaho COMPILED BY: JM Blazevich DATE: 8-25-82

LABORATORY: EPA Region X REVIEWED BY: [illegible] DATE: 5-27-82

SAMPLE # :	Composite of 29000, 29001 and 29002					29004		
UNITS :	ug/l					ug/kg		
LOQ :								
1. acenaphthene	880u					3900u		
2. benzidine	6600u					290,000u		
3. 1,2,4-trichlorobenzene	1320u					5900u		
4. hexachlorobenzene	2200u					9700u		
5. hexachloroethane	1760u					7700u		
6. bis(2-chloroethyl) ether	880u					3900u		
7. 2-chloronapthalene	880u					3900u		
8. 1,2-dichlorobenzene	440u					1900u		
9. 1,3-dichlorobenzene	440u					1900u		
10. 1,4-dichlorobenzene	440u					1900u		
11. 3,3'-dichlorobenzidine	2200u					9700u		
12. 2,4-dinitrotoluene	6600u					29000u		
13. 2,6-dinitrotoluene	6600u					29000u		
14. 1,2-diphenylhydrazine (as azobenzene)	440u					1900u		
15. fluroanthene	880u					3900u		
16. 4-chlorophenyl phenyl ether	880u					3900u		

TENTATIVELY IDENTIFIED COMPOUNDS

PROJECT: Idaho-EPA COMPILED BY: JM Blizzard DATE: 8-25-82

LABORATORY: EPA Region X REVIEWED BY: ASG DATE: 8-25-82

VOA FRACTION:	SAMPLE # :	29000	29001	29002					
CAS #	NAME	3/4	8/12	0/0					
1. 67-64-1	acetone	+	+	ND					
2. 78-93-3	2-butanone	+	+	↓					
3. 108-10-1	4-methyl-2-pentanone	+	+	↓					
4. 123-72-8	butanal	ND	+	↓					
5. 141-78-6	Acetic Acid, Ethyl Ester	↓	+	↓					
6. 123-86-4	butyl ester of acetic acid	↓	+	↓					
7. —	xylene	↓	+	↓					
8.									
9.									
10.									

VOLATILES(Continued)

PROJECT: Idaho-EPA COMPILED BY: J M Blazevich DATE: 8-25-82

LABORATORY: EPA Region X REVIEWED BY: ARB DATE: 8-25-82

SAMPLE # :	29000	29001	29002					
UNITS :	ug/l	ug/l	ug/l					
LOQ :								
23. dichlorobromomethane	20u	20u	20u					
24. trichlorofluoromethane	↓	↓	↓					
25. dichlorodifluoromethane	↓	↓	↓					
26. chlorodibromomethane	↓	↓	↓					
27. tetrachloroethylene	↓	↓	↓					
28. toluene	20m	180	↓					
29. trichloroethylene	20u	20m	↓					
30. vinyl chloride	↓	20u	↓					

VOLATILES

PROJECT: Idaho-EPA COMPILED BY: JM Blazevich DATE: 8-25-82

LABORATORY: EPA Region X REVIEWED BY: [illegible] DATE: 8-25-82

SAMPLE # :	29000	29001	29002
UNITS :	ug/l	ug/l	ug/l
LOQ :			
1. acrolein	100u	100u	100u
2. acrylonitrile	50u	50u	50u
3. benzene	20u	20u	20u
4. carbon tetrachloride			
5. chlorobenzene			
6. 1,2-dichloroethane			
7. 1,1,1-trichloroethane	20M	36	
8. 1,1-dichloroethane	20u	20u	
9. 1,1,2-trichloroethane			
10. 1,1,2,2-tetrachloroethane			
11. chloroethane			
12. 2-chloroethylvinyl ether			
13. chloroform	20M	20M	
14. 1,1-dichloroethylene	20u	20u	
15. 1,2-trans-dichloroethylene			
16. 1,2-dichloropropane			
17. 1,3-dichloropropylene			
18. ethylbenzene		190	
19. methylene chloride	1100	68	
20 methyl chloride	20u	20u	
21. methyl bromide			
22. bromoform			

TENTATIVELY IDENTIFIED COMPOUNDS

PROJECT: EPA Idaho COMPILED BY: JM Blazevich DATE: 8-25-82

LABORATORY: EPA Region X REVIEWED BY: GNS DATE: 8-26-82

ACID / BN FRACTION SAMPLE # :	composite of 29000, 29001 and 29002					29004		
CAS # NAME	4/114					3/113		
1. 100-41-4 Ethylbenzene	+					+		
2. 108-38-3 meta Xylene	+					+		
3. 696-29-7 (1-methylethyl)-cyclohexane	+					−		
4. 1795-16-0 decyl-cyclohexane	+					+		
5.								
6.								
7.								
8.								
9. RIC shows evidence of Lub oil in sample	+					+		
10.								

ACID COMPOUNDS

PROJECT: EPA Idaho COMPILED BY: J M Blazevich DATE: 8-25-82

LABORATORY: EPA Region X REVIEWED BY: JB DATE: 8-27-82

SAMPLE # :	composite 29000, 29001 and 29002				29004	
UNITS :	ug/l				ug/Kg	
LOQ :						
1. 2,4,6-trichlorophenol	6000u				26000u	
2. p-chloro-m-cresol	2000u				11000u	
3. 2-chlorophenol	880u				3800u	
4. 2,4-dichlorophenol	2400u				11000u	
5. 2,4-dimethyl phenol	4500u				20000u	
6. 2-nitrophenol	7500u				33000u	
7. 4-nitrophenol	48000u				210000u	
8. 2,4-dinitrophenol	57000u				250000u	
9. 4,6-dinitro-o-cresol	19000u				84000u	
x 10. pentachlorophenol	57000u				250000u	
11. phenol	880u				3900u	

BASE/NEUTRAL COMPOUNDS (continued)

PROJECT: EPA-Idaho COMPILED BY: J M Blazevich DATE: 8-25-82

LABORATORY: EPA Region X REVIEWED BY: [illegible] DATE: 8-27-82

SAMPLE # :	composite 29000	29001	29004
UNITS :	ug/l	and 29002	ug/Kg
LOQ :			
39. acenaphthylene	400u		1800u
40. anthracene / phenanthrene	(14000)		(37000)
41. benzo(ghi)perylene	4400u		19000u
42. fluorene	880u		3900u
43. ~~phenanthrene~~	—		—
44. dibenzo(a,h)anthracene	80000u		350000u
45. ideno(1,2,3-cd)pyrene	70000u		310000u
46. pyrene	880u		3900u
47. TCDD	ND		ND

BASE/NEUTRAL COMPOUNDS (continued)

PROJECT: EPA-Idaho COMPILED BY: J M Blaquera DATE: 8-25-82

LABORATORY: EPA Region X REVIEWED BY: [illegible] DATE: 8-27-82

SAMPLE # :	composited 29000, 29001 and 29002				29004	
UNITS :	ug/l				ug/kg	
LOQ :						
17. 4-bromophenyl phenyl ether	3080u				14000u	
18. bis(2-chloroisopropyl) ether	440u				1900u	
19. bis(2-chloroethoxy) methane	1300u				5700u	
20. hexachlorobutadiene	1800u				7900u	
21. hexachlorocyclopentadiene	35000u				150,000u	
22. isophorone	440u				1900u	
23. napthalene	300u				1300u	
24. nitrobenzene	1800u				7900u	
25. N-nitrosodimethylamine	880u				3900u	
26. N-nitrosodiphenylamine	1300u				5700u	
27. N-nitrosodi-n-propylamine	1800u				7900u	
28. bis(2-ethyl hexyl) phthalate	1320u				5800u	
29. butyl benzyl phthalate	2200u				9700u	
30. di-n-butyl phthalate	260u				1100u	
31. di-n-octyl phthalate	2200u				9700u	
32. diethyl phthalate	440u				1900u	
33. dimethyl phthalate	440u				1900u	
34. benzo(a)anthracene	4400u				190,000u	
35. benzo(a)pyrene	13000u				570000u	
36. 3,4-benzofluroanthene	3500u				15000u	
37. benzo(k)fluoranthene	3500u				15000u	
38. chrysene	4400u				19000u	

BASE/NEUTRAL COMPOUNDS

PROJECT: EPA Idaho COMPILED BY: JM Blazevich DATE: 8-25-82

LABORATORY: EPA Region X REVIEWED BY: [illegible] DATE: 5 . 7-82

SAMPLE # :	composite of 29000, 29001 and 29002					29004		
UNITS :	ug/l					ug/Kg		
LOQ :								
1. acenaphthene	880u					3900u		
2. benzidine	66000u					290000u		
3. 1,2,4-trichlorobenzene	1320u					5900u		
4. hexachlorobenzene	2200u					9700u		
5. hexachloroethane	1760u					7700u		
6. bis(2-chloroethyl) ether	880u					3900u		
7. 2-chloronapthalene	880u					3900u		
8. 1,2-dichlorobenzene	440u					1900u		
9. 1,3-dichlorobenzene	440u					1900u		
10. 1,4-dichlorobenzene	440u					1900u		
11. 3,3'-dichlorobenzidine	22000u					97000u		
12. 2,4-dinitrotoluene	6600u					29000u		
13. 2,6-dinitrotoluene	6600u					29000u		
14. 1,2-diphenylhydrazine (as azobenzene)	440u					1900u		
15. fluroanthene	880u					3900u		
16. 4-chlorophenyl phenyl ether	8800u					3900u		

EPA REGION 10 LABORATORY

L305
LEAD

PRIORITY POLLUTANTS DATA REPORT

MEDIA: WATER

LAB NO: 29004 gmB

STATION NAME: CR225488

ANALYSIS BY: _____

STORET NO: _____

STATION LOCATION: Moscow, ID

DATE: _____

DATE/TIME: 7/22/82 1pm

FLOW: _____

% SOLIDS: _____

METALS (UG/L)

01097 _____ ANTIMONY
01002 _____ ARSENIC
01012 _____ BERYLLIUM
01027 _____ CADMIUM
01034 _____ CHROMIUM
01042 _____ COPPER
01051 _____ LEAD
71900 _____ MERCURY
01067 _____ NICKEL
01147 _____ SELENIUM
01077 _____ SILVER
01059 _____ THALLIUM
01092 _____ ZINC

MISCELLANEOUS (UG/L)

00720 _____ CYANIDE (MG/L)
32730 _____ PHENOLICS (AMP)
34225 _____ ASBESTOS

PESTICIDES (UG/L)

8-30-82 by DC/EC

39330 0.034 ALDRIN
39350 _____ CHLORDANE
39390 _____ DIELDRIN
39300 _____ 4,4 DDT
39320 _____ 4,4 DDE
39310 _____ 4,4 DDD
34361 _____ ALPHA ENDOSULFAN
34356 _____ BETA ENDOSULFAN
34351 _____ ENDOSULFAN SULFATE
39390 _____ ENDRIN
34366 _____ ENDRIN ALDEHYDE
39410 _____ HEPTACHLOR
39420 _____ HEPTACHLOR EPOXIDE
39337 _____ ALPHA BHC
39338 _____ BETA BHC
39340 _____ GAMMA BHC (LINDANE)
34259 _____ DELTA BHC
39400 0.16 TOXAPHENE
34671 0.0024 PCB 1016
39488 _____ PCB 1221
39492 _____ PCB 1232
39496 _____ PCB 1242
39500 _____ PCB 1248
39504 _____ PCB 1254
39508 _____ PCB 1260

BASE/NEUTRAL EXTRACTIBLES (UG/L)

34205 _____ ACENAPHTHENE
39120 _____ BENZIDINE
34551 _____ 1,2,4-TRICHLOROBENZENE
39700 _____ HEXACHLOROBENZENE
34396 _____ HEXACHLOROETHANE
34273 _____ BIS(2-CHLOROETHYL) ETHER
34581 _____ 2-CHLORONAPHTHALENE
34536 _____ 1,2-DICHLOROBENZENE
34566 _____ 1,3-DICHLOROBENZENE
34571 _____ 1,4-DICHLOROBENZENE
34631 _____ 3,3-DICHLOROBENZIDINE
34611 _____ 2,4-DINITROTOLUENE
34626 _____ 2,6-DINITROTOLUENE
34346 _____ 1,2-DIPHENYLHYDRAZINE
34376 _____ FLUORANTHENE
34641 _____ 4-CHLOROPHENYL PHENYL ETHER
34636 _____ 4-BROMOPHENYL PHENYL ETHER
34283 _____ BIS(2-CHLOROISOPROPYL)ETHER
34278 _____ BIS(2-CHLOROETHOXY) METHANE
39702 _____ HEXACHLOROBUTADIENE
34386 _____ HEXACHLOROCYCLOPENTADIENE
34408 _____ ISOPHORONE
34696 _____ NAPHTHALENE
34447 _____ NITROBENZENE
34439 _____ N-NITROSODIMETHYLAMINE
34428 _____ N-NITROSODI-N-PROPYLAMINE
34433 _____ N-NITROSODIPHENYLAMINE
39100 _____ BIS(2-ETHYLHEXYL) PHTHALATE
34292 _____ N-BUTYL BENZYL PHTHALATE
39110 _____ DI-N-BUTYL PHTHALATE
34596 _____ DI-N-OCTYL PHTHALATE
34336 _____ DIETHYL PHTHALATE
34341 _____ DIMETHYL PHTHALATE
34526 _____ BENZO(A)ANTHRACENE
34247 _____ BENZO(A)PYRENE
34230 _____ BENZO(B)FLUORANTHENE
34242 _____ BENZO(K)FLUORANTHENE
34320 _____ CHRYSENE
34200 _____ ACENAPHTHYLENE
34220 _____ ANTHRACENE
34521 _____ BENZO (GHI) PERYLENE
34381 _____ FLUORENE
34461 _____ PHENANTHRENE
34556 _____ 1,2,5,6-DIBENZANTHRACENE
34403 _____ INDENO(1,2,3-CD)PYRENE
34469 _____ PYRENE
34675 _____ TCDD

ACID EXTRACTIBLES (UG/L)

34621 _____ 2,4,6-TRICHLOROPHENOL
34452 _____ P-CHLORO-M-CRESOL
34586 _____ 2-CHLOROPHENOL
34601 _____ 2,4-DICHLOROPHENOL
34606 _____ 2,4-DIMETHYLPHENOL
34591 _____ 2-NITROPHENOL
34646 _____ 4-NITROPHENOL
34616 _____ 2,4-DINITROPHENOL
34657 _____ 4,6-DINITRO-O-CRESOL
39032 _____ PENTACHLOROPHENOL
34694 _____ PHENOL

VOLATILE ORGANICS (UG/L)

34210 _____ ACROLEIN
34215 _____ ACRYLONITRILE
34030 _____ BENZENE
32102 _____ CARBON TETRACHLORIDE
34301 _____ CHLOROBENZENE
32103 _____ 1,2-DICHLOROETHANE
34506 _____ 1,1,1-TRICHLOROETHANE
34496 _____ 1,1-DICHLOROETHANE
34511 _____ 1,1,2-TRICHLOROETHANE
34516 _____ 1,1,2,2-TETRACHLOROETHANE
34311 _____ CHLOROETHANE
32106 _____ CHLOROFORM
34501 _____ 1,1-DICHLOROETHYLENE
34546 _____ 1,2-TRANS-DICHLOROETHYLENE
34541 _____ 1,2-DICHLOROPROPANE
34704 _____ CIS-1,3-DICHLOROPROPENE
34699 _____ TRANS-1,3-DICHLOROPROPENE
34371 _____ ETHYLBENZENE
34423 _____ METHYLENE CHLORIDE
34418 _____ METHYL CHLORIDE
34413 _____ METHYL BROMIDE
32104 _____ BROMOFORM
32101 _____ BROMODICHLOROMETHANE
34488 _____ TRICHLOROFLUOROMETHANE
34668 _____ DICHLORODIFLUOROMETHANE
32105 _____ DIBROMOCHLOROMETHANE
34475 _____ TETRACHLOROETHYLENE
34010 _____ TOLUENE
39180 _____ TRICHLOROETHYLENE
39175 _____ VINYL CHLORIDE
34268 _____ BIS(CHLOROMETHYL) ETHER
34576 _____ 2-CHLOROETHYL VINYL ETHER

EPA REGION 10 LABORATORY

PRIORITY POLLUTANTS DATA REPORT

MEDIA: SEDIMENT

LAB NO 29000, 29001 + 29002

STATION NAME: _____

ANALYSIS BY: _____

STORET NO: Composite

STATION LOCATION: _____

DATE: _____

DATE/TIME: _____

FLOW: _____

% SOLIDS: _____

METALS (MG/KG) (DRY)

01000 _____ ANTIMONY
01003 _____ ARSENIC
01013 _____ BERYLLIUM
01028 _____ CADMIUM (WET)
01029 _____ CHROMIUM
01043 _____ COPPER (WET)
01052 _____ LEAD
71921 _____ MERCURY
01068 _____ NICKEL
01148 _____ SELENIUM
01078 _____ SILVER
34480 _____ THALLIUM
01093 _____ ZINC (WET)

MISCELLANEOUS (MG/KG)

00721 _____ CYANIDE (DRY)
32731 _____ PHENOLICS (AAP)
34220 _____ ASBESTOS (UG/KG)

PESTICIDES (UG/KG)

39333 0.364 ALDRIN (DRY)
39351 _____ CHLORDANE (DRY)
39383 _____ DIELDRIN (DRY)
39301 _____ 4,4'DDT (DRY)
39321 _____ 4,4'DDE (DRY)
39311 _____ 4,4'DDD (DRY)
34364 _____ ALPHA ENDOSULFAN
34359 _____ BETA ENDOSULFAN
34354 _____ ENDOSULFAN SULFATE
39393 _____ ENDRIN (DRY)
34369 _____ ENDRIN ALDEHYDE
39412 _____ HEPTACHLOR (DRY)
39423 _____ HEPTACHLOR EPOXIDE (DRY)
39076 _____ ALPHA BHC (DRY)
34257 _____ BETA BHC
39343 _____ GAMMA BHC (LINDANE)
34262 _____ DELTA BHC
39403 22.4 TOXAPHENE (DRY)
39514 7.34 PCB 1016 (DRY)
39491 _____ PCB 1221 (DRY)
39495 _____ PCB 1232 (DRY)
39499 _____ PCB 1242 (DRY)
39503 _____ PCB 1248 (DRY)
39507 _____ PCB 1254 (DRY)
39511 _____ PCB 1260 (DRY)

8-30-87 mg/kg DMR

BASE NEUTRAL EXTRACTIBLES (~~UG/KG~~) mg/Kg

34208 _____ ACENAPHTHENE
39121 _____ BENZIDINE (DRY)
34554 _____ 1,2,4-TRICHLOROBENZENE
39701 _____ HEXACHLOROBENZENE (DRY)
34399 _____ HEXACHLOROETHANE
34276 _____ BIS(2-CHLOROETHYL) ETHER
34584 _____ 2-CHLORONAPHTHALENE
34539 _____ 1,2-DICHLOROBENZENE
34569 _____ 1,3-DICHLOROBENZENE
34574 _____ 1,4-DICHLOROBENZENE
34634 _____ 3,3-DICHLOROBENZIDINE
34614 _____ 2,4-DINITROTOLUENE
34629 _____ 2,6-DINITROTOLUENE
34349 _____ 1,2-DIPHENYLHYDRAZINE
34379 _____ FLUORANTHENE
34644 _____ 4-CHLOROPHENYL PHENYL ETHER
34639 _____ 4-BROMOPHENYL PHENYL ETHER
34286 _____ BIS(2-CHLOROISOPROPYL)ETHER
34281 _____ BIS(2-CHLOROETHOXY) METHANE
39705 _____ HEXACHLOROBUTADIENE
34389 _____ HEXACHLOROCYCLOPENTADIENE
34411 _____ ISOPHORONE
34445 _____ NAPHTHALENE
34450 _____ NITROBENZENE
34441 _____ N-NITROSODIMETHYLAMINE
34431 _____ N-NITROSODI-N-PROPYLAMINE
34436 _____ N-NITROSODIPHENYLAMINE
39102 _____ BIS(2-ETHYLHEXYL) PHTHALATE (DRY
34295 _____ N-BUTYL BENZYL PHTHALATE
39112 _____ DI-N-BUTYL PHTHALATE (DRY
34599 _____ DI-N-OCTYL PHTHALATE
34339 _____ DIETHYL PHTHALATE
34344 _____ DIMETHYL PHTHALATE
34529 _____ BENZO(A)ANTHRACENE
34250 _____ BENZO(A)PYRENE
34233 _____ BENZO(B)FLUORANTHENE
34245 _____ BENZO(K)FLUORANTHENE
34323 _____ CHRYSENE
34203 _____ ACENAPHTHYLENE
34223 _____ ANTHRACENE
34524 _____ BENZO (GHI) PERYLENE
34384 _____ FLUORENE
34464 _____ PHENANTHRENE
34559 _____ 1,2,5,6-DIBENZANTHRACENE
34406 _____ INDENO(1,2,3-C,D)PYRENE
34472 _____ PYRENE
34678 _____ TCDD

ACID EXTRACTIBLES (~~UG/KG~~) mg/Kg

34624 _____ 2,4,6-TRICHLOROPHENOL
34455 _____ P-CHLORO-M-CRESOL
34589 _____ 2-CHLOROPHENOL
34604 _____ 2,4-DICHLOROPHENOL
34609 _____ 2,4-DIMETHYLPHENOL
34594 _____ 2-NITROPHENOL
34649 _____ 4-NITROPHENOL
34619 _____ 2,4-DINITROPHENOL
34660 _____ 4,6-DINITRO-O-CRESOL
39061 _____ PENTACHLOROPHENOL (DRY)
34695 _____ PHENOL (C6H5OH)

8-26-82 DMR

VOLATILE ORGANICS (~~UG/KG~~)

34213 _____ ACROLEIN
34219 _____ ACRYLONITRILE
34237 _____ BENZENE
34299 _____ CARBON TETRACHLORIDE
34304 _____ CHLOROBENZENE
34534 _____ 1,2-DICHLOROETHANE
34509 _____ 1,1,1-TRICHLOROETHANE
34499 _____ 1,1-DICHLOROETHANE
34514 _____ 1,1,2-TRICHLOROETHANE
34519 _____ 1,1,2,2-TETRACHLOROETHANE
34314 _____ CHLOROETHANE
34319 _____ CHLOROFORM
34504 _____ 1,1-DICHLOROETHYLENE
34549 _____ 1,2-TRANS-DICHLOROETHYLENE
34544 _____ 1,2-DICHLOROPROPANE
34702 _____ CIS-1,3-DICHLOROPROPENE
34697 _____ TRANS-1,3-DICHLOROPROPENE
34374 _____ ETHYLBENZENE
34426 _____ METHYLENE CHLORIDE
34421 _____ METHYL CHLORIDE
34416 _____ METHYL BROMIDE
34290 _____ BROMOFORM
34330 _____ BROMODICHLOROMETHANE
34491 _____ TRICHLOROFLUOROMETHANE
34334 _____ DICHLORODIFLUOROMETHANE
34309 _____ DIBROMOCHLOROMETHANE
34478 _____ TETRACHLOROETHYLENE
34483 _____ TOLUENE
34487 _____ TRICHLOROETHYLENE
34425 _____ VINYL CHLORIDE
34271 _____ BIS(CHLOROMETHYL) ETHER
34579 _____ 2-CHLOROETHYL VINYL ETHER

ENVIRONMENTAL PROTECTION AGENCY
Office of Enforcement

FIGURE 5
CHAIN OF CUSTODY RECORD

(Appropriate Address)

EPA EXHIBIT 23 - IDAHO

Proj. No.:

Project Name: Arcom / Dreyfler Pathdrum, Idaho

SAMPLERS (Signature): Athena K. Lalikos, Mike Brown

STA. NO. Lab #	DATE 1982	TIME AM	COMP.	GRAB	STATION LOCATION	NO. OF CONTAINERS	REMARKS
29000	07-20	10/11:00		X	Near Holding tank	1/40 ml	CR 225479 Petroleum mixture - gr surface
29001	"	"		X	Near Holding tank	1/40 ml	CR 225480 Petroleum mixture - gr. surface
29002	"	"		X	Near Holding tank	1/40 ml	CR 225481 Petroleum mixture - gr surface
29003	"	"		X	Underneath Loading Rack	1 pint	CR 225482 Soil
29004	"	"		X	Inside / underground sump	1 pint	CR 225483 Oil

Relinquished by (Signature)	Date/Time	Received by (Signature)	Relinquished by: (Signature)	Date/Time	Received by: (Signature)
Athena K. Lalikos	07-29 82				
Relinquished by: (Signature)	Date/Time	Received by: (Signature)	Relinquished by: (Signature)	Date/Time	Received by: (Signature)
Relinquished by: (Signature)	Date/Time	Received for Laboratory by: (Signature) R. H. Rieck	Date/Time 8-5-82 1245	Remarks	

Distribution: Original Accompanies Shipment; Copy to Coordinator Field Files

FIELD SAMPLE DATA SHEET

YR.	MO.	DY.
82	07	20

LOCATION: Arrow / Dreyler
Rathdrum, Idaho

PROJECT SUPERVISOR

SEND DATA TO: Athena K Lalikos
Mike Brown

NOTES: ~~Pool samples 29000, 29001 & 29002 analyze [illegible] Priority Pollutant Scan~~
~~Contact M. Brown (442-2852)~~
~~Expedite - Ron Blair~~

[X] POSSIBLE HAZARDOUS OR TOXIC MATERIAL

CREW: [illegible] with Athena 8-6-82

RECORDER

ENFORCEMENT [ ]

L305LMID

EPA EXHIBIT 24-IDAHO

CARD	MEDIA: Waste oil	WATER	SEDIMENT	TISSUE	Gloves	PRESERVATION: UNPRES	H_2SO_4	HNO_3	ICED	FROZEN	LAB NUMBER	STORET STATION	DATE YR	MO	DY	TIME	COMPOSITE ONLY: ENDING DATE MO	DY	TIME	# GRAB	DEPTH	UNITS	TYPE	STATION NAME
1	X										29000		82	07	20	10/11:00								CR 225479 - gr surface oil
1	X										29001		82	07	20									CR 225480 gr surface oil
1	X										29002		82	07	20									CR 225481 gr surface oil
1			X								29003		82	07	20									CR 225482 - Loading lock
1	X										29004		82	07	20									CR 225483 - Sump
1																								
1																								
1																								
1																								
1					X						29010													Disposable Gloves

USE "C" FOR CONTINUOUS

CARD	LAB NUMBER	%FROM RIGHT BANK	TEMP. °C	D.O. BOTTLE	D.O. mg/l	pH	COND. umho/Cm	TOTAL ALK. mg/l	TURBIDITY FTU	FLOW	UNITS	GAGE HEIGHT FEET
2												
2												
2												
2												
2												
2												
2												
2												
2												
2												

LEGEND

DEPTH UNITS:
F-FEET
M-METER

DEPTH TYPE:
BLANK FOR REGULAR
I-INTEGRATED
B-BOTTOM

FLOW UNITS:
C-CFS
M-MGD
G-GPM

[illegible] LOOKING UPSTREAM

COPY