STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY

IL 532-0357
ADM 39

Subject Reilly Tar & Chem. Corp
Data Review Notes ; Re-submittal of addtl data
Reviewed by EPT 4 Meeting of 11-17-82 Date

EPA Region 5 Records Ctr.
393343

4. Response to review Letter of 10/28/82 ; DLPC aspects
1 Drum storage areas are locations (red) of single drums located in specific plant locations to recieve spillage, dirty gloves etc.
- drum contents are emptied into the contained waste pile ~~on a regular periodic basis~~. - as needed

2 Tank storage - tanks indicated in original application are ~~two~~ three large (Nos 99 & 100) wastewater treatment system tanks - these tanks will be considered in the DWPC application.

3 Waste Pile - 250 cy yd/yr of waste is generated and added to pile - NOTE: between 9/14/81 and 10/1/81 2,032 CY of waste were removed to disposal in MISSOURI.
- Waste is U051 plus lab reagents and contaminated gloves, rags etc.
- pile is in a CONCRETE PIT - walls & bottom 12" sides extend 2' above grade - Limit run on, run-off
pit dimentions are 10'3" d, 61'-l, 49'-w.
- Any collected water is pumped to existing lagoons
- Waste is damp & is NOT CONDUCIVE to dispersal by wind.

4. IMPOUNDMENTS -
a - Surface impoundment to be cleaned and closed upon completion of a new waste water treatment system
- closure plan submitted -
- contaminated soil & sludge to be disposed off site @ secure landfill.

b - The cleaned pond will then be used to contain treated discharge from WWTP pending discharge to sewer.

5. Geohydrological Investigation - background ground water sample data

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

MEMORANDUM

TO: Ray Ehrhardt Permits DWPC DATE: 10-27-82

FROM: Gene Theios Permits DLPC

☒ Information only

SUBJECT: Reilly Tar & Chem. Corp.

☐ Response requested

Land Division Comments re CROPA; Letter.

1. The application to DLPC is for storage of waste in tanks, drums & waste piles and surface impoundments; however, the locations of drum storage areas, waste tanks, and waste piles are not shown on plan sheets. Also, site plan sheet does not differentiate or identify material, product or waste storage areas.

2. Application is confusing regarding waste storage in tanks. The application is checked for tank storage (VII-A) while narrative (VII-B 7, a) for tanks indicates none.

3. Please provide data on each container (drum) waste storage area to include locations, number of containers, waste segregation, materials, age and condition of containers, secondary containment, spill prevention and clean-up procedures. A plan sheet showing a cross section drawing of the storage area is needed. Please refer to Sec. VII of the permit application instructions.

4. Please provide the locations of waste piles; include details of construction, characteristics and quantity of waste; protection against run-on, run-off and wind dispersion; and the duration of storage, disposal plan and closure plan.

5. The application refers to and contains a copy of portions of the RCRA, Part A application to USEPA; that application refers to several waste streams that are processed on-site by incineration. In previous discussions it was stated that the on-site incinerator was not completed and was never used. How are each of the waste types listed presently managed and disposed? It would be desirable to include the chart, as provided on page 7 of the application instructions to identify each waste, waste quantity, storage or treatment method and frequency of transport off-site for disposal.

6. The hydrogeologic investigation included monitor wells but did not include any groundwater sample data to establish background groundwater quality or to evaluate

EPA-90A (6/75-10M)

6. Cont.

the facility's impact on the quality of the groundwater in the uppermost aquifer underlying the site. Please submit background concentrations for those parameters for establishing groundwater quality and for those used as indicators of groundwater contamination as provided in 35 Adm. Code sec. 725.192.