TSD File Inventory Index

Date: August 28, 2001

Initial: CMHenwood

Facility Name:	Amerdee, Inc. (Two Folder Site)
Facility Identification Number:	ILD 161 401 476

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

Total - 2

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

Note: Transmittal Letter to Be Included with Reports.

Comments: Documents do not justify individual folder per schedule C.3
Enforcement Confidential are in separate folders

A.1 Public Participation

Media Contact: Anne Rowan
(312) 886-7857

Technical Contact: Barbara Russell
(312) 353-7922

FOR IMMEDIATE RELEASE

NO.

U.S. EPA FILES ADMINISTRATIVE COMPLAINT AGAINST Amerdec, Inc.

FOR HAZARDOUS WASTE VIOLATIONS

The United States Environmental Protection Agency (U.S. EPA) Region V today announced the filing of a civil administrative action against Amerdec, Inc., Waukegan, Illinois .

The Complaint against Amerdec, Inc., proposes a penalty of and charges that the facility located at 90 Le Baron, Waukegan, Illinois has violated Federal and State regulations regarding the management of hazardous waste contained in the Resource Conservation and Recovery Act (RCRA).

Amerdec, Inc., has failed to meet particular requirements of RCRA and 35 Ill. Adm. Code 720 et seq. relating to Transportation and Storage of hazardous waste.

Amerdec, Inc., has the right to request that U.S. EPA hold a settlement conference and a hearing to discuss the charges. The company must make such a request by _____, 19 .

###

A.2 Part A/
Interim Status

Ameredec is no longer generating nor storing haz. wastes per RCRA LDF Inspection Report of 11/8/89 –

Coded as NN6 in RCRIS ~~Handb~~ in S Source.

S. Kidden 10/8/92

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

Form Approved. OMB No. 2050-0028. Expires 9-30-88.
GSA No. 0246-EPA-OT

United States Environmental Protection Agency
Washington, DC 20460

88.6468

EPA Notification of Hazardous Waste Activity

Please refer to the *Instructions for Filing Notification* before completing this form. The information requested here is required by law *(Section 3010 of the Resource Conservation and Recovery Act).*

For Official Use Only

Comments: N

Installation's EPA ID Number	T/A	C	Approved	Date Received (yr. mo. day)
ILD 1614014 76		1	A	880607

I. Name of Installation

AMERDEC INC

II. Installation Mailing Address

Street or P.O. Box: 90 LeBaron

City or Town	State	ZIP Code
Waukegan	IL	60085

III. Location of Installation

Street or Route Number: 90 LeBaron

City or Town	State	ZIP Code
Waukegan	IL	60085

IV. Installation Contact

Name and Title *(last, first, and job title)*	Phone Number *(area code and number)*
Thomas Allegretti	312 623 6650

V. Ownership

A. Name of Installation's Legal Owner	B. Type of Ownership *(enter code)*
Corporation	

VI. Type of Regulated Waste Activity *(Mark 'X' in the appropriate boxes. Refer to instructions.)*

A. Hazardous Waste Activity

- ☐ 1a. Generator
- ☐ 1b. Less than 1,000 kg/mo.
- ☐ 2. Transporter
- ☒ 3. Treater/Storer/Disposer ONE TIME PURPOSE
- ☐ 4. Underground Injection
- ☐ 5. Market or Burn Hazardous Waste Fuel *(enter 'X' and mark appropriate boxes below)*
  - ☐ a. Generator Marketing to Burner
  - ☐ b. Other Marketer
  - ☐ c. Burner

B. Used Oil Fuel Activities

- ☐ 6. Off-Specification Used Oil Fuel *(enter 'X' and mark appropriate boxes below)*
  - ☐ a. Generator Marketing to Burner
  - ☐ b. Other Marketer
  - ☐ c. Burner
- ☐ 7. Specification Used Oil Fuel Marketer *(or On site Burner)* Who First Claims the Oil Meets the Specification

RECEIVED JUN 07 1988

VII. Waste Fuel Burning: Type of Combustion Device *(enter 'X' in all appropriate boxes to indicate type of combustion device(s) in which hazardous waste fuel or off-specification used oil fuel is burned. See instructions for definitions of combustion devices.)*

☐ A. Utility Boiler ☐ B. Industrial Boiler ☐ C. Industrial Furnace

VIII. Mode of Transportation *(transporters only — enter 'X' in the appropriate box(es)*

☐ A. Air ☐ B. Rail ☐ C. Highway ☐ D. Water ☐ E. Other *(specify)*

IX. First or Subsequent Notification

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

☒ A. First Notification ☐ B. Subsequent Notification *(complete item C)*

C. Installation's EPA ID Number

ID — For Official Use Only														
C													T/A	C
W														1

X. Description of Hazardous Wastes *(continued from front)*

A. Hazardous Wastes from Nonspecific Sources. Enter the four-digit number from 40 *CFR* Part 261.31 for each listed hazardous waste from nonspecific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
F006					
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 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 hazardous waste from hospitals, veterinary hospitals, or medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54

E. Characteristics of Nonlisted Hazardous Wastes. Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles. *(See 40 CFR Parts 261.21 — 261.24)*

- ☐ 1. Ignitable *(D001)*
- ☐ 2. Corrosive *(D002)*
- ☐ 3. Reactive *(D003)*
- ☒ 4. Toxic *(D000)*

XI. Certification

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

Signature	Name and Official Title *(type or print)*	Date Signed
Thomas Allegretti		5/31/88

C.2 Compliance/ Enforcement

JUL 1 9 1990

5HR-12

Mr. Todd Marvel
Division of Land Pollution Control
Illinois Environmental Protection Agency
2200 Churchill Road
Springfield, Illinois 62706

Re: Amerdec, Inc.
ILD 161 401 476
CAFO Docket No.: V-W-88-R-018

Dear Mr. Marvel:

Please find enclosed copies of Incomes Tax Returns, Financial spreadsheets, and other financial documents submitted to the United States Environmental Protection Agency by the above-referenced facility for review.

This information was requested during the July 11, 1990, Illinois Enforcement conference call. If you have any questions, please feel free to contact Barbara Russell of my staff (312) 353-7922.

Sincerely yours,

Paul E. Dimock, Chief
IL/MI/WI Enforcement Program Section

Enclosures

cc: Glen Savage
William Radlinski

5HR-12:B. RUSSELL:o.r.:3-7925:07/12/90:FILENAME:MARVEL:DISK #1

O.R. 7/12/90

19 DEC 1989

5HR-12

Mrs. Magdalene Allegretti
President
Amerdec, Inc.
90 LeBaron
Waukegan, Illinois 60085

Re: Land Disposal Restrictions
Amerdec, Inc.
ILD 161 401 476

Dear Mrs. Allegretti:

On November 8, 1989, the Illinois Environmental Protection Agency (IEPA), representing the United States Environmental Protection Agency (U.S. EPA), conducted a Resource Conservation and Recovery Act (RCRA) inspection of the above-referenced facility. The purpose of the inspection was to determine the facility's compliance with the applicable hazardous waste management requirements of RCRA, including the land disposal restrictions. The land disposal restrictions for F001-F005 spent solvents and dioxin-containing wastes became effective on November 7, 1986, for California List hazardous wastes on July 8, 1987, for the First Third of hazardous wastes on August 8, 1988, and for the Second Third of hazardous wastes on June 8, 1989, (40 CFR Part 268 and revisions to 40 CFR Parts 260-265 and 270-271).

With respect to the land disposal restrictions section of the inspection, your facility was found to be in compliance with the requirements. A copy of the inspection report is enclosed for your records.

If you have any questions regarding this correspondence, please contact Barbara Russell of my staff at (312) 353-7922.

Sincerely yours,

OR 12/18/89

RCRA ENFORCEMENT	RED STAFF	RED SECTION CHIEF	RED CHIEF
INIT DATE	BR 12/19/89	P.E.D. 12-19-89	

Paul E. Dimock, Chief
IL/MI/WI Enforcement Program Section

Enclosure

cc: Harry Chappel, IEPA
Glenn Savage, IEPA

5HR-12:B. RUSSELL:or:3-7925:12/12/89:DISK#3:FILENAME:Alleg:final or/12/18/89

Beth Henning
AHG

AMERDEC, INC

RECEIVED
NOV 14 1989
OFFICE OF RCRA
WASTE MANAGEMENT DIVISION
EPA, REGION V

90 Le Baron
Waukegan, Il 60085
312 623 6650

Amerdec, Inc., by its agent, Magdalene Allegretti, President, states as follows:

Amerdec, Inc has had all hazaradous materials (mostly ion exchange resin) removed from its premises. All materials have been rendered "non hazaradous".

**** Certification and Manifest from Envirite Corp., **** copies are attached.

Soil samples from the area on which the drums sat were submitted to Gabriel Midwest Laboratories, Kenosha. The samples were found to be well within the compliance range of the Regulations.

**** Lab reports attached****

Amerdec, Inc has never delivered nor received "service recycling" units from either the Electroplaters or PC Board Manufacturers.

Amerdec., Inc does not have either the personnel or vehicles to accommodate the Electroplaters or PC Board Manufacturers, on a service basis.

The premises of Amerdec, Inc are not equipped to handle "service recycling" units from the above referenced fields. There is "no plate-out" system to handle the heavy metals and there are no large regenerating units on the premises as would be required.

To conclude - Amerdec, Inc does not function as a "service recycling" facility for the above fields and it never has.

Magdalene Allegretti

Magdalene Allegretti
President

Amerdec, Inc
ILD 161 401 476
CAFO Docket V-W-88-R-018

LABORATORY REPORT

3307 - 14th Avenue
Kenosha, Wisconsin 53140
Phone (414) 652-5656
Fax (414) 652-5902
1-800-284-3823

gabriel - midwest, ltd.
Environmental & Technical Services

TO: Mr. Jim Bland, Intergrated Lakes Management, Waukegan, IL
SUBJECT: Analysis Of Soil Samples, Amerdec Inc.
WI CERTIFICATION ID #: 252087440
P.O.#: Verbal/Bland
SAMPLE DATE: NOT GIVEN
REPORT NUMBER: 5744A
REPORT DATE: 10/10/89

DATE RECEIVED: 09/19/89
REVEISED: 10/11/89

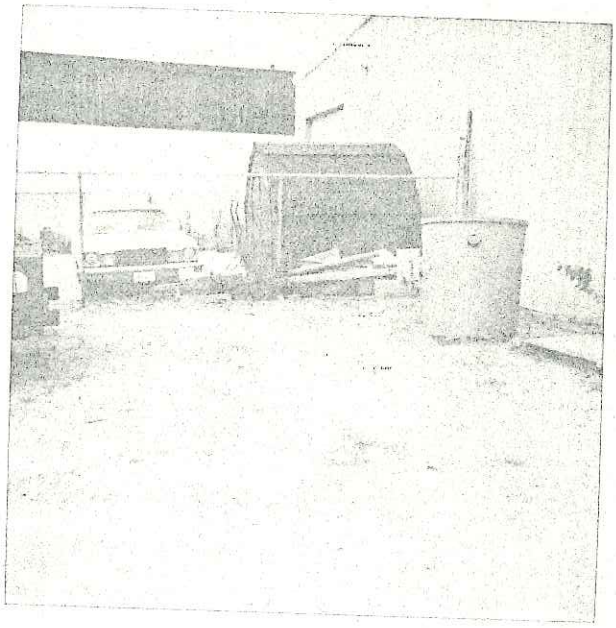
ANALYSIS

GML SAMPLE CODE	4149I-89	4150I-89	4151I-89
SAMPLE DESCRIPTION	1A	1B	2A
EP TOX. Chromium	0.065 ppm	0.049 ppm	0.016 ppm

GML SAMPLE CODE	4152I-89
SAMPLE DESCRIPTION	2B
EP TOX. Chromium	0.040 ppm

White Copy - Client
Yellow Copy - Control
Pink Copy - Billing

LAB DIRECTOR Dr. Johnson Rikuth, Ph.D.



this picture was taken after the materials were removed.

ENVIRITE CORPORATION
TECHNOLOGY FOR THE ENVIRONMENT

June 23, 1989

Mrs. Maggie Allegretti
Amerdec
90 LeBaron
Waukegan, IL 60085

Dear Maggie,

Enclosed are copies of the analytical work completed on your chromic acid, and a 1:1 composite of resin and floor sweeping solids.

Envirite picked up 6 one-cubic-yard bags, and 4 drums of chromic acid on June 9.

Thank you for the opportunity to be of service.

Sincerely,

Douglas Newman
Sales Manager

DAN:dew
Enclosures

16435 SOUTH CENTER AVENUE HARVEY, ILLINOIS 60426-6078 PHONE: (312) 596-7040

NONHAZARDOUS CERTIFICATION

This is to certify that corrosive material *waste received* 06/13/89 *from* Amerdec, Inc. *on manifest #* 4042349 *has been rendered nonhazardous in full compliance with the terms of Envirite Corporation's delisting petition granted by the U.S. EPA November 6, 1986.*

Having changed this hazardous waste into a nonhazardous material, Envirite Corporation has eliminated all Amerdec, Inc. *future hazardous waste liability for this material under RCRA (Resource Conservation and Recovery Act of 1976).*

Geoffrey Stengel, Jr.
President

Operations Manager

ENVIRITE

Corporate Headquarters
Plymouth Meeting, Pennsylvania 19462

© GOES 346

STATE OF ILLINOIS ENVIRONMENTAL PROTECTION AGENCY DIVISION OF LAND POLLUTION CONTROL

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

State Form LPC 62 8/81 IL532-0610

FOR SHIPMENT OF HAZARDOUS, INFECTIOUS AND SPECIAL WASTE.

PLEASE TYPE (Form designed for use on elite (12-pitch) typewriter.) **EPA Form 8700-22 (Rev. 9-86)** Form Approved. OMB No. 2050-0039, Expires 9-30-91

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: ILD 161401476 — Manifest Document No.:

2. Page 1 of 2 — Information in the shaded areas is not required by Federal law, but is required by Illinois law.

3. Generator's Name and Mailing Address: Amerdec, Inc, 90 Le Baron, Waukegan, Il 60085 — Location If Different:

4. Generator's Phone (312) 623 6650

A. Illinois Manifest Document Number: IL 4042349 — MANIFEST FEE PAID

B. Illinois Generator's ID: 0 9 7 1 9 0 0 0 3 4

5. Transporter 1 Company Name: Envirite Corp — 6. US EPA ID Number: ILD 000666206

C. Illinois Transporter's ID: 1 0 7 1

D. (312) 596 7040 Transporter's Phone

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

E. Illinois Transporter's ID

F. ( ) Transporter's Phone

9. Designated Facility Name and Site Address: Envirite Corp, 16435 Center Ave, Harvey, Il 60426 — 10. US EPA ID Number: ILD 000 666 206

G. Illinois Facility's ID: 0 3 1 1 1 1 0 0 0 1

H. Facility's Phone: (312) 596 7040

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. (RQ) Chromic acid waster corrosive material UN 1755 (D002) (RQ 1000)	004	DF	00220	1	EPA HW Number: XX D002; Authorization Number: 000054
b. (RQ) Hazaradous waste Solid N.O.S. ORM - E NA 9189 (F006) (RQ 1)	006	BA	00006	2	EPA HW Number: XX F006; Authorization Number: 000010
c.					EPA HW Number: XX; Authorization Number:
d.					EPA HW Number: XX; Authorization Number:

J. Additional Descriptions for Materials Listed Above

K. Handling Codes for Wastes Listed Above In Item # 14: 1 = Gallons 2 = Cubic Yards

15. Special Handling Instructions and Additional Information

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

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

Printed/Typed Name: Amerdec, Inc Magdalene Allegretti — Signature: Magdalene Allegretti — Date (Month Day Year): 06 09 89

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name: Henry Campbell — Signature: [signature] — Date (Month Day Year): 06 09 89

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name — Signature — Date (Month Day Year)

19. Discrepancy Indication Space

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

Printed/Typed Name — Signature — Date (Month Day Year)

GENERATOR — TRANSPORTER — FACILITY

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

This Agency is authorized to require, pursuant to Illinois Revised Statutes, Chapter 111½ Section 21, that this information be submitted to the Agency. Failure to provide the information may result in a civil penalty against the owner or operator of not to exceed $25,000 per day of violation. Falsification of this information may result in a fine up to $50,000 per day of violation and imprisonment up to 5 years. This form has been approved by the Forms Management Center.

COPY 6. GENERATOR COPY

ENVIRITE
TECHNOLOGY FOR THE ENVIRONMENT

ENVIRITE CORPORATION

16435 CENTER AVE.
HARVEY, IL 60426-6078
(312) 596-7040

INVOICE NUMBER
E 13237

ALL INQUIRIES AND CORRESPONDENCE MUST REFER TO THE ABOVE NUMBER

SOLD TO:
Amerdec
90 LeBaron
Waukegan, IL 60085
Attn: Accounts Payable

PICK-UP LOCATION:
Same

PICK-UP DATE	YOUR ORDER NO.	INVOICE DATE	TERMS	SHIPPED VIA
6/09/89		6/12/89	NET 30 DAYS	B/L H# 16838

☒ OUR TRUCK
☐ OTHER

QUANTITY	DESCRIPTION	TREATMENT PRICE	AMOUNT
4 Drums 220 Gals.	Treatment of Waste Chromic Acid H 2624	$155/Drum	$ 620.00
	IL Hazardous Waste Tax ($.02/gal.)		4.40
	Demurrage Charge @ $15/qtr. hr. for 2 hours and 15 minutes		135.00
	Transportation Charge		450.00
	Manifest #4042349		
		TRANSPORTATION CHARGE	
		SALES TAX	
		TOTAL	$1209.40

ORIGINAL

ENVIRITE CORPORATION
16435 CENTER AVENUE
HARVEY, IL 60426

BILL OF LADING H- ~~632~~ 16838

ORIGIN Waukegan, IL

PICKUP DATE 6/9/89

DESTINATION HARVEY, IL

PICKUP TIME

CONSIGNOR Amerdec II #2624

CONSIGNEE ENVIRITE

HM	US DOT DESCRIPTION:	QUANTITY
X	RQ (1000) Waste Chromic Acid Solution Corrosive Material UN1755 (D002)	EST. 220 ~~gal~~

PLACARD: Corrosive

UN/NA#: UN1755

WASTE STREAM Chromic Acid

ASK LOADER TO VERIFY PRODUCT SHOWN ABOVE

LBS./GAL. MAX. LOAD INCHES

TRACTOR 8 TRAILER /TYPE VAN DRIVER HENRY

☐ VAC. PUMP FT. HOSE OTHER EQUIPMENT:

DRIVERS MUST USE SPECIFIED SAFETY EQUIPMENT & PROCEDURES

ACID SUIT FACE SHIELD HARD HAT RUBBER GLOVES SAFETY WATER GAS MASK

OTHER

IF PRODUCT TEMPERATURE IS OVER 110 °F, CALL ENVIRITE

		A.M.	P.M.
ARRIVAL AT CUSTOMER	1:30	X	
DEPARTED CUSTOMER	2:50		X

THIS IS TO CERTIFY THAT THE ABOVE NAMED ARTICLES ARE PROPERLY CLASSIFED, DESCRIBED, PACKAGED, MARKED AND LABELED, AND ARE IN PROPER CONDITION FOR TRANSPORTATION, ACCORDING TO THE APPLICABLE REGULATIONS OF THE DEPARTMENT OF TRANSPORTATION.

☐ DRUM VACUUMING *

TOTAL TIME 3 Hrs. 20 Min.

REASON FOR DELAY:

TOTAL CUSTOMER TIME IN EXCESS OF ONE HOUR WILL BE BILLED AT THE CONTRACT RATE
*DRUM VACUUMING WILL BE BILLED PER CONTRACT

GENERATOR SIGNATURE: M. Allagrette

SIGNATURE ACKNOWLEDGES STATEMENT AS CORRECT

WHITE-CORPORATE/CANARY-OFFICE/PINK-TRANSPORTER/GOLDENROD-CUSTOMER

ENVIRITE
CHNOLOGY FOR THE ENVIRONMENT

ENVIRITE CORPORATION

16435 CENTER AVE.
HARVEY, IL 60426-6078
(312) 596-7040

INVOICE NUMBER
E 13177

ALL INQUIRIES AND CORRESPONDENCE MUST REFER TO THE ABOVE NUMBER

SOLD TO:
Amerdec
90 LeBaron
Waukegan, IL 60085

Attention: Accounts Payable

PICK-UP LOCATION:

PICK-UP DATE	YOUR ORDER NO.	INVOICE DATE	TERMS	SHIPPED VIA
		06/07/89	NET 30 DAYS	☐ OUR TRUCK ☐ OTHER

QUANTITY	DESCRIPTION	TREATMENT PRICE	AMOUNT
	Analytical Fee - Sample Description: Chromic Acid, H# 2624.		$250.00
	(Confirmed By: Maggie Allegretti)		
		TRANSPORTATION CHARGE	
		SALES TAX	
		TOTAL	$250.00

ORIGINAL

ENVIRITE
TECHNOLOGY FOR THE ENVIRONMENT

SERVICE PROPOSAL FOR DRUM DISPOSAL

Co. Name: Amerdec

Contact: Maggie Allegretti; 623-6650

Address: 90 LeBaron

Date: June 6, 1989

City, St., Zip: Waukegan, IL 60085

Manifest Authorization #: 000054

We propose to accept your waste, Chromic Acid, H# 2624 in drums* provided terms and conditions are met as specified below.

Laboratory Fees: $ 250.00

Treatment Price: $ 155.00 per drum, plus $.02 per gal./Haz. Waste Treatment Tax

Transportation Price: $ 450.00

**Any leaking or unsafe drum that arrives at Envirite will be immediately overpacked and returned to the customer at a $ 200.00 charge per drum.*

Terms and Conditions: The quoted treatment price is based upon the makeup of your waste as represented in your sample that we have analyzed. Below are the factors that determine our treatment price. Any material not conforming with the following treatment specifications may be billed at a higher price or the drum may be returned to the customer. Any drum containing debris or material not previously analyzed will be returned to the customer.

Max of 1.5 lbs./gal. of reagent for neutralization.	Max of --- mg/l TOC
Max of 0.04 lbs./gal. of reagent to remove metals.	Max of 0.05 Bisulfite
Max of 5.2 lbs./gal. of process sludge.	Max of ---

Absence of Arsenic, Beryllium, Carcinogens, Dioxin, Mercury, Oil, P.C.B., Radioactives, Selenium and/or Solvents is guaranteed by customer.

We agree to certify in writing that your waste is nonhazardous after your waste material has been treated by the ENVIRITE PROCESS.

ENVIRITE CORPORATION ILD000666206 Site #0311110001

By: _____
Technical Service Representative

Sales Manager
Douglas A. Newman

16435 South Center Avenue · Harvey, Illinois 60426-6087 · (312) 596-7040

CUSTOMER EVALUATION SHEET

AMERDEC
Customer Name and Address

90 CE BARON
Street

WAUKEGAN, IL. 60085
City, State, Zip

H # 2624

Date 6/2/89

Volume 220 GALS

Frequency 1 X

Tanker Type DRUMS

Chemical Description Chromic Acid

Physical Description DARK GREEN LIQUID

Special Handling Instructions

INORGANIC — ANALYTICAL DATA

As Received		Filtrate	Leachate
1.08	Spec. Gravity		
<1	ph		
2.6	Normality		
14.2	% Cr		
<0.1	Arsenic		
<2.0	Barium		
7.0	Cadmium	0.02	0.02
16,000	Chromium	0.1	0.1
8000	Chromium (+6)	<0.1	<0.1
6800	Copper	0.1	
1200	Iron	1.2	
170	Lead	<0.3	<0.3
<0.02	Mercury		
30	Nickel	0.5	0.2
<0.02	Selenium		
1.8	Silver		<0.1
3400	Zinc	0.3	
⊖	Cyanide		

COMMENTS:

ORGANIC

	TOC		
<2.0	Anthracene		
<2.0	1,2-Diphenylhydrazine		
<0.025	Methylene Chloride		
<10.0	Methyl Ethyl Ketone		
<2.0	n-Nitrosodiphenylamine		
<2.0	Phenol		
<0.025	Tetrachloroethylene		
<0.025	Trichloroethylene		
<0.025	Chloroform		

	APPROVAL	DATE
Chemist	[signature]	6/2/89
Asst. Oper. Mgr.	[signature]	6/2/89
TSR	[signature]	6/6/89
Sales Mgr.	[signature]	6/6/89

ENVIRITE
TECHNOLOGY FOR THE ENVIRONMENT

ENVIRITE CORPORATION

16435 CENTER AVE.
HARVEY, IL 60426-6078
(312) 596-7040

INVOICE NUMBER
ES00970

ALL INQUIRIES AND CORRESPONDENCE MUST REFER TO THE ABOVE NUMBER

SOLD TO:

Amerdec
90 LeBaron
Waukegan, IL 60085
Attn: Accounts Payable

PICK-UP LOCATION:

Same

PICK-UP DATE	YOUR ORDER NO.	INVOICE DATE	TERMS	SHIPPED VIA
6/09/89		6/12/89	NET 30 DAYS	B/L H# 635

☒ OUR TRUCK
☐ OTHER

QUANTITY	DESCRIPTION	TREATMENT PRICE	AMOUNT
6 Bags	Treatment of Waste Filter Cake Sludge	$350/Bag	$2100.00
	IL Hazardous Waste Tax ($4.04 cu/yd)		24.24
	Manifest #4042349		
		TRANSPORTATION CHARGE	
		SALES TAX	
		TOTAL	$2124.24

ORIGINAL

ENVIRITE CORPORATION
16435 CENTER AVE.
HARVEY, IL 60426-6078
(312) 596-7040

INVOICE NUMBER
ES00527

ALL INQUIRIES AND CORRESPONDENCE MUST REFER TO THE ABOVE NUMBER

IT
ENV ENT

PLEASE REMIT TO:
P.O. BOX 8500 (S-1213)
PHILADELPHIA, PA 19178-1213

ierdec, Inc.
) LeBaron
ukegan, IL 60085

tention: Accounts Payable

PICK-UP LOCATION:

R ORDER NO.	INVOICE DATE	TERMS	SHIPPED VIA	
	04/07/89	NET 30 DAYS		☐ OUR TRUCK ☐ OTHER

DESCRIPTION	TREATMENT PRICE	AMOUNT
Analytical Fee - Sample Description: Contaminated Dirt & Resin, HS# 0367.		$250.00
	TRANSPORTATION CHARGE	
	SALES TAX	
	TOTAL	$250.00

ORIGINAL

ENVIRITE

EPA# ILD 000666206
IL SITE # 0311110001

SPECIAL INSTRUCTIONS

Authorization #000169

SOLIDS SERVICE PROPOSAL

Amerdec, Inc.
90 LeBaron
Waukegan, IL 60085

Attention: Maggie Allegrette Date: 03/28/89

Phone No.: (312) 623-6650

We propose to dispose of your waste, Contaminated Dirt & Resin, HS# 0367 subject to the terms and conditions as specified below and on the back of this sheet.

Minimum Volume per Pickup: 4 Bags Frequency: One Time Only

Treatment Price: $ 350.00 per ~~ton~~ Bag Lab Fee: ($250.00 Paid)

Taxes: $ 4.04 per cubic yard

Transportation: $ 450.00 per load includes one free hour at your site. Any additional time will be charged at $ 15.00 per quarter hour or part thereof.

All loads must conform with the characteristics of the original sample you submitted and be free of standing water, large stones, lumber, trash, and debris as these could possibly damage the processing units. Their presence could result in additional charges or rejection and return of the shipment.

The treatment price quoted above is based upon the makeup of your waste as represented in your sample that we have analyzed. Below are the factors that determine our treatment price to you. Any load that exceeds the following treatment specifications may be billed at a higher price due to additional treatment costs.

Max of 800 lbs./ton (reagent for stabilization) Max of ------ lbs./ton (reagent for oxidation)

Max of 300 lbs./ton (reagent for reduction) Max of ------ lbs. (sludge per processed ton)

Max of ------ Max of ------

Absence of Arsenic, Beryllium, Mercury, Selenium, Methylene Chloride, Trichloroethylene, Tetrachloroethylene, Methyl Ethyl Ketone, Anthracene, Phenol, 1, 2-diphenyl hydrazine, n-Nitrosodiphenyl amine, Carcinogens, Dioxin, Oils, P.C.B., Radioactives and/or Solvents is guaranteed by customer.

It is the responsibility of the customer to notify ENVIRITE CORPORATION of any changes in the nature of the waste or any contaminants present not indicated above.

We agree to certify in writing that your waste is nonhazardous after it has been treated by the ENVIRITE PROCESS, and the treated material has been tested to confirm its compliance with ENVIRITE's delisting.

ENVIRITE CORPORATION

By: _____
Technical Service Representative

Sales Manager
Douglas A. Newman

16435 South Center Avenue • Harvey, Illinois 60426 • (312) 596-7040

CUSTOMER EVALUATION SHEET

Merdec Inc.	HS367	03/08/89
r Name and Address	H #	Date
0 Le Baron	4 yds³	1 X
et	Volume	Frequency
Waukegan, IL 60085	Bags	
City, State, Zip	Tanker Type	

Chemical Description

Physical Description brown solid, small amount of paper and rock debris, 5

Special Handling Instructions

ANALYTICAL DATA

INORGANIC

		Filtrate	Leactate
0.8	Spec. Gravity		
6.5	ph		11.2
/	Normality		/
/	%		/
0.3	Arsenic		<0.1
210.	Barium		<1.0
280.	Cadmium		<0.02
15,000	Chromium		0.1
8,600	Chromium (+6)		<0.1
29,000	Copper		0.5
15,000	Iron		
630	Lead		<0.3
0.3	Mercury		<0.010
1,500	Nickel		0.2
0.03	Selenium		<0.01
1.0	Silver		0.1
6,000	Zinc		0.1
72	Cyanide non-amenable		0.9

ORGANIC

	TOC		
<2.0	Anthracene		
<2.0	1,2-Diphenylhydrazine		
<0.025	Methylene Chloride		
<10.0	Methyl Ethyl Ketone		
<2.0	n-Nitrosodiphenylamine		
<2.0	Phenol		
<0.025	Tetrachloroethylene		
<0.025	Trichloroethylene		

COMMENTS:

Note high FeSO4 demand 0.15

Using lime demands <0.4 result in Cd exceeding the compliance limit; with 0.4 lime demand, all parameters are in compliance.

	APPROVAL	DATE
Chemist		3/8/89
Lab Proc. Mgr.		3/9/89
TSR		
Sales Mgr.		3/25/89
Facility Mgr.		3/13/89

ENVIRITE CORPORATION
TECHNOLOGY FOR THE ENVIRONMENT

February 28, 1989

Maggie Allegretti
Amerdec
90 Lebaron
Waukegan, IL 60085

Dear Ms. Allegretti,

We have received both of your samples, and they have been submitted to our lab. We are estimating that it will take approximately three to five weeks for the samples to be completed.

If you have any questions, please call.

Sincerely,

Douglas Newman
Sales Manager

DAN:dew

16435 SOUTH CENTER AVENUE HARVEY, ILLINOIS 60426-6078 PHONE: (312) 596-7040

AMERDEC, INC

90 Le Baron
Waukegan, Il 60085
312 623 6650

January 25, 1989

Mr. Doug Newman
Envirite
16435 S. Center
Harvey, Il 60426

Dear Doug:

Two samples are being submitted -

#1 - it contains a sample of the ion exchange resin that we used when we serviced the accounts. They may contain some chrome, copper, zinc and maybe some n ckel - they may not contain any of these as we regenerated and plated out the heavy metals when we were in the service business.

We are not sure whether or not these particular resins were regenerated, however, as it was at the time we were moving from Chicago. We were going to re -regenerate them but have decided against it.

The last year we serviced any accounts was in 1985. We were in compliance with the Metropolitan Sanitary District.
We had a Special Waste Hauling number 1852 for carrying the tanks back and forth.
Our site # 03161603 and our other # was IL D005-167077.

We moved them from Chicago to Waukegan.

Sample 2 contains dirt or residue which came from the indexing filter that we used in our plant when we were recycling the resins that were brought back to us.

We have a new Federal # ILD 161401476

The U. S. EPA asked me whether or not you can certify a Closure plan for this material, I said that I would check this out with you.

Firstly, Doug, let us get the material packaged so that you can pick it up and we will proceed from there. They are granting me an extension of 30 days. Any help you can provide will be greatly appreciated.

Sincerely,

Maggie Allegretti

FOS

IN BARBARA

RCRA LAND DISPOSAL RESTRICTION INSPECTION

Facility: Amerdec Inc.

U.S. EPA I.D. No.: ILD161401476 (0971900034)

Street: 90 Le Baron

City: Waukegan State: Illinois Zip Code: 60085

Telephone: (312) 623-6060

Operator: Same

Street:

City: State: Zip Code:

Telephone:

Owner: John Keepper

Street: 465 Evanston

City: Lake Bluff State: Illinois Zip Code: 60044

Telephone: (312) 706-4940

Inspection Date: 11/8/89 Time: 10:30 am - 11:00 am Weather Conditions: 50°F Clear

	Name	Affiliation	Telephone
Inspectors:	Mary Glynn	IEPA	(312) 345-9780

Facility Representatives: Maggie Allegretti - President

	RCRA Status	LDR Status F-Solvent	LDR Status California List	First Third
Generator	X *			
Transporter				
Treater				
Storer	X		X	X F006
Disposer				

RECEIVED
NOV 28 1989
IEPA/DLPC

* sent stored waste off site
no longer generating.
generated D002 & F006 several years ago. stored until 6/9/89.

Revised 11-03-87

INSPECTION SUMMARY

For the past 2 years Amendec has stored F006 + D002 waste. This waste was shipped off site on 6/9/89 to Envirite in Harvey, Il for treatment.

Amendec has not generated any hazardous waste for over 2 years and will not generate any hazardous waste in the future.

No apparent LDR violations were cited.

For further information see the attached RCRA Narrative.

11/8/89
0971900034

NARRATIVE

Amerdec Inc. sells ion exchange equipment to industries that use water in their manufacturing process. This equipment includes ion exchange filters and cartridges. The company's current activities which are mostly sales and some assembling, generate no hazardous waste or nonhazardous special waste.

This company used to be called American Demineralizer and was located in Chicago (4425 W. Montrose). When operating under this name this company did take back the spent ion exchange filters from their customers, many of whom were electroplaters. American Demineralizer regenerated the resins in the columns by first back flushing the columns to remove the heavy "dirt", and then treating the resins with acids and caustics to remove the contaminants. The regeneration process generated primarily two waste streams: 1) an index filter waste collected from the back flushing activity, and 2) the acid and caustic waste water that was discharged to the sanitary sewer. The index filter waste was placed in drums throughout the facility, including outside the building. Some time in 1985, American Demineralizer went out of business. On April 23, 1986, Amerdec, Inc. was formed. (It was and is operated by the same individuals who operated American demineralizer.) In November of 1986, Amerdec moved to their present location (the subject of this inspection). They brought some drums (approximately seven (7)) of the index filter waste with them to their new location. Since the contaminants removed from the resins in the columns collectively are a wastewater treatment sludge (F006), and these contaminants were collected on the index filters, the subject site is a hazardous waste storage facility as a consequence of receiving the index filter waste from off-site.

Hazardous Waste Units

S01 - Container storage

1. Drums of spent resin used to be stored in a truck parked in back of the building (see 1/29/87 RCRA inspection report). No waste is currently stored here.

2. Drums of F006 waste used to be stored along the north fence in back of the building (see 1/29/89 RCRA inspection report). No waste is currently stored here.

3. 6 poly bags of F006 waste and 5 drums of spent chrome solution (D007) acquired from a past electroplating customer), and 2 drums of nonregenerated resin waste (F006) used to be stored inside the building. During a 3/16/89 inspection, manager, Thomas Allegretti claimed that these wastes were stored outdoors until approximately 2 years ago. During this inspection, no waste was in this area. A review of manifests showed that all waste was shipped off-site to Envirite on 6/9/89.

RECEIVED
NOV 28 1989
IEPA/DLPC

APPARENT VIOLATIONS

1. RCRA Violations

No new RCRA violations were observed during this inspection.

Although no hazardous wastes are currently generated, stored, transported or accepted from Off site, Amerdec is still regulated as a storage facility. The following storage violations are remaining from a 1/29/87 and a 3/16/89 inspection.

703.121	-	Conducting hazardous waste storage without a permit or interim status.
724.113(b)	-	No waste analysis plan.
724.115(a)	-	No inspections conducted in the storage area.
724.115(b)	-	No inspection schedule.
724.115(d)	-	No inspection records.
724.137	-	No arrangements with local authorities.
724.151(a)	-	No contingency plan.
724.153	-	No contingency plan on site or submitted to local authorities.
724.173	-	No operating record.
724.175	-	No annual reports submitted.
724.212(a)	-	No closure plan.
724.242(a)	-	No closure cost estimate.
724.274	-	No inspection in container storage area.
724.114(c)	-	No Danger signs posted in the container storage area.

The following violations cited in the 3/16/89 inspection were adequately addressed.

724.135	-	Since no hazardous wastes are stored on site, aisle space can no longs be considered inadequate.

II. CAFO Violations

Condition 5.

On September 9, 1988 a CAFO was issued for the above vioaltions. Condition #5 of this CAFO required Amerdec to submit a closure plan for their hazardous waste storage facility 45 days from the effective date of the agreement. As of the 3/16/89 inspection, no closure plan was submitted. The USEPA granted Amerdec an extension until 4/28/89. As of 8/22/89 this company still had not submitted a closure plan. A letter was sent on this date by the USEPA requesting that the closure plan be submitted within 30 days of receipt of the letter. At the time of this inspection documents verifying removal of hazardous wastes and soil sampling results form the outside storage area were presented but the facility still had no RCRA closure plan. Thus Amerdec is still in violation of condition 5 of the CAFO.

MG:bj:036J

RCRA LAND DISPOSAL RESTRICTION INSPECTION

APPLICABILITY CHECKLIST

Does the facility handle the following wastes?

not handled

		Gen.	Treat	Store	Disp.	Trans.
* A.	**F-Solvent Wastes**					
1.	F001	____	____	____	____	____
2.	F002	____	____	____	____	____
3.	F003	____	____	____	____	____
4.	F004	____	____	____	____	____
5.	F005	____	____	____	____	____

Note: Use Appendix A to determine whether the facility is misclassifying any of its wastes.

B. **California List Wastes**

1. Liquid hazardous waste (including free liquids associated with any solid or sludge) that contains the following metals at concentrations greater than or equal to those specified

		Gen.	Treat	Store	Disp.	Trans.
Arsenic	500 mg/L	____	____	____	____	____
Cadmium	100 mg/L	____	____	____	____	____
Chromium VI	500 mg/L	____	____	____	____	____
Lead	500 mg/L	____	____	____	____	____
Mercury	20 mg/L	____	____	____	____	____
Nickel	134 mg/L	____	____	____	____	____
Selenium	100 mg/L	____	____	____	____	____
Thallium	130 mg/L	____	____	____	____	____

2. Liquid hazardous waste (including free liquids associated with any solid or sludge) that contains free cyanides at concentrations greater than or equal to 1,000 mg/L

Gen.	Treat	Store	Disp.	Trans.
____	____	____	____	____

3. Liquid hazardous waste that has a pH of less than or equal to 2.0

____	____	✓	____	____

4. Liquid hazardous waste that contains PCBs at concentrations greater than or equal to

50 ppm	____	____	____	____	____
500 ppm	____	____	____	____	____

Does the facility mix liquid hazardous waste that contains PCBs with other types of wastes?

____ Yes ____ No ____ NA

If yes, state reasons for mixing:

_____

_____

5. Hazardous waste that contains HOCs greater than or equal to 1,000 mg/L (liquids) or 1,000 mg/kg (solids)

____	____	____	____	____

Note (1): The prohibitions of 268.32(a)(3) and (e) do not apply if the waste is also subject to the solvent restrictions of 268 Subpart C for a specific HOC.

Note (2): The effective date of regulation for liquid wastes with HOCs greater than or equal to 1,000 mg/L and less than 10,000 mg/L was July 8, 1987; the effective date for liquid wastes containing HOCs greater than or equal to 10,000 mg/L and solid wastes containing HOCs greater than 1,000 mg/kg is November 8, 1988.

C. **First Third Wastes**

Note: (1) The detailed description for waste codes are listed in Appendix C.
(2) EPA has promulgated the treatment standards for the following waste code with *.

	Gen.	Treat	Store	Disp.	Trans.
F006*			X		
F007					
F008					
F009					
F019					
K001*					
K004*					
K008*					
K011					
K013					
K014					
K015*					
K016*					
K017					
K018*					
K019*					
K020*					
K021*					
K022*					
K024*					
K025*					
K030*					
K031					
K035					
K036*					
K037*					
K044*					
K045*					
K046*					

RCRA LAND DISPOSAL RESTRICTION INSPECTION

GENERATOR CHECKLIST

GENERATOR REQUIREMENTS

A. **BDAT Treatability Group - Treatment Standards Identification**

Not Handled

1. F-Solvent Wastes: Does the generator correctly determine the appropriate treatability group of the waste?

   ____ Yes ____ No ____ NA

   If yes, check the appropriate treatability group.

   ____ Wastewaters containing solvents (less than or equal to 1% TOC by weight)
   ____ Pharmaceutical wastewater containing spent methylene chloride
   ____ All other spent solvent wastes

2. California List Wastes: Does the generator correctly determine the appropriate treatment standard of the waste?

   a. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 50 but less 500 ppm, is the treatment in accordance with existing TSCA thermal treatment regulations for burning in high efficiency boilers (40 CFR 761.60) or incineration (40 CFR 761.70)?

      ____ Yes ____ No ✓ NA

      If yes, specify the method: _____

   b. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 500 ppm, is the waste incinerated or disposed of by other approved alternate methods (40 CFR 761. 60 (e))?

      ____ Yes ____ No ✓ NA

      If yes, specify the method and state whether the facility has submitted a written request to the Regional Administrator or Assistant Administrator for an exemption from the incineration requirement:

      _____
      _____
      _____

3. First Third Wastes: Does the generator correctly determine the appropriate treatability group of the waste?

✓ Yes ____ No ____ NA

If yes, check the appropriate treatability group.

____ Wastewater (less than 1% TOC by weight and less than 1% filterable solids)
✓ Nonwastewaters

List the waste code and check the correct treatment standard group.

Waste Code	Wastewater	Nonwastewater
F006		✓

B. **Waste Analysis**

not handled

1. F-Solvent Wastes

a. Does the generator determine whether the F-solvent waste exceeds treatment standards?

____ Yes ____ No ✓ NA

How was this determination made?

- Knowledge of waste

____ Yes ____ No NA ✓

If yes, is any supporting data available for review? Describe how this is adequate.____

- TCLP

____ Yes ____ No NA ✓

If yes, provide the date of last test, the frequency of testing, and note any problems. Attach test results.

b. Does the F-solvent waste exceed applicable treatability group treatment standards upon generation [268.7(a)(2)]?

____ Yes ____ No ✓ NA

If yes, specify the waste stream: _____

c. Does the generator dilute the F-solvent waste as a substitute for adequate treatment [268.3]?

____ Yes ____ No ✓ NA

d. How does the generator test F-solvent waste when a process or waste stream changes?

_____

_____

_____

2. California List Wastes

a. Does the generator determine whether the waste is a liquid according to the Paint Filter Liquids Test (PFLT method 9095) as described by SW-846?

____ Yes ✓ No ____ NA

NO PFLT

b. If the waste is determined to be a liquid according to PFLT, is an absorbent added to the waste?

____ Yes ____ No ✓ NA

What type of absorbent is used? _____

Check the types of waste to which absorbent is added.

___ Liquid hazardous waste having a pH less than or equal to 2

___ Liquid hazardous waste containing metals

___ Liquid hazardous waste containing free cyanides

c. Does the generator determine whether the concentration levels (not extract or filtrate) in the waste equal or exceed the prohibition levels or whether the waste has a pH of less than or equal to 2.0 based on:

- Knowledge of wastes

✓ Yes ____ No ____ NA

If yes, is any supporting data available for review? Describe how this is adequate. waste analyses

- Testing ✓

  ____ Yes ____ No ____ NA

  If yes, list test method used: PH

NO PFLT

d. Does the generator determine if concentration levels in the PFLT filtrate exceed cyanide and metals concentration levels?

   ____ Yes ____ No ____ NA

   - If yes, list test method used and constituent and concentration levels that exceeded prohibition levels: ____

e. Does the generator dilute the waste as a substitute for adequate treatment [268.3]?

   ____ Yes ____ No ____ NA

3. First Third Wastes:

   a. Does the generator correctly determine the appropriate treatment standard of the waste?

      ✓ Yes ____ No ____ NA

      Note: The treatment standards for first third wastes are given in Appendix D.

   b. Does the generator determine whether the First Third waste exceeds treatment standards upon generation?

      ✓ Yes ____ No ____ Soft hammer

      If yes, specify the waste stream: F006

      How was this determination made?

      - Knowledge of waste

        ✓ Yes ____ No

        If yes, is any supporting data available for review? Describe how this is adequate. waste analysis

- TCLP

✓ Yes ____ No ____ NA

- Total Constituent Analysis

✓ Yes ____ No ____ NA

Provide the date of last test, the frequency of testing, and note any problems. Attach test results.

One time only testing January of 1989
Test results not attached.

c. Does the generator dilute the waste as a substitute for adequate treatment [268.3]?

____ Yes ✓ No ____ NA

d. How does the generator test the waste when a process or waste stream changes?

This company will not generate any more hazardous waste.

C. **Management**

1. On-Site Management

Is restrict waste or waste that exceeds the treatment standards treated, stored, or disposed on-site?

____ Yes ✓ No

If yes, the TSD Checklist must be completed.

2. Off-Site Management

a. Does the generator ship any waste that exceeds the treatment standards to an off-site treatment or storage facility?

✓ Yes ____ No

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

✓ Yes ____ No

c. Does notification contain the following?

EPA Hazardous waste number(s)	✓ Yes	____ No
Applicable treatment standards	✓ Yes	____ No
Manifest number	✓ Yes	____ No
Waste analysis data, if available	✓ Yes	____ No

Identify off-site treatment or storage facilities: Envirite in Harvey, Il

no disposal shipments

d. Does the generator ship any waste that meets the treatment standards to an off-site disposal facility?

____ Yes ✓ No

e. Does the generator provide notification and certification to the disposal facility [268.7(a)(2)]?

____ Yes ____ No

f. Does notification contain the following?

EPA Hazardous waste number(s)	____ Yes	____ No
Applicable treatment standards	____ Yes	____ No
Manifest number	____ Yes	____ No
Waste analysis data, if available	____ Yes	____ No
Certification that the waste meets treatment standards	____ Yes	____ No

Identify off-site land disposal facilities: _____

g. Is the waste subject to a nationwide variance, case by case extension (268.5), or petition (268.6)?

____ Yes ____ No ____ NA

h. If yes, does the generator provide notification to the off-site receiving facility that the waste is not prohibited from land disposal [268.7(a)(3)]?

____ Yes ____ No

i. If yes, does the notification contain the following information?

EPA Hazardous waste number	____ Yes	____ No
The corresponding treatment standards and all applicable prohibitions	____ Yes	____ No
Manifest number	____ Yes	____ No
Waste analysis data, if available	____ Yes	____ No
Date the waste is subject to the prohibitions	____ Yes	____ No

j. Does the generator retain copies of all notices and certifications for a period of 5 years?

____ Yes ____ No

D. <u>Demonstration and Certification -- "Soft Hammer" Wastes</u>

a. Has the generator attempted to locate and contract with treatment and recovery facilities that provide treatment that yields the greatest environmental benefit [268.8(a)(1)]?

✓ Yes ____ No

b. Has the generator submitted to the Regional Adminstration a demonstration and certification containing the following information to document its efforts to locate practically available treatment:

A list of facilities and facility officials contacted?	✓ Yes	____ No
Addresses	✓ Yes	____ No
Telephone Numbers	✓ Yes	____ No
Contact dates	✓ Yes	____ No

Attach a copy of the demonstration and certification - not available

c. If the generator has determined that there is no practically available treatment for its wastes, has it sent documentation to EPA demonstrating why it was not able to obtain treatment or recovery for the waste?

____ Yes ____ No NA ✓ available treatment was found

If yes, attach a copy of written discussion.

d. Does the generator ship his waste off-site for treatment?

✓ Yes ____ No

Describe the type of treatment and treatment facilities Envirite in Harvey Il

e. Did the generator send a copy of its demonstration and certification to the receiving facility with the first shipment of waste?

✓ Yes ____ No

f. Does the generator provide certification with each subsequent shipment of wastes?

e. There will be no subsequent shipments

____ Yes ____ No NA ✓

g. Does the generator provide the following notification to the receiving facility with each shipment of waste?

(i) EPA Hazardous waste number ✓ Yes ____ No

(ii) Manifest number ✓ Yes ____ No

(iii) Waste analysis data, if available ✓ Yes ____ No

h. Does the generator retain copies of all notices, demonstrations, and certifications for a period of 5 years?

✓ Yes ____ No

E. **Treatment Using RCRA 264/265 Exempt Units or Processes**
(i.e., boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.)

Are treatment residuals generated from units or processes exempt under RCRA 264/265?

____ Yes ____ No NA ✓ No such treatment

If yes, list types of waste treatment units and processes:

RCRA LAND DISPOSAL RESTRICTION INSPECTION

TSD CHECKLIST

TSD REQUIREMENTS

A. <u>General Facility Standards</u>

1. Does the waste analysis plan cover Part 268 requirements [264.13 or 265.13]?

   o F-solvent ____ Yes ____ No ____ NA

   o California List ____ Yes ____ No ____ NA

   o First Third ____ Yes ____ No ✓ NA NO waste analysis Plan

2. Does the facility obtain representative chemical and physical analyses of wastes and residues?

   ✓ Yes ____ No Envirite (Harvey, Il) Sampled in Jan, 1989

   a. What date was the waste analysis plan last revised? NO written Plan

   b. Are analyses conducted on-site or off-site?

   ____ On-site ✓ Off-site

   Identify off-site lab: Envirite in Harvey, Il

   c. Is F-solvent waste analyzed using TCLP? NO F solvent waste

   ____ Yes ____ No ✓ NA

   d. Is First Third waste analyzed using the analytical method that is appropriate for the objective of the specified BDAT (i.e., total constituent analysis for destruction technologies and TCLP for stabilization/fixation technologies)?

   ✓ Yes ____ No ____ NA

   Note: The appropriate analytical methods (TCLP or total constituent) for first third wastes with specified treatment standards are given in Appendix D.

   e. Describe the frequency of sampling: Waste sampled one time only Jan, 1989

3. Are the operating records, including analyses and quantities, complete [264.73/265.73]?

____ Yes ____ No ✓ NA no operating record

B. **Storage** (268.50)

1. Are restricted wastes stored on-site?

____ Yes ✓ No waste no longer stored on site.

If no, go to C, Treatment.

2. If yes, check the appropriate method.

____ Tanks
____ Containers

3. Are all containers clearly marked to identify the contents and date(s) entering storage?

____ Yes ____ No ✓ NA

4. Do operating records track the location, quantity of the wastes, and dates that the wastes enter and leave storage?

____ Yes ____ No ✓ NA no operating record

5. Do operating records agree with container labeling?

____ Yes ____ No ✓ NA

6. Do operating records contain copies of the notice, certification, and demonstration (if applicable) from the generator for the past 5 years?

____ Yes ____ No ✓ NA

7. Have wastes been stored for more than 1 year since the applicable LDR regulations went into effect?

soft hamma first third waste.

____ Yes ✓ No ____ NA

If yes, can the facility show that such accumulation is necessary to facilitate proper recovery, treatment, or disposal?

effective date May 8, 1990

____ Yes ____ No

If yes, state how: _____

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

____ Yes ____ No ✓ NA

no Tanks

If yes, do the operating records show that the volume of waste removed from tanks annually equals or is more than the tank volume?

____ Yes ____ No

9. Are all tanks clearly marked with a description of the contents, the quantity of wastes received, and date(s) entering storage, or is such information recorded and maintained in the operating record?

____ Yes ____ No ____ NA

_____

C. <u>Treatment</u>

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

NO Treatment

____ Yes ____ No

If no, go to D, Treatment in Surface Impoundments.

8. Does the facility ship any "soft hammer" waste to an off-site disposal facility?

____ Yes ____ No ____ NA

If yes, does the treatment facility send a copy of the generator's demonstration (if applicable) and certification to the disposal facility?

____ Yes ____ No

D. **Treatment in Surface Impoundments**

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

____ Yes ____ No

If no, go to E, Land Disposal.

2. If yes, did the facility submit to the Agency the waste analysis plan and certification of compliance with minimum technology and ground-water monitoring requirements?

____ Yes ____ No

3. If the minimum technology requirements have not been met, has a waiver been granted for that unit?

____ Yes ____ No ____ NA

4. Are representative samples of the sludge and supernatant from the surface impoundment tested separately, acceptably, and in accordance with the sampling frequency and analysis specified in the waste analysis plan?

____ Yes ____ No

Attach test results.

5. Do the hazardous waste residues (sludges or liquids) exceed the treatment standards specified in 268.41, or where no treatment standards are established for a waste, the applicable prohibition levels?

____ Yes ____ No

E. **Land Disposal**

1. Are restricted wastes placed in land disposal units such as landfills, surface impoundments, waste piles, wells, land treatment units, salt domes/beds, mines/caves, or concrete vault or bunker?

   ____ Yes ____ No

   Note: Do not include surface impoundments addressed in D, Treatment in Surface Impoundments.

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

2. Are these wastes disposed of in a new, replacement, or laterally expanded landfill or impoundment that meets the minimum technology requirements (double liner and leachate collection) and groundwater monitoring?

   ____ Yes ____ No

3. Does the facility operating record have notices, certifications, and demonstration (if applicable) from generators/storer/treaters for 5 years [268.7(c); 268.7(a),(b)]?

   ____ Yes ____ No

4. Does the facility obtain waste analysis data or test the wastes (according to the waste analysis plan) to determine that the wastes comply with the applicable treatment standards [268.7(c)]?

   ____ Yes ____ No

   If yes, at what frequency? _____

5. If restricted wastes that exceed the treatment standards are placed in land disposal units (excluding national capacity variances) [268.30(a)], does facility have an approved waiver based on no migration petition [268.6], an approved case-by-case capacity extension [268.5], or variance [268.44]?

   ____ Yes ____ No

6. Does the facility dispose of restricted wastes that are subject to a national capacity variance?

   ____ Yes ____ No

AMERDEC, INC

90 Le Baron
Waukegan, Il 60085
312 623 6650
Fax 312 623 6368

RECEIVED
SEP 20 1989
OFFICE OF RCRA
WASTE MANAGEMENT DIVISION
EPA, REGION V

September 18, 1989

Mr. William E. Muno, Chief
RCRA Enforcement Branch
United States Environmental
Protection Agency
Region 5
230 S. Dearborn St
Chicago, Il 60604

Re: Amerdec, Inc
ILD 161 401 476
CAFO Docket # V-W-88-R-018

Dear Mr. Muno:

Per my telephone conversation with Ms. Russell on the above date -

There is a very small area in the rear of our plant on which the 4 drums of chromic acid sat.

We are in the process of having the soil checked by sending samples to Gabriel Labs in Kenosha, Wisconsin, these samples are being sent out today. If there is any contamination of the soil we will know how to proceed. This is the last procedure that has to be done because all other substances have long been removed from these premises.

I have all of the documentation on the removal of the materials from these premises, copies of which will be submitted as one of the steps in the "closing procedures".

I will need some additional time before the final closing can proceed, some tests were previously taken on the soil but they were lost or didn't arrive at the lab.

I will keep Ms. Russell informed as to the results of the soil testing as soon as they are received.

A P.E. will be contacted and will verify all documentation that we already have plus the information about the soil samples.

I hope the above information is adequate for this particular time.

Very truly yours,

Magdalena Allegretti

Mrs. M. Allegretti

MA:ma

B. Russell (SHR-12)

P 155 069 808

RECEIPT FOR CERTIFIED MAIL

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

Sent to Magdalene Allegretti	
Street and No. 90 LeBaron	
P.O., State and ZIP Code Waukegan, IL 60085	
Postage	$ .25
Certified Fee	.85
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	.90
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	$ 2.00
Postmark or Date	

CHICAGO, IL LOOP STA. 1 AUG 22 1989

PS Form 3800, June 1985

SENDER: Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.
Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.
1. ☐ Show to whom delivered, date, and addressee's address. ↑*(Extra charge)*↑
2. ☐ Restricted Delivery ↑*(Extra charge)*↑

3. Article Addressed to:
Mrs. Magdalene Allegretti
Amerdec, Inc.
90 LeBaron
Waukegan, IL 60085

4. Article Number
P155 069 808

Type of Service:
☐ Registered ☐ Insured
☒ Certified ☐ COD
☐ Express Mail

Always obtain signature of addressee or agent and DATE DELIVERED.

5. Signature — Addressee
X M. Allegretti

6. Signature — Agent
X

7. Date of Delivery
8-24-89

8. Addressee's Address *(ONLY if requested and fee paid)*

PS Form **3811**, Mar. 1987 ★ U.S.G.P.O. 1987-178-268 **DOMESTIC RETURN RECEIPT**

UNITED STATES POSTAL SERVICE

OFFICIAL BUSINESS

SENDER INSTRUCTIONS

Print your name, address, and ZIP Code in the space below.

- Complete items 1, 2, 3, and 4 on the reverse.
- Attach to front of article if space permits, otherwise affix to back of article.
- Endorse article "Return Receipt Requested" adjacent to number.

U.S.MAIL

PENALTY FOR PRIVATE USE, $300

RETURN TO

Print Sender's name, address, and ZIP Code in the space below.

Barbara Russell (5HR-12)
U.S. EPA
230 S. Dearborn, Chicago, IL
60604

CERTIFIED MAIL
Return RECEIPT REQUESTED

NOT. '84 + '89

22 AUG 1989

5HR-12

Mrs. Magdalene Allegretti
Amerdec, Inc.
90 LeBaron
Waukegan, Illinois 60085

Re: Amerdec, Inc.
ILD 161 401 476
CAFO Docket No.: V-W-88-R-018

Dear Mrs. Allegretti:

During a telephone conversation with Mr. Doug Newman of Envirite and Ms. Barbara Russell of my staff, Mr. Newman indicated to Ms. Russell that the resinous and nonresinous waste have been removed from Amerdec, Inc. Now that the above-mentioned waste has been removed, items #3 and #4 of the Consent Agreement and Final Order (CAFO) appears to have been satisfied, however, item #5 of the CAFO remains outstanding. Item #5 of the CAFO required you to submit a closure plan for the hazardous waste storage facility and certify closure from an independent registered professional engineer as required by 35 Ill. Adm. Code 725 et seq.

The United States Environmental Protection Agency (U.S. EPA) requests that Amerdec, Inc., immediately address this requirement of the CAFO. Failure to comply with all of the requirements of the CAFO is considered a serious violation by this Agency.

Amerdec, Inc., is hereby requested to submit to the U.S. EPA and to the Illinois Environmental Protection Agency documentation demonstrating compliance with item #5 of the CAFO. This documentation is required to be submitted within 30 days after the receipt of this letter. Failure to comply with this request, may result in further enforcement action with substantial penalties.

If you have any questions concerning this matter, please contact Ms. Russell at (312) 353-7922.

Sincerely yours,

William E. Muno, Chief
RCRA Enforcement Branch

cc: Harry Chappel, IEPA, CMS
Glenn Savage, IEPA, FOS
John Maher, IEPA, Maywood Office

5HR-12:B.RUSSELL:ev:8/15/89:3-7928:FILENAME: Allegretti

EV 8-17-89

RCRA ENFORCEMENT	REB STAFF	REB SECTION CHIEF	REB CHIEF
INIT. DATE	BL 8/14/89	PCR 8-21-89	WEM 8/21/89

AMERDEC, INC

90 Le Baron
Waukegan, Ill 60085
312 623 6650

RECEIVED
MAY 24 1989
OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION V

May 23, 1989

Mr. Richard J. Clarizio
Asst. Regional Counsel
United States EPA
230 S. Dearborn St
Chicago, Il 60604

Dear Mr. Clarizio:

This is to inform you that once again there is to be a delay in picking up the material that we have on our premises, for this I profoundly apologize. I know this is over and above the extension time that was given to us.

Last November I submitted a sample of the chromic acid solutions to Envirite, they cannot find the lab report of the acid having been processed through the lab. I know, at the time, that one of the bottles did break but one was left intact. I was under the impression that there was enough of the material left to be able to be processed but whether or not they discarded it I do not know. Mr. Newman checked the lab reports and cannot find any of the data.

I was unaware of this situation until a proposal was submitted by Envirite to pick up the material and which did not include the chromic acid drums. It took me several weeks to reach Mr. Newman and I was also out of town one week. The chromic acid drums have always been a part of this pick up of material, it is contained in the required DOT drums.

I have to again submit a sample to Envirite, they promised to pick up the sample personally on Thursday, May 25th and Mr. Newman promised a priority handling of processing it through their lab. He spoke to Ms. Russell on May 22nd and I believe explained these circumstances, Miss Russell stated that the matter was out of her hands,

As soon as this material is picked up I will call them every day to find out the specific date on which this material is to be picked up and I will keep you informed. This situation may seem like carelessness but I assure you it is not. We are anxious to have these materials removed as they are sitting in their bags and drums and take up a lot of our space.

As to the Closure, as soon as I receive all of the information from Envirite as to the Manifest and lab findings I will submit and contact the State of Illinois to see what additional material is required.

I realize that this has been long drawn out but hopefully it can be resolved within 2 weeks.

Sincerely,

Magdalena Allegretti

cc. Ms. L. Russell

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

217/782-5544

RECEIVED
MAY 08 1989
U.S. EPA, REGION V
WASTE MANAGEMENT DIVISION
OFFICE OF THE DIRECTOR

Refer to: 0971900034 -- Lake County
Waukegan/Amerdec
ILD 161401476
Compliance File

REFERRAL UPDATE

May 5, 1989

Mr. Basil Constantelos, Director
Waste Management Division
U.S. Environmental Protection Agency
Region V
230 South Dearborn
Chicago, Illinois 60604

Dear Mr. Constantelos:

On September 9, 1988 a Consent Agreement and Final Order was agreed to by Amerdec and USEPA.

The IEPA conducted an inspection at the Waukegan Amerdec facility on March 16, 1989. A copy of the inspection report is enclosed to keep you updated on the status of the above referenced facility.

Any questions regarding the March 16, 1989 inspection can be directed to Ms. Mary Glynn of the IEPA's Maywood office. The telephone number is 312/345-9780.

Very truly yours,

Gary P. King

Gary P. King
Senior Attorney
Enforcement Programs

GPK:PRJ:bh:3614B

cc: Maywood Region
Angela Tin
Mary Glynn
DLPC Division File
Docket Control (Linda Cooper)
Paul Jagiello

Gary King

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

MEMORANDUM

DATE: April 3, 1989

TO: Gary King

FROM: Mary Glynn, FOS, Maywood M. G.

SUBJECT: 0971900034/Lake County
Waukegan/Amerdec Inc
COMPLIANCE
ILD061404976

APR 14 1989

1701 FIRST AVENUE
MAYWOOD, ILLINOIS 60153

FOS Reccommendations

Based on the information submitted below, FOS reccomends that the USEPA be updated on the status of the above referenced facility.

Background

On 3/16/89 an inspection was conducted to determine compliance with applicable RCRA regulations and a CAFO issued on September 9, 1988.

The following RCRA violations, originaly cited during a 1/29/87 inspection had not yet been addressed....

703.121	724.151a
724.113b	724.153
724.114c	724.173
724.115a	724.175
724.115b	724.212a
724.115d	724.242a
724.135	724.274
724.137	

The following RCRA violations originaly cited during the 1/29/87 inspection appeared to be adequately addressed....

723.112	724.176
723.120	724.114b
724.111	724.131
724.113a	724.271
724.114a	724.273

In regards to the 9/9/88 CAFO... the following was noted.

1. The company is in compliance with conditions 1 and 2

2. The company was in apparent violation of condition 3 because the non resinuous waste was still on site. (It was to be removed within 45 days from the effective date of the order)

3. The company is in apparent violation of condition #4 of the order because no arrangements were made for on-site pre-treatment of the resinous waste. (A Permit application was to be submitted to IEPA 15 days after the order's effective date, the necessary equipment was to be installed within 60 days of the effective date and pre-treatment was to be completed within 15 days of IEPA's final approval).

CONFIDENTIAL

IL 532-0570
EPA-90 (Rev. 6/75-20M)

4.* The company had been in apparent violation of condition #5 of the order because they did not submit a closure plan within 45 days of the effective date. However USEPA granted an extension until April 28, 1989.

It should be noted that at the time of this inspection, all hazardous waste was stored indoors. The manager claimed that the waste had been stored in its present location for approximately 2 yrs. Thus the closure plan must address the present storage area and any other past areas where storage had occured.

Summary

FOS reccomends that the above information be submitted to the USEPA

MG:lb:4

cc: Division File
Region File
Glenn Savage
Paul Jagiello
HWRC

* The April 28, 1989 extension addresses CAFO conditions 3 and 4 as well as condition 5. USEPA recognizes that the company no longer intends to pre-treat their resinuous waste. (see attached letter)

THIS FACILITY IS CURRENTLY WITHIN THEIR COMPLIANCE SCHEDULE DUE TO THE EXTENSION. MM 4-6-89

CONFIDENTIAL

~~0977900034~~ - Lake

17 MAR 1989

5RA-14

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

RECEIVED
MAR 20 1989
P.C.
STATE OF ILLINOIS

Mrs. Magdalene Allegretti
Amerdec Incorporated
90 LeBaron
Waukegan, Illinois 60085

Re: Amerdec, Inc.
ILD 161 401 476
CAFO, Docket NO. V-W-88-R-018

Dear Mrs. Allegretti:

We are in receipt of your letter dated January 26, 1989, requesting an extension up to April 28, 1989, to complete items #3, #4 and #5 in the above-referenced Consent Agreement and Final Order (CAFO). Based upon your letter, we understand that you no longer wish to pretreat the resinous waste and will be shipping it off-site with the nonresinous waste. We also understand that the extension of time is needed to repackage the waste on site to meet the requirements of your waste hauler, Envirite. We further understand that you need the additional time to submit a closure plan to the Illinois Environmental Protection Agency (IEPA) for approval, and to certify closure from a Registered Independent Professional Engineer as, required by item #5 of the CAFO.

Having assessed your reasons for an extension, and your efforts towards satisfying items #3, #4 and #5 in the CAFO, I hereby approve an extension up to April 28, 1989. In no way will this extension affect any other deadline set forth in the CAFO. Failure to comply with the terms of the CAFO and this extension of time may result in further enforcement action with substantial penalties. If you have any questions concerning this matter, please contact Ms. Barbara Russell at (312) 353-7922.

Sincerely yours,

/s/ original signed by
V[illegible] V. Adamkus

Valdas V. Adamkus
Regional Administrator

cc: Harry Chappel, IEPA, CMS
Glen Savage, IEPA, FOS
John Maher, IEPA, Maywood Office

Ms. Barbara Russell SHR-12

P 250 862 566

RECEIPT FOR CERTIFIED MAIL

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

Sent to Mrs. Magdalene Allegretti	
Street and No. 90 LeBaron	
P.O., State and ZIP Code Waukegan, Illinois 60085	
Postage	25
Certified Fee	85
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	90
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	2.00
Postmark or Date	

★ U.S.G.P.O. 1985-480-794

PS Form 3800, June 1985

SENDER: Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.
Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.
1. ☐ Show to whom delivered, date, and addressee's address. ↑*(Extra charge)*↑
2. ☐ Restricted Delivery ↑*(Extra charge)*↑

3. Article Addressed to:
Mrs. Magdalene Allegretti
Amendec Incorporated
90 LeBaron
Waukegan, Illinois 60085

4. Article Number
P 250 862 566

Type of Service:
☐ Registered ☐ Insured
☒ Certified ☐ COD
☐ Express Mail

Always obtain signature of addressee or agent and DATE DELIVERED.

5. Signature — Addressee
X M. Allegretti

6. Signature — Agent
X

7. Date of Delivery
3/20/89

8. Addressee's Address *(ONLY if requested and fee paid)*

PS Form **3811**, Mar. 1987 ★ U.S.G.P.O. 1987-178-268 **DOMESTIC RETURN RECEIPT**

UNITED STATES POSTAL SERVICE

OFFICIAL BUSINESS

SENDER INSTRUCTIONS

Print your name, address, and ZIP Code in the space below.

- Complete items 1, 2, 3, and 4 on the reverse.
- Attach to front of article if space permits, otherwise affix to back of article.
- Endorse article "Return Receipt Requested" adjacent to number.

U.S.MAIL

PENALTY FOR PRIVATE USE, $300

RETURN TO

Print Sender's name, address, and ZIP Code in the space below.

Ms. Barbara Russell (SHR-12)

UNITED STATES OF AMERICA
ENVIRONMENTAL PROTECTION AGENCY
230 S. DEARBORN
CHICAGO, ILLINOIS 60604

17 MAR 1989

5RA-14

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mrs. Magdalene Allegretti
Amerdec Incorporated
90 LeBaron
Waukegan, Illinois 60085

Re: Amerdec, Inc.
ILD 161 401 476
CAFO, Docket NO. V-W-88-R-018

Dear Mrs. Allegretti:

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Sincerely yours,
/s/ original signed by
Valdas V. Adamkus

Valdas V. Adamkus
Regional Administrator

cc: Harry Chappel, IEPA, CMS
Glen Savage, IEPA, FOS
John Maher, IEPA, Maywood Office

3/17/89.

17 MAR 1989
PM

bcc: Richard Clarizio, ORC

CW 3-14-89 EP 3-15-89 3/16/89

5HR-12:B. RUSSELL:or:02/09/89:3-7925:DISK #3:PC FILENAME:mallegreti

	TYP.	AUTH.	IL/IN TECH. ENF. SEC.	MI/WI TECH. ENF. SEC.	OH/MN TECH. ENF. SEC.	IL/MI/WI ENF. PROG. SECTION	IN/MN/OH ENF. PROG. SECTION	RCRA ENF. BR. CHIEF	O.R. A.D.D.	WMD DIR
INIT. DATE	3/9/89	3/9/89				P.E.D. 3-9-89		WEY 3/13/89	DAH 3/14/89	

5RA CW 3/17/89

STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY
INSPECTION REPORT

USEPA Number: ILD161401476 IEPA Number:: 0971900034

Facility Name: Amerdec Inc.

Street: 90 LeBaron
City: Waukegan Telephone: 312/623-6650
County: Lake State: Il ZipCode: 60085

Type of Facility: Notified as: Non-Notifier Regulated as: S, (Tr)
LDF? N HPV? Y 90 Day Follow-up required? Yes: ___ No: ✓

Region: II Date of Inspection: 3/16/89 From: 9:30 am to: 11:00 am
Weather (LDF Only): 40°F Sunny

Type of Inspection
ISS: ✓ Sampling: ___ Citizen Complaint: ___ Closed: ___ Other: ___
Record Review: ___ Follow-up to Inspection of: ___ Withdrawal: ___

Non Regulated Status
SQG: ___ Claimed Nonhandler: ___ Other (Specify in Narrative): ___

Notification date, 6/7/88, from (initial) or (subsequent) Notif.

Part A
Initial Part A date: — Ammended: —
Part A Withdrawal requested: — Approved by (US)(IL)EPA: —

Part B Permit Application
Part B Permit called by (US)(IL)EPA on: — Permit Due: —
Part B Permit Submitted: — Draft Permit Issued: —

Enforcement
Has the firm been referred to: USEPA? Y IAG? ___ County SA? ___
Date(s) of initial referral: ___ ___ ___
USEPA CACO: 7/28/87 CAFO: 9/9/88 ALJ Decision: ___
Referral to DOJ by USEPA: — Federal Court Order Issued: —
PCB Order Issued: — State Court Order Issued: —

TSD Facility Activity Summary

Activity By Process Code	On Pt A?	Activity Conducted Prior to 1980?	Was Activity Ever Done?	Closed	Being Done at Time of Insp?	Exempt per 35 IAC, Sec.	On Annual Report 88	87	86
S01	N	N	Y	N	Y	N	N	N	N

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
LAND POLLUTION CONTROL/FOS

VIOLATION CORRELATION SHEET

VIOLATIONS	SUMMARY OF VIOLATIONS	NARRATIVE	INSPECTION CHECKLIST	(CAFO 9/9/88) EDG memo ~~PECL/OIL~~	COMMENTS
703.121	✓	✓	✓	✓	continuing violations from 1/29/87 RCRA inspection
724.113 b	✓	✓	✓	✓	
724.114 c	✓	✓	✓	✓	
724.115a	✓	✓	✓	✓	
724.115 b	✓	✓	✓	✓	
724.115d	✓	✓	✓	✓	
724.135	✓	✓	✓	✓	
724.137	✓	✓	✓	✓	
724.151a	✓	✓	✓	✓	
724.175	✓	✓	✓	✓	
724.153	✓	✓	✓	✓	
724.173	✓	✓	✓	✓	
724.212a	✓	✓	✓	✓	
724.242a	✓	✓	✓	✓	
724.274	✓	✓	✓	✓	
[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	
[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]

*NOTE: Include in Inspection Packet.

Operator: Amerdec Inc. Telephone #: 623-6650 (312)

Street: 90 Le Baron

City: Waukegan State: Il Zip Code: 60085

Owner: John Keeppen Telephone #: (312) 706-4940

Street: 465 Evanston

City: Lake Bluff State: Il Zip Code: 60044

Person Interviewed	Title	Telephone #
Tom Allegretti	Manager	623-6650 (312)
Maggie Allegretti	President	" "

Inspection Participants	Agency/Title	Telephone #
Mary Glynn	IEPA /EPS I	(312)345-9780

Prepared By	Agency/Title	Telephone #
"		"

Summary of Apparent Violations

Area	Class	Section
Oth	1	703.121
Oth	1	724.113b
Oth	1	724.114c
Oth	2	724.115a
Oth	2	724.115b
Oth	2	724.115d
Oth	1	724.135
Oth	2	724.137
Oth	1	724.151a

Area	Class	Section
Oth	2	724.175
Oth	2	724.163
Oth	2	724.173
Cl/pc	1	724.212a
Fin	1	724.242a
Oth	2	724.274

All above violations are continuing from 1/29/87 inspection.

Area	Class	Section
[redacted]		
[redacted]		
[redacted]		

WASTE DISPOSITION FORM

Facility N Amerdec Inc. USEPA #: Non Notifier IEPA #: 0971900034

Waste Name (Include haz & non-haz special & waste for which no determination has been made)	Generating Process (For waste gen. on site. N/A for TSD)	Date of Last Analysis	USEPA Haz Waste #	* On 8700-12 *	* On 3510-3 *	* On Annual Rpt. for 88 *	* 87 *	* 86 *	Amount on Site	Rate of Generation	Last Manifested Shipment	Disposition
spent resins	removed from ion exchange columns	Jan 1989	F006	NA	NA	N	N	N	2 drums	No longer generated		none to date But arrangements are being made with Envirite for disposal
spent chrome solution	aquired from a past customer who did electroplating		D007						5 drums			
filter waste	cleaned off of filters		F006						6 Poly Bags			

* = No such document submitted

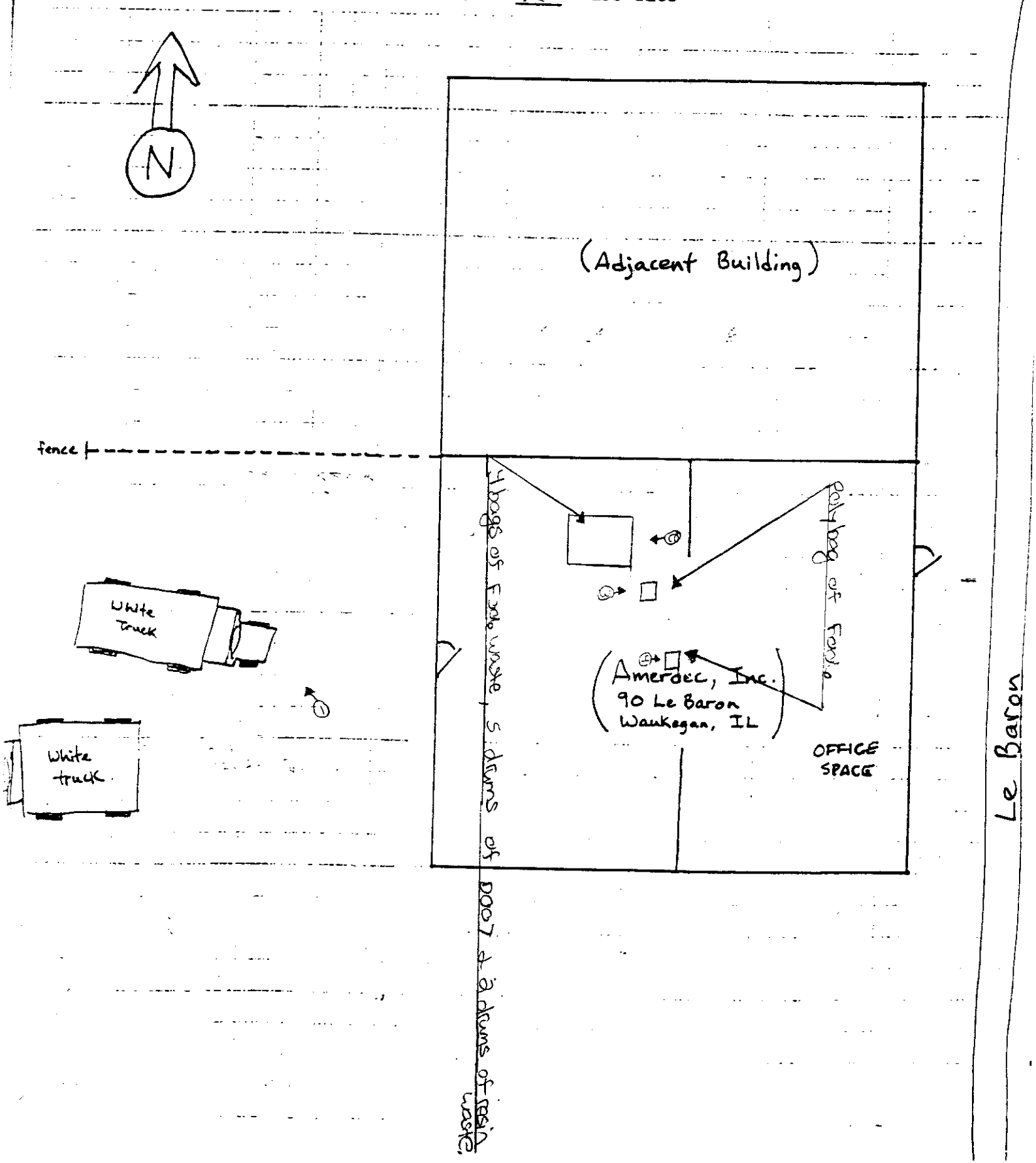
* All "No" responses must be explained in the narrative.

Facility Name: Amerdec, Inc.

USEPA Number: Non-notifier IEPA Number: 0971900034

Sketch of Site: ___Accumulation Area(s) ___Treatment Area(s) ___Storage Area(s)

___Disposal Area(s) X Entire Site



N A R R A T I V E

3/16/89
0971900034

Amerdec Inc. sells ion exchange equipment to industries that use water in their manufacturing process. This equipment includes ion exchange filters and cartridges. The company's current activities which are mostly sales and some assembling, generate no hazardous waste or nonhazardous special waste.

This company used to be called American Demineralizer and was located in Chicago (4425 W. Montrose). When operating under this name this company did take back the spent ion exchange filters from their customers, many of whom were electroplaters. American Demineralizer regenerated the resins in the columns by first back flushing the columns to remove the heavy "dirt", and then treating the resins with acids and caustics to remove the contaminants. The regeneration process generated primarily two waste streams: 1) an index filter waste collected from the back flushing activity, and 2) the acid and caustic waste water that was discharged to the sanitary sewer. The index filter waste was placed in drums throughout the facility, including outside the building. Some time in 1985, American Demineralizer went out of business. On April 23, 1986, Amerdec, Inc. was formed. (It was and is operated by the same individuals who operated American Demineralizer.) In November of 1986, Amerdec moved to their present location (the subject of this inspection). They brought some drums (approximately seven (7) of the index filter waste with them to their new location. Since the contaminants removed from the resins in the columns collectively are a wastewater treatment sludge (F006), and these contaminants were collected on the index filters, the subject site is a hazardous waste storage facility as a consequence of receiving the index filter waste from off-site.

Hazardous Waste Units

S01 - Container Storage

1. Drums of spent resin stored in a truck parked in back of the building (see 1/29/87 RCRA inspection report).

2. Drums of F006 waste stored along the north fence in back of the building (see 1/29/89 RCRA inspection report).

3. 6 poly bags of F006 waste and 5 drums of spent chrome solution (D007 - acquired from a past electroplating customer), and 2 drums of nonregenerated resin waste (F006) stored inside the building. Manager, Thomas Allegretti claimed that these wastes were stored outdoors until approximately 2 years ago.

APPARENT VIOLATIONS

I. RCRA Violations

No new RCRA violations were observed during this inspection.

Although no hazardous wastes are currently generated, transported or accepted from off site, Amerdec is still regulated as a storage facility. The following storage violations are remaining from a 1/29/87 inspection.

703.121 - Conducting hazardous waste storage without a permit or interim status.
724.113(b) - No waste analysis plan.
724.115(a) - No inspections conducted in the storage area.
724.115(b) - No inspection schedule.
725.115(d) - No inspection records.
724.135 - Inadequate aisle space in the active area.
724.137 - No arrangements with local authorities.
724.151(a) - No contingency plan.
724.153 - No contingency plan on site or submitted to local authorities.
724.173 - No operating record.
724.175 - No annual reports submitted.
724.212(a) - No closure plan.
724.242(a) - No closure cost estimate.
724.274 - No inspections in container storage area.

The following violations cited in the 1/29/87 inspection were adequately addressed.

723.112 - Facility no longer transports hazardous waste.
723.120 - Facility no longer transports hazardous waste.
724.111 - Facility has obtained a federal ID #.
724.176 - Facility no longer accepts hazardous waste from off site.
724.131 - Containers now closed during storage.
724.273 - Containers now closed during storage.
724.271 - Waste transfered to containers in good condition.
724.114(a) - Waste is now kept inside the building.
724.114(b) - Waste is now kept inside the building.

II. CAFO Violations

1. The company is in apparent violation of condition 3 because the non resinuous waste was still on site. (It was to be removed within 45 days from the effective date of the order)

2. The company is in apparent violation of condition #4 of the order because no arrangements were made for on-site pre-treatment of the resinous waste. (A Permit application was to be submitted to IEPA 15 days after the order's effective date, the necessary equipment was to be installed within 60 days of the effective date and pre-treatment was to be completed within 15 days of IEPA's final approval).

4/5/89

Addendum
to 3/16/89 IAT

Additional Notes

On September 9, 1988 a CAFO was issued for the above violations. Condition #5 of this CAFO required Amerdec to submit a closure plan for their hazardous waste storage facility 45 days from the effective date of the agreement. A closure plan has not yet been received by either the USEPA or IEPA. The USEPA has approved an extension for submital of this plan. The company now has until April 28, 1989 to submit the closure plan.

Amerdec has hired Envirite in Harvey, Il to haul their waste to a Permitted facility. Samples have been taken, but the results have not been received yet.

It should be noted that at the time of this inspection, all hazardous waste was stored indoors. The manager claimed that the waste had been stored in its present location for approximately 2 yrs. Thus the closure plan must address the present storage area and any other past areas where storage had occured.

* The 4/28/89 extension addresses conditions 3 & 4 as well as condition 5. The USEPA recognizes the fact that the company no longer intends to pretreat the resinous waste.

Date: 3/16/89 MG

Time: 10:00 am

Photograph By:

M Glynn

County: Lake

IEPA #: 0971900034

Site Name:

Amerdec Inc

Comments: facing NW east storage areas

89-225

#1

Date: 3/16/89 MG

Time: 10:00 am

Photograph By:

M. Glynn

County: Lake

IEPA #: 0971900034

Site Name:

Amerdec Inc.

Comments: facing W 4 plybags (Food), drums of spent chrome & resin.

89-225

#2

Date: 3/16/89 MG

Time: 10:00 am

Photograph By:

M Glynn

County: Lake

IEPA #: 0971900034

Site Name:

Amerdec Inc

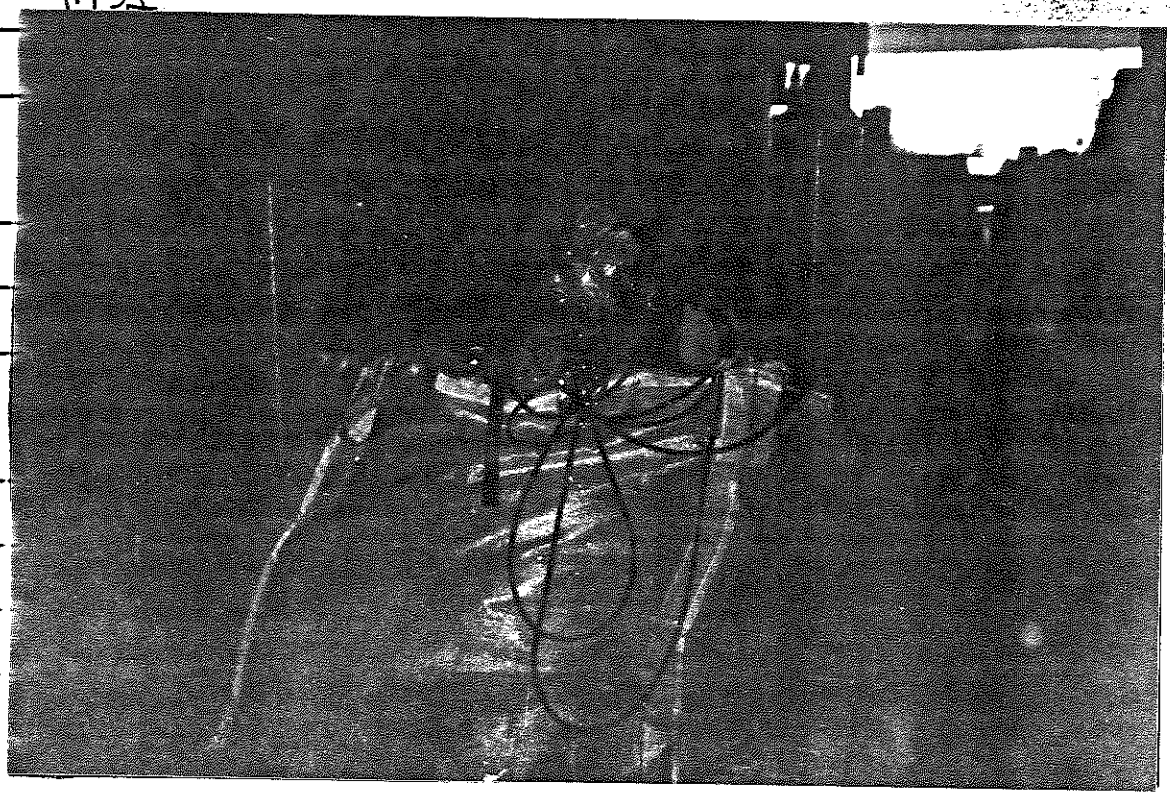
Comments: facing E

Poly bag of

Food waste

89-225

#3



Date: 3/16/89 MG

Time: 10:00 am

Photograph By:

M. Glynn

County: Lake

IEPA #: 0971900034

Site Name:

Amerdec Inc.

Comments: facing SE

@ bag of Food

waste.

89-225

#4

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
				PART 703 **RCRA PERMIT PROGRAM** **Subpart B: Prohibitions**				
OTH	1			**Section 703.121: RCRA Permits**		✓		
			a	Is any person(s) conducting any hazardous waste storage, hazardous waste treatment or hazardous waste disposal operation doing so only: 1) With a RCRA permit for the HWM facility? Yes ____ No ✓ 2) In conformance with all conditions imposed by the RCRA permit? Yes ____ No ✓ N/A ____				Site does not have a RCRA Permit or interim status.
			b	Do the owner and operator of hazardous waste management units have permits during the active life of the unit (including the closure period)? Yes ____ No ✓				
			b	Do the owners and operators of any hazardous waste unit which closed after January 26, 1982 have a permit during any post-closure period required under 35 Ill. Adm. Code 724.217 Post Closure Care and Use of Property and during any compliance period or any extension of that compliance period specified under 35 Ill. Adm. Code 724.196, Compliance Period? Yes ____ No ____ N/A ✓				No post closure

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Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
OTH	1			**PART 703** **RCRA PERMIT PROGRAM** **Subpart C: Authorization by Rule and Interim Status** **Section 703.150: Application by Existing HWM Facilities and Interim Status Qualifications**			✓	
			a	Has the owner or operator of an existing HWM facility or of a HWM facility in existence on the effective date of statutory or regulatory amendments that render the facility subject to the requirement to have a RCRA permit submitted Part A of the permit application to the Agency no later than the following times, whichever comes first: 1) Six months after the date of publication of regulations which first require the owner or operator to comply with standards in 35 Ill. Adm. Code 725? Yes ____ No ____ N/A ✓ 2) Thirty days after the date the owner or operator first becomes subject to the standards in 35 Ill. Adm. Code 725? Yes ____ No ____ N/A ✓ 3) By March 27, 1987 for generators who generate more than 100, but less than 1000 kg of waste in a calendar month and treat, store, or dispose of these wastes on-site? Yes ____ No ____ N/A ✓				Part A never submitted.

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IPC 258 8/87

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
OTH	1			**Section 703.151: Application by New HWM Facilities**			✓	
				For a new HWM facility, has the facility complied with the requirements of this section? Specifically, has the facility submitted Part A and Part B of the permit application 180 days before physical construction has commenced? Yes ____ No ____ Is the facility only operating with a RCRA permit? Yes ____ No ____ **NOTE: This violation should be cited in the CIL only after receiving approval from headquarters.**				Site does not have interim status or a Permit. Part A - never submitted Permit application - never submitted
OTH	1			**Section 703.152: Amended Part A Application**			✓	Part A never submitted
				Has the owner or operator of a HWM facility with interim status filed an amended Part A permit application with the Agency: 1) No later than the effective date of revised regulations under 35 Ill. Adm. Code 721, Identification and Listing of Hazardous Waste, listing or identifying additional hazardous waste which the HWM facility is handling? Yes ____ No ____ N/A ____ 2) As necessary to comply with the provisions of Section 703.155, Changes During Interim Status? Yes ____ No ____ N/A ____ **NOTE: The owner or operator of a facility who fails to comply with the updating requirements of this section does not receive interim status as to the wastes not covered by duly filed Part A applications.**				↓

IL 532-1502

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
OTH	1			**Section 703.154: Prohibitions During Interim Status**			✓	no interim status
				During interim status, has the facility refrained from:				
			a	- Treating, storing or disposing of hazardous waste not specified in Part A of the permit application? Yes ____ No ____				
			b	- Employing processes not specified in Part A of the permit application? Yes ____ No ____				
			c	- Exceeding the design capacities specified in Part A of the permit application? Yes ____ No ____				
OTH	1			**Section 703.155: Changes During Interim Status**			✓	
				NOTE: Section 703.155(a), (b) and (c) reiterate in more detail the requirement that a HWM facility submit and, in the case of (b) and (c) that the Agency approve, amendments to the Part A permit application prior to the facility conducting the activity or receiving new hazardous waste. A "No" answer to any of the questions under Section 703.154 means the facility is also in apparent non-compliance with this section.				
			d	Did the owner or operator submit a revised Part A permit application not later than 90 days prior to changes in operational control or ownership of the HWM facility? Yes ____ No ____ N/A ____				

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Area	Class	Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
OTH	1			**PART 725** **INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES** **Subpart A: General Provisions** **Section 725.101: Purpose, Scope and Applicability**			✓	
				Does the facility qualify for any of the exemptions under Section 725.101(c)? Yes ____ No ✓ **NOTE: If "Yes", explain in narrative.**				not exempt
			d	Has the firm managed hazardous waste with the following hazardous waste numbers: F020, F021, F022, F023, F026 or F027 in compliance with the requirements of 725.101(d)? Yes ____ No ✓				not handled

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Area	Class	O ay F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
				PART 725 **INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES** **Subpart B: General Facility Standards**				
OTH	1			**Section 725.111: USEPA Identification Number**	✓			
				Has the facility obtained a USEPA identification number?				
OTH	1			**Section 725.112: Required Notices**			✓	
			a	Has the owner or operator of a facility that has arranged to receive hazardous waste from a foreign source notified the Regional Administrator, in writing, at least four weeks in advance of the date that the waste is expected to arrive at the facility? Yes ____ No ____ N/A ✓				No waste received from foreign sources
			b	Before transferring ownership or operation of a facility during its operating life, or of a disposal facility during the post-closure care period, did the owner or operator notify the new owner or operator, in writing, of the requirements of 35 Ill. Adm. Code 703, 703 and 725? Yes ____ No ____ N/A ✓				no transfers
OTH	1			**Section 725.113: General Waste Analysis**		✓		
			a1	Has the owner or operator of the facility obtained a detailed chemical analysis of each waste prior to its treatment, storage or disposal? Yes ✓ No ____				Envirite took samples in Jan, 1989

Area	Class	Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Com... No.
			a1	Does the analysis contain all the information which must be known to treat, store or dispose of the waste in accordance with this Part? Yes ✓ No ____				
			a3	Has the analysis been repeated:				
				A) When the operator is notified or has reason to believe that the process generating the hazardous waste has changed? Yes ____ No ____ N/A ✓				waste no longer generated.
				B) By off-site facilities, when the results of the inspection required in Section 725.113(a)(4) indicate that the hazardous waste received at the facility does not match the waste designated on the accompanying manifest or shipping paper? Yes ____ No ____ N/A ✓				waste no longer accepted from off-site.
			a4	Has the owner or operator of an off-site facility apparently inspected each hazardous waste movement received at the facility to determine whether it matches the identity of the waste specified on the accompanying manifest or shipping paper? Yes ____ No ____ N/A ____				
			b	Has the owner or operator developed a written analysis plan? Yes ____ No ✓ **NOTE: If "No", skip to 725.114.** Is the written waste analysis plan available at the facility? Yes ____ No ____				no waste analysis plan

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Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
				6) The methods which will be used to meet the additional analysis requirements for specific waste management methods as specified in Sections: - 725.293 (Tanks); - 725.325 (Surface Impoundments); - 725.352 (Waste Piles); - 725.373 (Land Treatment); - 725.414 (Incinerators); - 725.475 (Thermal Treatment); - 725.502 (Chem. Phys. Bio. Treat.) Yes ____ No ____ N/A ____				
				NOTE: Circle the specific waste management methods being employed.				
			c	For off-site facilities, does the plan:				
				1) Describe the procedures which will be used to determine the identity of each movement of waste managed at the facility? Yes ____ No ____ N/A ____				
				2) Describe the sampling methods which will be used to obtain a representative sample of the waste to be identified, if the identification method includes sampling? Yes ____ No ____ N/A ____				
OTH	1	X		**Section 725.114: Security**		✓		
				Does the facility qualify for the exemption to the requirement to provide security provided in Section 725.114(a)? Yes ____ No ✓				not exempt

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Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
				Does a non-exempt facility have either:				no security or surveillance
			b	1) A 24-hour surveillance system which continuously monitors and controls entry into the active portion of the facility? Yes ____ No X				
				OR				
			b	2) An artificial or natural barrier which completely surrounds the active portion of the facility and a means to control entry at all times thru the gate(s) or other entries to the active portion of the facility? Yes X No ____				wastes are inside the building.
			c	Does a non-exempt facility have a sign, legible from a distance of at least 25 feet, with the words "Danger - Unauthorized Personnel Keep Out" at each entrance to the active portion of the facility and at other locations in sufficient numbers to be seen from any approach to the active portion? Yes ____ No X **NOTE: Existing signs with legends other than the one above may be used if the legend on the sign indicates only authorized personnel are allowed to enter the active portion and that entry onto the active portion can be dangerous.**				no sign is posted.

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Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
OTH	2			**Section 725.115: General Inspection Requirements**		✓		
			a	Does the owner or operator inspect the facility for malfunctions, deterioration, operator errors and discharges which are causing or may lead to: 1) Release of hazardous waste or hazardous waste constituents to the environment; or a threat to human health? Yes ____ No ✓				No inspections are conducted.
			a	Does the owner or operator conduct these inspections often enough to identify problems in time to correct them before they harm human health or the environment? Yes ____ No ✓				
			b1	Has the owner or operator developed a written schedule for inspecting all monitoring equipment, safety and emergency equipment, security devices and operating and structural equipment important to preventing, detecting or responding to environmental or human health hazards? Yes ____ No ✓				no inspection scedule.
			b2	Is the written schedule at the facility? Yes ____ No ✓				
			b3	Does the schedule identify the types of problems which are to be looked for during the inspection? Yes ____ No ✓				
			b4	Does the schedule specify at least the following minimum inspection frequency: - Daily inspections of areas subject to spills? Yes ____ No ✓				

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

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Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
				- A notation of the observations made? Yes ____ No ____				
				- The date and nature of any type of corrective action? Yes ____ No ____ N/A ____				
OTH	2			**Section 725.116: Personnel Training**			✓	Manager, Tom Allegretti is the only party who handles the waste. On the job experience has served as adequate training for him
				Does the facility have a training program? Yes ____ No ____				
				NOTE: If "No", skip to Section 725.117, Page TSD-B-10.				
			a1	Have facility personnel who are involved with hazardous waste management successfully completed a program of classroom or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the requirements of this Part? Yes ____ No ____				
				Is the training program formalized, i.e., written down? Yes ____ No ____				
			a2	Is the program directed by a person who has been trained in hazardous waste management procedures? Yes ____ No ____				
			a3	Does the program cover, at a minimum:				
				A) Procedures for using, inspecting, repairing and replacing facility emergency and monitoring equipment? Yes ____ No ____ N/A ____				

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Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
				2) A written job description for each job position above, to include the requisite skill, education or other qualifications and duties of personnel assigned to each position? Yes ____ No ____				
				3) A written description of the type and amount of both initial and continuing training that will be given to each person holding a position dealing with hazardous waste management? Yes ____ No ____				
				4) Records to document that the training or job experience have been given to and completed by personnel dealing with hazardous waste management? Yes ____ No ____				
			e	Is the facility maintaining training records of former employees who were involved in hazardous waste management for a period of at least three years? Yes ____ No ____ N/A ____				
OTH	1	X		**Section 725.117: General Requirements for Ignitable, Reactive or Incompatible Wastes**			✓	No ignitable or reactive waste
			a	Are ignitable and reactive wastes protected from and separated from sources of ignition and reaction? Yes ____ No ____				
			a	Are smoking and open flames restricted to specially designated areas when ignitable or reactive waste is being handled? Yes ____ No ____				

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Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
				Section 725.118: Location Standards Has the facility placed hazardous waste in a salt dome, salt bed formation, underground mine or cave after July 11, 1986? Yes ____ No ✓ N/A ____ **NOTE: A "Yes" answer is a violation of the location standard.**			✓	container storage only.

IL 532-1502
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Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
				PART 725 **INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES** **Subpart C: Preparedness and Prevention**				
OTH	1	X		**Section 725.131: Maintenance and Operation of Facility**	✓			
				Is the facility being maintained and operated to minimize the possibility of a fire, explosion or any unplanned and sudden or non-sudden release of hazardous waste or hazardous waste constituents to: - Air; - Soil; or - Surface water, which would threaten human health or the environment? Yes ✓ No ____				
OTH	1	X		**Section 725.132: Required Equipment**	✓			
				Is the facility equipped with the following, unless none of the hazards posed by waste handled at the facility could require a particular kind of equipment:				Because of the types and amounts of waste, on site. i.e small amount of (F006, D007)
			a	- An internal communications or alarm system capable of providing immediate emergency instructions? Yes ____ No ____ N/A ✓				
			b	- A device such as a telephone (immediately available at the scene of operations) capable of summoning emergency assistance from local police or fire departments or State or local emergency response teams? Yes ____ No ____ N/A ✓				immediate emergency action would not be required.

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Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No
			c	- Portable fire extinguishers, fire control equipment, spill control equipment and decontamination equipment? Yes ✓ No ____ N/A ____				
			d	- Water at adequate volume and pressure to supply water hose streams or foam producing equipment or automatic sprinklers or water spray systems? Yes ____ No ____ N/A ✓ **NOTE: Any "N/A" answers must be explained in the Remarks column.**				
OTH	1	X		**Section 725.133: Testing and Maintenance of Equipment** Where required, is the facility testing and maintaining, as necessary, to assure proper operation in time of emergency: - Communications/alarm systems? Yes ____ No ____ N/A ✓ - Fire protection equipment? Yes ✓ No ____ N/A ____ - Spill control equipment? Yes ✓ No ____ N/A ____ - Decontamination equipment? Yes ✓ No ____ N/A ____ **NOTE: Any "N/A" answer must be explained in the Comments.**				yearly inventoried as used.

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

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Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
				PART 725 **INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES** **Subpart D: Contingency Plan and Emergency Procedures**				
OTH	1			**Section 725.151: Purpose and Implementation of Contingency Plan**		✓		NO contingency Plan
			a	Is a plan available? Yes ____ No ✓				
				NOTE: If the answer is "No", skip to 725.155.				
			a	Is the plan designed to minimize hazards to human health or the environment from fires, explosions or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface waters? Yes ____ No ____				
			b	Have the provisions of the plan been carried out immediately whenever there was a fire, explosion or release of hazardous waste constituents which could threaten human health or the environment? Yes ____ No ____ N/A ____				
OTH	2			**Section 725.152: Content of Contingency Plan**				
			a	Does the plan describe the actions facility personnel must take to comply with Sections 725.151 and 725.156 in response to: 1) Fires? Yes ____ No ____ 2) Explosions? Yes ____ No ____				

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Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
				2) A brief outline of the capability of each piece of emergency equipment? Yes ____ No ____				
				3) The location of each piece of emergency equipment? Yes ____ No ____				
			e	Is the list of emergency equipment up-to-date? Yes ____ No ____				
			f	Does the plan include an evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? Yes ____ No ____ N/A ____				
			f	Does the plan identify the signal to be used to begin evacuation? Yes ____ No ____				
			f	Are alternate evacuation routes identified? Yes ____ No ____				
OTH	2			**Section 725.153: Copies of Contingency Plan**			✓	
			a	Has a copy (and all revisions) of the contingency plan:				
				a) Been maintained at the facility? Yes ____ No ____				
			b	b) Been submitted to all local police and fire departments, hospitals, and State and local emergency response teams that may be called upon to provide emergency service? Yes ____ No ____				

IL 532-1592
LPC 258 8/87

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
OTH	2			**725.154: Amendment of Contingency Plan**				
				Has the contingency plan been reviewed and, if necessary, amended whenever:				
			a	1) Applicable regulations are revised? Yes ____ No ____				
			b	2) The plan fails in an emergency? Yes ____ No ____ N/A ____				
			c	3) The facility changes - in its design, construction, operation, maintenance or other circumstances - in a way that materially increases the potential for fires, explosions, or releases of hazardous waste or hazardous waste constituents or changes the response necessary in an emergency? Yes ____ No ____ N/A ____				
			d	4) The list of emergency coordinators changes? Yes ____ No ____				
			e	5) The list of emergency equipment changes? Yes ____ No ____				
OTH	2			**Section 725.155: Emergency Coordinator**	✓			Tom & Maggie Allegretti are qualified to act as Emergency coordinators. There are no other people employed by Amerdec
				Is there an emergency coordinator on-site or on-call at all times? Yes ✓ No ____				

IL 532-1592
LPC 256 8/87

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
				Is there an emergency coordinator familiar with all aspects of the contingency plan, all operations and activities at the facility, the location and characteristics of the wastes handled, the location of all records in the facility and the facility layout? Yes ✓ No ____				
				Does the coordinator have the authority to commit the resources to carry out the contingency plan? Yes ✓ No ____				
OTH	1/2			**Section 725.156: Emergency Procedures**			✓	
				Has the facility had a release, fire or explosion? Yes ____ No ✓				NO fires, releases or explosions.
				NOTE: If the answer is "Yes", explain in detail the incident and how the facility did or did not follow the procedures described in this section. Review the requirements while completing the explanation. If the company failed to meet one or more of the requirements, check "No" in the Apparent Compliance column.				

IL 532-1502
LPC 256 8/87

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
MAN	1			**PART 725** **INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES** **Subpart E: Manifest System, Recordkeeping and Reporting** **Section 725.171: Use of Manifest System**			✓	
				Does the facility accept waste from off-site? Yes ____ No ✓ *				* currently no waste is accepted from off-site but in 1986 they transported waste from their old location in Chicago to their present location. (no manifests were used.)
				NOTE: If the answer is "Yes", complete this section. If the answer is "No", check "N/A" and skip to 725.173.				
				For each manifest reviewed, did the facility:				
			a1	1) Sign and date each copy to certify that the hazardous waste covered by the manifest was received? Yes ____ No ____				
			a2	2) Note any significant discrepancies in the manifest or each copy of the manifest? Yes ____ No ____ N/A ____				
			a3	3) Immediately give one copy of the completed manifest to the transporter? Yes ____ No ____				
			a4	4) Within 30 days after delivery, send one copy of the manifest to the generator and one copy to the Agency? Yes ____ No ____				
			a5	5) Retain a copy of the manifest at the facility for a period of three years from the date of delivery of the waste? Yes ____ No ____				

IL 532-1502
LPC 258 8/87

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
			b	Has the facility followed the procedures prescribed in 725.171(b) for rail or water (bulk shipments) of hazardous waste? Yes ____ No ____ N/A ____ Does the facility initiate shipments of hazardous waste? Yes ____ No ____ **NOTE: If the answer is "Yes", the facility is also a generator of hazardous waste. Complete the generator checklist.**				
MAN	2			**Section 725.172: Manifest Discrepancies**			✓	
				NOTE: If there are no manifest discrepancies, mark the "N/A" column.				
			b	Has the owner or operator attempted to resolve significant discrepancies in quantity or type (i.e., variations in weight of 10% or more, variations in piece count of one container per truckload, obvious differences which can be discovered by inspection or waste analysis such as waste solvent substituted for waste acid) upon their discovery? Yes ____ No ____				
			d	If the discrepancy is not resolved within 15 days after receiving the waste, has the owner or operator submitted to the Agency a letter describing the discrepancy and the attempts made to reconcile it and a copy of the manifest or shipping paper at issue? Yes ____ No ____				

IL 532-1502
LPC 250 8/87

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
OTH	2			**Section 725.173: Operating Record**		✓		
			a	Does the owner or operator have a written operating record at the facility? Yes ____ No ✓				no written operating record.
			b	Is the information in the operating record being maintained until closure of the facility? Yes ____ No ____				
			b	Does the operating record contain the following information: 1) A description of and quantity of each hazardous waste received at the TSD facility (whether from on or off-site generation)? Yes ____ No ____ 2) A record of the method(s) and date(s) of its treatment, storage, or disposal as required by Appendix I? Yes ____ No ____ 3) The location of each hazardous waste within the facility? Yes ____ No ____ 4) The quantity of each hazardous waste at each location within the facility? Yes ____ No ____ 5) For disposal facilities, a map recording the location and quantity of hazardous waste in each cell or disposal area? Yes ____ No ____ N/A ____				

IL 532-1592
LPC 258 8/87

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
				11) All closure cost estimates required by Section 725.242? Yes ____ No ____ N/A ____				
				12) All post-closure cost estimates for disposal facilities required for Section 725.244? Yes ____ No ____ N/A ____				
OTH	2			**Section 725.174: Availability, Retention and Disposition of Records**			1	NO existing records.
			a	During the inspection, were all records including plans required under this Part furnished upon request and made available at all reasonable times for inspection as required by this Section? Yes ____ No ____ N/A ____				
			c	Upon closure of a waste disposal facility did the owner or operator submit a copy of the record of waste disposal location(s) and quantities to: - The Agency? Yes ____ No ____ - The local land authority? Yes ____ No ____ N/A ____				
			b	Are all required records being maintained and retained during the course of any unresolved enforcement action or as requested by the Director? Yes ____ No ____ N/A ____				

IL 532-1592
LPC 258 8/87

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
OTH	2			**Section 725.175: Annual Report**		X		No annual reports were submitted.
				Has the owner or operator prepared and submitted a copy of a facility annual report, supplied by the Agency, to the Agency by March 1 of each year for the preceding calendar year?				
OTH	1			**Section 725.176: Unmanifested Waste Report**			✓	*
				Does the facility accept hazardous waste from off-site? Yes ____ No ✓ *				
				NOTE: If the answer is "Yes", complete this section. If the answer is "No", check "N/A" and skip to 725.177.				
				Has the facility accepted hazardous waste from an off-site source for treatment, storage or disposal without an accompanying manifest or shipping paper? Yes ____ No ____				
				Was the hazardous waste accepted without the manifest or shipping paper exempt from the manifesting requirement by 35 Ill. Adm. Code 721.105? Yes ____ No ____				
				NOTE: If the answer to both the above questions is "Yes", check "N/A". If the answer to the first question is "Yes" and the second "No", answer the following questions:				
				Did the owner or operator complete an unmanifested waste report to include the information required in Section 725.176(a) thru (g)? Yes ____ No ____				

IL 532-1502
LPC 256 8/87

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
				Did the owner or operator submit the unmanifested waste report to the Agency within 15 days of receiving the waste? Yes ____ No ____				
OTH	2			**Section 725.177: Additional Reports**			✓	
				Has the owner or operator submitted to the Agency, as required, reports concerning:				
			a	1) Releases, fires, explosions as specified in Section 725.156? Yes ____ No ____ N/A ✓				No releases, fires or explosions
			b	2) Groundwater contamination and monitoring data as specified in Sections 725.193 and 725.194? Yes ____ No ____ N/A ✓				No groundwater contamination
			c	3) Facility closure as specified in Section 725.215? Yes ____ No ____ N/A ✓				Facility has not yet initiated closure activities.

IL 532-1502
LPC 256 6/87

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
				PART 725 **INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES** **Subparts G and H: Closure, Post-Closure and Financial Requirements**				
CLO	1			**Section 725.212: Closure Plan**		✓		no facility closure plan to date.
			a	Was the most current facility closure plan available during the inspection? Yes ____ No ✓				
				Was the closure plan submitted to the Agency within the time frames specified below: - At least 180 days prior to the date closure of the first surface impoundment, waste pile, land treatment or landfill unit was (is) expected to begin? Yes ____ No ____ N/A ____ - At least 180 days prior to the date of final closure of a facility with surface impoundment(s), waste pile(s), land treatment or landfill unit(s)? Yes ____ No ____ N/A ____ - At least 45 days prior to the date of final closure of a facility with any tank(s), container storage or incinerator unit(s)? Yes ____ No ____ N/A ____ - At least 60 days prior to the date closure is expected to begin at a facility with a surface impoundment, waste pile, landfill or land treatment unit which also has an approved closure plan? Yes ____ No ____ N/A ____				

IL 532-1502
LPC: 256 6/87

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
				- No later than 15 days after termination of interim status (unless a full operating permit was issued simultaneously)? Yes ____ No ____ N/A ____				
				- No later than 15 days after issuance of a judicial decree or Board Order to cease receiving hazardous waste or close? Yes ____ No ____ N/A ____				
CLO	1			**Section 725.218: Post-Closure Plan**			✓	no land disposal
			a	Was the most current facility post-closure plan available during the inspection? Yes ____ No ____				
				Was the post-closure plan submitted to the Agency within the time frames established in this sub-section? Yes ____ No ____ N/A ____				
FIN	1			**Section 725.242: Cost Estimate for Closure**				
				Has the facility prepared a written estimate of the cost of closing the facility?				
FIN	1			**Section 725.244: Cost Estimate for Post-Closure Care**				
				Has the facility prepared a written estimate of the annual cost of post-closure monitoring and maintenance of the facility?				
				NOTE: If no post-closure plan, mark "N/A".				

IL 532-1502
LPC 256 8/87

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
				PART 725 **INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES** **Subpart I: Use and Management of Container**				
OTH	1	X		**Section 725.271: Condition of Containers**	✓			
				Has the owner or operator transferred the hazardous waste in leaking container or containers which are not in good condition or managing the waste in some other way that complies with the requirements of this Part?				waste transferred into poly bags.
OTH	1	X		**Section 725.272: Compatibility of Waste with Containers**	✓			
				Is the owner or operator using containers made of or lined with materials which will not react with and are otherwise compatible with the hazardous waste to be stored so that the ability of the container to contain the waste is not impaired?				
OTH	1	X		**Section 725.273: Management of Containers**	✓			
			a	Are containers of hazardous waste always closed during storage? Yes ✓ No ___				
			b	Are containers of hazardous waste being opened, handled or stored in manner which will prevent the rupture of the container or prevent it from leaking? Yes ✓ No ___				
OTH	2			**Section 725.274: Inspections**		✓		
				Is the owner or operator inspecting areas where the containers are stored at least weekly, looking for leaks and for deterioration caused by corrosion or other factors? Yes ___ No ✓				No inspections conducted.

IL 532-1592
LPC 250 8/87

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
				NOTE: Any evidence of leakage may be a reason to answer "No" to the above question, even if there are inspection records that indicate that inspections are being done. Review the responses in Section 725.115, General Inspection Requirements, the frequency of inspections, the date of the last inspection, etc. to determine if inspections are actually being done.				
OTH	1	X		**Section 725.276: Special Requirements for Ignitable or Reactive Wastes** Are containers holding ignitable or reactive waste located at least 50 feet from the property line?			✓	No ignitable or reactive waste
OTH	1	X		**Section 725.277: Special Requirements for Incompatible Wastes** Is the owner complying with the requirements concerning the management of incompatible wastes or incompatible wastes and materials contained in this Section?			✓	no incompatible waste.

IL 532-1502
LPC 250 8/87

RCRA LAND DISPOSAL RESTRICTION INSPECTION

Facility: Amerdec Inc.

U.S. EPA I.D. No.: ILD 061401476 (0971900034)

Street: 90 Le Baron

City: Waukegan State: Illinois Zip Code: 60085

Telephone: (312) 623-6650

Operator: Same

Street:

City: State: Zip Code:

Telephone:

Owner: John Keepper

Street: 465 Evanston

City: Lake Bluff State: Illinois Zip Code: 60044

Telephone: (312) 706-4940

Inspection Date: 3/16/89 Time: 9:30 am - 11:00 am Weather Conditions: 40°F, Sunny

	Name	Affiliation	Telephone
Inspectors:	Mary Glynn	IEPA	(312)345-9780

Facility Representatives: Tom Allegretti - Manager

	RCRA Status	LDR Status F-Solvent	LDR Status California List	First Third
Generator				
Transporter				
Treater				
Storer				X F006
Disposer				

Revised 11-03-87

RCRA LAND DISPOSAL RESTRICTION INSPECTION

APPLICABILITY CHECKLIST

Does the facility handle the following wastes?

Not handled

	Gen.	Treat	Store	Disp.	Trans.
* A. F-Solvent Wastes					
1. F001	____	____	____	____	____
2. F002	____	____	____	____	____
3. F003	____	____	____	____	____
4. F004	____	____	____	____	____
5. F005	____	____	____	____	____

Note: Use Appendix A to determine whether the facility is misclassifying any of its wastes.

B. California List Wastes

1. Liquid hazardous waste (including free liquids associated with any solid or sludge) that contains the following metals at concentrations greater than or equal to those specified

		Gen.	Treat	Store	Disp.	Trans.
Arsenic	500 mg/L	____	____	____	____	____
Cadmium	100 mg/L	____	____	____	____	____
Chromium VI	500 mg/L	____	____	____	____	____
Lead	500 mg/L	____	____	____	____	____
Mercury	20 mg/L	____	____	____	____	____
Nickel	134 mg/L	____	____	____	____	____
Selenium	100 mg/L	____	____	____	____	____
Thallium	130 mg/L	____	____	____	____	____

C. <u>First Third Wastes</u>

Note: (1) The detailed description for waste codes are listed in Appendix C.
(2) EPA has promulgated the treatment standards for the following waste code with *.

	Gen.	Treat	Store	Disp.	Trans.
F006*			X		
F007					
F008					
F009					
F019					
K001*					
K004*					
K008*					
K011					
K013					
K014					
K015*					
K016*					
K017					
K018*					
K019*					
K020*					
K021*					
K022*					
K024*					
K025*					
K030*					
K031					
K035					
K036*					
K037*					
K044*					
K045*					
K046*					

INSPECTION SUMMARY

For the past 2 years Amandec has stored 555 gal of F006 (soft hammer) wastes + 275 gal of D007 waste.

There have been no off-site shipments. All of the waste was sampled in January 1989 but results have not been received yet. Thus the concentration of chromium in the D007 waste is still unknown. At this time, it cannot be identified as a [redacted] California list waste.

The company never intended to be a storage facility. They have none of the required paperwork & they intend to go through closure.

Because it has not yet been determined that the D007 waste is a California List waste and because the effective date for First Third (F006) waste is May 8, 1990, NO LDR violations were cited

See Narrative for 3/16/89 RCRA inspection for further information

Wastes shipped to:

TSD NAME LOCATION EPA ID NO.	TYPE OF FACILITY T/D METHODS	WASTE CODE	WASTE QUANTITY	COMMENTS (shipment dates, waste descriptions, etc.)

RCRA LAND DISPOSAL RESTRICTION INSPECTION

TSD CHECKLIST

TSD REQUIREMENTS

A. General Facility Standards

1. Does the waste analysis plan cover Part 268 requirements [264.13 or 265.13]?

   o F-solvent ____ Yes ____ No ____ NA

   o California List ____ Yes ____ No ____ NA

   o First Third ____ Yes ____ No ✓ NA NO waste analysis Plan

2. Does the facility obtain representative chemical and physical analyses of wastes and residues?

   ✓ Yes ____ No Envirite (Harvey, Il) Sampled in Jan, 1989

   a. What date was the waste analysis plan last revised? No written plan

   b. Are analyses conducted on-site or off-site?

   ____ On-site ✓ Off-site

   Identify off-site lab: Envirite in Harvey, Il

   c. Is F-solvent waste analyzed using TCLP? NO F solvent waste

   ____ Yes ____ No ✓ NA

   d. Is First Third waste analyzed using the analytical method that is appropriate for the objective of the specified BDAT (i.e., total constituent analysis for destruction technologies and TCLP for stabilization/fixation technologies)?

   ✓ Yes ____ No ____ NA

   Note: The appropriate analytical methods (TCLP or total constituent) for first third wastes with specified treatment standards are given in Appendix D.

   e. Describe the frequency of sampling: Waste sampled one time only Jan, 1989

3. Are the operating records, including analyses and quantities, complete [264.73/265.73]?

____ Yes ____ No ✓ NA no operating record

B. <u>Storage</u> (268.50)

1. Are restricted wastes stored on-site?

✓ Yes ____ No

If no, go to C, Treatment.

2. If yes, check the appropriate method.

____ Tanks
✓ Containers

3. Are all containers clearly marked to identify the contents and date(s) entering storage?

____ Yes ✓ No ____ NA

Containers are labeled but not dated

4. Do operating records track the location, quantity of the wastes, and dates that the wastes enter and leave storage?

____ Yes ____ No ✓ NA no operating record

5. Do operating records agree with container labeling?

____ Yes ____ No ✓ NA

6. Do operating records contain copies of the notice, certification, and demonstration (if applicable) from the generator for the past 5 years?

____ Yes ____ No ✓ NA

7. Have wastes been stored for more than 1 year since the applicable LDR regulations went into effect?

soft hammer first third waste.

____ Yes ✓ No ____ NA

If yes, can the facility show that such accumulation is necessary to facilitate proper recovery, treatment, or disposal?

effective date May 5, 1990

____ Yes ____ No

If yes, state how: _____

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

____ Yes ____ No ✓ NA

No Tanks

If yes, do the operating records show that the volume of waste removed from tanks annually equals or is more than the tank volume?

____ Yes ____ No

9. Are all tanks clearly marked with a description of the contents, the quantity of wastes received, and date(s) entering storage, or is such information recorded and maintained in the operating record?

____ Yes ____ No ____ NA

C. <u>Treatment</u>

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

No Treatment

____ Yes ____ No

If no, go to D, Treatment in Surface Impoundments.

8. Does the facility ship any "soft hammer" waste to an off-site disposal facility?

_____ Yes _____ No _____ NA

If yes, does the treatment facility send a copy of the generator's demonstration (if applicable) and certification to the disposal facility?

_____ Yes _____ No

D. <u>Treatment in Surface Impoundments</u>

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

_____ Yes _____ No

If no, go to E, Land Disposal.

2. If yes, did the facility submit to the Agency the waste analysis plan and certification of compliance with minimum technology and ground-water monitoring requirements?

_____ Yes _____ No

3. If the minimum technology requirements have not been met, has a waiver been granted for that unit?

_____ Yes _____ No _____ NA

4. Are representative samples of the sludge and supernatant from the surface impoundment tested separately, acceptably, and in accordance with the sampling frequency and analysis specified in the waste analysis plan?

_____ Yes _____ No

Attach test results.

5. Do the hazardous waste residues (sludges or liquids) exceed the treatment standards specified in 268.41, or where no treatment standards are established for a waste, the applicable prohibition levels?

_____ Yes _____ No

E. **Land Disposal**

1. Are restricted wastes placed in land disposal units such as landfills, surface impoundments, waste piles, wells, land treatment units, salt domes/beds, mines/caves, or concrete vault or bunker?

   ____ Yes ____ No

   Note: Do not include surface impoundments addressed in D, Treatment in Surface Impoundments.

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

2. Are these wastes disposed of in a new, replacement, or laterally expanded landfill or impoundment that meets the minimum technology requirements (double liner and leachate collection) and groundwater monitoring?

   ____ Yes ____ No

3. Does the facility operating record have notices, certifications, and demonstration (if applicable) from generators/storer/treaters for 5 years [268.7(c); 268.7(a),(b)]?

   ____ Yes ____ No

4. Does the facility obtain waste analysis data or test the wastes (according to the waste analysis plan) to determine that the wastes comply with the applicable treatment standards [268.7(c)]?

   ____ Yes ____ No

   If yes, at what frequency? _____

5. If restricted wastes that exceed the treatment standards are placed in land disposal units (excluding national capacity variances) [268.30(a)], does facility have an approved waiver based on no migration petition [268.6], an approved case-by-case capacity extension [268.5], or variance [268.44]?

   ____ Yes ____ No

6. Does the facility dispose of restricted wastes that are subject to a national capacity variance?

   ____ Yes ____ No

all inspection out
- F006 (WWW) had a treatment standard established 8-8-88
- F006 (WW) is a hot Hammer waste
- not a variance until 5-8-88 as stated (p.21)

RCRA LAND DISPOSAL RESTRICTION INSPECTION

Facility: Amerdec Inc.

U.S. EPA I.D. No.: ILD161401476 (0971900034)

Street: 90 Le Baron

City: Waukegan State: Illinois Zip Code: 60085

Telephone: (312) 623-6650

Operator: Same

Street:

City: State: Zip Code:

Telephone:

Owner: John Keepper

Street: 465 Evanston

City: Lake Bluff State: Illinois Zip Code: 60044

Telephone: (312) 706-4940

Inspection Date: 3/16/89 Time: 9:30 am - 11:00 am Weather Conditions: 40°F, Sunny

	Name	Affiliation	Telephone
Inspectors:	Mary Glynn	IEPA	(312)345-9780

Facility Representatives: Tom Allegretti - Manager

	RCRA Status	LDR Status F-Solvent	LDR Status California List	First Third
Generator				
Transporter				
Treater				
Storer				X F006
Disposer				

RECEIVED
APR 24 1989
IEPA-DLPC

Revised 11-03-87

rec'd 5-4-89 WMD

INSPECTION SUMMARY

For the past 2 years Amandec has stored 555 gal of F006 (soft hammer) wastes & 275 gal of D007 waste.

There have been no off-site shipments. All of the waste was sampled in January 1989 but results have not been received yet. Thus the contentration of chromium in the D007 waste is still unknown. At this time, it cannot be identified as a [redacted] California list waste.

The company never intended to be a storage facility. They have none of the required paperwork & they intend to go through closure.

Because it has not yet been determined that the D007 waste is a California List waste and because the effective date for First Third (F006) [redacted] waste is May 8, 1990, NO LDR violations were cited

See Narative for 3/16/89 RCRA inspection for further information

RCRA LAND DISPOSAL RESTRICTION INSPECTION

APPLICABILITY CHECKLIST

Does the facility handle the following wastes?

Not handled

	Gen.	Treat	Store	Disp.	Trans.
* A. **F-Solvent Wastes**					
1. F001	____	____	____	____	____
2. F002	____	____	____	____	____
3. F003	____	____	____	____	____
4. F004	____	____	____	____	____
5. F005	____	____	____	____	____

Note: Use Appendix A to determine whether the facility is misclassifying any of its wastes.

B. **California List Wastes**

1. Liquid hazardous waste (including free liquids associated with any solid or sludge) that contains the following metals at concentrations greater than or equal to those specified

		Gen.	Treat	Store	Disp.	Trans.
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Cadmium	100 mg/L	____	____	____	____	____
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Lead	500 mg/L	____	____	____	____	____
Mercury	20 mg/L	____	____	____	____	____
Nickel	134 mg/L	____	____	____	____	____
Selenium	100 mg/L	____	____	____	____	____
Thallium	130 mg/L	____	____	____	____	____

C. **First Third Wastes**

Note: (1) The detailed description for waste codes are listed in Appendix C.
(2) EPA has promulgated the treatment standards for the following waste code with *.

	Gen.	Treat	Store	Disp.	Trans.
F006*			X		
F007					
F008					
F009					
F019					
K001*					
K004*					
K008*					
K011					
K013					
K014					
K015*					
K016*					
K017					
K018*					
K019*					
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K024*					
K025*					
K030*					
K031					
K035					
K036*					
K037*					
K044*					
K045*					
K046*					

RCRA LAND DISPOSAL RESTRICTION INSPECTION

TSD CHECKLIST

TSD REQUIREMENTS

A. <u>General Facility Standards</u>

1. Does the waste analysis plan cover Part 268 requirements [264.13 or 265.13]?

   o F-solvent ____ Yes ____ No ____ NA

   o California List ____ Yes ____ No ____ NA

   o First Third ____ Yes ____ No ✓ NA NO waste analysis Plan

2. Does the facility obtain representative chemical and physical analyses of wastes and residues?

   ✓ Yes ____ No Envirite (Harey, Il) Sampled in Jan, 1989

   a. What date was the waste analysis plan last revised? NO written Plan

   b. Are analyses conducted on-site or off-site?

   ____ On-site ✓ Off-site

   Identify off-site lab: Envirite in Harey, Il

   c. Is F-solvent waste analyzed using TCLP? NO F solvent waste

   ____ Yes ____ No ✓ NA

   d. Is First Third waste analyzed using the analytical method that is appropriate for the objective of the specified BDAT (i.e., total constituent analysis for destruction technologies and TCLP for stabilization/fixation technologies)?

   ✓ Yes ____ No ____ NA

   Note: The appropriate analytical methods (TCLP or total constituent) for first third wastes with specified treatment standards are given in Appendix D.

   e. Describe the frequency of sampling: Waste sampled one time only Jan, 1989

3. Are the operating records, including analyses and quantities, complete [264.73/265.73]?

____ Yes ____ No ✓ NA no operating record

B. <u>Storage</u> (268.50)

1. Are restricted wastes stored on-site?

✓ Yes ____ No

If no, go to C, Treatment.

2. If yes, check the appropriate method.

____ Tanks
✓ Containers

3. Are all containers clearly marked to identify the contents and date(s) entering storage?

____ Yes ✓ No ____ NA

Containers are labeled but not dated

4. Do operating records track the location, quantity of the wastes, and dates that the wastes enter and leave storage?

____ Yes ____ No ✓ NA no operating record

5. Do operating records agree with container labeling?

____ Yes ____ No ✓ NA

6. Do operating records contain copies of the notice, certification, and demonstration (if applicable) from the generator for the past 5 years?

____ Yes ____ No ✓ NA

7. Have wastes been stored for more than 1 year since the applicable LDR regulations went into effect?

soft hammer first third waste.

____ Yes ✓ No ____ NA

If yes, can the facility show that such accumulation is necessary to facilitate proper recovery, treatment, or disposal?

effective date May 8, 1990

____ Yes ____ No

If yes, state how: _____

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

____ Yes ____ No ✓ NA

NO Tanks

If yes, do the operating records show that the volume of waste removed from tanks annually equals or is more than the tank volume?

____ Yes ____ No

9. Are all tanks clearly marked with a description of the contents, the quantity of wastes received, and date(s) entering storage, or is such information recorded and maintained in the operating record?

____ Yes ____ No ____ NA

_____

C. <u>Treatment</u>

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

NO Treatment

____ Yes ____ No

If no, go to D, Treatment in Surface Impoundments.

8. Does the facility ship any "soft hammer" waste to an off-site disposal facility?

____ Yes ____ No ____ NA

If yes, does the treatment facility send a copy of the generator's demonstration (if applicable) and certification to the disposal facility?

____ Yes ____ No

D. **Treatment in Surface Impoundments**

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

____ Yes ____ No

If no, go to E, Land Disposal.

2. If yes, did the facility submit to the Agency the waste analysis plan and certification of compliance with minimum technology and ground-water monitoring requirements?

____ Yes ____ No

3. If the minimum technology requirements have not been met, has a waiver been granted for that unit?

____ Yes ____ No ____ NA

4. Are representative samples of the sludge and supernatant from the surface impoundment tested separately, acceptably, and in accordance with the sampling frequency and analysis specified in the waste analysis plan?

____ Yes ____ No

Attach test results.

5. Do the hazardous waste residues (sludges or liquids) exceed the treatment standards specified in 268.41, or where no treatment standards are established for a waste, the applicable prohibition levels?

____ Yes ____ No

E. **Land Disposal**

1. Are restricted wastes placed in land disposal units such as landfills, surface impoundments, waste piles, wells, land treatment units, salt domes/beds, mines/caves, or concrete vault or bunker?

   ____ Yes ____ No

   Note: Do not include surface impoundments addressed in D, Treatment in Surface Impoundments.

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

2. Are these wastes disposed of in a new, replacement, or laterally expanded landfill or impoundment that meets the minimum technology requirements (double liner and leachate collection) and groundwater monitoring?

   ____ Yes ____ No

3. Does the facility operating record have notices, certifications, and demonstration (if applicable) from generators/storer/treaters for 5 years [268.7(c); 268.7(a),(b)]?

   ____ Yes ____ No

4. Does the facility obtain waste analysis data or test the wastes (according to the waste analysis plan) to determine that the wastes comply with the applicable treatment standards [268.7(c)]?

   ____ Yes ____ No

   If yes, at what frequency? _____

5. If restricted wastes that exceed the treatment standards are placed in land disposal units (excluding national capacity variances) [268.30(a)], does facility have an approved waiver based on no migration petition [268.6], an approved case-by-case capacity extension [268.5], or variance [268.44]?

   ____ Yes ____ No

6. Does the facility dispose of restricted wastes that are subject to a national capacity variance?

   ____ Yes ____ No

ENVIRITE CORPORATION
TECHNOLOGY FOR THE ENVIRONMENT

February 28, 1989

Maggie Allegretti
Amerdec
90 Lebaron
Waukegan, IL 60085

Dear Ms. Allegretti,

We have received both of your samples, and they have been submitted to our lab. We are estimating that it will take approximately three to five weeks for the samples to be completed.

If you have any questions, please call.

Sincerely,

Douglas Newman
Sales Manager

DAN:dew

16435 SOUTH CENTER AVENUE HARVEY, ILLINOIS 60426-6078 PHONE: (312) 596-7040

AMERDEC, INC

90 Le Baron
Waukegan, Il 60085
312 623 6650

RECEIVED
MAR 6 - 1989
OFFICE OF RCRA
WASTE MANAGEMENT DIVISION
EPA, REGION V

March 2nd, 1989

Ms. Barbara Russell FHR-12 Docket V-W-88-R-D18
U.S. EPA
230 S. Dearborn St
Chicago, Il 60604

Dear Ms. Russell:

I am enclosing a copy of a letter that was just sent to me by Envirite.

I submitted the samples of the material to them on January 25th but apparently there is a great backlog according to Mr. Newman.

This will give you an idea as to when the material should be removed from our premises.

If any other information is forthcoming I will let you know immediately.

I have not heard from you as to an "extension" which I will need.

I appreciate any help you can give.

Sincerely,

Magdalene Allegretti

Mrs. Allegretti

ma

encl.

24 FEB 1989

5HR-12

Mrs. Magdalene Allegretti
Amerdec Incorporated
90 LeBaron
Waukegan, Illinois 60085

Re: Amerdec, Inc.
ILD 161 401 476
CAFO, Docket No. V-W-88-R-018

Dear Mrs. Allegretti:

Per your telephone conversation on January 23, 1989, with Ms. Barbara Russell, of my staff, we are enclosing a list of consultants that can assist you in preparing a closure plan and certify closure.

Please be advised that the United States Environmental Protection Agency and the Illinois Environmental Protection Agency do not endorse any of the consultants appearing on this list.

If you have any further questions on this matter, please contact Ms. Russell at (312) 353-7922.

Sincerely yours,

Paul E. Dimock, Chief
IL/MI/WI Enforcement Program Section

Enclosure

cc: Harry Chappel, IEPA, CMS
Glen Savage, IEPA, FOS
John Maher, IEPA, Maywood Office

bcc: Richard Clarizio, ORC

RCRA ENFORCEMENT	REB STAFF	REB SECTION CHIEF	REB CHIEF
INIT. DATE	2/23/89	2.24-89	

CONSULTANTS

Charles Licht Engineering
Associates, Inc.
Post Office Box 315
Olympia Fields, IL 60461
312/755-0075

Gabriel and Associates
1814 North Marshfield
Chicago, IL 60622
312/486-2123

Petrochem Services, Inc.
P.O. Box 337
Lemont, IL 60439
312/739-1150

HARZA Environmental
Services, Inc.
150 South Wacker Drive
Chicago, IL 60606-4288
312/855-3300

Camp Dresser & McKee Inc.
11 East Adams Street
Suite 1100
Chicago, IL 60603
312/786-1313

Scientific Control
Laboratories, Inc.
3158 S. Kolin Avenue
Chicago, IL 60623
312/254-2406

Eldridge Engineering
1601 Bond
Naperville, IL
312/369-2901

MAECORP Incorporated
17450 S. Halsted St.
Homewood, IL 60430
312/957-7600

Mid-America Environment
Service, Inc.
13840 S. Halsted St.
Riverdale, IL 60627
312/841-7020

RECEIVED
JAN 24 1989
OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION V

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

(217) 782-5544

Refer to: 0971900034--Lake County
Waukegan/Amerdec
Compliance File

RECEIVED
FEB 22 1989
U.S. EPA, REGION V
WASTE MANAGEMENT DIVISION
OFFICE OF THE DIRECTOR

REQUEST FOR COMPLIANCE ORDER

February 21, 1989

Mr. Basil Constantelos, Director
Waste Management Division
U.S. Environmental Protection Agency
Region V
230 South Dearborn
Chicago, Illinois 60604

Dear Mr. Constantelos:

This Agency hereby requests that you issue a Compliance Order and enforce the September 9, 1988 Consent Agreement and Final Order (CAFO) against the above referenced facility. The basis of the new Compliance Order and enforcement of the September 9, 1988 CAFO is a violation of the CAFO. The enclosed information has been prepared by this Agency to support this enforcement action against Amerdec.

The CAFO at page 4 #5 required Amerdec to submit a closure plan for the hazardous waste storage facility within 45 days of the effective date of the CAFO. A closure plan has not been received by either USEPA or IEPA.

Any questions regarding Amerdec's failure to submit a closure plan can be directed to John Maher at 312/345-9780.

Paul Jagiello is the attorney handling this matter. If you have any questions, you can contact him at 312/345-9780.

Very truly yours,

Gary P. King

Gary P. King
Senior Attorney
Enforcement Programs

GPK:PRJ:bh:3254B

cc: Bill Muno
Maywood Region
Angela Tin
John Maher
DLPC Division File
Docket Control (Linda Cooper)
Paul Jagiello

AMERDEC, INC

90 Le Baron
Waukegan, Il 60085
312 623 6650

January 26, 1989

RECEIVED
JAN 27 1989
OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION V

Ms. Barbara Russell FHR-12
U. S. EPA
230 S. Dearborn St
Chicago, Il 60604

Docket V-W-88-R-018

Dear Ms. Russell:

With reference to the materials which are to be hauled away according to the Consent Agreement and Final Order, I would appreciate an extension of at least 30 days to be able to expedite the removal of same.

The chromic acid is contained in regulation DOT drums.

The solids, however, are contained in lined metal drums. This type of packaging is unacceptable to Envirite which will be the wast hauler.

When the solids were placed in the lined, 55 gallon drums we were unaware that this type of packaging had become obsolete as far as Envirite was concerned. They, Envirite, have made some changes in that they have a special means of handling this waste.

We are also having the ion exchange resins (which originally were to be re regenerated and reclaimed) hauled away.

Samples of this material had to be submitted to Envirite and this has been done as of 1/25.

We will be transferring the materials from the metal drums to specially designed bags, Envirite's requirements) on Saturday, January 28.

It will take at least another month to enable us to finalize this procedure.

I will appreciate hearing from you.

Thank you for any help that you may render.

Very truly yours,

Magdalene Allegretti

Magdalene Allegretti

ma

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

IN THE MATTER OF:	)	DOCKET NO.
	)	
AMERDEC, INC. 90 LEBARON WAUKEGAN, ILLINOIS 60085	)))	COMPLAINT, FINDINGS OF VIOLATION AND COMPLIANCE ORDER
	)	
NON-NOTIFIER	)	

This Complaint is filed pursuant to Section 3008(a)(1) of the Resource Conservation and Recovery Act of 1976 as amended (RCRA), 42 U.S.C. §6928(a)(1), and the United States Environmental Protection Agency's Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation or Suspension of Permits, 40 CFR Part 22. The Complainant is the Director, Waste Management Division, Region V, United States Environmental Protection Agency (U.S. EPA). The Respondent is Amerdec, Inc., 90 LeBaron, Waukegan, Illinois 60085.

This Complaint is based on information obtained by the U.S. EPA, including compliance inspections conducted by the Illinois Environmental Protection Agency (IEPA) on January 29, 1987, and February 18, 1987. At the time of the inspections, violations of applicable State and Federal regulations were identified.

Pursuant to 42 U.S.C. §6928(a)(1), and based on the information cited above, it has been determined that Amerdec, Inc. has violated 35 Ill. Adm. Code 703.121, 723.111, 723.112, 723.120(a), 724.111, ~~724.112(c)~~, 724.113(a) and (b), 724.114(a), space (b), and (c), 724.115(a), space (b), and (d), 724.131, 724.135, 724.137, 724.151(a), 724.153, 724.173, 724.175, 724.176, 724.212(a), 724.242(a), 724.271, 724.273(a), and 724.274.

← Program agreed to take out.

JURISDICTION

Jurisdiction for this action is conferred upon U.S. EPA by Sections 2002(a)(1), 3006(b), and 3008 of RCRA, 42 U.S.C. §6912(a)(1), §6926(b), and §6928, respectively.

On January 30, 1986, the State of Illinois was granted final authorization by the Administrator of U.S. EPA pursuant to Section 3006(b) of RCRA, 42 U.S.C. §6926(b), to administer a hazardous waste program in lieu of the Federal program. See 51 Federal Register 3778 (1986). As a result, facilities in Illinois qualifying for interim status under 40 CFR 270.70 are regulated under the Illinois provisions found at 35 Ill. Adm. Code Part 720 et seq., rather than the Federal regulations set forth at 40 CFR Part 265. Section 3008 of RCRA, 42 U.S.C. §6928, provides that U.S. EPA may enforce State regulations in those States authorized to administer a hazardous waste program. Notice to IEPA pursuant to this section was provided by U.S. EPA on August 26, 1987.

FINDINGS OF VIOLATION

This determination of violation is based on the following:

1. Respondent, Amerdec, Inc., is a person defined by Section 1004(15) of RCRA, 42 U.S.C. §6903(15), and 35 Ill. Adm. Code 702.110, who owns and operates a facility at 90 LeBaron, Waukegan, Illinois 60085 that stores hazardous waste.

2. Section 3010(a) of RCRA, 42 U.S.C. §6930(a), requires any person who generates or transports hazardous waste, or owns or operates a facility for the treatment, storage, or disposal of hazardous waste, to notify U.S. EPA of such activity within 90 days of the promulgation of regulations under Section 3001 of RCRA. Section 3010 of RCRA also provides that no hazardous waste subject to regulations may be transported, treated, stored or disposed unless the required notification has been given.

3. U.S. EPA first published regulations concerning the generation, transportation, treatment, storage or disposal of hazardous waste on May 19, 1980. These regulations are codified at 40 CFR Parts 260 through 265. Notification to U.S. EPA of hazardous waste activity was required in most instances no later than August 18, 1980.

4. Section 3005(a) of RCRA requires U.S. EPA to publish regulations requiring each person owning or operating a hazardous waste treatment, storage, or disposal facility to obtain a RCRA Permit. Such regulations were published on May 19, 1980, and are codified at 40 CFR Parts 270 and 271 (formerly Parts 122 and 123). The regulations require that persons who treat, store, or dispose of hazardous waste submit Part A of the permit application in most instances no later than November 19, 1980.

5. Section 3005(e) of RCRA provides that an owner or operator of a facility shall be treated as having been issued a permit pending final administrative disposition on the permit application provided that: (1) the facility was in existence on November 19, 1980; (2) the requirements of Section 3010(a) of RCRA concerning notification of hazardous waste activity have been complied

with; and (3) an application for a permit has been made. This statutory authority to operate is known as interim status. U.S. EPA regulations implementing these provisions are found at 40 CFR Part 270.

6. The Respondent was not in existence on November 18, 1980, therefore, the Respondent is not eligible to obtain interim status.

7. The Respondent failed to submit Part A and B of the Permit Application and receive a final RCRA permit prior to storing hazardous waste at ~~this~~ its facility as required by Section 3005(a) of RCRA and to meet the standards for owner(s) and operators of hazardous waste treatment, storage, and disposal facilities contained in 40 CFR Part 264.

8. The Respondent, Amerdec, Inc., stored wastewater treatment sludge from eletroplating operations. This waste has been identified and listed as a hazardous waste under Section 3001 of the Act and 40 CFR 261.31 (U.S. EPA Hazardous Waste No. F006).

9. On January 29, 1987, and February 18, 1987, the IEPA conducted RCRA inspections of Respondent's facility and observed the following violations on the dates parenthetically noted below:

a. Failure to obtain a RCRA Permit prior to storing hazardous waste, as required by 35 Ill. Adm. Code 703.121; (January 29, 1987) (February 18, 1987);

b. Failure to obtain a U.S. EPA identification number prior to transporting hazardous waste, as required by 35 Ill. Adm. Code 723.111; (January 29, 1987) (February 18, 1987);

c. Failure to store transported hazardous waste less than 10 days. Failure to store hazardous waste in containers that meet the packaging requirements of 722.130, as required by 35 Ill. Adm. Code 723.112; (January 29, 1987) (February 18, 1987);

d. Failure to obtain a signed manifest prior to accepting hazardous waste from a generator, as required by 35 Ill. Adm. Code 723.120(a); (January 29, 1987) (February 18, 1987);

Program agreed to dismiss

e. Failure to obtain a U.S. EPA identification number prior to treating and storing hazardous waste, as required by 35 Ill. Adm. Code 724.111; (January 29, 1987) (February 18, 1987);

This is confusing what new owner? The Prior Finding are silent on this.

~~f. Failure to notify in writing to the new owner or operator of the requirements of 35 Ill. Adm. Code 724 and 40 CFR Part 122, as required by 35 Ill. Adm. Code 724.112(c); (January 29, 1987) (February 18, 1987);~~

g. Failure to obtain a detailed chemical and physical analysis of a representative sample of hazardous waste prior to storage, and failure to have a detailed written waste analysis plan on file, as required by 35 Ill. Adm. Code 724.113(a) and (b); (January 29, 1987) (February 18, 1987);

h. Failure to prevent unknowing entry and minimize the possibility for the unauthorized entry onto the active portion of the facility. Failure to provide 24-hour surveillance or a means to control unauthorized entry into the active portion of the facility. Failure to post a "Danger-Unauthorized Personnel Keep Out" sign at each entrance, as required by 35 Ill. Adm. Code 724.114(a), (b), and (c); (January 29, 1987) (February 18, 1987);

i. Failure to inspect the facility for malfunction and deterioration, operator errors and discharges; failure to develop and follow a written inspection schedule; and failure to record inspections in an inspection log or summary, as required by 35 Ill. Adm. Code 724.115(a), (b), and (d); (January 29, 1987) (February 18, 1987);

j. Failure to maintain facility to minimize hazardous situations affecting the environment or human health, as required by 35 Ill. Adm. Code 724.131; (January 29, 1987) (February 18, 1987);

k. Failure to maintain aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment and decontamination equipment to any area of facility operation in an emergency, as required by 35 Ill. Adm. Code 724.135; (January 29, 1987) (February 18, 1987);

l. Failure to familiarize local authorities with hazardous aspects of the facility, as required by 35 Ill. Adm. Code 724.137; (January 29, 1987) (February 18, 1987);

m. Failure to have a contingency plan on file as required by 35 Ill. Adm. Code 724.151(a) (January 29, 1987) (February 18, 1987);

n. Failure to provide copies of the contingency plan to all organizations that may be called upon to provide emergency service; as required by 35 Ill. Adm. Code 724.153; (January 29, 1987) (February 18, 1987);

o. Failure to keep a written operating record at the facility, as required by Ill. Adm. Code 724.173; (January 29, 1987) (February 18, 1987);

p. Failure to submit a copy of an annual report to the Agency by March 1, for year 1986, as required by Ill. Adm. Code 724.175; (January 29, 1987) (February 18, 1987);

q. Failure to submit an unmanifested waste report to the Agency within 15 days after receiving waste, as required by Ill. Adm. Code 724.176; (January 29, 1987) (February 18, 1987);

r. Failure to have a written closure plan, as required by Ill. Adm. Code 724.212(a); (January 29, 1987) (February 18, 1987);

s. Failure to have a written estimate in current dollars of the cost of closing the facility, as required by Ill. Adm. Code 724.242(a); (January 29, 1987) (February 18, 1987);

t. Failure to maintain containers in good condition, as required by Ill. Adm. Code 724.271; (January 29, 1987) (February 18, 1987);

u. Failure to store containers closed and upright during storage, as required by Ill. Adm. Code 724.273(a); (January 29, 1987) (February 18, 1987);

v. Failure to conduct weekly inspections of containers, as required by Ill. Adm. Code 724.274; (January 29, 1987) (February 18, 1987);

~~10.~~ 11. On April 13, 1987, the IEPA sent the Respondent a Pre-Enforcement Conference Letter citing the violations observed during the January 29, and February 18, 1987, inspections. The letter also scheduled a Pre-Enforcement Conference for April 23, 1987.

12. ~~11.~~ The Pre-Enforcement Conference was held on May 4, 1987. Since an Agreement was not reached, Respondent agreed to resume discussions on May 11, 1987. Respondent failed to appear for the meeting as scheduled.

13. ~~12.~~ On July 28, 1987, the IEPA referred the matter to the U.S. EPA for formal enforcement action.

14. ~~13.~~ This enforcement action and resultant penalty are based on violations of 35 Ill. Adm. Code Parts 703, 723, and 724.

COMPLIANCE ORDER

Respondent having been initially determined to be in violation of the above cited rules and regulations, the following Compliance Order pursuant to Section 3008 of RCRA, 42 U.S.C. §6928, is entered:

A. Respondent shall, immediately upon this order becoming final, cease all treatment, storage or disposal of any hazardous waste ~~except such treatment, storage or disposal as shall be in compliance with the standards for hazardous waste treatment, storage, and disposal facilities~~ except as provided for in Paragraphs B and C below.

B. Respondent shall immediately repackage hazardous waste into containers that are in good condition and store containers in a secured area.

C. Respondent shall, within thirty (30) days of this Order becoming final, achieve compliance with the following requirements.

1. Submit to IEPA a closure plan for the storage facility. The plan shall be prepared in accordance with the standards for such plans

contained in 35 Ill. Adm. Code Part 724, and shall detail the activities to be accomplished by the Respondent to remove and properly dispose of all hazardous waste at the facility. IEPA will approve, disapprove, or modify this plan.

2. Within 30 days of IEPA approval or modification of the closure plan, Respondent shall complete closure of the facility, in accordance with the approved closure plan and shall submit a certification of closure, as required by 35 Ill. Adm. Code 724.215.

D. Respondent shall notify U.S. EPA in writing upon achieving compliance with this Order and any part thereof. This notification shall be submitted no later than the time stipulated above to the Waste Management Division, U.S. EPA, Region V, 230 South Dearborn Street, Chicago, Illinois 60604, Attention: Barbara Russell, RCRA Enforcement Section (5HE-12).

A copy of these documents and all correspondence with U.S. EPA regarding this Order shall also be submitted to Gary King, Senior Attorney, Division of Enforcement Services, Illinois Environmental Protection Agency, 2200 Churchill Road, P.O. Box 19276, Springfield, Illinois 62974-9276

Notwithstanding any other provision of this Order, an enforcement action may be brought pursuant to Section 7003 of RCRA or other statutory authority where the handling, storage, treatment, transportation, or disposal of solid or hazardous waste at this facility may present an imminent and substantial endangerment to human health or the environment.

PROPOSED CIVIL PENALTY

In view of the above determination and in consideration of the seriousness of the violations cited herein, the potential harm to human health and the

environment, the continuing nature of the violations, and the ability of the Respondent to pay penalties, the Complainant proposes to assess a civil penalty in the amount of FORTY-FIVE THOUSAND DOLLARS ($45,000) against the Respondent, Amerdec, Inc., pursuant to Sections 3008(c) and 3008(g) of RCRA, 42 U.S.C. §6928. Attachment 1 to the Complaint provides a detailed summary of the proposed civil penalty. Payment shall be made by certified or cashier's check payable to the Treasurer of the United States of America and shall be mailed to U.S. EPA, Region V, P.O. Box 70753, Chicago, Illinois 60673. Copies of the transmittal of the payment should be sent to both the Regional Hearing Clerk (5MF-1~~4~~C), Planning and Management Division, and the Solid Waste and Emergency Response Branch Secretary (5CS-TUB-3), Office of Regional Counsel, U.S. EPA, ~~111 West Jackson Boulevard~~ 230 S. Dearborn St., Chicago, Illinois 60604.

Failure to comply with any requirements of the Order shall subject the above-named Respondent to liability for a civil penalty of up to TWENTY-FIVE THOUSAND DOLLARS ($25,000) for each day of continued noncompliance with the deadlines contained in this Order. U.S. EPA is authorized to assess such penalties pursuant to RCRA Section 3008(c).

insert 2)

NOTICE OF OPPORTUNITY FOR HEARING

The above-named Respondent has the right to request a hearing to contest any material factual allegation set forth in the Complaint and Compliance Order or the appropriateness of any proposed compliance schedule or penalty. Unless said Respondent has filed an answer not later than thirty (30) days from the date this Complaint is served, Respondent may be found in default of the above Complaint and Compliance Order.

To avoid a finding of default by the Regional Administrator, Respondent must file a written answer to this Complaint with the Regional Hearing Clerk (5MF-14), Planning and Management Division, U.S. EPA, Region V, 230 South Dearborn Street, Chicago, Illinois 60604, within thirty (30) days of receipt of this notice. A copy of Respondent's answer and any subsequent documents filed in this action should be sent to , Assistant Regional Counsel (5CS-TUB-3), Office of Regional Counsel, U.S. EPA, Region V, ~~111 West Jackson Boulevard~~, Chicago, Illinois 60604. Failure to answer within thirty days of receipt of this Complaint may result in a finding by the Regional Administrator that the entire amount of penalty sought in the Complaint is due and payable and subject to the interest and penalty provisions contained in the Federal Claims Collection Act of 1966, 31 U.S.C. §3701 et seq.

Respondent's answer should clearly and directly admit, deny, or explain each of the factual allegations of which Respondent has knowledge. Said answer should contain (1) a definite statement of the facts which constitute the grounds of defense, and (2) a concise statement of the facts which Respondent intends to place at issue in the hearing. The denial of any material fact, or the raising of any affirmative defense, shall be construed as a request for a hearing.

The Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation or Suspension of Permits, 40 CFR Part 22, are applicable to this administrative action.

SETTLEMENT CONFERENCE

Whether or not Respondent requests a hearing, Respondent may confer informally with U.S. EPA concerning: (1) whether the alleged violations in fact occurred as set forth above; (2) the appropriateness of the compliance schedule; and (3) the appropriateness of any proposed penalty in relation to the size of Respondent's business, the gravity of the violations, and the effect of the proposed penalty on Respondent's ability to continue in business. Respondent may request an informal settlement conference at any time by contacting this office. Any such request, however, will not affect either the thirty-day time limit for responding to this Complaint or the thirty-day time limit for requesting a formal hearing on the violations alleged herein.

U.S. EPA encourages all parties to pursue the possibilities of settlement through informal conferences. A request for an informal conference should be made in writing to Barbara Russell, RCRA Enforcement Section (5HE-12), U.S. Environmental Protection Agency, 230 South Dearborn Street, Chicago, Illinois 60604, or by calling her at (312) 353-7922.

Dated this_____day of_____, 1988.

_____
Basil G. Constantelos, Director
Waste Management Division
Complainant
U.S. Environmental Protection Agency
Region V

CERTIFICATE OF SERVICE

I hereby certify that I have caused a copy of the foregoing Complaint to be served upon the persons designated below, on the date below, by causing said copies to be deposited in the U.S. Mail, First Class and certified-return receipt requested, postage prepaid, at Chicago, Illinois, in envelopes addressed to:

Magdelene Allegretti, President
Amerdec, Inc.
90 LeBaron
Waukegan, Illinois 60085

These are said persons' last addresses known to the subscriber.

I have further caused the original of the Complaint and this Certificate of Service to be served in the Office of the Regional Hearing Clerk located in the Planning and Management Division, U.S. EPA, Region V, 230 South Dearborn Street, Chicago, Illinois 60604, on the date below.

Dated this_____day of _____, 1988.

_____
Secretary, Hazardous Waste Enforcement Branch
U.S. EPA, Region V

ATTACHMENT 1

PENALTY SUMMARY

Regulation Applicable at Time of Violation *	Corresponding Federal Regulation 40 CFR	Nature of Requirement [Date of Violation]	Penalty Assessed
703.121	270.1(c)	RCRA Permit [1/29/87][2/18/87]	
724.111	264.11	Identification [1/29/87][2/18/87]	
724.112(c)	264.12(c)	Required Notices [1/29/87][2/18/87]	
724.113(a)&(b)	264.13(a)&(b)	Waste Analysis [1/29/87][2/18/87]	
724.114(a),(b)&(c)	264.14(a),(b)&(c)	Security [1/29/87] [2/18/87]	
724.115(a),(b)&(d)	264.15(a),(b)&(d)	Inspection Requirements [1/29/87][2/18/87]	
724.131	264.31	Design and Operation of Facility [1/29/87] [2/18/87] Aisle	
724.135	264.35	Required Isle Space [1/29/87][2/18/87]	
724.137	264.37	Arrangements with Local Authorities [1/29/87] [2/18/87]	
724.151(a)	264.51(a)	Purpose and Implementation of Contingency Plan [1/29/87] [2/18/87]	$22,500
724.153	264.53	Copies of Contingency Plan [1/29/87] [2/18/87]	
724.173	264.73	Operating Record [1/29/87] [2/18/87]	
724.175	264.75	Annual Report [1/29/87] [2/18/87]	
724.176	264.76	Unmanifested Waste Report [1/29/87] [2/18/87]	
724.212(a)	264.112(a)	Closure Plan [1/29/87] [2/18/87]	
724.242(a)	264.142(a)	Cost Estimate for Closure [1/29/87] [2/18/87]	
724.271	264.171	Condition of Containers [1/29/87] [2/18/87]	
724.273(a)	264.173(a)	Management of Containers [1/29/87] [2/18/87]	
724.274	264.174	Inspections [1/29/87] [2/18/87]	space ~~$22,500~~
723.111	263.11	U.S. EPA Identification number [1/29/87] [2/18/87]	
723.112	263.12	Transfer Facility Requirements [1/29/87] [2/18/87]	$22,500
723.120(a)	263.20(a)	Manifest System [1/2~~8~~9/87] [2/18/87]	~~$22,500~~
		Total	~~$90,500~~ $45,000

Some have one space, some don't. Be consistent

* 35 Ill. Adm. Code

Insert 1

8 The Respondent Amerdec, Inc., stored on its property 11 barrels containing ~~or~~ spent chrome solution, index filter waste ~~and~~ spent resins identified and listed as ~~a~~ hazardous waste under Section 3001 of the Act, 40 CFR 261.31 and 35 IAC 721.131 (U.S. EPA Hazardous Waste Numbers D007 and F006).

9. ~~The~~ On January 29, 1987, Mr. Thomas Allegretti, Manager of Amerdec, Inc. ~~admitted to~~ informed Mr. John Maher, Inspector, Illinois Environmental Protection Agency (IEPA) that in November of 1986 Amerdec transported 7 barrels of the above wastes from 4425 W. Montrose, Chicago, Illinois to Amerdec's present location at 90 Le Baron, Waukegan, Illinois. Furthermore, he informed Mr. Maher that Amerdec did not have the necessary ~~plans~~ records and plans discussed below in item 10.

Insert 2

The U.S. EPA may collect interest on any amount overdue under the terms of this Order at the rate established by the Secretary of the Treasury pursuant to 31 U.S.C. §3717. A late payment handling charge of $20.00 will be imposed after thirty (30) days, with an additional charge of $10.00 for each subsequent 30-day period over which

(over)

an unpaid balance remains. In addition a six percent per annum penalty will be applied on any principal amount not paid within ninety (90) days of the date on which each payment is due.

P 246 527 358

RECEIPT FOR CERTIFIED MAIL

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

US EPA ~~5HR-13~~ B. RUSSELL 5HR-11

SENT TO M. ALLEGRETTI
AMERDEC

STREET AND NO. 90 Le Baron

P.O., STATE AND ZIP CODE Waukegan, IL

POSTAGE		$ 65
CONSULT POSTMASTER FOR FEES	CERTIFIED FEE	85 ¢
OPTIONAL SERVICES	SPECIAL DELIVERY	¢
	RESTRICTED DELIVERY	¢
RETURN RECEIPT SERVICE	SHOW TO WHOM AND DATE DELIVERED	¢
	SHOW TO WHOM, DATE, AND ADDRESS OF DELIVERY	90 ¢
	SHOW TO WHOM AND DATE DELIVERED WITH RESTRICTED DELIVERY	¢
	SHOW TO WHOM, DATE AND ADDRESS OF DELIVERY WITH RESTRICTED DELIVERY	¢
TOTAL POSTAGE AND FEES		$2.40
POSTMARK OR DATE		

CHICAGO IL SEP 13 1988 USPO

PS Form 3800, Apr. 1976

SENDER: Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.
Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.
1. ☐ Show to whom delivered, date, and addressee's address. ↑(Extra charge)↑
2. ☐ Restricted Delivery ↑(Extra charge)↑

3. Article Addressed to:
M. ALLEGRETTI - AMERDEC
90 Le Baron
Waukegan, IL

4. Article Number
246 527 358

Type of Service:
☐ Registered ☐ Insured
☐ Certified ☐ COD
☐ Express Mail

Always obtain signature of addressee or agent and DATE DELIVERED.

5. Signature — Addressee
X M. Allegretti

6. Signature — Agent
X

7. Date of Delivery 9/15/88

8. Addressee's Address *(ONLY if requested and fee paid)*

PS Form **3811**, Mar. 1987 ★ U.S.G.P.O. 1987-178-268 **DOMESTIC RETURN RECEIPT**

UNITED STATES POSTAL SERVICE

OFFICIAL BUSINESS

SENDER INSTRUCTIONS

Print your name, address, and ZIP Code in the space below.

- Complete items 1, 2, 3, and 4 on the reverse.
- Attach to front of article if space permits, otherwise affix to back of article.
- Endorse article "Return Receipt Requested" adjacent to number.

5HR-13

REB B. RUSSELL

U.S.MAIL

PENALTY FOR PRIVATE USE, $300

RETURN TO

Print Sender's name, address, and ZIP Code in the space below.

UNITED STATES OF AMERICA
ENVIRONMENTAL PROTECTION AGENCY
230 S. DEARBORN
CHICAGO IL 60604

~~[illegible]~~

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

SEP 13 1988

REPLY TO THE ATTENTION OF:

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mrs. Magdalene Allegretti
Amerdec, Inc.
90 Le Baron
Waukegan, Illinois 60085

re: Consent Agreement and Final Order

Dear Mrs. Allegretti:

This letter is to acknowledge receipt of the Consent Agreement and Final Order (CAFO) signed by yourself. A fully executed copy of the CAFO is enclosed for your file.

Your cooperation in resolving this matter is appreciated.

Sincerely yours,

David A. Ullrich

Dave Ullrich
Associate Division Director
Office of RCRA

Enclosure

cc: Gary King, IEPA
Glen Savage, IEPA
Harry Chappel, IEPA

5HR-12

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mrs. Magdalene Allegretti
Amerdec, Inc.
90 Le Baron
Waukegan, Illinois 60085

Re: Consent Agreement and Final Order

Dear Mrs. Allegretti:

This letter is to acknowledge receipt of the Consent Agreement and Final Order signed by yourself. A fully executed copy of the Consent Agreement and Final Order is enclosed for your file.

Your cooperation is resolving this matter is appreciated.

Sincerely yours,

William E. Muno, Acting
Associate Director
Office of RCRA

Enclosure

cc: Gary King, IEPA
Glen Savage, IEPA
Harry Chappel, IEPA

duck 9/12/88

JR 8/30/88 9/6/88

	TYP	AUTH	IL/IN TECH. ENF. SEC.	MI/WI TECH. ENF. SEC.	OH/MN TECH. ENF. SEC.	IL/MI/WI ENF. PROG. SECTION	IN/MN/OH ENF. PROG. SECTION	RCRA [illegible]	O.C. [illegible]	[illegible]
	O.R. 8/29/88					P.E.N 8-30-88		SKS 9-1-88		

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

IN THE MATTER OF:	)	DOCKET NO.: V-W-88-R-018
	)	
AMERDEC, INC	)	CONSENT AGREEMENT AND FINAL ORDER
	)	
90 LE BARON	)	
	)	
WAUKEGAN, ILLINOIS 60085	)	
	)	
U.S. EPA I.D. NO.: ILD 161 401 476	)	

RECEIVED
SEP 12 1988
REGIONAL HEARING CLERK
U.S. ENVIRONMENTAL
PROTECTION AGENCY

PREAMBLE

On April 15, 1988, a Complaint and Compliance Order was filed in this matter pursuant to Section 3008(a)(1) of the Resource Conservation and Recovery Act of 1976 (RCRA) as amended, 42 U.S.C. §6928(a)(1), and the United States Environmental Protection Agency's Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation or Suspension of Permits, 40 CFR Part 22. The Complainant is the Director of the Waste Management Division, Region V, United States Environmental Protection Agency (U.S. EPA). The Respondent is Amerdec, Inc.

The Complaint and Compliance Order alleges the Respondent to be in violation of Ill. Rev. Stat., Ch. 111 1/2, Section 1001 et seq., and regulatory requirements set forth at 35 Ill. Adm. Code Part 720 et seq.

STIPULATIONS

The Parties to this action, desiring to settle this action and believing that this settlement is in the public interest, stipulate to the following:

1. The Respondent owns and operates a facility located on 90 LeBaron, Waukegan, Illinois;

2. The Respondent has been served with a copy of the Complaint and Compliance Order;

3. The Respondent admits the jurisdictional allegations in the Complaint and Compliance Order;

4. The Respondent, other than the admissions made in its Answer, neither admits nor denies the specific factual allegations contained in the Complaint and Compliance Order;

5. The Respondent explicitly waives its rights to request a hearing on the allegations of the Complaint filed herein;

6. The Respondent consents to and will not contest issuance of the Order hereinafter recited, and hereby consents to the payment of a civil penalty in the amount of ONE THOUSAND DOLLARS ($1,000);

7. On January 30, 1986, the State of Illinois was granted final authorization by the Administrator of the U.S. EPA, pursuant to Section 3006(b) of RCRA, 42 U.S.C. §6926(b), to administer a hazardous waste program in lieu of the Federal program. Section 3008 of RCRA, 42 U.S.C. §6928, provides that the U.S. EPA may enforce State regulations in those States authorized to administer a hazardous waste program; and

8. This Consent Agreement and Final Order shall become effective on the date it is signed by the Regional Administrator.

FINAL ORDER

Based upon the foregoing stipulations, before the taking of any testimony, without the trial or adjudication of any issue of fact or law, with the consent of the parties, and the Regional Administrator having considered this matter and being duly advised, IT IS ORDERED as follows:

A. All activities undertaken pursuant to this Order shall be carried out in accordance with all applicable regulatory requirements, including RCRA and the regulations promulgated thereunder.

B. Respondent shall, as of the effective date of this Order, achieve compliance with the standards applicable to generators of hazardous waste, except as provided below:

1. Respondent shall immediately, upon the effective date of this Order obtain an U.S. EPA hazardous waste identification number.

2. Respondent shall immediately, upon the effective date of this Order repackage the hazardous waste in containers that are in good condition, and are placed in a properly secured area as required in 35 Ill. Adm. Code 725.

3. Respondent shall, within 45 days of the effective date of this Order remove all non-resinous waste in storage on-site to a permitted or interim status hazardous waste facility.

4. For the resinous waste contained on-site the Respondent shall complete the following:

a. Within 15 days of the effective date of this Order submit to IEPA an acceptable pre-treatment permit application and any other required certifications for the effluent from the treatment of the resinous waste;

b. Within 60 days of the effective date of this Order ensure that the equipment necessary to treat the waste is installed and operable;

c. Within 15 days after IEPA's final decision on any pre-treatment permit either complete treatment of the resinous waste or arrange for its transport off-site to a permitted or interim status hazardous waste facility. Respondent must transport all hazardous waste residues from the treatment of the resinous waste to a permitted or interim status hazardous waste facility within 15 days after IEPA's approval of any pre-treatment permit.

5. Respondent shall, within 45 days of the effective date of this Order, submit a closure plan for the hazardous waste storage facility. The plan shall be prepared by the firm which will provide the independent registered professional engineer who will certify closure and will meet the standards for such plans contained in 35 Ill. Adm. Code Part 725 and will describe the process which the Respondent proposes to use to treat the resinous waste contained on-site.

C. Respondent shall, notify U.S. EPA in writing upon achieving compliance with this Order and any part thereof. Respondent shall, within sixty (60) days of the effective date of this order, provide U.S. EPA with a sworn statement of compliance with the terms of this Order signed by a duly authorized officer or director of Respondent's corporation. Included

with the statement shall be a copy of the manifests used to transport the non-resinous waste off-site and a copy of the closure plan referred to in paragraph 5 above.

This notification shall be submitted no later than the time stipulated above to the Waste Management Division, U.S. EPA, Region V, 230 South Dearborn Street, Chicago, Illinois 60604. Attention: Barbara Russell, IL/MI/WI Enforcement Programs Section (5HR-12).

A copy of these documents and all correspondence with U.S. EPA regarding this Order shall also be submitted to Gary King, Senior Attorney, Division of Enforcement Services, Illinois Environmental Protection Agency, 2200 Churchill Road, P.O. Box 19276, Springfield, Illinois 62974-9276.

D. Respondent shall, pay a civil penalty in the amount of ONE THOUSAND DOLLARS ($1,000), payment should be made in two FIVE HUNDRED DOLLAR ($500) installments. The first and second installments are due within thirty (30) days and one hundred twenty (120) days, respectively, of the effective date of this Order. Payment should be made to the Treasurer of the United States of America and mailed to U.S. EPA, Region V, P.O. Box 70753, Chicago, Illinois 60673. A copy of the transmittal of payment shall be mailed to Ms. Regina King, Regional Hearing Clerk (5MF-14), Planning and Management Division, U.S. EPA, 230 South Dearborn Street, Chicago, Illinois 60604 and to the SWER Branch Secretary (5CS-TUB-3), Office of Regional Counsel, U.S. EPA, 111 West Jackson Boulevard, Chicago, Illinois 60604.

E. Interest shall accrue on any amounts overdue under the terms of this Order at the rate established by the Secretary of the Treasury pursuant to 31 U.S.C. §3717. A late payment charge of $20.00 will be imposed after thirty (30) days, with an additional charge of $10.00 for each subsequent 30-day period over which an unpaid balance remains. In addition, a six percent per annum penalty will be applied on any principal amount not paid within ninety days of the date that this Order is signed by the Regional Administrator.

F. Failure to comply with any requirement of this Order may subject Respondent to liability for a penalty of up to TWENTY-FIVE THOUSAND DOLLARS ($25,000) for each day of continued non-compliance with the terms of this Order. U.S. EPA is authorized to assess such penalties pursuant to RCRA Section 3008(c).

G. This Order constitutes a settlement and final disposition of the Complaint filed in this case and stipulations hereinbefore recited. Notwithstanding any other provision of this Order, an enforcement action may be brought pursuant to Section 7003 of RCRA or other statutory authority should U.S. EPA find that the handling, storage, treatment, transportation, or disposal of solid waste or hazardous waste at the facility may present an imminent and substantial endangerment to human health or the environment. U.S. EPA also expressly reserves the right to take any action necessary under Section 3008 of RCRA to enforce compliance with the applicable provisions of 35 Ill. Adm. Code Part 720 et seq., 40 CFR Parts 124 and 270, and this Order.

SIGNATORIES

Each undersigned representative of a party to this Consent Agreement and Final Order certifies that he or she is fully authorized to enter into the terms and conditions of this Consent Agreement and Final Order and to legally bind such party to this document, and hereby does so.

Agreed this 8/23/88 day of Aug, 1988.

By [signature] - Pres.
For
Respondent, Title

Agreed this 8th day of September, 1988.

By [signature]
Basil G. Constantelos, Director
Waste Management Division
U.S. Environmental Protection Agency
Region V, Complainant

The above being agreed and consented to, it is so ordered this 9th day of September, 1988.

[signature]
Valdas V. Adamkus
Regional Administrator
U.S. Environmental Protection Agency
Region V

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

AUG 0 5 1988

5CS-TUB-3

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mrs. Magdalene Allegretti
Amerdec, Inc.
90 Le Baron
Waukegan, Illinois 60085

Re: Consent Agreement and Final Order
Amerdec, Inc.
U.S. EPA I.D. No.: ILD 161 401 476

Dear Mrs. Allegretti:

I have enclosed herewith a Consent Agreement and Final Order (CAFO). It contains the same agreements that were in the draft CAFO you received on June 10, 1988, except for the penalty amount. As we discussed on July 22, 1988, the penalty has been significantly reduced to only $1,000 payable in two $500 installments. In response to a question you raised in your June 24, 1988, letter you may contact the Illinois Protection Agency (IEPA), Engineer on call at (217) 782-1696 for information on the permit application for a pre-treatment permit for any wastewater discharge from your treatment of the resinous waste. We will send you an IEPA closure plan application, under separate cover.

Please review the CAFO and, if acceptable, have the two originals signed by the appropriate party or parties within one week of your receipt of this letter and return them to me. The United States Environmental Protection Agency will sign both documents and return one to you. This Consent Agreement and Final Order shall become effective on the date it is signed by the Regional Administrator.

Sincerely,

Richard J. Clarizio
Assistant Regional Counsel

Enclosures

CONCURRENCES

SYMBOL	O.R	B.R	[illegible]	PER				
SURNAME	8/1/88	8/2/88	8/5/88	8-2-88				
DATE								

EPA Form 1320-1 (12-70)

OFFICIAL FILE COPY

*U.S. GPO : 1985-467-853

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

REPLY TO THE ATTENTION OF:

Regina King
Regional Hearing Clerk
U.S. EPA
230 South Dearborn
Chicago, Illinois 60604

Re: Amerdec, RCRA-V-W-R-018

Dear Ms. King:

The Complainant hereby submits the enclosed Status Report, Motion to Extend Time for Pre-Hearing Exchange and Motion to Amend the Complaint in the above case. Copies of this document proposed Order and the certificate of service have been provided to the the Honorable Frank W. Vanderheyden and Mrs. Magdalene Allegretti.

Sincerely,

Richard J. Clarizio
Assistant Regional Counsel

cc: Honorable Frank W. Vanderheyden
Mrs. Magdalene Allegretti

CERTIFICATE OF SERVICE

I, Richard J. Clarizio, hereby certify that I caused a copy of the foregoing Status Report, Motion to Extend Time for Pre-Hearing Exchange and Motion to Amend the Complaint and cover letter to be served upon the persons set forth below on this 3rd day of August, 1988, by causing said copies to be deposited in the U.S. Mail at 230 South Dearborn, Chicago, Illinios, 60604 with postage pre-paid and addressed to:

The Honorable Frank W. Vanderheyden
Environmental Protection Agency
401 M Street, S.W.
Mail Code A-110
Washington, D.C. 20460

Magdalene Allegretti
Amerdec, Inc.
90 Le Baron
Waukegon, Illinois 60085

I further certify that I caused the original of these documents to be filed on the date specified above, with the Regional Hearing Clerk, Regina King, U.S. EPA, Region V, 230 South Dearborn Street, Chicago, Illinois 60604.

by _____
Richard J. Clarizio
Assistant Regional Counsel
Counsel for Complainant

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION V

IN THE MATTER OF: AMERDEC, INC. RESPONDENT	))))	RCRA-V-W-R-018

STATUS REPORT, MOTION TO EXTEND TIME FOR PRE-HEARING EXCHANGE AND MOTION TO AMEND THE COMPLAINT

A. STATUS REPORT AND MOTION TO EXTEND TIME FOR PRE-HEARING EXCHANGE (MOTION)

The Complainant, through its undersigned attorney hereby files this Status Report and Motion. Respondent and Complainant, on July 18, 1988, verbally agreed to all outstanding issues in this matter, including the civil penalty. The Complainant is presently revising the draft Consent Agreement and Final Order (CAFO) to reflect the agreements. Complainant expects to send Respondent a final CAFO for review and signature during the week of August 8, 1988 and expects a fully executed CAFO by September 7, 1988. Consequently, Complainant respectfully moves this Court to extend the time for pre-hearing exchange of information to September 7, 1988.

B. MOTION TO AMEND COMPLAINT

Pursuant to 40 CFR 22.14(e), Complainant hereby, respectfully moves this Court to enter the attached Order revising portions of the Complaint to reflect: 1. additional information submitted by the Respondent on June 24 and July 8, 1988; 2. the draft CAFO; and 3. the revised penalty amount verbally agreed to by the Respondent and Complainant. The Complainant requests that the following sections of the Complaint be revised as specified:

I. FINDINGS OF VIOLATION

The following findings should be added after paragraph 14 in the Complaint:

15. In June 1988, Respondent applied to U.S. EPA for an U.S. EPA Hazardous Waste Identification Number. U.S. EPA assigned Amerdec the number ILD 161 401 476.

16. On June 24 and July 8, 1988, Respondent submitted photographs of the area where drums were previously stored and of the locked trucks where the Respondent asserted that the drums are now stored. Respondent also submitted copies of the following personal and corporate financial data for Amerdec and American Demineralizer for calendar years 1985, 1986 and 1987:

a. Corporate Federal Income Tax Returns for American Demineralizer for 1985, and for Amerdec for 1986;

b. Personal Income Tax Return for 1985;

c. 1987 deposit, sales and expense records of Amerdec;

d. Record of employee salaries paid in 1986 and corporate officer salaries in 1985, 1986 and 1987;

e. 1988 Illinois Corporate Annual Report;

f. 1987 Amerdec Industrial Real Estate Lease; and

g. 1988 listing of tangible assets, accounts payable and accounts receivable.

17. The corporate tax information shows sales for American Demineralizer and Amerdec as approximately $44,390 in 1985, $123,465 in 1986, and $47,731 in 1987. The losses shown for these businesses were approximately $11,410 in 1985, $4,575 in 1986 and $20,250 in 1987.

18. Amerdec received approximatley $15,000 and $8,000 in loans from the stockholders/corporate officers in 1986 and 1987, respectively. Amerdec also received approximately $14,000 in personal loans in 1987.

19. The corporate officers of Amerdec and American Demineralizer have not received any salaries or other apparent compensation from these companies in 1985, 1986 or 1987. The corporate officer did not file a 1986 or 1987 Federal personal income tax return since the amount of income received allegedly was less than that required to be reported by the Internal Revenue Service.

20. Current accounts payable and receivable for Amerdec are approximately $16,986 and $1,000 respectively. Amerdec's tangible assets are negligible and consist of two, ten-year-old trucks and a few pieces of heavy equipment/tools in excess of 30 years of age. Amerdec leases the property at 90 Le Baron Road for approximately $1,416 per month.

COMPLIANCE ORDER

Replace the "Compliance Order" portion of the Complaint with the following provisions:

1. Respondent shall, as of the effective date of this Order, achieve compliance with the standards applicable to generators of hazardous waste, except as provided below.

2. Respondent shall immediately, upon the effective date of this Order obtain an U.S. EPA hazardous waste identification number.

3. Respondent shall immediately upon the effective date of this order repackage the hazardous waste in containers that are in good condition, and are placed in a properly secured area as required in 35 Ill. Adm. Code 725.

4. Respondent shall within 45 days of the effective date of this Order remove all non-resinous waste in storage on-site to a permitted or interim status hazardous waste facility.

5. For the resinous waste contained on-site the Respondent shall complete the following activities:

a. within 15 days of the effective date of this Order submit to IEPA an acceptable pre-treatment permit application and any other required certifications for the effluent from the treatment of the resinous waste;

b. within 60 days of the effective date of this Order ensure that the equipment necessary to treat the waste is installed and operable;

c. within 15 days after IEPA's final decision on any pre-treatment permit either complete treatment of the resinous waste or arrange for its transport off-site to a permitted or interim status hazardous waste facility. Respondent must transport all hazardous waste residues from the treatment of the resinous waste to a permitted or interim status hazardous waste facility within 15 days after IEPA's approval of any pre-treatment permit.

6. Respondent shall, within 45 days of the effective date of this Order, sumit a closure plan for the hazardous waste storage facility. The plan shall be prepared by the firm which will provide the independent registered professional engineer who will certify closure and will meet the standards for such plans contained in 35 Ill. Adm. Code Part 725 and will describe the process which the Respondent proposes to use to treat the resinous waste contained on-site. IEPA

will approve disapprove or modify this plan.

7. Within thirty (30) days of approval or modification of the closure plan, Respondent shall complete closure of the facility in accordance with the approved closure plan and shall submit a certification of closure, as required by 35 Ill. Adm. Code 725.215.

8. Respondent shall within sixty (60) days of the effective date of this Order, provide U.S. EPA with a sworn statement of compliance with the terms of this Order signed by a duly authorized officer or director of Respondent's corporation. Included with the statement shall be a copy of the manifests used to transport the non-resinous wastes off-site and a copy of the closure plan referred to in paragraph 6 above.

9. The documents identified above shall be submitted to Mrs. Barbara Russell, U.S. EPA, Region V, Waste Management Division 5HS-12, 230 South Dearborn Street, Chicago, Illinois 60604, Attention: RCRA Enforcement Branch. A copy of these documents shall also be submitted to the IEPA.

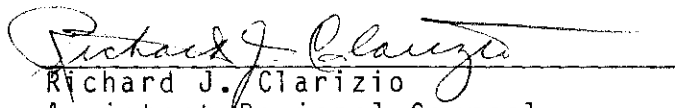
PROPOSED CIVIL PENALTY

Delete from the Complaint the reference to the proposed penalty of "FORTY-FIVE THOUSAND DOLLARS ($45,000)" and insert in its place the following "ONE THOUSAND DOLLARS ($1,000) payable in two FIVE HUNDRED DOLLAR ($500) installments. The first and second installments are due within thirty (30) days and one hundred and twenty (120) days, respectively, of the effective date of this Order."

In addition, add the following underlined phrase to the first complete sentence on page 10 of the Complaint:

> "Attachment 1 <u>and paragrphs 16-20 of the Findings of Violation Section of this Complaint</u> provide a detailed summary of the proposed civil penalty."

Respectfully submitted by:



Richard J. Clarizio
Assistant Regional Counsel
U.S. EPA, Region V

UNITED STATES ENVIRONEMENTAL PROTECTION AGENCY

IN THE MATTER OF:	)	
	)	DOCKET NO. V-W-88-R-018
AMERDEC INC.	)	
RESPONDENT	)	

ORDER

Pursuant to Complainant's Status Report and Motion to Extend Time I hereby Order that the Pre-Hearing Exchange of Information to be delayed until September 7, 1988. Also, I hereby Order the Complaint to be amended as requested by the Complainant in its Motion to Amend the Complaint (Motion). In particular, the Findings of Violation section of the Complaint is revised to include new paragraphs 16 through 20 contained in Complainant's Motion. The Order section of the Complaint is replaced with the language contained in Complainant's Motion. Finally, the penalty amount contained in the Proposed Penalty section is revised to ONE THOUSAND DOLLARS ($1,000) as specified in Complainant's Motion.

by _____
Frank W. Vanderheyden
Administrative Law Judge
U.S. EPA

Ordered this _____ day of _____, 1988.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

AUG 0 5 1988

REPLY TO THE ATTENTION OF:
5CS-TUB-3

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mrs. Magdalene Allegretti
Amerdec, Inc.
90 Le Baron
Waukegan, Illinois 60085

Re: Consent Agreement and Final Order
Amerdec, Inc.
U.S. EPA I.D. No.: ILD 161 401 476

Dear Mrs. Allegretti:

I have enclosed herewith a Consent Agreement and Final Order (CAFO). It contains the same agreements that were in the draft CAFO you received on June 10, 1988, except for the penalty amount. As we discussed on July 22, 1988, the penalty has been significantly reduced to only $1,000 payable in two $500 installments. In response to a question you raised in your June 24, 1988, letter you may contact the Illinois Protection Agency (IEPA), Engineer on call at (217) 782-1696 for information on the permit application for a pre-treatment permit for any wastewater discharge from your treatment of the resinous waste. We will send you an IEPA closure plan application, under separate cover.

Please review the CAFO and, if acceptable, have the two originals signed by the appropriate party or parties within one week of your receipt of this letter and return them to me. The United States Environmental Protection Agency will sign both documents and return one to you. This Consent Agreement and Final Order shall become effective on the date it is signed by the Regional Administrator.

Sincerely,

Richard J. Clarizio
Assistant Regional Counsel

Enclosures

CERTIFICATE OF SERVICE

I, Richard J. Clarizio, hereby certify that I caused a copy of the foregoing Status Report of Complaint and Motion for an Extension of Time to Complete Pre-Hearing Exchange of Information and cover letter to be served upon the persons set forth below on this 14th day of July, 1988, by causing said copies to be deposited in the U.S. Mail at 230 South Dearborn, Chicago, Illinios, 60604 with postage pre-paid and addressed to:

The Honorable Frank W. Vanderheyden
Environmental Protection Agency
401 M Street, S.W.
Mail Code A-110
Washington, D.C. 20460

Magdalene Allegretti
Amerdec, Inc.
90 Le Baron
Waukegon, Illinois 60085

I further certify that I caused the original of these documents to be filed on the date specified above, with the Regional Hearing Clerk, Regina King, U.S. EPA, Region V, 230 South Dearborn Street, Chicago, Illinois 60604.

by Richard J. Clarizio
Richard J. Clarizio
Assistant Regional Counsel
Counsel for Complainant

RECEIVED
JUN 28 1988
OFFICE OF REGIONAL COUNSEL
U.S. EPA REGION V

AMERDEC, INC
90 Le Baron
Waukegan, Il 60085
312 623 6650

June 24, 1988

Mr. Richard J. Clarizio
Asst. Regional Counsel
U.S. EPA
230 S. Dearborn St
Chicago, Il 60604

Dear Mr. Clarizio:

As you can determine, we have enclosed several pieces of information that you require.

Even though Mr. Allegretti was hospitalized, as you were informed, we have and are' making a concerted effort to comply with what is needed.

We have enclosed some pictures which will show you that there are no longer any drums on the ground, they are in the truck which is locked, pictures are enclosed.

There are 9 drums within the truck that contain the "dirt" that has to be hauled away. There are also the drums of ion exchange resin. The ion exchange resin will be retained for regeneration. These are reuseable and feel, for the most part, that they are in a regenerated state; these will be re-regenerated and if there is any sludge residue it will be hauled away as required; you will be kept advised as to when the regeneration will take place.

On the inside of the premises we have 5 drums of chromic acid which also has to be hauled away.

All of the drums are being prepared for the haulaway such as the required labelling, numbering and identification as much as possible. None of the drums are leaking, they have all been checked.

Envirite Corp is the company that has been contacted.

Mr. Allegretti will be out of town until July 2nd, the following week the activity on the haulaway should begin.

I believe that we have to have a Permit for the retention of our ion exchange resin and for their regeneration, I do not have an application for such a Permit, can one be sent?

I sincerely hope the above information will indicate to you that we are trying and want to resolve this problem.

Very truly yours,
Magdalene Allegretti
Magdalene Allegretti

10 JUN 1988

5C

CERTIFIED MAIL
RETRUN RECEIPT REQUESTED

Mr. Thomas Allegretti
Amerdec, Inc.
90 LeBaron
Waukegan, Illinois 60085

Dear Mr. Allegretti:

I am writing this letter to provide you with an opportunity to review, in writing, the steps the United States Environmental Protection Agency (USEPA) believes are necessary to settle the complaint that was issued against Amerdec and to summarize our May 27, 1988, discussions. Attached is a draft Compliance Agreement and Final Order (CAFO) which details the actions which Amerdec must take to resolve the allegations contained in the complaint. The dates negotiated in a CAFO must be specific and must be achieved. We cannot agree to deadlines which are contingent on the availability of money. Consequently, when reviewing this draft CAFO please pay particular attention to the dates specified in it. If you are interested in settling this complaint, please provide us with your comments on the draft CAFO by June 28, 1988.

As you stated in our call on May 27, 1988, we now look forward to receiving the completed USEPA identification number application and photos of the drums and trucks by June 3, 1988. As of today's date we have received the application and await the photos.

I realize that we presently disagree about the appropriateness of a penalty. The attached draft CAFO has reduced the penalty from $45,000 to $30,000 already, and the Agency's RCRA Civil Penalty Policy (copy attached) provides that additional reductions can be made in appropriate "financial hardship" cases. However, such additional reductions can only be made based on solid, reliable financial data. As I indicated during the call I cannot guarantee that we will further reduce the penalty amount but the following information will assist us in determining the appropriateness of any further reductions.

1. 1987 draft Amerdec tax return signed by the appropriate Amerdec officer;
2. Your 1986 and 1987 personal tax return;
3. An Amerdec balance sheet for the past two years which shows, at a minimum, the following:

   - salaries of officers and employees,
   - equipment and inventory on hand and their value,

- amount of money owed to Amerdec and the amount that Amerdec owes,
- copy of any agreements which show Amerdec's indebtedness,
- all assets and liabilities of Amerdec,
- present net worth of the corporation

You are under no obligation to submit the above information, but I believe that you agreed to submit it by June 10, 1988. As a result of discussions with Mrs. Allegretti on June 9, 1988, we understand that you will need additional time to provide this information. We now expect it by June 28, 1988. The more complete you are in the information the better we will be able to determine the appropriateness of the penalty.

If we receive all of the information discussed above by the dates specified we will review the information and contact you by July 6, 1988, with our analysis. If we do not receive the information by June 28, 1988, we will assume that you are not interested in settling this complaint. At that time we will advise the Administrative Law Judge that settlement negotiations have stalled and that we need his assistance in settling the complaint. If I can be of any assitance or if you have any questions please do not hesitate to contact me at 886-0559 or Ms. Russell at 353-7922.

Sincerely,

Richard J. Clarizio
Assistant Regional Counsel

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

REPLY TO THE ATTENTION OF:
5MF-4

Telephone (312) 353-1669

June 3, 1988

Honorable Gerald Harwood
Chief Adminstrative Law Judge
Office of Adminstrative Law
Judges (A-110)
U.S. Environmental Protection Agency
401 M. Street S.W.
Washington, D.C. 20460

RE: Amerdec, Inc.
RCRA-V-W-88-R-18

Dear Judge Harwood:

I am enclosing copies of the transmittal letter, complaint and Notice of Opportunity for Hearing, respondent's Answer to Complaint and Requesting for Hearing in the above-caption proceeding.

The respondents in the above-listed action have requested a hearing. Therefore, I am requesting that an Adminstrative Law Judge be assigned to conduct a hearing.

Please advise as to which Adminstrative Law judge will assigned to this case.

Sincerely

Regina King, Alternate
Regional Hearing Clerk

Enclosures

cc: Thomas Allegretti
Attorney for Respondent
Phone: (312) 623-6650

Richard Clarizio
Office of Regional Counsel
Phone: (312) 886-0559

MAY 25 1988

Mr. Thomas Allegretti
Amerdec, Inc.
90 LeBaron
Waukegan, Illinois 60085

Dear Mr. Allegretti:

I have taken the liberty of summarizing here the activities which we agreed to complete by May 27, 1988. U. S. EPA will inform you of its position on your proposed method of handling the resinous waste and on the penalty. We also look forward to receiving from you, as you agreed, by May 27, 1988, the following:

1. complete application for an EPA hazardous waste identification number.

2. pictures, signed and dated, that the waste containers are appropriately covered and that the truck has been locked.

If possible, we would also like to know the facility that you will send the waste to and the person(s) who will prepare the closure plan and the date you believe it will be completed. Please submit this information to Mrs. Russell. If you have any questions please feel free to contact either Mrs. Russell or me.

Sincerely,

Richard J. Clarizio
Assistant Regional Counsel

circle.

AMERDEC, INC

90 Le Baron
Waukegan, Il 60085
312 623 6650

RECEIVED
APR 28 1988
U.S. EPA, REGION V
WASTE MANAGEMENT DIVISION
OFFICE OF THE DIRECTOR

April 21, 1988

RECEIVED
MAY 09 1988
U.S. EPA, REGION V
WASTE MANAGEMENT DIVISION
OFFICE OF THE DIRECTOR

Mr. Basil G. Constantelos
Director
USEPA
230 S. Dearborn St
Chicago, Il 60604

5HS-12
Re: American Demineralizer Co
USEPA # ILD005167077
S.W.H. # 1852
Site # 03161603

Dear Sir:

Relative to your letter of April 15, 1988, please be advised of the following:

1. Amerdec, Inc has no involvement with the wastes in question. Those wastes were the result of the business done by American Demineralizer Company of which Mr. Allegretti was the owner.

2. Amerdec, Inc was incorporated in April of 1986.

3. American Demineralizer Company had the waste hauled to Waukegan in an American Demineralizer Company truck, it was on an expired permit. American Demineralizer Company had no money to have the waste disposed of properly as the company had ceased doing business in 1985. The company went broke; the only answer for me was to haul it to Waukegan until I could earn enough money to have it hauled away. Originally I intended to use it on an experimental basis for a hazaradous waste site clean up.

4. Amerdec, Inc does not function as did American Demineralizer Company. Amerdec, Inc designs and sells pollution prevention equipment only.

5. The waste, such as it is, is stored in plastic drums and there are no leaks. The ion exchange resins are not hazaradous waste and will eventually be used, hopefully.

6. If the resins cannot be used, they will be disposed of in accordance with the proper regulations.

7. It is anticipated that the remaining drums or waste will be sent to a disposal site within the next 30 days.

It would seem proper that an investigation by your personnel would be necessary before filing a Complaint rather than relying upon hear say evidence.

I will be available to answer any questions you might have.

I can be reached through Amerdec, Inc.

Very truly yours,

Thomas Allegretti

Thomas Allegretti

TA:ma

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

REPLY TO THE ATTENTION OF:
5HS-12

APR 15 1988

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Magdelene Allegretti, President
Amerdec, Inc.
90 LeBaron
Waukegan, Illinois 60085

Re: Complaint, Findings of Violation
and Compliance Order
Amerdec, Inc.
Non-notifier

Dear Ms. Allegretti:

Enclosed please find a Complaint, Findings of Violation and Compliance Order which specifies this Agency's determination of certain violations by Amerdec, Inc., of the Resource Conservation and Recovery Act (RCRA) as amended, 42 U.S.C. §6901 et seq. This Agency's determination is based on inspections of the facility located at 90 LeBaron, Waukegan, Illinois by the Illinois Environmental Protection Agency, and other information in our files. The Findings in the Complaint state the reasons for such a determination. In essence, the facility failed to meet particular requirements of RCRA relating to having a RCRA permit prior to the storage of hazardous wastes and improperly transporting hazardous waste.

Accompanying the Complaint is a Notice of Opportunity for Hearing. Should you desire to contest the Complaint, a written request for a hearing is required to be filed with Ms. Beverely Shorty, Regional Hearing Clerk (5MF-14), United States Environmental Protection Agency, 230 South Dearborn Street, Chicago, Illinois 60604, within 30 days from receipt of this Complaint. A copy of your request should also be sent to Richard Clarizio, Office of Regional Counsel (5CS-TUB-3), at the same address.

Regardless of whether you choose to request a hearing within the prescribed time limit following service of this Complaint, you are extended an opportunity to request an informal settlement conference.

If you have any questions or desire to request an informal conference for the purpose of settlement with Waste Management Division staff, please contact Barbara Russell, RCRA Enforcement Branch (5HS-12), United States Environmental Protection Agency, 230 South Dearborn Street, Chicago, Illinois 60604. Her phone number is (312) 353-7922.

Sincerely,

Basil G. Constantelos, Director
Waste Management Division

Enclosure

cc: Gary King, IEPA
Glenn Savage, IEPA
Harry Chappel, IEPA

bcc: Robert Small, OWPE (WH-527)
Richard Clarizio, ORC (5CS-TUB-3)
Denise Reape, SWB (5HS-13)
Regional Hearing Clerk (5MF-14)
Illinois Permit Unit, RPB (5HS-13)

4/11/88

INIT. DATE		BL 4/4/88		4-5-88	4/6/88	JMB 4/6/88	WEM 4/8/88	4/13/88

EP 4-13-88

Regardless of whether you choose to request a hearing within the prescribed time limit following service of this Complaint, you are extended an opportunity to request an informal settlement conference.

If you have any questions or desire to request an informal conference for the purpose of settlement with Waste Management Division staff, please contact Barbara Russell, RCRA Enforcement Branch (5HS-12), United States Environmental Protection Agency, 230 South Dearborn Street, Chicago, Illinois 60604. Her phone number is (312) 353-7922.

Sincerely,

Basil G. Constantelos, Director
Waste Management Division

Enclosure

cc: Gary King, IEPA
Glenn Savage, IEPA
Harry Chappel, IEPA

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

V-W- 88 R-018

IN THE MATTER OF:	)	DOCKET NO.
	)	
AMERDEC, INC. 90 LEBARON WAUKEGAN, ILLINOIS 60085	)	COMPLAINT, FINDINGS OF VIOLATION AND COMPLIANCE ORDER
	)	
NON-NOTIFIER	)	

V-W- 88 R-018

APR 14 1988

REGIONAL HEARING CLERK
U.S. ENVIRONMENTAL PROTECTION AGENCY

This Complaint is filed pursuant to Section 3008(a)(1) of the Resource Conservation and Recovery Act of 1976 as amended (RCRA), 42 U.S.C. §6928(a)(1), and the United States Environmental Protection Agency's Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation or Suspension of Permits, 40 CFR Part 22. The Complainant is the Director, Waste Management Division, Region V, United States Environmental Protection Agency (U.S. EPA). The Respondent is Amerdec, Inc., 90 LeBaron, Waukegan, Illinois 60085.

This Complaint is based on information obtained by the U.S. EPA, including compliance inspections conducted by the Illinois Environmental Protection Agency (IEPA) on January 29, 1987, and February 18, 1987. At the time of the inspections, violations of applicable State and Federal regulations were identified.

Pursuant to 42 U.S.C. §6928(a)(1), and based on the information cited above, it has been determined that Amerdec, Inc. has violated 35 Ill. Adm. Code 703.121, 723.111, 723.112, 723.120(a), 724.111, 724.113(a) and (b), 724.114(a), (b), and (c), 724.115(a), (b), and (d), 724.131, 724.135, 724.137, 724.151(a), 724.153, 724.173, 724.175, 724.176, 724.212(a), 724.242(a), 724.271, 724.273(a), and 724.274.

JURISDICTION

Jurisdiction for this action is conferred upon U.S. EPA by Sections 2002(a)(1), 3006(b), and 3008 of RCRA, 42 U.S.C. §6912(a)(1), §6926(b), and §6928, respectively.

On January 30, 1986, the State of Illinois was granted final authorization by the Administrator of U.S. EPA pursuant to Section 3006(b) of RCRA, 42 U.S.C. §6926(b), to administer a hazardous waste program in lieu of the Federal program. See 51 Federal Register 3778 (1986). As a result, facilities in Illinois qualifying for interim status under 40 CFR 270.70 are regulated under the Illinois provisions found at 35 Ill. Adm. Code Part 720 et seq., rather than the Federal regulations set forth at 40 CFR Part 265. Section 3008 of RCRA, 42 U.S.C. §6928, provides that U.S. EPA may enforce State regulations in those States authorized to administer a hazardous waste program. Notice to IEPA pursuant to this section was provided by U.S. EPA on August 26, 1987.

FINDINGS OF VIOLATION

This determination of violation is based on the following:

1. Respondent, Amerdec, Inc., is a person defined by Section 1004(15) of RCRA, 42 U.S.C. §6903(15), and 35 Ill. Adm. Code 702.110, which owns and operates a facility at 90 LeBaron, Waukegan, Illinois 60085 that stores hazardous waste.

2. Section 3010(a) of RCRA, 42 U.S.C. §6930(a), requires any person who generates or transports hazardous waste, or owns or operates a facility for the treatment, storage, or disposal of hazardous waste, to notify U.S. EPA of such activity within 90 days of the promulgation of regulations under Section 3001 of RCRA. Section 3010 of RCRA also provides that no hazardous waste subject to regulations may be transported, treated, stored or disposed unless the required notification has been given.

3. U.S. EPA first published regulations concerning the generation, transportation, treatment, storage or disposal of hazardous waste on May 19, 1980. These regulations are codified at 40 CFR Parts 260 through 265. Notification to U.S. EPA of hazardous waste activity was required in most instances no later than August 18, 1980.

4. Section 3005(a) of RCRA requires U.S. EPA to publish regulations requiring each person owning or operating a hazardous waste treatment, storage, or disposal facility to obtain a RCRA Permit. Such regulations were published on May 19, 1980, and are codified at 40 CFR Parts 270 and 271 (formerly Parts 122 and 123). The regulations require that persons who treat, store, or dispose of hazardous waste submit Part A of the permit application in most instances no later than November 19, 1980.

5. Section 3005(e) of RCRA provides that an owner or operator of a facility shall be treated as having been issued a permit pending final administrative disposition on the permit application provided that: (1) the facility was in existence on November 19, 1980; (2) the requirements of Section 3010(a) of RCRA concerning notification of hazardous waste activity have been complied

with; and (3) an application for a permit has been made. This statutory authority to operate is known as interim status. U.S. EPA regulations implementing these provisions are found at 40 CFR Part 270.

6. The Respondent was not in existence on November 18, 1980, therefore, the Respondent is not eligible to obtain interim status.

7. The Respondent failed to submit Part A and B of the Permit Application and receive a final RCRA permit prior to storing hazardous waste at its facility as required by Section 3005(a) of RCRA and to meet the standards for owner(s) and operators of hazardous waste treatment, storage, and disposal facilities contained in 40 CFR Part 264 and 35 IAC Part 724.

8. The Respondent Amerdec Inc., stored spent chrome plating solutions, index filter waste, and spent resins which are hazardous waste because they either exhibit the characteristic of corrosivity (D002), EP toxicity (D007 or D008) or were sludges from electroplating operations (F006) under Section 3001 of the Act, 40 CFR 261.31 and 35 IAC 721.131.

9. On January 29, 1987, Mr. Thomas Allegretti, Manager of Amerdec, Inc. informed Mr. John Maher, Inspector, Illinois Environmental Protection Agency (IEPA) that in November of 1986, Amerdec transported 7 barrels of the above wastes from 4425 W. Montrose, Chicago, Illinois to Amerdec's present location at 90 LeBaron, Waukegan, Illinois. Furthermore, he informed Mr. Maher that Amerdec did not have the necessary records and plans discussed below in paragraph 10.

10. On January 29, 1987, and February 18, 1987, the IEPA conducted RCRA inspections of Respondent's facility and observed the following violations on the dates parenthetically noted below:

a. Failure to obtain a RCRA Permit prior to storing on its property 11 barrels of hazardous waste, as required by 35 Ill. Adm. Code 703.121; (January 29, 1987), (February 18, 1987);

b. Failure to obtain a U.S. EPA identification number prior to transporting hazardous waste, as required by 35 Ill. Adm. Code 723.111; (January 29, 1987), (February 18, 1987);

c. Failure to store transported hazardous waste less than 10 days. Failure to store hazardous waste in containers that meet the packaging requirements of 722.130, as required by 35 Ill. Adm. Code 723.112; (January 29, 1987), (February 18, 1987);

d. Failure to obtain a signed manifest prior to accepting hazardous waste from a generator, as required by 35 Ill. Adm. Code 723.120(a); (January 29, 1987), (February 18, 1987);

e. Failure to obtain a U.S. EPA identification number prior to storing hazardous waste, as required by 35 Ill. Adm. Code 724.111; (January 29, 1987), (February 18, 1987);

f. Failure to obtain a detailed chemical and physical analysis of a representative sample of hazardous waste prior to storage, and failure to have a detailed written waste analysis plan on file, as required by 35 Ill. Adm. Code 724.113(a) and (b); (January 29, 1987), (February 18, 1987);

g. Failure to prevent unknowing entry and to minimize the possibility for the unauthorized entry onto the active portion of the facility. Failure to provide 24-hour surveillance or a means to control unauthorized entry into the active portion of the facility. Failure to post a "Danger-

Unauthorized Personnel Keep Out" sign at each entrance, as required by 35 Ill. Adm. Code 724.114(a), (b), and (c); (January 29, 1987), (February 18, 1987);

h. Failure to inspect the facility for malfunction and deterioration, operator errors and discharges; failure to develop and follow a written inspection schedule; and failure to record inspections in an inspection log or summary, as required by 35 Ill. Adm. Code 724.115(a), (b), and (d); (January 29, 1987), (February 18, 1987);

i. Failure to maintain the facility to minimize hazardous situations affecting the environment or human health, as required by 35 Ill. Adm. Code 724.131; (January 29, 1987), (February 18, 1987);

j. Failure to maintain aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment and decontamination equipment to any area of facility operation in an emergency, as required by 35 Ill. Adm. Code 724.135; (January 29, 1987), (February 18, 1987);

k. Failure to familiarize local authorities with hazardous aspects of the facility, as required by 35 Ill. Adm. Code 724.137; (January 29, 1987), (February 18, 1987);

l. Failure to have a contingency plan on file as required by 35 Ill. Adm. Code 724.151(a) (January 29, 1987), (February 18, 1987);

m. Failure to provide copies of the contingency plan to all organizations that may be called upon to provide emergency service; as required by 35 Ill. Adm. Code 724.153; (January 29, 1987), (February 18, 1987);

n. Failure to keep a written operating record at the facility, as required by Ill. Adm. Code 724.173; (January 29, 1987), (February 18, 1987);

o. Failure to submit a copy of an annual report to the Agency by March 1, for year 1986, as required by Ill. Adm. Code 724.175; (January 29, 1987), (February 18, 1987);

p. Failure to submit an unmanifested waste report to the Agency within 15 days after receiving waste, as required by Ill. Adm. Code 724.176; (January 29, 1987), (February 18, 1987);

q. Failure to have a written closure plan, as required by Ill. Adm. Code 724.212(a); (January 29, 1987), (February 18, 1987);

r. Failure to have a written estimate in current dollars of the cost of closing the facility, as required by Ill. Adm. Code 724.242(a); (January 29, 1987), (February 18, 1987);

s. Failure to maintain containers in good condition, as required by Ill. Adm. Code 724.271; (January 29, 1987), (February 18, 1987);

t. Failure to store containers closed and upright during storage, as required by Ill. Adm. Code 724.273(a); (January 29, 1987), (February 18, 1987);

u. Failure to conduct weekly inspections of containers, as required by Ill. Adm. Code 724.274; (January 29, 1987), (February 18, 1987);

11. On April 13, 1987, the IEPA sent the Respondent a Pre-Enforcement Conference Letter citing the violations observed during the January 29, and February 18, 1987, inspections. The letter also scheduled a Pre-Enforcement Conference for April 23, 1987.

12. The Pre-Enforcement Conference was held on May 4, 1987. Since an Agreement was not reached, Respondent agreed to resume discussions on May 11, 1987. Respondent failed to appear for the meeting as scheduled.

13. On July 28, 1987, the IEPA referred the matter to the U.S. EPA for formal enforcement action.

14. This enforcement action and resultant penalty are based on violations of 35 Ill. Adm. Code Parts 703, 723, and 724.

COMPLIANCE ORDER

Respondent having been initially determined to be in violation of the above cited rules and regulations, the following Compliance Order pursuant to Section 3008 of RCRA, 42 U.S.C. §6928, is entered:

A. Respondent shall, immediately upon this Order becoming final, cease all treatment, storage or disposal of any hazardous waste except as provided for in Paragraphs B and C below.

B. Respondent shall immediately repackage hazardous waste into containers that are in good condition and store containers in a properly secured area.

C. Respondent shall, within thirty (30) days of this Order becoming final, achieve compliance with the following requirements.

1. Submit to IEPA a closure plan for the storage facility. The plan shall be prepared in accordance with the standards for such plans contained in 35 Ill. Adm. Code Part 724, and shall detail the activities to be accomplished by the Respondent to remove and

properly dispose of all hazardous waste at the facility. IEPA will approve, disapprove, or modify this plan.

2. Within 30 days of IEPA approval or modification of the closure plan, Respondent shall complete closure of the facility, in accordance with the approved closure plan and shall submit a certification of closure, as required by 35 Ill. Adm. Code 724.215.

D. Respondent shall notify U.S. EPA in writing upon achieving compliance with this Order and any part thereof. This notification shall be submitted no later than the time stipulated above to the Waste Management Division, U.S. EPA, Region V, 230 South Dearborn Street, Chicago, Illinois 60604, Attention: Barbara Russell, RCRA Enforcement Branch (5HS-12).

A copy of these documents and all correspondence with U.S. EPA regarding this Order shall also be submitted to Gary King, Senior Attorney, Division of Enforcement Services, Illinois Environmental Protection Agency, 2200 Churchill Road, P.O. Box 19276, Springfield, Illinois 62974-9276

Notwithstanding any other provision of this Order, an enforcement action may be brought pursuant to Section 7003 of RCRA or other statutory authority where the handling, storage, treatment, transportation, or disposal of solid or hazardous waste at this facility may present an imminent and substantial endangerment to human health or the environment.

PROPOSED CIVIL PENALTY

In view of the above determination and in consideration of the seriousness of the violations cited herein, the potential harm to human health and the environment, the continuing nature of the violations, and the ability of

the Respondent to pay penalties, the Complainant proposes to assess a civil penalty in the amount of FORTY-FIVE THOUSAND DOLLARS ($45,000) against the Respondent, Amerdec, Inc., pursuant to Sections 3008(c) and 3008(g) of RCRA, 42 U.S.C. §6928. Attachment 1 to the Complaint provides a detailed summary of the proposed civil penalty. Payment shall be made by certified or cashier's check payable to the Treasurer of the United States of America and shall be mailed to U.S. EPA, Region V, P.O. Box 70753, Chicago, Illinois 60673. Copies of the transmittal of the payment should be sent to both the Regional Hearing Clerk (5MF-14), Planning and Management Division, and the Solid Waste and Emergency Response Branch Secretary (5CS-TUB-3), Office of Regional Counsel, U.S. EPA, 230 South Dearborn Street, Chicago, Illinois 60604.

Failure to comply with any requirements of the Order shall subject the above-named Respondent to liability for a civil penalty of up to TWENTY-FIVE THOUSAND DOLLARS ($25,000) for each day of continued noncompliance with the deadlines contained in this Order. U.S. EPA is authorized to assess such penalties pursuant to RCRA Section 3008(c).

The U.S. EPA may collect interest on any amount overdue under the terms of this Order at the rate established by the Secretary of The Treasury pursuant to 31 U.S.C. §3717. A late payment handling charge of $20.00 will be imposed after thirty (30) days, with an additional charge of $10.00 or for each subsequent 30-day period over which an unpaid balance remains. In addition, a six percent per annum penalty will be applied on any principal amount not paid within ninety (90) days of the date on which each payment is due.

NOTICE OF OPPORTUNITY FOR HEARING

The above-named Respondent has the right to request a hearing to contest any material factual allegation set forth in the Complaint and Compliance Order or the appropriateness of any proposed compliance schedule or penalty. Unless said Respondent has filed an answer not later than thirty (30) days from the date this Complaint is served, Respondent may be found in default of the above Complaint and Compliance Order.

To avoid a finding of default by the Regional Administrator, Respondent must file a written answer to this Complaint with the Regional Hearing Clerk (5MF-14), Planning and Management Division, U.S. EPA, Region V, 230 South Dearborn Street, Chicago, Illinois 60604, within thirty (30) days of receipt of this notice. A copy of Respondent's answer and any subsequent documents filed in this action should be sent to Richard Clarizio, Assistant Regional Counsel (5CS-TUB-3), Office of Regional Counsel, U.S. EPA, Region V, 230 South Dearborn Street, Chicago, Illinois 60604. Failure to answer within thirty days of receipt of this Complaint may result in a finding by the Regional Administrator that the entire amount of penalty sought in the Complaint is due and payable and subject to the interest and penalty provisions contained in the Federal Claims Collection Act of 1966, 31 U.S.C. §3701 et seq.

Respondent's answer should clearly and directly admit, deny, or explain each of the factual allegations of which Respondent has knowledge. Said answer should contain (1) a definite statement of the facts which constitute the grounds of defense, and (2) a concise statement of the facts which Respondent intends to place at issue in the hearing. The denial of any material fact, or the raising of any affirmative defense, shall be construed as a request for a hearing.

The Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation or Suspension of Permits, 40 CFR Part 22, are applicable to this administrative action.

SETTLEMENT CONFERENCE

Whether or not Respondent requests a hearing, Respondent may confer informally with U.S. EPA concerning: (1) whether the alleged violations in fact occurred as set forth above; (2) the appropriateness of the compliance schedule; and (3) the appropriateness of any proposed penalty in relation to the size of Respondent's business, the gravity of the violations, and the effect of the proposed penalty on Respondent's ability to continue in business. Respondent may request an informal settlement conference at any time by contacting this office. Any such request, however, will not affect either the thirty-day time limit for responding to this Complaint or the thirty-day time limit for requesting a formal hearing on the violations alleged herein.

U.S. EPA encourages all parties to pursue the possibilities of settlement through informal conferences. A request for an informal conference should be made in writing to Barbara Russell, RCRA Enforcement Branch (5HS-12), U.S. Environmental Protection Agency, 230 South Dearborn Street, Chicago, Illinois 60604, or by calling her at (312) 353-7922.

Dated this 13th day of April, 1988.

Basil G. Constantelos, Director
Waste Management Division
Complainant
U.S. Environmental Protection Agency
Region V

CERTIFICATE OF SERVICE

I hereby certify that I have caused a copy of the foregoing Complaint to be served upon the persons designated below, on the date below, by causing said copies to be deposited in the U.S. Mail, First Class and certified-return receipt requested, postage prepaid, at Chicago, Illinois, in envelopes addressed to:

Magdelene Allegretti, President
Amerdec, Inc.
90 LeBaron
Waukegan, Illinois 60085

I have further caused the original of the Complaint and this Certificate of Service to be served in the Office of the Regional Hearing Clerk located in the Planning and Management Division, U.S. EPA, Region V, 230 South Dearborn Street, Chicago, Illinois 60604, on the date below.

These are said persons' last address known to the subscriber.

Dated this 15 day of April, 1988.

Jean M. Sharp for
Secretary, Office of RCRA
U.S. EPA, Region V

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

5HE-12

26 AUG 1987

William Child, Manager
Division of Land Pollution Control
Illinois Environmental Protection Agency
2200 Churchill Road
Springfield, Illinois 62706

Re: RCRA 3008(a)(2) Notice
Amerdec, Inc.
Waukegan, Illinois
EPA I.D. No.: Non-notifier

Dear Mr. Child:

Pursuant to Section 3008(a)(2) of the Resource Conservation and Recovery Act (RCRA) as amended, I am providing notice to you that the United States Environmental Protection Agency is preparing to issue an Order under Section 3008(a)(1) to the subject facility for the transporter and storage violations outlined in your Agency's referral of July 28, 1987.

If you have any questions on this matter, please contact Barbara Russell of my staff at (312) 353-7922.

Sincerely yours,

ORIGINAL SIGNED BY
WILLIAM H. MINER

William H. Miner, Chief
Hazardous Waste Enforcement Branch

cc: Gary King, IEPA
Glenn Savage, IEPA
Harry Chappel, IEPA
Tom Cavanagh, IEPA

bcc: Mary Murphy, GMU (5HS-13)
Ronald Brown, Acting Chief, EPU #1

CONCURRENCES

U.S. EPA:WMD:HWEB:RES:EPU #1:BRUSSELL:353-7922:o.robinson:8/24/87:disk 2

SYMBOL	EPU #1	EPU	EPU #1	Acting Chief			
SURNAME	O.R	Russell	NEB	RES			
DATE	8/24/87	8/24/87	8-24-87	JMB/8-24-87	8/25		

EPA Form 1320-1 (12-70)

OFFICIAL FILE CO

*U.S. GPO : 1984-

Illinois Environmental Protection Agency · P.O. Box 19276, Springfield, IL 62794-9276

(217)782-5544

Refer to: 0971900034-Lake County
Waukegan/Amerdec
No ILD number
Enforcement File

RECEIVED
AUG 03 1987
U.S. EPA, REGION V
WASTE MANAGEMENT DIVISION
OFFICE OF THE DIRECTOR

Request for Compliance Order

July 28, 1987

Basil Constantelos
Waste Management Division
U.S. Environmental Protection Agency
Region V
230 South Dearborn Street
Chicago, IL 60604

Dear Mr. Constantelos:

The Agency hereby refers to USEPA Region V violations of RCRA regulations at the above facility. A description of the facility as well as the violations existing at the facility are set forth in the attachments to this letter.

The parties operating the Amerdec facility also operated a facility called American Demineralizer Company which was located at 4425 W. Montrose, Chicago, Illinois. That facility was referred to USEPA on August 14, 1984. Please refer to that file for information concerning the operators site operations.

Paul Jagiello is the Illinois EPA attorney assigned to this matter. Please notify him of the technical and legal staff assigned to this matter. Please inform Paul Jagiello of the date on which the compliance order is issued and copy him on all documents in this matter.

Sincerely,

Gary P. King

Gary P. King
Senior Attorney
Enforcement Programs
Division of Land Pollution Control

GK:tdd
cc: Bill Muno, USEPA (w/out att.)
John Maher (w/out att.)
Northern Region (Cliff Gould)(w/out att.)
Michelle Tebrugge (w/out att.)
DLPC Div. File (w/out att.)
Docket Control (Linda Cooper)(w/out att.)
Paul Jagiello (w/out att.)

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY MEMORANDUM

DATE: May 20, 1987

TO: EDG - Gary King

FROM: John Maher

SUBJECT: Referral for appropriate action.
0971900034 - Lake
Waukegan/Amerdec, Inc.
Non-notifier
Enforcement File

The subject site sells ion exchange equipment used by industries that use water in their manufacturing operations. This equipment includes ion exchange columns and paper filters. This company at the subject site only provides the equipment; they do not take back the spent filters from their customers. Therefore, this site's current business activities do not generate any hazardous waste or non-hazardous special waste. However, this company used to be called American Demineralizer and was located in Chicago (4425 W. Montrose). When operating under this name this company did take back the spent ion exchange filters from their customers, many of whom were electroplaters. American Demineralizer regenerated the resins in the columns by first back flushing the columns to remove the heavy "dirt", and then treating the resins with acids and caustics to remove the contaminants. The regeneration process generated primarily two waste streams: 1) an index filter waste collected from the back flushing activity, and 2) the acid and caustic waste water that was discharged to the sanitary sewer. The index filter waste was placed in drums throughout the facility, including outside the building. Some time in 1985, American Demineralizer went out of business. On April 23, 1986, Amerdec, Inc. was formed. (It was and is operated by the same individuals who operated American Demineralizer.) In November of 1986, Amerdec moved to their present location (the subject of this memo). They brought some drums (approximately seven (7)) of the index filter waste with them to their new location. Since the contaminants removed from the resins in the columns collectively are a wastewater treatment sludge (F006), and these contaminants were collected on the index filters, the subject site is a hazardous waste storage facility as a consequence of receiving the index filter waste from off-site.

On January 29, 1987 (and continued on February 18, 1987), I inspected the subject facility for compliance with the hazardous waste regulations. During that inspection the following violations were observed:

Waukegan

703.121 - Conducting hazardous waste storage without interim status or a RCRA permit.
723.111 - No USEPA identification number.
723.112 - Transported waste has been stored over ten days at the site and in containers that do not meet the packaging requirements of 722.130.
723.120 - Waste was accepted from the generator without a manifest.
724.111 - No USEPA identification number.
724.113 - No waste analyses and no waste analysis plan.

724.114 - Waste storage area is not secure from unauthorized entry and a sign with the legend "Danger - Unauthorized Personnel Keep Out" is not posted near the storage area.
724.115 - Inspections of the facility are not conducted, no inspection schedule and no inspection log.
724.131 - Facility is not maintained to minimize hazardous situations affecting the environment or human health; specifically, drums of waste are being stored without tops.
724.135 - Inadequate aisle space.
724.137 - Arrangements have not been made with local authorities regarding emergency assistance.
724.151 - No contingency plan.
724.153 - No contingency plan sent to local emergency organizations.
724.173 - No operating record.
724.175 - Facility Annual Report has not been submitted to the Agency.
724.176 - Unmanifested waste report has not been submitted to the Agency.
724.212 - No closure plan.
724.242 - No closure cost estimate.
724.271 - Container X208 of hazardous waste was leaking.
724.273 - Several containers were being stored open.
724.274 - Inspections of containers are not conducted.

On February 6, 1987, Caroline Panico and I sampled eleven (11) of the drums that were being stored behind the subject site's building. The results of the analyses of these samples show all of the index filter waste samples contained cyanide and one of the samples contained an E.P. Toxic concentration of cadmium. All of the samples of liquid waste (spent chrome solution) showed concentrations of chromium well above the E.P. Toxic limit. One of the samples showed an E.P. Toxic concentration of lead equal to the lower limit for E.P. Toxicity (i.e., 5.00 mg/l). The presence of cyanide reaffirms my belief that this waste is wastewater treatment sludge from electroplating operations (F006), regardless of its indirect generation via Amerdec's regeneration process.

On April 13, 1987, a PECL (in lieu of a CIL) was sent to the subject facility identifying the above-mentioned violations.

On May 4, 1987, the pre-enforcement conference was held. During this conference, much was discussed with Mr. Allegretti of Amerdec, but little was accomplished (in part due to Mr. Allegretti's disagreement with us that the index filter waste is hazardous waste). We agreed to resume our discussion on May 11, 1987. Mr. Allegretti did not show up for the meeting.

Amerdec appears to lack interest in cooperating and discussing this matter with the Agency. The individuals involved with this site have a history of operating their site out of compliance with the regulations and disinterest in cooperating with the Agency. Based on the above, I am referring this matter to EDG to decide on appropriate action to be taken. I recommend that enforcement action be taken.

cc: Division File
Northern Region
Glenn Savage
Don Gimbel

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY MEMORANDUM

DATE: April 27, 1987

TO: Division File

FROM: John Maher

SUBJECT: Pre-enforcement Conference.
0316160003 - Cook
Chicago/C & C Roofing Co.
ILD005167077
Compliance File

On April 23, 1987 at 11:00 a.m., a pre-enforcement conference was held at the Northern Region office with the subject facility. In attendance were: Joseph Cholewa, Sr. of C & C Roofing Co.; Robert Prorak, attorney for C & C Roofing Co.; and Cliff Gould and John Maher of IEPA/DLPC.

Mr. Prorak argued that the regulations are in violation of State real estate laws, because the regulations do not require that the previous owner provide notice in the property title that the site is subject to IEPA regulations. Since we are not attorneys, Cliff and I refrained from debating the issue, other than stating that our position remains that C & C Roofing Co. is subject to the hazardous waste regulations.

At Mr. Prorak's suggestion, C & C Roofing Co. will be included in the pre-enforcement conference with Amerdec, Inc. in order to clarify some aspects of the ownership and operator changes. The conference is scheduled for May 4, 1987 at 2:00 p.m.

Cliff made Mr. Cholewa and Mr. Prorak aware that the regulations in Part 725 identify all the items required in a closure plan. Before the conference was over, I gave Mr. Prorak a copy of the new edition of the hazardous waste regulations.

cc: Northern Region
Michelle Tebrugge
Amerdec, Inc. File (0971900034)

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

217/782-6761

Refer to: 0971900034 -- Lake County
Waukegan/Amerdec, Inc.
Non-notifier
Compliance File

PRE-ENFORCEMENT CONFERENCE LETTER

Certified #

April 13, 1987

Amerdec, Inc.
Attn: Thomas Allegretti
90 LeBaron
Waukegan, Illinois 60085

Dear Mr. Allegretti:

By copy of this letter the Agency hereby informs Amerdec, Inc. of apparent violations of the Illinois Environmental Protection Act and/or rules and regulations adopted thereunder. These apparent violations are set forth in Attachment A of this letter.

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

Prior to taking such action, however, you are requested to attend a Pre-Enforcement Conference to be held at Division of Land Pollution Control, 1701 South First Avenue, Suite 600, Maywood, Illinois 60153. The purpose of this Conference will be:

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

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

You should, therefore, bring such personnel and records to the conference as will enable a complete discussion of the above items. We have scheduled the Conference for April 23, 1987, at 2:00 p.m. If this arrangement is inconvenient, please contact Cliff Gould at 312/345-9780 to arrange for an alternative date and time.

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

Sincerely,

Harry A. Chappel, P.E., Manager
Compliance Monitoring Section
Division of Land Pollution Control

HAC:MT:rmi/2137g/44-45

Attachment

cc: Division File
Northern Region
Don Gimbel
John Maher
Michelle Tebrugge

Attachment A

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

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

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

You are in apparent violation of 35 Ill. Adm. Code 703.121(a) for the following reason(s): You are conducting a hazardous waste storage facility without interim status or a RCRA permit.

Pursuant to 35 Ill. Adm. Code 723.111, a transporter must not transport hazardous waste without having received a USEPA identification number from the Administrator. In November of 1986 you transported hazardous waste without receiving the required USEPA identification number in apparent violation of 35 Ill. Adm. Code 723.111.

Pursuant to 35 Ill. Adm. Code 723.112, a transporter who stores manifested shipments of hazardous waste in containers meeting the requirements of Section 722.130 at a transfer facility for a period of ten days or less is not subject to regulations under Parts 724 and 725 and 40 CFR Part 122 with respect to the storage of those wastes. On the date of the inspection hazardous waste had been stored greater than ten days subjecting your facility to regulation under Parts 724, 725 and 40 CFR Part 122.

Pursuant to 35 Ill. Adm. Code 723.120(a), a transporter may not accept hazardous waste from a generator unless it is accompanied by a manifest, signed by the generator in accordance with the provisions of Part 722. You are in apparent violation in that in November of 1986 you transported hazardous waste from your former location at 4425 W. Montrose, Chicago without obtaining the required manifest.

Pursuant to 35 Ill. Adm. Code 724.111, every facility owner or operator must apply to USEPA for a USEPA identification number in accordance with the USEPA notification procedures (45 FR 12746). You are in apparent violation of this Section in that you have not applied for a USEPA identification number for your facility.

Pursuant to 35 Ill. Adm. Code 724.112(c), before the owner or operator transfers the ownership or operation of a facility he must notify in writing the new owner or operator of the requirements of 35 Ill. Adm. Code 724 and 40 CFR Part 122. You are in apparent violation of 35 Ill. Adm. Code 724.112(c) for the following reason(s): You failed to notify the new operator of these requirements in writing.

Pursuant to 35 Ill. Adm. Code 724.113(a), the owner or operator is required to conduct a detailed chemical and physical analysis of a representative sample of hazardous waste prior to storage of that waste. You are in apparent violation of 35 Ill. Adm. Code 724.113(a) for the following reason(s): You have not conducted any waste analyses for the hazardous wastes you have in storage.

Pursuant to 35 Ill. Adm. Code 724.113(b), the owner or operator must develop and follow a written waste analysis plan which describes the procedures which he will carry out to comply with paragraph (a). He must keep this plan at the facility. At a minimum, the plan must specify:

1. The parameters for which each hazardous waste will be analyzed and the rationale for the selection of these parameters (i.e., how analysis for these parameters will provide sufficient information on the waste's properties to comply with paragraph (a).

2. The test methods which will be used to test for these parameters;

3. The sampling method which will be used to obtain a representative sample of the waste to be analyzed. A representative sample may be obtained using either:

   A. One of the sampling methods described in 35 Ill. Adm. Code 721 Appendix A or

   B. An equivalent sampling method.

   (Board Note: See 35 Ill. Adm. Code 720.120(c) for related discussion.)

4. The frequency with which the initial analysis of the waste will be reviewed or repeated to ensure that the analysis is accurate and up-to-date;

5. For off-site facilities, the waste analyses that hazardous waste generators have agreed to supply; and

6. Where applicable, the methods which will be used to meet the additional waste analysis requirements for specific waste management methods as specified in Section 724.293, 724.325, 724.352, 724.373, 724.414, 724.445, 724.475 and 724.502.

You are in apparent violation of 35 Ill. Adm. Code for the following reason(s): You do not have a waste analysis plan.

Pursuant to 35 Ill. Adm. Code 724.114(a)/(b), the owner or operator must prevent unknowing entry and minimize the possibility for the unauthorized entry of persons or livestock onto the active portions of a facility by providing 24-hour surveillance or a means to control entry using an artificial or natural barrier and controlled access points. You are in apparent violation of 724.114(a)/(b) for the following reason(s): Your waste storage area is not secure from unauthorized entry.

Pursuant to 35 Ill. Adm. Code 724.114(c), the owner or operator must post a sign with the legend "Danger-Unauthorized Personnel Keep Out" at each entrance to the active portion of the facility and at other locations which can be seen from any approach to this active portion. At the time of the inspection, a sign with the above-mentioned legend was not posted which is in apparent violation of this Section.

Pursuant to 35 Ill. Adm. Code 724.115(a), the owner or operator must inspect his facility for malfunctions and deterioration, operator errors and discharges that may be causing or may lead to a release to the environment or a threat to human health. You are in apparent violation of 35 Ill. Adm. Code 724.115(a) in that the required inspections are not being made.

Pursuant to 35 Ill. Adm. Code 724.115(b), the owner or operator must develop and follow a written schedule for inspection of all equipment and devices that are important to preventing, detecting or responding to environmental or human health hazards. This schedule must be kept at the facility and must identify the types of problems which are to be looked for during the inspection. The schedule must allow for daily inspection of areas subject to spills, when those areas are in use. You are in apparent violation of 35 Ill. Adm. Code 724.115(b) for the following reasons(s): You do not have an inspection schedule.

Pursuant to 35 Ill. Adm. Code 724.115(d), the owner or operator must record inspections, and the specific data required by this Section in an inspection log or summary. These records must be kept for at least three years. You are in apparent violation of 35 Ill. Adm. Code 724.115(d) for the following reason(s): You do not have an inspection log.

Pursuant to 35 Ill. Adm. Code 724.131, facilities must be maintained and operated to minimize the possibility of a fire, explosion or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil or surface water which could threaten human health or the environment. You are in apparent violation of 35 Ill. Adm. Code 724.131 for the following reason(s): Drums of hazardous waste are being stored open.

Pursuant to 35 Ill. Adm. Code 724.135, the owner or operator must maintain aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment and decontamination equipment to any area of facility operation in an emergency. You are in apparent violation of this Section because adequate aisle space was not maintained on the date of the inspection.

Pursuant to 35 Ill. Adm. Code 724.137, the owner or operator must attempt to make arrangements to familiarize local police, fire departments, emergency response teams and hospitals as well as state authorities with the hazardous aspects of the facility. These arrangements are to be included in the contingency plan. You are in apparent violation of 35 Ill. Adm. Code 724.137 for the following reason(s): You have not made the required arrangements with local authorities regarding emergency assistance.

Pursuant to 35 Ill. Adm. Code 724.151(a), each owner or operator must have a contingency plan. The contingency plan must be designed to minimize hazards to human health or the environment from fires, explosions or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil or surface water. You are in apparent violation of 35 Ill. Adm. Code 724.151(a) for the following reason(s): You do not have a contingency plan.

Pursuant to 35 Ill. Adm. Code 724.153, a copy of the contingency plan and all revisions to the plan must be:

a) Maintained at the facility; and

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

You are in apparent violation of 35 Ill. Adm. Code 724.153 in that condition(s) a and b above was/were not complied with.

Pursuant to 35 Ill. Adm. Code 724.173, the owner or operator must keep a written operating record at the facility. The operating record must include the following:

1. A description and the quantity of each hazardous waste received and the method(s) and date(s) of its treatment, storage or disposal at the facility as required by Appendix I of 35 Ill. Adm. Code 724.173;

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

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

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

5. Records and results of inspections;

6. Monitoring, testing and other analytical data;

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

You are in apparent violation of 35 Ill. Adm. Code 724.173 for the following reason(s): You do not have an operating record.

Pursuant to 35 Ill. Adm. Code 724.175, the owner or operator must prepare and submit a single copy of an annual report to the Director by March 1 of each year. The annual report must cover facility activities during the previous calendar year and must include the following information:

a. The EPA identification number, name and address of the facility;

b. The calendar year covered by the report;

c. For off-site facilities, the EPA identification number of each hazardous waste generator from which the facility received a hazardous waste during the year; for imported shipments, the report must give the name and address of the foreign generator;

d. A description and the quantity of each hazardous waste the facility received during the year. For off-site facilities this information must be listed by EPA identification number of each generator;

e. The method of treatment, storage or disposal for each hazardous waste;

f. Monitoring data under Section 724.194(a)(2)(B) and (C) and (b)(2) where required;

g. The most recent closure cost estimate under Section 724.242 and for disposal facilities the most recent post-closure cost estimate under Section 724.244;

h. The certification signed by the owner or operator of the facility or his authorized representative.

You are in apparent violation of 35 Ill. Adm. Code 724.175 for the following reason(s): You have not submitted a Facility Annual Hazardous Waste Report for 1986.

Pursuant to 35 Ill. Adm. Code 724.176, if a facility accepts for storage any hazardous waste from an off-site source without an accompanying manifest, or without an accompaning shipping paper as described in 35 Ill. Adm. Code 723.120(e)(2), and if the waste is not excluded from the manifest requirement by 35 Ill. Adm. Code 721.105, then the owner or operator must prepare and submit a single copy of a report to the Agency within 15 days after receiving the waste. The unmanifested waste report must be submitted on EPA form 8700-13B. You are in apparent violation of 35 Ill. Adm. Code 724.176 in that you did not submit an unmanifested waste report for the hazardous waste you have on site, which was not accompanied by a manifest.

Pursuant to 35 Ill. Adm. Code 724.212(a), by May 19, 1981, the owner or operator must have a written closure plan. A copy of the closure plan and all revisions must be kept at the facility until closure is completed and certified. The closure plan must include at least:

1. A description of how and when the facility will be partially closed, if applicable, and finally closed. The plan must identify how the requirements of Sections 724.211, 724.213, 724.214 and 724.215 and applicable requirements of 724.297, 724.328, 724.380, 724.410, 724.451, 724.481 and 724.504 will be met;

2. An estimate of the maximum inventory of wastes in storage and in treatment at any time during the life of the facility;

3. A description of the steps needed to decontaminate facility equipment and surrounding soil if necessary;

4. An estimate of the expected year of closure and a schedule for final closure;

5. A provision for closure certification by an independent registered professional engineer.

You are in apparent violation of 35 Ill. Adm. Code 724.212(a) for the following reason(s): You do not have a closure plan.

Pursuant to 35 Ill. Adm. Code 724.242(a), the owner or operator must prepare a written estimate, in current dollars, of the cost of closing the facility in accordance with the closure plan as specified in Section 725.212. The closure cost estimate must equal the cost of closure at the point in the facility's operating life when the extent and manner of its operation would make closure the most expensive, as indicated by its closure plan. You are in apparent violation of 35 Ill. Adm. Code 724.242(a) for the following reason(s): You do not have a closure cost estimate.

Pursuant to 35 Ill. Adm. Code 724.271, if a container holding hazardous waste is not in good condition or if it begins to leak, the owner or operator must transfer the hazardous waste from this container to a container that is in good condition or manage the waste in some other way that it complies with the requirements of this Part. You are in apparent violation of 35 Ill. Adm. Code 724.271 for the following reason(s): Container X208 was leaking at the time of the inspection.

Pursuant to 35 Ill. Adm. Code 724.273(a), a container holding hazardous waste must always be closed during storage, except when it is necessary to add or remove waste. You are in apparent violation of 35 Ill. Adm. Code 724.273(a) for the following reason: Several containers were stored open at the inspection.

Pursuant to 35 Ill. Adm. Code 724.274, the owner or operator must inspect areas where containers are stored at least weekly, looking for leaks and for deterioration caused by corrosion or other factors. You are in apparent violation of 35 Ill. Adm. Code 724.274 for the following reason(s): You have not been conducting the required inspections.

MT:rmi/2173g/46-52

ENVIRONMENTAL PROTECTION AGENCY
INSPECTION REPORT

GW

USEPA Number: Non-notifier IEPA Number: 0971900034

Facility Name: Amerdec, Inc.

Street: 90 Le Baron
City: Waukegan Telephone: 312/623-6650
County: Lake State: IL Zip Code: 60085

Type of Facility: Notified As: Non-notifier Regulated As: Tr, S
LDF? yes __ no X HPV? yes X no __ 90 Day Follow-up Required? yes X no __

Region: 2 Date of Inspection: 2-6-87 From: 11:15 Am to 1:15 pm
Weather (LDF Only): _____

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

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

Notified As/Regulated As Matrix Number: 54 Key Letter: F

Notification date, N/A, from initial __ or subsequent __ notification.

Part A date, N/A, from initial __ or amended __. Part A withdrawan: _____

Part B permit application submitted? yes __ no X

Has the firm been referred to: USEPA? yes __ no X; IAG? yes __ no X; County States Attorney? yes __ no X. Date of referral to USEPA: _____, IAG: _____, County States Attorney: _____.

Federal Court Order Issued: _____ State Court Order Issued: _____

USEPA CACO Issued: _____ CAFO Issued: _____ ALJ Decision Issued: _____

Illinois PCB Order Issued: _____

TSD Facility Activity Summary

Activity (By Process Code)	On Pt A	Activity Conducted Prior to 1980	Was Activity Ever Done	Closed	Being Done at Time of Inspection	Exempt from Regulation per 35 IAC, Section:	On Annual Report For 84	85	86
S01	No Part A	No	YES	No	YES	N/A	N/A	N/A	NO A.R.

RECEIVED
MAY 20 1987
IEPA-DLPC

Operator: Amerder, Inc. Telephone #: 312/623-6650

Street: 90 Le Baron

City: Waukegan State: IL Zip Code: 60085

Owner: Mark I and a Joint Venture Telephone #: 312/

Street: 465 Evanston

City: Lake Bluff State: IL Zip Code: 60044

Person Interviewed	Title	Telephone #
Magie Allegretti	President	312/623-6650

Inspection Participants	Agency/Title	Telephone #
John Maher	IEPA/EPS 1	312/345-9780
Caroline Panico	IEPA/EPS 1	312/345-9780

Prepared By	Agency/Title	Telephone #
John Maher	IEPA/EPS 1	312/345-9780

Summary of Apparent Violations

Area	Class	Section

Area	Class	Section

Area	Class	Section

RECEIVED MAY 20 1987 IEPA-DLPC

RECEIVED MAR 18 1987 IEPA-DLPC

WASTE DISPOSITION FORM

Facility Name: Amerdec, Inc. USEPA #: Non-notifier IEPA #: 0971900034

Waste Name (Include haz & non-haz special & waste for which no determination has been made)	Generating Process (For waste gen. on site. N/A for TSD)	Date of Last Analysis	USEPA Haz Waste #	On 8700-12 *	On 3510-3 *	On Annual Rpt For 84 *	85 *	86 *	Amount On Site	Rate of Generation	Last Manifested Shipment	Dispsition
Spent Chrome Solution	Acquired from a plater's plating tank.	Not Available	D007 (F007 ?)	Non-Notifier	No Part A	N/A	N/A	No A.R.	3 drums	Not currently generated	Never Disposed	N/A
Index Filter Waste	Regenerating resins at former site (4425 W. Montrose, Chicago)	"	F006 (D007 ?)	"	"	"	"	"	9 drums	"	"	"
Unknown Aqueous Waste	Unknown	"	Unknown	"	"	"	"	"	5 drums	"	"	"
Spent Resins	Removing resins from used ion exchange columns (Generated at 4425 W. Montrose, Chicago)	"	F006 (D007 ?)	"	"	"	"	"	~ 300 Gallons	"	"	"

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RECEIVED MAR 18 1988 IEPA-DLPC

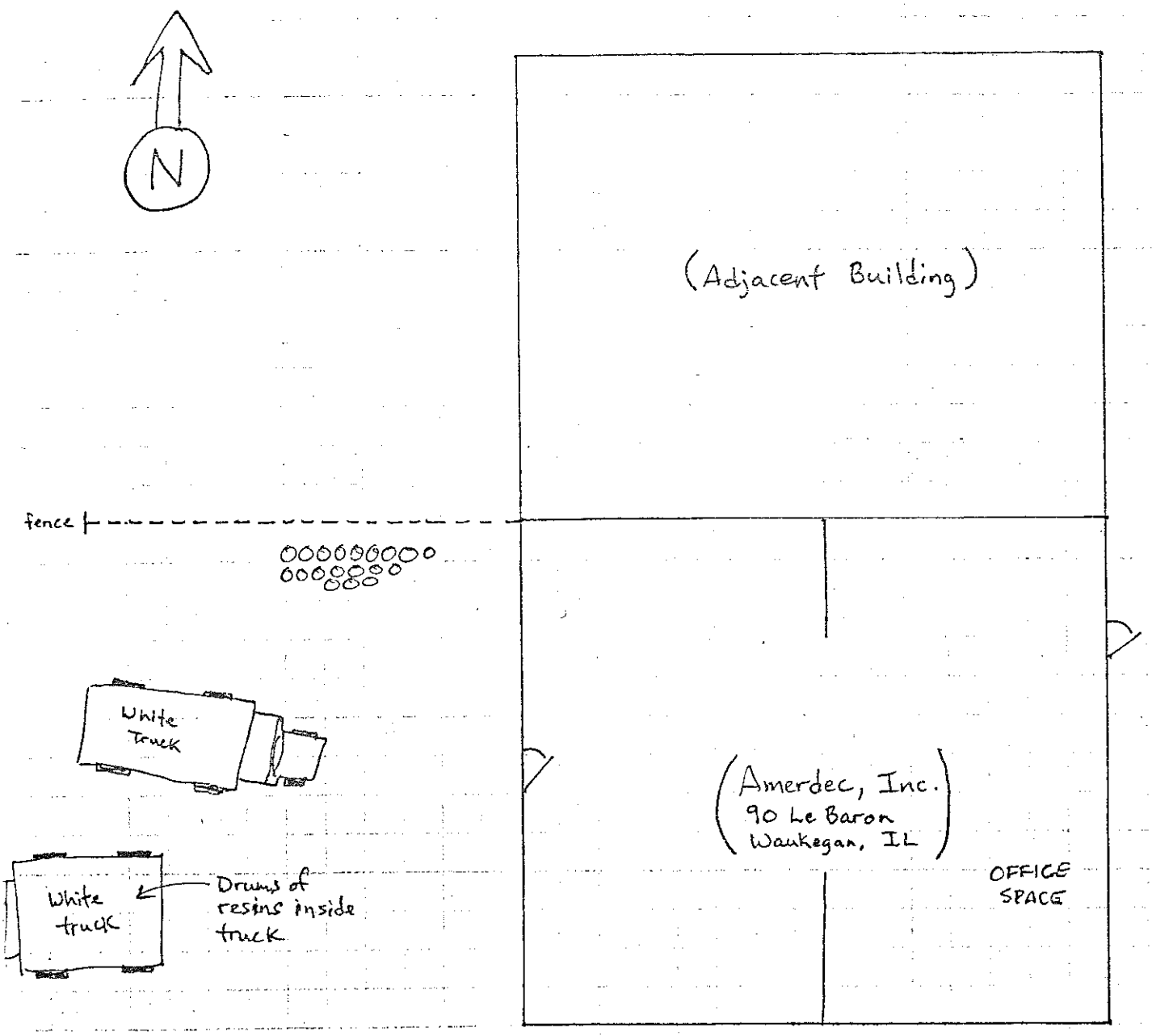
* All "no" responses must be explained in the narrative

Facility Name: Amerdec, Inc.

USEPA Number: Non-notifier IEPA Number: 0871900034

Sketch of Site: ___ Accumulation Area(s) ___ Treatment Area(s) ___ Storage Area(s)

___ Disposal Area(s) X Entire Site



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MAY
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RECEIVED
MAR 18 1987
IEPA-DLPC

NARRATIVE

RECEIVED
MAR 18 1987
IEPA-DLPC

After arriving at Amerdec, Inc., we spoke to Magie Allegretti to let her know we had arrived. We then proceed to the drum storage area. Amerdec has nineteen drums located on the east end of their building. We marked each drum with a number, ranging from X201 to X219. Two of the drums (X216 and X218) were empty. The other seventeen drums collectively contained a variety of waste types. The contents and drum markings for each drum are described as follows:

X201 - solid, brown, few blue crystals, full, filter paper

X202 - solid, light brown, frozen, filter paper, full

X203 - solid, filter paper, full

X204 - solid, light brown, filter paper, hard, full

X205 - solid, much filter paper, 2/3 full

X206 - solid, brown, ice on top, full

X207 - solid, orange brown, blue crystals in center, full

X208 - liquid, yellow/brown, marked "SULFURIC ACID", field pH = 2 - 3, full

X209 - solid, dark brown, ½ frozen on top, 2/3 full

X210 - liquid, yellow/brown, ice on top, full

X211 - liquid, yellow/brown, marked "HIGRADE STRIPPER", ice on top, full

X212 - frozen, closed, marked "SULFURIC ACID"

X213 - frozen, closed

X214 - solid, frozen, open

X215 - frozen, closed

X216 - marked "SODIUM CYANIDE", poison label, empty, approx. 20gal. capacity

X217 - frozen, closed

X218 - marked "SULFURIC ACID", closed, empty

X219 - frozen, 2/3 full

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IEPA-DLPC

The contents of drums X201 through X211 were sampled by either myself (John Maher) or Caroline Panico. Two samples were taken from each sampled container inorder to have an indication of the variability of heavy metal concentration within each drum. After the samples were collected we transported them to the Maywood office, where they were sealed and secured in the refrigerator

Date: 2-6-87

Time: 11:15 Am - 1:15 Pm ~~A.M.~~ ~~P.M.~~

Photograph By:

John Maher

Location:

0971900034 - Lake Co.

Waukegan / Amerdec

Comments: Photograph taken toward the North behind the building

Date: 2-6-87

Time: 11:15 Am - 1:15 Pm ~~A.M.~~ ~~P.M.~~

Photograph By:

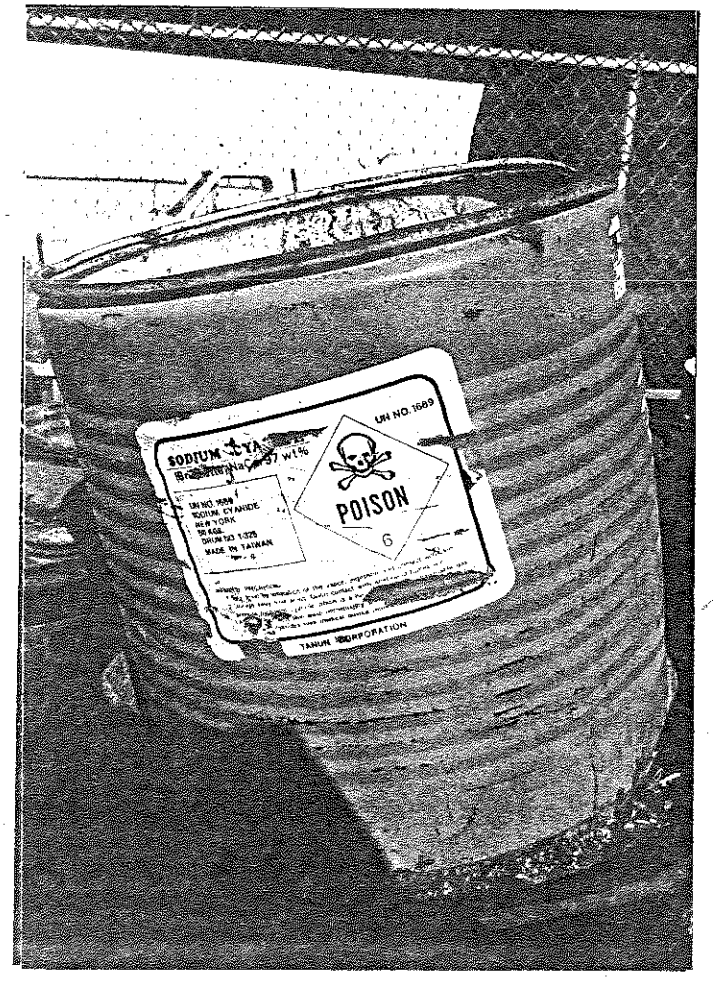
John Maher

Location:

0971900034 - Lake Co.

Waukegan / Amerdec

Comments: Photograph taken toward the North behind the building



RECEIVED
MAY 30 1987
IEPA-DLPC

RECEIVED
MAR 18 1987
IEPA-DLPC

Date: 2-6-87

Time: 11:15 Am - 1:15 pm ~~A.M.-P.M.~~

Photograph By:

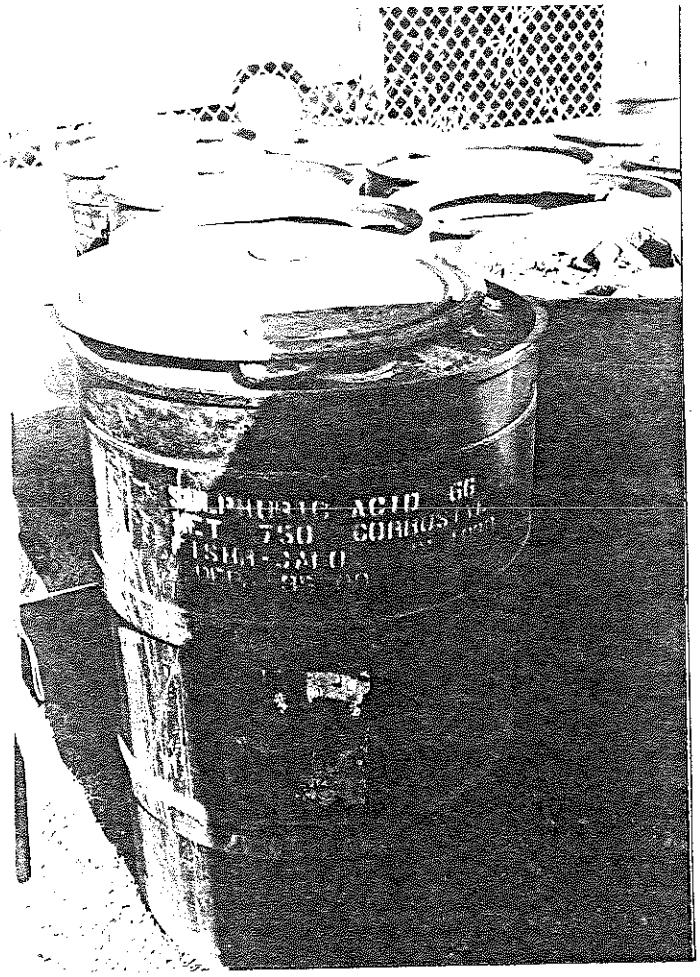
John Maher

Location:

097190034 - Lake Co.

Waukegan / Amerdec

Comments: Photograph taken toward the North behind the building



RECEIVED
MAY 20 1987
IEPA-DLPC

Date: 2-6-87

Time: 11:15 Am - 1:15 pm ~~A.M.-P.M.~~

Photograph By:

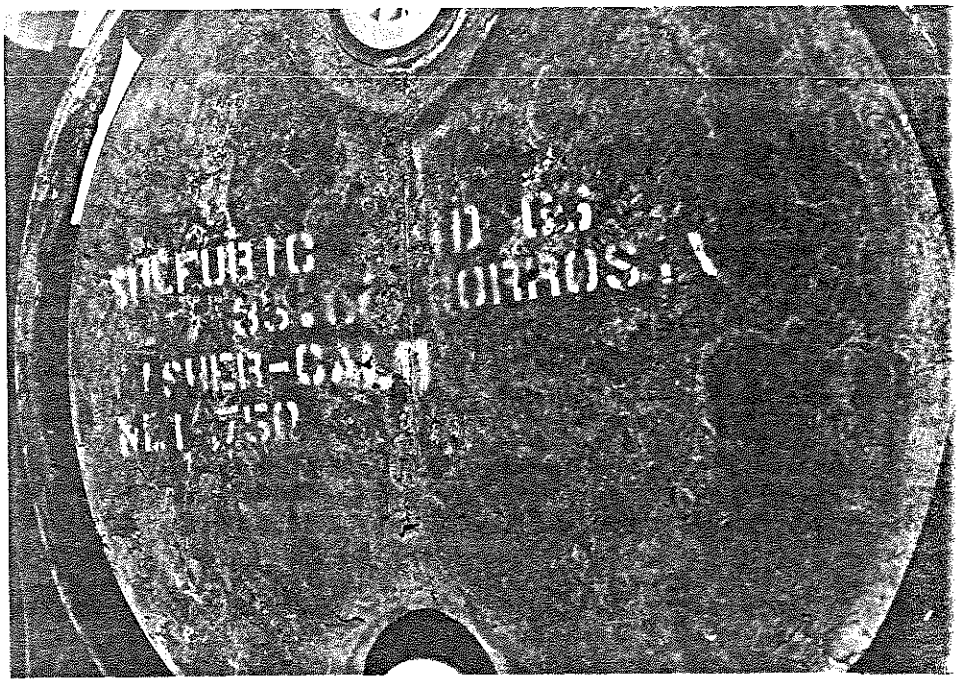
John Maher

Location:

097190034 - Lake Co.

Waukegan / Amerdec

Comments: Photograph taken toward the West behind the building



RECEIVED
RECEIVED MAR 18 1987
MAY 20 1987 IEPA-DLPC
IEPA-DLPC

Date: 2-6-87

Time: 11:15am - 1:15pm ~~A.M./P.M.~~

Photograph By:

John Maher

Location:

097190034 - Lake Co.

Waukegan / Amerdec

Comments: Photograph taken toward the Northwest behind the building

Date: 2-6-87

Time: 11:15am - 1:15pm ~~A.M./P.M.~~

Photograph By:

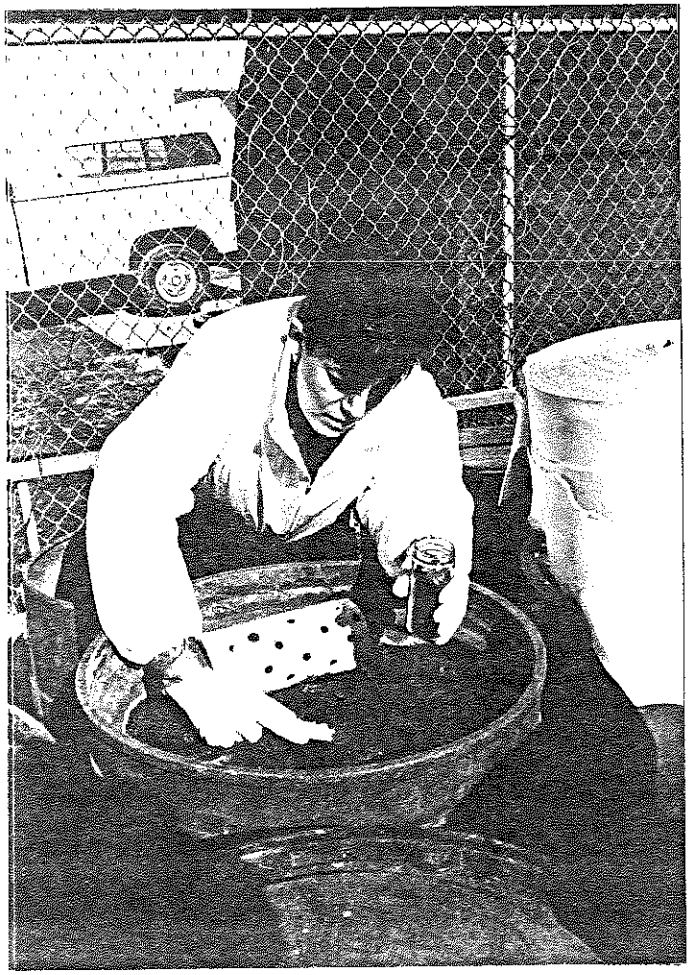
John Maher

Location:

097190034 - Lake Co.

Waukegan / Amerdec

Comments: Photograph taken toward the North behind the building



RECEIVED
MAY 20 1987
IEPA-DLPC

RECEIVED
MAR 18 1987
IEPA-DLPC

Date: 2-6-87

Time: 11:15am - 1:15pm ~~A.M. P.M.~~

Photograph By:

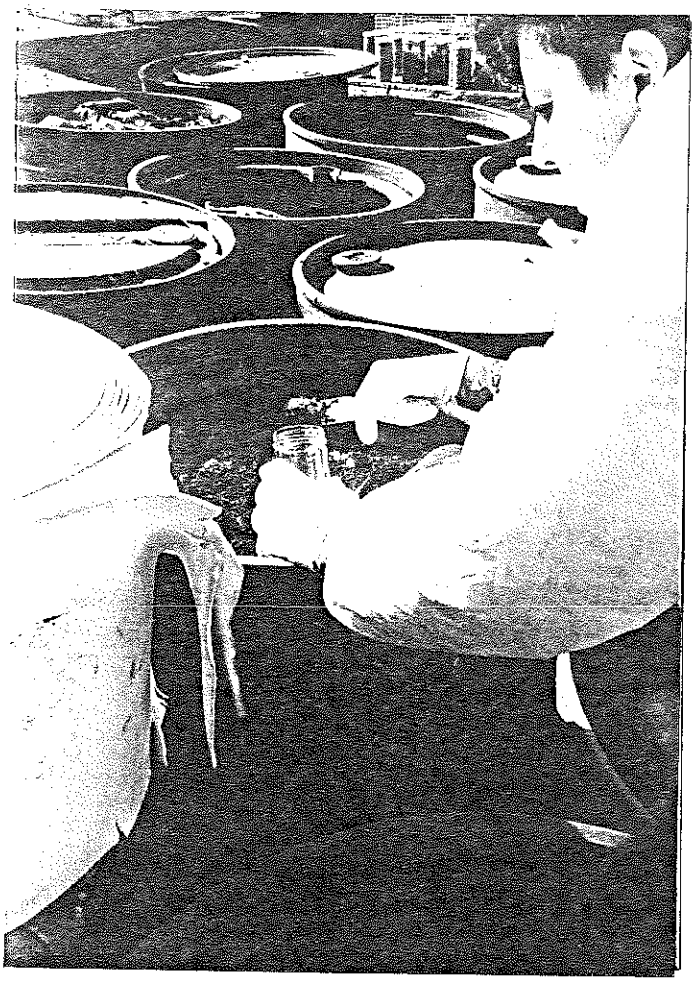
John Maher

Location:

0971900034 - Lake Co.

Waukegan / Amerdec

Comments: Photograph taken toward the West behind the building



Date: 2-6-87

Time: 11:15am - 1:15pm ~~A.M. P.M.~~

Photograph By:

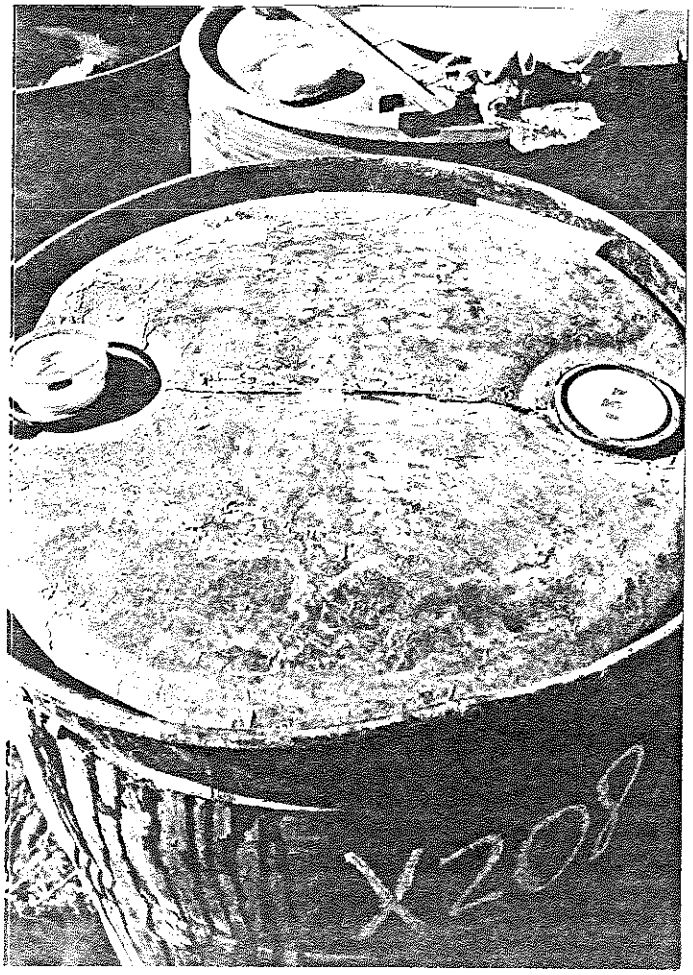
John Maher

Location:

0971900034 - Lake Co.

Waukegan / Amerdec

Comments: Photograph taken toward the West behind the building



RECEIVED
MAR 18 1987
IEPA-DLPC

RECEIVED
MAY 20 1987
IEPA-DLPC

Date: 2-6-87

Time: 11:15 Am - 1:15 Pm ~~A.M. P.M.~~

Photograph By:

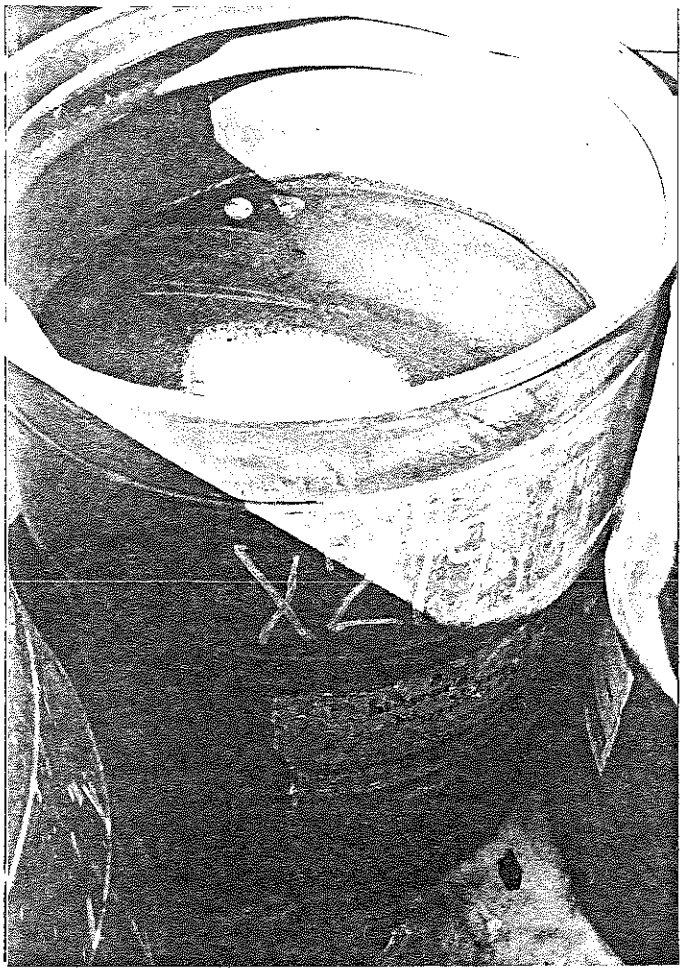
John Maher

Location:

0971900034 - Lake Co.

Waukegan / Amerdec

Comments: Photograph taken toward the North behind the building



Date: 2-6-87

Time: 11:15 Am - 1:15 Pm ~~A.M. P.M.~~

Photograph By:

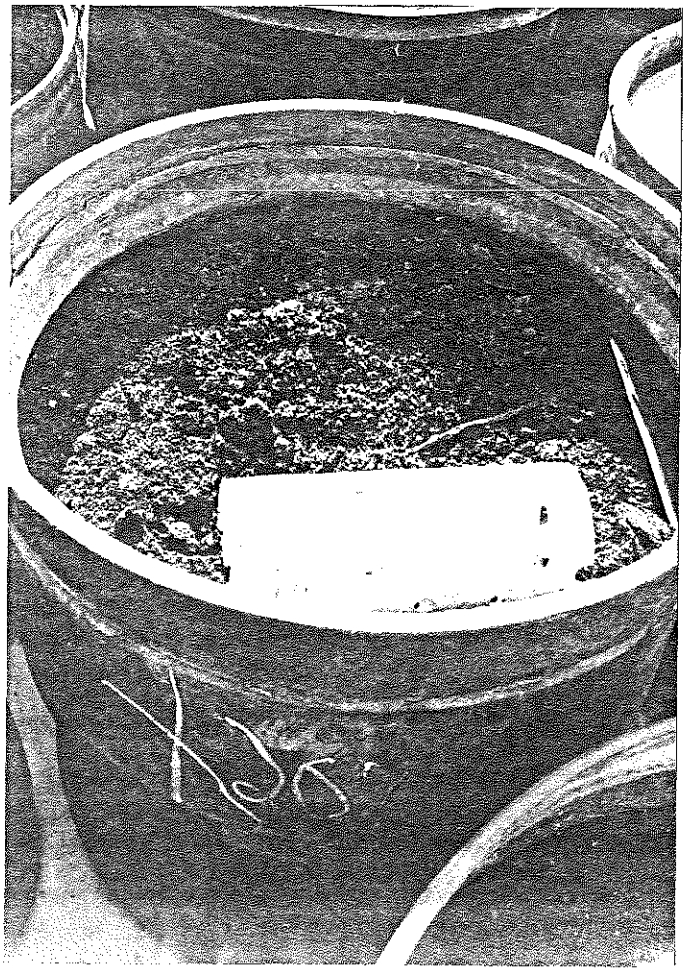
John Maher

Location:

0971900034 - Lake Co.

Waukegan / Amerdec

Comments: Photograph taken toward the South behind the building



RECEIVED
MAY 20 1987
IEPA-DLPC

RECEIVED
MAR 18 1987
IEPA-DLPC

Date: 2-6-87

Time: 11:15am - 1:15pm ~~A.M./P.M.~~

Photograph By:

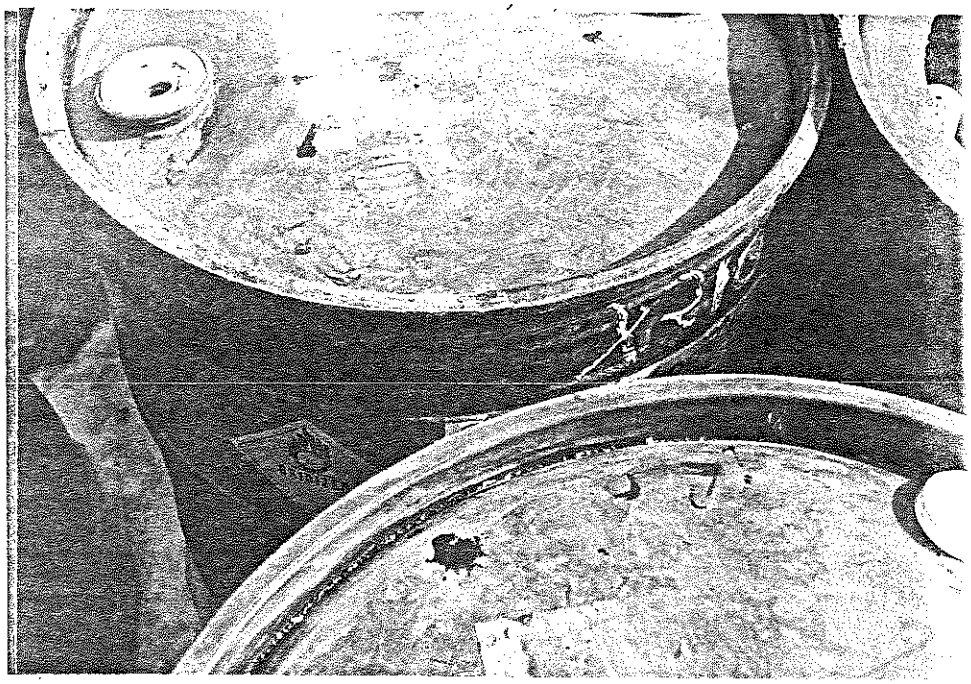
John Maher

Location:

0971900034 - Lake Co.

Waukegan / Amerdec

Comments: Photograph taken toward the East behind the building



Date: 2-6-87

Time: 11:15am - 1:15pm ~~A.M./P.M.~~

Photograph By:

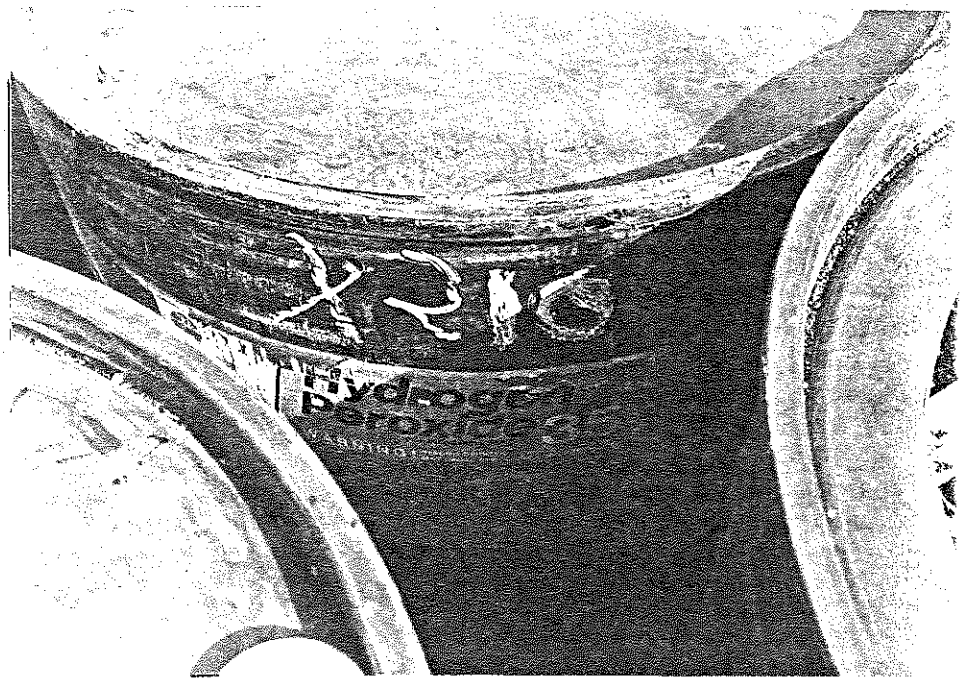
John Maher

Location:

0971900034 - Lake Co.

Waukegan / Amerdec

Comments: Photograph taken toward the Northeast behind the building



~~RECEIVED~~ RECEIVED
~~MAR 20 1987~~ MAR 18 1987
~~IEPA-DLPC~~ IEPA-DLPC

Date: 2-6-87

Time: 11:15am - 1:15pm ~~A.M.-P.M.~~

Photograph By:

John Maher

Location:

0971900034 - Lake Co.

Waukegan / Amerdec

Comments: Photograph taken toward the East behind the building

Date: 2-6-87

Time: 11:15am - 1:15pm ~~A.M.-P.M.~~

Photograph By:

John Maher

Location:

0971900034 - Lake Co.

Waukegan / Amerdec

Comments: Photograph taken toward the West behind the building

RECEIVED
MAY 20 1987
IEPA-DLPC

RECEIVED
MAR 18 1987
IEPA-DLPC

Date: 2-6-87

Time: 11:15am - 1:15pm ~~A.M./P.M.~~

Photograph By:

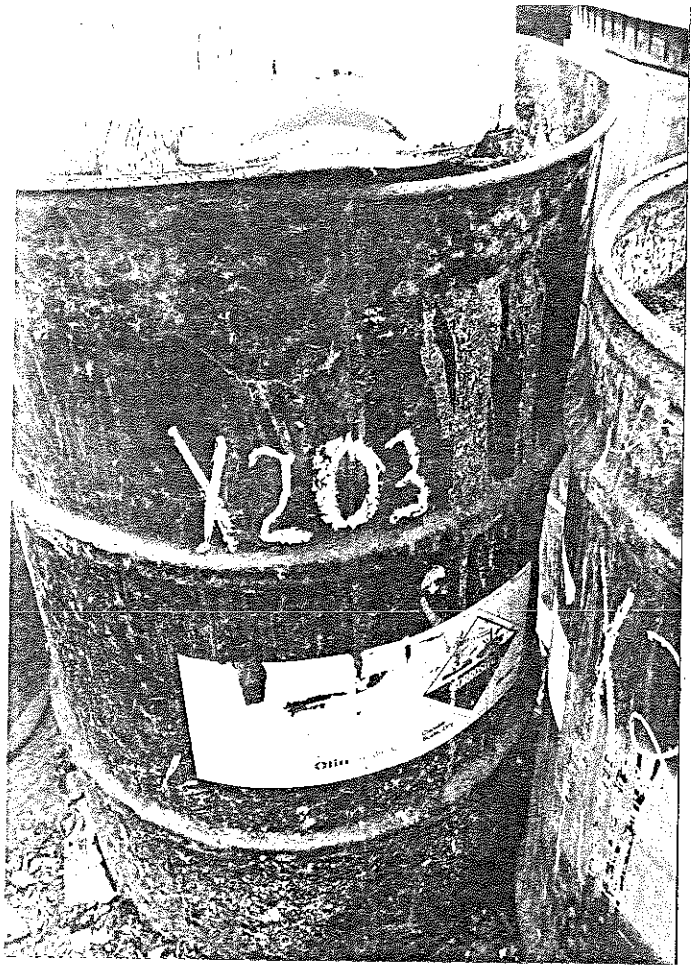
John Maher

Location:

0971900034 - Lake Co.

Waukegan / Amerdec

Comments: Photograph taken toward the Northwest behind the building



Date: 2-6-87

Time: 11:15am - 1:15pm ~~A.M./P.M.~~

Photograph By:

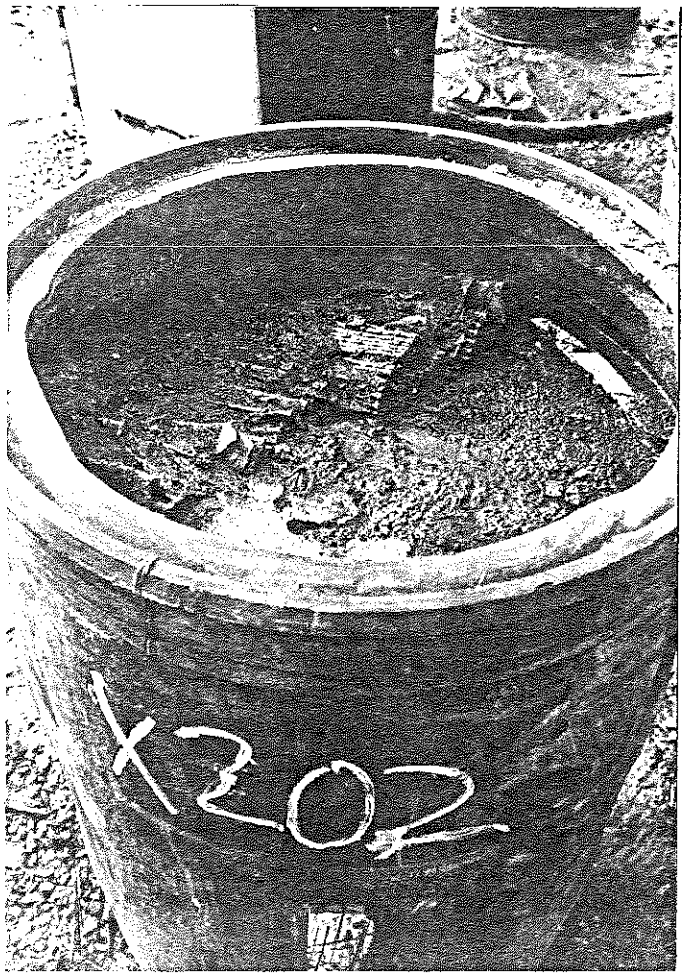
John Maher

Location:

0971900034 - Lake Co.

Waukegan / Amerdec

Comments: Photograph taken toward the West behind the building



RECEIVED

RECEIVED MAR 18 1987

MAY 20 1987

IEPA-DLPC

Date: 2-6-87

Time: 11:15am - 1:15pm ~~A.M. P.M.~~

Photograph By:

John Maher

Location:

0971900034 - Lake Co.

Waukegan / Amerdec

Comments: Photograph taken toward the North behind the building

Date: 2-6-87

Time: 11:15am - 1:15pm ~~A.M. P.M.~~

Photograph By:

John Maher

Location:

0971900034 - Lake Co.

Waukegan / Amerdec

Comments: Photograph taken toward the Northeast behind the building

RECEIVED

RECEIVED MAR 18 1987

MAY 20 1987 IEPA-DLPC

IEPA-DLPC

(1) Soil (X) Special
(2) Waste
(3) Other

Sampling Purpose 04

Program Code LP 41 Unit Code K

01 - Special Request
02 - Criminal enforcement
03 - Emergency response
04 - Routine Sampling

Time Collected: 11:30

Date Collected: 2-6-87

Lab # C700664

SPECIAL ANALYSIS FORM

Date Received 2-9-87

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF LAND/NOISE POLLUTION CONTROL

SAMPLE# X201 A

COUNTY: Cook Lake

FILE HEADING: Waukegan/Amerdec, Inc. ~~Chicago/American Demineralizer~~

FILE NUMBER: 0971900034 ~~0316660003~~

SOURCE OF SAMPLE: (Exact Location)

55 gallon drum behind the building at 90 Le Baron, Waukegan, Illinois (American Demineralizer's new location).

PHYSICAL OBSERVATIONS, REMARKS:

mixed filter paper and salt-like material

TESTS REQUESTED: E.P. Toxicity for heavy metals, Total Cyanide (SW 846 must be used)

COLLECTED BY: John Maher

TRANSPORTED BY: (initials)

LABORATORY

RECEIVED BY: K. Patel

DATE COMPLETED: 2:30 pm

DATE FORWARDED: APR. 24 1987

J. Daugherty

pH final 5.2 initial 6.4

CN - 163.4 mg/kg

As - < 0.01

Ba - 0.5

Cd - 1.15

Cr - 0.16

Pb - 0.22

Hg - 0.004

Se - < 0.01

Ag - < 0.005

RECEIVED
MAY 20 1987
IEPA-DLPC

RESULTS EXPRESSED IN MG/LITER UNLESS ~~OTHERWISE SPECIFIED.~~

RECEIVED
JUN 27 1987
IEPA-DLPC

IL 532-0314
LPC 8A 4/77

C700664 (NOT FOR DATA PROCESSING)

Environmental Protection Agency
Division of Laboratory Services
2121 W. Taylor Street
Chicago, Illinois 60612

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

SAMPLE NUMBER : C700664
SAMPLING POINT DESC. : COOK-CHGO\AMERICAN DEMINERALIZER X201A

SUBMITTING SOURCE # : SITE # : 0316160003
DATE COLLECTED : 870206 TIME COLLECTED : 1130 SAMPLING PROGRAM :

COLLECTED BY : JOHN MAHER DELIVERED BY : CP
COMMENTS :
FUNDING CODE : LP41 AGENCY ROUTING : 00 UNIT CODE :
SAM TYPE CODE : LPEP SAMPLE PURPOSE CODE : 0

DATE RECEIVED : 870209 TIME RECEIVED : 1430 RECEIVED BY : KGP
LAB OBSERVATIONS : REPORTING INDICATOR :
SUPERVISORS INITIALS : JWD NOTE : K = LESS THAN VALUE

A10000	PH,FINAL TOX EXT	UNITS :	5.2
A10000	PH,INITIAL TOX EX	UNITS :	6.4
A11600	CYANIDE,TOT.SW846	MG/KG :	163.4
A14400	ARSENIC,EP TOX.	MG/L :	0.01K
A14500	BARIUM,EP TOX	MG/L :	0.5
A14600	CADMIUM,EP TOX.	MG/L :	1.15
A14700	CHROMIUM,EP TOX.	MG/L :	0.16
A15100	LEAD,EP TOXICITY	MG/L :	0.22
A15300	MERCURY,EP TOX.	MG/L :	0.004
A15500	SELENIUM,EP TOX.	MG/L :	0.01K
A15600	SILVER,EP TOX.	MG/L :	.005K

RECEIVED
MAY 20 1987
IEPA-DLPC

RECEIVED
APR 27 1987
IEPA-DLPC

(1) Sampling Purpose 04

(2) Waste
(3) Other

Program Code LP 41 Unit Code K

01 - Special Request
02 - Criminal enforcement
03 - Emergency response
04 - Routine Sampling

Time Collected: 11:35

Lab # C700665

SPECIAL ANALYSIS FORM

Date Collected: 2-6-87

Date Received 2-9-87

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF LAND/NOISE POLLUTION CONTROL

SAMPLE# X202A

COUNTY: Cook Lake

FILE HEADING: Waukegan/Amerdec, Inc. ~~Chicago/American Demineralizer~~

FILE NUMBER: 0971900034 ~~0316660003~~

SOURCE OF SAMPLE: (Exact Location)

55 gallon drum behind the building at 90 Le Baron, Waukegan, Illinois (American Demineralizer's new location).

PHYSICAL OBSERVATIONS, REMARKS:

coarse, soil-like material

TESTS REQUESTED: E.P. Toxicity for heavy metals, Total Cyanide

(SW 846 must be used)

COLLECTED BY: Caroline Panico

TRANSPORTED BY: (initials)

LABORATORY

RECEIVED BY: K. Patel 2:30 PM

DATE COMPLETED:

DATE FORWARDED: APR. 24 1987

J Daugherty

pH final 5.1 initial 6.9

CN - 265 mg/kg

As - < 0.01

Ba - 0.6

Cd - 0.40

Cr - 0.30

Pb - 0.08

Hg - 0.001

Se - < 0.01

Ag - < 0.005

~~RECEIVED~~
~~MAY 20 1987~~
~~IEPA-ULPC~~

RESULTS EXPRESSED IN MG/LITER UNLESS OTHERWISE SPECIFIED

RECEIVED
APR 27 1987

IL 532-0314
LPC 8A 4/77

C700665

(NOT FOR DATA PROCESSING)

Environmental Protection Agency
Division of Laboratory Services
2121 W. Taylor Street
Chicago, Illinois 60612

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

SAMPLE NUMBER : C700685
SAMPLING POINT DESC. : COOK-CHGO\AMERICAN DEMINERALIZER X202A

SUBMITTING SOURCE # : SITE # : 0316160003
DATE COLLECTED : 870206 TIME COLLECTED : 1135 SAMPLING PROGRAM :

COLLECTED BY : CAROLINE PANICO DELIVERED BY : CP
COMMENTS :
FUNDING CODE : LP41 AGENCY ROUTING : 00 UNIT CODE :
SAM TYPE CODE : LPEP SAMPLE PURPOSE CODE : 0

DATE RECEIVED : 870209 TIME RECEIVED : 1430 RECEIVED BY : KGP
LAB OBSERVATIONS : REPORTING INDICATOR :
SUPERVISORS INITIALS : JWD NOTE : K = LESS THAN VALUE

A10000	PH,FINAL TOX EXT	UNITS	: 5.1
A10000	PH,INITIAL TOX EX	UNITS	: 6.9
A11600	CYANIDE,TOT.SW846	MG/KG	: 255
A14400	ARSENIC,EP TOX.	MG/L	: 0.01K
A14500	BARIUM,EP TOX	MG/L	: 0.8
A14600	CADMIUM,EP TOX.	MG/L	: 0.40
A14700	CHROMIUM,EP TOX.	MG/L	: 0.30
A15100	LEAD,EP TOXICITY	MG/L	: 0.08
A15300	MERCURY,EP TOX.	MG/L	: 0.001
A15500	SELENIUM,EP TOX.	MG/L	: 0.01K
A15600	SILVER,EP TOX.	MG/L	: .005K

RECEIVED
MAY 20 1987
IEPA-DLPC

RECEIVED
APR 27 1987
IEPA-DLPC

(1) Soil
(2) Waste
(3) Other

Sampling Purpose 04

01 - Special Request
02 - Criminal enforcement
03 - Emergency response
04 - Routine Sampling

Program Code LP 41 Unit Code K

Lab # C700666

Time Collected: 11:45

SPECIAL ANALYSIS FORM

Date Collected: 2-6-87

Date Received 2-9-87

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF LAND/NOISE POLLUTION CONTROL

SAMPLE# X 203 A

COUNTY: ~~Cook~~ Lake

FILE HEADING: Waukegan / Amordec, Inc. ~~Chicago / American Demineralizer~~

FILE NUMBER: 0971900034 ~~0316160003~~

SOURCE OF SAMPLE: (Exact Location)

55 gallon drum behind the building of 90 Le Baron, Waukegan, Illinois (American Demineralizer's new location).

PHYSICAL OBSERVATIONS, REMARKS:

Coarse, soil-like material with blue-green particles

TESTS REQUESTED: E.P. Toxicity for heavy metals, Total Cyanide

(SW 846 must be used)

COLLECTED BY: John Maher

TRANSPORTED BY: (initials)

LABORATORY

RECEIVED BY: K. Patel 2:30 PM

DATE COMPLETED:

DATE FORWARDED: APR. 24. 1987

J. Daugherty

pH final 5.2 initial 8.7

CN - 95.8 mg/Kg

As - < 0.01

Ba - 1.3

Cd - 0.65

Cr - 0.15

Pb - 0.07

Hg - 0.0004

Se - < 0.01

Ag - < 0.005

RECEIVED
MAY 30 1987
IEPA-DLPC

RESULTS EXPRESSED IN MG/LITER UNLESS OTHERWISE SPECIFIED.

RECEIVED APR 27 1987 IEPA-DLPC

IL 532-0314
LPC 8A 4/77

(NOT FOR DATA PROCESSING)

C700666

Environmental Protection Agency
Division of Laboratory Services
2121 W. Taylor Street
Chicago, Illinois 60612

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

SAMPLE NUMBER : C700666
SAMPLING POINT DESC. : COOK-CHGO\AMERICAN DEMINERALIZER X203A

SUBMITTING SOURCE # : SITE # : 0316160003
DATE COLLECTED : 870206 TIME COLLECTED : 1145 SAMPLING PROGRAM :

COLLECTED BY : JOHN MAHER DELIVERED BY : CP
COMMENTS :
FUNDING CODE : LP41 AGENCY ROUTING : 00 UNIT CODE :
SAM TYPE CODE : LPEP SAMPLE PURPOSE CODE : 0

DATE RECEIVED : 870209 TIME RECEIVED : 1430 RECEIVED BY : KGP
LAB OBSERVATIONS : REPORTING INDICATOR :
SUPERVISORS INITIALS : JWD NOTE : K = LESS THAN VALUE

A10000	PH,FINAL TOX EXT	UNITS :	5.2
A10000	PH,INITIAL TOX EX	UNITS :	8.7
A11600	CYANIDE,TOT.SW846	MG/KG :	95.8
A14400	ARSENIC,EP TOX.	MG/L :	0.01K
A14500	BARIUM,EP TOX	MG/L :	1.3
A14600	CADMIUM,EP TOX.	MG/L :	0.65
A14700	CHROMIUM,EP TOX.	MG/L :	0.15
A15100	LEAD,EP TOXICITY	MG/L :	0.07
A15300	MERCURY,EP TOX.	MG/L :	0.0004
A15500	SELENIUM,EP TOX.	MG/L :	0.01K
A15600	SILVER,EP TOX.	MG/L :	.005K

RECEIVED
MAY 20 1987
IEPA-DLPC

RECEIVED
APR 27 1987
IEPA-DLPC

(1) Soil
(2) Waste
(3) Other

Sampling Purpose 04

Program Code LP 41 Unit Code K

01 - Special Request
02 - Criminal enforcement
03 - Emergency response
04 - Routine Sampling

Lab # C700667

Time Collected: 11:50

SPECIAL ANALYSIS FORM

Date Collected: 2-6-87

Date Received 2-9-87

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF LAND/NOISE POLLUTION CONTROL

SAMPLE# X204 A

COUNTY: Cook Lake

FILE HEADING: Waukegan/Amerdec, Inc ~~Chicago/American Demineralizer~~

FILE NUMBER: 0971900034 ~~0316160003~~

SOURCE OF SAMPLE: (Exact Location)

55 gallon drum behind the building at 90 Le Baron, Waukegan, Illinois (American Demineralizer's new location).

PHYSICAL OBSERVATIONS, REMARKS:

Coarse soil-like material with blue-green particles

TESTS REQUESTED: E.P. Toxicity for heavy metals, Total Cyanide

(SW 846 must be used)

COLLECTED BY: Caroline Panico

TRANSPORTED BY: (initials)

LABORATORY

RECEIVED BY: K. Patel 2:30 PM

DATE COMPLETED:

DATE FORWARDED: APR. 24. 1987

pH final 5.1 initial 8.3

CN - 537.7 mg/kg

As - <0.01

Ba - 2.6

Cd - 0.30

Cr - 0.30

Pb - 0.08

Hg - 0.0004

Se - <0.01

Ag - <0.005

J Dougherty

RECEIVED
MAY 20 1987
IEPA-DLPC

RESULTS EXPRESSED IN MG/LITER UNLESS OTHERWISE SPECIFIED

RECEIVED
APR 27 1987
IEPA-DLPC

IL 532-0314
LPC 8A 4/77

C700667

(NOT FOR DATA PROCESSING)

Environmental Protection Agency
Division of Laboratory Services
2121 W. Taylor Street
Chicago, Illinois 60612

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

SAMPLE NUMBER : C700867
S PLING POINT DESC. : COOK-CHGO\AMERICAN DEMINERALIZER X204A

SUBMITTING SOURCE # : SITE # : 0316160003
DATE COLLECTED : 870206 TIME COLLECTED : 1150 SAMPLING PROGRAM :

COLLECTED BY : CAROLINE PANICO DELIVERED BY : CP
COMMENTS :
FUNDING CODE : LP41 AGENCY ROUTING : OD UNIT CODE :
SAM TYPE CODE : LPEP SAMPLE PURPOSE CODE : D

DATE RECEIVED : 870209 TIME RECEIVED : 1430 RECEIVED BY : KGP
LAB OBSERVATIONS : REPORTING INDICATOR :
SUPERVISORS INITIALS : JWD NOTE : K = LESS THAN VALUE

A10000	PH,FINAL TOX EXT	UNITS :	5.1
A10000	PH,INITIAL TOX EX	UNITS :	8.3
A11600	CYANIDE,TOT.SW846	MG/KG :	557.7
A14400	ARSENIC,EP TOX.	MG/L :	0.01K
A14500	BARIUM,EP TOX	MG/L :	2.6
A14600	CADMIUM,EP TOX.	MG/L :	0.30
A14700	CHROMIUM,EP TOX.	MG/L :	0.30
A15100	LEAD,EP TOXICITY	MG/L :	0.08
A15300	MERCURY,EP TOX.	MG/L :	0.0004
A15500	SELENIUM,EP TOX.	MG/L :	0.01K
A15600	SILVER,EP TOX.	MG/L :	.005K

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ampling Purpose 04

01 - Special Request
02 - Criminal enforcement
03 - Emergency response
04 - Routine Sampling

(2) Waste
(3) Other

Program Code LP 41 Unit Code K

Time Collected: 12:00

Date Collected: 2-6-87

Lab # C700668

SPECIAL ANALYSIS FORM

Date Received 2-9-87

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF LAND/NOISE POLLUTION CONTROL

SAMPLE# 205 A

COUNTY: Cook Lab

FILE HEADING: ~~Chicago/American Demineralizer~~ Waukegan/Amerdec, Inc.

FILE NUMBER: 0971900034 ~~0316110003~~

SOURCE OF SAMPLE: (Exact Location)

55 gallon drum behind the building at 90 Le Baron, Waukegan, Illinois (American Demineralizer's new location).

PHYSICAL OBSERVATIONS, REMARKS:

Coarse soil-like material with filter paper

TESTS REQUESTED: E.P. Toxicity for heavy metals, Total Cyanide

(SW 846 must be used)

COLLECTED BY: John Maher

TRANSPORTED BY: (initials)

LABORATORY

RECEIVED BY: K. Patel 2:30 pm

DATE COMPLETED:

DATE FORWARDED: APR. 24. 1987

J. Daugherty

pH final 5.0 initial 7.3

CN - 93.4 mg/kg

As - <0.01

Ba - 0.4

Cd - 0.65

Cr - 0.28

Pb - 0.28

Hg - 0.0006

Se - <0.01

Ag - <0.005

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STATE OF ILLINOIS

RESULTS EXPRESSED IN MG/LITER UNLESS OTHERWISE SPECIFIED.

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MAY 20 1987
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RECEIVED
APR 27 1987

IL 532-0314
LPC 8A 4/77

C700668

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Environmental Protection Agency
Division of Laboratory Services
2121 W. Taylor Street
Chicago, Illinois 60612

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

SAMPLE NUMBER : C700668
SAMPLING POINT DESC. : COOK-CHGO\AMERICAN DEMINERALIZER X205A

SUBMITTING SOURCE # : SITE # : 0316160003
DATE COLLECTED : 870206 TIME COLLECTED : 1200 SAMPLING PROGRAM :

COLLECTED BY : JOHN MAHER DELIVERED BY : CP
COMMENTS :
FUNDING CODE : LP41 AGENCY ROUTING : 00 UNIT CODE :
SAM TYPE CODE : LPEP SAMPLE PURPOSE CODE : 0

DATE RECEIVED : 870209 TIME RECEIVED : 1430 RECEIVED BY : KGP
LAB OBSERVATIONS : REPORTING INDICATOR :
SUPERVISORS INITIALS : JWO NOTE : K = LESS THAN VALUE

A10000	PH/FINAL TOX EXT	UNITS :	5.0
A10000	PH/INITIAL TOX EX	UNITS :	7.5
A11600	CYANIDE/TOT.SW846	MG/KG :	95.4
A14400	ARSENIC/EP TOX.	MG/L :	0.01K
A14500	BARIUM/EP TOX	MG/L :	0.4
A14600	CADMIUM/EP TOX.	MG/L :	0.65
A14700	CHROMIUM/EP TOX.	MG/L :	0.28
A15100	LEAD/EP TOXICITY	MG/L :	0.28
A15300	MERCURY/EP TOX.	MG/L :	0.0006
A15500	SELENIUM/EP TOX.	MG/L :	0.01K
A15600	SILVER/EP TOX.	MG/L :	.005K

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APR 27 1987
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(X) Special
(1) Soil
(2) Waste
(3) Other

Sampling Purpose 04

Program Code LP 41 Unit Code K

01 - Special Request
02 - Criminal enforcement
03 - Emergency response
04 - Routine Sampling

Time Collected: 12:00

Lab # C700669

SPECIAL ANALYSIS FORM

Date Collected: 2-6-87

Date Received 2-9-87

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF LAND/NOISE POLLUTION CONTROL

SAMPLE# 2021 A

COUNTY: Cook Lake

FILE HEADING: Waukegan/Amerdec, Inc ~~Chicago/American Demineralizer~~

FILE NUMBER: 0971900034 ~~0316110003~~

SOURCE OF SAMPLE: (Exact Location)

55 gallon drum behind the building at 90 Le Baron, Waukegan, Illinois (American Demineralizer's new location)

PHYSICAL OBSERVATIONS, REMARKS:

Coarse soil-like material with blue particles

TESTS REQUESTED: E.P. Toxicity for heavy metals, Total Cyanide

(SW 846 must be used)

COLLECTED BY: Caroline Panico

TRANSPORTED BY: (initials)

LABORATORY

RECEIVED BY: K. Patel 2:30 PM

DATE COMPLETED:

DATE FORWARDED: APR. 24. 1987

pH final 5.0 initial 7.9

CN - 853 mg/lg

As - <0.01

Ba - 1.0

Cd - 0.40

Cr - 0.525

Pb - 0.07

Hg - 0.031

Se - <0.01

Ag - <0.005

RESULTS EXPRESSED IN MG/LITER UNLESS OTHERWISE SPECIFIED

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Chicago, Illinois 60680

IL 532-0314
LPC 8A 4/77

C700669

(NOT FOR DATA PROCESSING)

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

SAMPLE NUMBER : C700669
SAMPLING POINT DESC. : COOK-CHGO\AMERICAN DEMINERALIZER X206A

SUBMITTING SOURCE # : SITE # : 0316160003
DATE COLLECTED : 870208 TIME COLLECTED : 1200 SAMPLING PROGRAM :

COLLECTED BY : CAROLINE PANICO DELIVERED BY : CP
COMMENTS :
FUNDING CODE : LP41 AGENCY ROUTING : 00 UNIT CODE :
SAM TYPE CODE : LPEP SAMPLE PURPOSE CODE : D

DATE RECEIVED : 870209 TIME RECEIVED : 1430 RECEIVED BY : KGP
LAB OBSERVATIONS : REPORTING INDICATOR :
SUPERVISORS INITIALS : JWD NOTE : K = LESS THAN VALUE

A10000	PH/FINAL TOX EXT	UNITS :	5.0
A10000	PH/INITIAL TOX EX	UNITS :	7.9
A11600	CYANIDE/TOT.SW846	MG/KG :	855
A14400	ARSENIC/EP TOX.	MG/L :	0.01K
A14500	BARIUM/EP TOX	MG/L :	1.0
A14600	CADMIUM/EP TOX.	MG/L :	0.40
A14700	CHROMIUM/EP TOX.	MG/L :	0.525
A15100	LEAD/EP TOXICITY	MG/L :	0.07
A15300	MERCURY/EP TOX.	MG/L :	0.031
A15500	SELENIUM/EP TOX.	MG/L :	0.01K
A15600	SILVER/EP TOX.	MG/L :	.005K

RECEIVED
MAY 20 1987
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RECEIVED
APR 27 1987
EPA-DLPC

(1) Special
(2) Waste
(3) Other

Sampling Purpose 04

Program Code LP 41 Unit Code K

01 - Special Request
02 - Criminal enforcement
03 - Emergency response
04 - Routine Sampling

Time Collected: 12:05

Lab # C700670

SPECIAL ANALYSIS FORM

Date Collected: 2-6-87

Date Received 2-9-87

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF LAND/NOISE POLLUTION CONTROL

SAMPLE# X207 A

COUNTY: ~~Cook~~ Lake

FILE HEADING: Waukegan/Amerdec, Inc. ~~Chicago/American Demineralizer~~

FILE NUMBER: 0971900034 ~~0316060003~~

SOURCE OF SAMPLE: (Exact Location)

55 gallon drum behind the building at 90 Le Baron, Waukegan, Illinois (American Demineralizer's new location).

PHYSICAL OBSERVATIONS, REMARKS:

Coarse soil-like material with bright blue crystals

TESTS REQUESTED: E.P Toxicity for heavy metals, Total Cyanide

(SW 846 must be used)

COLLECTED BY: Caroline Panico

TRANSPORTED BY: (initials)

LABORATORY

RECEIVED BY: K. Patel

DATE COMPLETED: 2-30 Pm

DATE FORWARDED: APR. 24. 1987

J Daugherty

pH final 4.8 initial 4.7

CN - 240.7 mg/kg

As - <0.01

Ba - 0.2

Cd - 0.16

Cr - 0.19

Pb - <0.05

Hg - 0.003

Se - <0.5

Ag - <0.05

RECEIVED
MAY 20 1987
IEPA-DLPC

RESULTS EXPRESSED IN MG/LITER UNLESS OTHERWISE SPECIFIED.

RECEIVED
APR 27 1987

IL 532-0314
LPC 8A 4/77

C700670

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Environmental Protection Agency
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Chicago, Illinois 60612

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

SAMPLE NUMBER : C700870
SAMPLING POINT DESC. : COOK-CHGO\AMERICAN DEMINERALIZER X207A

SUBMITTING SOURCE # : SITE # : 0316160003
DATE COLLECTED : 870206 TIME COLLECTED : 1205 SAMPLING PROGRAM :

COLLECTED BY : CAROLINE PANICO DELIVERED BY : CP
COMMENTS :
FUNDING CODE : LP41 AGENCY ROUTING : 00 UNIT CODE :
SAM TYPE CODE : LPEP SAMPLE PURPOSE CODE : 0

DATE RECEIVED : 870209 TIME RECEIVED : 1430 RECEIVED BY : KGP
LAB OBSERVATIONS : REPORTING INDICATOR :
SUPERVISORS INITIALS : JWD NOTE : K = LESS THAN VALUE

A70000	PH,FINAL TOX EXT	UNITS :	4.8
A70000	PH,INITIAL TOX EX	UNITS :	4.7
A71000	CYANIDE,TOT.SW846	MG/KG :	240.7
A74400	ARSENIC,EP TOX.	MG/L :	0.01K
A74500	BARIUM,EP TOX	MG/L :	0.2
A74600	CADMIUM,EP TOX.	MG/L :	0.16
A74700	CHROMIUM,EP TOX.	MG/L :	0.19
A75100	LEAD,EP TOXICITY	MG/L :	0.05K
A75300	MERCURY,EP TOX.	MG/L :	0.003
A75500	SELENIUM,EP TOX.	MG/L :	0.5K
A75600	SILVER,EP TOX.	MG/L :	.005K

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RECEIVED
APR 27 1987
IEPA-DLPC

(X) Special
(1) Soil
(2) Waste
(3) Other

Sampling Purpose 04

Program Code LP 41 Unit Code K

01 - Special Request
02 - Criminal enforcement
03 - Emergency response
04 - Routine Sampling

Time Collected: 12:10

Date Collected: 2-6-87

SPECIAL ANALYSIS FORM

Lab # C700671

Date Received 2-9-87

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF LAND/NOISE POLLUTION CONTROL

SAMPLE# 2128A

COUNTY: Cook Lake

FILE HEADING: Waukegan/Amerdec, Inc. ~~Chicago/American Demineralizer~~

FILE NUMBER: 0971900034 ~~0316160003~~

SOURCE OF SAMPLE: (Exact Location)

55 gallon drum behind the building at 90 Le Baron, Waukegan, Illinois (American Demineralizer's new location).

PHYSICAL OBSERVATIONS, REMARKS:

Amber liquid

TESTS REQUESTED: E.P Toxicity for heavy metals, ~~Total Cyanide~~

(SW 846 must be used)

COLLECTED BY: John Maher

TRANSPORTED BY: (initials)

LABORATORY

RECEIVED BY: K. Patel 2:30 pm

DATE COMPLETED:

DATE FORWARDED: APR. 24 1987

pH 1.3

~~CN~~

As - interference

Ba - <0.1

Cd - 0.72 mg/L

Cr - 14,650,000 mg/L

Pb - 2.08 mg/L

Hg - 22.0 ug/l

Se - interference

Ag - <0.005

RECEIVED
MAY 20 1987
IEPA-DLPC

RESULTS EXPRESSED IN MG/LITER UNLESS OTHERWISE SPECIFIED.

IL 532-0314
LPC 8A 4/77

C700671

(NOT FOR DATA PROCESSING)

Environmental Protection Agency
Division of Laboratory Services
2121 W. Taylor Street
Chicago, Illinois 60612

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

SAMPLE NUMBER : C700671
SAMPLING POINT DESC. : COOK-CHGO\AMERICAN DEMINERALIZER X208A

SUBMITTING SOURCE # : SITE # : 0316160003
DATE COLLECTED : 870206 TIME COLLECTED : 1210 SAMPLING PROGRAM :

COLLECTED BY : JOHN MAHER DELIVERED BY : CP
COMMENTS :
FUNDING CODE : LP41 AGENCY ROUTING : 00 UNIT CODE :
SAM TYPE CODE : LPSP SAMPLE PURPOSE CODE : 0

DATE RECEIVED : 870209 TIME RECEIVED : 1430 RECEIVED BY : KGP
LAB OBSERVATIONS : REPORTING INDICATOR :
SUPERVISORS INITIALS : JWO NOTE : K = LESS THAN VALUE

A70000 PH/SW846 MET UNITS : 1.3
A14400 ARSENIC/SW846 MET UG/L :
002 : STRONG INTERFERENCES NO MEANINGFUL RESULT OBTAINABLE.
A14500 BARIUM/SW846 MET. UG/L : 100K

A14600 CADMIUM/SW846 MET UG/L : 720
A14700 CHROMIUM/SW846 MET UG/L : 1.5E07
A15100 LEAD/SW846 MET. UG/L : 2080
A15300 MERCURY/SW846 EQ. UG/L : 22.0

A15500 SELENIUM/SW846 MET UG/L :
002 : STRONG INTERFERENCES NO MEANINGFUL DATA OBTAINABLE
A15600 SILVER/SW846 MET. UG/L : 5K

RECEIVED
MAY 20 1987
IEPA-DLPC

RECEIVED
APR 27 1987
IEPA-DLPC

(1) Soil
(2) Waste
(3) Other

Sampling Purpose 04

Program Code LP 41 Unit Code K

01 - Special Request
02 - Criminal enforcement
03 - Emergency response
04 - Routine Sampling

Time Collected: 12:15

Date Collected: 2-6-87

SPECIAL ANALYSIS FORM

Lab # C700672

Date Received 2-9-87

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF LAND/NOISE POLLUTION CONTROL

SAMPLE# X 209A

COUNTY: ~~Cook~~ Lake

FILE HEADING: Waukegan/Amerdec, Inc. ~~Chicago/American Demineralizer~~

FILE NUMBER: 0971900034 ~~0316460003~~

SOURCE OF SAMPLE: (Exact Location)

55 gallon drum behind the building at 90 Le Baron, Waukegan, Illinois (American Demineralizer's new location).

PHYSICAL OBSERVATIONS, REMARKS:

Coarse soil-like material, light brown color, 1/2 inch wate

TESTS REQUESTED: E.P. Toxicity for heavy metals, Total Cyanide

(SW 846 must be used)

COLLECTED BY: Caroline Panico

TRANSPORTED BY: (initials)

LABORATORY

RECEIVED BY: K. Patel 2:30 pm

DATE COMPLETED:

DATE FORWARDED: APR. 24 1987

J. Daugherty

pH final 5.1 initial 6.0

CN - 455.4 mg/kg

As - <0.01

Ba - 0.6

Cd - 0.19

Cr - 0.12

Pb - <0.05

Hg - 0.0002

Se - <0.01

Ag - <0.005

RESULTS EXPRESSED IN MG/LITER UNLESS OTHERWISE SPECIFIED

RECEIVED
MAY 20 1987
IEPA-DLPC

APR 27 1987
IEPA-DLPC

IL 532-0314
LPC 8A 4/77

C700672

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Environmental Protection Agency
Division of Laboratory Services
2121 W. Taylor Street
Chicago, Illinois 60612

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

SAMPLE NUMBER : C700672
SAMPLING POINT DESC. : COOK-CHGO\AMERICAN DEMINERALIZER X209A

SUBMITTING SOURCE # : SITE # : 0316160003
DATE COLLECTED : 870206 TIME COLLECTED : 1215 SAMPLING PROGRAM :

COLLECTED BY : CAROLINE PANICO DELIVERED BY : CP
COMMENTS :
FUNDING CODE : LP41 AGENCY ROUTING : 00 UNIT CODE :
SAM TYPE CODE : LPEP SAMPLE PURPOSE CODE : 0

DATE RECEIVED : 870209 TIME RECEIVED : 1430 RECEIVED BY : KGP
LAB OBSERVATIONS : REPORTING INDICATOR :
SUPERVISORS INITIALS : JWO NOTE : K = LESS THAN VALUE

A10000	PH,FINAL TOX EXT	UNITS :	5.1
A10000	PH,INITIAL TOX EX	UNITS :	6.0
A11600	CYANIDE,TOT.SW846	MG/KG :	455.4
A14400	ARSENIC,EP TOX.	MG/L :	0.01K
A14500	BARIUM,EP TOX	MG/L :	0.6
A14600	CADMIUM,EP TOX.	MG/L :	0.19
A14700	CHROMIUM,EP TOX.	MG/L :	0.12
A15100	LEAD,EP TOXICITY	MG/L :	0.05K
A15300	MERCURY,EP TOX.	MG/L :	0.0002
A15500	SELENIUM,EP TOX.	MG/L :	0.01K
A15600	SILVER,EP TOX.	MG/L :	.005K

RECEIVED
MAY 20 1987
IEPA-DLPC

RECEIVED
APR 27 1987
IEPA-DLPC

(X) Special
(1) Soil
(2) Waste
(3) Other

Sampling Purpose 04

Program Code LP 41 Unit Code K

01 - Special Request
02 - Criminal enforcement
03 - Emergency response
04 - Routine Sampling

Lab # C700673

Time Collected: 12:30

Date Collected: 2-6-87

SPECIAL ANALYSIS FORM

Date Received 2-9-87

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF LAND/NOISE POLLUTION CONTROL

SAMPLE# X210 A

COUNTY: Cook Lake

FILE HEADING: Waukegan/Amerdec, Inc ~~Chicago/American Demineralizer~~

FILE NUMBER: 0971900034 ~~0316160003~~

SOURCE OF SAMPLE: (Exact Location)

55 gallon drum behind the building at 90 Le Baron, Waukegan, Illinois (American Demineralizer's new location).

PHYSICAL OBSERVATIONS, REMARKS:

Amber liquid

TESTS REQUESTED: E.P. Toxicity for heavy metals, Total Cyanide

(SW 846 must be used)

COLLECTED BY: Caroline Panico TRANSPORTED BY: (initials)

LABORATORY

RECEIVED BY: K. Patel 2:30 PM DATE COMPLETED: DATE FORWARDED APR. 24. 1987

J Daugherty

pH 0.6

~~CN~~ -

As - <0.5

Ba - <0.1 mg/l

Cd - 0.79 mg/L

Cr - 14,100 mg/l

Pb - 4.85 mg/L

Hg - 6.0 ug/l

Se - interference

Ag - <0.005

RESULTS EXPRESSED IN MG/LITER UNLESS OTHERWISE SPECIFIED

RECEIVED MAY 20 1987 IEPA-DLPC

RECEIVED APR 27 1987

Environmental Protection Agency
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2121 W. Taylor Street
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IL 532-0314
LPC 8A 4/77

C700673 (NOT FOR DATA PROCESSING)

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

SAMPLE NUMBER : C700673
SAMPLING POINT DESC. : COOK-CHGO\AMERICAN DEMINERALIZER X210A

SUBMITTING SOURCE # : SITE # : 0316160003
DATE COLLECTED : 870206 TIME COLLECTED : 1230 SAMPLING PROGRAM :

COLLECTED BY : CAROLINE PANICO DELIVERED BY : CP
COMMENTS :
FUNDING CODE : LP41 AGENCY ROUTING : 00 UNIT CODE :
SAM TYPE CODE : LPSP SAMPLE PURPOSE CODE : 0

DATE RECEIVED : 870209 TIME RECEIVED : 1430 RECEIVED BY : KGP
LAB OBSERVATIONS : REPORTING INDICATOR :
SUPERVISORS INITIALS : JWO NOTE : K = LESS THAN VALUE

A10000 PH/SW846 MET UNITS : 0.6
A14400 ARSENIC/SW846 MET UG/L : 500K
A14500 BARIUM/SW846 MET. UG/L : 100K
A14600 CADMIUM/SW846 MET UG/L : 790

A14700 CHROMIUM/SW846 MET UG/L : 1.5E07
A15100 LEAD/SW846 MET. UG/L : 4850
A15300 MERCURY/SW846 EQ. UG/L : 6.0
A15500 SELENIUM/SW846 MET UG/L :

002 : STRONG INTERFERENCES NO MEANINGFUL RESULTS OBTAINABLE
A15600 SILVER/SW846 MET. UG/L : 5K

RECEIVED
MAY 20 1987
IEPA-DLPC

RECEIVED
APR 27 1987
PC

(1) Soil (2) Waste (3) Other

Sampling Purpose 04

Program Code LP 41 Unit Code K

01 - Special Request
02 - Criminal enforcement
03 - Emergency response
04 - Routine Sampling

Time Collected: 12:40

Lab # C700674

SPECIAL ANALYSIS FORM

Date Collected: 2-6-87

Date Received 2-9-87

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF LAND/NOISE POLLUTION CONTROL

SAMPLE# X211A

COUNTY: ~~Cook~~ Lake

FILE HEADING: Waukegan / Amerdec, Inc ~~Chicago / American Demineralizer~~

FILE NUMBER: 0971900034 ~~0316110003~~

SOURCE OF SAMPLE: (Exact Location)

55 gallon drum behind the building at 90 Le Baron, Waukegan, Illinois (American Demineralizer's new location).

PHYSICAL OBSERVATIONS, REMARKS:

Amber liquid

TESTS REQUESTED: E.P. Toxicity for heavy metals, Total Cyanide

(SW 846 must be used)

COLLECTED BY: Caroline Panico

TRANSPORTED BY: (initials)

LABORATORY

RECEIVED BY: K. Patel 2:20 PM

DATE COMPLETED:

DATE FORWARDED: APR. 24 1987

J. Dougherty

pH	0.6
~~CN-~~	
As -	<0.5
Ba -	<0.1
Cd -	0.78 mg/L
Cr -	13,750 mg/L
Pb -	4.75 mg/L
Hg -	<2.0 ug/L
Se -	interference
Ag -	<0.005

~~RESULTS EXPRESSED IN MG/LITER UNLESS OTHERWISE SPECIFIED.~~

RECEIVED
~~MAY 30 1987~~
~~IEPA-DLPC~~

RECEIVED
APR 27 1987

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2121 W. Taylor Street
Chicago, Illinois 60612

IL 532-0314
LPC 8A 4/77

C700674

(NOT FOR DATA PROCESSING)

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

SAMPLE NUMBER : C700674
SAMPLING POINT DESC. : COOK-CHGO\AMERICAN DEMINERALIZER X211A

SUBMITTING SOURCE # : SITE # : 0316160003
DATE COLLECTED : 870206 TIME COLLECTED : 1240 SAMPLING PROGRAM :

COLLECTED BY : CAROLINE PANICO DELIVERED BY : CP
COMMENTS :
FUNDING CODE : LP41 AGENCY ROUTING : 00 UNIT CODE :
SAM TYPE CODE : LPSP SAMPLE PURPOSE CODE : 0

DATE RECEIVED : 870209 TIME RECEIVED : 1430 RECEIVED BY : KGP
LAB OBSERVATIONS : REPORTING INDICATOR :
SUPERVISORS INITIALS : JWD NOTE : K = LESS THAN VALUE

A10000 PH/SW846 MET UNITS : 0.6
A14400 ARSENIC/SW846 MET UG/L : 500K
A14500 BARIUM/SW846 MET. UG/L : 100K
A14600 CADMIUM/SW846 MET UG/L : 780

A14700 CHROMIUM/SW846 MET UG/L : 1.4E07
A15100 LEAD/SW846 MET. UG/L : 4750
A15300 MERCURY/SW846 EQ. UG/L : 2.0K
A15500 SELENIUM/SW846 MET UG/L :

J02 : STRONG INTERFERENCES NO MEANINGFUL RESULTS OBTAINABLE
A15600 SILVER/SW846 MET. UG/L : 5K

RECEIVED
MAY 20 1987
IEPA-DLPC

RECEIVED
APR 27 1987
IEPA-DLPC

(1) Soil
(2) Water
(3) Other

Sampling Purpose 04

Program Code LP 41 Unit Code K

01 - Special Request
02 - Criminal enforcement
03 - Emergency response
04 - Routine Sampling

Time Collected: 11:30

Date Collected: 2-6-87

SPECIAL ANALYSIS FORM

Lab # C700675

Date Received 2-9-87

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF LAND/NOISE POLLUTION CONTROL

SAMPLE # 201 B

COUNTY: Cook Lake

FILE HEADING: Waukegan / Amerdec, Inc ~~Chicago / American Demineralizer~~

FILE NUMBER: 0971900034 ~~0316160003~~

SOURCE OF SAMPLE: (Exact Location)

55 gallon drum behind the building at 90 Le Baron, Waukegan, Illinois (American Demineralizer's new location).

PHYSICAL OBSERVATIONS, REMARKS:

mixed filter paper and soil-like material

TESTS REQUESTED: E.P. Toxicity for heavy metals, Total Cyanide

(SW 846 must be used)

COLLECTED BY: John Maher

TRANSPORTED BY: (initials)

LABORATORY

RECEIVED BY: K. Patel 2:30 PM

DATE COMPLETED:

DATE FORWARDED: APR. 24. 1987

J Daugherty

CN - 50 mg/kg

As - <0.01

Ba - 0.3

Cd - 0.27

Cr - 0.15

Pb - 0.06

Hg - 0.003

Se - <0.05

Ag - <0.005

Initial pH 6.3
Final pH 5.1

RESULTS EXPRESSED IN MG/LITER UNLESS OTHERWISE SPECIFIED.

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C700675

APR 27 1987

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

SAMPLE NUMBER : C700675
SAMPLING POINT DESC. : COOK-CHGO\AMERICAN DEMINERALIZER X2018

SUBMITTING SOURCE # : SITE # : 0316160003
DATE COLLECTED : 870206 TIME COLLECTED : 1130 SAMPLING PROGRAM :

COLLECTED BY : JOHN MAHER DELIVERED BY : CP
COMMENTS :
FUNDING CODE : LP41 AGENCY ROUTING : 00 UNIT CODE :
SAM TYPE CODE : LPEP SAMPLE PURPOSE CODE : 0

DATE RECEIVED : 870209 TIME RECEIVED : 1430 RECEIVED BY : KGP
LAB OBSERVATIONS : REPORTING INDICATOR :
SUPERVISORS INITIALS : JWO NOTE : K = LESS THAN VALUE

A10000	PH,FINAL TOX EXT	UNITS :	5.1
A10000	PH,INITIAL TOX EX	UNITS :	6.3
A11600	CYANIDE,TOT.SW846	MG/KG :	50
A14400	ARSENIC,EP TOX.	MG/L :	0.07K
A14500	BARIUM,EP TOX	MG/L :	0.3
A14600	CADMIUM,EP TOX.	MG/L :	0.27
A14700	CHROMIUM,EP TOX.	MG/L :	0.15
A15100	LEAD,EP TOXICITY	MG/L :	0.06
A15300	MERCURY,EP TOX.	MG/L :	0.003
A15500	SELENIUM,EP TOX.	MG/L :	0.05K
A15600	SILVER,EP TOX.	MG/L :	.005K

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(X) Special
( ) Soil
(2) Waste
(3) Other

Sampling Purpose 04

Program Code LP 41 Unit Code K

01 - Special Request
02 - Criminal enforcement
03 - Emergency response
04 - Routine Sampling

Time Collected: 11:35

Lab # C700676

SPECIAL ANALYSIS FORM

Date Collected: 2-6-87

Date Received 2-9-87

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF LAND/NOISE POLLUTION CONTROL

SAMPLE# 202B

COUNTY: ~~Cook~~ Lake

FILE HEADING: Waukegan / Amerdec, Inc ~~Chicago / American Demineralizer~~

FILE NUMBER: 0971900034 ~~0314460003~~

SOURCE OF SAMPLE; (Exact Location)

55 gallon drum behind the building at 90 Le Baron, Waukegan, Illinois (American Demineralizer's new location).

PHYSICAL OBSERVATIONS, REMARKS:

coarse soil-like material with blue filter paper and liquid

TESTS REQUESTED: E.P. Toxicity for heavy metals, Total Cyanide (SW 846 must be used)

COLLECTED BY: Caroline Panico

TRANSPORTED BY: (initials)

LABORATORY

RECEIVED BY: K. Patel 2:30 PM

DATE COMPLETED:

DATE FORWARDED: APR. 24. 1987

J Daugherty

CN - 289.2 mg/kg

As - <0.01

Ba - 0.7

Cd - 0.35

Cr - 0.16

Pb - <0.05

Hg - 0.0004

Se - <0.01

Ag - <0.005

Initial pH 7.3
Final pH 5.1

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~~RESULTS EXPRESSED IN~~ MG/LITER UNLESS OTHERWISE SPECIFIED

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C700676

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ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

SAMPLE NUMBER : C700676
SAMPLING POINT DESC. : COOK-CHGO\AMERICAN DEMINERALIZER X2028

SUBMITTING SOURCE # : SITE # : 0316160003
DATE COLLECTED : 870206 TIME COLLECTED : 1135 SAMPLING PROGRAM :

COLLECTED BY : CAROLINE PANICO DELIVERED BY : CP
COMMENTS :
FUNDING CODE : LP41 AGENCY ROUTING : 00 UNIT CODE :
SAM TYPE CODE : LPEP SAMPLE PURPOSE CODE : 0

DATE RECEIVED : 870209 TIME RECEIVED : 1430 RECEIVED BY : KGP
LAB OBSERVATIONS : REPORTING INDICATOR :
SUPERVISORS INITIALS : JWO NOTE : K = LESS THAN VALUE

A10000	PH,FINAL TOX EXT	UNITS	: 5.1
A10000	PH,INITIAL TOX EX	UNITS	: 7.3
A11600	CYANIDE,TOT.SW846	MG/KG	: 289.2
A14400	ARSENIC,EP TOX.	MG/L	: 0.01K
A14500	BARIUM,EP TOX	MG/L	: 0.7
A14600	CADMIUM,EP TOX.	MG/L	: 0.35
A14700	CHROMIUM,EP TOX.	MG/L	: 0.16
A15100	LEAD,EP TOXICITY	MG/L	: 0.05K
A15300	MERCURY,EP TOX.	MG/L	: 0.0004
A15500	SELENIUM,EP TOX.	MG/L	: 0.01K
A15600	SILVER,EP TOX.	MG/L	: .005K

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(1) Special
(2) Waste
(3) Other

Sampling Purpose 04

01 - Special Request
02 - Criminal enforcement
03 - Emergency response
04 - Routine Sampling

Program Code LP 41 Unit Code K

Lab # C700677

Time Collected: 11:45

SPECIAL ANALYSIS FORM

Date Collected: 2-6-87

Date Received 2-9-87

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF LAND/NOISE POLLUTION CONTROL

SAMPLE# X203B

COUNTY: Cook Lab

FILE HEADING: Waukegan/Amerdec, Inc ~~Chicago/American Demineralizer~~

FILE NUMBER: 0971900034 ~~0311160003~~

SOURCE OF SAMPLE: (Exact Location)

55 gallon drum behind the building at 90 Le Baron, Waukegan, Illinois (American Demineralizer's new location).

PHYSICAL OBSERVATIONS, REMARKS:

Coarse salt like material with brown filter paper

TESTS REQUESTED: E.P. Toxicity for heavy metals, Total Cyanide

(SW 846 must be used)

COLLECTED BY: John Maher

TRANSPORTED BY: (initials)

LABORATORY

RECEIVED BY: K. Patel 2:30 pm

DATE COMPLETED:

DATE FORWARDED: APR. 24, 1987

J Daugherty

CN - 204.5 mg/kg

As - <0.01

Ba - 1.8

Cd - 0.27

Cr - 0.04

Pb - <0.05

Hg - 0.0004

Se - <0.5

Ag - <0.005

Initial pH 5.1
Final pH 9.5

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RESULTS EXPRESSED IN MG/LITER UNLESS OTHERWISE SPECIFIED.

APR 27 1987

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C700677

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

SAMPLE NUMBER : C700677
SAMPLING POINT DESC. : COOK-CHGO\AMERICAN DEMINERALIZER X2038

SUBMITTING SOURCE # : SITE # : 0316160003
DATE COLLECTED : 870206 TIME COLLECTED : 1145 SAMPLING PROGRAM :

COLLECTED BY : JOHN MAHER DELIVERED BY : CP
COMMENTS :
FUNDING CODE : LP41 AGENCY ROUTING : OD UNIT CODE :
SAM TYPE CODE : LPEP SAMPLE PURPOSE CODE : 0

DATE RECEIVED : 870209 TIME RECEIVED : 1430 RECEIVED BY : KGP
LAB OBSERVATIONS : REPORTING INDICATOR :
SUPERVISORS INITIALS : JWD NOTE : K = LESS THAN VALUE

A10000	PH,FINAL TOX EXT	UNITS :	5.1
A10000	PH,INITIAL TOX EX	UNITS :	9.5
A11600	CYANIDE,TOT.SW846	MG/KG :	204.5
A14400	ARSENIC,EP TOX.	MG/L :	0.01K
A14500	BARIUM,EP TOX	MG/L :	1.8
A14600	CADMIUM,EP TOX.	MG/L :	0.27
A14700	CHROMIUM,EP TOX.	MG/L :	0.04
A15100	LEAD,EP TOXICITY	MG/L :	0.05K
A15300	MERCURY,EP TOX.	MG/L :	0.0004
A15500	SELENIUM,EP TOX.	MG/L :	0.5K
A15600	SILVER,EP TOX.	MG/L :	.005K

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APR 27 1987
IEPA-DLPC

(X) Special
(1) Soil
(2) Waste
(3) Other

Sampling Purpose 04

01 - Special Request
02 - Criminal enforcement
03 - Emergency response
04 - Routine Sampling

Program Code LP 41 Unit Code K

Time Collected: 11:50

Date Collected: 2-6-87

SPECIAL ANALYSIS FORM

Lab # C700678

Date Received ~~K Patel~~ 2-9-87

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF LAND/NOISE POLLUTION CONTROL

SAMPLE# X204B

COUNTY: Cook Lake

FILE HEADING: Waukegan/Amerdec, Inc ~~Chicago/American Demineralizer~~

FILE NUMBER: 0971900034 ~~0316660003~~

SOURCE OF SAMPLE: (Exact Location)

55 gallon drum behind the building at 90 Le Baron, Waukegan, Illinois (American Demineralizer's new location).

PHYSICAL OBSERVATIONS, REMARKS:

Coarse soil-like material with blue-green particles.

TESTS REQUESTED: E.P. Toxicity for heavy metals, Total Cyanide (SW 846 must be used)

COLLECTED BY: Caroline Panico

TRANSPORTED BY: (initials)

LABORATORY

RECEIVED BY: K. Patel 2-30PM

DATE COMPLETED:

DATE FORWARDED: APR. 24 1987

J Dougherty

Initial pH 8.0
Final pH 4.8

CN - 325 mg/kg
As - <0.01
Ba - 1.8
Cd - 0.55
Cr - 0.390
Pb - 0.12
Hg - 0.0003
Se - <0.01
Ag - <0.005

RECEIVED
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IEPA-DLPC

RESULTS EXPRESSED IN MG/LITER UNLESS OTHERWISE SPECIFIED.

APR 27 1987

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C700678

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ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

SAMPLE NUMBER : C700678
SAMPLING POINT DESC. : COOK-CHGO\AMERICAN DEMINERALIZER X2048

SUBMITTING SOURCE # : SITE # : 0316160003
DATE COLLECTED : 870206 TIME COLLECTED : 1150 SAMPLING PROGRAM :

COLLECTED BY : CAROLINE PANICO DELIVERED BY : CP
COMMENTS :
FUNDING CODE : LP41 AGENCY ROUTING : 00 UNIT CODE :
SAM TYPE CODE : LPEP SAMPLE PURPOSE CODE : 0

DATE RECEIVED : 870209 TIME RECEIVED : 1430 RECEIVED BY : KGP
LAB OBSERVATIONS : REPORTING INDICATOR :
SUPERVISORS INITIALS : JWD NOTE : K = LESS THAN VALUE

A70000	PH/FINAL TOX EXT	UNITS :	4.8
A70000	PH/INITIAL TOX EX	UNITS :	8.0
A71600	CYANIDE/TOT.SW846	MG/KG :	325
A74400	ARSENIC/EP TOX.	MG/L :	0.01K
A74500	BARIUM/EP TOX	MG/L :	1.8
A74600	CADMIUM/EP TOX.	MG/L :	0.55
A74700	CHROMIUM/EP TOX.	MG/L :	0.390
A75100	LEAD/EP TOXICITY	MG/L :	0.12
A75300	MERCURY/EP TOX.	MG/L :	0.0003
A75500	SELENIUM/EP TOX.	MG/L :	0.01K
A75600	SILVER/EP TOX.	MG/L :	.005K

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APR 27 1987
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X) Special
(1) Soil
(2) Waste
(3) Other

Sampling Purpose 04

Program Code LP 41 Unit Code K

01 - Special Request
02 - Criminal enforcement
03 - Emergency response
04 - Routine Sampling

Time Collected: 13:00

Lab # C700679

SPECIAL ANALYSIS FORM

Date Collected: 2-6-87

Date Received 2-9-87

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF LAND/NOISE POLLUTION CONTROL

SAMPLE# 305 B

COUNTY: Cook Lake

FILE HEADING: Waukegan/Amerdec, Inc. ~~Chicago/American Demineralizer~~

FILE NUMBER: 0971900034 ~~0316110003~~

SOURCE OF SAMPLE: (Exact Location)

55 gallon drum behind the building at 90 Le Baron, Waukegan, Illinois (American Demineralizer's new location).

PHYSICAL OBSERVATIONS, REMARKS:

Coarse soil-like material with filter paper.

TESTS REQUESTED: E.P. Toxicity for heavy metals, Total Cyanide

(SW 846 must be used)

COLLECTED BY: John Maher

TRANSPORTED BY: (initials)

LABORATORY

RECEIVED BY: K. Patel 2:30 Pm

DATE COMPLETED:

DATE FORWARDED: APR. 24. 1987

J Dougherty

Initial pH 7.2
Final pH 5.2

CN - 219.6 mg/kg
As - <0.01
Ba - 0.3
Cd - 0.65
Cr - 0.065
Pb - 0.18
Hg - 0.0005
Se - <0.05
Ag - <0.005

RECEIVED
MAY 20 1987
IEPA-DLPC

RESULTS EXPRESSED IN MG/LITER UNLESS OTHERWISE SPECIFIED

RECEIVED
APR 27 1987
IEPA-DLPC

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(NOT FOR DATA PROCESSING)

C700679

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ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

SAMPLE NUMBER : C700679
SAMPLING POINT DESC. : COOK-CHGO\AMERICAN DEMINERALIZER 205B

SUBMITTING SOURCE # : SITE # : 0316160003
DATE COLLECTED : 870206 TIME COLLECTED : 1200 SAMPLING PROGRAM :

COLLECTED BY : JOHN MAHER DELIVERED BY : CP
COMMENTS :
FUNDING CODE : LP41 AGENCY ROUTING : 00 UNIT CODE :
SAM TYPE CODE : LPEP SAMPLE PURPOSE CODE : 0

DATE RECEIVED : 870209 TIME RECEIVED : 1430 RECEIVED BY : KGP
LAB OBSERVATIONS : REPORTING INDICATOR :
SUPERVISORS INITIALS : JWD NOTE : K = LESS THAN VALUE

A10000	PH,FINAL TOX EXT	UNITS	: 5.2
A10000	PH,INITIAL TOX EX	UNITS	: 7.2
A11600	CYANIDE,TOT.SW846	MG/KG	: 219.6
A14400	ARSENIC,EP TOX.	MG/L	: 0.01K
A14500	BARIUM,EP TOX	MG/L	: 0.3
A14600	CADMIUM,EP TOX.	MG/L	: 0.65
A14700	CHROMIUM,EP TOX.	MG/L	: 0.065
A15100	LEAD,EP TOXICITY	MG/L	: 0.18
A15300	MERCURY,EP TOX.	MG/L	: 0.0005
A15500	SELENIUM,EP TOX.	MG/L	: 0.05K
A15600	SILVER,EP TOX.	MG/L	: .005K

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RECEIVED
APR 27 1987

(X) Soil
(_) Soil
(2) Waste
(3) Other

Sampling Purpose 04

Program Code LP 41 Unit Code K

01 - Special Request
02 - Criminal enforcement
03 - Emergency response
04 - Routine Sampling

Time Collected: 12:00

Lab # C700680

SPECIAL ANALYSIS FORM

Date Collected: 2-6-87

Date Received 2-9-87

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF LAND/NOISE POLLUTION CONTROL

SAMPLE# X2062B

COUNTY: ~~Cook~~ Lake

FILE HEADING: Waukegan/Amerdec, Inc ~~Chicago/American Demineralizer~~

FILE NUMBER: 0971900034 ~~0316660003~~

SOURCE OF SAMPLE: (Exact Location)

55 gallon drum behind the building at 90 Le Baron, Waukegan, Illinois (American Demineralizer's new location).

PHYSICAL OBSERVATIONS, REMARKS:

Coarse soil-like material with blue particles.

TESTS REQUESTED: E.P. Toxicity for heavy metals, Total Cyanide (SW 846 must be used)

COLLECTED BY: Caroline Panico

TRANSPORTED BY: (initials)

LABORATORY

RECEIVED BY: K. Patel 2:30 PM

DATE COMPLETED:

DATE FORWARDED: APR. 24. 1987

J Daugherty

Initial pH 7.6

Final pH 4.9

CN - 847 mg/kg

As - <0.01

Ba - 0.6

Cd - 0.355

Cr - 0.45

Pb - 0.07

Hg - 0.025

Se - <0.01

Ag - <0.005

~~RECEIVED~~
~~MAY 20 1987~~
~~IEPA-DLPC~~

~~RESULTS EXPRESSED IN~~
MG/LITER UNLESS
OTHERWISE SPECIFIED

RECEIVED
APR 27 1987
IEPA-DLPC

IL 532-0314
LPC 8A 4/77

C700680

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Chicago, Illinois 60612

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

SAMPLE NUMBER : C700680
SAMPLING POINT DESC. : COOK-CHGO\AMERICAN DEMINERALIZER X2068

SUBMITTING SOURCE # : SITE # : 0316160003
DATE COLLECTED : 870206 TIME COLLECTED : 1200 SAMPLING PROGRAM :

COLLECTED BY : CAROLINE PANICO DELIVERED BY : CP
COMMENTS :
FUNDING CODE : LP41 AGENCY ROUTING : OD UNIT CODE :
SAM TYPE CODE : LPEP SAMPLE PURPOSE CODE : 0

DATE RECEIVED : 870209 TIME RECEIVED : 1430 RECEIVED BY : KGP
LAB OBSERVATIONS : REPORTING INDICATOR :
SUPERVISORS INITIALS : JWD NOTE : K = LESS THAN VALUE

A10000	PH/FINAL TOX EXT	UNITS :	4.9
A10000	PH/INITIAL TOX EX	UNITS :	7.6
A11600	CYANIDE/TOT.SW846	MG/KG :	847
A14400	ARSENIC/EP TOX.	MG/L :	0.01K
A14500	BARIUM/EP TOX	MG/L :	0.6
A14600	CADMIUM/EP TOX.	MG/L :	0.36
A14700	CHROMIUM/EP TOX.	MG/L :	0.45
A15100	LEAD/EP TOXICITY	MG/L :	0.07
A15300	MERCURY/EP TOX.	MG/L :	0.025
A15500	SELENIUM/EP TOX.	MG/L :	0.01K
A15600	SILVER/EP TOX.	MG/L :	.005K

RECEIVED
MAY 20 1987
IEPA-DLPC

RECEIVED
APR 27 1987
IEPA-DLPC

RECEIVED

(X) Special
(1) Soil
(2) Waste
(3) Other

Sampling Purpose 04

Program Code LP 41 Unit Code K

01 - Special Request
02 - Criminal enforcement
03 - Emergency response
04 - Routine Sampling

Time Collected: 12:05

Lab # C700681

SPECIAL ANALYSIS FORM

Date Collected: 2-6-87

Date Received 2-9-87

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF LAND/NOISE POLLUTION CONTROL

SAMPLE# X207 B

COUNTY: Cook Lake

FILE HEADING: Waukegan/Amerdec, Inc. ~~Chicago/American Demineralizer~~

FILE NUMBER: 0971900034 ~~0316660003~~

SOURCE OF SAMPLE: (Exact Location)

55 gallon drum behind the building at 90 Le Baron, Waukegan, Illinois (American Demineralizer's new location).

PHYSICAL OBSERVATIONS, REMARKS:

Coarse soil-like material with bright blue crystals

TESTS REQUESTED: E.P. Toxicity for heavy metals, Total Cyanide

(SW 846 must be used)

COLLECTED BY: Caroline Panice

TRANSPORTED BY: (initials)

LABORATORY

RECEIVED BY: K. Patel 2:30 PM

DATE COMPLETED:

DATE FORWARDED APR. 24 1987

J Daugherty

CN - 197.5 mg/kg

As - <0.01

Ba - 0.2

Cd - 0.135

Cr - 0.22

Pb - <0.05

Hg - 0.009

Se - <0.05

Ag - <0.005

Initial pH 4.8
Final pH 4.7

RECEIVED
MAY 20 1987
IEPA-DLPC

RESULTS EXPRESSED IN MG/LITER UNLESS OTHERWISE SPECIFIED.

RECEIVED
APR 27 1987

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C700681

(NOT FOR DATA PROCESSING)

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

SAMPLE NUMBER : C700681
SAMPLING POINT DESC. : COOK-CHGO\AMERICAN DEMINERALIZER X2078

SUBMITTING SOURCE # : SITE # : 0316160003
DATE COLLECTED : 870206 TIME COLLECTED : 1205 SAMPLING PROGRAM :

COLLECTED BY : CAROLINE PANICO DELIVERED BY : CP
COMMENTS :
FUNDING CODE : LP41 AGENCY ROUTING : 00 UNIT CODE :
SAM TYPE CODE : LPEP SAMPLE PURPOSE CODE : 0

DATE RECEIVED : 870209 TIME RECEIVED : 1430 RECEIVED BY : KGP
LAB OBSERVATIONS : REPORTING INDICATOR :
SUPERVISORS INITIALS : JWD NOTE : K = LESS THAN VALUE

A10000	PH,FINAL TOX EXT	UNITS :	4.7
A10000	PH,INITIAL TOX EX	UNITS :	4.8
A11600	CYANIDE,TOT.SW846	MG/KG :	197.5
A14400	ARSENIC,EP TOX.	MG/L :	0.01K
A14500	BARIUM,EP TOX	MG/L :	0.2
A14600	CADMIUM,EP TOX.	MG/L :	0.14
A14700	CHROMIUM,EP TOX.	MG/L :	0.22
A15100	LEAD,EP TOXICITY	MG/L :	0.05K
A15300	MERCURY,EP TOX.	MG/L :	0.009
A15500	SELENIUM,EP TOX.	MG/L :	0.05K
A15600	SILVER,EP TOX.	MG/L :	.005K

RECEIVED
MAY 20 1987
IEPA-DLPC

RECEIVED
APR 27 1987
IEPA-DLPC

(X) Special
(1) Soil
(2) Waste
(3) Other

Sampling Purpose 04

01 - Special Request
02 - Criminal enforcement
03 - Emergency response
04 - Routine Sampling

Program Code LP 41 Unit Code K

Lab # C700682

Time Collected: 12:10

SPECIAL ANALYSIS FORM

Date Collected: 2-6-87

Date Received 2-9-87

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF LAND/NOISE POLLUTION CONTROL

SAMPLE# X208B

COUNTY: Cook Lake

FILE HEADING: Waukegan/Amerdec, Inc. ~~Chicago/American Demineralizer~~

FILE NUMBER: 0971900034 ~~0316660003~~

SOURCE OF SAMPLE: (Exact Location)

55 gallon drum behind the building at 90 Le Baron, Waukegan, Illinois (American Demineralizer's new location).

PHYSICAL OBSERVATIONS, REMARKS:

Amber liquid

TESTS REQUESTED: E.P. Toxicity for heavy metals, Total Cyanide

(SW 846 must be used)

COLLECTED BY: John Maher

TRANSPORTED BY: (initials)

LABORATORY

RECEIVED BY: K. Patel 2:30 PM

DATE COMPLETED:

DATE FORWARDED: APR. 24. 1987

J Daugherty

pH	1.3
CN-	
As -	< 0.05
Ba -	< 0.1
Cd -	0.61 mg/L
Cr -	17,300 mg/L
Pb -	2.00 mg/L
Hg -	30.0 ug/L
Se -	< 0.5
Ag -	< 0.005

RECEIVED
MAY 30 1987
IEPA-DLPC

RESULTS EXPRESSED IN MG/LITER UNLESS OTHERWISE SPECIFIED.

RECEIVED
APR 27 1987
(NOT FOR DATA PROCESSING)

IL 532-0314
LPC 8A 4/77

C700682

Environmental Protection Agency
Division of Laboratory Services
2121 W. Taylor Street
Chicago, Illinois 60612

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

SAMPLE NUMBER : C700682
SAMPLING POINT DESC. : COOK-CHGO\AMERICAN DEMINERALIZER X208B

SUBMITTING SOURCE # : SITE # : 0316160003
DATE COLLECTED : 870206 TIME COLLECTED : 1210 SAMPLING PROGRAM :

COLLECTED BY : JOHN MAHER DELIVERED BY : CP
COMMENTS :
FUNDING CODE : LP41 AGENCY ROUTING : 00 UNIT CODE :
SAM TYPE CODE : LPSP SAMPLE PURPOSE CODE : 0

DATE RECEIVED : 870207 TIME RECEIVED : 1430 RECEIVED BY : KGP
LAB OBSERVATIONS : REPORTING INDICATOR :
SUPERVISORS INITIALS : JWO NOTE : K = LESS THAN VALUE

A10000	PH/SW846 MET	UNITS	: 1.3
A14400	ARSENIC/SW846 MET	UG/L	: 50K
A14500	BARIUM/SW846 MET.	UG/L	: 100K
A14600	CADMIUM/SW846 MET	UG/L	: 610
A14700	CHROMIUM/SW846 MET	UG/L	: 1.2E07
A15100	LEAD/SW846 MET.	UG/L	: 2000
A15300	MERCURY/SW846 EQ.	UG/L	: 30.0
A15500	SELENIUM/SW846 MET	UG/L	: 500K
A15600	SILVER/SW846 MET.	UG/L	: 5K

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(1) Soil
(2) Waste
(3) Other

Sampling Purpose 04

Program Code LP 41 Unit Code K

01 - Special Request
02 - Criminal enforcement
03 - Emergency response
04 - Routine Sampling

Time Collected: 12:15

Date Collected: 2-6-87

SPECIAL ANALYSIS FORM

Lab # C700683

Date Received 2-9-87

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF LAND/NOISE POLLUTION CONTROL

SAMPLE# X209B

COUNTY: ~~Cook~~ Lake

FILE HEADING: Waukegan/Amerdec, Inc. ~~Chicago/American Demineralizer~~

FILE NUMBER: 0971900034 ~~0316060003~~

SOURCE OF SAMPLE: (Exact Location)

55 gallon drum behind the building at 90 Le Baron, Waukegan, Illinois (American Demineralizer's new location).

PHYSICAL OBSERVATIONS, REMARKS:

Coarse soil-like material, brown color

TESTS REQUESTED: E.P. Toxicity for heavy metals, Total Cyanide

(SW 846 must be used)

COLLECTED BY: Caroline Panico

TRANSPORTED BY: (initials)

LABORATORY

RECEIVED BY: K. Eatel 2:30 pm

DATE COMPLETED:

DATE FORWARDED: APR. 24. 1987

J Dougherty

Initial pH 6.3

Final pH 5.2

CN - 467.2 mg/kg

As - <0.01

Ba - 0.6

Cd - 0.200

Cr - 0.04

Pb - <0.05

Hg - 0.0005

Se - <0.01

Ag - <0.005

RESULTS EXPRESSED IN MG/LITER UNLESS ~~OTHERWISE SPECIFIED~~

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IL 532-0314
LPC 8A 4/77

(NOT FOR DATA PROCESSING)

Environmental Protection Agency
Division of Laboratory Services
2121 W. Taylor Street
Chicago, Illinois 60612

C700683

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

SAMPLE NUMBER : C700683
SAMPLING POINT DESC. : COOK-CHGO\AMERICAN DEMINERALIZER X2098

SUBMITTING SOURCE # : SITE # : 0316160003
DATE COLLECTED : 870206 TIME COLLECTED : 1215 SAMPLING PROGRAM :

COLLECTED BY : CAROLINE PANICO DELIVERED BY : CP
COMMENTS :
FUNDING CODE : LP41 AGENCY ROUTING : 00 UNIT CODE :
SAM TYPE CODE : LPEP SAMPLE PURPOSE CODE : 0

DATE RECEIVED : 870209 TIME RECEIVED : 1430 RECEIVED BY : KGP
LAB OBSERVATIONS : REPORTING INDICATOR :
SUPERVISORS INITIALS : JWD NOTE : K = LESS THAN VALUE

A70000	PH,FINAL TOX EXT	UNITS :	5.2
A70000	PH,INITIAL TOX EX	UNITS :	6.3
A71600	CYANIDE,TOT.SW846	MG/KG :	467.2
A74400	ARSENIC,EP TOX.	MG/L :	0.01K
A74500	BARIUM,EP TOX	MG/L :	0.6
A74600	CADMIUM,EP TOX.	MG/L :	0.20
A74700	CHROMIUM,EP TOX.	MG/L :	0.04
A75100	LEAD,EP TOXICITY	MG/L :	0.05K
A75300	MERCURY,EP TOX.	MG/L :	0.0005
A75500	SELENIUM,EP TOX.	MG/L :	0.01K
A75600	SILVER,EP TOX.	MG/L :	.005K

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STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY
INSPECTION REPORT

USEPA Number: Non-notifier IEPA Number: 0971900034

Facility Name: Amerdec, Inc.

Street: 90 Le Baron
City: Waukegan Telephone: 312/623-6650
County: Lake State: IL Zip Code: 60085

Type of Facility: Notified As: Non-notifier Regulated As: Tr. S
LDF? yes __ no X HPV? yes X no __ 90 Day Follow-up Required? yes X no __

Region: 2 Date of Inspection: 1-29-87 / 2-18-87 From: 9:30am / 9:00am to 10:30am / 10:10am
Weather (LDF Only): _____

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

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

Notified As/Regulated As Matrix Number: 52 Key Letter: F

Notification date, N/A, from initial __ or subsequent __ notification.

Part A date, N/A, from initial __ or amended __ Part A.

Part B permit application submitted? yes __ no X

Has the firm been referred to: USEPA? yes __ no X; IAG? yes __ no X; County States Attorney? yes __ no X. Date of referral to USEPA: _____, IAG: _____, County States Attorney: _____.

Federal Court Order Issued: _____ State Court Order Issued: _____

USEPA Compliance Order Issued: _____ Illinois PCB Order Issued: _____

TSD Facility Activity Summary

Activity(By Process Code)	On Pt A	Activity Conducted Prior to 1980	Was Activity Ever Done	Closed	Being Done at Time of Inspection	Exempt From Regulation per 35 IAC, Section:	On Annual Report For 84	85	86
S01	No Part A	No	YES	No	YES	N/A	N/A	N/A	No A.R.

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Operator: Amerdec, Inc. Telephone #: 312/623-6650

Street: 90 Le Baron

City: Waukegan State: IL Zip Code: 60085

Owner: Mark I and a Joint Venture Telephone #:

Street: 465 Evanston

City: Lake Bluff State: IL Zip Code: 60044

Person Interviewed	Title	Telephone #
Thomas Allegretti	Manager	312/623-6650
Magie Allegretti	President	312/623-6650

Inspection Participants	Agency/Title	Telephone #
John Maher	IEPA/EPS 1	312/345-9780

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Prepared By	Agency/Title	Telephone #
John Maher	IEPA/EPS 1	312/345-9780

Summary of Apparent Violations

Area	Class	Section
Other	1	703.121
Other	1	723.111
Other	1	723.112
MAN	1	723.120
Other	1	724.111
Other	1	724.113
Other	1	724.114
Other	2	724.115
Other	1	724.131
Other	1	724.135
Other	2	724.137
Other	1	724.151
Other	2	724.153
Other	2	724.173
Other	2	724.175
Other	1	724.176
CLO	1	724.212
FIN	1	724.242
Other	1	724.271
Other	1	724.273
Other	2	724.274

Other 1 724.112(a) GB 4/7/87

WASTE DISPOSITION FORM

Facility Name: Amerdec, Inc. USEPA #: Non-notifier IEPA #: 0971900034

Waste Name (Include haz & non-haz special & waste for which no determination has been made)	Generating Process (For waste gen. on site. N/A for TSD)	Date of Last Analysis	USEPA Haz Waste #	On 8700-12 *	On 3510-3 *	On Annual Rpt For 84 *	85 *	86 *	Amount On Site	Rate of Generation	Last Manifested Shipment	Dispsition
Spent Chrome Solution	Acquired from a plater's plating tank.	Not Available	D007 (F007 ?)	Non-Notifier	No Part A	N/A	N/A	No A.R.	3 drums	Not currently generated	Never Disposed	N/A
Index Filter Waste	Regenerating resins at former site (4425 W. Montrose, Chicago)	"	F006 (D007 ?)	"	"	"	"	"	9 drums	"	"	"
Unknown Aqueous Waste	Unknown	"	Unknown	"	"	"	"	"	5 drums	"	"	"
Spent Resins	Removing resins from used ion exchange columns (Generated at 4425 W. Montrose, Chicago)	"	F006 (D007 ?)	"	"	"	"	"	~ 300 Gallons	"	"	"

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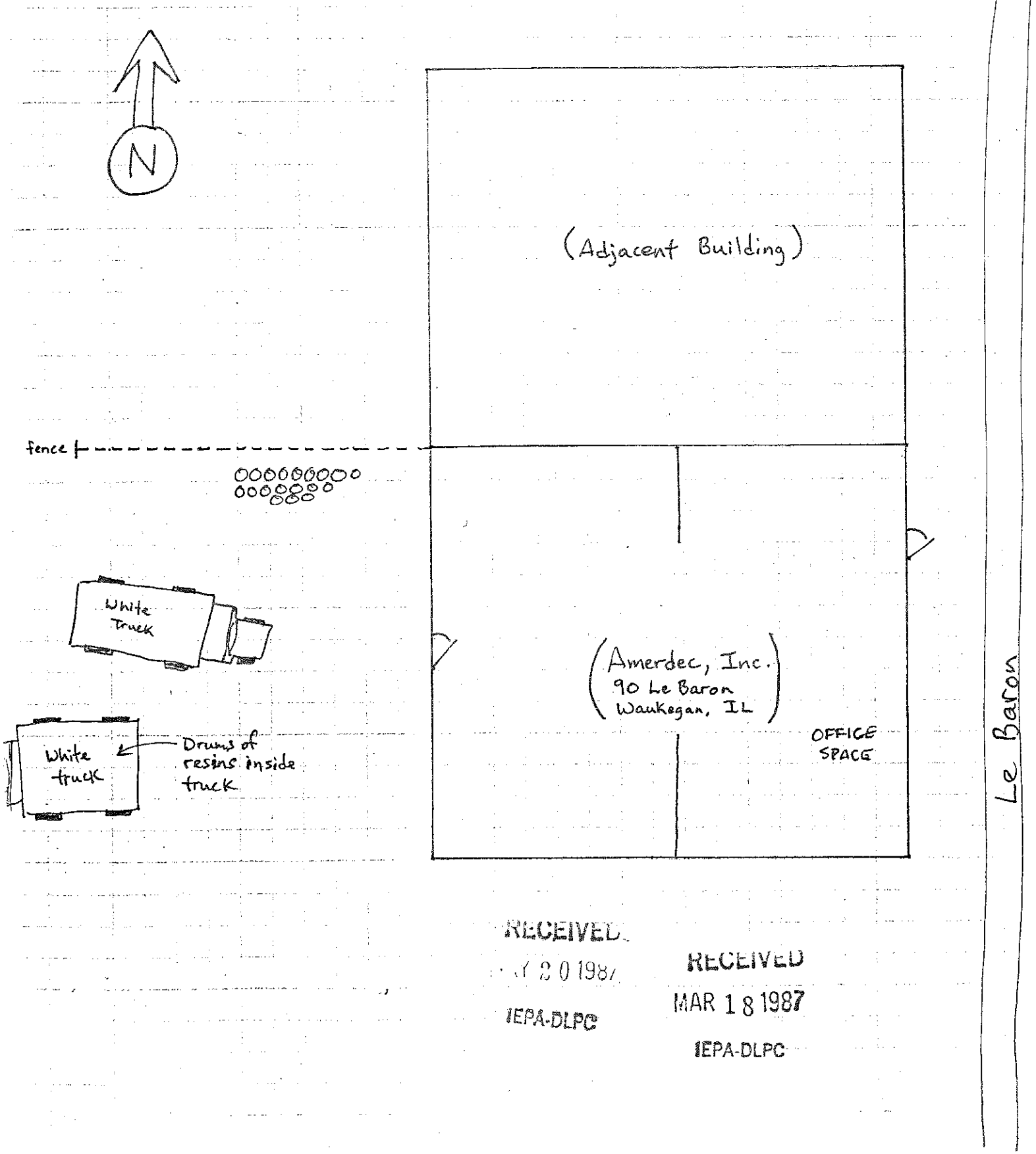
* All "no" responses must be explained in the narrative

Facility Name: Amerdec, Inc.

USEPA Number: Non-notifier IEPA Number: 0971900034

Sketch of Site: ___Accumulation Area(s) ___Treatment Area(s) ___Storage Area(s)

___Disposal Area(s) X Entire Site



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NARRATIVE

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merdec, Inc. was formed April 23, 1986. Amerdec is being operated by the same individuals that had operated American Demineralizer (i.e., Tom and Magie Allegretti). In November, 1986, Amerdec moved from their former location (4425 W. Montrose, Chicago) to their present location. Amerdec's operation is essentially the same as that of American Demineralizer's operation, with one exception. American Demineralizer's operation consisted of two activities: 1) they sold filter cartridges, ion exchange columns and the equipment necessary to utilize these filters; and 2) they picked up their customers' used ion exchange columns. (Eventually they regenerated the resins in those columns.) Amerdec's operation involves only the first activity; they do not take back anything from their customers.

American Demineralizer's customers (i.e., electroplaters) used these ion exchange columns to treat their wastewater prior to its discharge. The contaminants on the resins in these columns are, collectively, a wastewater treatment sludge from electroplating operations - a listed hazardous waste (F006). One of the first activities in regenerating these resins involved backflushing the columns. The sludge generated by this activity was trapped on index filters. This index filter waste (filter paper included) was placed in drums. Though Amerdec does not engage in the regeneration activity, several drums that Amerdec transported to their present site contain this index filter waste. Also transported were several drums of spent resins and several drums of spent chrome solution. Consequently, Amerdec is a transporter and storage facility of hazardous waste.

At the time of the inspection, the following apparent violations were observed:

703.121 - Conducting hazardous waste storage without interim status or a RCRA permit.

NARRATIVE

23.111 - No USEPA identification number.

723.112 - Transported waste has been stored over ten days at the site and in containers that do not meet the packaging requirements of 722.130.

723.120 - Waste was accepted from the generator without a manifest.

724.111 - No USEPA Identification number.

724.113 - No waste analyses.

- No waste analysis plan.

724.114 - Waste storage area is not secure from unauthorized entry.

-A sign with the legend "Danger - Unauthorized Personnel Keep Out" is not posted near the storage area.

724.115 - Inspections of the facility are not conducted.

- No inspection schedule.

- No inspection log.

724.131 - Facility is not maintained to minimize hazardous situations affecting the environment or human health; specifically, drums of waste are being stored without tops.

724.135 - Inadequate aisle space.

724.137 - Arrangements have not been made with local authorities regarding emergency assistance.

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724.151 - No contingency plan.

724.153 - No contingency plan sent to local emergency organizations.

724.173 - No operating record.

724.175 - Facility Annual Report has not been submitted to the Agency.

724.176 - Unmanifested waste report has not been submitted to the Agency.

724.212 - No closure plan.

/24.242 - No closure cost estimate.

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724.271 - Container X208 of hazardous waste was leaking.

NARRATIVE

?4.273 - Several containers were being stored open.

724.274 - Inspections of containers are not conducted.

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Date: 1-29-87

Time: 9:30-10:30 (A.M.) P.M.

Photograph By:

John Maher

Location:

0971900034 - Lake Co.

Waukegan / Amerdec

Comments: Photograph taken toward the North.

Date: 1-29-87

Time: 9:30-10:30 (A.M.) P.M.

Photograph By:

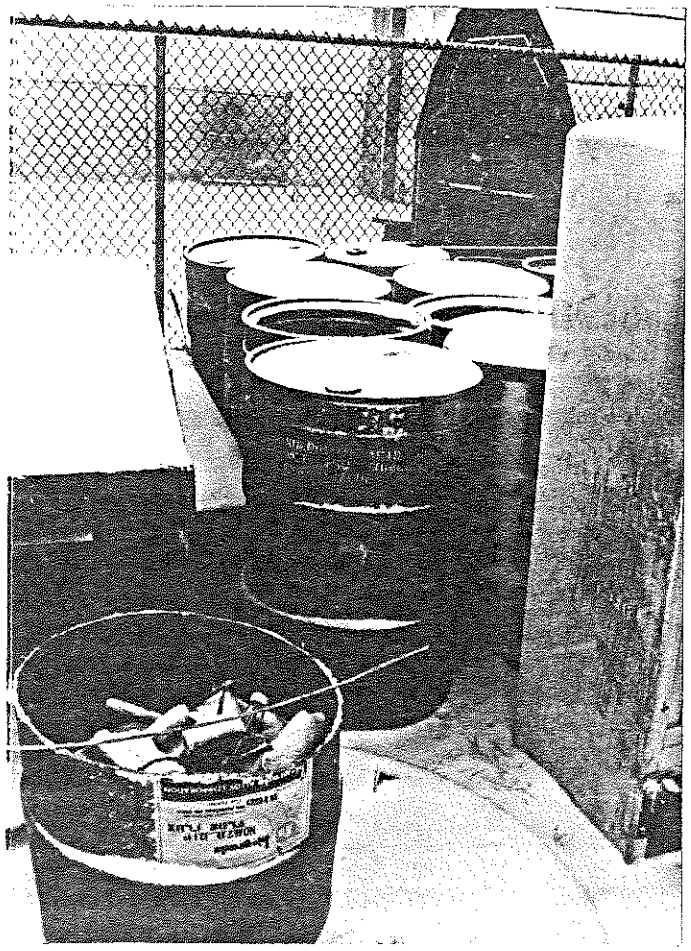
John Maher

Location:

0971900034 - Lake Co.

Waukegan / Amerdec

Comments: Photograph taken toward the North.



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MAY 20 1987
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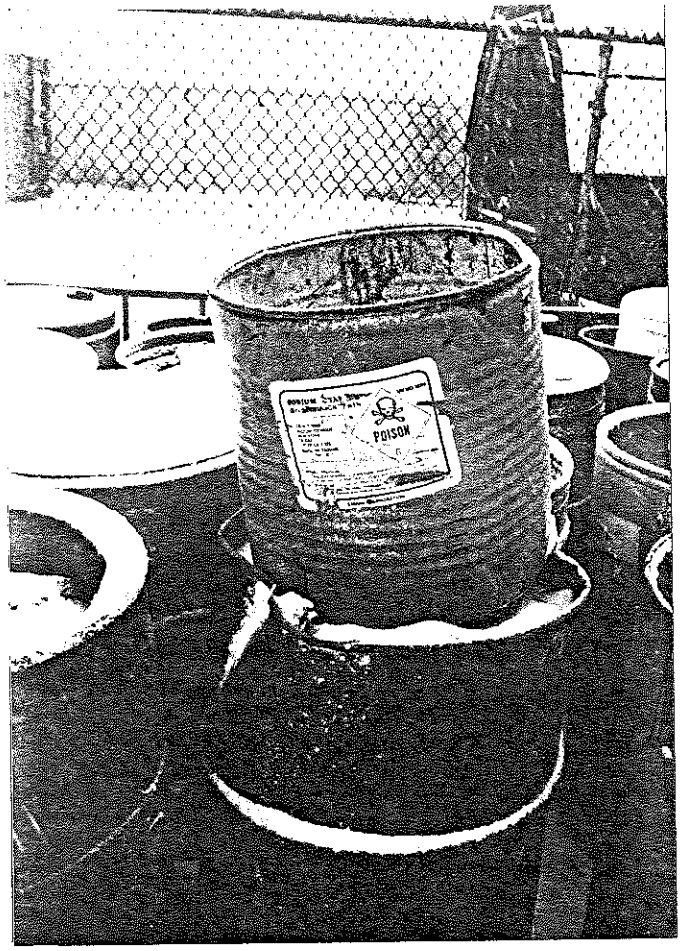


Date: 1-29-87

Time: 9:30-10:30 (A.M) P.M.

Photograph By:

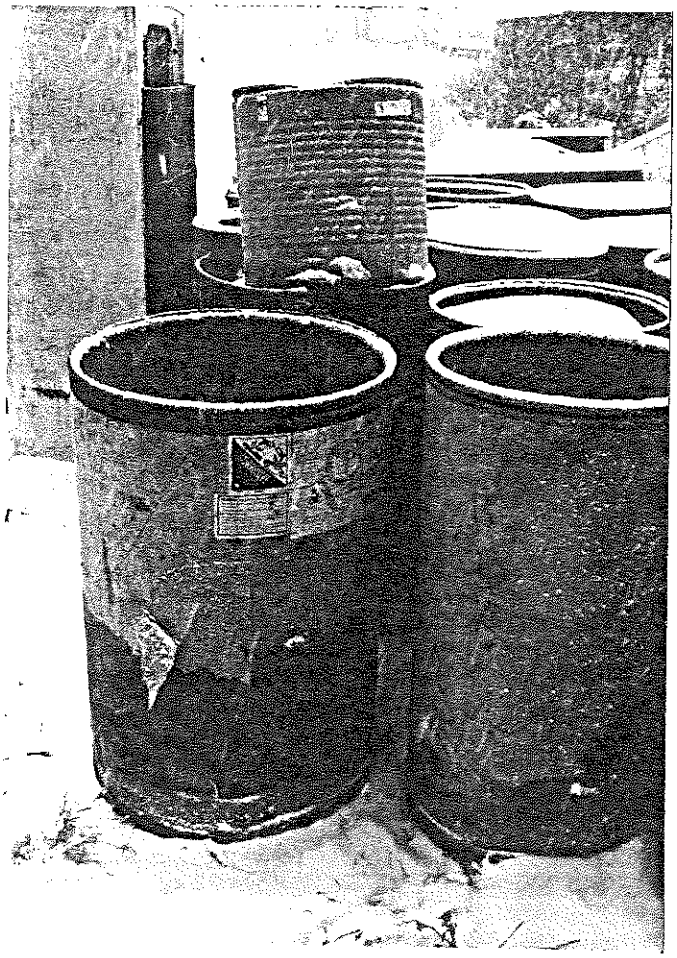
John Maher

Location:

0971900034 - Lake Co.

Waukegan / Amerdec

Comments: Photograph taken toward the West.



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Date: 1-29-87

Time: 9:30-10:30 (A.M.) P.M.

Photograph By:

John Maher

Location:

0971900034 - Lake Co.

Waukegan / Amerdec

Comments: Photograph taken toward the Southeast.

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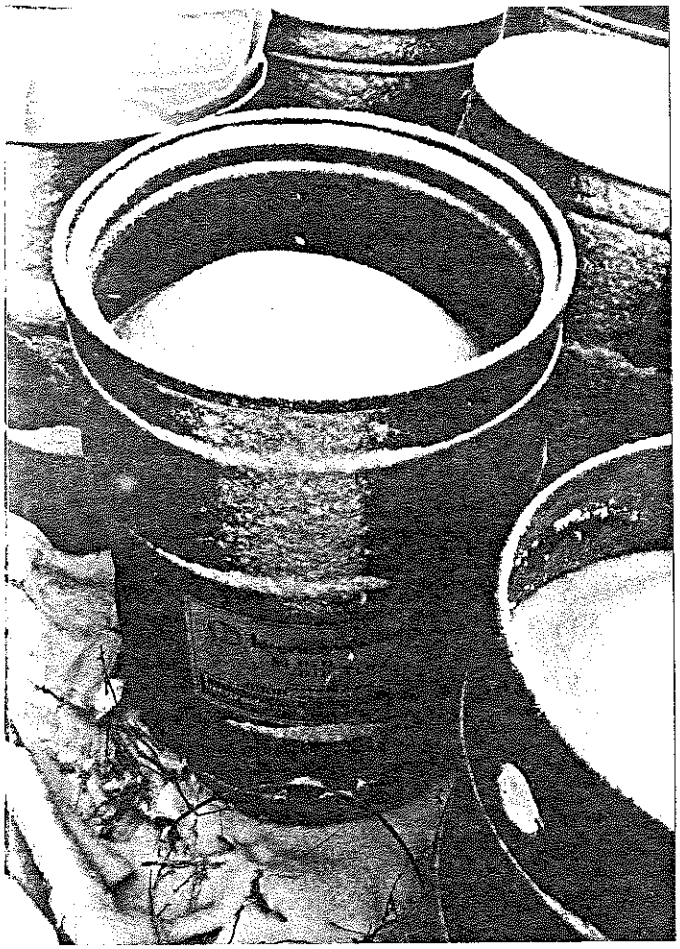

Date: 1-29-87

Time: 9:30-10:30 (A.M.) P.M.

Photograph By:

John Maher

Location:

0971900034 - Lake Co.

Waukegan / Amerdec

Comments: Photograph taken toward the Southeast.

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Location:

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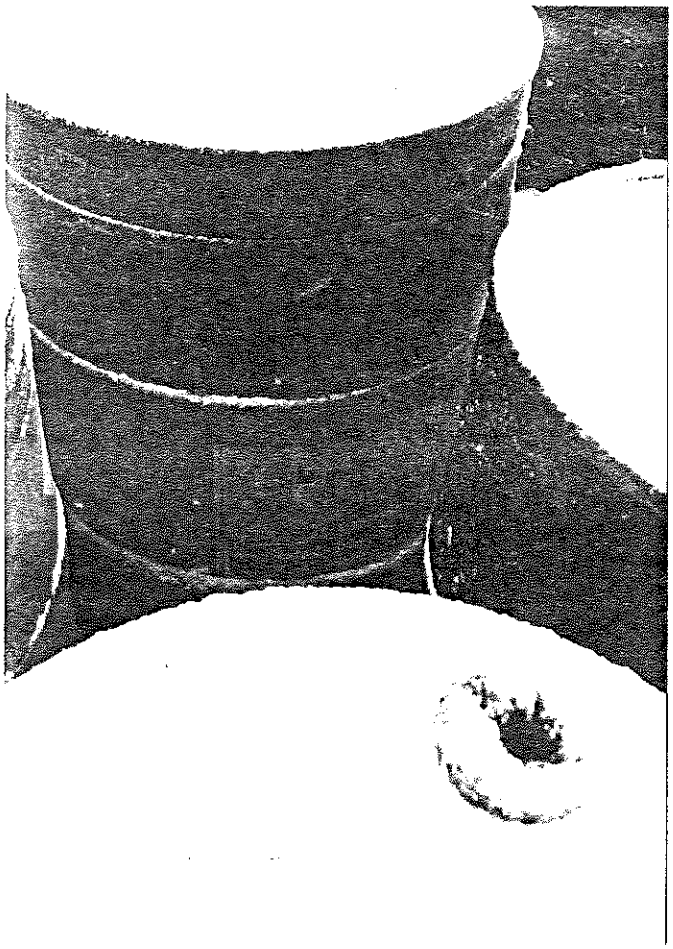
Waukegan / Amerdec

Comments: Photograph taken toward the Southwest.



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Waukegan / Amerdec

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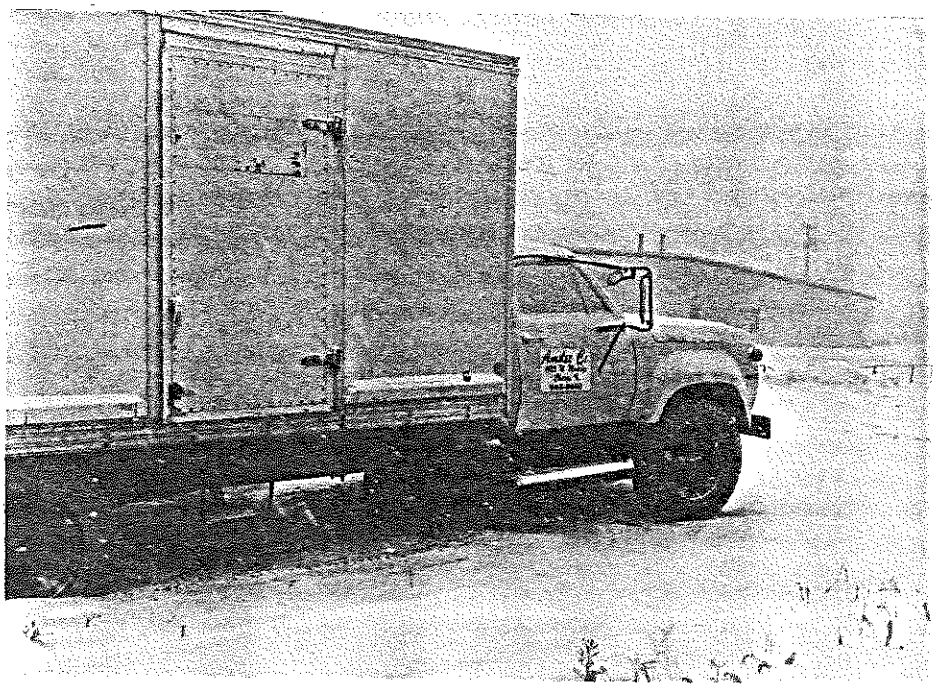

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Photograph By:

John Maher

Location:

0971900034 - Lake Co.

Waukegan / Amerdec

Comments: Photograph taken toward the North.

Date: 1-29-87

Time: 9:30-10:30 (A.M.) P.M.

Photograph By:

John Maher

Location:

0971900034 - Lake Co.

Waukegan / Amerdec

Comments: Photograph taken toward the

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Date: 2-18-87

Time: 9:00 - 10:10 A.M. P.M.

Photograph By:

John Maher

Location:

097190 0034 - Lake Co.

Waukegan / Amerdec

Comments: Photograph taken toward the Southwest inside a white truck.

RECEIVED
MAY 20 1987
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Date: 2-18-87

Time: 9:00 - 10:10 A.M. P.M.

Photograph By:

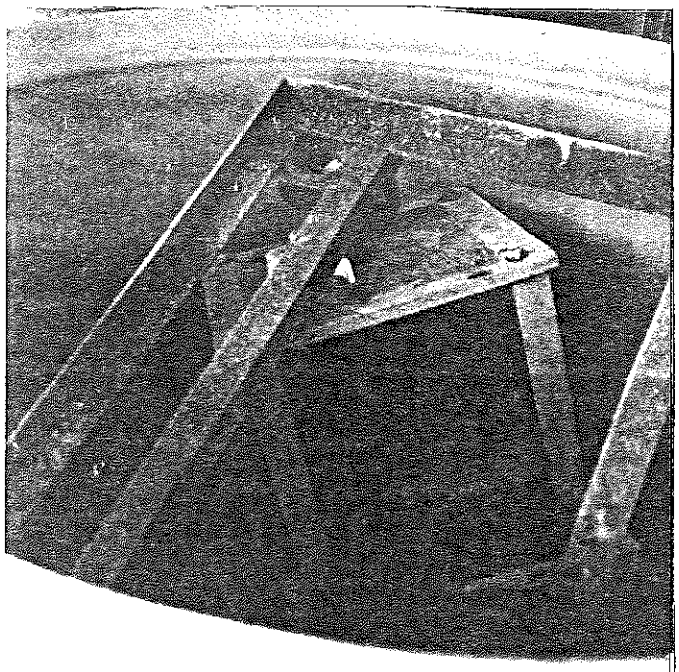
John Maher

Location:

097190 0034 - Lake Co.

Waukegan / Amerdec

Comments: Photograph taken toward the South inside a white truck.



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IEPA-DLPC

Date: 2-18-87

Time: 9:00-10:10 (A.M.) P.M.

Photograph By:

John Maher

Location:

0971900034 - Lake Co.

Waukegan / Amerdec

Comments: Photograph taken toward the West inside a white truck.

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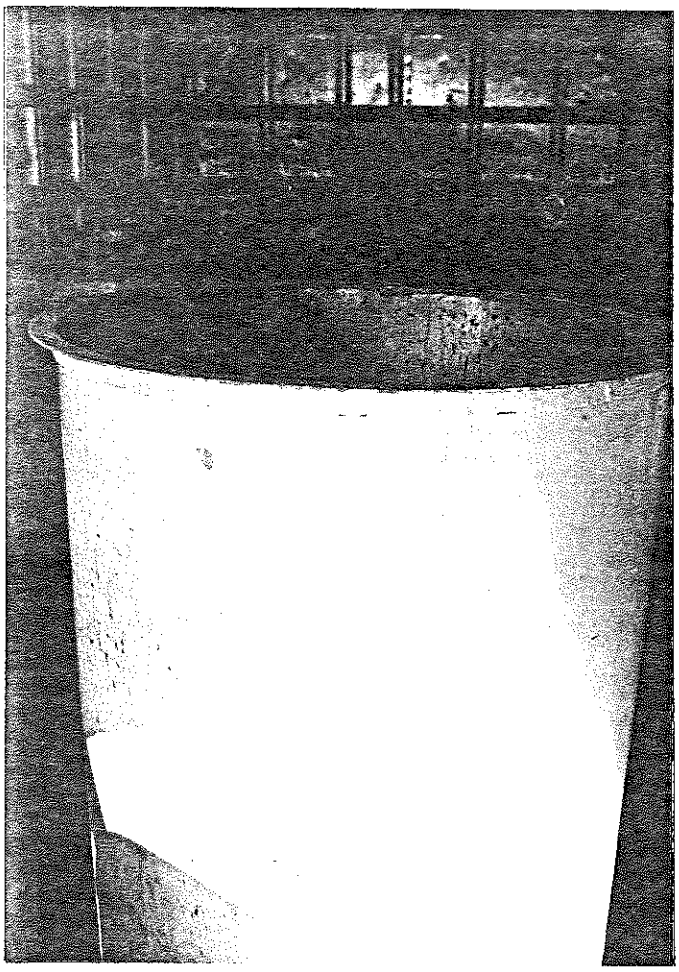

Date: 2-18-87

Time: 9:00-10:10 (A.M.) P.M.

Photograph By:

John Maher

Location:

0971900034 - Lake Co.

Waukegan / Amerdec

Comments: Photograph taken toward the West inside a white truck.

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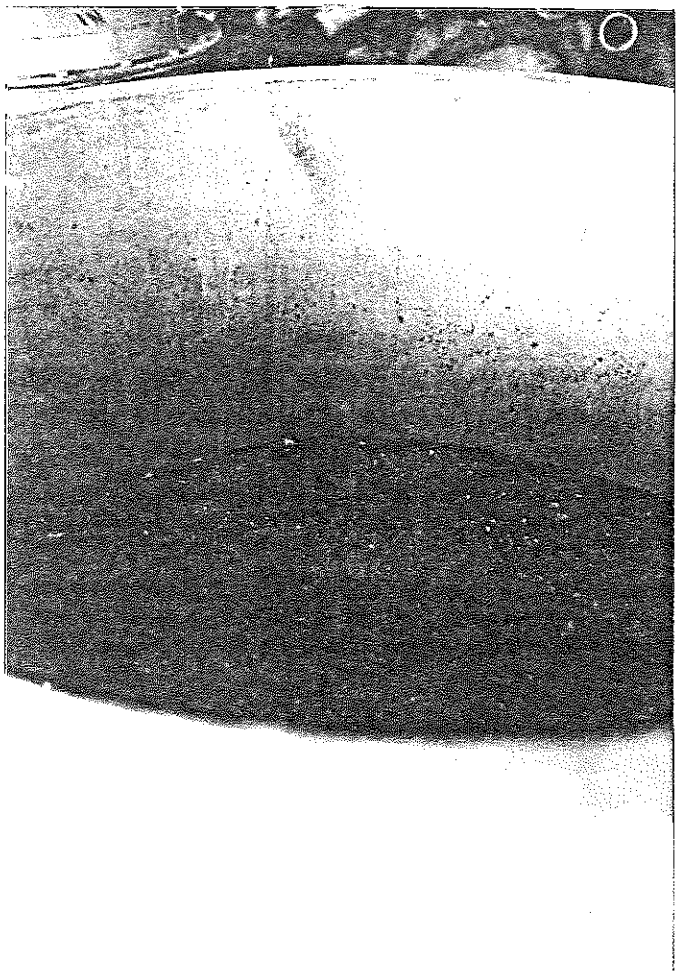

Date: 2-18-87

Time: 9:00-10:10 (A.M.) P.M.

Photograph By:

John Maher

Location:

0971900034 - Lake Co.

Waukegan / Amerdec

Comments: Photograph taken toward the floor of the white truck, oriented towards the west.

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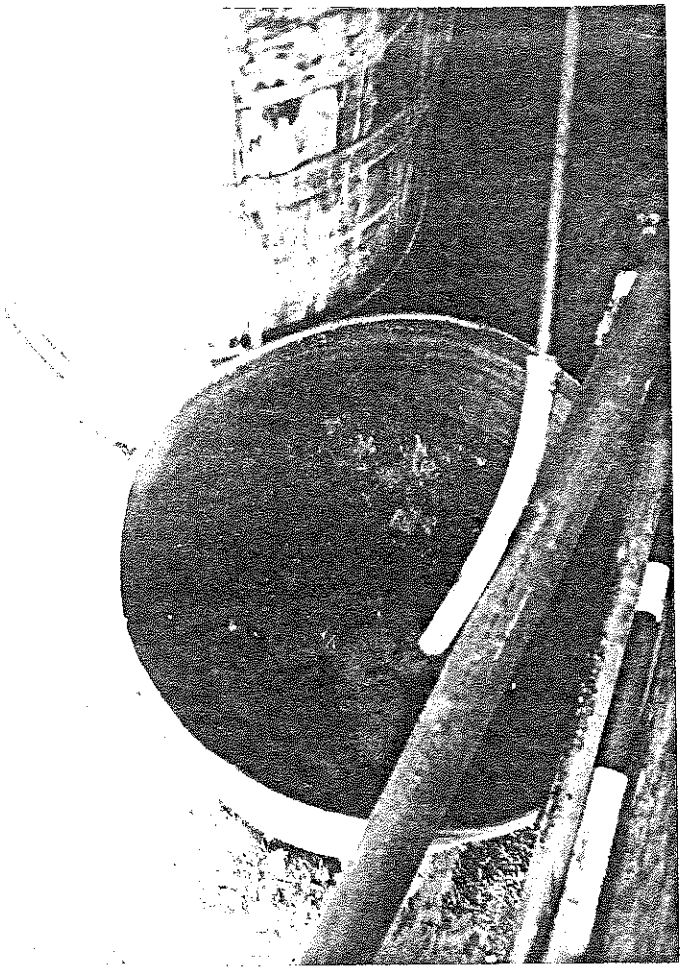

Date: 2-18-87

Time: 9:00-10:10 (A.M.) P.M.

Photograph By:

John Maher

Location:

0971900034 - Lake Co.

Waukegan / Amerdec

Comments: Photograph taken toward the west inside ~~the~~ a white truck.

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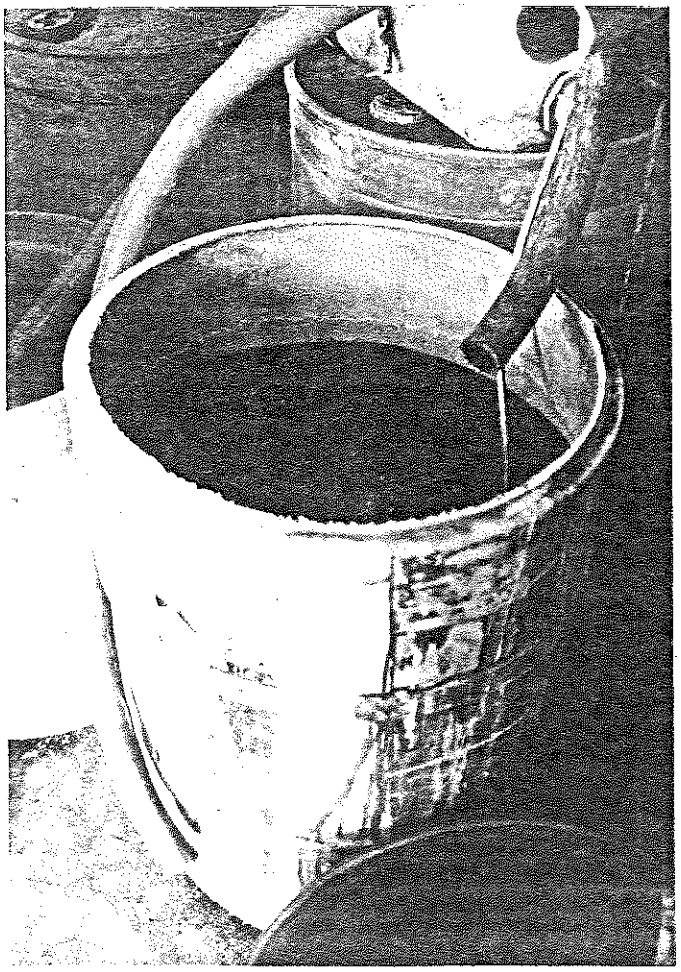

Date: 2-18-87

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Photograph By:

John Maher

Location:

0971900034 - Lake Co.

Waukegan / Amerdec

Comments: Photograph taken toward the Southwest inside a white truck.

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Waukegan / Amerdec

Comments: Photograph taken toward the Southwest inside a white truck.

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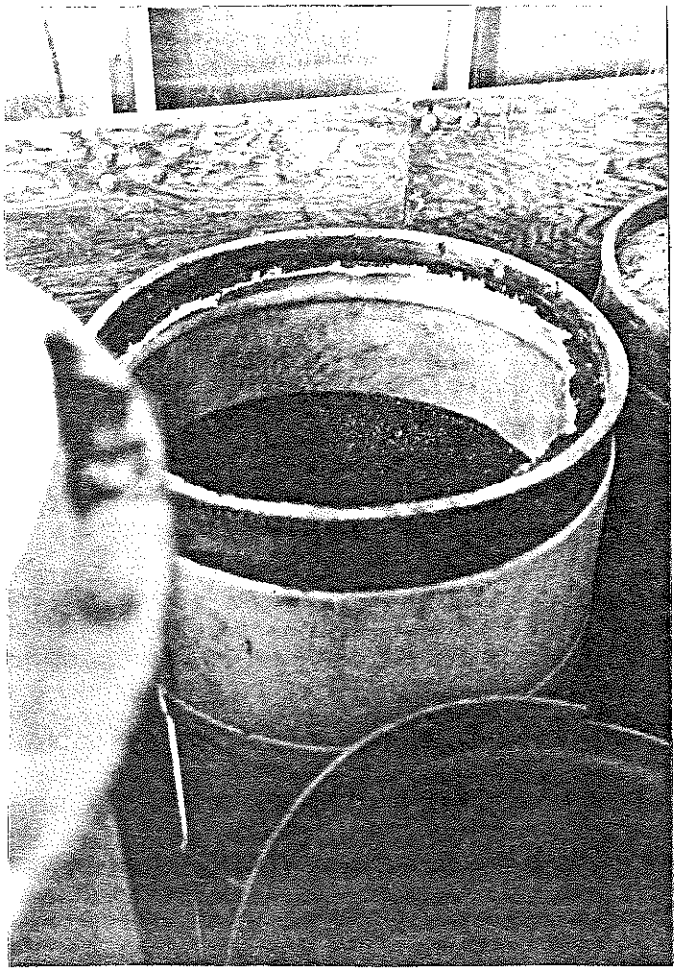


ate: 2-18-87

Time: 9:00-10:10 (A.M.) P.M.

Photograph By:

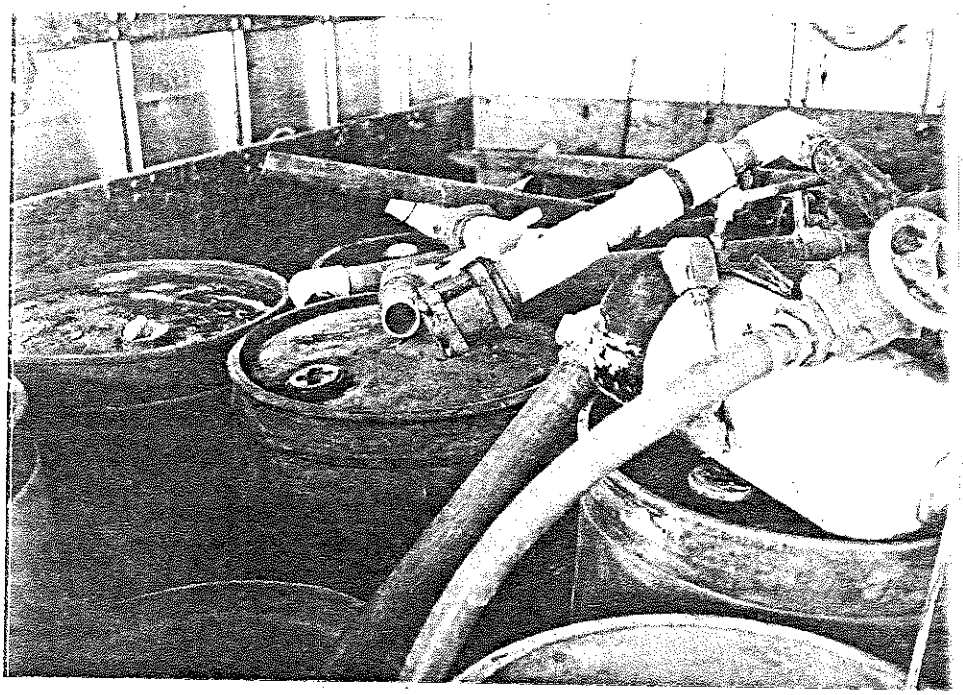
John Maher

Location:

0971900034 - Lake Co.

Waukegan / Amerdec

Comments: Photograph taken toward the Southest inside a white truck.



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Photograph By:

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Location:

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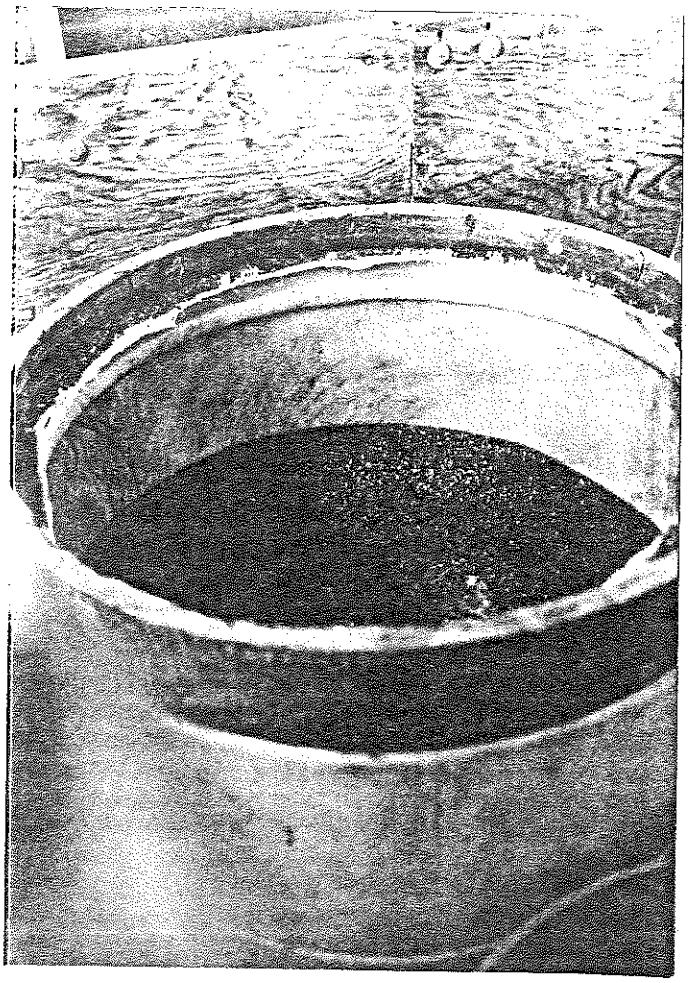
Waukegan / Amerdec

Comments: Photograph taken toward the Southwest inside a white truck.



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IEPA-DLPC

Date: 2-18-87

Time: 9:00 - 10:10 A.M. P.M.

Photograph By:

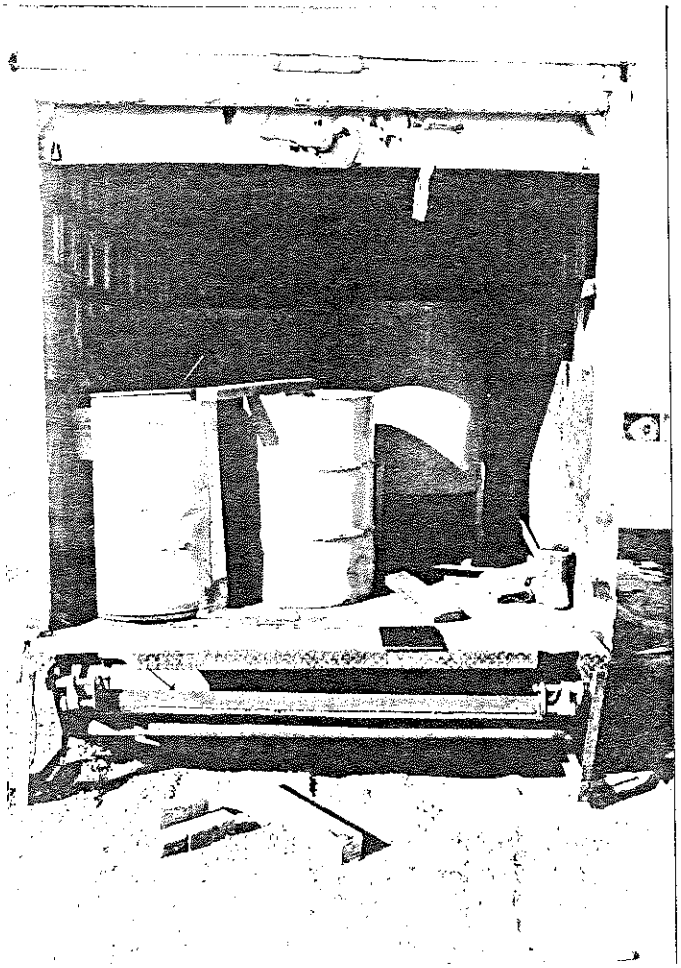
John Maher

Location:

0971900034 - Lake Co.

Waukegan / Amerdec

Comments: Photograph taken toward the west behind the building.



Date: 2-18-87

Time: 9:00 - 10:10 A.M. P.M.

Photograph By:

John Maher

Location:

0971900034 - Lake Co.

Waukegan / Amerdec

Comments: Photograph taken toward the

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IEPA-DLPC

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MAR 18 1987
IEPA-DLPC

Area	C	90 Day F/U	Key Ltr Sub Sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
				Part 723 STANDARDS APPLICABLE TO TRANSPORTERS OF HAZARDOUS WASTE Subpart A: General Section 723.110 Scope Has the firm ever transported hazardous waste into the United States from abroad? Yes ____ No X Has the firm ever mixed hazardous wastes of different DOT shipping descriptions by placing them into a single container? Yes ____ No X Note: A "Yes" answer to either of these questions means the transporter is also a generator of hazardous waste subject to the requirements of Part 722. Complete the generator inspection form.				
OTH	1		B	Section 723.111 USEPA Identification Number Has the transporter obtained a USEPA identification number? Yes ____ No X	____	X		An I.D. number has not been applied for.
OTH	1	X	B,D, F,G	Section 723.112 Transfer Facility Requirements Has a transporter of hazardous waste stored manifested shipments of such waste: - For a period of 10 days or less? Yes ____ No X	____	X		Waste has been stored over ten days.

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Area	C	90 Day F/U	Key Ltr Sub See	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
				- Only in containers meeting the requirements of 35 Ill. Adm. Code 722.130, Packaging? Yes ___ No X Note: A "No" answer to the above questions means that the transporter is also a storer of hazardous waste subject to the requirements of 35 Ill. Adm. Code 702, 703, and 724 (725). Complete the TSD inspection form.				Several containers did not have ~~one~~ tops.

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Area	C.	90 Day F/U	Key Ltr Sub Sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
				Part 723				
				STANDARDS APPLICABLE TO TRANSPORTERS OF HAZARDOUS WASTE				
			B,D, F,G	Subpart B: Compliance With the Manifest System and Record keeping				
MAN	½ or			Section 723.120 The Manifest System	___	X		Manifests were not used in the transportation of this waste.
			a)	Prior to accepting hazardous waste from a generator, has the transporter received a manifest signed by the generator in accordance with the provisions of Part 722? Yes ___ No X				
			b)	Prior to transporting hazardous waste, has the transporter apparently: - Signed and dated the accompanying manifests? Yes ___ No ___ - Returned a signed copy to the generator? Yes ___ No ___				
			c)	before leaving the generator's property? Yes ___ No ___				
			d)	Does the manifest apparently remain with the load of hazardous waste during transport? Yes ___ No ___				
				Has the transporter who delivers hazardous waste to another transporter or to the designated facility: 1) Apparently obtained the date of delivery and the hand written signature of the transporter or designated facility? Yes ___ No ___				

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			2) Retained one copy of the signed manifest in accordance with Section 723.122? Yes ____ No ____				
			3) Apparently given the remaining copies of the manifest to the accepting transporter or designated facility? Yes ___ No ___				
		e)	Has the transporter followed the procedures prescribed in Section 723.120 9e) for manifesting bulk shipments of hazardous waste by water? Yes ___ No ___				
		f)	Has the transporter followed the procedures prescribed in Section 723.120 (f) for manifesting shipments of hazardous waste involving rail transportation? Yes ___ No ___				
		g)	Has the transporter who transports hazardous waste out of the United States:				
			1) Indicated on the manifest the date the hazardous waste left the United States? Yes ___ No ____				
			2) Signed the manifest and retained one copy in accordance with the requirements in Section 723.122(c)? Yes ___ No ___ N/A ___				
			3) Apparently returned a signed copy of the manifest to the generator? Yes ___ No ___ N/A ___				
MAN	1		Section 723.121 Compliance with the Manifest			X	A manifest was not used in the transportation of the waste.
		a)	Has the transporter delivered the entire quantity of hazardous waste accepted from the generator or other transporter to:				
			1) The designated facility on the manifest? Yes ___ No ____ N/A X				

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Area	C-	90 Day F/U	Key Ltr Sub Sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
				2) The alternate designated facility if the hazardous waste cannot be delivered to the designated facility because an emergency prevented delivery? Yes ___ No ___ N/A X				
				3) The next designated transporter? Yes ___ No ___ N/A X				
				4) The place outside the United States designated by the generator? Yes ___ No ___ N/A X				
			b)	In any case where the transporter could not deliver the hazardous waste to the facility designated on the manifest did the transporter contact the generator for further directions and then revise the manifest according to the generator's instructions? Yes ___ No ___ N/A X				
OTH	2			Section 723.122 Record keeping	___	___	X	
			a)	Has the transporter kept a copy of each completed, signed manifest for a period of three years from the date the hazardous waste was accepted by the initial transporter? Yes ___ No ___ N/A X				Manifests have not been used in the transportation of the waste
			b)	Has the transporter followed the procedures prescribed in Section 723.122(b) for record keeping for bulk shipments of hazardous waste by water? Yes ___ No ___ N/A X				No bulk shipments of hazardous waste
				Has the transporter followed the procedures prescribed in Section 723.122 (c) for shipments of hazardous waste by rail within the United States? Yes ___ No ___ N/A X				No rail shipments of hazardous waste.

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Area	C	90 Day F/U	Key Ltr Sub Sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
			d)	Has the transporter who transports hazardous waste out of the United States kept a copy of each manifest indicating that the hazardous waste left the United States for a period of three years from the date the waste was accepted by the initial transporter? Yes ___ No ___ N/A X				No hazardous waste transported out of U.S.
			e)	Does a transporter who is involved in any unresolved enforcement action continue to maintain the records required in 723.122 (a) thru (d)? Yes ___ No ___ N/A X				Transporter is not involved in any unresolved enforcement action. (And transporter has not generated any records.)
			e)	If the Director has requested that the records required in 722.140 (a) thru (c) be maintained for a period longer than three years, has the transporter continued to maintain them? Yes ___ No ___ N/A X				Request has not been made by the Director.

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Area	C.	90 Day F/U	Key Ltr Sub Sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
				Part 723				
				STANDARDS APPLICABLE TO TRANSPORTERS OF HAZARDOUS WASTE				
			B,D, F,G	Subpart C Hazardous Waste Discharges				
OTH	1			Section 723.130 Immediate Action	___	___	X	No incident has occured.
			a)	Did a transporter who has had an incident where hazardous waste was discharged from the transport vehicle, vessel or aircraft take appropriate immedate action to protect human health and the environment (for example, notify local authorities, dike the discharge area)? Yes ___ No ___				
			c) d)	Did the transporter who had discharged hazardous waste give notice and prepare a written report as required in Section 723. 140 (c) and (d)? Yes ___ No ___ N/A ___				
OTH	1	X		Section 723.131 Discharge Clean Up	___	___	X	No discharge has occured.
				After a discharge of hazardous waste did the transporter:				
				- Clean up the discharge? Yes ___ No___				
				- Take such action as may be required or approved by Federal, State or local officials so that the hazardous waste no longer presents a hazard to human health or the environment? Yes ___ No ___				

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Area	C.	90 Day F/U	Key Ltr Sub Sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
				Part 703				
				RCRA PERMIT REPORT				
			C,E, F,G	Subpart B — Prohibitions				
OTH	1			Section 703.121 — RCRA Permits		X		Site does not have interim status or a RCRA permit.
			a)	Is any persons conducting any hazardous waste storage, hazardous waste treatment or hazardous waste disposal operation doing so only:				
				1) With a RCRA permit for the HWM facility? Yes ___ No X				
				2) In conformance with all conditions imposed by the RCRA permit? Yes ___ No X				
			b)	Do the owner and operator of hazardous waste management units have permits during the active life of the unit (including the closure period)? Yes ___ No X				
			b)	Do the owners and operators of any hazardous waste unit which closed after January 26, 1982, have a permit during any post-closure period required under 35 Ill. Adm. Code 724.217 Post Closure Care and Use of Property and during any compliance period or any extension of that compliance period specified under 35 Ill. Adm. Code 724.196, Compliance Period? Yes ___ No ___ N/A X				

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

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

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Area	Ck	90 Day F/U	Key Ltr	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
				- Employing processes not specified in Part A of the permit application? Yes ___ No ___ - Exceeding the design capacities specified in Part A of the permit application? Yes ___ No ___				
OTH	1			Section 703.155 Changes During Interim Status	___	___	X	Site does not have interim status.
			a) b) or c)	Note: Section 703.155 (a) (b) and (c) reiterate in more detail the requirement that a HWM facility submit and, in the case of (b) and (c) that the Agency approve, amendments to the Part A permit application prior to the facility conducting the activity or receiving new hazardous waste. A "No" answer to any of the questions under Section 703.154 means the facility is also in apparent non-compliance with this section.				
			d)	Did the owner or operator submit a revised Part A permit appication not later than 90 days prior to changes in operational control or ownership of the HWM facility? Yes ___ No ___ N/A ___				
OTH	1			Section 703.156 Interim Status Standards Is the owner or operator complying with all interim status standards of 35 Ill. Adm. Code 725? Yes ___ No ___ Note: Complete the applicable portions of the TSD inspection form prior to answering the above questions.	___	___	X	Site does not have interim status. Part 724 applies instead of Part 725.

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Area	C1	90 Day F/U	Key Ltr Sub Sec.	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
				Part 725				
				INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES				
			C,E F,G	Subpart A General Provisions				
OTH	1			Section 725.101 Purpose, Scope And Applicability	___	___	X	This paragraph does not apply to sites subject to 724.
			d)	~~Has the firm managed hazardous waste with the following hazardous waste numbers: F020, F021, F022, F023, F026 or F027 in compliance with the requirements of 725.101 (d)? Yes ___ No X.~~				

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Area	Cr	90 Day F/U	Key Ltr	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
				Part 725				
				INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES				
			C,E, F,G	Subpart B General Facility Standards				
OTH	1			Section 725.111 USEPA Identification Number	___	X		Site is a non-notifier.
				Has the facility obtained a USEPA identification number? Yes ___ No X				
				Section 725.112 Required Notices	___	___	X	
			a)	Has the owner or operator of a facility that has arranged to receive hazardous waste from a foreign source notified the Regional Administrator, in writing, at least four weeks in advance of the date that the waste is expected to arrive at the facility? Yes ___ No ___ N/A X				
			b)	Before transferring ownership or operation of a facility during its operating life, or of a disposal facility during the post-closure care period; did the owner or operator notify the new owner or operator, in writing, of the requirements of 35 Ill. Adm. Code 702, 703 and 725? Yes ___ No ___ N/A X				
OTH	1			Section 725.113 General Waste Analysis	___	X		No waste analyses have been performed.
			a)1)	Has the owner or operator of the facility obtained a detailed chemical analysis of each waste prior to its treatment, storage or disposal? Yes ___ No X				

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

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

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

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

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Area	C.	90 Day F/U	Key Ltr	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
OTH	2			Section 725.115 General Inspection Requirements	___	X		No inspections are conducted.
			a)	Does the owner or operator inspect the facility for malfunctions, deterioration, operator errors and discharges which are causing or may lead to: 1) Release of hazardous waste or hazardous waste constituents to the environment; or 2) A threat to human health? Yes ___ No X				
			a)	Does the owner or operator conduct these inspections often enough to identify problems in time to correct them before they harm human health or the environment? Yes ___ No ___ N/A X				
			b)1)	Has the owner or operator developed a written schedule for inspecting all monitoring equipment, safety and emergency equipment, security devices and operating and structural equipment important to preventing, detecting or responding to environmental or human health hazards? Yes ___ No X				No inspection schedule.
			b)2)	Is the written schedule at the facility? Yes ___ No ___ N/A X				
			b)3)	Does the schedule identify the types of problems which are to be looked for during the inspection? Yes ___ No ___ N/A X				
			b)4)	Does the schedule specify at least the following minimum inspection frequency:				

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

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

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

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

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

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Area	C	90 Day F/U	Key Ltr	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
				Part 725				
				INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES				
			A D C,E, F,G	Subpart C Preparedness and Prevention				
OTH	1	X		Section 725.131 Maintenance and Operation of Facility		X		Some drums are being stored without tops.
				Is the facility being maintained and operated to minimize the possibility of a fire, explosion or any unplanned and sudden or non-sudden release of hazardous waste or hazardous waste constituents to: - Air - Soil, or - Surface water, which would threaten human health or the environment? Yes ___ No X				
OTH	1	X		Section 725.132 Required Equipment	X			
				Is the facility equipped with the following, unless none of the hazards posed by waste handled at the facility could require a particular kind of equipment:				
			a)	- An internal communications or alarm system capable of providing immediate emergency instructions? Yes ___ No ___ N/A X				The nature of the waste does not require immediate emergency action, such as an ignitable or reactive waste would require.

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

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

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Area	C	90 Day F/U	Key Ltr Sub-sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
			a)1)	1) Arrangements to familiarize police and fire departments and emergency response teams with the layout of the facility, properties of hazardous wastes handled at the facility and associated hazards, places where personnel would normally be working, entrances to roads inside the facility and possible evactuation routes? Yes ___ No X N/A ___				
			a)2)	2) Where more than one police or fire department might respond to an emergency, has one been designated as the primary emergency authority with the others agreeing to provide support to the the primary emergency authority? Yes ___ No ___ N/A X				No more than one department will respond.
			a)3)	3) Agreements with State emergency response teams, emergency response contractors and equipment suppliers? Yes ___ No X N/A ___				
			a)4)	4) Arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illnesses which could result from fires, explosions or releases at the facility? Yes ___ No X N/A ___				
				Note: Any "N/A" answer must be explained in the comments.				
			b)	Has the owner or operator documented, in the operating record, refusal of State or local authorities to enter into any or all of the above arrangements? Yes ___ No ___ N/A X				This is no operating record and the State and local authorities apparently have not been contacted.

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Area	C	90 Day F/U	Key Ltr / Sub-sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
				Part 725				
				INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES				
			C, E, F, G	Subpart D — Contingency Plan and Emergency Procedures				
OTH	1			Section 725.151 — Purpose and Implementation of Contingency Plan	___	X		No contingency plan
			a)	Is the plan designed to minimize hazards to human health or the environment from fires, explosions or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil or surface waters? Yes ___ No X				
			b)	Have the provisions of the plan been carried out immediately whenever there was a fire, explosion or release of hazardous waste constituents which could threaten human health or the environment? Yes ___ No ___ N/A ___				
OTH	2			Section 725.152 — Content of Contingency Plan	___	___	X	No contingency plan
			a)	Does the plan describe the actions facility personnel must take to comply with Sections 725.151 and 725.156 in response to: 1) Fires. Yes ___ No ___ 2) Explosions. Yes ___ No ___ 3) Unplanned sudden or non-sudden releases of hazardous waste or hazardous waste constituents to air, soil or surface water? Yes___ No___				

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

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Area	Cl	90 Day F/U	Key Ltr / Sub-sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
			f)	Does the plan include an evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? Yes ___ No ___				
			f)	Does the plan identify the signal to be used to begin evacutation? Yes __ No ___				
			f)	Are alternate evacuation routes identified? Yes __ No ___				
OTH	2			Section 725.153 Copies of Contingency Plan	___	X		No contingency plan.
				Has a copy (and all revisions) of the contingency plan:				
			a)	a) Been maintained at the facility? Yes ___ No X				
			b)	b) Been submitted to all local police and fire departments, hospitals, and State and local emergency response teams that may be called upon to provide emergency service? Yes ___ No X				
OTH	2			Section 725.154 Amendment of Contingency Plan	___	___	X	No contingency plan
				Has the contingency plan been reviewed, and if necessary, amended whenever:				
			a)	1) Applicable regulations are revised? Yes ___ No ___				
			b)	2) The plan fails in an emergency? Yes ___ No ___ N/A ___				

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

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

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Area		90 Day F/U	Key Ltr Sub-sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
				Part 725				
				INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES				
			C,E, F,G	Subpart E Manifest System, Recordkeeping and Reporting				
OTH	1			Section 725.171 Use of Manifest System			X	Manifests were not used in the transportation of the waste.
				Does the facility accept waste from off-site? Yes X No ___				
				Note: If the answer is "Yes", complete this section. If the answer is "No", check "N/A".				
				For each manifest reviewed, did the facility: N/A X				
			a)1)	1) Sign and date each copy to certify that the hazardous waste covered by the manifest was received? Yes ___ No ___				
			a)2)	2) Note any significant discrepancies in the manifest or each copy of the manifest? Yes ___ No ___ N/A ___				
			a)3)	3) Immediately give one copy of the completed manifest to the transporter? Yes ___ No				
			a)4)	4) Within 30 days after delivery, send one copy of the manifest to the generator and one copy to the Agency? Yes ___ No ___				

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

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

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

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

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Area	C.	90 Day F/U	Key Ltr Sub-sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
OTH	2			Section 725.174 Availability, Retention and Disposition of Records			X	There were no existing records, so they could not be in compliance or in violation of this section
			a)	During the inspection were all existing records, including plans, required under this Part furnished upon request and made available at all reasonable times for inspection as required by this Section? Yes ___ No ___ N/A X				
			c)	Upon closure of a waste disposal facility did the owner or operator submit a copy of the record of waste disposal location(s) and quantities to: N/A X - The Agency? Yes ___ No ___ - The local land authority? Yes ___ No ___ N/A ___				
			b)	Are all required records being maintained and retained during the course of any unresolved enforcement action or as requested by the Director? Yes ___ No ___ N/A X				
OTH	2			Section 725.175 Annual Report Has the owner or operator prepared and submitted a copy of an annual report, supplied by the Agency, to the Agency by March 1 for the preceding calendar year? Yes ___ No X N/A ___		X		No Annual Report has been submitted.

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

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Area	C	90 Day F/U	Key Ltr / Sub-sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
OTH	2			Section 725.177 Additional Reports			X	
				Has the owner or operator submitted to the Agency, as required, reports concerning:				
			a)	1) Releases, fires, explosions as specified in Section 725.156? Yes ___ No___ N/A X				No such incidences have occured
			b)	2) Groundwater contamination and monitoring data as specified in Sections 725.193 and 725.194? Yes___ No ____ N/A X				Waste is only stored in containers.
			c)	3) Facility closure as specified in Section 725.125? Yes ___ No ___ N/A X				Closure has not occured.

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

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Area		90 Day F/U	Key Ltr Sub-sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
FIN	1			Section 725.242 Cost Estimate For Facility Closure Has the facility prepared a written estimate of the cost of closing the facility in accordance with the closure plan as specified in Section 725.212? Yes ___ No X		X		No closure cost estimate.
FIN	1			Section 725.244 Cost Estimate For Post-Closure Care Has the facility prepared a written estimate of the annual cost of post-closure monitoring and maintenance of the facility? Yes ___ No ___ N/A X			X	Site is not an LDF.

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Area		90 Day F/U	Key Ltr Sub-sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
				Part 725				
				INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES				
			A, D. C, E, F, G	Subpart I Use and Management of Container				
OTH	1	X		Section 725.271 Condition of Containers		X		Container X208 was leaking slightly.
				Has the owner or operator transferred the hazardous waste in leaking container or containers which are not in good condition or managing the waste in some other way that complies with the requirements of this Part? Yes ___ No X N/A ___				
OTH	1	X		Section 725.272 Compatibility of Waste with Container	X			
				Is the owner or operator using containers made of or lined with materials which will not react with and are otherwise compatible with the hazardous waste to be stored so that the ability of the container to contain the waste is not impaired? Yes X No ___				
OTH	1	X		Section 725.273 Management of Containers		X		Several containers were being stored open.
			a)	Are containers of hazardous waste always closed during storage? Yes ___ No X				

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Area	C.	90 Day F/U	Key Ltr Sub-sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
			b)	Are containers of hazardous waste being opened, handled or stored in manner which will prevent the rupture of the container or prevent it from leaking? Yes ___ No X				Container X208 was leaking.
OTH	2			Section 725.274 Inspections Is the owner or operator inspecting areas where the containers are stored at least weekly, looking for leaks and for deterioration caused by corrosion or other factors? Yes ___ No X Note: Any evidence of leakage may be a reason to answer "No" to the above question, even if there are inspection records that indicate that inspections are being done. Review the responses in Section 725.115, General Inspection Requirements, the frequency of inspections, the date of the last inspection, etc. to determine if inspections are actually being done.	___	X		No inspections are conducted
OTH	1	X		Section 725.276 Special Requirements for Ignitable or Reactive Wastes Are containers holding ignitable or reactibe waste located at least 50 feet from the property line? Yes ___ No ___	___	___	X	Apparently there are no ignitable or reactive wastes.
OTH	1	X		Section 725.277 Special Requirements for Incompatible Wastes Is the owner complying with the requirements concerning the management of incompatible wastes or incompatible wastes and materials contained in this Section? Yes ___ No ___	___	___	X	Apparently there are no Incompatible waste.

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

U.S.G.P.O. 153-506

Sent to Magdelene Allegretti, Pres.	
Street and No. 90 Le Baron	
P.O., State and ZIP Code Waukegan, Il 60085	
Postage	$ 1.25
Certified Fee	85
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	90
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	$ 3.00
Postmark or Date	

CHICAGO PLAZA LOOP STA. APR 25 1988 USPO

PS Form 3800, June 1985

Barbara Russell (545-12)

SENDER: Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.
Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.
1. ☒ Show to whom delivered, date, and addressee's address. ↑*(Extra charge)*↑
2. ☐ Restricted Delivery ↑*(Extra charge)*↑

3. Article Addressed to: Magdelene Allegretti, President Amerdec, Inc. 90 Le Baron Waukegan, Il 60085	4. Article Number P 571 916 684
	Type of Service: ☐ Registered ☐ Insured ☒ Certified ☐ COD ☐ Express Mail
	Always obtain signature of addressee or agent and DATE DELIVERED.
5. Signature — Addressee X Sam Allegretti	8. Addressee's Address *(ONLY if requested and fee paid)* 90 Le Baron St
6. Signature — Agent X	
7. Date of Delivery 4/18/88	

PS Form 3811, Mar. 1987 ★ U.S.G.P.O. 1987-178-268 **DOMESTIC RETURN RECEIPT**

UNITED STATES POSTAL SERVICE

OFFICIAL BUSINESS

SENDER INSTRUCTIONS

Print your name, address, and ZIP Code in the space below.

- Complete items 1, 2, 3, and 4 on the reverse.
- Attach to front of article if space permits, otherwise affix to back of article.
- Endorse article "Return Receipt Requested" adjacent to number.

U.S.MAIL

PENALTY FOR PRIVATE USE, $300

RETURN TO

Print Sender's name, address, and ZIP Code in the space below.

Ms. Barbara Russell (5HS-12)

UNITED STATES OF AMERICA
ENVIRONMENTAL PROTECTION AGENCY
230 S. DEARBORN
CHICAGO IL 60604

FL/MI/WI Enforcement Program Section

Barb Russell / Clarizio

RCRA ENFORCEMENT ACTION SIGN-OFF

PART I. BACKGROUND

FACILITY NAME Amerdec

FACILITY LOCATION 90 Le Baron Waukegan

RCRA ID NUMBER Non-notifier

NATURE OF VIOLATION Closure/Certification

ANY OTHER OUTSTANDING OR PAST ENFORCEMENT ACTIONS AGAINST THIS FACILITY:

WATER

AIR

OTHER

PART II. RECOMMENDATION Issue Order

Penalty $45,000

PART III. CONCURRENCES ON DRAFT

	INITIALS	DATE	AGREE	DISAGREE
PREPARER	BJL	10/16/87	(✓)	( )
CHIEF, RCRA ENF. UNIT	P.E.N	1-12-88	(✓)	( )
CHIEF, RCRA ENF. SECTION	WEM	1-20-88	(✓)	( )
ASSISTANT REGIONAL COUNSEL Rich Clarizio	[illegible] 3/17/88	w. correction/ [illegible]	3-17-88	(✓) ( )

NAME & DATE OF STATE CONTACT NOTIFIED William Child, IEPA 8/26/87

PART IV. APPROVAL

1. PREPARER	BJL	3/22/88	(✓)	( )
2. CHIEF, RCRA ENF. ~~UNIT~~ SECTION	P.E.N 4-5-88	3/23/88	(✓)	( )
3. CHIEF, RCRA ENF. ~~SECTION~~ BRANCH	JMB	4/6/88	(✓)	( )
4. CHIEF, H.W. ENF. BRANCH ASS. DIR.	WEM	4/8/88	(✓)	( )
5. ASSISTANT REGIONAL COUNSEL Rich Clarizio	[illegible]	4/11/88	(✓)	( )
6. CHIEF, S.W. & E.R. SECTION	[illegible]	4/11/88	(✓)	( )
~~7. CHIEF, SOLID WASTE & EMER. RESPONSE BRANCH~~			( )	( )
~~8. REGIONAL COUNSEL~~			( )	( )
9. DIRECTOR, WASTE MGT. DIV.	[illegible]	4/13/88	(✓)	( )

NOTE: Attach sign-off sheet to yellow copy of the enforcement action.

3-7922 (Tues)

Bart

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION V

IN THE MATTER OF	)	
	)	DOCKET NO.
AMERDEC, INC.	)	
	)	RCRA-V-W-R-018
RESPONDENT	)	

STATUS REPORT AND MOTION FOR EXTENSION OF TIME TO COMPLETE PRE-HEARING EXCHANGE OF INFORMATION

Pursuant to Administrative Law Judge, Frank W. Vanderheyden's Order of June 10, 1988, the Complainant, United States Environmental Protection Agency (U.S. EPA), hereby files this status report and requests a two week extension, until August 8, 1988, to complete the ordered pre-hearing exchange of information.

I. STATUS REPORT

Respondent and Complainant have had numerous discussions and have exchanged numerous correspondence over the past two months in an attempt to resove this Complaint. The Complainant sent the Respondent a draft Consent Agreement and Final Order (CAFO) on June 10, 1988. As a rsult of the draft CAFO, Respondent and Complainant appear to be in agreement on all of the remedial actions that are outlined in the draft CAFO. The only apparent remaining issue is Respondent's

ability to pay the proposed penalty. To substantiate its inability to pay, Respondent submitted to Complainant certain requested financial information on June 24 and July 8, 1988. Complainant is presently reviewing that data and expects to complete its review in one week and contact the Respondent early in the week of July 18, 1988, with the results of its analysis and its final position on the amount or appropriateness of a penalty.

II. MOTION FOR AN EXTENSION OF TIME

In addition to the facts presented above in Section I (Status Report) Complainant presents the following facts in support of its request for additional time to complete the pre-hearing exchange of informaton.

1. Complainant expects to discuss the amount or appropriateness of the penalty during the week of July 18, 1988, with the Respondent. If an agreement is verbally achieved, Complainant expects that an additional two weeks will be needed to have the final CAFO signed by both parties. The final CAFO agreement will obviate the need for any pre-hearing exchange.

2. If an agreement is not reached, Complainant will need approximately two weeks to compile, xerox and exchange the information ordered in the June 10, 1988, Notice and Order.

For these reasons the Complainant respectfully requests this Administrative Law Judge for a two week extension, until August 8, 1988, to file its pre-hearing exchange of information.

Respectfully submitted,

by Richard J. Clarizio

Richard J. Clarizio
Assistant Regional Counsel
U.S. EPA

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION V

IN THE MATTER OF: AMERDEC, INC. RESPONDENT	))))	RCRA-V-W-R-018

STATUS REPORT, MOTION TO EXTEND TIME FOR PRE-HEARING EXCHANGE AND MOTION TO AMEND THE COMPLAINT

A. STATUS REPORT AND MOTION TO EXTEND TIME FOR PRE-HEARING EXCHANGE (MOTION)

The Complainant, through its undersigned attorney hereby files this Status Report and Motion. Respondent and Complainant, on July 18, 1988, verbally agreed to all outstanding issues in this matter, including the civil penalty. The Complainant is presently revising the draft Consent Agreement and Final Order (CAFO) to reflect the agreements. Complainant expects to send Respondent a final CAFO for review and signature during the week of August 8, 1988 and expects a fully executed CAFO by September 7, 1988. Consequently, Complainant respectfully moves this Court to extend the time for pre-hearing exchange of information to September 7, 1988.

B. MOTION TO AMEND COMPLAINT

Pursuant to 40 CFR 22.14(e), Complainant hereby, respectfully moves this Court to enter the attached Order revising portions of the Complaint to reflect: 1. additional information submitted by the Respondent on June 24 and July 8, 1988; 2. the draft CAFO; and 3. the revised penalty amount verbally agreed to by the Respondent and Complainant. The Complainant requests that the following sections of the Complaint be revised as specified:

I. FINDINGS OF VIOLATION

The following findings should be added after paragraph 14 in the Complaint:

15. In June 1988, Respondent applied to U.S. EPA for an U.S. EPA Hazardous Waste Identification Number. U.S. EPA assigned Amerdec the number ILD 161 401 476.

16. On June 24 and July 8, 1988, Respondent submitted photographs of the area where drums were previously stored and of the locked trucks where the Respondent asserted that the drums are now stored. Respondent also submitted copies of the following personal and corporate financial data for Amerdec and American Demineralizer for calendar years 1985, 1986 and 1987:

a. Corporate Federal Income Tax Returns for American Demineralizer for 1985, and for Amerdec for 1986;

b. Personal Income Tax Return for 1985;

c. 1987 deposit, sales and expense records of Amerdec;

d. Record of employee salaries paid in 1986 and corporate officer salaries in 1985, 1986 and 1987;

e. 1988 Illinois Corporate Annual Report;

f. 1987 Amerdec Industrial Real Estate Lease; and

g. 1988 listing of tangible assets, accounts payable and accounts receivable.

17. The corporate tax information shows sales for American Demineralizer and Amerdec as approximately $44,390 in 1985, $123,465 in 1986, and $47,731 in 1987. The losses shown for these businesses were approximately $11,410 in 1985, $4,575 in 1986 and $20,250 in 1987.

18. Amerdec received approximatley $15,000 and $8,000 in loans from the stockholders/corporate officers in 1986 and 1987, respectively. Amerdec also received approximately $14,000 in personal loans in 1987.

19. The corporate officers of Amerdec and American Demineralizer have not received any salaries or other apparent compensation from these companies in 1985, 1986 or 1987. The corporate officer did not file a 1986 or 1987 Federal personal income tax return since the amount of income received allegedly was less than that required to be reported by the Internal Revenue Service.

20. Current accounts payable and receivable for Amerdec are approximately $16,986 and $1,000 respectively. Amerdec's tangible assets are negligible and consist of two, ten-year-old trucks and a few pieces of heavy equipment/tools in excess of 30 years of age. Amerdec leases the property at 90 Le Baron Road for approximately $1,416 per month.

COMPLIANCE ORDER

Replace the "Compliance Order" portion of the Complaint with the following provisions:

1. Respondent shall, as of the effective date of this Order, achieve compliance with the standards applicable to generators of hazardous waste, except as provided below.

2. Respondent shall immediately, upon the effective date of this Order obtain an U.S. EPA hazardous waste identification number.

3. Respondent shall immediately upon the effective date of this order repackage the hazardous waste in containers that are in good condition, and are placed in a properly secured area as required in 35 Ill. Adm. Code 725.

4. Respondent shall within 45 days of the effective date of this Order remove all non-resinous waste in storage on-site to a permitted or interim status hazardous waste facility.

5. For the resinous waste contained on-site the Respondent shall complete the following activities:

a. within 15 days of the effective date of this Order submit to IEPA an acceptable pre-treatment permit application and any other required certifications for the effluent from the treatment of the resinous waste;

b. within 60 days of the effective date of this Order ensure that the equipment necessary to treat the waste is installed and operable;

c. within 15 days after IEPA's final decision on any pre-treatment permit either complete treatment of the resinous waste or arrange for its transport off-site to a permitted or interim status hazardous waste facility. Respondent must transport all hazardous waste residues from the treatment of the resinous waste to a permitted or interim status hazardous waste facility within 15 days after IEPA's approval of any pre-treatment permit.

6. Respondent shall, within 45 days of the effective date of this Order, sumit a closure plan for the hazardous waste storage facility. The plan shall be prepared by the firm which will provide the independent registered professional engineer who will certify closure and will meet the standards for such plans contained in 35 Ill. Adm. Code Part 725 and will describe the process which the Respondent proposes to use to treat the resinous waste contained on-site. IEPA

will approve disapprove or modify this plan.

7. Within thirty (30) days of approval or modification of the closure plan, Respondent shall complete closure of the facility in accordance with the approved closure plan and shall submit a certification of closure, as required by 35 Ill. Adm. Code 725.215.

8. Respondent shall within sixty (60) days of the effective date of this Order, provide U.S. EPA with a sworn statement of compliance with the terms of this Order signed by a duly authorized officer or director of Respondent's corporation. Included with the statement shall be a copy of the manifests used to transport the non-resinous wastes off-site and a copy of the closure plan referred to in paragraph 6 above.

9. The documents identified above shall be submitted to Mrs. Barbara Russell, U.S. EPA, Region V, Waste Management Division 5HS-12, 230 South Dearborn Street, Chicago, Illinois 60604, Attention: RCRA Enforcement Branch. A copy of these documents shall also be submitted to the IEPA.

PROPOSED CIVIL PENALTY

Delete rom the Complaint the reference to the proposed penalty of "FORTY-FIVE THOUSAND DOLLARS ($45,000)" and insert in its place the following "ONE THOUSAND DOLLARS ($1,000) payable in two FIVE HUNDRED DOLLAR ($500) installments. The first and second installments are due within thirty (30) days and one hundred and twenty (120) days, respectively, of the effective date of this Order."

In addition, add the following underlined phrase to the first complete sentence on page 10 of the Complaint:

> "Attachment 1 <u>and paragrphs 16-20 of the Findings of Violation Section of this Complaint</u> provide a detailed summary of the proposed civil penalty."

Respectfully submitted by:

Richard J. Clarizio
Assistant Regional Counsel
U.S. EPA, Region V

UNITED STATES ENVIRONEMENTAL PROTECTION AGENCY

IN THE MATTER OF:	)	
	)	DOCKET NO. V-W-88-R-018
AMERDEC INC.	)	
RESPONDENT	)	

ORDER

Pursuant to Complainant's Motion to Amend the Complaint, I hereby Order the Complaint to be amended as requested by the Complainant in its Status Report, Motion to Extend Time for Pre-Hearing Exchange and Motion to Amend the Complaint (Motion). In particular, the Findings of Violation section of the Complaint is revised to include new paragraphs 16 through 20 contained in Complainant's Motion. The Order section of the Complaint is replaced with the language contained in Complainant's Motion. Finally, the penalty amount contained in the Proposed Penalty section is revised to ONE THOUSAND DOLLARS ($1,000) as specified in Complainant's Motion.

by _____
Frank W. Vanderheyden
Administrative Law Judge
U.S. EPA

Ordered this _____ day of _____, 1988.

CERTIFIED MAIL
RETRUN RECEIPT REQUESTED

Mr. Thomas Allegretti
Amerdec, Inc.
90 LeBaron
Waukegan, Illinois 60085

Dear Mr. Allegretti:

I am writing this letter to provide you with an opportunity to review, in writing, the steps the United States Environmental Protection Agency (USEPA) believes are necessary to settle the complaint that was issued against Amerdec and to summarize our May 27, 1988, discussions. Attached is a draft Compliance Agreement and Final Order (CAFO) which details the actions which Amerdec must take to resolve the allegations contained in the complaint. The dates negotiated in a CAFO must be specific and must be achieved. We cannot agree to deadlines which are contingent on the availability of money. Consequently, when reviewing this draft CAFO please pay particular attention to the dates specified in it. If you are interested in settling this complaint, please provide us with your comments on the draft CAFO by June 28, 1988.

As you stated in our call on May 27, 1988, we now look forward to receiving the completed USEPA identification number application and photos of the drums and trucks by June 3, 1988. As of today's date we have received the application and await the photos.

I realize that we presently disagree about the appropriateness of a penalty. The attached draft CAFO has reduced the penalty from $45,000 to $30,000 already, and the Agency's RCRA Civil Penalty Policy (copy attached) provides that additional reductions can be made in appropriate "financial hardship" cases. However, such additional reductions can only be made based on solid, reliable financial data. As I indicated during the call I cannot guarantee that we will further reduce the penalty amount but the following information will assist us in determining the appropriateness of any further reductions.

1. 1987 draft Amerdec tax return signed by the appropriate Amerdec officer;
2. Your 1986 and 1987 personal tax return;
3. An Amerdec balance sheet for the past two years which shows, at a minimum, the following:

   - salaries of officers and employees,
   - equipment and inventory on hand and their value,

- amount of money owed to Amerdec and the amount that Amerdec owes,
- copy of any agreements which show Amerdec's indebtedness,
- all assets and liabilities of Amerdec,
- present net worth of the corporation

You are under no obligation to submit the above information, but I believe that you agreed to submit it by June 10, 1988. As a result of discussions with Mrs. Allegretti on June 9, 1988, we understand that you will need additional time to provide this information. We now expect it by June 28, 1988. The more complete you are in the information the better we will be able to determine the appropriateness of the penalty.

If we receive all of the information discussed above by the dates specified we will review the information and contact you by July 6, 1988, with our analysis. If we do not receive the information by June 28, 1988, we will assume that you are not interested in settling this complaint. At that time we will advise the Administrative Law Judge that settlement negotiations have stalled and that we need his assistance in settling the complaint. If I can be of any assitance or if you have any questions please do not hesitate to contact me at 886-0559 or Ms. Russell at 353-7922.

Sincerely,

Richard J. Clarizio
Assistant Regional Counsel