ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

BUREAU OF LAND / FIELD OPERATIONS SECTION

RCRA INSPECTION REPORT

RECEIVED
MAR 01 2000
IEPA-DLPC

GENERAL FACILITY INFORMATION

USEPA ID #:	ILD005450697	IEPA ID #:	0316000053
Facility Name:	Safety-Kleen Corporation Chicago RC	Phone #:	312/247-2828
Location:	1445 West 42nd Street	County:	Cook
City:	Chicago	State: IL	Zip Code: 60609
Region:	2	Inspection Date: 1/18/00	Time: 8:30am-2:30pm
Weather:			

TYPE OF FACILITY

Notified As:	G, Trans, TSD, WAF, OSF	Regulated As:	G, S, T, WAF

TYPE OF INSPECTION

CEI: XX	CME/O&M:	CSI:	NRR:	CCI:	PIF:	CVI:	CSE:	CAO:
FUI to:		Other:						

NOTIFICATION INFORMATION (EPA 8700-12)

Notification Date: 8/5/80	(initial)	(subsequent)

PART A PERMIT INFORMATION (EPA 3510-3 OR EPA 8700-23)

Part A Date:	11/19/80	Amended:	9/24/90	Withdrawn:	

PART B PERMIT INFORMATION

(check one if applicable)	Application Submitted? 11/19/88	Permit Issued?	Yes	Date:	9/30/92

ACTIVE ENFORCEMENT N/A

Date facility was referred to:	USEPA:	IAGO:	County State's Attorney:

ACTIVE ENFORCEMENT ORDERS N/A

CACO:	CAFO:	Federal Court Order:
Consent Decree:	IPCB Order:	State Court Order:

TSD Facility Activity Summary

Activity by Process Code	On Part A?	On Part B?	Activity ever done?	Closed?	Being done during insp?	Exempt per 35 IAC Sec:	On Annual Report: 98	97	96
S01	Yes	Yes	Yes	No	Yes	N/A	Yes	Yes	Yes
S02	Yes	Yes	Yes	No	Yes	N/A	Yes	Yes	Yes
R03	N/A	Yes	Yes	N/A	Yes	725.101(c)(b)	No	No	No

Owner

Name: Safety-Kleen Corp.
Address: 1000 Randall Road
City: Elgin
State: IL **Zip Code:** 60123
Phone #: 847/697-8460

Operator

Name: Safety-Kleen Corp. Chicago RC
Address: 1445 West 42nd Street
City: Chicago
State: IL **Zip Code:** 60609
Phone #: 312/247-2828

Person(s) Interviewed	Title	Phone #
Alfred Aghapour	Facility Manager	773/650-1467
Ted Zajack	Operations Manager	773/650-1468
Bob Burke	Safety & Envir. Mgr.	312/247-2828

Inspection Participants	Agency/Bureau	Phone #
* Anna Van Orden	IEPA/BOL	708/338-7900
Emilio Salis	IEPA/BOA	708/338-7900
Marcus Hatch	IEPA/BOA	708/338-7900
Nick Relwani	IEPA/BOA	708/338-7900

*Report prepared by this person.

Safety-Kleen Corp. Chicago RC
0316000053 ILD005450697
January 18, 2000

RECEIVED
MAR 01 2000
IEPA-DLPC

NARRATIVE
By Anna Van Orden

The Safety-Kleen Chicago RC(SKCRC) is an organic chemicals reclamation and recycling facility permitted to treat and store hazardous waste under a Part B Permit.

The SKCRC accepts organic chemicals and solvent wastes from industrial and commercial facilities. Reclamation and recycling operations involve either regeneration of the spent solvent or blending and processing of the material for use as a hazardous waste fuel.

Processes utilized in the reclamation of used solvents, solvent mixtures and other solvent containing wastes include neutralization, distillation, fractionation, liquid-liquid extraction and drying.

SKCRC handles primarily two accounts:

1) The Toll Business - The toll customer (generally industrial accounts) ships waste or off-specification material to the SKCRC for treatment. The facility reclaims the material to the customer's specifications and returns the material to the generator.

2) The Recycling Business - The recycling business consists of industrial solvents which come to the SKCRC from Safety-Kleen sales network. These waste materials are recycled at the facility to Safety-Kleen corporate specifications and the processed material is sold as product on the market.

HAZARDOUS WASTE UNITS

TYPE	ACTIVE	CLOSED	WASTES	SIZE/ CAPACITY	(D)IKED;(C)ONCRETE/DIR(T)/ (G)RAVEL FLOOR;TYPE OF SECONDARY CONTAINMENT
SO1	Y	N	Numerous, See Part B	108,900 Gallons	D; C; Catch Basin
SO2	Y	N	Numerous, See Part B	1,119,865 Gallons	D; C; Vault w/coating on concrete

HAZARDOUS WASTES

Still Bottoms - FOO1-FOO2, and D001-D00X

- Residual material from the distillation process
- Shipped to Safety-Kleen in Clarksville, MO or Dolton, IL for fuel recovery.
- Rate of generation: ~24,671 gal/month
- Amount on site: 18,323 gallons

Spent Solvent - DOO1, D006, D008, D018, D035, D040

- Waste generated from two parts washers and one immersion cleaner unit.
- Shipped to Safety-Kleen in Dolton, IL for reclamation.
- Rate of generation: 30-40 gallons quarterly
- Amount on site: 0

Hazardous Waste Solids - FOO1, FOO2 and D001-D00X

- Waste generated by various methods:
  - Cleaning out tanks
  - Used oil dry
  - Hose drippings
  - Cut drums in order to remove solid material
  - Used filters from filtering material from waste and product tanks
- Shipped to Safety-Kleen in Hebron, OH for fuel blending/
- Rate of generation: 8 drums/month
- Amount on site: 12 drums

Remanifasted Waste - F003, D001

- Waste generated from manifesting errors and temporary storage.
- Shipped to Safety/Kleen in Clarksville, MO for fuel blending
- Rate of Generation: Last shipment 1/3/00
- Amount on-site: 0

OBSERVATIONS

A multi-media inspection with BOA was conducted for compliance of aa (air emission standards for process vents), bb (air emission standards for equipment leaks), and cc (air emission standards for tanks and container) requirements. Facility was in compliance with all record keeping and notification requirements.

An updated Closure Cost submitted January 29, 1999 and an updated Financial Assurance submitted January 30, 1999.

The second year of the second round of tank inspections was completed November 1999. Tank T-13 was found to have several cracks on the bottom and taken out of service and to be inspected more closely.

At the time of the inspection, this facility was regulated as a generator, treatment, storage facility and marketer of waste fuel. The facility appeared to be in compliance with all applicable RCRA regulations and their Part B Permit requirements.

RCRA Part B Inspection Site # 0316000053

Section I: Containers

	Compliance
A. Hazardous Waste Management Units	(YES) NO
B. Waste Identification	(YES) NO
C. Condition of Containers	(YES) NO
D. Compatibility of Containers	(YES) NO
E. Management of Containers	(YES) NO
F. Inspections	(YES) NO
G. Containment	(YES) NO
H. Ignitable or Reactive Wastes	(YES) NO
I. Special Requirements for Incompatible Wastes	(YES) NO
J. General Operating Requirements	(YES) NO
K. Closure Requirements	(YES) NO

Description of violation:

_____

_____

_____

Section II: Tank Systems

	Compliance
B. Waste Identification	(YES) NO
C. Containment and Detection of Releases	(YES) NO
D. General Construction Requirements	(YES) NO
E. General Operating Requirements	(YES) NO

F. Tank System Certification	(YES) NO
G. Response to Leaks or Spills	(YES) NO
H. Inspections	(YES) NO
I. Reporting and Recordkeeping	(YES) NO
J. Ignitable and Reactive Wastes	(YES) NO
K. Special Requirements for Incompatible Wastes	(YES) NO
L. Closure	(YES) NO

Description of violations:

_____

_____

Section III: Reporting and Notification Requirements

	Compliance
Containers	(YES) NO
Tank Systems	(YES) NO
Corrective Action	(YES) NO
Standard Conditions	(YES) NO
Additional Special Conditions	(YES) NO

Description of violations:

_____

_____

Section IV: Corrective Action

	Compliance
E. Financial Assurance for Corrective Action	(YES) NO
F. Notification Requirements for and Assessment of Newly-Identified Solid Waste Management Unit(s)	(YES) NO
G. Future Releases from SWMUs	(YES) NO
H. Completion of Corrective Action	(YES) NO

Description of violations:

Section V: Standard Conditions

	Compliance
A. General Requirements	(YES) NO
B. General Facility Standards	(YES) NO
C. Preparedness and Prevention	(YES) NO
D. Contingency Plan	(YES) NO
E. Manifest System, Recordkeeping and Reporting	(YES) NO
F. Closure	(YES) NO
G. Land Disposal Restrictions	(YES) NO

Description of violations:

Facility Name:	SAFETY-KLEEN CORP CHICAGO RC
USEPA #: IL	D005450697
IEPA #:	0316000053

WASTE DISPOSITION FORM

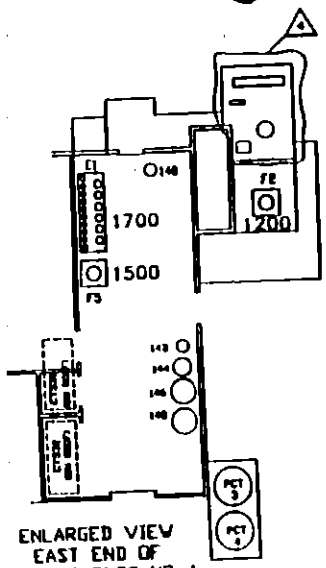
1/18/00

Waste Name (include haz & waste for which no determination has been made)	Generating Process (For waste gen. on site. N/A for TSD	Date of Last Analysis	USEPA Haz Waste #	*On 8700-12	*On 3510-3	On Annual Report for: (Circle if present; cross out if not present) *19 98	*19 97	*19 96	Amount on Site	Rate of Generation	Last manifested Shipment	Disposition
Still Bottoms	Residue from distillation process	Every Shipment Analyzed	F001-5 D001-X	Y	Y	G F	G F	G F	18,323 gallons	24,671 gal/month	1/14/00	S/K Clarksville, MO & S/K Dolton, IL Fuel Recovery
Spent Solvent	2 Parts Washers 1 Immersion Unit		D001 D018 D039	Y	Y	G F	G F	G F	0	Approx. 30-40 gal/month	5/7/99	Safety-Kleen Elgin, IL Reclamation/RC
Haz. Solid Waste	From spills, clean-ups & processing filters		F001-5 D001-X	Y	Y	G F	G F	G F	8 Drums	Approx. 91 drums/year	11/19/99	Safety-Kleen Hebron, OH Fuel blending
Remanifested Waste	Errors & Temp. storage		F003 D001	Y	Y	G F	G F	G F	0	1X shipment	1/3/00	Safety/Kleen Clarksville, MO.
						G F	G F	G F				
						G F	G F	G F				
						G F	G F	G F				
						G F	G F	G F				
						G F	G F	G F				
						G F	G F	G F				

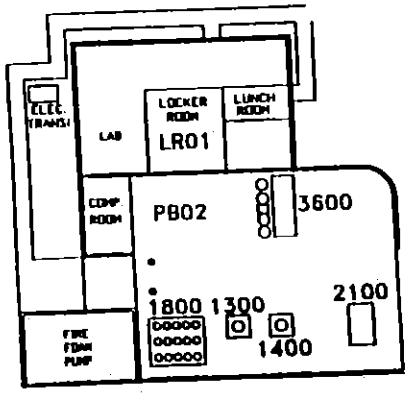
*All "NO" responses must be explained in narrative

SAFETY KLEEN CORP. CHICAGO RC
0316000053 ILD005450697
January 18, 2000

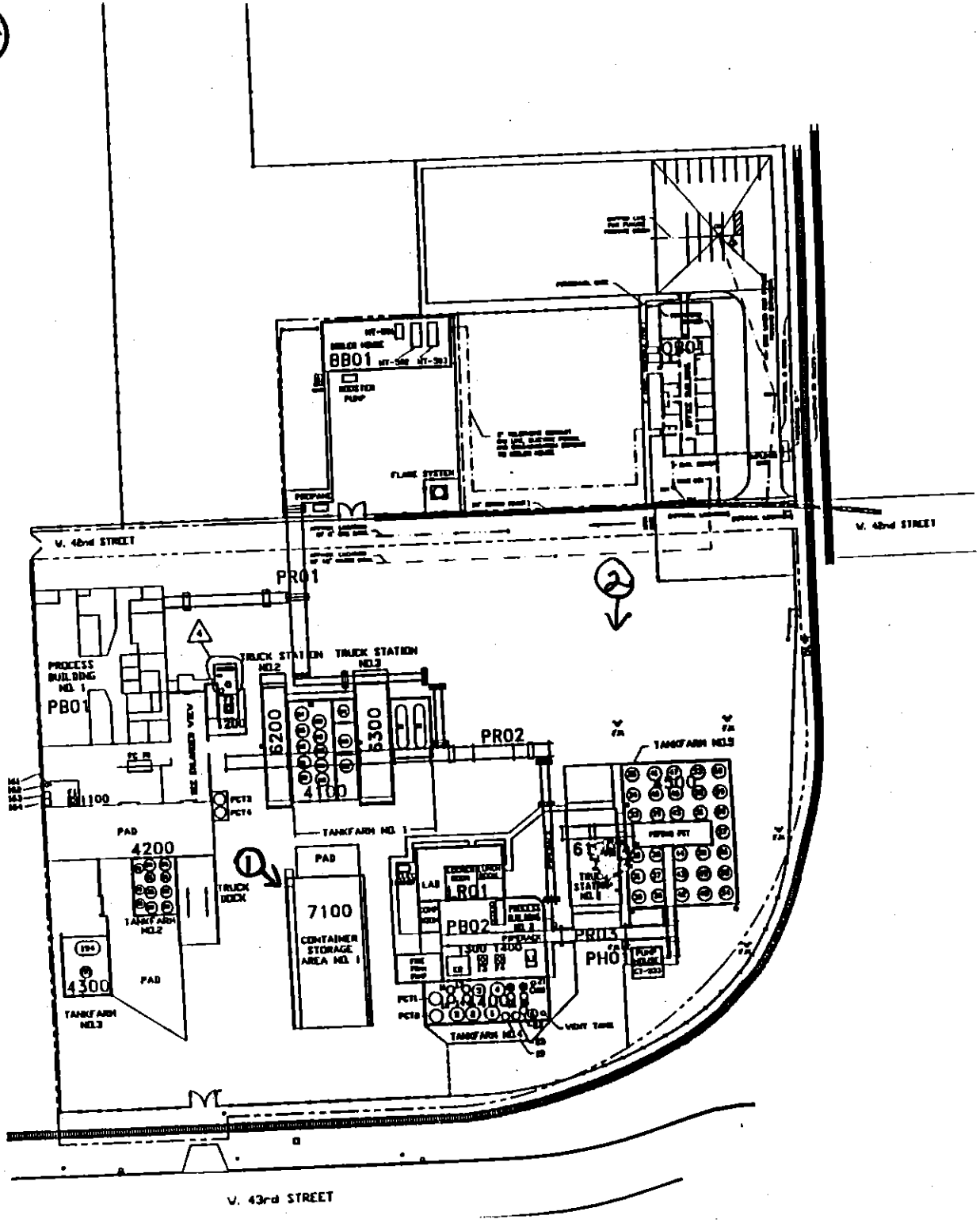
Photos



ENLARGED VIEW
EAST END OF
PROCESS BLDG NO. 1



ENLARGED VIEW
PROCESS BLDG NO.2



State of Illinois
ENVIRONMENTAL PROTECTION AGENCY

Mary A. Gade, Director

1701 First Avenue, Maywood, IL 60153

708/338-7900

February 1, 2000

Safety-Kleen Corporation
Attn: Mr. Alfred Aghapour
1445 West 42nd Street
Chicago, IL 60609

RECEIVED
MAR 01 2000
IEPA-DLPC

Re: 0316000053 -- Cook County
Safety-Kleen Corp. Chicago RC
ILD005450697
Compliance File

Dear Mr. Aghapour:

On January 18, 2000, an inspection of the above referenced site was conducted by Anna VanOrden representing the Illinois Environmental Protection Agency. The purpose of this inspection was to determine the site's compliance with the Illinois Environmental Protection Act and 35 Illinois Administrative Code Part 722, Subparts A through G; Part 726, Subpart D; Part 728, Subparts A through E and your Part B Permit (excluding groundwater monitoring and financial requirements).

No violations were noted at the time of this inspection. For your information, a copy of the inspection report is enclosed.

Should you have any questions regarding this inspection, please contact Anna VanOrden at 708/338-7900.

Sincerely,

Clifford Gould, Reginal Manager
Field Operations Section
Bureau of Land

bcc: Division File
Maywood Region

Illinois Environmental Protection Agency
Division of Land Pollution Control

RCRA INSPECTION REPORT

USEPA #: IL D005450697		IEPA #: 0316000053	
Facility Name: Safety-Kleen Corporation Chicago RC		Phone #: 312/247-2828	
Street Address: 1445 West 42nd Street		County: Cook	
City: Chicago	State: IL	Zip: 60609	
Region: 2	Inspection Date: 1 / 21 / 99	From: 1:30PM	To: 3:15PM
Weather:			

TYPE OF FACILITY

Notified As: G, Trans, TSD, WAF, OSF	Regulated As: G, S, WAF
LDF? No (Yes or No) HPV? No	90-Day F/U Required?: YES ____ NO XXX

TYPE OF INSPECTION

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

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

NON-REGULATED STATUS N/A

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

PART A

Notification Date: 8 / 5 / 80 , from (initial) or (subsequent) Notification.

Initial Part A Date: 11 / 19 / 80 Amended: 9 / 24 / 90

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

RECEIVED MAR 17 1999 IEPA DLL

PART B PERMIT APPLICATION

Part B Permit Submitted: Y or N 11 / 19 / 88 Final Permit Issued: 9 / 30 / 92

ENFORCEMENT N/A

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

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

ORDERS ISSUED N/A

CACO: ___/___/___ CAFO: ___/___/___ Consent Decree: ___/___/___

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

TSD FACILITY ACTIVITY SUMMARY

Activity by Process Code	On Part A?	Activity Conducted Prior to 1980?	Was Activity Ever Done?	Closed	Being done at Time of Insp.?	Exempt per 35 IAC, Sec.	On Annual Report 1993	1992	1991
S01	Yes	Yes	Yes	No	Yes	N/A	Yes	Yes	Yes
S02	Yes	Yes	Yes	No	Yes	N/A	Yes	Yes	Yes
R03	N/A	Yes	Yes	N/A	Yes	725.101(c)(b)	No	No	No

OWNER		OPERATOR	
Name	Safety-Kleen Corporation	Name	Safety-Kleen Corp. Chicago RC
Address	1000 North Randell Road	Address	1445 W. 42nd Street
City	Elgin	City	Chicago
State	IL Zip 60123	State	IL Zip 60609
Phone #	708/697-8460	Phone #	312/247-2828

PERSON(S) INTERVIEWED	TITLE	PHONE #
Alfred Aghapour	Facility Manager	312/247-2828
Ted Zajack	Operations Manager	312/247-2828
Christopher Koepfle	Prod. Supervisor	312/247-2828
Bob Burke	Safety & Envir. Mgr.	312/247-2828

INSPECTION PARTICIPANT(S)	AGENCY/TITLE	PHONE #
Anna Van Orden	IEPA/EPS	708/338-7900

PREPARED BY	AGENCY/TITLE	PHONE #
Anna Van Orden	IEPA/EPS	708/338-7900

SUMMARY OF APPARENT VIOLATIONS

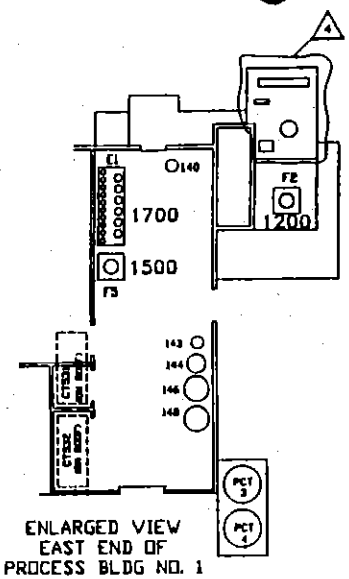
Area	Class	Section

Area	Class	Section

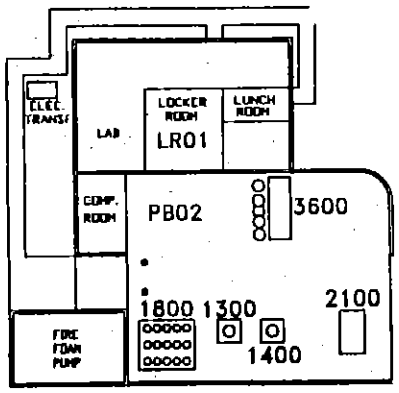
Area	Class	Section

SAFETY KLEEN CORP. CHICAGO RC
0316000053 ILD005450697
JANUARY 21, 1999

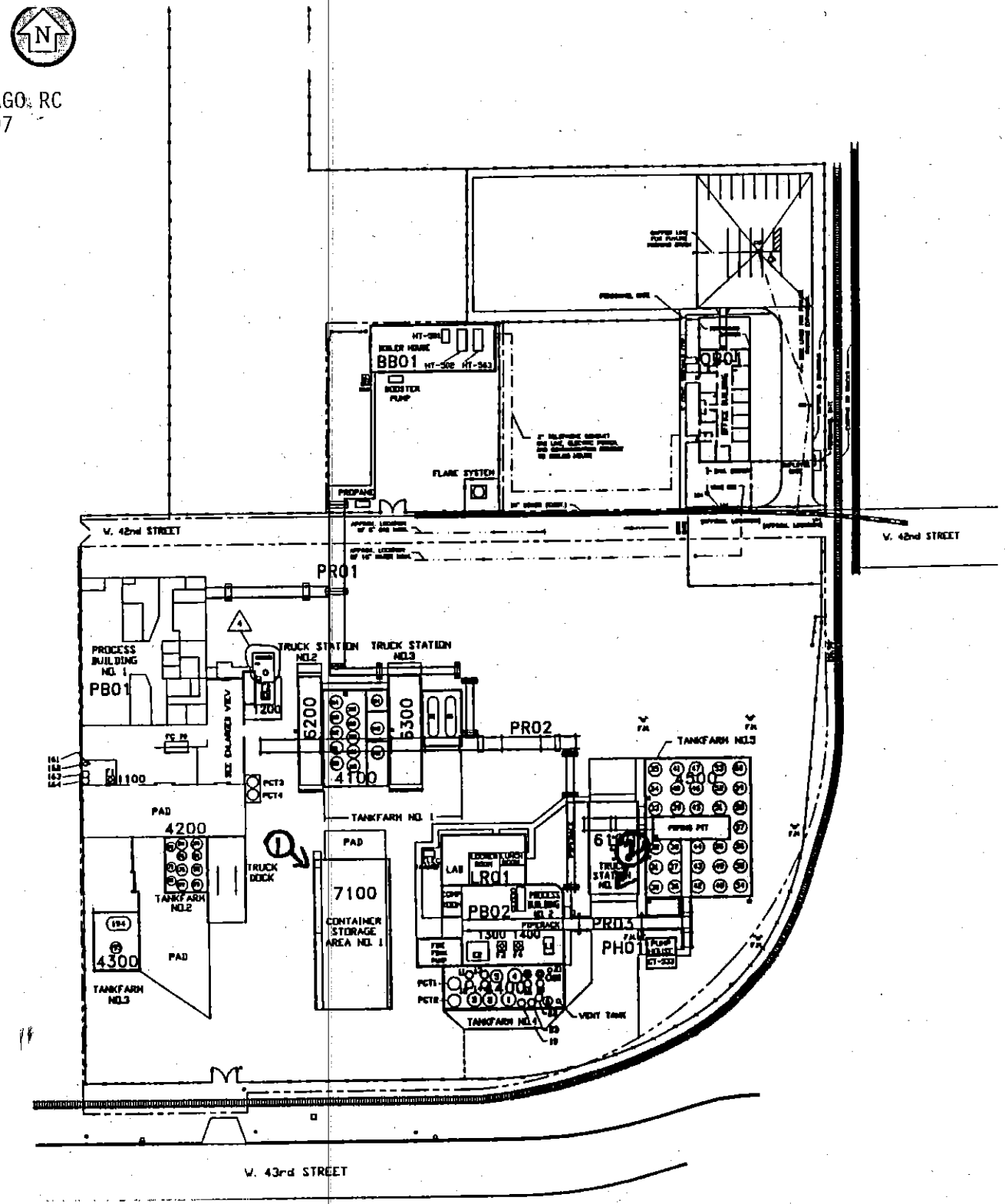
Photos



ENLARGED VIEW
EAST END OF
PROCESS BLDG NO. 1



ENLARGED VIEW
PROCESS BLDG NO.2



Facility Name: SAFETY-KLEEN CORP CHICAGO RC

USEPA #: IL D005450697

IEPA #: 0316000053

WASTE DISPOSITION FORM

1/21/99

Waste Name (include haz & waste for which no determination has been made)	Generating Process (For waste gen. on site. N/A for TSD	Date of Last Analysis	USEPA Haz. Waste #	*On 8700-12	*On 3510-3	On Annual Report for: (Circle if present; cross out if not present) *19 97	*19 96	*19 95	Amount on Site	Rate of Generation	Last manifested Shipment	Disposition
Still Bottoms	Residue from distillation process	Every Shipment Analyzed	F001-5 D001-X	Y	Y	G F	G F	G F	23,520 gallons & 31 Drums	38,000 gal/month	1/12/99	S/K Clarksville, MO & Continental Cement Group (Hannibal, MO) Fuel Recovery
Spent Solvent	2 Parts Washers 1 Immersion Unit		D001 D018 D039	Y	Y	G F	G F	G F	0	Approx. 30-40 gal/month	10/16/98	Safety-Kleen Dolton, IL Reclamation/RC
Haz. Solid Waste	From spills, clean-ups & processing filters		F001-5 D001-X	Y	Y	G F	G F	G F	6 Drums	9 Drum/month	1/5/99	Safety-Kleen Hebron, OH Fuel blending
Remanifested Waste	Errors & Temp. storage		F003 D001	Y	Y	G F	G F	G F	0	1X shipment 4,874 gals	6/23/98	Safety/Kleen Clarksville, MO Reclaimed
RQ Haz Waste Liquid	Process wastewater		F001	Y	Y	G F	G F	G F	12 Drums	5,000 gals every 6 months	12/1/98	Safety/Kleen Dolton, IL Treatment
						G F	G F	G F				
						G F	G F	G F				
						G F	G F	G F				
						G F	G F	G F				

*All "NO" responses must be explained in narrative

Safety-Kleen Corp. Chicago RC
0316300053 ILD005450697
January 21, 1999

RECEIVED
MAR 17 1999
IEPA-DLPC

NARRATIVE
Prepared by Anna VanOrden

The Safety-Kleen Chicago RC(SKCRC) is an organic chemicals reclamation and recycling facility permitted to treat and store hazardous waste under a Part B Permit.

The SKCRC accepts organic chemicals and solvent wastes from industrial and commercial facilities. Reclamation and recycling operations involve either regeneration of the spent solvent or blending and processing of the material for use as a hazardous waste fuel.

Processes utilized in the reclamation of used solvents, solvent mixtures and other solvent containing wastes include neutralization, distillation, fractionation, liquid-liquid extraction and drying.

SKCRC handles primarily two accounts:

1) **The Toll Business** - The toll customer (generally industrial accounts) ships waste or off-specification material to the SKCRC for treatment. The facility reclaims the material to the customer's specifications and returns the material to the generator.

2) **The Recycling Business** - The recycling business consists of industrial solvents which come to the SKCRC from Safety-Kleen sales network. These waste materials are recycled at the facility to Safety-Kleen corporate specifications and the processed material is sold as product on the market.

HAZARDOUS WASTE UNITS

TYPE	ACTIVE	CLOSED	WASTE	SIZE/CAPACITY	(D)IKED;(C)ONCRETE/DIR(T)/ (G)RAVEL FLOOR;TYPE OF SECONDARY CONTAINMENT
SO1	Y	N	Numerous, See Part B	108,900 Gallons	D; C; Catch Basin
SO2	Y	N	Numerous, See Part B	1,119,865 Gallons	D; C; Vault w/coating on concrete

HAZARDOUS WASTES

Still Bottoms - FOO1-FOO2, and D001-D00X

- Residual material from the distillation process
- Shipped to Safety-Kleen in Clarksville, MO for fuel blending or reclamation.
- Rate of generation: 30,000 - 40,000 gal/month
- Amount on site: 23,520 gallons in bulk and 31/55 gallon drums.

Spent Solvent - DOO1, D006, D008, D018, D035, D040

- Waste generated from two parts washers and one immersion cleaner unit.
- Shipped to Safety-Kleen in Dolton, IL for reclamation.
- Rate of generation: 30-40 gallons quarterly
- Amount on site: 0

Hazardous Waste Solids - FOO1, FOO2 and D001-D00X

- Waste generated by various methods:
  - Cleaning out tanks
  - Used oil dry
  - Hose drippings
  - Cut drums in order to remove solid material
  - Used filters from filtering material from waste and product tanks
- Shipped to Safety-Kleen in Hebron, OH for fuel blending
- Rate of generation: ~ 9/55 gallon drums/month
- Amount on site: 6/55 gallon drums

Remanifasted Waste - F001, F002, F003, D001, D002, D027

- Waste generated from manifesting errors and temporary storage.
- Shipped to Clarksville, MO recovery.
- Rate of Generation: 5,000 gallons/month.
- Amount on-site: 0

RQ Waste Flammable Liquid - F001

- Waste generated from processes utilized at the site.
- Shipped to Safety-Kleen in Dolton, IL for fuel treatment.
- Rate of generation: 5,000 gallons/month.
- Amount on-site: 12/55 gallon drums

RECEIVED
MAR 17
IEPA-DLC

OBSERVATIONS

The facility submitted a Part B modification for the revised name from Safety-Kleen Corporation to Safety-Kleen Systems, Inc. The modification also allows the facility in situations when the high level alarm or automatic shut off system is not operational, to use the manual oversight procedures outlined in Section II.E.c.1a-e, for no more than 90 days from the date the alarm or shut off system is identified as nonfunctional.

An internal inspection was completed on sixteen hazardous waste tanks which consisted of tank farms #1, 2, 3. This was the beginning of second round of such an inspection which is the agreed schedule of every five years.

An updated Financial assurance was submitted to the Agency on 8/26/98.

The facility has converted to 200 gallon totes to accumulate hazardous waste generated in truck stations under the 90 days rule.

At the time of the inspection, this facility was regulated as a generator, treatment, storage facility and marketer of waste fuel. The facility appeared to be in compliance with all applicable RCRA regulations and their Part B Permit requirements.

Subpart CC Annual Tank Inspection

Inspection Date: 12/4/98 **Inspector:** Bob Burke

Time began: 8:30 am

Chicago Level 1 Hazardous Waste Tanks							
Tank #	Tank Farm	Material of Construction	Dimensions Height	Dimensions Diameter	Capacity (gallons)	Status	Inspection Results
1	4	Stainless Steel	20'	11'-6"	12,500	Chilled-Vent Condenser	OK
2	4	Stainless Steel	20'	11'-6"	12,500		OK
3	4	Stainless Steel	20'	11'-6"	12,500		OK
4	4	Stainless Steel	20'	11'-6"	12,500		OK
5	4	Stainless Steel	18'-5"	9'-3"	8,000		OK
6	4	Stainless Steel	19'	10'	8,000		OK
11	4	Stainless Steel	19'	6'-2"	3,500		OK
12	4	Stainless Steel	19'	6'-2"	3,500		OK
13	4	Stainless Steel	19'	6'-2"	3,500		OK
14	4	Stainless Steel	19'	6'-2"	3,500		OK
15	4	Stainless Steel	19'	6'-2"	3,500		OK
16	4	Stainless Steel	19'	6'-2"	3,500		OK
17	4	Stainless Steel	19'	6'-2"	3,500		OK
18	4	Stainless Steel	19'	6'-2"	3,500		OK
19	4	Stainless Steel	19'	6'-2"	3,500		OK
20	4	Stainless Steel	12'-2"	5'	1,000		OK
21	4	Stainless Steel	6'-5"	4'	500		OK
22	4	Stainless Steel	18'-9"	6'-6"	3,500		OK
23	4	Stainless Steel	18'-9"	6'-6"	3,500		OK
30A	5	Stainless Steel	32'-5"	10'-5"	7,500	Carbon Canister	OK
30B	5	Stainless Steel			7,500		OK
31	5	Stainless Steel	32'-5"	10'-5"	15,000		OK
32	5	Stainless Steel	32'-5"	10'-5"	15,000		OK
33	5	Stainless Steel	32'	10'-6"	15,000		OK
34A	5	Stainless Steel	32'-5"	10'-6"	7,500	Carbon Canister	OK
34B	5	Stainless Steel			7,500		OK
35A	5	Stainless Steel	32'-5"	10'-6"	7,500		OK
35B	5	Stainless Steel			7,500		OK
36	5	Stainless Steel	32'-5"	10'-6"	15,000	Carbon Canister	OK
37A	5	Stainless Steel	32'-5"	10'-6"	7,500	Carbon Canister	OK
37B	5	Stainless Steel			7,500		OK
38	5	Stainless Steel	32'-5"	10'-6"	15,000		OK
39	5	Carbon Steel	32'	10'-6"	15,000		OK
40A	5	Carbon Steel	32'-5"	10'-6"	7,500	Carbon Canister	OK
40B	5	Carbon Steel			7,500		OK

Chicago Level 1 Hazardous Waste Tanks							
Tank #	Tank Farm	Material of Construction	Dimensions Height	Dimensions Diameter	Capacity (gallons)	Status	Inspection Results
41A	5	Carbon Steel	32'-5"	10'-6"	7,500		OK
41B	5	Carbon Steel			7,500		OK
42	5	Stainless Steel	32'-5"	10'-6"	15,000	N.P. Carbon Canister	OK
43	5	Stainless Steel	32'-5"	10'-6"	15,000		OK
44	5	Stainless Steel	32'-5"	10'-6"	15,000		OK
45	5	Carbon Steel	32'-5"	10'-6"	15,000		OK
46A	5	Carbon Steel	32'-5"	10'-6"	7,500		OK
46B	5	Carbon Steel			7,500		OK
47A	5	Carbon Steel	32'-5"	10'-6"	7,500		OK
47B	5	Carbon Steel			7,500		OK
48A	5	Stainless Steel	32'-5"	10'-6"	7,500	N.P. Carbon Canister	OK
48B	5	Stainless Steel			7,500	N.P.	OK
49A	5	Stainless Steel	32'-5"	10'-6"	7,500		OK
49B	5	Stainless Steel			7,500		OK
50	5	Stainless Steel	32'-5"	10'-6"	15,000		OK
51	5	Carbon Steel	32'	10'-6"	15,000		OK
52A	5	Carbon Steel	32'-5"	10'-6"	7,500		OK
52B	5	Carbon Steel			7,500		OK
53A	5	Carbon Steel	32'-5"	10'-6"	7,500		OK
53B	5	Carbon Steel			7,500		OK
61	6	Stainless Steel	33'	10'-6"	18,500	Proposed	N/A
62	6	Stainless Steel			18,500	Proposed	
63	6	Stainless Steel			18,500	Proposed	
64	6	Stainless Steel			18,500	Proposed	
65	6	Stainless Steel			18,500	Proposed	
66	6	Stainless Steel			18,500	Proposed	
67	6	Stainless Steel			18,500	Proposed	
68	6	Stainless Steel			18,500	Proposed	
69	6	Stainless Steel			18,500	Proposed	
70	6	Stainless Steel			18,500	Proposed	
85	7	Stainless Steel			18,500	Proposed	
86	7	Stainless Steel			18,500	Proposed	
87	7	Stainless Steel			18,500	Proposed	
88	7	Stainless Steel			18,500	Proposed	
89	7	Stainless Steel			18,500	Proposed	
90	7	Stainless Steel			18,500	Proposed	
91	7	Stainless Steel			18,500	Proposed	
92	7	Stainless Steel			18,500	Proposed	
93	7	Stainless Steel			18,500	Proposed	
94	7	Stainless Steel			18,500	Proposed	
102	1	Stainless Steel	19'-2"	11'	12,500		OK

Chicago Level 1 Hazardous Waste Tanks							
Tank #	Tank Farm	Material of Construction	Dimensions Height	Dimensions Diameter	Capacity (gallons)	Status	Inspection Results
103	1	Stainless Steel	20'-2"	11'-6"	12,500		OK
104	1	Stainless Steel	18'-5"	9'-3"	8,000		OK
115	9	Stainless Steel	32'-5"	10'-6"	15,000	Proposed	N/A
116	9	Stainless Steel			15,000	Proposed	↓
117	9	Stainless Steel			15,000	Proposed	↓
118	9	Stainless Steel			15,000	Proposed	↓
119	9	Stainless Steel			15,000	Proposed	↓
120	9	Stainless Steel			15,000	Proposed	↓
170	2	Stainless Steel	10'-2"	10'	3,500		OK
171	2	Stainless Steel	14'	8'	3,095		OK
172	2	Stainless Steel	13'-4"	10'	5,335		OK
173	2	Stainless Steel	13'-5"	10'	5,335		OK
174	2	Stainless Steel	13'-2"	10'	4,500		OK
175	2	Stainless Steel	14'	8'	3,095		OK
176	2	Stainless Steel	13'-3"	10'	5,335		OK
177	2	Stainless Steel	13'-3"	10'	5,335		OK
178	2	Stainless Steel	19'-6"	8'-8"	6,500		OK
179	2	Stainless Steel	19'-6"	8'-8"	6,500		OK
180	2	Stainless Steel	19'-6"	8'-8"	6,500		OK
182	8	Stainless Steel	33'	10'-6"	18,500	Proposed	N/A
183	8	Stainless Steel			18,500	Proposed	↓
184	8	Stainless Steel			18,500	Proposed	↓
185	8	Stainless Steel			18,500	Proposed	↓
194	3	Stainless Steel	14'	12'	11,835		OK
195	3	Stainless Steel	30'-8"	11'	17,000		OK

NOTES: OK = All closure devices and covers were operated in a closed manner.

TANK FARM # 5
TANK # 47B

DATE: See pg 1 PAGE 2
TESTED by:
MATERIAL:
VOLUME:

FLANGE LIST FOR RECYCLE CENTER

T.D. #	LOCATION / DESCRIPTION	SER.	DWG. #	SIZE & TYPE	GASKET MAT.	IN USE	DET. MET.	TEST RESULT	COMMENTS	DATE/REPAIR COMPLETED
FL-001	BOTTOM OUTLET LINE - AT TANK					Y	✓	OK		
FL-002	BOTTOM OUTLET LINE					↓	↓	↓		
FL-003	BOTTOM OUTLET LINE					↓	↓	↓		
FL-004	BOTTOM OUTLET LINE					↓	↓	↓		
FL-005	BOTTOM OUTLET LINE					↓	↓	↓		
FL-006	SIDE LINE - AT TANK					↓	↓	↓		
FL-007	BLIND - TANK SIDE					↓	↓	↓		
FL-008	BLIND - TANK SIDE					↓	↓	↓		
FL-009	LOAD LINE - AT TANK					↓	↓	↓		
FL-010	LOAD LINE					↓	↓	↓		
FL-011	LOAD LINE - IN TANKER TUNNEL					↓	↓	↓		
FL-012	LOAD LINE - IN TANKER TUNNEL					↓	↓	↓		
FL-013	M.W. SIDE HATCH					↓	↓	↓		
FL-014	BLIND 8" - SIDE OF TANK					↓	↓	↓		
FL-015	M.W. SIDE HATCH					↓	↓	↓		
FL-016	LEVEL IND. & VENT - TOP OF T-47A					↓	↓	↓		

TANK FARM # 5
TANK # 47B

DATE: See pg 1
TESTED by:
MATERIAL:
VOLUME:

PAGE 3

FLANGE LIST
FOR RECYCLE CENTER

F.D. #	LOCATION / DESCRIPTION		SER.	DWG. #	SIZE & TYPE	GASKET MAT.	IN USE	DET. MET.	TEST RESULT	COMMENTS	DATE/REPAIR COMPLETED
L-017	8" Vent System	TOP OF T-47A					✓	✓	OK		
-018	Level ind line	↓					↓	↓	↓		
-019	3"X4" vent system	↓					↓	↓	↓		

TANK FARM # 5
TANK # 47B

DATE: See Pg 1 — PAGE 4
TESTED by:
MATERIAL:
VOLUME:

OPEN END LINE LIST FOR RECYCLE CENTER

I.D. #	LOCATION / DESCRIPTION	SER.	DWG. #	CHAIN & CAP		IN USE	DET. MET.	TEST RESULT	COMMENTS	DATE/REPAIR COMPLETED
OE-001	SIDE LINE					Y	✓	OK		
OE-002	BOTTOM OUTLET LINE					N	↓	↓		
OE-003	LOAD LINE - IN TANKER TUNNEL								OS	

TANK FARM # 5
TANK # 47B

DATE: 6-18-99
TESTED by: JD
MATERIAL: ABBL OMSO crude
VOLUME: 5443

PAGE 1

VALVE LIST
FOR RECYCLE CENTER

T.D. #	LOCATION / DESCRIPTION	SER.	DWG. #	SIZE + SK #	VAL. POS.	DET. MET.	TEST RESULT	COMMENTS	DATE/REPAIR COMPLETED
V-001	BOTTOM OUTLET LINE - AT TANK				O	21	O		
V-002	BOTTOM OUTLET LINE				C	↓	↓		
V-003	BOTTOM OUTLET LINE DRAIN				C	↓	↓		
V-004	SIDE LINE - AT TANK				O	↓	↓		
V-005	SIDE LINE				C	↓	↓		
V-006	SIDE LINE DRAIN				C	↓	↓		
V-007	LOAD LINE - AT TANK				O	↓	↓		
V-008	LOAD LINE - IN TANKER TUNNEL				C	↓	↓		

FLARE MAINTENANCE LOG

Unit Down (CIRCLE AFFECTED UNITS)	Reason (DESCRIBE MAINTENANCE PERFORMED)	Total Process Unit Emissions - lbs/hr	Shut Down Date	Shut Down Time	Start Up Date	Start Up Time	Total Down Time
FLARE	SHUT DOWN FOR HOLIDAY	N/A	7-4-99	03:00	7-5-	A.M	N/A
BLOWER #1	"		7-4-99	03:00	7-5-		
BLOWER #2	"	(must be < 3.0 lbs/hr)	7-4-99	03:00	7-5		

Unit Down (CIRCLE AFFECTED UNITS)	Reason (DESCRIBE MAINTENANCE PERFORMED)	Total Process Unit Emissions - lbs/hr	Shut Down Date	Shut Down Time	Start Up Date	Start Up Time	Total Down Time
FLARE	Cleaning Flame Arrester	.427	7-6-99	1600	7-6-99	1715	1 Hr 15 min
BLOWER #1							
BLOWER #2		(must be < 3.0 lbs/hr)					

Unit Down (CIRCLE AFFECTED UNITS)	Reason (DESCRIBE MAINTENANCE PERFORMED)	Total Process Unit Emissions - lbs/hr	Shut Down Date	Shut Down Time	Start Up Date	Start Up Time	Total Down Time
FLARE		.630	7-13-99	11:15	7-13-99	11:30	15 min
BLOWER #1	Changed water						
BLOWER #2		(must be < 3.0 lbs/hr)					

Unit Down (CIRCLE AFFECTED UNITS)	Reason (DESCRIBE MAINTENANCE PERFORMED)	Total Process Unit Emissions - lbs/hr	Shut Down Date	Shut Down Time	Start Up Date	Start Up Time	Total Down Time
FLARE	Power Failure	NA Boiler was Down	7-19-99	1000	7-19-99	1100	1 Hr
BLOWER #1							
BLOWER #2		(must be < 3.0 lbs/hr)					

Unit Down (CIRCLE AFFECTED UNITS)	Reason (DESCRIBE MAINTENANCE PERFORMED)	Total Process Unit Emissions - lbs/hr	Shut Down Date	Shut Down Time	Start Up Date	Start Up Time	Total Down Time
FLARE		.3906	7/21/99	14:00	7/21/99	20:00	6 Hrs
BLOWER #1	Working on C1200 vent Lines						
BLOWER #2		(must be < 3.0 lbs/hr)					

Unit Down (CIRCLE AFFECTED UNITS)	Reason (DESCRIBE MAINTENANCE PERFORMED)	Total Process Unit Emissions - lbs/hr	Shut Down Date	Shut Down Time	Start Up Date	Start Up Time	Total Down Time
FLARE		.350	8-11-99	11:30	8-11-99	12:00	1/2 Hr
BLOWER #1	Changed H2O						
BLOWER #2		(must be < 3.0 lbs/hr)					

Unit Down (CIRCLE AFFECTED UNITS)	Reason (DESCRIBE MAINTENANCE PERFORMED)	Total Process Unit Emissions - lbs/hr	Shut Down Date	Shut Down Time	Start Up Date	Start Up Time	Total Down Time
FLARE	CHANGE WATER AND WORKING	1.24	9-2-99	08:30	9-2-99	10:00	1½ Hrs
BLOWER #1	ON EMISSIONS BY PASS VALVE						
BLOWER #2		(must be < 3.0 lbs/hr)					

SAFETY-KLEEN CORPORATION CHICAGO R/C FLARE LOG

Weather Conditions						Flare Flow Rates		Pressures at Flare Skid(psi)			Sight Glass Levels at Flare Skid		Nat. Gas Turbine		Alarms Active(Y/N)			
Temp.	Humidity	Wind Direction	Wind Speed	Baro. Pressure	LEL %	Assist Gas Flow Rate	Vent Gas Flow Rate	Water Seal Tank Inlet	ΔP at Detonation Arrestor	Gauge on Vent Water Column	Control Chamber	Vent/Water Column Pipe	Temp. In	Temp. Out	Annunciator Panels	Buzzer Panel	Chart Recorder	Name (Signature)
60	98	630	0	29.61	<5	18	40	2.0	.3	N/A	9	36	62	46	N	N	OK	Agustin R.
70	98	260	0	29.72	<5	18	40	2.2	.3	—	9	36	67	50	N	N	OK	[illegible]
54	98	630	0	29.68	<5	18	40	3.0	.3	N/A	11	36	60	45	N	N	OK	Agustin R.
73	98	230	0	29.41	<5	18	40	2.2	.3	—	12	36	52	28	N	N	OK	[illegible]
64	98	270	0	29.45	<5	18	40	2.5	.3	—	10	36	50	24	N	N	OK	[illegible]
71	98	630	0	29.69	<5	18	40	2.8	.3	—	12	36	48	22	N	N	OK	[illegible]
56	98	230	0	29.52	<5	18	40	2.8	.3	—	10	36	48	22	N	N	OK	[illegible]
65	98	120	0	29.61	<5	18	40	2.4	.3	—	10	36	52	28	N	N	OK	[illegible]
50	98	120	0	29.59	<5	18	40	2.0	.3	—	11	36	50	28	N	N	OK	Agustin R.
68	98	630	0	29.70	<5	18	40	2.2	.3	—	10	36	54	30	N	N	OK	[illegible]
52	98	630	0	29.73	<5	18	40	2.4	.3	—	9	36	52	30	N	N	OK	Agustin R.
61	—	—	0	29.70	<5	18	40	1.2	.3	—	11	36	50	24	N	N	OK	[illegible]
56	98	630	0	29.62	<5	18	40	1.2	.3	—	10	36	50	20	N	N	OK	[illegible]
63	—	230	0	29.81	<5	18	40	1.0	.3	—	8	35	54	24	N	N	OK	[illegible]
53	—	630	0	29.74	<5	18	40	1.0	.3	—	10	36	45	15	N	N	OK	[illegible]
66	—	630	0	29.77	<5	18	40	1.4	.3	—	12	36	44	18	N	N	OK	[illegible]
55	98	630	0	29.80	<5	18	40	1.2	.3	—	9	36	46	18	N	N	OK	Agustin R.
72	98	630	0	29.77	<5	18	40	1.1	.3	—	9	36	52	22	N	N	OK	[illegible]
62	98	630	0	29.70	<5	18	40	1.2	.3	—	11	36	60	30	N	N	OK	Agustin R.

SAFETY-KLEEN CORPORATION CHICAGO R/C FLARE LOG

Date/ Time	Flare Operating Y/N	Indicate Units using Flare w/X									Knockout Tank # 1 Temps			Blower # 1 Temps.		Knockout Tank # 2 Temps			Blower # 2 Temps.	
		C1100	C1200	C1300	C1400	C1500	LUWA	E1100	E1200	FC-70	Pump Outlet Gauge	Tank Level Glass	Tank Itself	Vent Building #1 Lounge	Pump (Outlet)	Pump Outlet Gauge	Tank Level Glass	Tank Itself	Vent Building #2 QC Area	Pump (Outlet)
9-9-99 0500	Yes	X	X	X	X	X					6.0	0	0	60	125	7.0	0	0	90	115
9-9-99 1200	Y	✓	✓	✓	✓	✓					6	0	0	62	126	7	0	0	94	120
9-10-99 0500	Yes	X	X	X	X	X					6.0	0	0	58	125	7.0	0	0	90	115
9-10-99 1200	Yes	✓	✓	✓	✓	✓	✓				5.5	0	0	60	128	7.0	0	0	88	124
9-11-99 0300	Yes	X	X	X	X	X					5.5	0	0	62	125	7	0	0	94	128
9-12-99 1200	Yes		✓	✓	✓	✓					5	0	0	70	126	6	0	0	92	130
9-12-99 0300	Yes		X	X	X	X	X				5.5	0	0	60	128	6	0	0	98	128
9-13-99 1200	Y	✓	✓	✓	✓	✓	✓				5	0	0	68	128	6	0	0	92	120
9-14-99 0500	Y	X	X	X	X	X	X				5	0	0	61	125	6	0	0	98	125
9-14-99 1600	Y	✓	✓	✓	✓	✓	✓				5	0	0	66	128	6	0	0	98	125
9-15-99 0500	Y	X	X	X	X	X					5	0	0	60	125	6	0	0	98	125
9-15-99 1200	Y	✓	✓	✓	✓	✓					5	0	0	61	126	6	0	0	96	124
9-16-99 0300	Y	X	X	X	X	X					5.5	0	0	60	120	6	0	0	97	120
9-16-99 1200	Y	✓	✓	✓	✓	✓					5.0	0	0	65	120	6	0	0	94	122
9-17-99 0300	Y	X	X	X	X	X					5.0	0	0	75	110	7	0	0	93	120
9-17-99 1600	Y	✓	✓	✓	✓	✓					5	0	0	70	108	7	0	0	96	122
9-18-99 0500	Y	X	X	X	X	X					5	0	0	68	110	7	0	0	90	120
9-18-99 1200	Y	✓	✓	✓	✓						5	0	0	74	112	7	0	0	94	118
9-19-99 0500	Y		X	X	X						5	0	0	70	110	7	0	0	92	118

Illinois Environmental Protection Agency
Division of Land Pollution Control

RCRA INSPECTION REPORT

USEPA #: IL D005450697	IEPA #: 0316000053
Facility Name: Safety-Kleen Corporation Chicago RC	Phone #: 312/247-2828
Street Address: 1445 West 42nd Street	County: Cook
City: Chicago	State: IL Zip: 60609
Region: 2	Inspection Date: 7 / 30 / 96 From: ____ To: ____
Weather:	

TYPE OF FACILITY

Notified As: G, Trans, TSD, WAF, OSF	Regulated As: G, S, WAF
LDF? (Yes or Not) No HPV? No	90-Day F/U Required?: YES ____ NO XXX

TYPE OF INSPECTION

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

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

NON-REGULATED STATUS N/A

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

PART A

Notification Date: 8 / 5 / 80 , from (initial) or (subsequent) Notification.

Initial Part A Date: 11 / 19 / 80 Amended: 9 / 24 / 90

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

PART B PERMIT APPLICATION

Part B Permit Submitted: (Y) or N 11 / 19 / 88 Final Permit Issued: 9 / 30 / 92

ENFORCEMENT N/A

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

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

ORDERS ISSUED N/A

CACO: ___ / ___ / ___ CAFO: ___ / ___ / ___ Consent Decree: ___ / ___ / ___

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

TSD FACILITY ACTIVITY SUMMARY

Activity by Process Code	On Part A?	Activity Conducted Prior to 1980?	Was Activity Ever Done?	Closed	Being done at Time of Insp.?	Exempt per 35 IAC. Sec.	On Annual Report 1993	1992	1991
S01	Yes	Yes	Yes	No	Yes	N/A	Yes	Yes	Yes
S02	Yes	Yes	Yes	No	Yes	N/A	Yes	Yes	Yes
R03	N/A	Yes	Yes	N/A	Yes	725.101(c)(b)	No	No	No

RECEIVED
AUG 23 1996
IEPA-DLPC

OWNER		OPERATOR	
Name	Safety-Kleen Corporation	Name	Safety-Kleen Corp. Chicago RC
Address	1000 North Randell Road	Address	1445 W. 42nd Street
City	Elgin	City	Chicago
State	IL Zip 60123	State	IL Zip 60609
Phone #	708/697-8460	Phone #	312/247-2828

PERSON(S) INTERVIEWED	TITLE	PHONE #
Alfred Aghapour	Facility Manager	312/247-2828
Ted Zajack	Operations Manager	312/247-2828

INSPECTION PARTICIPANT(S)	AGENCY/TITLE	PHONE #
Anna Van Orden	IEPA/EPS	708/338-7900

PREPARED BY	AGENCY/TITLE	PHONE #
Anna Van Orden	IEPA/EPS	708/338-7900

SUMMARY OF APPARENT VIOLATIONS

Area	Class	Section

Area	Class	Section

Area	Class	Section

RECEIVED
AUG 23 1996
IEPA-DLPC

Safety-Kleen Corp. Chicago RC
0316000053 ILD005450697
July 30, 1996

Narrative prepared by:
Anna Van Orden

NARRATIVE

The Safety-Kleen Chicago RC(SKCRC) is an organic chemicals reclamation and recycling facility permitted to treat and store hazardous waste under a Part B Permit.

The SKCRC accepts organic chemicals and solvent wastes from industrial and commercial facilities. Reclamation and recycling operations involve either regeneration of the spent solvent or blending and processing of the material for use as a hazardous waste fuel.

Processes utilized in the reclamation of used solvents, solvent mixtures and other solvent containing wastes include neutralization, distillation, fractionation, liquid-liquid extraction and drying.

SKCRC handles primarily two accounts:

1) The Toll Business - The toll customer (generally industrial accounts) ships waste or off-specification material to the SKCRC for treatment. The facility reclaims the material to the customer's specifications and returns the material to the generator.

2) The Recycling Business - The recycling business consists of industrial solvents which come to the SKCRC from Safety-Kleen sales network. These waste materials are recycled at the facility to Safety-Kleen corporate specifications and the processed material is sold as product on the market.

HAZARDOUS WASTE UNITS

TYPE	ACTIVE	CLOSED	WASTES	SIZE/ CAPACITY	(D)IKED;(C)ONCRETE/DIR(T)/ (G)RAVEL FLOOR;TYPE OF SECONDARY CONTAINMENT
SO1	Y	N	Numerous, See Part B	108,900 Gallons	D; C; Catch Basin
SO2	Y	N	Numerous, See Part B	1,119,865 Gallons	D; C; Vault w/coating on concrete

RECEIVED
AUG 23 1996
IEPA-DLPC

HAZARDOUS WASTES

Still Bottoms - F001-F002, and D001-D00X
- Residual material from the distillation process
- Shipped to Safety-Kleen in Clarksville, MO for fuel blending or reclamation.
- Rate of generation: 30,000 - 60,000 gal/month
- Amount on site: 10,425 gallons in bulk and 2,420 gallons in drums.

Spent Solvent - D001, D006, D008, D018, D035, D040
- Waste generated from two parts washers and one immersion cleaner unit.
- Shipped to Safety-Kleen in Dolton, IL for reclamation.
- Rate of generation: 30-40 gallons quarterly
- Amount on site: 0

Hazardous Waste Solids - F001, F002 and D001-D00X
- Waste generated by various methods:
  - Cleaning out tanks
  - Used oil dry
  - Hose drippings
  - Cut drums in order to remove solid material
  - Used filters from filtering material from waste and product tanks
- Shipped to Safety-Kleen in Hebron, OH for fuel blending/ reclamation or further treatment.
- Rate of generation: 15-20 55 gallon drums/month
- Amount on site: 22/55 gallon drums

Remanifasted Waste - F001, F002, F003, D001, D002, D027
- Waste generated from manifesting errors and temporary storage.
- Shipped to WIT in East Liverpool, OH for fuel recovery.
- Rate of Generation: Last shipment 7/17/95
- Amount on-site: 0

RO Waste Flammable Liquid - F001
- Waste generated from processes utilized at the site.
- Shipped to Safety-Kleen in Smithfiels, Kentucky for fuel blending.
- Rate of generation: No longer generated, last shipment8/12/95
- Amount on-site: 0

Hazardous Liquid Waste - F001, F002

- Returned non-reclaimable waste.
- Shipped back to Safety-Kleen in Denton, TX for fuel blending.
- Rate of generation: Occasional
- Amount on-site: 0

OBSERVATIONS

Facility has completed Phase II RCRA Facility Investigation (RFI) Workplan. Facility is waiting for permit approval of Workplan.

A Class 1 Modification of the Part B permit has been submitted to Permits to incorporate a new chemical compound into the list of wastes that can be accepted on a generic basis at the facility. Specifically, the facility has received a customer wastestream into tank storage, for on-site toll recycling, that contains 18% by weight Diethoxymethane.

At the time of the inspection, this facility was regulated as a generator, treatment, storage facility and marketer of waste fuel. The facility appeared to be in compliance with all applicable RCRA regulations and their Part B Permit requirements.

Facility Name: SAFETY-KLEEN CORP CHICAGO RC

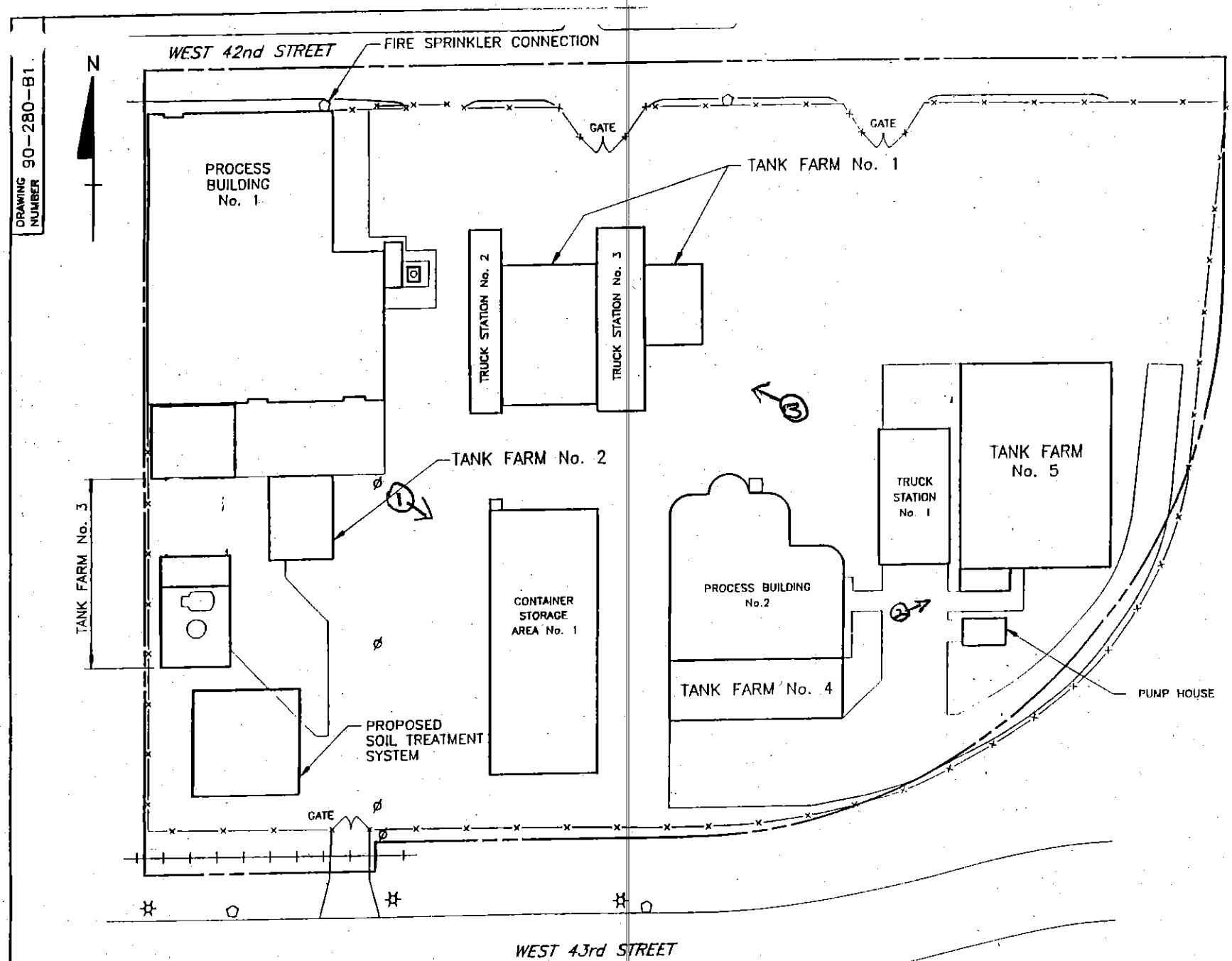
USEPA #: IL D005450697

IEPA #: 0316000053

WASTE DISPOSITION FORM

Waste Name (include haz & waste for which no determination has been made)	Generating Process (For waste gen. on site, N/A for TSD	Date of Last Analysis	USEPA Haz Waste #	*On 8700-12	*On 3510-3	On Annual Report for: (Circle if present; cross out if not present) *19 95	*19 94	*19 93	Amount on Site	Rate of Generation	Last manifested Shipment	Disposition
Still Bottoms	Residue from distillation process	Every Shipment Analyzed	F001-5 D001-X	Y	Y	G / F	G / F	G / F	10,425 gallons & 44 Drums	30,000 gal/month	7/22/96	S/K Clarksville, MO & Continental Cement Group Fuel Recovery
Spent Solvent	2 Parts Washers 1 Immersion Unit		D001 D018 D039	Y	Y	G / F	G / F	G / F	0	Approx. 30-40 gal/month	5/30/96	Safety-Kleen Dolton, IL Reclamation/RC
Haz. Solid Waste	From spills, clean-ups & processing filters		F001-5 D001-X	Y	Y	G / F	G / F	G / F	22 Drums	15-20 Drum/month	7/2/96	Safety-Kleen Hebron, OH Fuel blending
Remanifested Waste	Errors & Temp. storage		F001 F002 F003	Y	Y	G / F	G / F	G / F	0	0	7/17/95	WTI East Liverpool, OH Fuel Recovery
			D001 D002			G / F	G / F	G / F				
Returned Waste	Non-Reclaimable		F001 F002	Y	Y	G / F	G / F	G / F	0	Occasional	7/16/96	Safety-Kleen Denton, TX Fuel Blending
						G / F	G / F	G / F				
						G / F	G / F	G / F				
						G / F	G / F	G / F				

*All "NO" responses must be explained in narrative



No.	DATE	ISSUE / REVISION	DWN. BY	CK'D BY	APP'D BY
1	11-7-91	ISSUED TO CLIENT AND AGENCY	SAK		PWL

REFERENCES:
- SAFETY KLEEN CORP., ELGIN ILLINOIS, DRAWING 88-62000-00, DATED 1987 REVISION 0.

Safety-Kleen Chicago RC
0316000053
7-30-96

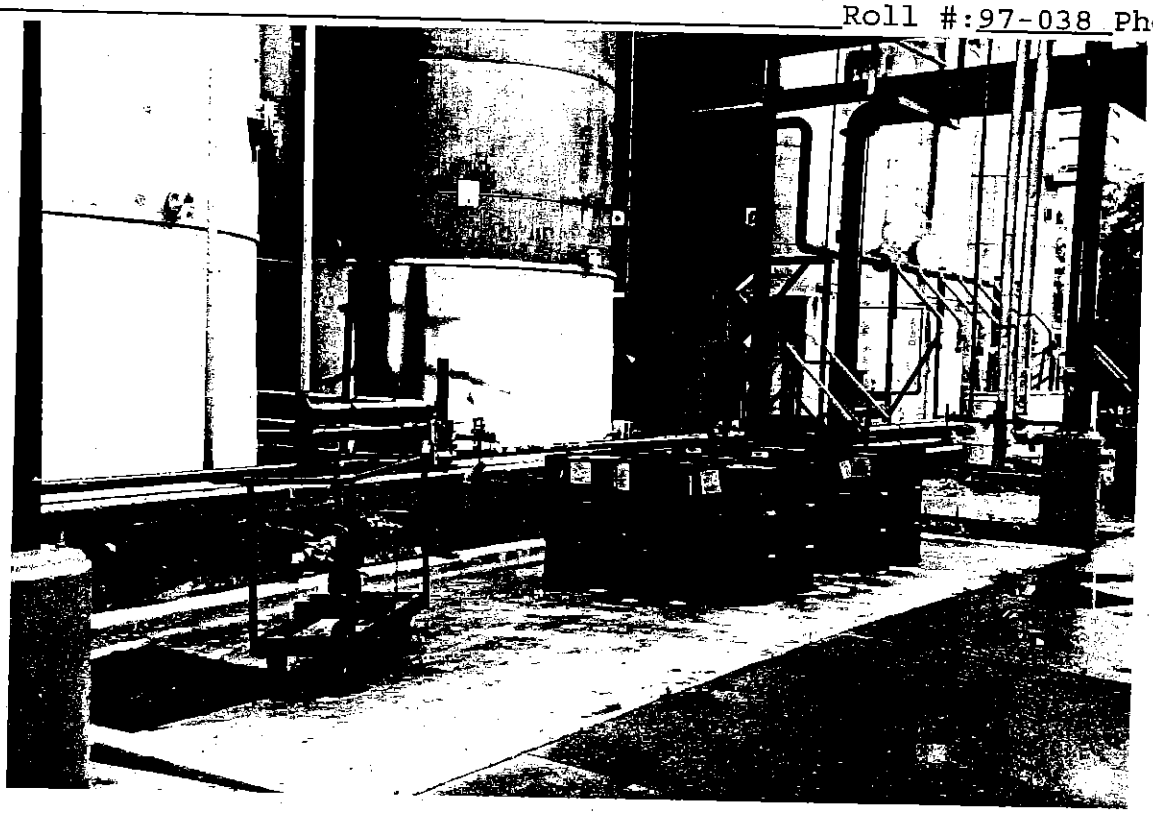
Illinois Environmental Protection Agency Photographs

Site Name: Safety-Kleen Corp. Chicago RC IEPA#: 0316000053

Date: July 30, 1996 Time: 9:00AM - 11:00AM Photograph By: Anna Van Orden

Comments: Facing southeast - Container Storage Area

Roll #: 97-038 Photo#: 1



Comments: Facing northeast - Staging Area for Tank Farm #5

Roll #: 97-038 Photo# 2

Illinois Environmental Protection Agency Photographs

Site Name: Safety-Kleen Corp. Chicago RC IEPA#: 0316000053

Date: July 30, 1996 Time: 9:00AM - 11:00AM Photograph By: Anna Van Orden

Comments: Facing northwest - Tank Farm #1

Roll #: 97-038 Photo#: 3

Comments:

Roll #: Photo#

RCRA Part B Inspection Site # 0316000053

Section I: Containers

	Compliance	
A. Hazardous Waste Management Units	(YES)	NO
B. Waste Identification	(YES)	NO
C. Condition of Containers	(YES)	NO
D. Compatibility of Containers	(YES)	NO
E. Management of Containers	(YES)	NO
F. Inspections	(YES)	NO
G. Containment	(YES)	NO
H. Ignitable or Reactive Wastes	(YES)	NO
I. Special Requirements for Incompatible Wastes	(YES)	NO
J. General Operating Requirements	(YES)	NO
K. Closure Requirements	(YES)	NO

Description of violation: _____

Section II: Tank Systems

	Compliance	
B. Waste Identification	(YES)	NO
C. Containment and Detection of Releases	(YES)	NO
D. General Construction Requirements	(YES)	NO
E. General Operating Requirements	(YES)	NO
F. Tank System Certification	(YES)	NO
G. Response to Leaks or Spills	(YES)	NO

Section IV: Corrective Action

	Compliance	
E. Financial Assurance for Corrective Action	(YES)	NO
F. Notification Requirements for and Assessment of Newly-Identified Solid Waste Management Unit(s)	(YES)	NO
G. Future Releases from SWMUs	(YES)	NO
H. Completion of Corrective Action	(YES)	NO

Description of violations: _____

Section V: Standard Conditions

	Compliance	
A. General Requirements	(YES)	NO
B. General Facility Standards	(YES)	NO
C. Preparedness and Prevention	(YES)	NO
D. Contingency Plan	(YES)	NO
E. Manifest System, Recordkeeping and Reporting	(YES)	NO
F. Closure	(YES)	NO
G. Land Disposal Restrictions	(YES)	NO

Description of violations: _____

SAFETY-KLEEN 0316000053

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
	Part 722: Standards Applicable to Generators of Hazardous Waste (>1000 Kg/mo.)	
	Subpart A: General	
	Section 722.111: Hazardous Waste Determination	
722.111	Has the generator correctly determined if the solid waste(s) it generates is a hazardous waste? Yes ✓ No____ N/A____	722.111
	Have hazardous wastes been identified for purposes of compliance with Part 728? Yes ✓ No____ N/A____	
808.121(a)	Has the generator correctly determined if the solid waste(s) it generates is a special waste? Yes ✓ No____ N/A____	808.121(a)
	Section 722.112: USEPA Identification Numbers	
722.112(a)	Has the generator obtained a USEPA identification number? Yes ✓ No____ N/A____	722.112(a)
722.112(c)	Has the generator offered its hazardous waste only to transporters or to treatment, storage or disposal facilities that have a USEPA identification number? Yes ✓ No____ N/A____	722.112(c)
	Subpart B: The Manifest	
	Section 722.120: General Requirements	
722.120(a)	Does the facility manifest its waste off–site? Yes ✓ No____ N/A____	722.120(a)
722.120(b)	Does the manifest designate a facility permitted to handle the waste? Yes ✓ No____ N/A____	722.120(b)
722.120(d)	Has the generator shipped any waste that could not be delivered to the designated facility? Yes____ No ✓ N/A____	722.120(d)
	Section 722.121: Acquisition of Manifests	
	Has the generator used:	
722.121(a)	–an Illinois manifest for wastes designated to a facility within Illinois? Yes ✓ No____ N/A____	722.121(a)
722.121(b)	– a manifest from the State to which the manifest is designated? Yes ✓ No____ N/A____	722.121(b)
	– an Illinois manifest if the State to which the waste is designated has no manifest of its own? Yes____ No____ N/A ✓	
	Section 722.122: Number of Copies	
722.122	Does the manifest consist of at least 6 copies? Yes ✓ No____ N/A____	722.122
	Section 722.123: Use of the Manifest	
	For each manifest reviewed, has the generator:	
722.123(a)	– signed the certificate by hand? Yes ✓ No____ N/A____	722.123(a)
	– obtained the handwritten signature and the date of acceptance by the initial transporter? Yes ✓ No____ N/A____	
	– retained one copy as required by Section 722.140(a)? Yes ✓ No____ N/A____	
	– apparently sent a copy (part 5 for the Illinois manifest) to the Agency within 2 working days? Yes ✓ No____ N/A____	
722.123(b)	– has the generator apparently given the remaining copies to the transporter? Yes ✓ No____ N/A____	722.123(b)

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
	Subpart I: Use and Management of Containers	
	Has the generator closed an accumulation area? Yes____ No____ N/A ✓	
(725.211) (725.214)	If "Yes", was the accumulation area closed in accordance with Sections 725.211 and 725.214? Yes____ No____ N/A ✓	
(725.271)	If the containers have leaked or are in poor condition, has the owner/operator transferred the hazardous waste to a suitable container? Yes____ No____ N/A ✓	
(725.272)	Is the waste compatible with the container and/or liner? Yes ✓ No____ N/A____	
(725.273a)	Are containers of hazardous waste always closed except to remove or add waste during accumulation? Yes ✓ No____ N/A____	
(725.273b)	Are containers of hazardous waste being opened, handled, or stored in a manner which will prevent the rupture of the container or prevent it from leaking? Yes ✓ No____ N/A____	
(725.274)	Is the owner/operator inspecting the accumulation area(s) at least weekly, looking for leaks or deterioration? Yes ✓ No____ N/A____	
	Is the accumulation area free from any evidence of leaking or deteriorating containers? (See also Section 725.131) Yes ✓ No____ N/A____	
(725.276)	Are containers holding ignitable or reactive wastes located at least 15 meters (50 feet) from the facility's property line? Yes ✓ No____ N/A____	
	Note: See Section 725.117(a) for additional requirements for ignitable, reactive or incompatible wastes.	
(725.277)	Is the owner/operator complying with the requirements concerning incompatible wastes? Yes ✓ No____ N/A____	
	Comments:	
	Does the generator accumulate and/or treat hazardous waste in **tanks?** Yes ✓ No____ N/A____	
	Note: If "No", go to Subpart C.	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)				Violation
(725.152a)	Does the plan describe the actions required for response to:				
	– fires?	Yes ✓	No____	N/A____	
	– explosions?	Yes ✓	No____	N/A____	
	– releases?	Yes ✓	No____	N/A____	
(725.152c)	Does the plan describe arrangements with:				
	– police and fire departments?	Yes ✓	No____	N/A____	
	– hospitals?	Yes ✓	No____	N/A____	
	– contractors?	Yes ✓	No____	N/A____	
	– emergency response teams?	Yes ✓	No____	N/A____	
(725.152d)	Does the plan contain the current emergency coordinator's name, phone (office and home) and address?	Yes ✓	No____	N/A____	
(725.152e)	Does the plan identify all emergency equipment including:				
	– description?	Yes ✓	No____	N/A____	
	– capability?	Yes ✓	No____	N/A____	
	– location?	Yes ✓	No____	N/A____	
	Is the list of emergency equipment up–to–date?	Yes ✓	No____	N/A____	
(725.152f)	Does the plan include:				
	– an evacuation plan?	Yes ✓	No____	N/A____	
	– an evacuation signal?	Yes ✓	No____	N/A____	
	– alternate evacuation routes?	Yes ✓	No____	N/A____	
(725.153)	Has the contingency plan (including all revisions) been:				
	a) maintained at the facility?	Yes ✓	No____	N/A____	
	b) submitted to:				
	– police department?	Yes ✓	No____	N/A____	
	– fire department?	Yes ✓	No____	N/A____	
	– hospital?	Yes ✓	No____	N/A____	
	– emergency response teams?	Yes ✓	No____	N/A____	
(725.154)	Has the contingency plan been reviewed and revised whenever:				
	a) regulations are revised?	Yes ✓	No____	N/A____	
	b) the plan fails in an emergency?	Yes____	No____	N/A ✓	
	c) the facility changes in a way that modifies the emergency response necessary?	Yes ✓	No____	N/A____	
	d) information regarding emergency coordinators changes?	Yes ✓	No____	N/A____	
	e) information regarding equipment changes?	Yes ✓	No____	N/A____	
(725.155)	Is the emergency coordinator on–site or on call at all times?	Yes ✓	No____	N/A____	
	Is the emergency coordinator familiar with all facility activities, wastes, records, layout and contingency plan?	Yes ✓	No____	N/A____	
	Does the emergency coordinator have the authority to commit the resources needed to carry out the actions specified in the contingency plan?	Yes ✓	No____	N/A____	
(725.156)	If the facility has had a release, fire or explosion, have the procedures of this Section been followed regarding assessment, response and reporting?	Yes____	No____	N/A ✓	
	Note: If the facility has had a release, explain in detail.				

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
	Section 728.107: Waste Analysis and Recordkeeping	
728.107a4)	Has the generator who treats a prohibited waste in tanks or containers in order to meet the treatment standards developed and followed a waste analysis plan? Yes ✓ No____ N/A____	
	Is the plan on–site? Yes ✓ No____ N/A____	
	Does the plan include a detailed physical and chemical analysis? Yes ✓ No____ N/A____	
	Has the plan been filed with the Agency at least 30 days prior to commencement of treatment activity? Yes ✓ No____ N/A____	
	Has the generator submitted the required notification and certification that the waste meets treatment standards when the waste is shipped off–site? Yes ✓ No____ N/A____	
	Subsection 722.134(c): Satellite Accumulation	
722.134(c)	Is the generator who accumulates hazardous waste at or near any point of generation where wastes initially accumulate and which is under the control of the operator of the process generating the waste limiting such accumulation to 55 gallons of hazardous waste or 1 quart of **acutely** hazardous waste marking the containers with the words "Hazardous Waste" or other words identifying the contents? Yes ✓ No____ N/A____	722.134(c)
	Has the generator who accumulates more than 55 gallons of hazardous waste or 1 quart of **acutely** hazardous waste complied with the requirements of Section 722.134(a) within 3 working days? Yes____ No____ N/A ✓	
	If there are more than 55 gallons of hazardous waste or 1 quart of **acutely** hazardous waste in the satellite accumulation area, are the containers marked with the date accumulation began? Yes____ No____ N/A ✓	
	During the 3 day period, is the generator continuing to comply with the requirements of Section 722.134(c)(1) with respect to the excess waste? Yes____ No____ N/A ✓	
	Subpart D: Recordkeeping and Reporting	
	Section 722.140: Recordkeeping	
722.140(a)	Has the generator retained for a period of 3 years: – a copy of each signed manifest? Yes ✓ No____ N/A____	722.140(a)
722.140(b)	Has the generator retained a copy of each Annual Report and Exception Report for a period of at least three years from the due date of the report (March 1)? Yes ✓ No____ N/A____	722.140(b)
722.140(c)	Has the generator retained for a period of 3 years: – copies of test results, waste analyses or other determinations made in accordance with Section 722.111? Yes ✓ No____ N/A____	722.140(c)
722.140(d)	Does a generator who is involved in any unresolved enforcement action or as requested by the Director continue to maintain the records required in subsections a) and c)? Yes____ No____ N/A ✓	722.140(d)
	Section: 722.141: Annual Reporting	
722.141(a)	Has the generator who ships hazardous waste off–site for treatment, storage or disposal filed an annual report with the Agency by March 1 for the preceding calendar year? Yes ✓ No____ N/A____	722.141(a)
	Note: If "No", or if deficiencies are noted with the annual report reviewed, contact the Planning and Reporting Section.	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
	4) design or operational measures that will protect underground tank systems from potential damage resulting from vehicular traffic? Yes____ No____ N/A✓	
	5) designs to ensure adequate foundations, anchoring to prevent flotation or dislodgement and the ability to withstand the effects of frost heave? Yes____ No____ N/A✓	
(725.292g)	Has the owner/operator obtained and kept on file at the facility the written statements, including the certification statements [as required in Section 702.126(d)] of the design and installation requirements of Subsections (b) through (f)? Yes✓ No____ N/A____	
(725.293a)	Is **secondary containment** provided for any new tank system before being put into service? Yes✓ No____ N/A____	
	Does an existing tank, used to accumulate F020, F021, F022, F023, F026 or F027 waste(s), have secondary containment by 1/12/89? Yes____ No____ N/A✓	
	For an existing tank of documentable age, is secondary containment provided by 1/12/89 or when the tank is 15 years old, whichever is later? Yes✓ No____ N/A____	
	For an existing tank of undocumentable age, has secondary containment been provided by 1/12/95? Yes✓ No____ N/A____	
	or if the **facility** is older than 7 years, by the time the **facility** reaches 15 years of age or 1/12/89, whichever is later? Yes✓ No____ N/A____	
	For tanks that accumulate wastes that become hazardous after 1/12/87, has secondary containment been provided within the time intervals required in Subsections (a)(1) through (a)(4) substituting the date that a material becomes a hazardous waste for 1/12/87? Yes✓ No____ N/A____	
(725.293b)	Is the secondary containment system designed, installed and operated to prevent migration of wastes or accumulated liquid out of the system at any time? Yes✓ No____ N/A____	
	Is the secondary containment system capable of detecting and collecting releases and accumulated liquids until the collected material is removed? Yes✓ No____ N/A____	
(725.293c)	To meet the requirements of Subsection (b), is the secondary containment system: 1) compatible with the waste(s) in the tank and of sufficient strength and thickness to prevent failure? Yes✓ No____ N/A____	
	2) placed on a foundation or base capable of providing support, providing resistance to pressure gradients and preventing failure due to settlement, compression of uplift? Yes✓ No____ N/A____	
	3) provided with a leak detection system designed and operated to detect any release or accumulated liquid within 24 hours? Yes✓ No____ N/A____	
	4) sloped or otherwise designed or operated to drain and remove liquids resulting from leaks, spills or precipitation? Yes✓ No____ N/A____ and is spilled or leaked waste and accumulated precipitation removed from the secondary containment within 24 hours? Yes✓ No____ N/A____	
	Note: A RCRA permit may allow for removal of liquids less frequently than 24 hours after accumulation.	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.293d)	Does the secondary containment for tanks have one or more of the following: 1) a liner (external to the tank); or 2) a vault; or 3) a double–walled tank; or 4) an equivalent device (approved by the Board)? Yes ✓ No____ N/A____	
(725.293e)	Does the external liner system(s), vault system(s) and/or double–walled tank(s) meet the additional requirements identified in Section 725.293(e)? Yes ✓ No____ N/A____	
(725.293f)	Is ancillary equipment protected by secondary containment that meets the requirement of Subsection (h) and (c)? Yes ✓ No____ N/A____ If "No": 1) Is aboveground piping (exclusive of flanges, joints, valves and connections) inspected daily? Yes ✓ No____ N/A____ 2) Are welded flanges, joints and connections inspected daily? Yes ✓ No____ N/A____ 3) Are sealless or magnetic coupling pumps and sealless valves inspected daily? Yes ✓ No____ N/A____ 4) Are pressurized aboveground piping systems with automatic shut–off devices inspected daily? Yes ✓ No____ N/A____	
(725.293i)	Until such time as secondary containment is provided, are the following requirements being met for all tank systems: 1) For non–enterable underground tanks, has an annual leak test that meets the requirements of 725.291(b)(5) been conducted? Yes____ No____ N/A ✓ 2) For other than non–enterable underground tanks and ancillary equipment, has an annual leak test, internal inspection or other tank integrity examination by an IRPE been conducted? Yes____ No____ N/A ✓ 3) Are written records maintained at the facility to document the assessments required under Subsections (i)(1) and (i)(2)? Yes____ No____ N/A ✓ **Note:** If a tank system is found to be leaking or unfit for use as a result of a leak test or assessment, the owner/operator must comply with Section 725.296.	
(725.294a)	Has the owner/operator placed hazardous wastes or treatment reagents in the tank system that could cause the system to rupture, leak, corrode or otherwise fail? Yes____ No ✓ N/A____	
(725.294b)	Do tanks and secondary containment have appropriate controls and practices to prevent spills and overflows including: 1) spill prevention controls? Yes ✓ No____ N/A____ 2) overfill prevention controls? Yes ✓ No____ N/A____ 3) sufficient freeboard in uncovered tanks? Yes____ No____ N/A ✓	
(725.294c)	**Note:** If a leak or spill has occurred in the tank system, the owner/operator shall comply with the requirements of Section 725.296.	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
	Note: If the owner/operator does not satisfy the requirements of subsections (e)(2) through (e)(4), the tank system must be closed in accordance with Section 725.297.	
(725.297a)	At the time of closure of a tank system, has the owner/operator removed or decontaminated all waste residues, contaminated components, contaminated soils and structures and equipment and managed them as hazardous waste [unless Section 721.103(d) applies]? Yes____ No____ N/A✓	
(725.297a)	Have the closure plan, closure activities, cost estimates for closure and financial responsibility for tank systems met all requirements specified in Subparts G and H? Yes✓ No____ N/A____	
(725.297b)	If the tank system cannot be "clean" closed, has the owner/operator closed the tank system and performed post–closure care in accordance with the closure and post–closure care requirements that apply to landfills (Section 725.410)? Yes____ No____ N/A✓	
	Note: Such a tank system is considered a landfill and must meet all of the requirements of landfills specified in Subparts G and H.	
(725.298a)	Are ignitable or reactive wastes placed in a tank system? Yes✓ No____ N/A____	
	If "No", skip to Section 725.299.	
	Is the waste treated, rendered or mixed before or immediately after placement in the tank system so that: – the resulting waste, mixture or dissolved material is no longer ignitable or reactive? Yes____ No____ N/A✓ – Section 725.117(b) is complied with? Yes✓ No____ N/A____	
	or Is the waste accumulated or treated so that it is protected from any material or conditions which may lead to ignition or reaction? Yes✓ No____ N/A____	
	or Is the tank used solely for emergencies? Yes____ No____ N/A✓	
(725.298b)	Is the facility complying with the requirements regarding maintenance of protective distances between the waste management area and any public ways, streets, alleys or any adjoining property line? Yes✓ No____ N/A____	
(725.299)	Are incompatible wastes/materials placed in the same tank? Yes____ No✓ N/A____	
	If "No", skip to Section 725.300.	
	Is Section 725.117(b) being complied with? Yes____ No____ N/A✓	
	Has the tank system been properly decontaminated if it previously held an incompatible waste/material unless Section 725.117(b) is complied with? Yes____ No____ N/A✓	
	COMMENTS:	

Regulation	RCRA LDR INSPECTION CHECKLIST (PART 728)	Violation
	Part 728: Land Disposal Restrictions	
	Subpart A: General	
	Section 728.103: Dilution Prohibited as a Substitute for Treatment	
728.103(a)	Has a person diluted a restricted waste or a treatment residual of a restricted waste as a substitute for adequate treatment? Yes____ No____ N/A ✓	728.103(a)
	Note: Has any person filed for a petition to allow land disposal of wastes prohibited under Subpart C of Part 728? Yes____ No____ N/A ✓	
	Section 728.104: Treatment Surface Impoundment Exemption	
728.104	Are wastes that are otherwise prohibited from land disposal under this Part being treated in a surface impoundment that meets the requirements of this Section? Yes____ No____ N/A ✓	728.104
	Section 728.107: Waste Analysis and Recordkeeping	
728.107(a)	Has the generator tested the waste [as specified in 728.107(a)] or used knowledge of the waste to determine if the waste is restricted from land disposal? Yes ✓ No____ N/A____	728.107(a)
728.107(a)(1)	If a generator determines that its waste is restricted, has a notice been sent with each shipment that includes the following information:	728.107(a)(1)
	A) USEPA Hazardous Waste Number? Yes ✓ No____ N/A____	
	B) corresponding treatment standards or a reference to the treatment standard by section or applicable treatment code? Yes ✓ No____ N/A____	
	C) manifest number associated with the shipment of waste? Yes ✓ No____ N/A____	
	D) for hazardous debris, the contaminants subject to treatment as provided by Section 728.145(b) and the following statement: "This hazardous debris is subject to the alternative treatment standards of Section 728.145?" Yes____ No____ N/A ✓	
	E) waste analysis data, where available? Yes ✓ No____ N/A____	
728.107(a)(2)	Has the generator of a restricted waste that meets the applicable treatment standards submitted, with each shipment, a notice and certification, as specified in this Section, stating that the waste meets applicable treatment standards and can be land disposed without further treatment? Yes____ No____ N/A ✓	728.107(a)(2)
728.107(a)(3)	Has the generator of a restricted waste that has been exempted under Section 728.106 submitted a notice, as specified in this section, with each shipment to the receiving facility, stating that the waste is not prohibited from land disposal? Yes____ No____ N/A ✓	728.107(a)(3)
728.107(a)(4)	Has the generator who treats a prohibited waste in tanks or containers in order to meet the treatment standards developed and followed a waste analysis plan? Yes ✓ No____ N/A____	728.107(a)(4)
	Is the plan on-site? Yes ✓ No____ N/A____	
	Does the plan include a detailed physical and chemical analysis? Yes ✓ No____ N/A____	
	Has the plan been filed with the Agency at least 30 days prior to commencement of the treatment activity? Yes ✓ No____ N/A____	

Regulation	RCRA LDR INSPECTION CHECKLIST (PART 728)	Violation
728.107(b)(7)	Has the recycling facility that is making off-site shipments of recyclable materials used in a manner constituting disposal: – submitted to the Agency a notice and certification with each shipment in accordance with 728.107(b)(4) and (b)(5)? Yes ✓ No___ N/A___ – kept records of the name and location of each entity receiving the hazardous waste-derived product? Yes ✓ No___ N/A___	728.107(b)(7)
728.107(c)	Has the owner/operator of any land disposal facility disposing of any restricted waste, except where the waste being disposed of is a recyclable material used in a manner constituting disposal: 1) maintained copies of the notice and certification specified in subsection 728.107(a) or (b)? Yes___ No___ N/A ✓ 2) tested the waste to ensure that it is in compliance with applicable treatment standards or prohibitions? Yes___ No___ N/A ✓	728.107(c)
728.107(c)(4)	Note: If the owner/operator is disposing of any waste that is a recyclable material used in a amanner constituting disposal, the owner/operator is not subject to the subsections (c)(1) and (c)(2) with respect to such waste.	
728.107(d)	Has the generator or treater who first claims that their hazardous debris is excluded from the definition of a hazardous waste under Section 728.103(f)(2) provided the following notification and certification: 1) a one-time notification submitted to the Agency including the following information: A) the name and address of the RCRA Subtitle D facility receiving the treated debris? Yes___ No___ N/A ✓ B) a description of the hazardous debris as initially generated including the applicable USEPA hazardous waste number(s)? Yes___ No___ N/A ✓ C) for debris excluded under Section 728.103(f)(2), the technology from Section 728, Table F? Yes___ No___ N/A ✓ 2) Has the notification been updated if the debris is shipped to a different facility or if a different technology is used to treat the debris? Yes___ No___ N/A ✓ 3) For debris excluded under Section 728.103(f)(2), has the owner/operator of the treatment facility documented and certified compliance with the treatment standards of Section 728, Table F pursuant to this Subsection? Yes___ No___ N/A ✓	728.107(d)
	Section 728.109: Special Rules for Characteristic Wastes	
728.109(a)	Has the generator determined each USEPA hazardous waste code applicable to the waste in order to determine the applicable treatment standards under Subpart D? Yes ✓ No___ N/A___ Note: For purposes of this Part, the waste will carry the waste code for any applicable listing under Part 721, Subpart D and one or more of the waste codes under Part 721, Subpart C where the waste exhibits the relevant characteristic, except in the case when the treatment standard for the Subpart D waste code operates in lieu of the standard for the Subpart C waste code as specified in subsection (b).	728.109(a)
728.109(b)	Does the waste meet the treatment standards for all applicable listed and characteristic waste codes? Yes ✓ No___ N/A___ Note: Where a prohibited waste is both listed and characteristic, the treatment standard for the listed waste code will operate in lieu of the standard for the characteristic waste code, provided that the treatment standard for the listed waste includes a treatment standard for the constituent that causes the waste to exhibit the characteristic.	728.109(b)

Regulation	RCRA LDR INSPECTION CHECKLIST (PART 728)	Violation
	Section 728.133: Waste Specific Prohibitions -- First Third Wastes	
728.133	Has the generator of a first third waste land disposed the waste only after having:	
	1) met the treatability standards of Part 728, Subpart D; or Yes____ No____ N/A ✓	728.133
	2) been granted an adjusted standard pursuant to Section 728.106; or Yes____ No____ N/A ✓	
	3) been granted an extension to the effective date of prohibition pursuant to Section 728.105? Yes____ No____ N/A ✓	
728.133(g)	Has the generator of a first third waste tested the waste or used knowledge of the waste to determine whether it exceeds the applicable treatment standards? Yes____ No____ N/A ✓	728.133(g)
	Section 728.134: Waste Specific Prohibitions -- Second Third Wastes	
728.134	Has the generator of a second third waste land disposed the waste only after having:	
	1) met the treatability standards of Part 728, Subpart D; or Yes____ No____ N/A ✓	728.134
	2) been granted an extension to the effective date of prohibition pursuant to Section 728.105; or Yes____ No____ N/A ✓	
	3) been granted an exemption pursuant to Section 728.106? Yes____ No____ N/A ✓	
728.134(i)	Has the generator of a second third hazardous waste tested the waste or used his knowledge of the waste to determine whether it exceeds the applicable treatment standards of 728.141 or 728.143? Yes____ No____ N/A ✓	728.134(i)
	Section 728.135: Waste Specific Prohibitions -- Third Third Wastes	
728.135	Has the generator of a third third waste land disposed the waste only after having:	
	1) met the treatability standards of Part 728, Subpart D; or Yes____ No____ N/A ✓	728.135
	2) been granted an exemption from a prohibition pursuant to a petition under Section 728.106; or Yes____ No____ N/A ✓	
	3) met the applicable alternate standards established pursuant to a petition granted under Section 728.144; or Yes____ No____ N/A ✓	
	4) been granted an extension to the effective date of a prohibition pursuant to Section 728.105? Yes____ No____ N/A ✓	
728.135(j)	Has the generator of a third third waste listed in 728.110, 728.111 or 728.112 tested the waste or used his knowledge of the waste to determine whether it exceeds the applicable treatment standards of Sections 728.141 or 728.143? Yes ✓ No____ N/A____	728.135(j)
	Section 728.139: Statutory Prohibitions	
728.139	Has a person caused, threatened or allowed the land disposal of any waste in violation of Section 3004 of RCRA? Yes____ No____ N/A ✓	728.139
	Subpart E: Prohibitions on Storage	
	Note: Except as provided in this section, the storage of hazardous wastes restricted from land disposal under Subpart C is prohibited.	
	Section 728.150: Prohibitions on Storage of Restricted Wastes	
728.150(a)(1)	Has the generator stored restricted wastes in tanks or containers on-site solely for the accumulation of such quantities as necessary to facilitate proper recovery, treatment or disposal? Yes ✓ No____ N/A____	728.150(a)(1)
	Has the generator complied with the requirements of Section 722.134? Yes ✓ No____ N/A____	

Illinois Environmental Protection Agency
Division of Land Pollution Control

RCRA INSPECTION REPORT

USEPA #: IL D005450697		IEPA #: 0316000053	
Facility Name: Safety-Kleen Corporation Chicago RC		Phone #: 312/247-2828	
Street Address: 1445 West 42nd Street		County: Cook	
City: Chicago	State: IL	Zip: 60609	
Region: 2	Inspection Date: 1 / 24 / 96	From: 8:30AM	To: 10:30AM
Weather:			

TYPE OF FACILITY

Notified As: G, Trans, TSD, WAF, OSF	Regulated As: G, S, WAF
LDF? No (Yes or No) HPV? No	90-Day F/U Required?: YES ____ NO XXX

TYPE OF INSPECTION

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

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

NON-REGULATED STATUS N/A

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

PART A

Notification Date: 8 / 5 / 80 , from (initial) or (subsequent) Notification.

Initial Part A Date: 11 / 19 / 80 Amended: 9 / 24 / 90

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

PART B PERMIT APPLICATION

Part B Permit Submitted: (Y) or N 11 / 19 / 88 Final Permit Issued: 9 / 30 / 92

ENFORCEMENT N/A

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

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

ORDERS ISSUED N/A

CACO: ___ / ___ / ___ CAFO: ___ / ___ / ___ Consent Decree: ___ / ___ / ___

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

TSD FACILITY ACTIVITY SUMMARY

Activity by Process Code	On Part A?	Activity Conducted Prior to 1980?	Was Activity Ever Done?	Closed	Being done at Time of Insp.?	Exempt per 35 IAC, Sec.	On Annual Report 1993	1992	1991
S01	Yes	Yes	Yes	No	Yes	N/A	Yes	Yes	Yes
S02	Yes	Yes	Yes	No	Yes	N/A	Yes	Yes	Yes
R03	N/A	Yes	Yes	N/A	Yes	725.101(c)(b)	No	No	No

RECEIVED
FEB 12 1996
OFFICE OF RCRA
WASTE MANAGEMENT DIVISION
EPA, REGION V

RECEIVED
FEB 07 1996
IEPA-DLPC

IL 532-1834

OWNER		OPERATOR	
Name	Safety-Kleen Corporation	Name	Safety-Kleen Corp. Chicago RC
Address	1000 North Randell Road	Address	1445 W. 42nd Street
City	Elgin	City	Chicago
State	IL Zip 60123	State	IL Zip 60609
Phone #	708/697-8460	Phone #	312/247-2828

PERSON(S) INTERVIEWED	TITLE	PHONE #
Alfred Aghapour	Facility Manager	312/247-2828
Ted Zajack	Operations Manager	312/247-2828
Edward R. DeSocio	Sr. Environmental Engineer	847/468-2548

INSPECTION PARTICIPANT(S)	AGENCY/TITLE	PHONE #
Anna Van Orden	IEPA/EPS	708/338-7900
Richard Reich	IEPA/EPS	708/338-7900

PREPARED BY	AGENCY/TITLE	PHONE #
Anna Van Orden	IEPA/EPS	708/338-7900

SUMMARY OF APPARENT VIOLATIONS

Area	Class	Section

Area	Class	Section

Area	Class	Section

RECEIVED
FEB 07 1996
IEPA-DLC

Safety-Kleen Corp. Chicago RC
0316000053 ILD005450697
January 24, 1996

Narrative prepared by:
Anna Van Orden

NARRATIVE

The Safety-Kleen Chicago RC(SKCRC) is an organic chemicals reclamation and recycling facility permitted to treat and store hazardous waste under a Part B Permit.

The SKCRC accepts organic chemicals and solvent wastes from industrial and commercial facilities. Reclamation and recycling operations involve either regeneration of the spent solvent or blending and processing of the material for use as a hazardous waste fuel.

Processes utilized in the reclamation of used solvents, solvent mixtures and other solvent containing wastes include neutralization, distillation, fractionation, liquid-liquid extraction and drying.

SKCRC handles primarily two accounts:

1) The Toll Business - The toll customer (generally industrial accounts) ships waste or off-specification material to the SKCRC for treatment. The facility reclaims the material to the customer's specifications and returns the material to the generator.

2) The Recycling Business - The recycling business consists of industrial solvents which come to the SKCRC from Safety-Kleen sales network. These waste materials are recycled at the facility to Safety-Kleen corporate specifications and the processed material is sold as product on the market.

HAZARDOUS WASTE UNITS

TYPE	ACTIVE	CLOSED	WASTES	SIZE/ CAPACITY	(D)IKED;(C)ONCRETE/DIR(T)/ (G)RAVEL FLOOR;TYPE OF SECONDARY CONTAINMENT
SO1	Y	N	Numerous, See Part B	108,900 Gallons	D; C; Catch Basin
SO2	Y	N	Numerous, See Part B	1,119,865 Gallons	D; C; Vault w/coating on concrete

RECEIVED
FEB 07 1996
IEPA-DLPC

HAZARDOUS WASTES

Still Bottoms - FOO1-FOO2, and D001-D00X
- Residual material from the distillation process
- Shipped to Safety-Kleen in Clarksville, MO for fuel blending or reclamation.
- Rate of generation: 30,000 - 60,000 gal/month
- Amount on site: 14,997 gallons in bulk and 5,280 gallons in drums.

Spent Solvent - DOO1, D006, D008, D018, D035, D040
- Waste generated from two parts washers and one immersion cleaner unit.
- Shipped to Safety-Kleen in Dolton, IL for reclamation.
- Rate of generation: 30-40 gallons quarterly
- Amount on site: 0

Hazardous Waste Solids - FOO1, FOO2 and D001-D00X
- Waste generated by various methods:
  - Cleaning out tanks
  - Used oil dry
  - Hose drippings
  - Cut drums in order to remove solid material
  - Used filters from filtering material from waste and product tanks
- Shipped to Safety-Kleen in Hebron, OH for fuel blending/ reclamation or further treatment.
- Rate of generation: 15-20 55 gallon drums/month
- Amount on site: 21/55 gallon drums

Remanifested Waste - F001, F002, F003, D001, D002, D027
- Waste generated from manifesting errors and temporary storage.
- Shipped to WIT in East Liverpool, OH for fuel recovery.
- Rate of Generation: 5,000 gallons/month.
- Amount on-site: 0

RQ Waste Flammable Liquid - F001
- Waste generated from processes utilized at the site.
- Shipped to Safety-Kleen in Smithfiels, Kentucky for fuel blending.
- Rate of generation: 5,000 gallons/month.
- Amount on-site: 0

Hazardous Liquid Waste - F001, F002

- Returned non-reclaimable waste.
- Shipped back to Safety-Kleen in Denton, Tx for fuel blending.
- One time occurrence (6/55 gallon drums).
- Amount on-site: 0

OBSERVATIONS

Facility has completed 50% of the work on their Phase II RCRA Facility Investigation (RFI) Workplan.

An internal and external visual inspection was completed on nineteen hazardous waste storage tanks located in tank farms #5 (18 tanks) and #2 (1 tank).

At the time of the inspection, this facility was regulated as a generator, treatment, storage facility and marketer of waste fuel. The facility appeared to be in compliance with all applicable RCRA regulations and their Part B Permit requirements.

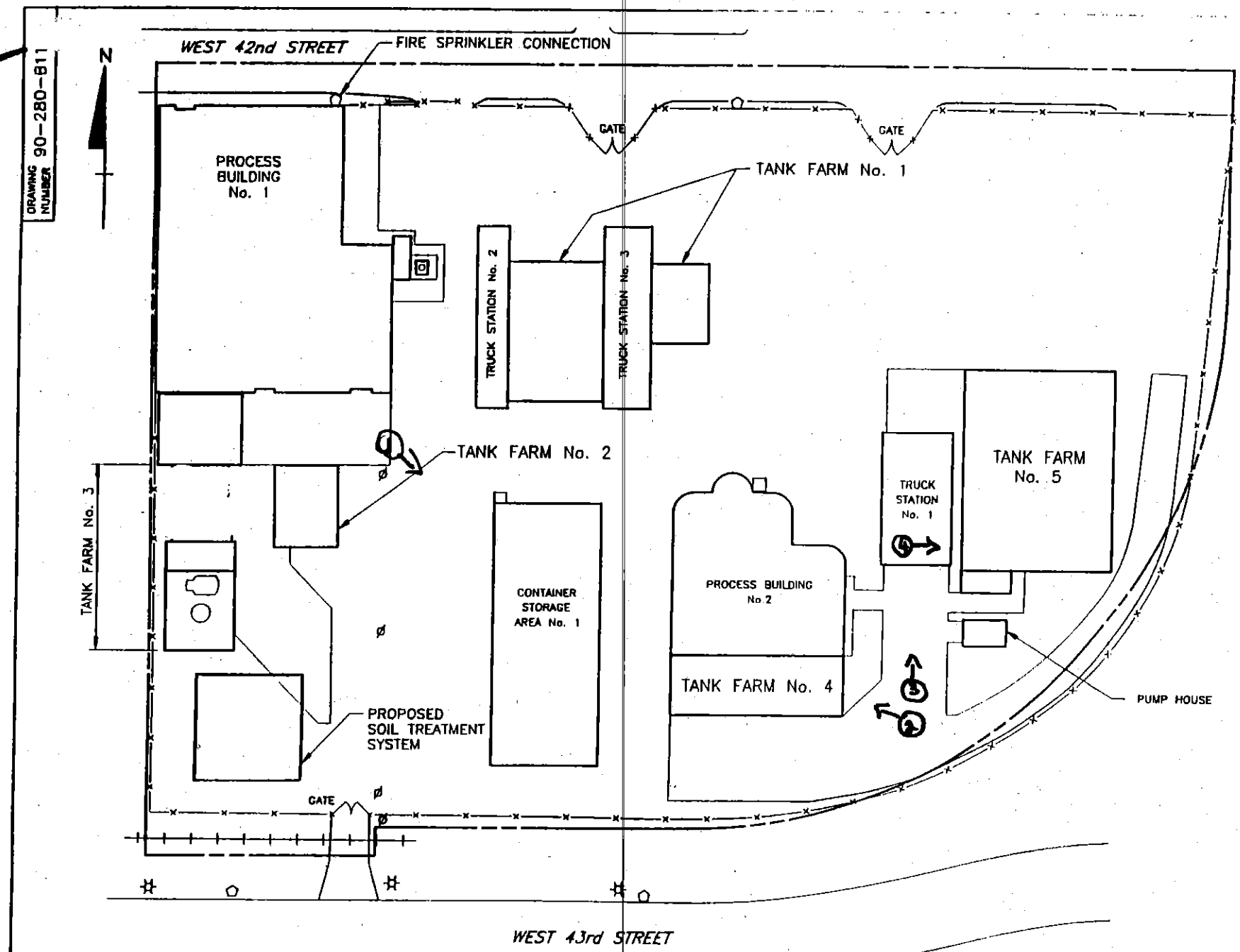
Facility Name:	Safety-Kleen Corp. Chicago RC
USEPA #: IL	D005450697
IEPA #:	0316000053

WASTE DISPOSITION FORM

RECEIVED FEB 07 1996 IEPA-DLPC

Waste Name (include haz & waste for which no determination has been made)	Generating Process (For waste gen. on site, N/A for TSD)	Date of Last Analysis	USEPA Haz Waste #	*On 8700-12	*On 3510-3	On Annual Report for: (Circle if present; cross out if not present) *19 94	*19 93	*19 92	Amount on Site	Rate of Generation	Last manifested Shipment	Disposition
Still Bottoms	Residue from distillation process	Every Shipment	F001-5 D001-X	Y	Y	G F	G F	G F	14,997 Bulk &	30,000-60,000 gal/month	1/16/96	Safety-Kleen Clarksville, MO
		Analyzed				G F	G F	G F	4,850 Drums			Fuel Recovery
Spent Solvent	2 Parts Washers 1 Immersion Unit		D001 D018 D039	Y	Y	G F	G F	G F	0	Approx. 30-40 gal	11/27/95	Safety-Kleen Dolton, IL
						G F	G F	G F		quarterly		Reclamation/ Recycling
Haz. Solid Waste	From spills, cleanings & processing Filters		F001-5 D001-X	Y	Y	G F	G F	G F	21 Drums	15-20 Drums/ month	1/15/96	Safety-Kleen Hebron, OH Fuel blending
Remanifested	Errors & Temp. Storage		F001 F002 F003	Y	Y	G F	G F	G F	0	5,000 gal month	7/17/95	WIT East Liverpool, OH
Waste			D001 D002 D027			G F	G F	G F				Fuel Recovery
RQ Waste Flam. Liquid	Process Water	↓	F001	Y	Y	G F	G F	G F	0	5,000 gal month	8/12/95	Safety-Kleen Smithfield, Kentucky Fuel blending
Returned Waste	Non-reclaimable		F001 F002	Y	Y	G F	G F	G F	0	One time	3/2/95	Safety-Kleen Denton, TX
						G F	G F	G F				Fuel blending

*All "NO" responses must be explained in narrative



No.	DATE	ISSUE / REVISION	DWN. BY	CK'D BY	APP'D BY
1	[illegible]	ISSUED TO CLIENT AND AGENCY	SAK	[illegible]	PWL

REFERENCES:
- SAFETY KLEEN CORP., ELGIN ILLINOIS, DRAWING 88-62000-00, DATED 1987 REVISION 0

Safety-Kleen Chicago RC
0316000053
January 24, 1996

SAFETY-KLEEN 0316000053

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
	Part 722: Standards Applicable to Generators of Hazardous Waste (>1000 Kg/mo.)	
	Subpart A: General	
	Section 722.111: Hazardous Waste Determination	
722.111	Has the generator correctly determined if the solid waste(s) it generates is a hazardous waste? Yes ✓ No____ N/A____	722.111
	Have hazardous wastes been identified for purposes of compliance with Part 728? Yes ✓ No____ N/A____	
808.121(a)	Has the generator correctly determined if the solid waste(s) it generates is a special waste? Yes ✓ No____ N/A____	808.121(a)
	Section 722.112: USEPA Identification Numbers	
722.112(a)	Has the generator obtained a USEPA identification number? Yes ✓ No____ N/A____	722.112(a)
722.112(c)	Has the generator offered its hazardous waste only to transporters or to treatment, storage or disposal facilities that have a USEPA identification number? Yes ✓ No____ N/A____	722.112(c)
	Subpart B: The Manifest	
	Section 722.120: General Requirements	
722.120(a)	Does the facility manifest its waste off-site? Yes ✓ No____ N/A____	722.120(a)
722.120(b)	Does the manifest designate a facility permitted to handle the waste? Yes ✓ No____ N/A____	722.120(b)
722.120(d)	Has the generator shipped any waste that could not be delivered to the designated facility? Yes____ No ✓ N/A____	722.120(d)
	Section 722.121: Acquisition of Manifests	
	Has the generator used:	
722.121(a)	– an Illinois manifest for wastes designated to a facility within Illinois? Yes ✓ No____ N/A____	722.121(a)
722.121(b)	– a manifest from the State to which the manifest is designated? Yes ✓ No____ N/A____	722.121(b)
	– an Illinois manifest if the State to which the waste is designated has no manifest of its own? Yes____ No____ N/A ✓	
	Section 722.122: Number of Copies	
722.122	Does the manifest consist of at least 6 copies? Yes ✓ No____ N/A____	722.122
	Section 722.123: Use of the Manifest	
	For each manifest reviewed, has the generator:	
722.123(a)	– signed the certificate by hand? Yes ✓ No____ N/A____	722.123(a)
	– obtained the handwritten signature and the date of acceptance by the initial transporter? Yes ✓ No____ N/A____	
	– retained one copy as required by Section 722.140(a)? Yes ✓ No____ N/A____	
	– apparently sent a copy (part 5 for the Illinois manifest) to the Agency within 2 working days? Yes ✓ No____ N/A____	
722.123(b)	– has the generator apparently given the remaining copies to the transporter? Yes ✓ No____ N/A____	722.123(b)

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
	Subpart C: Preparedness and Prevention	
(725.131)	Is the facility being operated and maintained to minimize the possibility of a fire, explosion or any release of hazardous waste or hazardous waste constituents which could threaten human health or the environment? Yes ✓ No____ N/A____	
(725.132)	Is the facility equipped with the following, if necessary: a) an internal communication or alarm system(s)? Yes ✓ No____ N/A____ b) a telephone or other device to summon emergency assistance from local authorities? Yes ✓ No____ N/A____ c) portable fire extinguishers, fire control equipment, spill control equipment and decontamination equipment? Yes ✓ No____ N/A____ d) water at adequate volume and pressure for fire control? Yes ✓ No____ N/A____	
(725.133)	Is the facility testing and maintaining communication/alarm system(s), fire protection equipment, spill control equipment and decontamination equipment? Yes ✓ No____ N/A____	
(725.134)	a) Where hazardous waste is being handled, do all employees have immediate access to an internal alarm or other emergency communication device? Yes ✓ No____ N/A____ b) If there is ever just one employee on the premises when the facility is operating, does he/she have immediate access to a device capable of summoning external emergency assistance? Yes____ No____ N/A ✓	
(725.135)	Is the facility maintaining adequate aisle space? Yes ✓ No____ N/A____	
(725.137)	Has the facility attempted to make the following arrangements, as appropriate, for the type of facility and waste: – arrangements with local emergency authorities (i.e. police and fire departments, other emergency response agencies) to familiarize them with the layout of the facility, properties of hazardous waste handled, places where facility personnel would be working, entrances to roads inside the facility and evacuation routes? Yes ✓ No____ N/A____ – agreements designating the primary authority where more than one police or fire department might respond? Yes ✓ No____ N/A____ – agreements with State emergency response teams, contractors and equipment suppliers? Yes ✓ No____ N/A____ – arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the type of injuries or illnesses which could result from fires, explosions or releases at the facility? Yes ✓ No____ N/A____	
	Subpart D: Contingency Plan and Emergency Procedures	
(725.151a)	Is the contingency plan available? Yes ✓ No____ N/A____ If "No", skip to Section 725.155. Is the plan designed to protect human health and the environment from releases to the air, soil and water? Yes ✓ No____ N/A____	
(725.151b)	Has there been a fire, explosion or release of hazardous waste? Yes____ No____ N/A ✓ If "Yes", has the contingency plan been carried out immediately? Yes____ No____ N/A ✓	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.152a)	Does the plan describe the actions required for response to:	
	– fires? Yes ✓ No____ N/A____	
	– explosions? Yes ✓ No____ N/A____	
	– releases? Yes ✓ No____ N/A____	
(725.152c)	Does the plan describe arrangements with:	
	– police and fire departments? Yes ✓ No____ N/A____	
	– hospitals? Yes ✓ No____ N/A____	
	– contractors? Yes ✓ No____ N/A____	
	– emergency response teams? Yes ✓ No____ N/A____	
(725.152d)	Does the plan contain the current emergency coordinator's name, phone (office and home) and address? Yes ✓ No____ N/A____	
(725.152e)	Does the plan identify all emergency equipment including:	
	– description? Yes ✓ No____ N/A____	
	– capability? Yes ✓ No____ N/A____	
	– location? Yes ✓ No____ N/A____	
	Is the list of emergency equipment up–to–date? Yes ✓ No____ N/A____	
(725.152f)	Does the plan include:	
	– an evacuation plan? Yes ✓ No____ N/A____	
	– an evacuation signal? Yes ✓ No____ N/A____	
	– alternate evacuation routes? Yes ✓ No____ N/A____	
(725.153)	Has the contingency plan (including all revisions) been:	
	a) maintained at the facility? Yes ✓ No____ N/A____	
	b) submitted to:	
	– police department? Yes ✓ No____ N/A____	
	– fire department? Yes ✓ No____ N/A____	
	– hospital? Yes ✓ No____ N/A____	
	– emergency response teams? Yes ✓ No____ N/A____	
(725.154)	Has the contingency plan been reviewed and revised whenever:	
	a) regulations are revised? Yes ✓ No____ N/A____	
	b) the plan fails in an emergency? Yes____ No____ N/A ✓	
	c) the facility changes in a way that modifies the emergency response necessary? Yes ✓ No____ N/A____	
	d) information regarding emergency coordinators changes? Yes ✓ No____ N/A____	
	e) information regarding equipment changes? Yes ✓ No____ N/A____	
(725.155)	Is the emergency coordinator on–site or on call at all times? Yes ✓ No____ N/A____	
	Is the emergency coordinator familiar with all facility activities, wastes, records, layout and contingency plan? Yes ✓ No____ N/A____	
	Does the emergency coordinator have the authority to commit the resources needed to carry out the actions specified in the contingency plan? Yes ✓ No____ N/A____	
(725.156)	If the facility has had a release, fire or explosion, have the procedures of this Section been followed regarding assessment, response and reporting? Yes____ No____ N/A ✓	
	Note: If the facility has had a release, explain in detail.	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
	Section 728.107: Waste Analysis and Recordkeeping	
(728.107a4)	Has the generator who treats a prohibited waste in tanks or containers in order to meet the treatment standards developed and followed a waste analysis plan? Yes ✓ No____ N/A____	
	Is the plan on–site? Yes ✓ No____ N/A____	
	Does the plan include a detailed physical and chemical analysis? Yes ✓ No____ N/A____	
	Has the plan been filed with the Agency at least 30 days prior to commencement of treatment activity? Yes ✓ No____ N/A____	
	Has the generator submitted the required notification and certification that the waste meets treatment standards when the waste is shipped off–site? Yes ✓ No____ N/A____	
	Subsection 722.134(c): Satellite Accumulation	
722.134(c)	Is the generator who accumulates hazardous waste at or near any point of generation where wastes initially accumulate and which is under the control of the operator of the process generating the waste limiting such accumulation to 55 gallons of hazardous waste or 1 quart of **acutely** hazardous waste marking the containers with the words "Hazardous Waste" or other words identifying the contents? Yes ✓ No____ N/A____	722.134(c)
	Has the generator who accumulates more than 55 gallons of hazardous waste or 1 quart of **acutely** hazardous waste complied with the requirements of Section 722.134(a) within 3 working days? Yes____ No____ N/A ✓	
	If there are more than 55 gallons of hazardous waste or 1 quart of **acutely** hazardous waste in the satellite accumulation area, are the containers marked with the date accumulation began? Yes____ No____ N/A ✓	
	During the 3 day period, is the generator continuing to comply with the requirements of Section 722.134(c)(1) with respect to the excess waste? Yes____ No____ N/A ✓	
	Subpart D: Recordkeeping and Reporting	
	Section 722.140: Recordkeeping	
722.140(a)	Has the generator retained for a period of 3 years: – a copy of each signed manifest? Yes ✓ No____ N/A____	722.140(a)
722.140(b)	Has the generator retained a copy of each Annual Report and Exception Report for a period of at least three years from the due date of the report (March 1)? Yes ✓ No____ N/A____	722.140(b)
722.140(c)	Has the generator retained for a period of 3 years: – copies of test results, waste analyses or other determinations made in accordance with Section 722.111? Yes ✓ No____ N/A____	722.140(c)
722.140(d)	Does a generator who is involved in any unresolved enforcement action or as requested by the Director continue to maintain the records required in subsections a) and c)? Yes____ No____ N/A ✓	722.140(d)
	Section: 722.141: Annual Reporting	
722.141(a)	Has the generator who ships hazardous waste off–site for treatment, storage or disposal filed an annual report with the Agency by March 1 for the preceding calendar year? Yes ✓ No____ N/A____	722.141(a)
	Note: If "No", or if deficiencies are noted with the annual report reviewed, contact the Planning and Reporting Section.	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
	Subpart J: Tank Systems	
	Has the generator closed an accumulation area? Yes____ No____ N/A✓	
(725.211) (725.214)	If "Yes", was the accumulation area closed in accordance with Sections 725.211 and 725.214? Yes____ No____ N/A✓	
(725.290)	Does the facility accumulate or treat hazardous waste in tanks? Yes✓ No____ N/A____	
	Note: A generator may treat hazardous waste in a tank for less than 90 days without a RCRA permit.	
	If "No", skip Subpart J.	
	a) Tank systems that are used to accumulate or treat hazardous waste which contains no free liquids (using the Paint Filter Liquids Test) and that are situated inside a building with an impermeable floor are exempted from the requirements in Section 725.293. b) Tank systems, including sumps, that serve as part of a secondary containment sytem to collect or contain releases of hazardous wastes are exempted from the requirements in Section 725.293(a). c) Tanks, sumps and other collection devices used in conjunction with drip pads (as defined in Section 720.110) and regulated under Subpart W, must meet the requirements of this Subpart.	
(725.291a)	For tanks <u>existing</u> prior to July 14, 1986 (see definition of tank system under 720.110)and not protected by a secondary containment system, has a written assessment been reviewed and certified by an IRPE(*) in accordance with Section 702.126(d) by January 12, 1988 [except as provided in Section 725.291(c)]? Yes____ No____ N/A✓	
(725.291b)	Does this assessment consider at least the following: 1) design standards for the tank and ancillary equipment? Yes____ No____ N/A✓	
	2) hazardous characteristics of the wastes? Yes____ No____ N/A✓ 3) existing corrosion protection measures? Yes____ No____ N/A✓ 4) documented age of the tank system? Yes____ No____ N/A✓ 5) results of a leak test, internal inspection, or other tank integrity examination? Yes____ No____ N/A✓	
(725.291c)	Has a tank system assessment been performed within 12 months after the materials in the tank become a hazardous waste? Yes✓ No____ N/A____	
	Note: If an assessment indicates a tank system is leaking or unfit for use, the owner/operator must comply with the requirements of Section 725.291(b)(5).	
(725.292a)	For <u>new</u> tanks (see definition of new tanks under Section 720.110) whose installation commenced after 7/14/86, has a written assessment been reviewed and certified by an IRPE in accordance with Section 702.126(d) prior to operation of the tank system? Yes✓ No____ N/A____	
	Does the assessment include, at a minimum, the following: 1) design standards for tanks and ancillary equipment? Yes✓ No____ N/A____ 2) hazardous characteristics of the waste(s) to be handled? Yes✓ No____ N/A____ 3) evaluation of potential for corrosion and corrosion protection measures for tank systems with metal components in contact with soil or water? Yes✓ No____ N/A____	
	*IRPE = Independent Registered Professional Engineer	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.293d)	Does the secondary containment for tanks have one or more of the following: 1) a liner (external to the tank); or 2) a vault; or 3) a double–walled tank; or 4) an equivalent device (approved by the Board)? Yes ✓ No____ N/A____	
(725.293e)	Does the external liner system(s), vault system(s) and/or double–walled tank(s) meet the additional requirements identified in Section 725.293(e)? Yes ✓ No____ N/A____	
(725.293f)	Is ancillary equipment protected by secondary containment that meets the requirement of Subsection (h) and (c)? Yes ✓ No____ N/A____ If "No": 1) Is aboveground piping (exclusive of flanges, joints, valves and connections) inspected daily? Yes ✓ No____ N/A____ 2) Are welded flanges, joints and connections inspected daily? Yes ✓ No____ N/A____ 3) Are sealless or magnetic coupling pumps and sealless valves inspected daily? Yes ✓ No____ N/A____ 4) Are pressurized aboveground piping systems with automatic shut–off devices inspected daily? Yes ✓ No____ N/A____	
(725.293i)	Until such time as secondary containment is provided, are the following requirements being met for all tank systems: 1) For non–enterable underground tanks, has an annual leak test that meets the requirements of 725.291(b)(5) been conducted? Yes____ No____ N/A ✓ 2) For other than non–enterable underground tanks and ancillary equipment, has an annual leak test, internal inspection or other tank integrity examination by an IRPE been conducted? Yes____ No____ N/A ✓ 3) Are written records maintained at the facility to document the assessments required under Subsections (i)(1) and (i)(2)? Yes____ No____ N/A ✓ Note: If a tank system is found to be leaking or unfit for use as a result of a leak test or assessment, the owner/operator must comply with Section 725.296.	
(725.294a)	Has the owner/operator placed hazardous wastes or treatment reagents in the tank system that could cause the system to rupture, leak, corrode or otherwise fail? Yes____ No ✓ N/A____	
(725.294b)	Do tanks and secondary containment have appropriate controls and practices to prevent spills and overflows including: 1) spill prevention controls? Yes ✓ No____ N/A____ 2) overfill prevention controls? Yes ✓ No____ N/A____ 3) sufficient freeboard in uncovered tanks? Yes____ No____ N/A ✓	
(725.294c)	Note: If a leak or spill has occurred in the tank system, the owner/operator shall comply with the requirements of Section 725.296.	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
	Note: If the owner/operator does not satisfy the requirements of subsections (e)(2) through (e)(4), the tank system must be closed in accordance with Section 725.297.	
(725.297a)	At the time of closure of a tank system, has the owner/operator removed or decontaminated all waste residues, contaminated components, contaminated soils and structures and equipment and managed them as hazardous waste [unless Section 721.103(d) applies]? Yes____ No____ N/A✓	
(725.297a)	Have the closure plan, closure activities, cost estimates for closure and financial responsibility for tank systems met all requirements specified in Subparts G and H? Yes✓ No____ N/A____	
(725.297b)	If the tank system cannot be "clean" closed, has the owner/operator closed the tank system and performed post–closure care in accordance with the closure and post–closure care requirements that apply to landfills (Section 725.410)? Yes____ No____ N/A✓	
	Note: Such a tank system is considered a landfill and must meet all of the requirements of landfills specified in Subparts G and H.	
(725.298a)	Are ignitable or reactive wastes placed in a tank system? Yes✓ No____ N/A____	
	If "No", skip to Section 725.299.	
	Is the waste treated, rendered or mixed before or immediately after placement in the tank system so that:	
	– the resulting waste, mixture or dissolved material is no longer ignitable or reactive? Yes____ No____ N/A✓	
	– Section 725.117(b) is complied with? Yes✓ No____ N/A____	
	or	
	Is the waste accumulated or treated so that it is protected from any material or conditions which may lead to ignition or reaction? Yes✓ No____ N/A____	
	or	
	Is the tank used solely for emergencies? Yes____ No____ N/A✓	
(725.298b)	Is the facility complying with the requirements regarding maintenance of protective distances between the waste management area and any public ways, streets, alleys or any adjoining property line? Yes✓ No____ N/A____	
(725.299)	Are incompatible wastes/materials placed in the same tank? Yes____ No✓ N/A____	
	If "No", skip to Section 725.300.	
	Is Section 725.117(b) being complied with? Yes____ No____ N/A✓	
	Has the tank system been properly decontaminated if it previously held an incompatible waste/material unless Section 725.117(b) is complied with? Yes____ No____ N/A✓	
	COMMENTS:	

SAFETY-KLEEN 0316000053

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
	Part 722: Standards Applicable to Generators of Hazardous Waste (>1000 Kg/mo.)	
	Subpart A: General	
	Section 722.111: Hazardous Waste Determination	
722.111	Has the generator correctly determined if the solid waste(s) it generates is a hazardous waste? Yes ✓ No____ N/A____	722.111
	Have hazardous wastes been identified for purposes of compliance with Part 728? Yes ✓ No____ N/A____	
808.121(a)	Has the generator correctly determined if the solid waste(s) it generates is a special waste? Yes ✓ No____ N/A____	808.121(a)
	Section 722.112: USEPA Identification Numbers	
722.112(a)	Has the generator obtained a USEPA identification number? Yes ✓ No____ N/A____	722.112(a)
722.112(c)	Has the generator offered its hazardous waste only to transporters or to treatment, storage or disposal facilities that have a USEPA identification number? Yes ✓ No____ N/A____	722.112(c)
	Subpart B: The Manifest	
	Section 722.120: General Requirements	
722.120(a)	Does the facility manifest its waste off-site? Yes ✓ No____ N/A____	722.120(a)
722.120(b)	Does the manifest designate a facility permitted to handle the waste? Yes ✓ No____ N/A____	722.120(b)
722.120(d)	Has the generator shipped any waste that could not be delivered to the designated facility? Yes____ No ✓ N/A____	722.120(d)
	Section 722.121: Acquisition of Manifests	
	Has the generator used:	
722.121(a)	– an Illinois manifest for wastes designated to a facility within Illinois? Yes ✓ No____ N/A____	722.121(a)
722.121(b)	– a manifest from the State to which the manifest is designated? Yes ✓ No____ N/A____	722.121(b)
	– an Illinois manifest if the State to which the waste is designated has no manifest of its own? Yes____ No____ N/A ✓	
	Section 722.122: Number of Copies	
722.122	Does the manifest consist of at least 6 copies? Yes ✓ No____ N/A____	722.122
	Section 722.123: Use of the Manifest	
	For each manifest reviewed, has the generator:	
722.123(a)	– signed the certificate by hand? Yes ✓ No____ N/A____	722.123(a)
	– obtained the handwritten signature and the date of acceptance by the initial transporter? Yes ✓ No____ N/A____	
	– retained one copy as required by Section 722.140(a)? Yes ✓ No____ N/A____	
	– apparently sent a copy (part 5 for the Illinois manifest) to the Agency within 2 working days? Yes ✓ No____ N/A____	
722.123(b)	– has the generator apparently given the remaining copies to the transporter? Yes ✓ No____ N/A____	722.123(b)

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
	Subpart C: Preparedness and Prevention	
(725.131)	Is the facility being operated and maintained to minimize the possibility of a fire, explosion or any release of hazardous waste or hazardous waste constituents which could threaten human health or the environment? Yes ✓ No____ N/A____	
(725.132)	Is the facility equipped with the following, if necessary: a) an internal communication or alarm system(s)? Yes ✓ No____ N/A____ b) a telephone or other device to summon emergency assistance from local authorities? Yes ✓ No____ N/A____ c) portable fire extinguishers, fire control equipment, spill control equipment and decontamination equipment? Yes ✓ No____ N/A____ d) water at adequate volume and pressure for fire control? Yes ✓ No____ N/A____	
(725.133)	Is the facility testing and maintaining communication/alarm system(s), fire protection equipment, spill control equipment and decontamination equipment? Yes ✓ No____ N/A____	
(725.134)	a) Where hazardous waste is being handled, do all employees have immediate access to an internal alarm or other emergency communication device? Yes ✓ No____ N/A____ b) If there is ever just one employee on the premises when the facility is operating, does he/she have immediate access to a device capable of summoning external emergency assistance? Yes____ No____ N/A ✓	
(725.135)	Is the facility maintaining adequate aisle space? Yes ✓ No____ N/A____	
(725.137)	Has the facility attempted to make the following arrangements, as appropriate, for the type of facility and waste: – arrangements with local emergency authorities (i.e. police and fire departments, other emergency response agencies) to familiarize them with the layout of the facility, properties of hazardous waste handled, places where facility personnel would be working, entrances to roads inside the facility and evacuation routes? Yes ✓ No____ N/A____ – agreements designating the primary authority where more than one police or fire department might respond? Yes ✓ No____ N/A____ – agreements with State emergency response teams, contractors and equipment suppliers? Yes ✓ No____ N/A____ – arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the type of injuries or illnesses which could result from fires, explosions or releases at the facility? Yes ✓ No____ N/A____	
	Subpart D: Contingency Plan and Emergency Procedures	
(725.151a)	Is the contingency plan available? Yes ✓ No____ N/A____ If "No", skip to Section 725.155. Is the plan designed to protect human health and the environment from releases to the air, soil and water? Yes ✓ No____ N/A____	
(725.151b)	Has there been a fire, explosion or release of hazardous waste? Yes____ No____ N/A ✓ If "Yes", has the contingency plan been carried out immediately? Yes____ No____ N/A ✓	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
	Subpart I: Use and Management of Containers	
	Has the generator closed an accumulation area? Yes____ No____ N/A ✓	
(725.211) (725.214)	If "Yes", was the accumulation area closed in accordance with Sections 725.211 and 725.214? Yes____ No____ N/A ✓	
(725.271)	If the containers have leaked or are in poor condition, has the owner/operator transferred the hazardous waste to a suitable container? Yes____ No____ N/A ✓	
(725.272)	Is the waste compatible with the container and/or liner? Yes ✓ No____ N/A____	
(725.273a)	Are containers of hazardous waste always closed except to remove or add waste during accumulation? Yes ✓ No____ N/A____	
(725.273b)	Are containers of hazardous waste being opened, handled, or stored in a manner which will prevent the rupture of the container or prevent it from leaking? Yes ✓ No____ N/A____	
(725.274)	Is the owner/operator inspecting the accumulation area(s) at least weekly, looking for leaks or deterioration? Yes ✓ No____ N/A____	
	Is the accumulation area free from any evidence of leaking or deteriorating containers? (See also Section 725.131) Yes ✓ No____ N/A____	
(725.276)	Are containers holding ignitable or reactive wastes located at least 15 meters (50 feet) from the facility's property line? Yes ✓ No____ N/A____	
	Note: See Section 725.117(a) for additional requirements for ignitable, reactive or incompatible wastes.	
(725.277)	Is the owner/operator complying with the requirements concerning incompatible wastes? Yes ✓ No____ N/A____	
	Comments:	
	Does the generator accumulate and/or treat hazardous waste in tanks? Yes ✓ No____ N/A____	
	Note: If "No", go to Subpart C.	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.152a)	Does the plan describe the actions required for response to:	
	– fires? Yes ✓ No____ N/A____	
	– explosions? Yes ✓ No____ N/A____	
	– releases? Yes ✓ No____ N/A____	
(725.152c)	Does the plan describe arrangements with:	
	– police and fire departments? Yes ✓ No____ N/A____	
	– hospitals? Yes ✓ No____ N/A____	
	– contractors? Yes ✓ No____ N/A____	
	– emergency response teams? Yes ✓ No____ N/A____	
(725.152d)	Does the plan contain the current emergency coordinator's name, phone (office and home) and address?	
	Yes ✓ No____ N/A____	
(725.152e)	Does the plan identify all emergency equipment including:	
	– description? Yes ✓ No____ N/A____	
	– capability? Yes ✓ No____ N/A____	
	– location? Yes ✓ No____ N/A____	
	Is the list of emergency equipment up–to–date?	
	Yes ✓ No____ N/A____	
(725.152f)	Does the plan include:	
	– an evacuation plan? Yes ✓ No____ N/A____	
	– an evacuation signal? Yes ✓ No____ N/A____	
	– alternate evacuation routes? Yes ✓ No____ N/A____	
(725.153)	Has the contingency plan (including all revisions) been:	
	a) maintained at the facility? Yes ✓ No____ N/A____	
	b) submitted to:	
	– police department? Yes ✓ No____ N/A____	
	– fire department? Yes ✓ No____ N/A____	
	– hospital? Yes ✓ No____ N/A____	
	– emergency response teams? Yes ✓ No____ N/A____	
(725.154)	Has the contingency plan been reviewed and revised whenever:	
	a) regulations are revised? Yes ✓ No____ N/A____	
	b) the plan fails in an emergency? Yes____ No____ N/A ✓	
	c) the facility changes in a way that modifies the emergency response necessary?	
	Yes ✓ No____ N/A____	
	d) information regarding emergency coordinators changes?	
	Yes ✓ No____ N/A____	
	e) information regarding equipment changes?	
	Yes ✓ No____ N/A____	
(725.155)	Is the emergency coordinator on–site or on call at all times?	
	Yes ✓ No____ N/A____	
	Is the emergency coordinator familiar with all facility activities, wastes, records, layout and contingency plan?	
	Yes ✓ No____ N/A____	
	Does the emergency coordinator have the authority to commit the resources needed to carry out the actions specified in the contingency plan?	
	Yes ✓ No____ N/A____	
(725.156)	If the facility has had a release, fire or explosion, have the procedures of this Section been followed regarding assessment, response and reporting?	
	Yes____ No____ N/A ✓	
	Note: If the facility has had a release, explain in detail.	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
	Section 725.116: Personnel Training	
(725.116a)	Does the facility have a training program? Yes ✓ No____ N/A____	
	Have facility personnel 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 Part 725? Yes ✓ No____ N/A____	
	Is the program directed by a person trained in hazardous waste management procedures? Yes ✓ No____ N/A____	
	Does the program teach facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to the positions in which they are employed? Yes ✓ No____ N/A____	
	Does the program cover, at a minimum:	
	– procedures to familiarize facility personnel with emergency procedures, emergency equipment and emergency systems? Yes ✓ No____ N/A____	
	– procedures for using, inspecting, repairing and replacing facility emergency and monitoring equipment? Yes ✓ No____ N/A____	
	– key parameters for automatic waste feed cut-off systems? Yes ✓ No____ N/A____	
	– communications or alarm systems? Yes ✓ No____ N/A____	
	– response to fire or explosions? Yes ✓ No____ N/A____	
	– response to groundwater contamination incidents? Yes ✓ No____ N/A____	
	– shutdown of operations? Yes ✓ No____ N/A____	
(725.116b)	Have new employees completed the program within 6 months of the date of employment or assignment to a position requiring them to manage hazardous waste? Yes ✓ No____ N/A____	
(725.116c)	Have facility personnel received an annual review of the initial training? Yes ✓ No____ N/A____	
(725.116d)	Are the following documents and records being maintained at the facility:	
	1) the job title for each position related to hazardous waste management and the name(s) of the employee(s) filling each job? Yes ✓ No____ N/A____	
	2) a written job description for each position above, including the requisite skill, education or other qualifications and duties of personnel assigned to each position? Yes ✓ No____ N/A____	
	3) a written description of the type and amount of both initial and continuing training that will be given to each person filling a position dealing with hazardous waste management? Yes ✓ No____ N/A____	
	4) records documenting that the training or job experience has been given to and completed by facility personnel? Yes ✓ No____ N/A____	
(725.116e)	Is the facility maintaining training records until closure of the facility and those of former employees for at least 3 years from the last date of employment? Yes ✓ No____ N/A____	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
	Section 728.107: Waste Analysis and Recordkeeping	
(728.107a4)	Has the generator who treats a prohibited waste in tanks or containers in order to meet the treatment standards developed and followed a waste analysis plan? Yes ✓ No____ N/A____	
	Is the plan on-site? Yes ✓ No____ N/A____	
	Does the plan include a detailed physical and chemical analysis? Yes ✓ No____ N/A____	
	Has the plan been filed with the Agency at least 30 days prior to commencement of treatment activity? Yes ✓ No____ N/A____	
	Has the generator submitted the required notification and certification that the waste meets treatment standards when the waste is shipped off-site? Yes ✓ No____ N/A____	
	Subsection 722.134(c): Satellite Accumulation	
722.134(c)	Is the generator who accumulates hazardous waste at or near any point of generation where wastes initially accumulate and which is under the control of the operator of the process generating the waste limiting such accumulation to 55 gallons of hazardous waste or 1 quart of <u>acutely</u> hazardous waste marking the containers with the words "Hazardous Waste" or other words identifying the contents? Yes ✓ No____ N/A____	722.134(c)
	Has the generator who accumulates more than 55 gallons of hazardous waste or 1 quart of <u>acutely</u> hazardous waste compiled with the requirements of Section 722.134(a) within 3 working days? Yes____ No____ N/A ✓	
	If there are more than 55 gallons of hazardous waste or 1 quart of <u>acutely</u> hazardous waste in the satellite accumulation area, are the containers marked with the date accumulation began? Yes____ No____ N/A ✓	
	During the 3 day period, is the generator continuing to comply with the requirements of Section 722.134(c)(1) with respect to the excess waste? Yes____ No____ N/A ✓	
	Subpart D: Recordkeeping and Reporting	
	Section 722.140: Recordkeeping	
722.140(a)	Has the generator retained for a period of 3 years: – a copy of each signed manifest? Yes ✓ No____ N/A____	722.140(a)
722.140(b)	Has the generator retained a copy of each Annual Report and Exception Report for a period of at least three years from the due date of the report (March 1)? Yes ✓ No____ N/A____	722.140(b)
722.140(c)	Has the generator retained for a period of 3 years: – copies of test results, waste analyses or other determinations made in accordance with Section 722.111? Yes ✓ No____ N/A____	722.140(c)
722.140(d)	Does a generator who is involved in any unresolved enforcement action or as requested by the Director continue to maintain the records required in subsections a) and c)? Yes____ No____ N/A ✓	722.140(d)
	Section: 722.141: Annual Reporting	
722.141(a)	Has the generator who ships hazardous waste off-site for treatment, storage or disposal filed an annual report with the Agency by March 1 for the preceding calendar year? Yes ✓ No____ N/A____	722.141(a)
	Note: If "No", or if deficiencies are noted with the annual report reviewed, contact the Planning and Reporting Section.	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
722.141(b)	Has the generator who treats, stores or disposes of hazardous waste on-site, filed an annual report with the Agency by March 1 for the preceding calendar year? Yes ✓ No____ N/A____	722.141(b)
	Section 722.142: Exception Reporting	
722.142(a)(1)	If the generator has not received a copy of the manifest from the TSD facility within 35 days of the date of delivery to the transporter, has the generator contacted the transporter or the TSD facility to determine the status of the hazardous waste? Yes____ No____ N/A ✓	722.142(a)(1)
722.142(a)(2)	If the generator has not received a copy of the signed manifest within 45 days of the date of delivery to the transporter, has he filed an exception report with the Agency in accordance with the requirements of this Section? Yes____ No____ N/A ✓	722.142(a)(2)
	Section 722.143: Additional Reporting	
722.143	Has the generator furnished additional reports as required by the Director? Yes____ No____ N/A ✓	722.143
	Subpart E: Exports of Hazardous Waste	
	Is the generator an exporter of hazardous waste? Yes____ No____ N/A ✓	
	If "Yes", has the generator complied with the requirements of Subpart E? Yes____ No____ N/A ✓	
	Subpart F: Imports of Hazardous Waste	
	Is the generator an importer of hazardous waste? Yes____ No____ N/A ✓	
	If "Yes", has the generator complied with the requirements of Subpart F? Yes____ No____ N/A ✓	
	Subpart G: Farmers	
	Is the generator a farmer? Yes____ No____ N/A ✓	
	If "Yes", has the generator complied with the requirements of Subpart G? Yes____ No____ N/A ✓	
	Comments:	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
	Subpart J: Tank Systems	
	Has the generator closed an accumulation area? Yes____ No____ N/A ✓	
(725.211) (725.214)	If "Yes", was the accumulation area closed in accordance with Sections 725.211 and 725.214? Yes____ No____ N/A ✓	
(725.290)	Does the facility accumulate or treat hazardous waste in tanks? Yes ✓ No____ N/A____	
	Note: A generator may treat hazardous waste in a tank for less than 90 days without a RCRA permit.	
	If "No", skip Subpart J.	
	a) Tank systems that are used to accumulate or treat hazardous waste which contains no free liquids (using the Paint Filter Liquids Test) and that are situated inside a building with an impermeable floor are exempted from the requirements in Section 725.293. b) Tank systems, including sumps, that serve as part of a secondary containment sytem to collect or contain releases of hazardous wastes are exempted from the requirements in Section 725.293(a). c) Tanks, sumps and other collection devices used in conjunction with drip pads (as defined in Section 720.110) and regulated under Subpart W, must meet the requirements of this Subpart.	
(725.291a)	For tanks <u>existing</u> prior to July 14, 1986 (see definition of tank system under 720.110)and not protected by a secondary containment system, has a written assessment been reviewed and certified by an IRPE(*) in accordance with Section 702.126(d) by January 12, 1988 [except as provided in Section 725.291(c)]? Yes____ No____ N/A ✓	
(725.291b)	Does this assessment consider at least the following: 1) design standards for the tank and ancillary equipment? Yes____ No____ N/A ✓	
	2) hazardous characteristics of the wastes? Yes____ No____ N/A ✓	
	3) existing corrosion protection measures? Yes____ No____ N/A ✓	
	4) documented age of the tank system? Yes____ No____ N/A ✓	
	5) results of a leak test, internal inspection, or other tank integrity examination? Yes____ No____ N/A ✓	
(725.291c)	Has a tank system assessment been performed within 12 months after the materials in the tank become a hazardous waste? Yes ✓ No____ N/A____	
	Note: If an assessment indicates a tank system is leaking or unfit for use, the owner/operator must comply with the requirements of Section 725.291(b)(5).	
(725.292a)	For <u>new</u> tanks (see definition of new tanks under Section 720.110) whose installation commenced after 7/14/86, has a written assessment been reviewed and certified by an IRPE in accordance with Section 702.126(d) prior to operation of the tank system? Yes ✓ No____ N/A____	
	Does the assessment include, at a minimum, the following: 1) design standards for tanks and ancillary equipment? Yes ✓ No____ N/A____	
	2) hazardous characteristics of the waste(s) to be handled? Yes ✓ No____ N/A____	
	3) evaluation of potential for corrosion and corrosion protection measures for tank systems with metal components in contact with soil or water? Yes ✓ No____ N/A____	
	*IRPE = Independent Registered Professional Engineer	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
	4) design or operational measures that will protect underground tank systems from potential damage resulting from vehicular traffic? Yes____ No____ N/A✓ 5) designs to ensure adequate foundations, anchoring to prevent flotation or dislodgement and the ability to withstand the effects of frost heave? Yes____ No____ N/A✓	
(725.292g)	Has the owner/operator obtained and kept on file at the facility the written statements, including the certification statements [as required in Section 702.126(d)] of the design and installation requirements of Subsections (b) through (f)? Yes✓ No____ N/A____	
(725.293a)	Is **secondary containment** provided for any new tank system before being put into service? Yes✓ No____ N/A____ Does an existing tank, used to accumulate F020, F021, F022, F023, F026 or F027 waste(s), have secondary containment by 1/12/89? Yes____ No____ N/A✓ For an existing tank of documentable age, is secondary containment provided by 1/12/89 or when the tank is 15 years old, whichever is later? Yes✓ No____ N/A____ For an existing tank of undocumentable age, has secondary containment been provided by 1/12/95? Yes✓ No____ N/A____ or if the **facility** is older than 7 years, by the time the **facility** reaches 15 years of age or 1/12/89, whichever is later? Yes✓ No____ N/A____ For tanks that accumulate wastes that become hazardous after 1/12/87, has secondary containment been provided within the time intervals required in Subsections (a)(1) through (a)(4) substituting the date that a material becomes a hazardous waste for 1/12/87? Yes✓ No____ N/A____	
(725.293b)	Is the secondary containment system designed, installed and operated to prevent migration of wastes or accumulated liquid out of the system at any time? Yes✓ No____ N/A____ Is the secondary containment system capable of detecting and collecting releases and accumulated liquids until the collected material is removed? Yes✓ No____ N/A____	
(725.293c)	To meet the requirements of Subsection (b), is the secondary containment system: 1) compatible with the waste(s) in the tank and of sufficient strength and thickness to prevent failure? Yes✓ No____ N/A____ 2) placed on a foundation or base capable of providing support, providing resistance to pressure gradients and preventing failure due to settlement, compression of uplift? Yes✓ No____ N/A____ 3) provided with a leak detection system designed and operated to detect any release or accumulated liquid within 24 hours? Yes✓ No____ N/A____ 4) sloped or otherwise designed or operated to drain and remove liquids resulting from leaks, spills or precipitation? Yes✓ No____ N/A____ and is spilled or leaked waste and accumulated precipitation removed from the secondary containment within 24 hours? Yes✓ No____ N/A____ **Note:** A RCRA permit may allow for removal of liquids less frequently than 24 hours after accumulation.	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.293d)	Does the secondary containment for tanks have one or more of the following: 1) a liner (external to the tank); or 2) a vault; or 3) a double–walled tank; or 4) an equivalent device (approved by the Board)? Yes ✓ No____ N/A____	
(725.293e)	Does the external liner system(s), vault system(s) and/or double–walled tank(s) meet the additional requirements identified in Section 725.293(e)? Yes ✓ No____ N/A____	
(725.293f)	Is ancillary equipment protected by secondary containment that meets the requirement of Subsection (h) and (c)? Yes ✓ No____ N/A____ If "No": 1) Is aboveground piping (exclusive of flanges, joints, valves and connections) inspected daily? Yes ✓ No____ N/A____ 2) Are welded flanges, joints and connections inspected daily? Yes ✓ No____ N/A____ 3) Are sealless or magnetic coupling pumps and sealless valves inspected daily? Yes ✓ No____ N/A____ 4) Are pressurized aboveground piping systems with automatic shut–off devices inspected daily? Yes ✓ No____ N/A____	
(725.293i)	Until such time as secondary containment is provided, are the following requirements being met for all tank systems: 1) For non–enterable underground tanks, has an annual leak test that meets the requirements of 725.291(b)(5) been conducted? Yes____ No____ N/A ✓ 2) For other than non–enterable underground tanks and ancillary equipment, has an annual leak test, internal inspection or other tank integrity examination by an IRPE been conducted? Yes____ No____ N/A ✓ 3) Are written records maintained at the facility to document the assessments required under Subsections (i)(1) and (i)(2)? Yes____ No____ N/A ✓ **Note:** If a tank system is found to be leaking or unfit for use as a result of a leak test or assessment, the owner/operator must comply with Section 725.296.	
(725.294a)	Has the owner/operator placed hazardous wastes or treatment reagents in the tank system that could cause the system to rupture, leak, corrode or otherwise fail? Yes____ No ✓ N/A____	
(725.294b)	Do tanks and secondary containment have appropriate controls and practices to prevent spills and overflows including: 1) spill prevention controls? Yes ✓ No____ N/A____ 2) overfill prevention controls? Yes ✓ No____ N/A____ 3) sufficient freeboard in uncovered tanks? Yes____ No____ N/A ✓	
(725.294c)	**Note:** If a leak or spill has occurred in the tank system, the owner/operator shall comply with the requirements of Section 725.296.	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.295a)	Does the owner/operator inspect, if present, at least each operating day, the following: 1) overfill/spill control equipment? Yes ✓ No____ N/A____ 2) the aboveground portion of the tank system for corrosion or releases? Yes ✓ No____ N/A____ 3) data from monitoring equipment? Yes ✓ No____ N/A____ 4) the construction materials and the area immediately surrounding the external portion of the system? Yes ✓ No____ N/A____	
(725.295b)	If the tank system has cathodic protection, is the owner/operator complying with Section 725.295(b) to ensure that they are functioning properly? Yes ✓ No____ N/A____	
(725.295c)	Does the owner/operator document in the operating record, the results of tank inspections as required in Section 725.295(a) and (b)? Yes ✓ No____ N/A____	
(725.296)	If the tank system or secondary containment system has a leak or spill or is unfit for use, has the owner/operator: a) immediately ceased using; prevented flow or addition of waste and inspected the system to determine the cause of the release? Yes____ No____ N/A ✓ b) removed applicable waste from the system within 24 hours of detection? Yes____ No____ N/A ✓ c) immediately conducted a visual inspection of the release and taken actions to contain visible releases to the environment, prevented further migration to soils or surface water and removed and properly disposed of any contaminated soil or water? Yes____ No____ N/A ✓	
(725.296d)	d) notified the Agency within 24 hours of detection of release? Yes____ No____ N/A ✓ d)3) within 30 days of detection of release, submitted a report to the Agency that complies with the requirements of Section 725.296(d)(3)? Yes____ No____ N/A ✓ Note: Notification and reports are not necessary if less than 1 pound of material is spilled and it was immediatey contained and cleaned up.	
(725.296e)	e) repaired the tank system prior to returning the tank system to service in the event that a leak has occurred from the primary tank system into the secondary containment system? Yes____ No____ N/A ✓ e)4) provided secondary containment before returning a tank system to service in the event that the release was from a component of a tank system without secondary containment? Yes____ No____ N/A ✓ e)4) met the requirements for a new tank system in the event that a component is replaced during repair? Yes____ No____ N/A ✓ e)4) provided the entire component with secondary containment prior to being returned to use in the event that a leak has occurred in any portion of a component that is not readily accessible for visual inspection? Yes____ No____ N/A ✓	
(725.296f)	f) In the event that an extensive repair has been conducted in accordance with subsection (e), submitted to the Agency within 7 days after returning the tank system to use, a certification by an IRPE stating that the repaired system is capable of handling hazardous wastes without release for the intended life of the system? Yes____ No____ N/A ✓	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
	Note: If the owner/operator does not satisfy the requirements of subsections (e)(2) through (e)(4), the tank system must be closed in accordance with Section 725.297.	
(725.297a)	At the time of closure of a tank system, has the owner/operator removed or decontaminated all waste residues, contaminated components, contaminated soils and structures and equipment and managed them as hazardous waste [unless Section 721.103(d) applies]? Yes____ No____ N/A✓	
(725.297a)	Have the closure plan, closure activities, cost estimates for closure and financial responsibility for tank systems met all requirements specified in Subparts G and H? Yes✓ No____ N/A____	
(725.297b)	If the tank system cannot be "clean" closed, has the owner/operator closed the tank system and performed post–closure care in accordance with the closure and post–closure care requirements that apply to landfills (Section 725.410)? Yes____ No____ N/A✓	
	Note: Such a tank system is considered a landfill and must meet all of the requirements of landfills specified in Subparts G and H.	
(725.298a)	Are ignitable or reactive wastes placed in a tank system? Yes✓ No____ N/A____	
	If "No", skip to Section 725.299.	
	Is the waste treated, rendered or mixed before or immediately after placement in the tank system so that:	
	– the resulting waste, mixture or dissolved material is no longer ignitable or reactive? Yes____ No____ N/A✓	
	– Section 725.117(b) is complied with? Yes✓ No____ N/A____	
	or	
	Is the waste accumulated or treated so that it is protected from any material or conditions which may lead to ignition or reaction? Yes✓ No____ N/A____	
	or	
	Is the tank used solely for emergencies? Yes____ No____ N/A✓	
(725.298b)	Is the facility complying with the requirements regarding maintenance of protective distances between the waste management area and any public ways, streets, alleys or any adjoining property line? Yes✓ No____ N/A____	
(725.299)	Are incompatible wastes/materials placed in the same tank? Yes____ No✓ N/A____	
	If "No", skip to Section 725.300.	
	Is Section 725.117(b) being complied with? Yes____ No____ N/A✓	
	Has the tank system been properly decontaminated if it previously held an incompatible waste/material unless Section 725.117(b) is complied with? Yes____ No____ N/A✓	
	COMMENTS:	

Regulation	RCRA LDR INSPECTION CHECKLIST (PART 728)	Violation
	Part 728: Land Disposal Restrictions	
	Subpart A: General	
	Section 728.103: Dilution Prohibited as a Substitute for Treatment	
728.103(a)	Has a person diluted a restricted waste or a treatment residual of a restricted waste as a substitute for adequate treatment? Yes____ No____ N/A ✓	728.103(a)
	Note: Has any person filed for a petition to allow land disposal of wastes prohibited under Subpart C of Part 728? Yes____ No____ N/A ✓	
	Section 728.104: Treatment Surface Impoundment Exemption	
728.104	Are wastes that are otherwise prohibited from land disposal under this Part being treated in a surface impoundment that meets the requirements of this Section? Yes____ No____ N/A ✓	728.104
	Section 728.107: Waste Analysis and Recordkeeping	
728.107(a)	Has the generator tested the waste [as specified in 728.107(a)] or used knowledge of the waste to determine if the waste is restricted from land disposal? Yes ✓ No____ N/A____	728.107(a)
728.107(a)(1)	If a generator determines that its waste is restricted, has a notice been sent with each shipment that includes the following information: A) USEPA Hazardous Waste Number? Yes ✓ No____ N/A____	728.107(a)(1)
	B) corresponding treatment standards or a reference to the treatment standard by section or applicable treatment code? Yes ✓ No____ N/A____	
	C) manifest number associated with the shipment of waste? Yes ✓ No____ N/A____	
	D) for hazardous debris, the contaminants subject to treatment as provided by Section 728.145(b) and the following statement: "This hazardous debris is subject to the alternative treatment standards of Section 728.145?" Yes____ No____ N/A ✓	
	E) waste analysis data, where available? Yes ✓ No____ N/A____	
728.107(a)(2)	Has the generator of a restricted waste that meets the applicable treatment standards submitted, with each shipment, a notice and certification, as specified in this Section, stating that the waste meets applicable treatment standards and can be land disposed without further treatment? Yes____ No____ N/A ✓	728.107(a)(2)
728.107(a)(3)	Has the generator of a restricted waste that has been exempted under Section 728.106 submitted a notice, as specified in this section, with each shipment to the receiving facility, stating that the waste is not prohibited from land disposal? Yes____ No____ N/A ✓	728.107(a)(3)
728.107(a)(4)	Has the generator who treats a prohibited waste in tanks or containers in order to meet the treatment standards developed and followed a waste analysis plan? Yes ✓ No____ N/A____	728.107(a)(4)
	Is the plan on-site? Yes ✓ No____ N/A____	
	Does the plan include a detailed physical and chemical analysis? Yes ✓ No____ N/A____	
	Has the plan been filed with the Agency at least 30 days prior to commencement of the treatment activity? Yes ✓ No____ N/A____	

Regulation	RCRA LDR INSPECTION CHECKLIST (PART 728)	Violation
	Has the generator submitted the required notification and certification that the waste meets treatment standards when the waste is shipped off-site? Yes ✓ No___ N/A___	
728.107(a)(5)	Has the generator who has determined that the waste is restricted based on the generator's knowledge and/or testing of the waste retained all supporting data used to make this determination on-site? Yes ✓ No___ N/A___	728.107(a)(5)
728.107(a)(6)	If a generator determines, subsequent to the time of generation, that the generator is managing a restricted waste which is excluded from the definition of hazardous or solid waste or exempt from RCRA, has a one-time notification stating such generation been placed in the generator's files? Yes___ No___ N/A ✓	728.107(a)(6)
728.107(a)(7)	Does a generator keep on-site a copy of all notices, certifications, demonstrations, waste analysis data and other documentation produced pursuant to this Section for at least five years from the date of the latest shipment? Yes ✓ No___ N/A___	728.107(a)(7)
728.107(a)(8)	If a generator is managing a lab pack that contains waste identified in Appendix D of Part 728 and wishes to use the alternative treatment standard under Section 728.142, has the generator submitted a notice and certification to the treatment facility with each shipment in accordance with this subsection? Yes___ No___ N/A ✓	728.107(a)(8)
728.107(a)(9)	If a generator is managing a lab pack that contains organic waste identified in Appendix E of Part 728 and wishes to use the alternative treatment standard, has the generator submitted a notice and certification to the treatment facility with each shipment in accordance with this subsection? Yes___ No___ N/A ✓	728.107(a)(9)
728.107(a 10)	Has a small-quantity generator with a tolling agreement pursuant to Section 722.120(e) retained on site a copy of the notification and certification of the initial waste shipment together with the tolling agreement for at least 3 years after the termination or expiration of the agreement? Yes___ No___ N/A ✓	728.107(a)(10)
728.107(b)	Has the treatment facility tested its waste according to the frequency specified in its waste analysis plan as required by Sections 724.113 or 725.113 and subsections (b)(1), (b)(2) and (b)(3) of this section? Yes ✓ No___ N/A___	728.107(b)
728.107(b)(4)	Has the treatment facility sent a notice to the land disposal facility with each shipment of waste that includes the following information: A) USEPA Hazardous Waste Number? Yes___ No___ N/A ✓ B) corresponding treatment standards or a reference to the treatment standard by section or applicable treatment code? Yes___ No___ N/A ✓ C) manifest number associated with the shipment of waste? Yes___ No___ N/A ✓ D) waste analysis data, where available? Yes___ No___ N/A ✓	728.107(b)(4)
728.107(b)(5)	Has the treatment facility submitted a certification, as specified in 728.107(b)(5), with each shipment of hazardous waste or treatment residue to the land disposal facility? Yes___ No___ N/A ✓	728.107(b)(5)
728.107(b)(6)	If the waste or treatment residue will be further managed at a different treatment or storage facility, is the treatment facility sending the waste complying with the notice and certification requirements of Section 728.107(a)? Yes ✓ No___ N/A___	728.107(b)(6)

Regulation	RCRA LDR INSPECTION CHECKLIST (PART 728)	Violation
728.107(b)(7)	Has the recycling facility that is making off-site shipments of recyclable materials used in a manner constituting disposal: – submitted to the Agency a notice and certification with each shipment in accordance with 728.107(b)(4) and (b)(5)? Yes ✓ No___ N/A___ – kept records of the name and location of each entity receiving the hazardous waste-derived product? Yes ✓ No___ N/A___	728.107(b)(7)
728.107(c)	Has the owner/operator of any land disposal facility disposing of any restricted waste, except where the waste being disposed of is a recyclable material used in a manner constituting disposal: 1) maintained copies of the notice and certification specified in subsection 728.107(a) or (b)? Yes___ No___ N/A ✓ 2) tested the waste to ensure that it is in compliance with applicable treatment standards or prohibitions? Yes___ No___ N/A ✓	728.107(c)
728.107(c)(4)	**Note:** If the owner/operator is disposing of any waste that is a recyclable material used in a amanner constituting disposal, the owner/operator is not subject to the subsections (c)(1) and (c)(2) with respect to such waste.	
728.107(d)	Has the generator or treater who first claims that their hazardous debris is excluded from the definition of a hazardous waste under Section 728.103(f)(2) provided the following notification and certification: 1) a one-time notification submitted to the Agency including the following information: A) the name and address of the RCRA Subtitle D facility receiving the treated debris? Yes___ No___ N/A ✓ B) a description of the hazardous debris as initially generated including the applicable USEPA hazardous waste number(s)? Yes___ No___ N/A ✓ C) for debris excluded under Section 728.103(f)(2), the technology from Section 728, Table F? Yes___ No___ N/A ✓ 2) Has the notification been updated if the debris is shipped to a different facility or if a different technology is used to treat the debris? Yes___ No___ N/A ✓ 3) For debris excluded under Section 728.103(f)(2), has the owner/operator of the treatment facility documented and certified compliance with the treatment standards of Section 728, Table F pursuant to this Subsection? Yes___ No___ N/A ✓	728.107(d)
	Section 728.109: Special Rules for Characteristic Wastes	
728.109(a)	Has the generator determined each USEPA hazardous waste code applicable to the waste in order to determine the applicable treatment standards under Subpart D? Yes ✓ No___ N/A___	728.109(a)
	Note: For purposes of this Part, the waste will carry the waste code for any applicable listing under Part 721, Subpart D and one or more of the waste codes under Part 721, Subpart C where the waste exhibits the relevant characteristic, except in the case when the treatment standard for the Subpart D waste code operates in lieu of the standard for the Subpart C waste code as specified in subsection (b).	
728.109(b)	Does the waste meet the treatment standards for all applicable listed and characteristic waste codes? Yes ✓ No___ N/A___	728.109(b)
	Note: Where a prohibited waste is both listed and characteristic, the treatment standard for the listed waste code will operate in lieu of the standard for the characteristic waste code, provided that the treatment standard for the listed waste includes a treatment standard for the constituent that causes the waste to exhibit the characteristic.	

Regulation	RCRA LDR INSPECTION CHECKLIST (PART 728)	Violation
728.109(c)	Has the generator land disposed any prohibited waste which exhibits a characteristic under Part 721, Subpart C only if the waste complies with the treatment standards under Part 728, Subpart D (in addition to any applicable standards determined from the initial point of generation)? Yes____ No____ N/A ✓	728.109(c)
728.109(d)	1) Has the generator sent the required notification and certification to the appropriate Agency for each shipment of waste that no longer exhibits the characteristic to a Subtitle D landfill? Yes____ No____ N/A ✓ Does the notification include the following information: A) name and address of the non-hazardous waste facility receiving the shipment? Yes____ No____ N/A ✓ B) description of the waste as initially generated, including USEPA hazardous waste number(s), applicable wastewater or nonwastewater category and the subdivisions made within a waste code based on waste specific criteria (such as D003, reactive cyanides)? Yes____ No____ N/A ✓ C) treatment standards applicable to the waste at the initial point of generation? Yes____ No____ N/A ✓ 2) Has the certification been signed by an authorized representative and is the language stated as required in Section 728.107(b)(5)(A)? Yes____ No____ N/A ✓	728.109(d)
	Subpart C: Prohibition on Land Disposal	
	Section 728.130: Waste Specific Prohibitions -- Solvent Wastes	
728.130	Has the generator of a spent solvent waste (F001-F005) land disposed the waste only after having: 1) met the treatability standards of Part 728, Subpart D; or Yes____ No____ N/A ✓ 2) been granted an exemption from a prohibition pursuant to a petition under Section 728.106; or Yes____ No____ N/A ✓ 3) been granted an extension to the effective date of prohibition pursuant to Section 728.105? Yes____ No____ N/A ✓	728.130
	Section 728.131: Waste Specific Prohibitions -- Dioxin-Containing Wastes	
728.131	Has the generator of a dioxin-containing waste (F020, F021, F022, F023, F026, F027 or F028) land disposed the waste only after having: 1) met the treatability standards of Part 728, Subpart D; or Yes____ No____ N/A ✓ 2) been granted an exemption from a prohibition pursuant to a petition under Section 728.106; or Yes____ No____ N/A ✓ 3) been granted an extension to the effective date of prohibition pursuant to Section 728.105? Yes____ No____ N/A ✓	728.131
	Section 728.132: Waste Specific Prohibitions -- California List Wastes	
728.132	Has the generator of a California List Waste land disposed the waste only after having: 1) been granted an adjusted standard from a prohibition pursuant to a petition under Section 728.106 (except for liquid hazardous waste containing PCBs at concentrations greater than or equal to 500 ppm which are not elegible for exemptions; or Yes____ No____ N/A ✓ 2) been granted an extension to the effective date of prohibition pursuant to Section 728.105? Yes____ No____ N/A ✓ 3) met the applicable treatment standards specified in Subpart D or, where treatment standards are not specified, the wastes are in compliance with the applicable prohibitions set forth in this Section or Section 728.139? Yes____ No____ N/A ✓	728.132

Regulation	RCRA LDR INSPECTION CHECKLIST (PART 728)	Violation
	Section 728.133: Waste Specific Prohibitions -- First Third Wastes	
728.133	Has the generator of a first third waste land disposed the waste only after having:	
	1) met the treatability standards of Part 728, Subpart D; or Yes____ No____ N/A ✓	728.133
	2) been granted an adjusted standard pursuant to Section 728.106; or Yes____ No____ N/A ✓	
	3) been granted an extension to the effective date of prohibition pursuant to Section 728.105? Yes____ No____ N/A ✓	
728.133(g)	Has the generator of a first third waste tested the waste or used knowledge of the waste to determine whether it exceeds the applicable treatment standards? Yes____ No____ N/A ✓	728.133(g)
	Section 728.134: Waste Specific Prohibitions -- Second Third Wastes	
728.134	Has the generator of a second third waste land disposed the waste only after having:	
	1) met the treatability standards of Part 728, Subpart D; or Yes____ No____ N/A ✓	728.134
	2) been granted an extension to the effective date of prohibition pursuant to Section 728.105; or Yes____ No____ N/A ✓	
	3) been granted an exemption pursuant to Section 728.106? Yes____ No____ N/A ✓	
728.134(i)	Has the generator of a second third hazardous waste tested the waste or used his knowledge of the waste to determine whether it exceeds the applicable treatment standards of 728.141 or 728.143? Yes____ No____ N/A ✓	728.134(i)
	Section 728.135: Waste Specific Prohibitions -- Third Third Wastes	
728.135	Has the generator of a third third waste land disposed the waste only after having:	
	1) met the treatability standards of Part 728, Subpart D; or Yes____ No____ N/A ✓	728.135
	2) been granted an exemption from a prohibition pursuant to a petition under Section 728.108; or Yes____ No____ N/A ✓	
	3) met the applicable alternate standards established pursuant to a petition granted under Section 728.144; or Yes____ No____ N/A ✓	
	4) been granted an extension to the effective date of a prohibition pursuant to Section 728.105? Yes____ No____ N/A ✓	
728.135(j)	Has the generator of a third third waste listed in 728.110, 728.111 or 728.112 tested the waste or used his knowledge of the waste to determine whether it exceeds the applicable treatment standards of Sections 728.141 or 728.143? Yes ✓ No____ N/A____	728.135(j)
	Section 728.139: Statutory Prohibitions	
728.139	Has a person caused, threatened or allowed the land disposal of any waste in violation of Section 3004 of RCRA? Yes____ No____ N/A ✓	728.139
	Subpart E: Prohibitions on Storage	
	Note: Except as provided in this section, the storage of hazardous wastes restricted from land disposal under Subpart C is prohibited.	
	Section 728.150: Prohibitions on Storage of Restricted Wastes	
728.150(a)(1)	Has the generator stored restricted wastes in tanks or containers on-site solely for the accumulation of such quantities as necessary to facilitate proper recovery, treatment or disposal? Yes ✓ No____ N/A____	728.150(a)(1)
	Has the generator complied with the requirements of Section 722.134? Yes ✓ No____ N/A____	

Regulation	RCRA LDR INSPECTION CHECKLIST (PART 728)	Violation
	Note: A generator in existence on the effective date of regulation under this Part and who must store hazardous wastes for more than 90 days due to regulations under this Part becomes a TSD and must obtain a RCRA permit.	
728.150(a)(2)	Has the owner/operator of a TSD stored restricted wastes in tanks or containers solely for the accumulation of such quantities of hazardous waste to facilitate proper recovery, treatment or disposal? Yes ✓ No___ N/A___ If yes, has the owner/operator: A) clearly marked each container to identify its contents and the accumulation start date? Yes ✓ No___ N/A___ B) clearly marked each tank to identify its contents, recorded the quantity of each hazardous waste received and indicated the accumulation start date, all in accordance with the operating record requirements of 724.173 or 725.173? Yes ✓ No___ N/A___	728.150(a)(2)
728.150(a)(3)	Has the transporter stored manifested shipments of such wastes at a transfer facility for 10 days or less? Yes___ No___ N/A ✓	728.150(a)(3)
728.150(b)	Has the owner/operator of a TSD stored restricted wastes up to one year solely for accumulation of such quantities of hazardous waste as necessary to facilitate proper recovery, treatment or disposal? Yes___ No___ N/A ✓	728.150(b)
728.150(c)	Has the owner/operator of a TSD who has stored such wastes beyond one year proved that such storage was solely for the accumulation of such quantities of hazardous waste to facilitate proper recovery, treatment or disposal? Yes___ No___ N/A ✓	728.150(c)
	Note: If a generator's waste is exempt from a prohibition on the type of land disposal utilized for the waste (e.g. case–by–case extension, incorporated by reference or an approved petition) the prohibition in subsection (a) does not apply during the period of such exemption. **Note:** The prohibition in subsection (a) does not apply to hazardous wastes that meet the treatment standards (728.141, 728.142 and 728.143) or the adjusted treatment standards (728.144) or where the treatment standards have not been specified, is in compliance with the applicable prohibitions in 728.132 or 728.139.	
728.150(f)	Have liquid hazardous wastes containing PCBs at concentrations greater than 50 ppm been stored at a facility that meets the requirements of 40 CFR 261.65(b) and have they been removed from storage and treated or disposed as required by this Part within one year of the date when such wastes were first placed into storage? Yes___ No___ N/A ✓	728.150(f)
	Note: The provisions of subsection (c) do not apply to such PCB wastes prohibited under Section 728.132.	
	COMMENTS:	

RCRA Part B Inspection Site # 0316000053

Section I: Containers

	Compliance	
A. Hazardous Waste Management Units	(YES)	NO
B. Waste Identification	(YES)	NO
C. Condition of Containers	(YES)	NO
D. Compatibility of Containers	(YES)	NO
E. Management of Containers	(YES)	NO
F. Inspections	(YES)	NO
G. Containment	(YES)	NO
H. Ignitable or Reactive Wastes	(YES)	NO
I. Special Requirements for Incompatible Wastes	(YES)	NO
J. General Operating Requirements	(YES)	NO
K. Closure Requirements	(YES)	NO

Description of violation: _____

Section II: Tank Systems

	Compliance	
B. Waste Identification	(YES)	NO
C. Containment and Detection of Releases	(YES)	NO
D. General Construction Requirements	(YES)	NO
E. General Operating Requirements	(YES)	NO
F. Tank System Certification	(YES)	NO
G. Response to Leaks or Spills	(YES)	NO

Section II: Tank Systems (continued)

	Compliance	
H. Inspections	(YES)	NO
I. Reporting and Recordkeeping	(YES)	NO
J. Ignitable and Reactive Wastes	(YES)	NO
K. Special Requirements for Incompatible Wastes	(YES)	NO
L. Closure	(YES)	NO

Description of violations: _____

Section III: Reporting and Notification Requirements

	Compliance	
Containers	(YES)	NO
Tank Systems	(YES)	NO
Corrective Action	(YES)	NO
Standard Conditions	(YES)	NO
Additional Special Conditions	(YES)	NO

Description of violations: _____

Section IV: Corrective Action

	Compliance	
E. Financial Assurance for Corrective Action	(YES)	NO
F. Notification Requirements for and Assessment of Newly-Identified Solid Waste Management Unit(s)	(YES)	NO
G. Future Releases from SWMUs	(YES)	NO
H. Completion of Corrective Action	(YES)	NO

Description of violations: _____

Section V: Standard Conditions

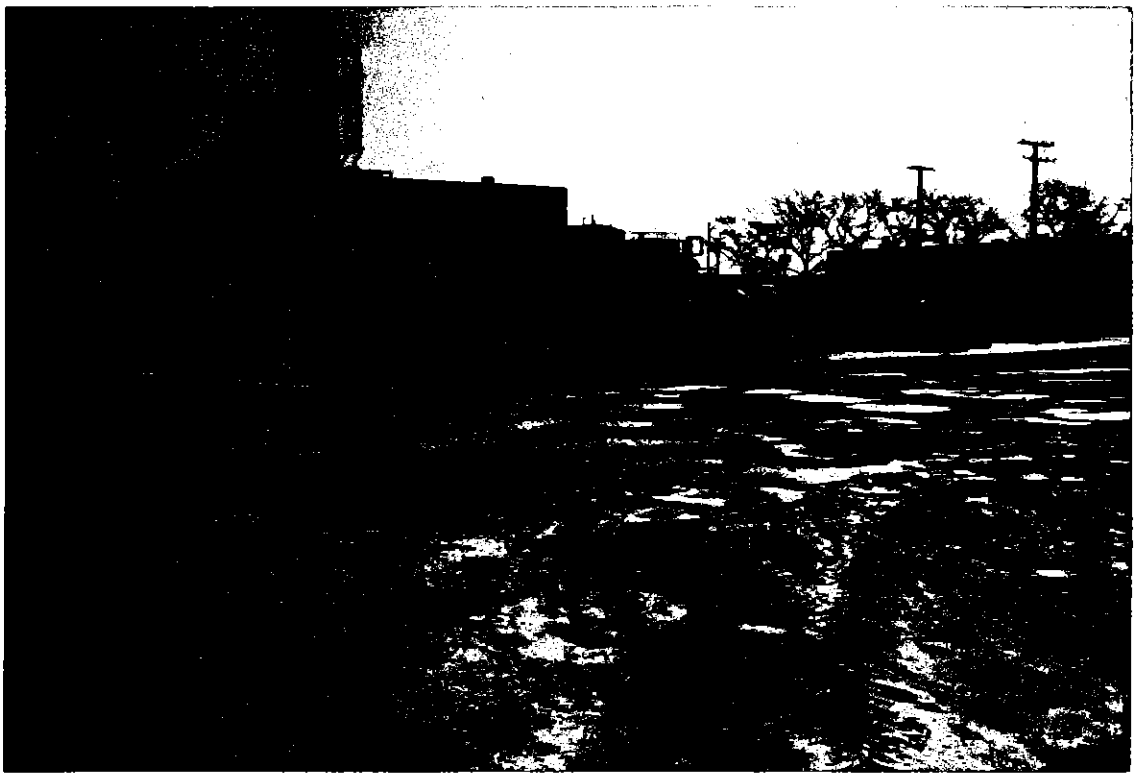
	Compliance	
A. General Requirements	(YES)	NO
B. General Facility Standards	(YES)	NO
C. Preparedness and Prevention	(YES)	NO
D. Contingency Plan	(YES)	NO
E. Manifest System, Recordkeeping and Reporting	(YES)	NO
F. Closure	(YES)	NO
G. Land Disposal Restrictions	(YES)	NO

Description of violations: _____

Illinois Environmental Protection Agency Photographs

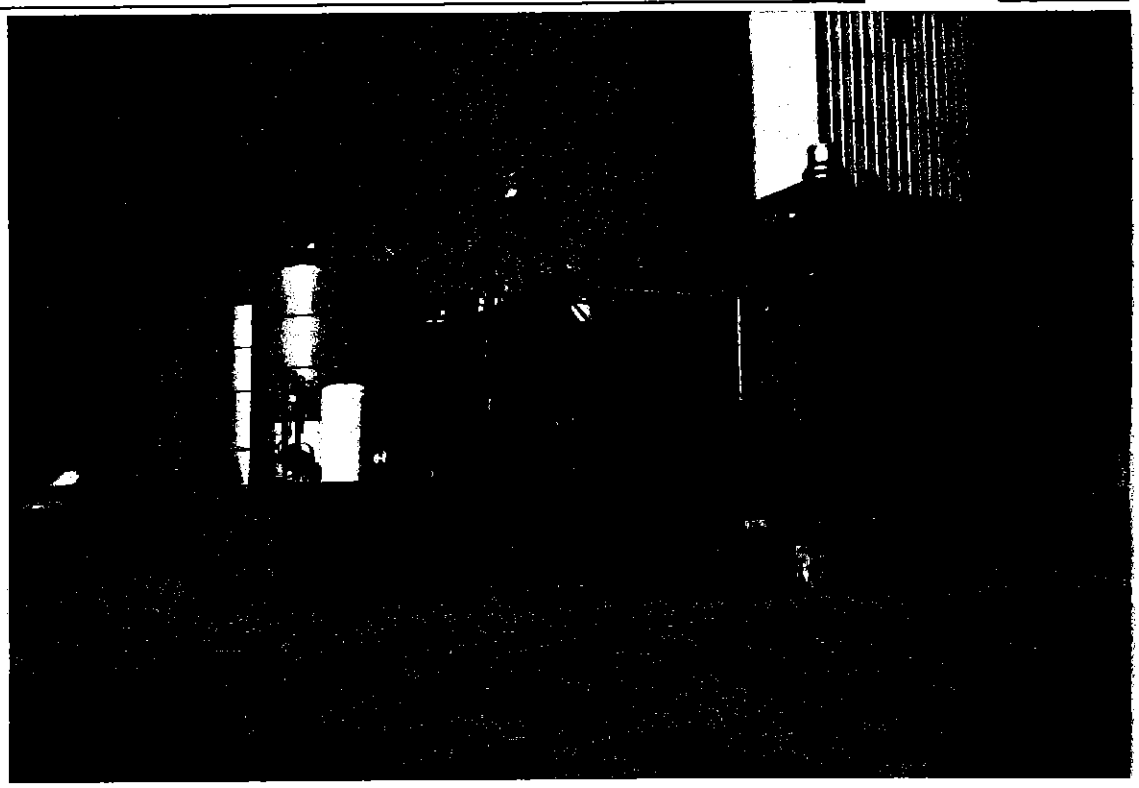
Site Name: Safety-Kleen Corp. Chicago RC IEPA#: 0316000053

Date: January 24, 1996 Time: 8:30A - 10:30A Photograph By: Anna Van Orden



Comments: Facing southeast - Container Storage Area

Roll #: 96-297 Photo#: 1



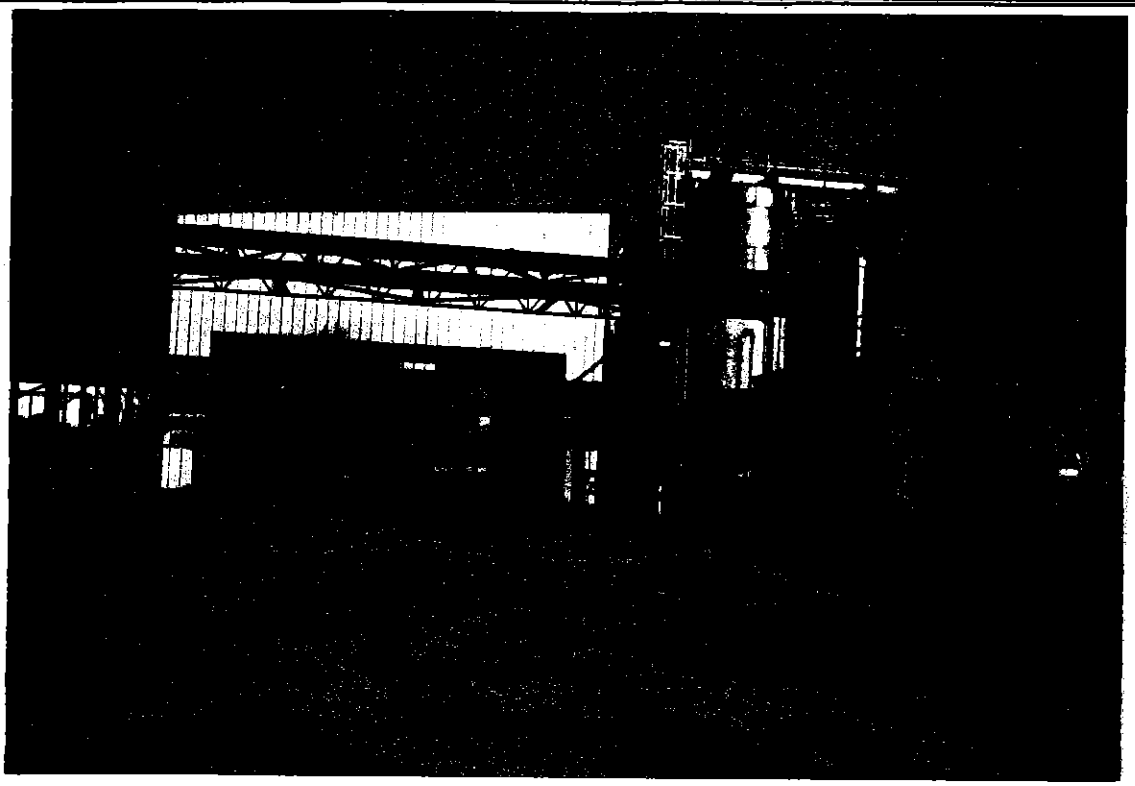
Comments: Facing northwest - Tank Farm #4

Roll #: 96-297 Photo# 2

Illinois Environmental Protection Agency Photographs

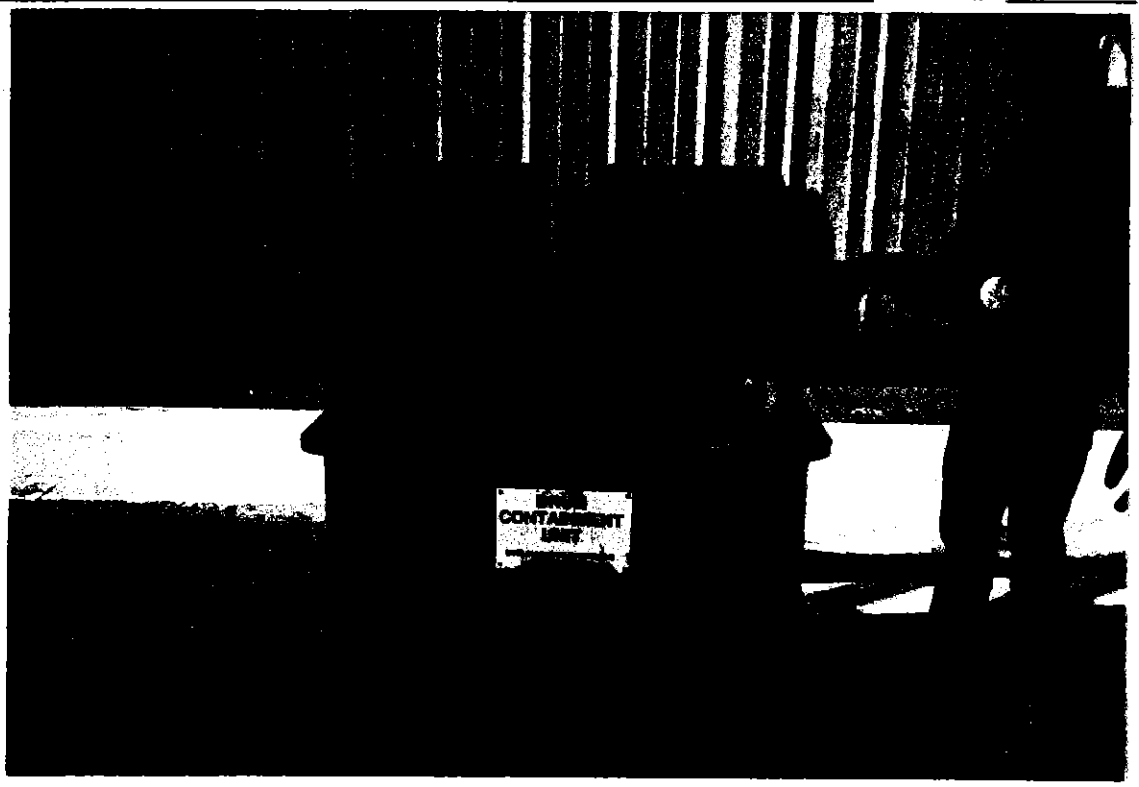
Site Name: Safety-Kleen Corp. Chicago RC IEPA#: 0316000053

Date: January 24, 1996 Time: 8:30A - 10:30A Photograph By: Anna Van Orden



Comments: Facing north - Truck Station #1 and Tank Farm #5

Roll #: 96-297 Photo#: 3



Comments: Facing east - Satellite accumulation area

Roll #: 96-297 Photo# 4

Illinois Environmental Protection Agency
Division of Land Pollution Control

RCRA INSPECTION REPORT

USEPA #: IL D005450697		IEPA #: 0316000053	
Facility Name: Safety-Kleen Corporation Chicago RC		Phone #: 312/247-2828	
Street Address: 1445 West 42nd Street		County: Cook	
City: Chicago	State: IL	Zip: 60609	
Region: 2	Inspection Date: 7 / 11 / 95	From: 9:00AM	To: 11:00Noon
Weather:			

TYPE OF FACILITY

Notified As: G, Trans, TSD, WAF, OSF	Regulated As: G, S, WAF
LDF? No (Yes or No) HPV? No	90-Day F/U Required?: YES ____ NO XXX

TYPE OF INSPECTION

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

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

NON-REGULATED STATUS N/A

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

PART A

Notification Date: 8 / 5 / 80 , from (initial) or (subsequent) Notification.

Initial Part A Date: 11 / 19 / 80 Amended: 9 / 24 / 90

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

PART B PERMIT APPLICATION

Part B Permit Submitted: (Y) or N 11 / 19 / 88 Final Permit Issued: 9 / 30 / 92

ENFORCEMENT N/A

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

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

ORDERS ISSUED N/A

CACO: ___ / ___ / ___ CAFO: ___ / ___ / ___ Consent Decree: ___ / ___ / ___

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

TSD FACILITY ACTIVITY SUMMARY

Activity by Process Code	On Part A?	Activity Conducted Prior to 19807	Was Activity Ever Done?	Closed	Being done at Time of Insp.?	Exempt per 35 IAC, Sec.	On Annual Report 1993	1992	1991
S01	Yes	Yes	Yes	No	Yes	N/A	Yes	Yes	Yes
S02	Yes	Yes	Yes	No	Yes	N/A	Yes	Yes	Yes
R03	N/A	Yes	Yes	N/A	Yes	725.101(c)(b)	No	No	No

RECEIVED
AUG 03 1995
IEPA-DLPC

OWNER		OPERATOR	
Name	Safety-Kleen Corporation	Name	Safety-Kleen Corp. Chicago RC
Address	1000 North Randell Road	Address	1445 W. 42nd Street
City	Elgin	City	Chicago
State	IL Zip 60123	State	IL Zip 60609
Phone #	708/697-8460	Phone #	312/247-2828

PERSON(S) INTERVIEWED	TITLE	PHONE #
Alfred Aghapour	Facility Manager	312/247-2828
Ted Zajack	Operations Manager	312/247-2828

INSPECTION PARTICIPANT(S)	AGENCY/TITLE	PHONE #
Anna Van Orden	IEPA/EPS	708/338-7900
Trish Wells	RPMS	708/338-7900

PREPARED BY	AGENCY/TITLE	PHONE #
Anna Van Orden	IEPA/EPS	708/338-7900

SUMMARY OF APPARENT VIOLATIONS

Area	Class	Section

Area	Class	Section

Area	Class	Section

Safety-Kleen Corp. Chicago RC
0316000053 ILD005450697
July 11, 1995

Narrative prepared by:
Anna Van Orden

NARRATIVE

The Safety-Kleen Chicago RC(SKCRC) is an organic chemicals reclamation and recycling facility permitted to treat and store hazardous waste under a Part B Permit.

The SKCRC accepts organic chemicals and solvent wastes from industrial and commercial facilities. Reclamation and recycling operations involve either regeneration of the spent solvent or blending and processing of the material for use as a hazardous waste fuel.

Processes utilized in the reclamation of used solvents, solvent mixtures and other solvent containing wastes include neutralization, distillation, fractionation, liquid-liquid extraction and drying.

SKCRC handles primarily two accounts:

1) The Toll Business - The toll customer (generally industrial accounts) ships waste or off-specification material to the SKCRC for treatment. The facility reclaims the material to the customer's specifications and returns the material to the generator.

2) The Recycling Business - The recycling business consists of industrial solvents which come to the SKCRC from Safety-Kleen sales network. These waste materials are recycled at the facility to Safety-Kleen corporate specifications and the processed material is sold as product on the market.

HAZARDOUS WASTE UNITS

TYPE	ACTIVE	CLOSED	WASTES	SIZE/ CAPACITY	(D)IKED;(C)ONCRETE/DIR(T)/ (G)RAVEL FLOOR;TYPE OF SECONDARY CONTAINMENT
SO1	Y	N	Numerous, See Part B	108,900 Gallons	D; C; Catch Basin
SO2	Y	N	Numerous, See Part B	1,119,865 Gallons	D; C; Vault w/coating on concrete

RECEIVED
AUG 0 3 1995
IEPA-DLPC

HAZARDOUS WASTES

Still Bottoms - F001-F002, and D001-D00X
- Residual material from the distillation process
- Shipped to Safety-Kleen in Clarksville, MO for fuel blending or reclamation.
- Rate of generation: 30,000 - 60,000 gal/month
- Amount on site: 54,972 gallons in bulk and 4,850 gallons in drums.

Spent Solvent - D001, D006, D008, D018, D035, D040
- Waste generated from two parts washers and one immersion cleaner unit.
- Shipped to Safety-Kleen in Dolton, IL for reclamation.
- Rate of generation: 30-40 gallons quarterly
- Amount on site: 0

Hazardous Waste Solids - F001, F002 and D001-D00X
- Waste generated by various methods:
  - Cleaning out tanks
  - Used oil dry
  - Hose drippings
  - Cut drums in order to remove solid material
  - Used filters from filtering material from waste and product tanks
- Shipped to Safety-Kleen in Hebron, OH for fuel blending/ reclamation or further treatment.
- Rate of generation: 15-20 55 gallon drums/month
- Amount on site: 64/55 gallon drums

Remanifasted Waste - F002, F003, D001, D002, D027
- Waste generated from manifesting errors and temporary storage.
- Shipped to WIT in East Liverpool, OH for fuel recovery.
- Rate of Generation: 1TT every 10-14 days.
- Amount on-site: 0

RO Waste Flammable Liquid - F001
- Waste generated from processes utilized at the site.
- Shipped to Safety-Kleen in Smithfiels, Kentucky for fuel blending.
- Rate of generation: 1TT every 2 weeks.
- Amount on-site: 5,298 gallons.

OBSERVATIONS

Facility is manifesting a new wastestream (RQ Waste Flammable Liquid) from processing operations. Previously the waste was treated on-site. It will be reported on the annual Report for the year 1995.

Facility has received an approval letter to the Phase II RCRA Facility Investigation (RFI) Workplan.

Facility is looking into starting a silver recovery system at the site.

At the time of the inspection, this facility was regulated as a generator, treatment, storage facility and marketer of hazardous waste fuel. The facility appeared to be in compliance with all applicable RCRA regulations and their Part B Permit requirements.

Facility Name:	Safety-Kleen Corp., Chicago RC
USEPA #: IL	D005450697
IEPA #:	0316000053

WASTE DISPOSITION FORM

Waste Name (include haz & waste for which no determination has been made)	Generating Process (For waste gen. on site. N/A for TSD	Date of Last Analysis	USEPA Haz Waste #	*On 8700-12	*On 3510-3	On Annual Report for: (Circle if present; cross out if not present) *19 94	*19 93	*19 92	Amount on Site	Rate of Generation	Last manifested Shipment	Disposition
Still Bottoms	Residue from distillation process	Every Shipment	F001-F005 D001-D00X	Y	Y	G F	G F	G F	54,972 Bulk & 4,850 Dms	30,000 - 60,000 gal/month	6/14/95	Safety-Kleen Clarksville, MO Fuel Recovery
Spent Solvent	2 Parts washers 1 Immersion cleaning unit	analyzed	D001 D018 D039	Y	Y	G F	G F	G F	0	Approx. 30-40 gallons quartely	4/17/95	Safety-Kleen Dolton, IL Reclamation/Recycling
Hazardous Waste Solids	From spills, cleanings and processing filters		F001, F002 D001-D00X	Y	Y	G F	G F	G F	64 55 gal Drums	Approx. 15-20 55 gal drums monthly	3/2/95	Safety-Kleen Hebron, IL Fuel blending
Remanifasted Waste	Errors & Temp. storage		F002,F003 D001 D002 D027	Y	Y	G F	G F	G F	0	Approx. 1TT every 10-14 days	7/5/95	WIT East Liverpool, OH Fuel Recovery
RQ Waste Flam. Liquid	Process Water		F001	Y	Y	G F	G F	G F	5,298 gallons	Approx. 1TT every 2 weeks	6/30/95	Safety-Kleen Smithfield, Kentucky Fuel blending
						G F	G F	G F				
						G F	G F	G F				
						G F	G F	G F				
						G F	G F	G F				
						G F	G F	G F				

*All responses must be explained in narrative

RCRA Part B Inspection Site # 0316000053

Section I: Containers

	Compliance	
A. Hazardous Waste Management Units	(YES)	NO
B. Waste Identification	(YES)	NO
C. Condition of Containers	(YES)	NO
D. Compatibility of Containers	(YES)	NO
E. Management of Containers	(YES)	NO
F. Inspections	(YES)	NO
G. Containment	(YES)	NO
H. Ignitable or Reactive Wastes	(YES)	NO
I. Special Requirements for Incompatible Wastes	(YES)	NO
J. General Operating Requirements	(YES)	NO
K. Closure Requirements	(YES)	NO

Description of violation: _____

_____

_____

_____

_____

_____

Section II: Tank Systems

	Compliance	
B. Waste Identification	(YES)	NO
C. Containment and Detection of Releases	(YES)	NO
D. General Construction Requirements	(YES)	NO
E. General Operating Requirements	(YES)	NO
F. Tank System Certification	(YES)	NO
G. Response to Leaks or Spills	(YES)	NO

Section II: Tank Systems (continued)

	Compliance	
H. Inspections	(YES)	NO
I. Reporting and Recordkeeping	(YES)	NO
J. Ignitable and Reactive Wastes	(YES)	NO
K. Special Requirements for Incompatible Wastes	(YES)	NO
L. Closure	(YES)	NO

Description of violations: _____

Section III: Reporting and Notification Requirements

	Compliance	
Containers	(YES)	NO
Tank Systems	(YES)	NO
Corrective Action	(YES)	NO
Standard Conditions	(YES)	NO
Additional Special Conditions	(YES)	NO

Description of violations: _____

Section IV: Corrective Action

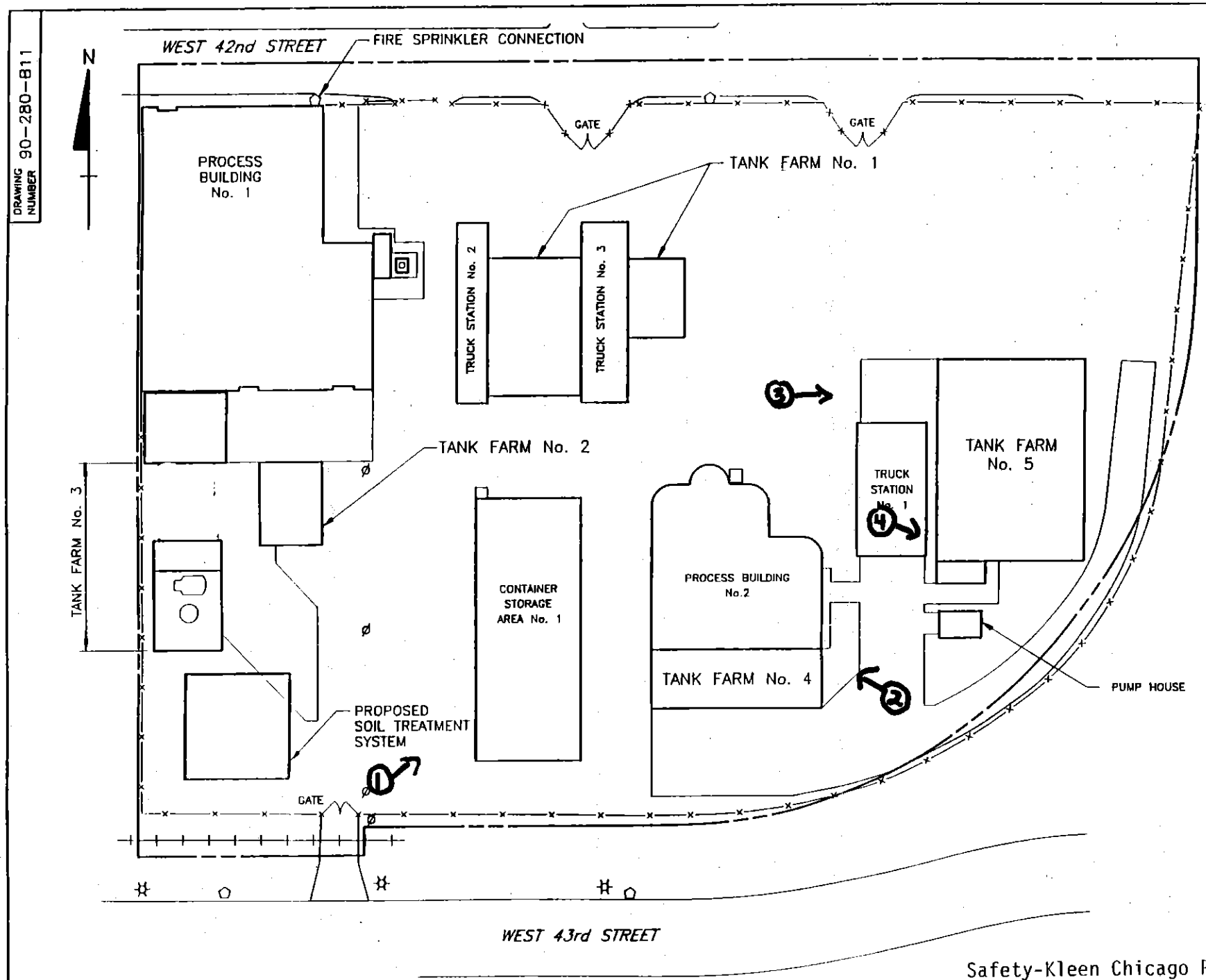
	Compliance	
E. Financial Assurance for Corrective Action	(YES)	NO
F. Notification Requirements for and Assessment of Newly-Identified Solid Waste Management Unit(s)	(YES)	NO
G. Future Releases from SWMUs	(YES)	NO
H. Completion of Corrective Action	(YES)	NO

Description of violations: _____

Section V: Standard Conditions

	Compliance	
A. General Requirements	(YES)	NO
B. General Facility Standards	(YES)	NO
C. Preparedness and Prevention	(YES)	NO
D. Contingency Plan	(YES)	NO
E. Manifest System, Recordkeeping and Reporting	(YES)	NO
F. Closure	(YES)	NO
G. Land Disposal Restrictions	(YES)	NO

Description of violations: _____



A	4-7-91	ISSUED TO CLIENT AND AGENCY	SAK	PWL
REV		ISSUE / REVISION	DWN. BY	CK'D BY / APP'D BY

REFERENCES:
- SAFETY KLEEN CORP., ELGIN ILLINOIS, DRAWING 88-62000-00, DATED 1987 REVISION 0.

Safety-Kleen Chicago RC
0316000053

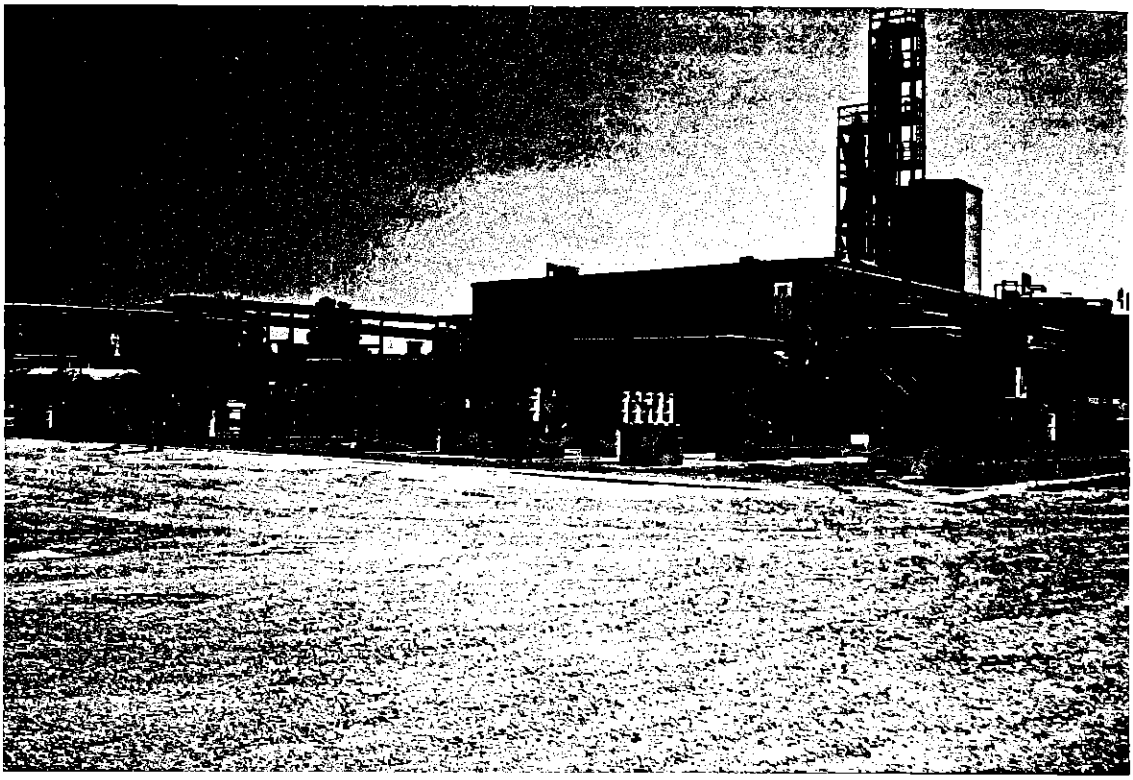
July 11, 1995

Photos (

Illinois Environmental Protection Agency Photographs

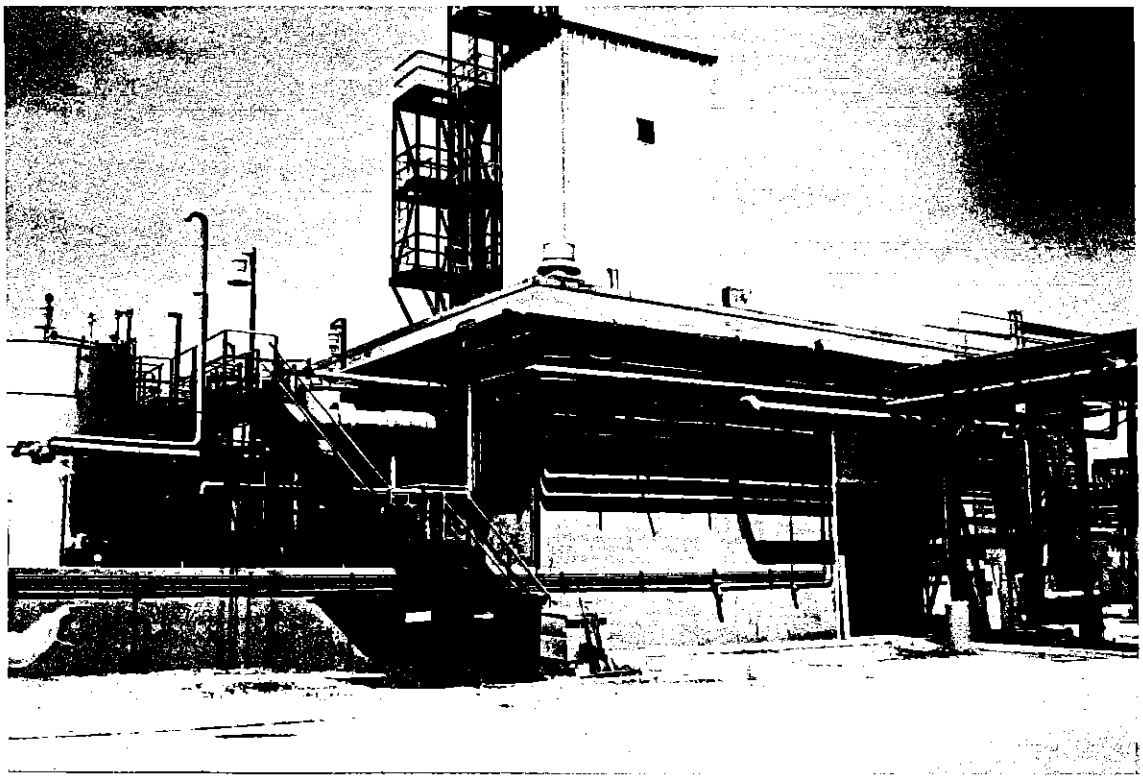
Site Name: Safety-Kleen Corp., Chicago RC IEPA#: 0316000053

Date: July 11, 1995 Time: 9:00A - 12:00N Photograph By: Anna Van Orden



Comments: Facing northeast - Container storage Area # 1

Roll #: 96-008 Photo#: 1



Comments: Facing northwest - Tank Farm #4 and Process Building #2

Roll #: 96-008 Photo# 2

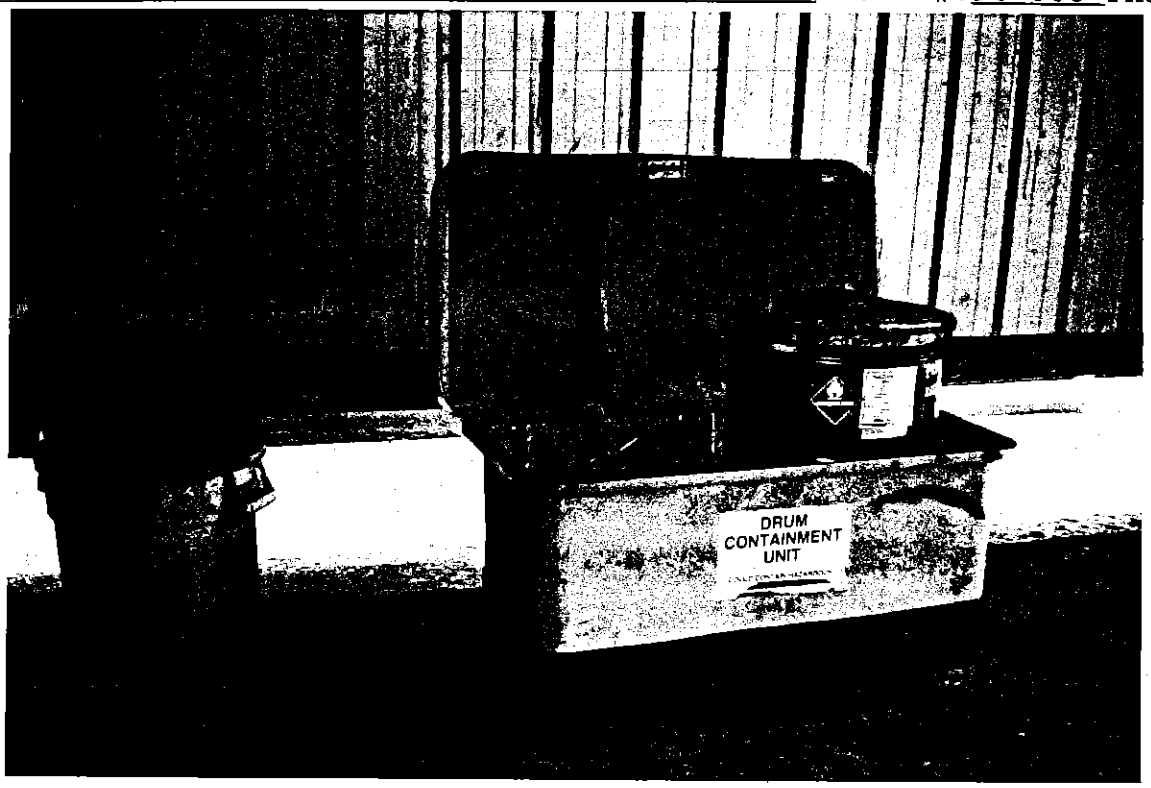
Illinois Environmental Protection Agency Photographs

Site Name: Safety-Kleen Corp., Chicago RC IEPA#: 0316000053

Date: July 11, 1995 Time: 9:00A - 12:00N Photograph By: Anna Van Orden

Comments: Facing east - Tank Farm #5 and Truck station #1

Roll #: 96-008 Photo#: 3



Comments: Facing southeast - Satellite accumulation area in Truck station #1.

Roll #: 96-008 Photo# 4

SAFETY-KLEEN 0316000053

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
	Part 722: Standards Applicable to Generators of Hazardous Waste (>1000 Kg/mo.)	
	Subpart A: General	
	Section 722.111: Hazardous Waste Determination	
722.111	Has the generator correctly determined if the solid waste(s) it generates is a hazardous waste? Yes ✓ No____ N/A____	722.111
	Have hazardous wastes been identified for purposes of compliance with Part 728? Yes ✓ No____ N/A____	
808.121(a)	Has the generator correctly determined if the solid waste(s) it generates is a special waste? Yes ✓ No____ N/A____	808.121(a)
	Section 722.112: USEPA Identification Numbers	
722.112(a)	Has the generator obtained a USEPA identification number? Yes ✓ No____ N/A____	722.112(a)
722.112(c)	Has the generator offered its hazardous waste only to transporters or to treatment, storage or disposal facilities that have a USEPA identification number? Yes ✓ No____ N/A____	722.112(c)
	Subpart B: The Manifest	
	Section 722.120: General Requirements	
722.120(a)	Does the facility manifest its waste off-site? Yes ✓ No____ N/A____	722.120(a)
722.120(b)	Does the manifest designate a facility permitted to handle the waste? Yes ✓ No____ N/A____	722.120(b)
722.120(d)	Has the generator shipped any waste that could not be delivered to the designated facility? Yes____ No ✓ N/A____	722.120(d)
	Section 722.121: Acquisition of Manifests	
	Has the generator used:	
722.121(a)	– an Illinois manifest for wastes designated to a facility within Illinois? Yes ✓ No____ N/A____	722.121(a)
722.121(b)	– a manifest from the State to which the manifest is designated? Yes ✓ No____ N/A____	722.121(b)
	– an Illinois manifest if the State to which the waste is designated has no manifest of its own? Yes____ No____ N/A ✓	
	Section 722.122: Number of Copies	
722.122	Does the manifest consist of at least 6 copies? Yes ✓ No____ N/A____	722.122
	Section 722.123: Use of the Manifest	
	For each manifest reviewed, has the generator:	
722.123(a)	– signed the certificate by hand? Yes ✓ No____ N/A____	722.123(a)
	– obtained the handwritten signature and the date of acceptance by the initial transporter? Yes ✓ No____ N/A____	
	– retained one copy as required by Section 722.140(a)? Yes ✓ No____ N/A____	
	– apparently sent a copy (part 5 for the Illinois manifest) to the Agency within 2 working days? Yes ✓ No____ N/A____	
722.123(b)	– has the generator apparently given the remaining copies to the transporter? Yes ✓ No____ N/A____	722.123(b)

RECEIVED
AUG 0 3 1995
IEPA-DLPC

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
722.123(c)	– has the generator followed the procedures prescribed in Section 722.123 for manifesting bulk shipments of hazardous waste by rail or water? Yes____ No____ N/A✓	722.123(c)
	Subpart C: Pre–Transport Requirements	
	Is there any hazardous waste ready for transport off–site? Yes____ No✓ N/A____	
	If so, is the generator complying with the pre–transport requirements in Subpart C? Yes____ No____ N/A____	
	Section 722.134: Accumulation Time	
722.134(a)	Has the generator complied with the following requirements: Yes✓ No____ N/A____	722.134(a)
722.134(a)(1)	A) For waste in containers, has the generator complied with the requirements of Part 725, Subpart I? Yes✓ No____ N/A____	
	and/or B) For waste in tanks, has the generator complied with the requirements of Part 725, Subpart J (except Sections 725.297(c) and 725.300)? Yes✓ No____ N/A____	
	and/or C) For waste on drip pads, has the generator complied with the requirements of Part 725, Subpart W and maintained the required records identified in this subsection? Yes____ No____ N/A✓	
	and/or D) For waste in containment buildings, has the generator complied with Part 725, Subpart DD and maintained the required records identified in this subsection? Yes____ No____ N/A✓	
722.134(a)(2)	For waste in containers, has the generator marked and made visible for inspection on each container, the date upon which accumulation began? Yes✓ No____ N/A____	
722.134(a)(3)	For waste in containers and tanks, has the generator marked or labeled each with the words "Hazardous Waste"? Yes✓ No____ N/A____	
722.134(a)(4)	Has the generator complied with the requirements of Part 725, Subparts C and D, and Sections 725.116 and 726.107(a)(4)? Yes✓ No____ N/A____	
	Specifically, the requirements of items 1 and/or 4 above (listed by regulation) which need to be complied with are as follows:	
	Does the facility accumulate hazardous waste in **containers?** Yes✓ No____ N/A____	
	If "No", go to Subpart J.	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
722.141(b)	Has the generator who treats, stores or disposes of hazardous waste on-site, filed an annual report with the Agency by March 1 for the preceding calendar year? Yes ✓ No____ N/A____	722.141(b)
	Section 722.142: Exception Reporting	
722.142(a)(1)	If the generator has not received a copy of the manifest from the TSD facility within 35 days of the date of delivery to the transporter, has the generator contacted the transporter or the TSD facility to determine the status of the hazardous waste? Yes____ No____ N/A ✓	722.142(a)(1)
722.142(a)(2)	If the generator has not received a copy of the signed manifest within 45 days of the date of delivery to the transporter, has he filed an exception report with the Agency in accordance with the requirements of this Section? Yes____ No____ N/A ✓	722.142(a)(2)
	Section 722.143: Additional Reporting	
722.143	Has the generator furnished additional reports as required by the Director? Yes____ No____ N/A ✓	722.143
	Subpart E: Exports of Hazardous Waste	
	Is the generator an exporter of hazardous waste? Yes____ No____ N/A ✓	
	If "Yes", has the generator complied with the requirements of Subpart E? Yes____ No____ N/A ✓	
	Subpart F: Imports of Hazardous Waste	
	Is the generator an importer of hazardous waste? Yes____ No____ N/A ✓	
	If "Yes", has the generator complied with the requirements of Subpart F? Yes____ No____ N/A ✓	
	Subpart G: Farmers	
	Is the generator a farmer? Yes____ No____ N/A ✓	
	If "Yes", has the generator complied with the requirements of Subpart G? Yes____ No____ N/A ✓	
	Comments:	

Section 728.107: Waste Analysis and Recordkeeping

(728.107a4) Has the generator who treats a prohibited waste in tanks or containers in order to meet the treatment standards developed and followed a waste analysis plan?
Yes ✓ No____ N/A____

Is the plan on-site?
Yes ✓ No____ N/A____

Does the plan include a detailed physical and chemical analysis?
Yes ✓ No____ N/A____

Has the plan been filed with the Agency at least 30 days prior to commencement of treatment activity?
Yes ✓ No____ N/A____

Has the generator submitted the required notification and certification that the waste meets treatment standards when the waste is shipped off-site?
Yes ✓ No____ N/A____

Subsection 722.134(c): Satellite Accumulation

722.134(c) Is the generator who accumulates hazardous waste at or near any point of generation where wastes initially accumulate and which is under the control of the operator of the process generating the waste limiting such accumulation to 55 gallons of hazardous waste or 1 quart of **acutely** hazardous waste marking the containers with the words "Hazardous Waste" or other words identifying the contents? 722.134(c)
Yes ✓ No____ N/A____

Has the generator who accumulates more than 55 gallons of hazardous waste or 1 quart of **acutely** hazardous waste complied with the requirements of Section 722.134(a) within 3 working days?
Yes____ No____ N/A ✓

If there are more than 55 gallons of hazardous waste or 1 quart of **acutely** hazardous waste in the satellite accumulation area, are the containers marked with the date accumulation began?
Yes____ No____ N/A ✓

During the 3 day period, is the generator continuing to comply with the requirements of Section 722.134(c)(1) with respect to the excess waste?
Yes____ No____ N/A ✓

Subpart D: Recordkeeping and Reporting

Section 722.140: Recordkeeping

722.140(a) Has the generator retained for a period of 3 years: 722.140(a)
- a copy of each signed manifest?

Yes ✓ No____ N/A____

722.140(b) Has the generator retained a copy of each Annual Report and Exception Report for a period of at least three years from the due date of the report (March 1)? 722.140(b)
Yes ✓ No____ N/A____

722.140(c) Has the generator retained for a period of 3 years: 722.140(c)
- copies of test results, waste analyses or other determinations made in accordance with Section 722.111?

Yes ✓ No____ N/A____

722.140(d) Does a generator who is involved in any unresolved enforcement action or as requested by the Director continue to maintain the records required in subsections a) and c)? 722.140(d)
Yes____ No____ N/A ✓

Section: 722.141: Annual Reporting

722.141(a) Has the generator who ships hazardous waste off-site for treatment, storage or disposal filed an annual report with the Agency by March 1 for the preceding calendar year? 722.141(a)
Yes ✓ No____ N/A____

Note: If "No", or if deficiencies are noted with the annual report reviewed, contact the Planning and Reporting Section.

Subpart J: Tank Systems

Has the generator closed an accumulation area?

Yes____ No____ N/A___✓

(725.211) (725.214) If "Yes", was the accumulation area closed in accordance with Sections 725.211 and 725.214?

Yes____ No____ N/A___✓

(725.290) Does the facility accumulate or treat hazardous waste in tanks?

Yes___✓ No____ N/A____

Note: A generator may treat hazardous waste in a tank for less than 90 days without a RCRA permit.

If "No", skip Subpart J.

a) Tank systems that are used to accumulate or treat hazardous waste which contains no free liquids (using the Paint Filter Liquids Test) and that are situated inside a building with an impermeable floor are exempted from the requirements in Section 725.293.

b) Tank systems, including sumps, that serve as part of a secondary containment sytem to collect or contain releases of hazardous wastes are exempted from the requirements in Section 725.293(a).

c) Tanks, sumps and other collection devices used in conjunction with drip pads (as defined in Section 720.110) and regulated under Subpart W, must meet the requirements of this Subpart.

(725.291a) For tanks **existing** prior to July 14, 1986 (see definition of tank system under 720.110)and not protected by a secondary containment system, has a written assessment been reviewed and certified by an IRPE(*) in accordance with Section 702.126(d) by January 12, 1988 [except as provided in Section 725.291(c)]?

Yes____ No____ N/A___✓

(725.291b) Does this assessment consider at least the following:

1) design standards for the tank and ancillary equipment?

Yes____ No____ N/A___✓

2) hazardous characteristics of the wastes?

Yes____ No____ N/A___✓

3) existing corrosion protection measures?

Yes____ No____ N/A___✓

4) documented age of the tank system?

Yes____ No____ N/A___✓

5) results of a leak test, internal inspection, or other tank integrity examination?

Yes____ No____ N/A___✓

(725.291c) Has a tank system assessment been performed within 12 months after the materials in the tank become a hazardous waste?

Yes___✓ No____ N/A____

Note: If an assessment indicates a tank system is leaking or unfit for use, the owner/operator must comply with the requirements of Section 725.291(b)(5).

(725.292a) For **new** tanks (see definition of new tanks under Section 720.110) whose installation commenced after 7/14/86, has a written assessment been reviewed and certified by an IRPE in accordance with Section 702.126(d) prior to operation of the tank system?

Yes___✓ No____ N/A____

Does the assessment include, at a minimum, the following:

1) design standards for tanks and ancillary equipment?

Yes___✓ No____ N/A____

2) hazardous characteristics of the waste(s) to be handled?

Yes___✓ No____ N/A____

3) evaluation of potential for corrosion and corrosion protection measures for tank systems with metal components in contact with soil or water?

Yes___✓ No____ N/A____

*IRPE = Independent Registered Professional Engineer

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
	4) design or operational measures that will protect underground tank systems from potential damage resulting from vehicular traffic? Yes____ No____ N/A✓	
	5) designs to ensure adequate foundations, anchoring to prevent flotation or dislodgement and the ability to withstand the effects of frost heave? Yes____ No____ N/A✓	
(725.292g)	Has the owner/operator obtained and kept on file at the facility the written statements, including the certification statements [as required in Section 702.126(d)] of the design and installation requirements of Subsections (b) through (f)? Yes✓ No____ N/A____	
(725.293a)	Is **secondary containment** provided for any new tank system before being put into service? Yes✓ No____ N/A____	
	Does an existing tank, used to accumulate F020, F021, F022, F023, F026 or F027 waste(s), have secondary containment by 1/12/89? Yes____ No____ N/A✓	
	For an existing tank of documentable age, is secondary containment provided by 1/12/89 or when the tank is 15 years old, whichever is later? Yes✓ No____ N/A____	
	For an existing tank of undocumentable age, has secondary containment been provided by 1/12/95? Yes✓ No____ N/A____	
	or if the facility is older than 7 years, by the time the facility reaches 15 years of age or 1/12/89, whichever is later? Yes✓ No____ N/A____	
	For tanks that accumulate wastes that become hazardous after 1/12/87, has secondary containment been provided within the time intervals required in Subsections (a)(1) through (a)(4) substituting the date that a material becomes a hazardous waste for 1/12/87? Yes✓ No____ N/A____	
(725.293b)	Is the secondary containment system designed, installed and operated to prevent migration of wastes or accumulated liquid out of the system at any time? Yes✓ No____ N/A____	
	Is the secondary containment system capable of detecting and collecting releases and accumulated liquids until the collected material is removed? Yes✓ No____ N/A____	
(725.293c)	To meet the requirements of Subsection (b), is the secondary containment system:	
	1) compatible with the waste(s) in the tank and of sufficient strength and thickness to prevent failure? Yes✓ No____ N/A____	
	2) placed on a foundation or base capable of providing support, providing resistance to pressure gradients and preventing failure due to settlement, compression of uplift? Yes✓ No____ N/A____	
	3) provided with a leak detection system designed and operated to detect any release or accumulated liquid within 24 hours? Yes✓ No____ N/A____	
	4) sloped or otherwise designed or operated to drain and remove liquids resulting from leaks, spills or precipitation? Yes✓ No____ N/A____	
	and is spilled or leaked waste and accumulated precipitation removed from the secondary containment within 24 hours? Yes✓ No____ N/A____	
	Note: A RCRA permit may allow for removal of liquids less frequently than 24 hours after accumulation.	

Regulation		Violation
(725.293d)	Does the secondary containment for tanks have one or more of the following: 1) a liner (external to the tank); or 2) a vault; or 3) a double–walled tank; or 4) an equivalent device (approved by the Board)? Yes ✓ No____ N/A____	
(725.293e)	Does the external liner system(s), vault system(s) and/or double–walled tank(s) meet the additional requirements identified in Section 725.293(e)? Yes ✓ No____ N/A____	
(725.293f)	Is ancillary equipment protected by secondary containment that meets the requirement of Subsection (h) and (c)? Yes ✓ No____ N/A____ If "No": 1) Is aboveground piping (exclusive of flanges, joints, valves and connections) inspected daily? Yes ✓ No____ N/A____ 2) Are welded flanges, joints and connections inspected daily? Yes ✓ No____ N/A____ 3) Are sealless or magnetic coupling pumps and sealless valves inspected daily? Yes ✓ No____ N/A____ 4) Are pressurized aboveground piping systems with automatic shut–off devices inspected daily? Yes ✓ No____ N/A____	
(725.293i)	Until such time as secondary containment is provided, are the following requirements being met for all tank systems: 1) For non–enterable underground tanks, has an annual leak test that meets the requirements of 725.291(b)(5) been conducted? Yes____ No____ N/A ✓ 2) For other than non–enterable underground tanks and ancillary equipment, has an annual leak test, internal inspection or other tank integrity examination by an IRPE been conducted? Yes____ No____ N/A ✓ 3) Are written records maintained at the facility to document the assessments required under Subsections (i)(1) and (i)(2)? Yes____ No____ N/A ✓ **Note:** If a tank system is found to be leaking or unfit for use as a result of a leak test or assessment, the owner/operator must comply with Section 725.296.	
(725.294a)	Has the owner/operator placed hazardous wastes or treatment reagents in the tank system that could cause the system to rupture, leak, corrode or otherwise fail? Yes____ No ✓ N/A____	
(725.294b)	Do tanks and secondary containment have appropriate controls and practices to prevent spills and overflows including: 1) spill prevention controls? Yes ✓ No____ N/A____ 2) overfill prevention controls? Yes ✓ No____ N/A____ 3) sufficient freeboard in uncovered tanks? Yes____ No____ N/A ✓	
(725.294c)	**Note:** If a leak or spill has occurred in the tank system, the owner/operator shall comply with the requirements of Section 725.296.	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.295a)	Does the owner/operator inspect, if present, at least each operating day, the following:	
	1) overfill/spill control equipment? Yes ✓ No____ N/A____	
	2) the aboveground portion of the tank system for corrosion or releases? Yes ✓ No____ N/A____	
	3) data from monitoring equipment? Yes ✓ No____ N/A____	
	4) the construction materials and the area immediately surrounding the external portion of the system? Yes ✓ No____ N/A____	
(725.295b)	If the tank system has cathodic protection, is the owner/operator complying with Section 725.295(b) to ensure that they are functioning properly? Yes ✓ No____ N/A____	
(725.295c)	Does the owner/operator document in the operating record, the results of tank inspections as required in Section 725.295(a) and (b)? Yes ✓ No____ N/A____	
(725.296)	If the tank system or secondary containment system has a leak or spill or is unfit for use, has the owner/operator:	
	a) immediately ceased using; prevented flow or addition of waste and inspected the system to determine the cause of the release? Yes____ No____ N/A ✓	
	b) removed applicable waste from the system within 24 hours of detection? Yes____ No____ N/A ✓	
	c) immediately conducted a visual inspection of the release and taken actions to contain visible releases to the environment, prevented further migration to soils or surface water and removed and properly disposed of any contaminated soil or water? Yes____ No____ N/A ✓	
(725.296d)	d) notified the Agency within 24 hours of detection of release? Yes____ No____ N/A ✓	
	d)3) within 30 days of detection of release, submitted a report to the Agency that complies with the requirements of Section 725.296(d)(3)? Yes____ No____ N/A ✓	
	Note: Notification and reports are not necessary if less than 1 pound of material is spilled and it was immediatey contained and cleaned up.	
(725.296e)	e) repaired the tank system prior to returning the tank system to service in the event that a leak has occurred from the primary tank system into the secondary containment system? Yes____ No____ N/A ✓	
	e)4) provided secondary containment before returning a tank system to service in the event that the release was from a component of a tank system without secondary containment? Yes____ No____ N/A ✓	
	e)4) met the requirements for a new tank system in the event that a component is replaced during repair? Yes____ No____ N/A ✓	
	e)4) provided the entire component with secondary containment prior to being returned to use in the event that a leak has occurred in any portion of a component that is not readily accessible for visual inspection? Yes____ No____ N/A ✓	
(725.296f)	f) In the event that an extensive repair has been conducted in accordance with subsection (e), submitted to the Agency within 7 days after returning the tank system to use, a certification by an IRPE stating that the repaired system is capable of handling hazardous wastes without release for the intended life of the system? Yes____ No____ N/A ✓	

Subpart I: Use and Management of Containers

Has the generator closed an accumulation area?
Yes____ No____ N/A ✓

(725.211) (725.214) If "Yes", was the accumulation area closed in accordance with Sections 725.211 and 725.214?
Yes____ No____ N/A ✓

(725.271) If the containers have leaked or are in poor condition, has the owner/operator transferred the hazardous waste to a suitable container?
Yes____ No____ N/A ✓

(725.272) Is the waste compatible with the container and/or liner?
Yes ✓ No____ N/A____

(725.273a) Are containers of hazardous waste always closed except to remove or add waste during accumulation?
Yes ✓ No____ N/A____

(725.273b) Are containers of hazardous waste being opened, handled, or stored in a manner which will prevent the rupture of the container or prevent it from leaking?
Yes ✓ No____ N/A____

(725.274) Is the owner/operator inspecting the accumulation area(s) at least weekly, looking for leaks or deterioration?
Yes ✓ No____ N/A____

Is the accumulation area free from any evidence of leaking or deteriorating containers? (See also Section 725.131)
Yes ✓ No____ N/A____

(725.276) Are containers holding ignitable or reactive wastes located at least 15 meters (50 feet) from the facility's property line?
Yes ✓ No____ N/A____

Note: See Section 725.117(a) for additional requirements for ignitable, reactive or incompatible wastes.

(725.277) Is the owner/operator complying with the requirements concerning incompatible wastes?
Yes ✓ No____ N/A____

Comments:

Does the generator accumulate and/or treat hazardous waste in tanks?
Yes ✓ No____ N/A____

Note: If "No", go to Subpart C.

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
	Subpart C: Preparedness and Prevention	
(725.131)	Is the facility being operated and maintained to minimize the possibility of a fire, explosion or any release of hazardous waste or hazardous waste constituents which could threaten human health or the environment? Yes ✓ No____ N/A____	
(725.132)	Is the facility equipped with the following, if necessary: a) an internal communication or alarm system(s)? Yes ✓ No____ N/A____ b) a telephone or other device to summon emergency assistance from local authorities? Yes ✓ No____ N/A____ c) portable fire extinguishers, fire control equipment, spill control equipment and decontamination equipment? Yes ✓ No____ N/A____ d) water at adequate volume and pressure for fire control? Yes ✓ No____ N/A____	
(725.133)	Is the facility testing and maintaining communication/alarm system(s), fire protection equipment, spill control equipment and decontamination equipment? Yes ✓ No____ N/A____	
(725.134)	a) Where hazardous waste is being handled, do all employees have immediate access to an internal alarm or other emergency communication device? Yes ✓ No____ N/A____ b) If there is ever just one employee on the premises when the facility is operating, does he/she have immediate access to a device capable of summoning external emergency assistance? Yes____ No____ N/A ✓	
(725.135)	Is the facility maintaining adequate aisle space? Yes ✓ No____ N/A____	
(725.137)	Has the facility attempted to make the following arrangements, as appropriate, for the type of facility and waste: – arrangements with local emergency authorities (i.e. police and fire departments, other emergency response agencies) to familiarize them with the layout of the facility, properties of hazardous waste handled, places where facility personnel would be working, entrances to roads inside the facility and evacuation routes? Yes ✓ No____ N/A____ – agreements designating the primary authority where more than one police or fire department might respond? Yes ✓ No____ N/A____ – agreements with State emergency response teams, contractors and equipment suppliers? Yes ✓ No____ N/A____ – arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the type of injuries or illnesses which could result from fires, explosions or releases at the facility? Yes ✓ No____ N/A____	
	Subpart D: Contingency Plan and Emergency Procedures	
(725.151a)	Is the contingency plan available? Yes ✓ No____ N/A____ If "No", skip to Section 725.155. Is the plan designed to protect human health and the environment from releases to the air, soil and water? Yes ✓ No____ N/A____	
(725.151b)	Has there been a fire, explosion or release of hazardous waste? Yes____ No____ N/A ✓ If "Yes", has the contingency plan been carried out immediately? Yes____ No____ N/A ✓	

(725.152a) Does the plan describe the actions required for response to:

- fires? Yes ✓ No____ N/A____
- explosions? Yes ✓ No____ N/A____
- releases? Yes ✓ No____ N/A____

(725.152c) Does the plan describe arrangements with:

- police and fire departments? Yes ✓ No____ N/A____
- hospitals? Yes ✓ No____ N/A____
- contractors? Yes ✓ No____ N/A____
- emergency response teams? Yes ✓ No____ N/A____

(725.152d) Does the plan contain the current emergency coordinator's name, phone (office and home) and address?

Yes ✓ No____ N/A____

(725.152e) Does the plan identify all emergency equipment including:

- description? Yes ✓ No____ N/A____
- capability? Yes ✓ No____ N/A____
- location? Yes ✓ No____ N/A____

Is the list of emergency equipment up-to-date?

Yes ✓ No____ N/A____

(725.152f) Does the plan include:

- an evacuation plan? Yes ✓ No____ N/A____
- an evacuation signal? Yes ✓ No____ N/A____
- alternate evacuation routes? Yes ✓ No____ N/A____

(725.153) Has the contingency plan (including all revisions) been:

a) maintained at the facility? Yes ✓ No____ N/A____

b) submitted to:

- police department? Yes ✓ No____ N/A____
- fire department? Yes ✓ No____ N/A____
- hospital? Yes ✓ No____ N/A____
- emergency response teams? Yes ✓ No____ N/A____

(725.154) Has the contingency plan been reviewed and revised whenever:

a) regulations are revised? Yes ✓ No____ N/A____

b) the plan fails in an emergency? Yes____ No____ N/A ✓

c) the facility changes in a way that modifies the emergency response necessary?

Yes ✓ No____ N/A____

d) information regarding emergency coordinators changes?

Yes ✓ No____ N/A____

e) information regarding equipment changes?

Yes ✓ No____ N/A____

(725.155) Is the emergency coordinator on-site or on call at all times?

Yes ✓ No____ N/A____

Is the emergency coordinator familiar with all facility activities, wastes, records, layout and contingency plan?

Yes ✓ No____ N/A____

Does the emergency coordinator have the authority to commit the resources needed to carry out the actions specified in the contingency plan?

Yes ✓ No____ N/A____

(725.156) If the facility has had a release, fire or explosion, have the procedures of this Section been followed regarding assessment, response and reporting?

Yes____ No____ N/A ✓

Note: If the facility has had a release, explain in detail.

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
	Section 725.116: Personnel Training	
(725.116a)	Does the facility have a training program? Yes ✓ No____ N/A____	
	Have facility personnel 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 Part 725? Yes ✓ No____ N/A____	
	Is the program directed by a person trained in hazardous waste management procedures? Yes ✓ No____ N/A____	
	Does the program teach facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to the positions in which they are employed? Yes ✓ No____ N/A____	
	Does the program cover, at a minimum:	
	– procedures to familiarize facility personnel with emergency procedures, emergency equipment and emergency systems? Yes ✓ No____ N/A____	
	– procedures for using, inspecting, repairing and replacing facility emergency and monitoring equipment? Yes ✓ No____ N/A____	
	– key parameters for automatic waste feed cut-off systems? Yes ✓ No____ N/A____	
	– communications or alarm systems? Yes ✓ No____ N/A____	
	– response to fire or explosions? Yes ✓ No____ N/A____	
	– response to groundwater contamination incidents? Yes ✓ No____ N/A____	
	– shutdown of operations? Yes ✓ No____ N/A____	
(725.116b)	Have new employees completed the program within 6 months of the date of employment or assignment to a position requiring them to manage hazardous waste? Yes ✓ No____ N/A____	
(725.116c)	Have facility personnel received an annual review of the initial training? Yes ✓ No____ N/A____	
(725.116d)	Are the following documents and records being maintained at the facility:	
	1) the job title for each position related to hazardous waste management and the name(s) of the employee(s) filling each job? Yes ✓ No____ N/A____	
	2) a written job description for each position above, including the requisite skill, education or other qualifications and duties of personnel assigned to each position? Yes ✓ No____ N/A____	
	3) a written description of the type and amount of both initial and continuing training that will be given to each person filling a position dealing with hazardous waste management? Yes ✓ No____ N/A____	
	4) records documenting that the training or job experience has been given to and completed by facility personnel? Yes ✓ No____ N/A____	
(725.116e)	Is the facility maintaining training records until closure of the facility and those of former employees for at least 3 years from the last date of employment? Yes ✓ No____ N/A____	

Note: If the owner/operator does not satisfy the requirements of subsections (e)(2) through (e)(4), the tank system must be closed in accordance with Section 725.297.

(725.297a) At the time of closure of a tank system, has the owner/operator removed or decontaminated all waste residues, contaminated components, contaminated soils and structures and equipment and managed them as hazardous waste (unless Section 721.103(d) applies)?

Yes____ No____ N/A ✓

(725.297a) Have the closure plan, closure activities, cost estimates for closure and financial responsibility for tank systems met all requirements specified in Subparts G and H?

Yes ✓ No____ N/A____

(725.297b) If the tank system cannot be "clean" closed, has the owner/operator closed the tank system and performed post–closure care in accordance with the closure and post–closure care requirements that apply to landfills (Section 725.410)?

Yes____ No____ N/A ✓

Note: Such a tank system is considered a landfill and must meet all of the requirements of landfills specified in Subparts G and H.

(725.298a) Are ignitable or reactive wastes placed in a tank system?

Yes ✓ No____ N/A____

If "No", skip to Section 725.299.

Is the waste treated, rendered or mixed before or immediately after placement in the tank system so that:

– the resulting waste, mixture or dissolved material is no longer ignitable or reactive?

Yes____ No____ N/A ✓

– Section 725.117(b) is complied with?

Yes ✓ No____ N/A____

or

Is the waste accumulated or treated so that it is protected from any material or conditions which may lead to ignition or reaction?

Yes ✓ No____ N/A____

or

Is the tank used solely for emergencies?

Yes____ No____ N/A ✓

(725.298b) Is the facility complying with the requirements regarding maintenance of protective distances between the waste management area and any public ways, streets, alleys or any adjoining property line?

Yes ✓ No____ N/A____

(725.299) Are incompatible wastes/materials placed in the same tank?

Yes____ No ✓ N/A____

If "No", skip to Section 725.300.

Is Section 725.117(b) being complied with?

Yes____ No____ N/A ✓

Has the tank system been properly decontaminated if it previously held an incompatible waste/material unless Section 725.117(b) is complied with?

Yes____ No____ N/A ✓

COMMENTS:

Regulation	RCRA LDR INSPECTION CHECKLIST (PART 728)	Violation
	Part 728: Land Disposal Restrictions	
	Subpart A: General	
	Section 728.103: Dilution Prohibited as a Substitute for Treatment	
728.103(a)	**Has a person diluted a restricted waste or a treatment residual of a restricted waste as a substitute for adequate treatment?** Yes____ No____ N/A ✓	728.103(a)
	Note: Has any person filed for a petition to allow land disposal of wastes prohibited under Subpart C of Part 728? Yes____ No____ N/A ✓	
	Section 728.104: Treatment Surface Impoundment Exemption	
728.104	Are wastes that are otherwise prohibited from land disposal under this Part being treated in a surface impoundment that meets the requirements of this Section? Yes____ No____ N/A ✓	728.104
	Section 728.107: Waste Analysis and Recordkeeping	
728.107(a)	**Has the generator tested the waste [as specified in 728.107(a)] or used knowledge of the waste to determine if the waste is restricted from land disposal?** Yes ✓ No____ N/A____	728.107(a)
728.107(a)(1)	**If a generator determines that its waste is restricted, has a notice been sent with each shipment that includes the following information:**	728.107(a)(1)
	A) USEPA Hazardous Waste Number? Yes ✓ No____ N/A____	
	B) corresponding treatment standards or a reference to the treatment standard by section or applicable treatment code? Yes ✓ No____ N/A____	
	C) manifest number associated with the shipment of waste? Yes ✓ No____ N/A____	
	D) for hazardous debris, the contaminants subject to treatment as provided by Section 728.145(b) and the following statement: "This hazardous debris is subject to the alternative treatment standards of Section 728.145?" Yes____ No____ N/A ✓	
	E) waste analysis data, where available? Yes ✓ No____ N/A____	
728.107(a)(2)	Has the generator of a restricted waste that meets the applicable treatment standards submitted, with each shipment, a notice and certification, as specified in this Section, stating that the waste meets applicable treatment standards and can be land disposed without further treatment? Yes____ No____ N/A ✓	728.107(a)(2)
728.107(a)(3)	Has the generator of a restricted waste that has been exempted under Section 728.106 submitted a notice, as specified in this section, with each shipment to the receiving facility, stating that the waste is not prohibited from land disposal? Yes____ No____ N/A ✓	728.107(a)(3
728.107(a)(4)	Has the generator who treats a prohibited waste in tanks or containers in order to meet the treatment standards developed and followed a waste analysis plan? Yes ✓ No____ N/A____	728.107(a)(4
	Is the plan on-site? Yes ✓ No____ N/A____	
	Does the plan include a detailed physical and chemical analysis? Yes ✓ No____ N/A____	
	Has the plan been filed with the Agency at least 30 days prior to commencement of the treatment activity? Yes ✓ No____ N/A____	

Regulation	RCRA LDR INSPECTION CHECKLIST (PART 728)	Violation
	Has the generator submitted the required notification and certification that the waste meets treatment standards when the waste is shipped off-site? Yes ✓ No___ N/A___	
728.107(a)(5)	Has the generator who has determined that the waste is restricted based on the generator's knowledge and/or testing of the waste retained all supporting data used to make this determination on-site? Yes ✓ No___ N/A___	728.107(a)(5)
728.107(a)(6)	If a generator determines, subsequent to the time of generation, that the generator is managing a restricted waste which is excluded from the definition of hazardous or solid waste or exempt from RCRA, has a one-time notification stating such generation been placed in the generator's files? Yes___ No___ N/A ✓	728.107(a)(6)
728.107(a)(7)	Does a generator keep on-site a copy of all notices, certifications, demonstrations, waste analysis data and other documentation produced pursuant to this Section for at least five years from the date of the latest shipment? Yes ✓ No___ N/A___	728.107(a)(7
728.107(a)(8)	If a generator is managing a lab pack that contains waste identified in Appendix D of Part 728 and wishes to use the alternative treatment standard under Section 728.142, has the generator submitted a notice and certification to the treatment facility with each shipment in accordance with this subsection? Yes___ No___ N/A ✓	728.107(a)(8
728.107(a)(9)	If a generator is managing a lab pack that contains organic waste identified in Appendix E of Part 728 and wishes to use the alternative treatment standard, has the generator submitted a notice and certification to the treatment facility with each shipment in accordance with this subsection? Yes___ No___ N/A ✓	728.107(a)(9
728.107(a 10)	Has a small-quantity generator with a tolling agreement pursuant to Section 722.120(e) retained on site a copy of the notification and certification of the initial waste shipment together with the tolling agreement for at least 3 years after the termination or expiration of the agreement? Yes___ No___ N/A ✓	728.107(a)(1
728.107(b)	Has the treatment facility tested its waste according to the frequency specified in its waste analysis plan as required by Sections 724.113 or 725.113 and subsections (b)(1), (b)(2) and (b)(3) of this section? Yes ✓ No___ N/A___	728.107(b
728.107(b)(4)	Has the treatment facility sent a notice to the land disposal facility with each shipment of waste that includes the following information: A) USEPA Hazardous Waste Number? Yes___ No___ N/A ✓ B) corresponding treatment standards or a reference to the treatment standard by section or applicable treatment code? Yes___ No___ N/A ✓ C) manifest number associated with the shipment of waste? Yes___ No___ N/A ✓ D) waste analysis data, where available? Yes___ No___ N/A ✓	728.107(b)
728.107(b)(5)	Has the treatment facility submitted a certification, as specified in 728.107(b)(5), with each shipment of hazardous waste or treatment residue to the land disposal facility? Yes___ No___ N/A ✓	728.107(b)
728.107(b)(6)	If the waste or treatment residue will be further managed at a different treatment or storage facility, is the treatment facility sending the waste complying with the notice and certification requirements of Section 728.107(a)? Yes ✓ No___ N/A___	728.107(b)

Regulation		Violation
728.107(b)(7)	Has the recycling facility that is making off–site shipments of recyclable materials used in a manner constituting disposal: – submitted to the Agency a notice and certification with each shipment in accordance with 728.107(b)(4) and (b)(5)? Yes ✓ No___ N/A___ – kept records of the name and location of each entity receiving the hazardous waste–derived product? Yes ✓ No___ N/A___	728.107(b)(7)
728.107(c)	Has the owner/operator of any land disposal facility disposing of any restricted waste, except where the waste being disposed of is a recyclable material used in a manner constituting disposal: 1) maintained copies of the notice and certification specified in subsection 728.107(a) or (b)? Yes___ No___ N/A ✓ 2) tested the waste to ensure that it is in compliance with applicable treatment standards or prohibitions? Yes___ No___ N/A ✓	728.107(c)
728.107(c)(4)	**Note:** If the owner/operator is disposing of any waste that is a recyclable material used in a amanner constituting disposal, the owner/operator is not subject to the subsections (c)(1) and (c)(2) with respect to such waste.	
728.107(d)	Has the generator or treater who first claims that their hazardous debris is excluded from the definition of a hazardous waste under Section 728.103(f)(2) provided the following notification and certification: 1) a one–time notification submitted to the Agency including the following information: A) the name and address of the RCRA Subtitle D facility receiving the treated debris? Yes___ No___ N/A ✓ B) a description of the hazardous debris as initially generated including the applicable USEPA hazardous waste number(s)? Yes___ No___ N/A ✓ C) for debris excluded under Section 728.103(f)(2), the technology from Section 728, Table F? Yes___ No___ N/A ✓ 2) Has the notification been updated if the debris is shipped to a different facility or if a different technology is used to treat the debris? Yes___ No___ N/A ✓ 3) For debris excluded under Section 728.103(f)(2), has the owner/operator of the treatment facility documented and certified compliance with the treatment standards of Section 728, Table F pursuant to this Subsection? Yes___ No___ N/A ✓	728.107(d)
	Section 728.109: Special Rules for Characteristic Wastes	
728.109(a)	Has the generator determined each USEPA hazardous waste code applicable to the waste in order to determine the applicable treatment standards under Subpart D? Yes ✓ No___ N/A___	728.109(a)
	Note: For purposes of this Part, the waste will carry the waste code for any applicable listing under Part 721, Subpart D and one or more of the waste codes under Part 721, Subpart C where the waste exhibits the relevant characteristic, except in the case when the treatment standard for the Subpart D waste code operates in lieu of the standard for the Subpart C waste code as specified in subsection (b).	
728.109(b)	Does the waste meet the treatment standards for all applicable listed and characteristic waste codes? Yes ✓ No___ N/A___	728.109(b)
	Note: Where a prohibited waste is both listed and characteristic, the treatment standard for the listed waste code will operate in lieu of the standard for the characteristic waste code, provided that the treatment standard for the listed waste includes a treatment standard for the constituent that causes the waste to exhibit the characteristic.	

Regulation	RCRA LDR INSPECTION CHECKLIST (PART 728)	Violation
728.109(c)	Has the generator land disposed any prohibited waste which exhibits a characteristic under Part 721, Subpart C only if the waste complies with the treatment standards under Part 728, Subpart D (in addition to any applicable standards determined from the initial point of generation)? Yes____ No____ N/A ✓	728.109(c)
728.109(d)	1) Has the generator sent the required notification and certification to the appropriate Agency for each shipment of waste that no longer exhibits the characteristic to a Subtitle D landfill? Yes____ No____ N/A ✓ Does the notification include the following information: A) name and address of the non–hazardous waste facility receiving the shipment? Yes____ No____ N/A ✓ B) description of the waste as initially generated, including USEPA hazardous waste number(s), applicable wastewater or nonwastewater category and the subdivisions made within a waste code based on waste specific criteria (such as D003, reactive cyanides)? Yes____ No____ N/A ✓ C) treatment standards applicable to the waste at the initial point of generation? Yes____ No____ N/A ✓ 2) Has the certification been signed by an authorized representative and is the language stated as required in Section 728.107(b)(5)(A)? Yes____ No____ N/A ✓	728.109(d)
	Subpart C: Prohibition on Land Disposal	
	Section 728.130: Waste Specific Prohibitions –– Solvent Wastes	
728.130	Has the generator of a spent solvent waste (F001–F005) land disposed the waste only after having: 1) met the treatability standards of Part 728, Subpart D; or Yes____ No____ N/A ✓ 2) been granted an exemption from a prohibition pursuant to a petition under Section 728.106; or Yes____ No____ N/A ✓ 3) been granted an extension to the effective date of prohibition pursuant to Section 728.105? Yes____ No____ N/A ✓	728.130
	Section 728.131: Waste Specific Prohibitions –– Dioxin–Containing Wastes	
728.131	Has the generator of a dioxin–containing waste (F020, F021, F022, F023, F026, F027 or F028) land disposed the waste only after having: 1) met the treatability standards of Part 728, Subpart D; or Yes____ No____ N/A ✓ 2) been granted an exemption from a prohibition pursuant to a petition under Section 728.106; or Yes____ No____ N/A ✓ 3) been granted an extension to the effective date of prohibition pursuant to Section 728.105? Yes____ No____ N/A ✓	728.131
	Section 728.132: Waste Specific Prohibitions –– California List Wastes	
728.132	Has the generator of a California List Waste land disposed the waste only after having: 1) been granted an adjusted standard from a prohibition pursuant to a petition under Section 728.106 (except for liquid hazardous waste containing PCBs at concentrations greater than or equal to 500 ppm which are not elegible for exemptions; or Yes____ No____ N/A ✓ 2) been granted an extension to the effective date of prohibition pursuant to Section 728.105? Yes____ No____ N/A ✓ 3) met the applicable treatment standards specified in Subpart D or, where treatment standards are not specified, the wastes are in compliance with the applicable prohibitions set forth in this Section or Section 728.139? Yes____ No____ N/A ✓	728.132

Regulation	RCRA LDR INSPECTION CHECKLIST (PART 728)	Violation
	Section 728.133: Waste Specific Prohibitions -- First Third Wastes	
28.133	Has the generator of a first third waste land disposed the waste only after having:	
	1) met the treatability standards of Part 728, Subpart D; or Yes____ No____ N/A ✓	728.133
	2) been granted an adjusted standard pursuant to Section 728.106; or Yes____ No____ N/A ✓	
	3) been granted an extension to the effective date of prohibition pursuant to Section 728.105? Yes____ No____ N/A ✓	
728.133(g)	Has the generator of a first third waste tested the waste or used knowledge of the waste to determine whether it exceeds the applicable treatment standards? Yes____ No____ N/A ✓	728.133(g)
	Section 728.134: Waste Specific Prohibitions -- Second Third Wastes	
728.134	Has the generator of a second third waste land disposed the waste only after having:	
	1) met the treatability standards of Part 728, Subpart D; or Yes____ No____ N/A ✓	728.134
	2) been granted an extension to the effective date of prohibition pursuant to Section 728.105; or Yes____ No____ N/A ✓	
	3) been granted an exemption pursuant to Section 728.106? Yes____ No____ N/A ✓	
728.134(i)	Has the generator of a second third hazardous waste tested the waste or used his knowledge of the waste to determine whether it exceeds the applicable treatment standards of 728.141 or 728.143? Yes____ No____ N/A ✓	728.134(i)
	Section 728.135: Waste Specific Prohibitions -- Third Third Wastes	
728.135	Has the generator of a third third waste land disposed the waste only after having:	
	1) met the treatability standards of Part 728, Subpart D; or Yes____ No____ N/A ✓	728.135
	2) been granted an exemption from a prohibition pursuant to a petition under Section 728.106; or Yes____ No____ N/A ✓	
	3) met the applicable alternate standards established pursuant to a petition granted under Section 728.144; or Yes____ No____ N/A ✓	
	4) been granted an extension to the effective date of a prohibition pursuant to Section 728.105? Yes____ No____ N/A ✓	
728.135(j)	Has the generator of a third third waste listed in 728.110, 728.111 or 728.112 tested the waste or used his knowledge of the waste to determine whether it exceeds the applicable treatment standards of Sections 728.141 or 728.143? Yes ✓ No____ N/A____	728.135(j
	Section 728.139: Statutory Prohibitions	
728.139	Has a person caused, threatened or allowed the land disposal of any waste in violation of Section 3004 of RCRA? Yes____ No____ N/A ✓	728.139
	Subpart E: Prohibitions on Storage	
	Note: Except as provided in this section, the storage of hazardous wastes restricted from land disposal under Subpart C is prohibited.	
	Section 728.150: Prohibitions on Storage of Restricted Wastes	
728.150(a)(1)	Has the generator stored restricted wastes in tanks or containers on-site solely for the accumulation of such quantities as necessary to facilitate proper recovery, treatment or disposal? Yes ✓ No____ N/A____	728.150(a.
	Has the generator complied with the requirements of Section 722.134? Yes ✓ No____ N/A____	

Regulation	RCRA LDR INSPECTION CHECKLIST (PART 728)	Violation
	Note: A generator in existence on the effective date of regulation under this Part and who must store hazardous wastes for more than 90 days due to regulations under this Part becomes a TSD and must obtain a RCRA permit.	
728.150(a)(2)	Has the owner/operator of a TSD stored restricted wastes in tanks or containers solely for the accumulation of such quantities of hazardous waste to facilitate proper recovery, treatment or disposal? Yes ✓ No____ N/A____ If yes, has the owner/operator: A) clearly marked each container to identify its contents and the accumulation start date? Yes ✓ No____ N/A____ B) clearly marked each tank to identify its contents, recorded the quantity of each hazardous waste received and indicated the accumulation start date, all in accordance with the operating record requirements of 724.173 or 725.173? Yes ✓ No____ N/A____	728.150(a)(2)
728.150(a)(3)	Has the transporter stored manifested shipments of such wastes at a transfer facility for 10 days or less? Yes____ No____ N/A ✓	728.150(a)(3
728.150(b)	Has the owner/operator of a TSD stored restricted wastes up to one year solely for accumulation of such quantities of hazardous waste as necessary to facilitate proper recovery, treatment or disposal? Yes____ No____ N/A ✓	728.150(b)
728.150(c)	Has the owner/operator of a TSD who has stored such wastes beyond one year proved that such storage was solely for the accumulation of such quantities of hazardous waste to facilitate proper recovery, treatment or disposal? Yes____ No____ N/A ✓	728.150(c)
	Note: If a generator's waste is exempt from a prohibition on the type of land disposal utilized for the waste (e.g. case–by–case extension, incorporated by reference or an approved petition) the prohibition in subsection (a) does not apply during the period of such exemption. **Note:** The prohibition in subsection (a) does not apply to hazardous wastes that meet the treatment standards (728.141, 728.142 and 728.143) or the adjusted treatment standards (728.144) or where the treatment standards have not been specified, is in compliance with the applicable prohibitions in 728.132 or 728.139.	
728.150(f)	Have liquid hazardous wastes containing PCBs at concentrations greater than 50 ppm been stored at a facility that meets the requirements of 40 CFR 261.65(b) and have they been removed from storage and treated or disposed as required by this Part within one year of the date when such wastes were first placed into storage? Yes____ No____ N/A ✓	728.150(f)
	Note: The provisions of subsection (c) do not apply to such PCB wastes prohibited under Section 728.132.	
	COMMENTS:	

RECEIVED
AUG 10 1995
OFFICE OF RCRA
WASTE MANAGEMENT DIVISION
EPA, REGION V

Illinois Environmental Protection Agency
Division of Land Pollution Control

RCRA INSPECTION REPORT

USEPA #: IL D005450697		IEPA #: 0316000053	
Facility Name: Safety-Kleen Corporation Chicago RC		Phone #: 312/247-2828	
Street Address: 1445 West 42nd Street		County: Cook	
City: Chicago	State: IL	Zip: 60609	
Region: 2	Inspection Date: 1 / 20 / 95	From: 9:00AM	To: 11:00AM
Weather:			

TYPE OF FACILITY

Notified As: G, Trans, TSD, WAF, OSF	Regulated As: G, S, WAF
LDF? (Yes or No) No HPV? No	90-Day F/U Required?: YES ____ NO XXX

TYPE OF INSPECTION

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

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

NON-REGULATED STATUS N/A

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

PART A

Notification Date: 8 / 5 / 80, from (initial) or (subsequent) Notification.

Initial Part A Date: 11 / 19 / 80 Amended: 9 / 24 / 90

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

PART B PERMIT APPLICATION

Part B Permit Submitted: (Y) or N 11 / 19 / 88 Final Permit Issued: 9 / 30 / 92

ENFORCEMENT N/A

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

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

ORDERS ISSUED N/A

CACO: ___ / ___ / ___ CAFO: ___ / ___ / ___ Consent Decree: ___ / ___ / ___

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

TSD FACILITY ACTIVITY SUMMARY

Activity by Process Code	On Part A?	Activity Conducted Prior to 19807	Was Activity Ever Done?	Closed	Being done at Time of Insp.?	Exempt per 35 IAC, Sec.	On Annual Report 1993	1992	1991
S01	Yes	Yes	Yes	No	Yes	N/A	Yes	Yes	Yes
S02	Yes	Yes	Yes	No	Yes	N/A	Yes	Yes	Yes
R03	N/A	Yes	Yes	N/A	Yes	725.101(c)(b)	No	No	No

RECEIVED
FEB 08 1995
IEPA-DLPC

OWNER		OPERATOR	
Name	Safety-Kleen Corporation	Name	Safety-Kleen Corp. Chicago RC
Address	1000 North Randell Road	Address	1445 W. 42nd Street
City	Elgin	City	Chicago
State	IL Zip 60123	State	IL Zip 60609
Phone #	708/697-8460	Phone #	312/247-2828

PERSON(S) INTERVIEWED	TITLE	PHONE #
Alfred Aghapour	Facility Manager	312/247-2828
Ted Zajack	Operations Manager	312/247-2828
Edward R. DeSocio	Sr. Environmental Engineer	708/468-2548

INSPECTION PARTICIPANT(S)	AGENCY/TITLE	PHONE #
Anna Van Orden	IEPA/EPS	708/338-7900

PREPARED BY	AGENCY/TITLE	PHONE #
Anna Van Orden	IEPA/EPS	708/338-7900

SUMMARY OF APPARENT VIOLATIONS

Area	Class	Section

Area	Class	Section

Area	Class	Section

Safety-Kleen Corp. Chicago RC
0316000053 ILD005450697
January 20, 1995

RECEIVED
FEB 08 1995
IEPA-DLPC

NARRATIVE

The Safety-Kleen Chicago RC(SKCRC) is an organic chemicals reclamation and recycling facility permitted to treat and store hazardous waste under a Part B Permit.

The SKCRC accepts organic chemicals and solvent wastes from industrial and commercial facilities. Reclamation and recycling operations involve either regeneration of the spent solvent or blending and processing of the material for use as a hazardous waste fuel.

Processes utilized in the reclamation of used solvents, solvent mixtures and other solvent containing wastes include neutralization, distillation, fractionation, liquid-liquid extraction and drying.

SKCRC handles primarily two accounts:

1) The Toll Business - The toll customer (generally industrial accounts) ships waste or off-specification material to the SKCRC for treatment. The facility reclaims the material to the customer's specifications and returns the material to the generator.

2) The Recycling Business - The recycling business consists of industrial solvents which come to the SKCRC from Safety-Kleen sales network. These waste materials are recycled at the facility to Safety-Kleen corporate specifications and the processed material is sold as product on the market.

HAZARDOUS WASTE UNITS

TYPE	ACTIVE	CLOSED	WASTES	SIZE/ CAPACITY	(D)IKED; (C)ONCRETE/DIR(T)/ (G)RAVEL FLOOR; TYPE OF SECONDARY CONTAINMENT
SO1	Y	N	Numerous, See Part B	108,900 Gallons	D; C; Catch Basin
SO2	Y	N	Numerous, See Part B	1,119,865 Gallons	D; C; Vault w/coating on concrete

HAZARDOUS WASTES

Still Bottoms - F001, F002, F003, F005
- Residual material from the distillation process
- Rate of generation: 30,000 - 60,000 gal/month
- Shipped to Safety-Kleen in Clarksville, MO for fuel blending or reclamation.
- Amount on site: 29,994 gallons

Misc. Drummed Waste & Waste Filters - F001, F002, F003, F005
- Waste generated by various methods:
  - Cleaning out tanks
  - Used oil dry
  - Hose drippings
  - Cut drums in order to remove solid material
  - Used filters from filtering material from waste and product tanks
- Rate of generation: 30 - 45 drums/month
- Shipped to Safety-Kleen in Hebron, OH for fuel blending/ reclamation or further treatment.
- Amount on site: 20/55 gallon drums

Spent Solvent - D001, D006, D008, D035, D040
- Waste generated from two parts washers and one immersion cleaner unit.
- Rate of generation: 30 gal/month
- Shipped to Safety-Kleen in Dolton, IL for reclamation.
- Amount on site: 0

OBSERVATIONS

Facility has completed internal inspection of Tank Farm #4 and a PE report has been submitted to the Agency in December 1004.

Hazardous Waste Stream (Remanifasted Waste) has not been handled by this facility since the last shipment on 7/7/93.

Facility is utilizing the new parts cleaner(the Green Machine) which has a higher Flash Point. Identified on manifests as Combustible Liquid instead of Ignitable Liquid. The Green Machine has helped minimize Hazardous Waste.

At the time of the inspection, this facility was regulated as a generator, treatment, storage facility and marketer of hazardous waste fuel. The facility appeared to be in compliance with all applicable RCRA regulations and their Part B Permit requirements.

RCRA Part B Inspection Site # 0316000053

Section I: Containers

	Compliance	
A. Hazardous Waste Management Units	(YES)	NO
B. Waste Identification	(YES)	NO
C. Condition of Containers	(YES)	NO
D. Compatibility of Containers	(YES)	NO
E. Management of Containers	(YES)	NO
F. Inspections	(YES)	NO
G. Containment	(YES)	NO
H. Ignitable or Reactive Wastes	(YES)	NO
I. Special Requirements for Incompatible Wastes	(YES)	NO
J. General Operating Requirements	(YES)	NO
K. Closure Requirements	(YES)	NO

Description of violation: _____

Section II: Tank Systems

	Compliance	
B. Waste Identification	(YES)	NO
C. Containment and Detection of Releases	(YES)	NO
D. General Construction Requirements	(YES)	NO
E. General Operating Requirements	(YES)	NO
F. Tank System Certification	(YES)	NO
G. Response to Leaks or Spills	(YES)	NO

Section II: Tank Systems (continued)

	Compliance	
H. Inspections	(YES)	NO
I. Reporting and Recordkeeping	(YES)	NO
J. Ignitable and Reactive Wastes	(YES)	NO
K. Special Requirements for Incompatible Wastes	(YES)	NO
L. Closure	(YES)	NO

Description of violations: _____

Section III: Reporting and Notification Requirements

	Compliance	
Containers	(YES)	NO
Tank Systems	(YES)	NO
Corrective Action	(YES)	NO
Standard Conditions	(YES)	NO
Additional Special Conditions	(YES)	NO

Description of violations: _____

Section IV: Corrective Action

	Compliance	
E. Financial Assurance for Corrective Action	(YES)	NO
F. Notification Requirements for and Assessment of Newly-Identified Solid Waste Management Unit(s)	(YES)	NO
G. Future Releases from SWMUs	(YES)	NO
H. Completion of Corrective Action	(YES)	NO

Description of violations: _____

Section V: Standard Conditions

	Compliance	
A. General Requirements	(YES)	NO
B. General Facility Standards	(YES)	NO
C. Preparedness and Prevention	(YES)	NO
D. Contingency Plan	(YES)	NO
E. Manifest System, Recordkeeping and Reporting	(YES)	NO
F. Closure	(YES)	NO
G. Land Disposal Restrictions	(YES)	NO

Description of violations: _____

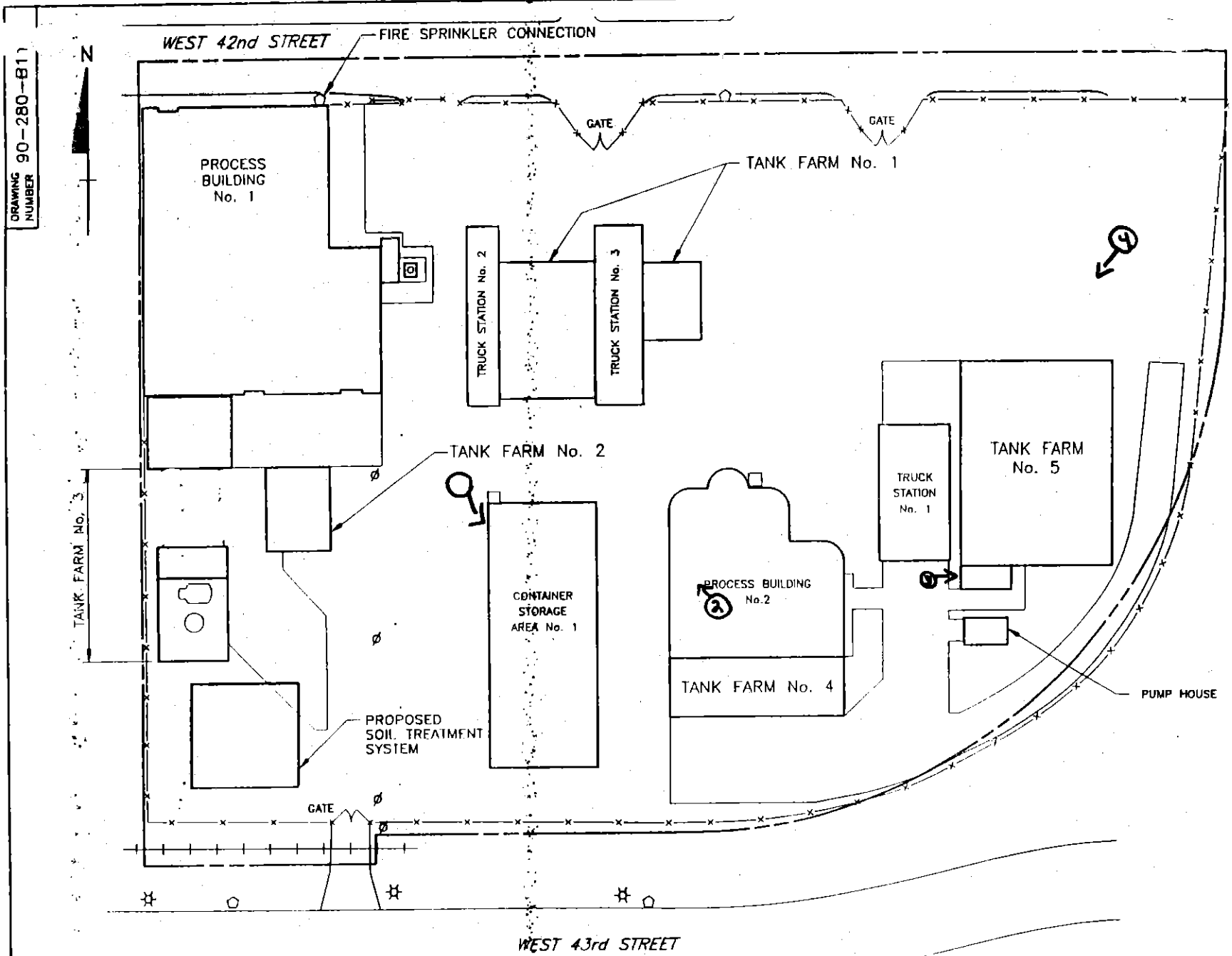
WASTE DISPOSITION FORM

Facility Name: SAFETY-KLEEN Corp. RC
USEPA # IL: D005450697
IEPA #: 0316000053

Waste Name (include haz & waste for which no determination has been made)	Generating Process (For waste gen. on site. N/A for TSD)	Date of Last Analysis	USEPA Haz Waste #	• On 8700-12	• On 3510-3	• 19 93	• 19 92	• 19 91	Amount on Site	Rate of Generation	Last Manifested Shipment	Disposition
Still Bottoms	Residue from distillation process	Every Shipment Analyzed	F001 F002 F003 F005	Y	Y	G F	G F	G F	29,994 gallons	30,000 - 60,000 gal/month	1/18/95	S/K Clarksville MO fuel blending
Spent Solvent	Parts washers		D001 D006 D008 D035 D040	Y	Y	G F	G F	G F	Ø	30 gal month	12/27/94	S/K Dolton, IL. Reclamation
misc. Drumed waste (Solids)	Filters, spills, cleanings		F001 F002	Y	Y	G F	G F	G F	20 Drums	30-45 drums month	12/15/94	S/K Hebron, OH fuel blending or incineration
						G F	G F	G F				
						G F	G F	G F				
						G F	G F	G F				
						G F	G F	G F				
						G F	G F	G F				
						G F	G F	G F				
						G F	G F	G F				
						G F	G F	G F				

On Annual Report for: (Circle if present; cross out if not present)

* All "Y" responses must be explained in narrative



Safety-Kleen Chicago RC
0316000053
January 20, 1995

SAFETY-KLEEN 0316000053

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
	Part 722: Standards Applicable to Generators of Hazardous Waste (>1000 Kg/mo.)	
	Subpart A: General	
	Section 722.111: Hazardous Waste Determination	
722.111	Has the generator correctly determined if the solid waste(s) it generates is a hazardous waste? Yes ✓ No____ N/A____	722.111
	Have hazardous wastes been identified for purposes of compliance with Part 728? Yes ✓ No____ N/A____	
808.121(a)	Has the generator correctly determined if the solid waste(s) it generates is a special waste? Yes ✓ No____ N/A____	808.121(a)
	Section 722.112: USEPA Identification Numbers	
722.112(a)	Has the generator obtained a USEPA identification number? Yes ✓ No____ N/A____	722.112(a)
722.112(c)	Has the generator offered its hazardous waste only to transporters or to treatment, storage or disposal facilities that have a USEPA identification number? Yes ✓ No____ N/A____	722.112(c)
	Subpart B: The Manifest	
	Section 722.120: General Requirements	
722.120(a)	Does the facility manifest its waste off-site? Yes ✓ No____ N/A____	722.120(a)
722.120(b)	Does the manifest designate a facility permitted to handle the waste? Yes ✓ No____ N/A____	722.120(b)
722.120(d)	Has the generator shipped any waste that could not be delivered to the designated facility? Yes____ No ✓ N/A____	722.120(d)
	Section 722.121: Acquisition of Manifests	
	Has the generator used:	
722.121(a)	– an Illinois manifest for wastes designated to a facility within Illinois? Yes ✓ No____ N/A____	722.121(a)
722.121(b)	– a manifest from the State to which the manifest is designated? Yes ✓ No____ N/A____	722.121(b)
	– an Illinois manifest if the State to which the waste is designated has no manifest of its own? Yes____ No____ N/A ✓	
	Section 722.122: Number of Copies	
722.122	Does the manifest consist of at least 6 copies? Yes ✓ No____ N/A____	722.122
	Section 722.123: Use of the Manifest	
	For each manifest reviewed, has the generator:	
722.123(a)	– signed the certificate by hand? Yes ✓ No____ N/A____	722.123(a)
	– obtained the handwritten signature and the date of acceptance by the initial transporter? Yes ✓ No____ N/A____	
	– retained one copy as required by Section 722.140(a)? Yes ✓ No____ N/A____	
	– apparently sent a copy (part 5 for the Illinois manifest) to the Agency within 2 working days? Yes ✓ No____ N/A____	
722.123(b)	– has the generator apparently given the remaining copies to the transporter? Yes ✓ No____ N/A____	722.123(b)

RECEIVED
FEB 08 1995
IEPA-DLPC

Regulation		Violation
722.123(c)	– has the generator followed the procedures prescribed in Section 722.123 for manifesting bulk shipments of hazardous waste by rail or water? Yes____ No____ N/A✓	722.123(c)
	Subpart C: Pre–Transport Requirements	
	Is there any hazardous waste ready for transport off–site? Yes____ No✓ N/A____	
	If so, is the generator complying with the pre–transport requirements in Subpart C? Yes____ No____ N/A____	
	Section 722.134: Accumulation Time	
722.134(a)	Has the generator complied with the following requirements: Yes✓ No____ N/A____	722.134(a)
722.134(a)(1)	A) For waste in containers, has the generator complied with the requirements of Part 725, Subpart I? Yes✓ No____ N/A____	
	and/or B) For waste in tanks, has the generator complied with the requirements of Part 725, Subpart J (except Sections 725.297(c) and 725.300)? Yes✓ No____ N/A____	
	and/or C) For waste on drip pads, has the generator complied with the requirements of Part 725, Subpart W and maintained the required records identified in this subsection? Yes____ No____ N/A✓	
	and/or D) For waste in containment buildings, has the generator complied with Part 725, Subpart DD and maintained the required records identified in this subsection? Yes____ No____ N/A✓	
722.134(a)(2)	For waste in containers, has the generator marked and made visible for inspection on each container, the date upon which accumulation began? Yes✓ No____ N/A____	
722.134(a)(3)	For waste in containers and tanks, has the generator marked or labeled each with the words "Hazardous Waste"? Yes✓ No____ N/A____	
722.134(a)(4)	Has the generator complied with the requirements of Part 725, Subparts C and D, and Sections 725.116 and 728.107(a)(4)? Yes✓ No____ N/A____	
	Specifically, the requirements of items 1 and/or 4 above (listed by regulation) which need to be complied with are as follows:	
	Does the facility accumulate hazardous waste in **containers?** Yes✓ No____ N/A____	
	If "No", go to Subpart J.	

Subpart I: Use and Management of Containers

Has the generator closed an accumulation area?
Yes____ No____ N/A ✓

(725.211) (725.214) If "Yes", was the accumulation area closed in accordance with Sections 725.211 and 725.214?
Yes____ No____ N/A ✓

(725.271) If the containers have leaked or are in poor condition, has the owner/operator transferred the hazardous waste to a suitable container?
Yes____ No____ N/A ✓

(725.272) Is the waste compatible with the container and/or liner?
Yes ✓ No____ N/A____

(725.273a) Are containers of hazardous waste always closed except to remove or add waste during accumulation?
Yes ✓ No____ N/A____

(725.273b) Are containers of hazardous waste being opened, handled, or stored in a manner which will prevent the rupture of the container or prevent it from leaking?
Yes ✓ No____ N/A____

(725.274) Is the owner/operator inspecting the accumulation area(s) at least weekly, looking for leaks or deterioration?
Yes ✓ No____ N/A____

Is the accumulation area free from any evidence of leaking or deteriorating containers? (See also Section 725.131)
Yes ✓ No____ N/A____

(725.276) Are containers holding ignitable or reactive wastes located at least 15 meters (50 feet) from the facility's property line?
Yes ✓ No____ N/A____

Note: See Section 725.117(a) for additional requirements for ignitable, reactive or incompatible wastes.

(725.277) Is the owner/operator complying with the requirements concerning incompatible wastes?
Yes ✓ No____ N/A____

Comments:

Does the generator accumulate and/or treat hazardous waste in tanks?
Yes ✓ No____ N/A____

Note: If "No", go to Subpart C.

Regulation		Violation
	Subpart C: Preparedness and Prevention	
(725.131)	Is the facility being operated and maintained to minimize the possibility of a fire, explosion or any release of hazardous waste or hazardous waste constituents which could threaten human health or the environment? Yes ✓ No____ N/A____	
(725.132)	Is the facility equipped with the following, if necessary:	
	a) an internal communication or alarm system(s)? Yes ✓ No____ N/A____	
	b) a telephone or other device to summon emergency assistance from local authorities? Yes ✓ No____ N/A____	
	c) portable fire extinguishers, fire control equipment, spill control equipment and decontamination equipment? Yes ✓ No____ N/A____	
	d) water at adequate volume and pressure for fire control? Yes ✓ No____ N/A____	
(725.133)	Is the facility testing and maintaining communication/alarm system(s), fire protection equipment, spill control equipment and decontamination equipment? Yes ✓ No____ N/A____	
(725.134)	a) Where hazardous waste is being handled, do all employees have immediate access to an internal alarm or other emergency communication device? Yes ✓ No____ N/A____	
	b) If there is ever just one employee on the premises when the facility is operating, does he/she have immediate access to a device capable of summoning external emergency assistance? Yes____ No____ N/A ✓	
(725.135)	Is the facility maintaining adequate aisle space? Yes ✓ No____ N/A____	
(725.137)	Has the facility attempted to make the following arrangements, as appropriate, for the type of facility and waste:	
	– arrangements with local emergency authorities (i.e. police and fire departments, other emergency response agencies) to familiarize them with the layout of the facility, properties of hazardous waste handled, places where facility personnel would be working, entrances to roads inside the facility and evacuation routes? Yes ✓ No____ N/A____	
	– agreements designating the primary authority where more than one police or fire department might respond? Yes ✓ No____ N/A____	
	– agreements with State emergency response teams, contractors and equipment suppliers? Yes ✓ No____ N/A____	
	– arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the type of injuries or illnesses which could result from fires, explosions or releases at the facility? Yes ✓ No____ N/A____	
	Subpart D: Contingency Plan and Emergency Procedures	
(725.151a)	Is the contingency plan available? Yes ✓ No____ N/A____	
	If "No", skip to Section 725.155.	
	Is the plan designed to protect human health and the environment from releases to the air, soil and water? Yes ✓ No____ N/A____	
(725.151b)	Has there been a fire, explosion or release of hazardous waste? Yes____ No____ N/A ✓	
	If "Yes", has the contingency plan been carried out immediately? Yes____ No____ N/A ✓	

(725.152a) Does the plan describe the actions required for response to:
- fires? Yes ✓ No____ N/A____
- explosions? Yes ✓ No____ N/A____
- releases? Yes ✓ No____ N/A____

(725.152c) Does the plan describe arrangements with:
- police and fire departments? Yes ✓ No____ N/A____
- hospitals? Yes ✓ No____ N/A____
- contractors? Yes ✓ No____ N/A____
- emergency response teams? Yes ✓ No____ N/A____

(725.152d) Does the plan contain the current emergency coordinator's name, phone (office and home) and address? Yes ✓ No____ N/A____

(725.152e) Does the plan identify all emergency equipment including:
- description? Yes ✓ No____ N/A____
- capability? Yes ✓ No____ N/A____
- location? Yes ✓ No____ N/A____

Is the list of emergency equipment up-to-date? Yes ✓ No____ N/A____

(725.152f) Does the plan include:
- an evacuation plan? Yes ✓ No____ N/A____
- an evacuation signal? Yes ✓ No____ N/A____
- alternate evacuation routes? Yes ✓ No____ N/A____

(725.153) Has the contingency plan (including all revisions) been:
a) maintained at the facility? Yes ✓ No____ N/A____
b) submitted to:
- police department? Yes ✓ No____ N/A____
- fire department? Yes ✓ No____ N/A____
- hospital? Yes ✓ No____ N/A____
- emergency response teams? Yes ✓ No____ N/A____

(725.154) Has the contingency plan been reviewed and revised whenever:
a) regulations are revised? Yes ✓ No____ N/A____
b) the plan fails in an emergency? Yes____ No____ N/A ✓
c) the facility changes in a way that modifies the emergency response necessary? Yes ✓ No____ N/A____
d) information regarding emergency coordinators changes? Yes ✓ No____ N/A____
e) information regarding equipment changes? Yes ✓ No____ N/A____

(725.155) Is the emergency coordinator on-site or on call at all times? Yes ✓ No____ N/A____

Is the emergency coordinator familiar with all facility activities, wastes, records, layout and contingency plan? Yes ✓ No____ N/A____

Does the emergency coordinator have the authority to commit the resources needed to carry out the actions specified in the contingency plan? Yes ✓ No____ N/A____

(725.156) If the facility has had a release, fire or explosion, have the procedures of this Section been followed regarding assessment, response and reporting? Yes____ No____ N/A ✓

Note: If the facility has had a release, explain in detail.

Regulation		Violation
	Section 725.116: Personnel Training	
(725.116a)	Does the facility have a training program? Yes ✓ No____ N/A____	
	Have facility personnel 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 Part 725? Yes ✓ No____ N/A____	
	Is the program directed by a person trained in hazardous waste management procedures? Yes ✓ No____ N/A____	
	Does the program teach facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to the positions in which they are employed? Yes ✓ No____ N/A____	
	Does the program cover, at a minimum:	
	– procedures to familiarize facility personnel with emergency procedures, emergency equipment and emergency systems? Yes ✓ No____ N/A____	
	– procedures for using, inspecting, repairing and replacing facility emergency and monitoring equipment? Yes ✓ No____ N/A____	
	– key parameters for automatic waste feed cut-off systems? Yes ✓ No____ N/A____	
	– communications or alarm systems? Yes ✓ No____ N/A____	
	– response to fire or explosions? Yes ✓ No____ N/A____	
	– response to groundwater contamination incidents? Yes ✓ No____ N/A____	
	– shutdown of operations? Yes ✓ No____ N/A____	
(725.116b)	Have new employees completed the program within 6 months of the date of employment or assignment to a position requiring them to manage hazardous waste? Yes ✓ No____ N/A____	
(725.116c)	Have facility personnel received an annual review of the initial training? Yes ✓ No____ N/A____	
(725.116d)	Are the following documents and records being maintained at the facility:	
	1) the job title for each position related to hazardous waste management and the name(s) of the employee(s) filling each job? Yes ✓ No____ N/A____	
	2) a written job description for each position above, including the requisite skill, education or other qualifications and duties of personnel assigned to each position? Yes ✓ No____ N/A____	
	3) a written description of the type and amount of both initial and continuing training that will be given to each person filling a position dealing with hazardous waste management? Yes ✓ No____ N/A____	
	4) records documenting that the training or job experience has been given to and completed by facility personnel? Yes ✓ No____ N/A____	
(725.116e)	Is the facility maintaining training records until closure of the facility and those of former employees for at least 3 years from the last date of employment? Yes ✓ No____ N/A____	

Regulation		Violation
	Section 728.107: Waste Analysis and Recordkeeping	
728.107a4)	Has the generator who treats a prohibited waste in tanks or containers in order to meet the treatment standards developed and followed a waste analysis plan? Yes ✓ No____ N/A____	
	Is the plan on–site? Yes ✓ No____ N/A____	
	Does the plan include a detailed physical and chemical analysis? Yes ✓ No____ N/A____	
	Has the plan been filed with the Agency at least 30 days prior to commencement of treatment activity? Yes ✓ No____ N/A____	
	Has the generator submitted the required notification and certification that the waste meets treatment standards when the waste is shipped off–site? Yes ✓ No____ N/A____	
	Subsection 722.134(c): Satellite Accumulation	
722.134(c)	Is the generator who accumulates hazardous waste at or near any point of generation where wastes initially accumulate and which is under the control of the operator of the process generating the waste limiting such accumulation to 55 gallons of hazardous waste or 1 quart of acutely hazardous waste marking the containers with the words "Hazardous Waste" or other words identifying the contents? Yes ✓ No____ N/A____	722.134(c)
	Has the generator who accumulates more than 55 gallons of hazardous waste or 1 quart of acutely hazardous waste complied with the requirements of Section 722.134(a) within 3 working days? Yes____ No____ N/A ✓	
	If there are more than 55 gallons of hazardous waste or 1 quart of acutely hazardous waste in the satellite accumulation area, are the containers marked with the date accumulation began? Yes____ No____ N/A ✓	
	During the 3 day period, is the generator continuing to comply with the requirements of Section 722.134(c)(1) with respect to the excess waste? Yes____ No____ N/A ✓	
	Subpart D: Recordkeeping and Reporting	
	Section 722.140: Recordkeeping	
722.140(a)	Has the generator retained for a period of 3 years: – a copy of each signed manifest? Yes ✓ No____ N/A____	722.140(a)
722.140(b)	Has the generator retained a copy of each Annual Report and Exception Report for a period of at least three years from the due date of the report (March 1)? Yes ✓ No____ N/A____	722.140(b)
722.140(c)	Has the generator retained for a period of 3 years: – copies of test results, waste analyses or other determinations made in accordance with Section 722.111? Yes ✓ No____ N/A____	722.140(c)
722.140(d)	Does a generator who is involved in any unresolved enforcement action or as requested by the Director continue to maintain the records required in subsections a) and c)? Yes____ No____ N/A ✓	722.140(d)
	Section: 722.141: Annual Reporting	
722.141(a)	Has the generator who ships hazardous waste off–site for treatment, storage or disposal filed an annual report with the Agency by March 1 for the preceding calendar year? Yes ✓ No____ N/A____	722.141(a)
	Note: If "No", or if deficiencies are noted with the annual report reviewed, contact the Planning and Reporting Section.	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
722.141(b)	Has the generator who treats, stores or disposes of hazardous waste on-site, filed an annual report with the Agency by March 1 for the preceding calendar year? Yes ✓ No____ N/A____	722.141(b)
	Section 722.142: Exception Reporting	
722.142(a)(1)	If the generator has not received a copy of the manifest from the TSD facility within 35 days of the date of delivery to the transporter, has the generator contacted the transporter or the TSD facility to determine the status of the hazardous waste? Yes____ No____ N/A ✓	722.142(a)(1)
722.142(a)(2)	If the generator has not received a copy of the signed manifest within 45 days of the date of delivery to the transporter, has he filed an exception report with the Agency in accordance with the requirements of this Section? Yes____ No____ N/A ✓	722.142(a)(2)
	Section 722.143: Additional Reporting	
722.143	Has the generator furnished additional reports as required by the Director? Yes____ No____ N/A ✓	722.143
	Subpart E: Exports of Hazardous Waste	
	Is the generator an exporter of hazardous waste? Yes____ No____ N/A ✓	
	If "Yes", has the generator complied with the requirements of Subpart E? Yes____ No____ N/A ✓	
	Subpart F: Imports of Hazardous Waste	
	Is the generator an importer of hazardous waste? Yes____ No____ N/A ✓	
	If "Yes", has the generator complied with the requirements of Subpart F? Yes____ No____ N/A ✓	
	Subpart G: Farmers	
	Is the generator a farmer? Yes____ No____ N/A ✓	
	If "Yes", has the generator complied with the requirements of Subpart G? Yes____ No____ N/A ✓	
	Comments:	

Subpart J: Tank Systems

Has the generator closed an accumulation area?
Yes____ No____ N/A✓

(725.211) (725.214) If "Yes", was the accumulation area closed in accordance with Sections 725.211 and 725.214?
Yes____ No____ N/A✓

(725.290) Does the facility accumulate or treat hazardous waste in tanks?
Yes✓ No____ N/A____

Note: A generator may treat hazardous waste in a tank for less than 90 days without a RCRA permit.

If "No", skip Subpart J.

a) Tank systems that are used to accumulate or treat hazardous waste which contains no free liquids (using the Paint Filter Liquids Test) and that are situated inside a building with an impermeable floor are exempted from the requirements in Section 725.293.
b) Tank systems, including sumps, that serve as part of a secondary containment sytem to collect or contain releases of hazardous wastes are exempted from the requirements in Section 725.293(a).
c) Tanks, sumps and other collection devices used in conjunction with drip pads (as defined in Section 720.110) and regulated under Subpart W, must meet the requirements of this Subpart.

(725.291a) For tanks <u>existing</u> prior to July 14, 1986 (see definition of tank system under 720.110)and not protected by a secondary containment system, has a written assessment been reviewed and certified by an IRPE(*) in accordance with Section 702.126(d) by January 12, 1988 [except as provided in Section 725.291(c)]?
Yes____ No____ N/A✓

(725.291b) Does this assessment consider at least the following:
1) design standards for the tank and ancillary equipment?
Yes____ No____ N/A✓
2) hazardous characteristics of the wastes?
Yes____ No____ N/A✓
3) existing corrosion protection measures?
Yes____ No____ N/A✓
4) documented age of the tank system?
Yes____ No____ N/A✓
5) results of a leak test, internal inspection, or other tank integrity examination?
Yes____ No____ N/A✓

(725.291c) Has a tank system assessment been performed within 12 months after the materials in the tank become a hazardous waste?
Yes✓ No____ N/A____

Note: If an assessment indicates a tank system is leaking or unfit for use, the owner/operator must comply with the requirements of Section 725.291(b)(5).

(725.292a) For <u>new</u> tanks (see definition of new tanks under Section 720.110) whose installation commenced after 7/14/86, has a written assessment been reviewed and certified by an IRPE in accordance with Section 702.126(d) prior to operation of the tank system?
Yes✓ No____ N/A____

Does the assessment include, at a minimum, the following:
1) design standards for tanks and ancillary equipment?
Yes✓ No____ N/A____
2) hazardous characteristics of the waste(s) to be handled?
Yes✓ No____ N/A____
3) evaluation of potential for corrosion and corrosion protection measures for tank systems with metal components in contact with soil or water?
Yes✓ No____ N/A____

*IRPE = Independent Registered Professional Engineer

4) design or operational measures that will protect underground tank systems from potential damage resulting from vehicular traffic?
Yes____ No____ N/A ✓

5) designs to ensure adequate foundations, anchoring to prevent flotation or dislodgement and the ability to withstand the effects of frost heave?
Yes____ No____ N/A ✓

(725.292g) Has the owner/operator obtained and kept on file at the facility the written statements, including the certification statements [as required in Section 702.126(d)] of the design and installation requirements of Subsections (b) through (f)?
Yes ✓ No____ N/A____

(725.293a) Is **secondary containment** provided for any new tank system before being put into service?
Yes ✓ No____ N/A____

Does an existing tank, used to accumulate F020, F021, F022, F023, F026 or F027 waste(s), have secondary containment by 1/12/89?
Yes____ No____ N/A ✓

For an existing tank of documentable age, is secondary containment provided by 1/12/89 or when the tank is 15 years old, whichever is later?
Yes ✓ No____ N/A____

For an existing tank of undocumentable age, has secondary containment been provided by 1/12/95?
Yes ✓ No____ N/A____

or
if the **facility** is older than 7 years, by the time the **facility** reaches 15 years of age or 1/12/89, whichever is later?
Yes ✓ No____ N/A____

For tanks that accumulate wastes that become hazardous after 1/12/87, has secondary containment been provided within the time intervals required in Subsections (a)(1) through (a)(4) substituting the date that a material becomes a hazardous waste for 1/12/87?
Yes ✓ No____ N/A____

(725.293b) Is the secondary containment system designed, installed and operated to prevent migration of wastes or accumulated liquid out of the system at any time?
Yes ✓ No____ N/A____

Is the secondary containment system capable of detecting and collecting releases and accumulated liquids until the collected material is removed?
Yes ✓ No____ N/A____

(725.293c) To meet the requirements of Subsection (b), is the secondary containment system:

1) compatible with the waste(s) in the tank and of sufficient strength and thickness to prevent failure?
Yes ✓ No____ N/A____

2) placed on a foundation or base capable of providing support, providing resistance to pressure gradients and preventing failure due to settlement, compression of uplift?
Yes ✓ No____ N/A____

3) provided with a leak detection system designed and operated to detect any release or accumulated liquid within 24 hours?
Yes ✓ No____ N/A____

4) sloped or otherwise designed or operated to drain and remove liquids resulting from leaks, spills or precipitation?
Yes ✓ No____ N/A____

and
is spilled or leaked waste and accumulated precipitation removed from the secondary containment within 24 hours?
Yes ✓ No____ N/A____

Note: A RCRA permit may allow for removal of liquids less frequently than 24 hours after accumulation.

Regulation		Violation
(725.293d)	Does the secondary containment for tanks have one or more of the following: 1) a liner (external to the tank); or 2) a vault; or 3) a double-walled tank; or 4) an equivalent device (approved by the Board)? Yes ✓ No____ N/A____	
(725.293e)	Does the external liner system(s), vault system(s) and/or double-walled tank(s) meet the additional requirements identified in Section 725.293(e)? Yes ✓ No____ N/A____	
(725.293f)	Is ancillary equipment protected by secondary containment that meets the requirement of Subsection (h) and (c)? Yes ✓ No____ N/A____ If "No": 1) Is aboveground piping (exclusive of flanges, joints, valves and connections) inspected daily? Yes ✓ No____ N/A____ 2) Are welded flanges, joints and connections inspected daily? Yes ✓ No____ N/A____ 3) Are sealless or magnetic coupling pumps and sealless valves inspected daily? Yes ✓ No____ N/A____ 4) Are pressurized aboveground piping systems with automatic shut-off devices inspected daily? Yes ✓ No____ N/A____	
(725.293i)	Until such time as secondary containment is provided, are the following requirements being met for all tank systems: 1) For non-enterable underground tanks, has an annual leak test that meets the requirements of 725.291(b)(5) been conducted? Yes____ No____ N/A ✓ 2) For other than non-enterable underground tanks and ancillary equipment, has an annual leak test, internal inspection or other tank integrity examination by an IRPE been conducted? Yes____ No____ N/A ✓ 3) Are written records maintained at the facility to document the assessments required under Subsections (i)(1) and (i)(2)? Yes____ No____ N/A ✓ **Note:** If a tank system is found to be leaking or unfit for use as a result of a leak test or assessment, the owner/operator must comply with Section 725.296.	
(725.294a)	Has the owner/operator placed hazardous wastes or treatment reagents in the tank system that could cause the system to rupture, leak, corrode or otherwise fail? Yes____ No ✓ N/A____	
(725.294b)	Do tanks and secondary containment have appropriate controls and practices to prevent spills and overflows including: 1) spill prevention controls? Yes ✓ No____ N/A____ 2) overfill prevention controls? Yes ✓ No____ N/A____ 3) sufficient freeboard in uncovered tanks? Yes____ No____ N/A ✓	
(725.294c)	**Note:** If a leak or spill has occurred in the tank system, the owner/operator shall comply with the requirements of Section 725.296.	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.295a)	Does the owner/operator **inspect**, if present, at least each operating day, the following:	
	1) overfill/spill control equipment? Yes ✓ No____ N/A____	
	2) the aboveground portion of the tank system for corrosion or releases? Yes ✓ No____ N/A____	
	3) data from monitoring equipment? Yes ✓ No____ N/A____	
	4) the construction materials and the area immediately surrounding the external portion of the system? Yes ✓ No____ N/A____	
(725.295b)	If the tank system has cathodic protection, is the owner/operator complying with Section 725.295(b) to ensure that they are functioning properly? Yes ✓ No____ N/A____	
(725.295c)	Does the owner/operator document in the operating record, the results of tank inspections as required in Section 725.295(a) and (b)? Yes ✓ No____ N/A____	
(725.296)	If the tank system or secondary containment system has a leak or spill or is unfit for use, has the owner/operator:	
	a) immediately ceased using; prevented flow or addition of waste and inspected the system to determine the cause of the release? Yes____ No____ N/A ✓	
	b) removed applicable waste from the system within 24 hours of detection? Yes____ No____ N/A ✓	
	c) immediately conducted a visual inspection of the release and taken actions to contain visible releases to the environment, prevented further migration to soils or surface water and removed and properly disposed of any contaminated soil or water? Yes____ No____ N/A ✓	
(725.296d)	d) notified the Agency within 24 hours of detection of release? Yes____ No____ N/A ✓	
	d)3) within 30 days of detection of release, submitted a report to the Agency that complies with the requirements of Section 725.296(d)(3)? Yes____ No____ N/A ✓	
	Note: Notification and reports are not necessary if less than 1 pound of material is spilled and it was immediatey contained and cleaned up.	
(725.296e)	e) repaired the tank system prior to returning the tank system to service in the event that a leak has occurred from the primary tank system into the secondary containment system? Yes____ No____ N/A ✓	
	e)4) provided secondary containment before returning a tank system to service in the event that the release was from a component of a tank system without secondary containment? Yes____ No____ N/A ✓	
	e)4) met the requirements for a new tank system in the event that a component is replaced during repair? Yes____ No____ N/A ✓	
	e)4) provided the entire component with secondary containment prior to being returned to use in the event that a leak has occurred in any portion of a component that is not readily accessible for visual inspection? Yes____ No____ N/A ✓	
(725.296f)	f) In the event that an extensive repair has been conducted in accordance with subsection (e), submitted to the Agency within 7 days after returning the tank system to use, a certification by an IRPE stating that the repaired system is capable of handling hazardous wastes without release for the intended life of the system? Yes____ No____ N/A ✓	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
	Note: If the owner/operator does not satisfy the requirements of subsections (e)(2) through (e)(4), the tank system must be closed in accordance with Section 725.297.	
725.297a)	At the time of closure of a tank system, has the owner/operator removed or decontaminated all waste residues, contaminated components, contaminated soils and structures and equipment and managed them as hazardous waste [unless Section 721.103(d) applies]? Yes____ No____ N/A ✓	
(725.297a)	Have the closure plan, closure activities, cost estimates for closure and financial responsibility for tank systems met all requirements specified in Subparts G and H? Yes ✓ No____ N/A____	
(725.297b)	If the tank system cannot be "clean" closed, has the owner/operator closed the tank system and performed post–closure care in accordance with the closure and post–closure care requirements that apply to landfills (Section 725.410)? Yes____ No____ N/A ✓	
	Note: Such a tank system is considered a landfill and must meet all of the requirements of landfills specified in Subparts G and H.	
(725.298a)	Are ignitable or reactive wastes placed in a tank system? Yes ✓ No____ N/A____	
	If "No", skip to Section 725.299.	
	Is the waste treated, rendered or mixed before or immediately after placement in the tank system so that: – the resulting waste, mixture or dissolved material is no longer ignitable or reactive? Yes____ No____ N/A ✓ – Section 725.117(b) is complied with? Yes ✓ No____ N/A____	
	or Is the waste accumulated or treated so that it is protected from any material or conditions which may lead to ignition or reaction? Yes ✓ No____ N/A____	
	or Is the tank used solely for emergencies? Yes____ No____ N/A ✓	
(725.298b)	Is the facility complying with the requirements regarding maintenance of protective distances between the waste management area and any public ways, streets, alleys or any adjoining property line? Yes ✓ No____ N/A____	
(725.299)	Are incompatible wastes/materials placed in the same tank? Yes____ No ✓ N/A____	
	If "No", skip to Section 725.300.	
	Is Section 725.117(b) being complied with? Yes____ No____ N/A ✓	
	Has the tank system been properly decontaminated if it previously held an incompatible waste/material unless Section 725.117(b) is complied with? Yes____ No____ N/A ✓	
	COMMENTS:	

Regulation	RCRA LDR INSPECTION CHECKLIST (PART 728)	Violation
	Part 728: Land Disposal Restrictions	
	Subpart A: General	
	Section 728.103: Dilution Prohibited as a Substitute for Treatment	
728.103(a)	**Has a person diluted a restricted waste or a treatment residual of a restricted waste as a substitute for adequate treatment?** Yes____ No____ N/A ✓	728.103(a)
	Note: Has any person filed for a petition to allow land disposal of wastes prohibited under Subpart C of Part 728? Yes____ No____ N/A ✓	
	Section 728.104: Treatment Surface Impoundment Exemption	
728.104	Are wastes that are otherwise prohibited from land disposal under this Part being treated in a surface impoundment that meets the requirements of this Section? Yes____ No____ N/A ✓	728.104
	Section 728.107: Waste Analysis and Recordkeeping	
728.107(a)	**Has the generator tested the waste [as specified in 728.107(a)] or used knowledge of the waste to determine if the waste is restricted from land disposal?** Yes ✓ No____ N/A____	728.107(a)
728.107(a)(1)	**If a generator determines that its waste is restricted, has a notice been sent with each shipment that includes the following information:**	728.107(a)(1)
	A) USEPA Hazardous Waste Number? Yes ✓ No____ N/A____	
	B) corresponding treatment standards or a reference to the treatment standard by section or applicable treatment code? Yes ✓ No____ N/A____	
	C) manifest number associated with the shipment of waste? Yes ✓ No____ N/A____	
	D) for hazardous debris, the contaminants subject to treatment as provided by Section 728.145(b) and the following statement: "This hazardous debris is subject to the alternative treatment standards of Section 728.145?" Yes____ No____ N/A ✓	
	E) waste analysis data, where available? Yes ✓ No____ N/A____	
728.107(a)(2)	Has the generator of a restricted waste that meets the applicable treatment standards submitted, with each shipment, a notice and certification, as specified in this Section, stating that the waste meets applicable treatment standards and can be land disposed without further treatment? Yes____ No____ N/A ✓	728.107(a)(2)
728.107(a)(3)	Has the generator of a restricted waste that has been exempted under Section 728.106 submitted a notice, as specified in this section, with each shipment to the receiving facility, stating that the waste is not prohibited from land disposal? Yes____ No____ N/A ✓	728.107(a)(3)
728.107(a)(4)	Has the generator who treats a prohibited waste in tanks or containers in order to meet the treatment standards developed and followed a waste analysis plan? Yes ✓ No____ N/A____	728.107(a)(4)
	Is the plan on-site? Yes ✓ No____ N/A____	
	Does the plan include a detailed physical and chemical analysis? Yes ✓ No____ N/A____	
	Has the plan been filed with the Agency at least 30 days prior to commencement of the treatment activity? Yes ✓ No____ N/A____	

Regulation	RCRA LDR INSPECTION CHECKLIST (PART 728)	Violation
	Has the generator submitted the required notification and certification that the waste meets treatment standards when the waste is shipped off-site? Yes ✓ No___ N/A___	
728.107(a)(5)	Has the generator who has determined that the waste is restricted based on the generator's knowledge and/or testing of the waste retained all supporting data used to make this determination on-site? Yes ✓ No___ N/A___	728.107(a)(5)
728.107(a)(6)	If a generator determines, subsequent to the time of generation, that the generator is managing a restricted waste which is excluded from the definition of hazardous or solid waste or exempt from RCRA, has a one-time notification stating such generation been placed in the generator's files? Yes___ No___ N/A ✓	728.107(a)(6)
728.107(a)(7)	Does a generator keep on-site a copy of all notices, certifications, demonstrations, waste analysis data and other documentation produced pursuant to this Section for at least five years from the date of the latest shipment? Yes ✓ No___ N/A___	728.107(a)(7)
728.107(a)(8)	If a generator is managing a lab pack that contains waste identified in Appendix D of Part 728 and wishes to use the alternative treatment standard under Section 728.142, has the generator submitted a notice and certification to the treatment facility with each shipment in accordance with this subsection? Yes___ No___ N/A ✓	728.107(a)(8)
728.107(a)(9)	If a generator is managing a lab pack that contains organic waste identified in Appendix E of Part 728 and wishes to use the alternative treatment standard, has the generator submitted a notice and certification to the treatment facility with each shipment in accordance with this subsection? Yes___ No___ N/A ✓	728.107(a)(9)
728.107(a 10)	Has a small-quantity generator with a tolling agreement pursuant to Section 722.120(e) retained on site a copy of the notification and certification of the initial waste shipment together with the tolling agreement for at least 3 years after the termination or expiration of the agreement? Yes___ No___ N/A ✓	728.107(a)(10)
728.107(b)	Has the treatment facility tested its waste according to the frequency specified in its waste analysis plan as required by Sections 724.113 or 725.113 and subsections (b)(1), (b)(2) and (b)(3) of this section? Yes ✓ No___ N/A___	728.107(b)
728.107(b)(4)	Has the treatment facility sent a notice to the land disposal facility with each shipment of waste that includes the following information: A) USEPA Hazardous Waste Number? Yes___ No___ N/A ✓ B) corresponding treatment standards or a reference to the treatment standard by section or applicable treatment code? Yes___ No___ N/A ✓ C) manifest number associated with the shipment of waste? Yes___ No___ N/A ✓ D) waste analysis data, where available? Yes___ No___ N/A ✓	728.107(b)(4)
728.107(b)(5)	Has the treatment facility submitted a certification, as specified in 728.107(b)(5), with each shipment of hazardous waste or treatment residue to the land disposal facility? Yes___ No___ N/A ✓	728.107(b)(5)
728.107(b)(6)	If the waste or treatment residue will be further managed at a different treatment or storage facility, is the treatment facility sending the waste complying with the notice and certification requirements of Section 728.107(a)? Yes ✓ No___ N/A___	728.107(b)(6)

Regulation	RCRA LDR INSPECTION CHECKLIST (PART 728)	Violation
728.107(b)(7)	Has the recycling facility that is making off-site shipments of recyclable materials used in a manner constituting disposal: – submitted to the Agency a notice and certification with each shipment in accordance with 728.107(b)(4) and (b)(5)? Yes ✓ No___ N/A___ – kept records of the name and location of each entity receiving the hazardous waste-derived product? Yes ✓ No___ N/A___	728.107(b)(7)
728.107(c)	Has the owner/operator of any land disposal facility disposing of any restricted waste, except where the waste being disposed of is a recyclable material used in a manner constituting disposal: 1) maintained copies of the notice and certification specified in subsection 728.107(a) or (b)? Yes___ No___ N/A ✓ 2) tested the waste to ensure that it is in compliance with applicable treatment standards or prohibitions? Yes___ No___ N/A ✓	728.107(c)
728.107(c)(4)	**Note:** If the owner/operator is disposing of any waste that is a recyclable material used in a amanner constituting disposal, the owner/operator is not subject to the subsections (c)(1) and (c)(2) with respect to such waste.	
728.107(d)	Has the generator or treater who first claims that their hazardous debris is excluded from the definition of a hazardous waste under Section 728.103(f)(2) provided the following notification and certification: 1) a one-time notification submitted to the Agency including the following information: A) the name and address of the RCRA Subtitle D facility receiving the treated debris? Yes___ No___ N/A ✓ B) a description of the hazardous debris as initially generated including the applicable USEPA hazardous waste number(s)? Yes___ No___ N/A ✓ C) for debris excluded under Section 728.103(f)(2), the technology from Section 728, Table F? Yes___ No___ N/A ✓ 2) Has the notification been updated if the debris is shipped to a different facility or if a different technology is used to treat the debris? Yes___ No___ N/A ✓ 3) For debris excluded under Section 728.103(f)(2), has the owner/operator of the treatment facility documented and certified compliance with the treatment standards of Section 728, Table F pursuant to this Subsection? Yes___ No___ N/A ✓	728.107(d)
	Section 728.109: Special Rules for Characteristic Wastes	
728.109(a)	Has the generator determined each USEPA hazardous waste code applicable to the waste in order to determine the applicable treatment standards under Subpart D? Yes ✓ No___ N/A___	728.109(a)
	Note: For purposes of this Part, the waste will carry the waste code for any applicable listing under Part 721, Subpart D and one or more of the waste codes under Part 721, Subpart C where the waste exhibits the relevant characteristic, except in the case when the treatment standard for the Subpart D waste code operates in lieu of the standard for the Subpart C waste code as specified in subsection (b).	
728.109(b)	Does the waste meet the treatment standards for all applicable listed and characteristic waste codes? Yes ✓ No___ N/A___	728.109(b)
	Note: Where a prohibited waste is both listed and characteristic, the treatment standard for the listed waste code will operate in lieu of the standard for the characteristic waste code, provided that the treatment standard for the listed waste includes a treatment standard for the constituent that causes the waste to exhibit the characteristic.	

Regulation		Violation
728.109(c)	Has the generator land disposed any prohibited waste which exhibits a characteristic under Part 721, Subpart C only if the waste complies with the treatment standards under Part 728, Subpart D (in addition to any applicable standards determined from the initial point of generation)? Yes____ No____ N/A ✓	728.109(c)
728.109(d)	1) Has the generator sent the required notification and certification to the appropriate Agency for each shipment of waste that no longer exhibits the characteristic to a Subtitle D landfill? Yes____ No____ N/A ✓ Does the notification include the following information: A) name and address of the non–hazardous waste facility receiving the shipment? Yes____ No____ N/A ✓ B) description of the waste as initially generated, including USEPA hazardous waste number(s), applicable wastewater or nonwastewater category and the subdivisions made within a waste code based on waste specific criteria (such as D003, reactive cyanides)? Yes____ No____ N/A ✓ C) treatment standards applicable to the waste at the initial point of generation? Yes____ No____ N/A ✓ 2) Has the certification been signed by an authorized representative and is the language stated as required in Section 728.107(b)(5)(A)? Yes____ No____ N/A ✓	728.109(d)
	Subpart C: Prohibition on Land Disposal	
	Section 728.130: Waste Specific Prohibitions -- Solvent Wastes	
728.130	Has the generator of a spent solvent waste (F001–F005) land disposed the waste only after having: 1) met the treatability standards of Part 728, Subpart D; or Yes____ No____ N/A ✓ 2) been granted an exemption from a prohibition pursuant to a petition under Section 728.106; or Yes____ No____ N/A ✓ 3) been granted an extension to the effective date of prohibition pursuant to Section 728.105? Yes____ No____ N/A ✓	728.130
	Section 728.131: Waste Specific Prohibitions -- Dioxin–Containing Wastes	
728.131	Has the generator of a dioxin–containing waste (F020, F021, F022, F023, F026, F027 or F028) land disposed the waste only after having: 1) met the treatability standards of Part 728, Subpart D; or Yes____ No____ N/A ✓ 2) been granted an exemption from a prohibition pursuant to a petition under Section 728.106; or Yes____ No____ N/A ✓ 3) been granted an extension to the effective date of prohibition pursuant to Section 728.105? Yes____ No____ N/A ✓	728.131
	Section 728.132: Waste Specific Prohibitions -- California List Wastes	
728.132	Has the generator of a California List Waste land disposed the waste only after having: 1) been granted an adjusted standard from a prohibition pursuant to a petition under Section 728.106 (except for liquid hazardous waste containing PCBs at concentrations greater than or equal to 500 ppm which are not elegible for exemptions; or Yes____ No____ N/A ✓ 2) been granted an extension to the effective date of prohibition pursuant to Section 728.105? Yes____ No____ N/A ✓ 3) met the applicable treatment standards specified in Subpart D, or, where treatment standards are not specified, the wastes are in compliance with the applicable prohibitions set forth in this Section or Section 728.139? Yes____ No____ N/A ✓	728.132

Regulation	RCRA LDR INSPECTION CHECKLIST (PART 728)	Violation
	Section 728.133: Waste Specific Prohibitions -- First Third Wastes	
728.133	Has the generator of a first third waste land disposed the waste only after having:	
	1) met the treatability standards of Part 728, Subpart D; or Yes____ No____ N/A ✓	728.133
	2) been granted an adjusted standard pursuant to Section 728.106; or Yes____ No____ N/A ✓	
	3) been granted an extension to the effective date of prohibition pursuant to Section 728.105? Yes____ No____ N/A ✓	
728.133(g)	Has the generator of a first third waste tested the waste or used knowledge of the waste to determine whether it exceeds the applicable treatment standards? Yes____ No____ N/A ✓	728.133(g)
	Section 728.134: Waste Specific Prohibitions -- Second Third Wastes	
728.134	Has the generator of a second third waste land disposed the waste only after having:	
	1) met the treatability standards of Part 728, Subpart D; or Yes____ No____ N/A ✓	728.134
	2) been granted an extension to the effective date of prohibition pursuant to Section 728.105; or Yes____ No____ N/A ✓	
	3) been granted an exemption pursuant to Section 728.106? Yes____ No____ N/A ✓	
728.134(i)	Has the generator of a second third hazardous waste tested the waste or used his knowledge of the waste to determine whether it exceeds the applicable treatment standards of 728.141 or 728.143? Yes____ No____ N/A ✓	728.134(i)
	Section 728.135: Waste Specific Prohibitions -- Third Third Wastes	
728.135	Has the generator of a third third waste land disposed the waste only after having:	
	1) met the treatability standards of Part 728, Subpart D; or Yes____ No____ N/A ✓	728.135
	2) been granted an exemption from a prohibition pursuant to a petition under Section 728.106; or Yes____ No____ N/A ✓	
	3) met the applicable alternate standards established pursuant to a petition granted under Section 728.144; or Yes____ No____ N/A ✓	
	4) been granted an extension to the effective date of a prohibition pursuant to Section 728.105? Yes____ No____ N/A ✓	
728.135(j)	Has the generator of a third third waste listed in 728.110, 728.111 or 728.112 tested the waste or used his knowledge of the waste to determine whether it exceeds the applicable treatment standards of Sections 728.141 or 728.143? Yes ✓ No____ N/A____	728.135(j)
	Section 728.139: Statutory Prohibitions	
728.139	Has a person caused, threatened or allowed the land disposal of any waste in violation of Section 3004 of RCRA? Yes____ No____ N/A ✓	728.139
	Subpart E: Prohibitions on Storage	
	Note: Except as provided in this section, the storage of hazardous wastes restricted from land disposal under Subpart C is prohibited.	
	Section 728.150: Prohibitions on Storage of Restricted Wastes	
728.150(a)(1)	Has the generator stored restricted wastes in tanks or containers on-site solely for the accumulation of such quantities as necessary to facilitate proper recovery, treatment or disposal? Yes ✓ No____ N/A____	728.150(a)(1)
	Has the generator complied with the requirements of Section 722.134? Yes ✓ No____ N/A____	

Regulation	RCRA LDR INSPECTION CHECKLIST (PART 728)	Violation
	Note: A generator in existence on the effective date of regulation under this Part and who must store hazardous wastes for more than 90 days due to regulations under this Part becomes a TSD and must obtain a RCRA permit.	
728.150(a)(2)	Has the owner/operator of a TSD stored restricted wastes in tanks or containers solely for the accumulation of such quantities of hazardous waste to facilitate proper recovery, treatment or disposal? Yes ✓ No___ N/A___ If yes, has the owner/operator: A) clearly marked each container to identify its contents and the accumulation start date? Yes ✓ No___ N/A___ B) clearly marked each tank to identify its contents, recorded the quantity of each hazardous waste received and indicated the accumulation start date, all in accordance with the operating record requirements of 724.173 or 725.173? Yes ✓ No___ N/A___	728.150(a)(2)
728.150(a)(3)	Has the transporter stored manifested shipments of such wastes at a transfer facility for 10 days or less? Yes___ No___ N/A ✓	728.150(a)(3)
728.150(b)	Has the owner/operator of a TSD stored restricted wastes up to one year solely for accumulation of such quantities of hazardous waste as necessary to facilitate proper recovery, treatment or disposal? Yes___ No___ N/A ✓	728.150(b)
728.150(c)	Has the owner/operator of a TSD who has stored such wastes beyond one year proved that such storage was solely for the accumulation of such quantities of hazardous waste to facilitate proper recovery, treatment or disposal? Yes___ No___ N/A ✓	728.150(c)
	Note: If a generator's waste is exempt from a prohibition on the type of land disposal utilized for the waste (e.g. case–by–case extension, incorporated by reference or an approved petition) the prohibition in subsection (a) does not apply during the period of such exemption.	
	Note: The prohibition in subsection (a) does not apply to hazardous wastes that meet the treatment standards (728.141, 728.142 and 728.143), or the adjusted treatment standards (728.144) or where the treatment standards have not been specified, is in compliance with the applicable prohibitions in 728.132 or 728.139.	
728.150(f)	Have liquid hazardous wastes containing PCBs at concentrations greater than 50 ppm been stored at a facility that meets the requirements of 40 CFR 261.65(b) and have they been removed from storage and treated or disposed as required by this Part within one year of the date when such wastes were first placed into storage? Yes___ No___ N/A ✓	728.150(f)
	Note: The provisions of subsection (c) do not apply to such PCB wastes prohibited under Section 728.132.	
	COMMENTS:	

Illinois Environmental Protection Agency
Division of Land Pollution Control

RCRA INSPECTION REPORT

USEPA #: IL D005450697		IEPA #: 0316000053	
Facility Name: Safety-Kleen Corporation Chicago RC		Phone #: 312/247-2828	
Street Address: 1445 West 42nd Street		County: Cook	
City: Chicago	State: IL	Zip: 60609	
Region: 2	Inspection Date: 7 / 27 / 94	From: 9:00AM	To: 11:30AM
Weather:			

TYPE OF FACILITY

Notified As: G, Trans, TSD, WAF, OSF	Regulated As: G, S, WAF
LDF? (Yes or No) No HPV? No	90-Day F/U Required?: YES ____ NO XXX

TYPE OF INSPECTION

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

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

NON-REGULATED STATUS N/A

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

PART A

Notification Date: 8 / 5 / 80 , from (initial) or (subsequent) Notification.

Initial Part A Date: 11 / 19 / 80 Amended: 9 / 24 / 90

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

PART B PERMIT APPLICATION

Part B Permit Submitted: (Y) or N 11 / 19 / 88 Final Permit Issued: 9 / 30 / 92

ENFORCEMENT N/A

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

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

ORDERS ISSUED N/A

CACO: ___ / ___ / ___ CAFO: ___ / ___ / ___ Consent Decree: ___ / ___ / ___

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

TSD FACILITY ACTIVITY SUMMARY

Activity by Process Code	On Part A?	Activity Conducted Prior to 1980?	Was Activity Ever Done?	Closed	Being done at Time of Insp.?	Exempt per 35 IAC, Sec.	On Annual Report 1993	1992	1991
S01	Yes	Yes	Yes	No	Yes	N/A	Yes	Yes	Yes
S02	Yes	Yes	Yes	No	Yes	N/A	Yes	Yes	Yes
R03	N/A	Yes	Yes	N/A	Yes	725.101(c)(b)	No	No	No

RECEIVED
AUG 08 1994
IEPA-DLPC

IL 532-1834

OWNER		OPERATOR	
Name	Safety-Kleen Corporation	Name	Safety-Kleen Corp. Chicago RC
Address	1000 North Randell Road	Address	1445 W. 42nd Street
City	Elgin	City	Chicago
State	IL Zip 60123	State	IL Zip 60609
Phone #	708/697-8460	Phone #	312/247-2828

PERSON(S) INTERVIEWED	TITLE	PHONE #
Alfred Aghapour	Facility Manager	312/247-2828
Ted Zajack	Operations Manager	312/247-2828

INSPECTION PARTICIPANT(S)	AGENCY/TITLE	PHONE #
Anna Van Orden	IEPA/EPS	708/338-7900

PREPARED BY	AGENCY/TITLE	PHONE #
Anna Van Orden	IEPA/EPS	708/338-7900

SUMMARY OF APPARENT VIOLATIONS

Area	Class	Section

Area	Class	Section

Area	Class	Section

RECEIVED
AUG 08 1994
IEPA-DLPC

IL 532-1835

Safety-Kleen Corp. Chicago RC
0316000053 ILD005450697
January 26, 1994

NARRATIVE

The Safety-Kleen Chicago RC(SKCRC) is an organic chemicals reclamation and recycling facility permitted to treat and store hazardous waste under a Part B Permit.

The SKCRC accepts organic chemicals and solvent wastes from industrial and commercial facilities. Reclamation and recycling operations involve either regeneration of the spent solvent or blending and processing of the material for use as a hazardous waste fuel.

Processes utilized in the reclamation of used solvents, solvent mixtures and other solvent containing wastes include neutralization, distillation, fractionation, liquid-liquid extraction and drying.

SKCRC handles primarily two accounts:

1) The Toll Business - The toll customer (generally industrial accounts) ships waste or off-specification material to the SKCRC for treatment. The facility reclaims the material to the customer's specifications and returns the material to the generator.

2) The Recycling Business - The recycling business consists of industrial solvents which come to the SKCRC from Safety-Kleen sales network. These waste materials are recycled at the facility to Safety-Kleen corporate specifications and the processed material is sold as product on the market.

HAZARDOUS WASTE UNITS

TYPE	ACTIVE	CLOSED	WASTES	SIZE/ CAPACITY	(D)IKED;(C)ONCRETE/DIR(T)/ (G)RAVEL FLOOR;TYPE OF SECONDARY CONTAINMENT
SO1	Y	N	Numerous, See Part B	108,900 Gallons	D; C; Catch Basin
SO2	Y	N	Numerous, See Part B	1,119,865 Gallons	D; C; Vault w/coating on concrete

RECEIVED
AUG 08 1994
IEPA-DLPC

HAZARDOUS WASTES

Still Bottoms - F001, F002, F003, F005
- Residual material from the distillation process
- Rate of generation: 25,000 - 50,000 gal/month
- Shipped to Safety-Kleen in Clarksville, MO for fuel blending or reclamation.
- Amount on site: 22,031 gallons

Misc. Drummed Waste & Waste Filters - F001, F002, F003, F005
- Waste generated by various methods:
  - Cleaning out tanks
  - Used oil dry
  - Hose drippings
  - Cut drums in order to remove solid material
  - Used filters from filtering material from waste and product tanks
- Rate of generation: 30 - 45 drums/month
- Shipped to Safety-Kleen in Hebron, OH for fuel blending/ reclamation or further treatment.
- Amount on site: 96/55 gallon drums

Remanifasted Waste - F001, F002, D001
- Waste generated not intended for reclamation on site but is stored temporarily until it is sent off-site for reclamation. Also, waste shipped to facility in error.
- Rate of generation: <5,000 gal/month
- Shipped to Safety-Kleen in Dolton, IL for fuel blending or further reclamation. (Last shippment 7/7/93)
- Amount on site: 0

Spent Solvent - F005, D001
- Waste generated from two parts washers and one immersion cleaner unit.
- Rate of generation: 30 gal/month
- Shipped to Safety-Kleen in Dolton, IL for reclamation.
- Amount on site: 0

OBSERVATIONS

Facility has submitted completed Phase I RFI Report to the Agency on July 1, 1994.

At the time of the inspection, this facility was regulated as a generator, treatment, storage facility and marketer of hazardous waste fuel. The facility appeared to be in compliance with all applicable RCRA regulations and their Part 3 Permit requirements.

RCRA Part B Inspection Site # 0316000053

Section I: Containers

	Compliance	
A. Hazardous Waste Management Units	(YES)	NO
B. Waste Identification	(YES)	NO
C. Condition of Containers	(YES)	NO
D. Compatibility of Containers	(YES)	NO
E. Management of Containers	(YES)	NO
F. Inspections	(YES)	NO
G. Containment	(YES)	NO
H. Ignitable or Reactive Wastes	(YES)	NO
I. Special Requirements for Incompatible Wastes	(YES)	NO
J. General Operating Requirements	(YES)	NO
K. Closure Requirements	(YES)	NO

Description of violation: _____

_____

_____

_____

_____

_____

Section II: Tank Systems

	Compliance	
B. Waste Identification	(YES)	NO
C. Containment and Detection of Releases	(YES)	NO
D. General Construction Requirements	(YES)	NO
E. General Operating Requirements	(YES)	NO
F. Tank System Certification	(YES)	NO
G. Response to Leaks or Spills	(YES)	NO

Section II: Tank Systems (continued)

	Compliance	
H. Inspections	(YES)	NO
I. Reporting and Recordkeeping	(YES)	NO
J. Ignitable and Reactive Wastes	(YES)	NO
K. Special Requirements for Incompatible Wastes	(YES)	NO
L. Closure	(YES)	NO

Description of violations: _____

Section III: Reporting and Notification Requirements

	Compliance	
Containers	(YES)	NO
Tank Systems	(YES)	NO
Corrective Action	(YES)	NO
Standard Conditions	(YES)	NO
Additional Special Conditions	(YES)	NO

Description of violations: _____

Section IV: Corrective Action

	Compliance	
E. Financial Assurance for Corrective Action	(YES)	NO
F. Notification Requirements for and Assessment of Newly-Identified Solid Waste Management Unit(s)	(YES)	NO
G. Future Releases from SWMUs	(YES)	NO
H. Completion of Corrective Action	(YES)	NO

Description of violations: _____

Section V: Standard Conditions

	Compliance	
A. General Requirements	(YES)	NO
B. General Facility Standards	(YES)	NO
C. Preparedness and Prevention	(YES)	NO
D. Contingency Plan	(YES)	NO
E. Manifest System, Recordkeeping and Reporting	(YES)	NO
F. Closure	(YES)	NO
G. Land Disposal Restrictions	(YES)	NO

Description of violations: _____

WASTE I[illegible]POSITION [illegible]M

Facility Na[illegible]

USEPA # IL

IEPA #:

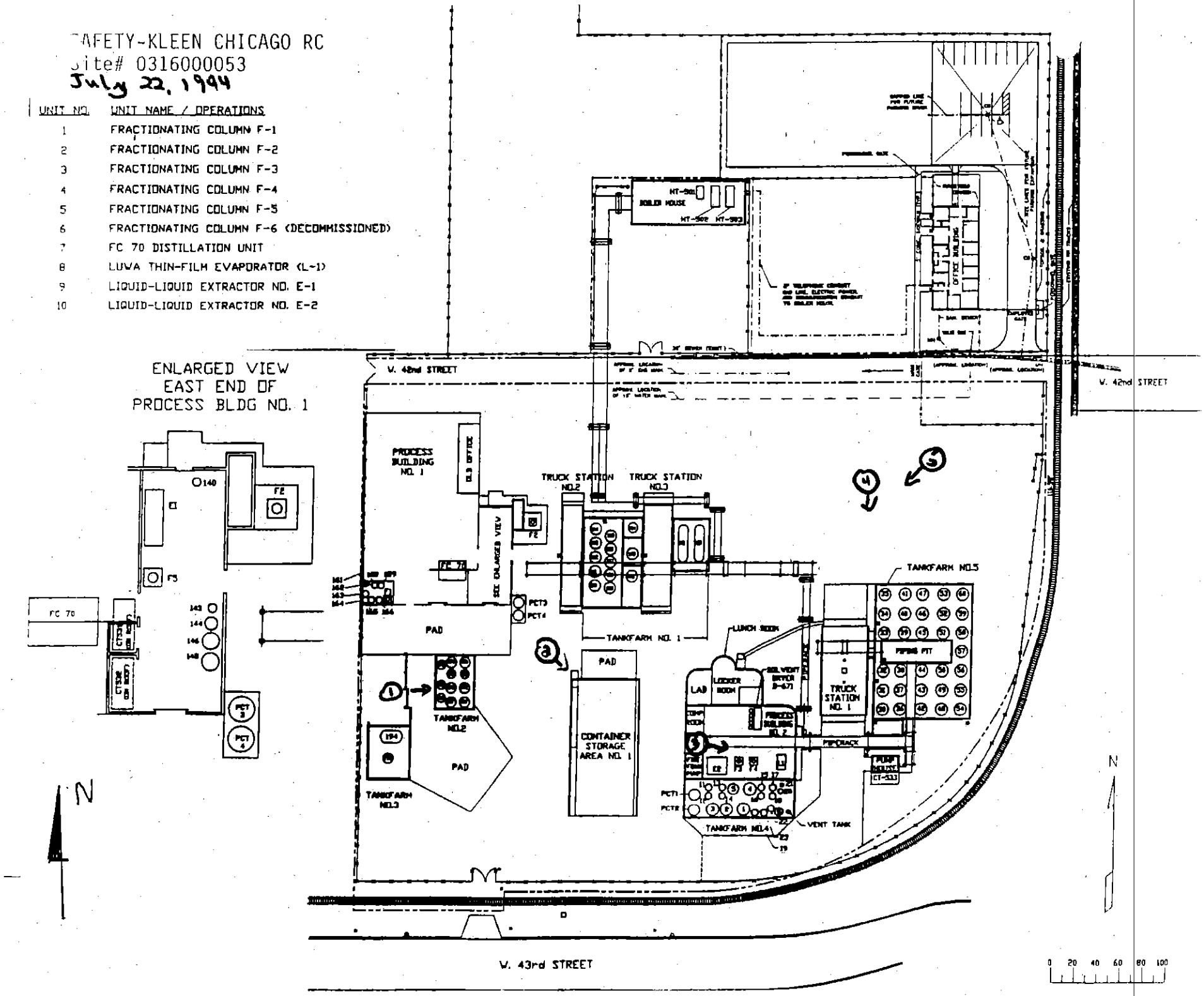
Waste Name (include haz & waste for which no determination has been made)	Generating Process (For waste gen. on site. N/A for TSD)	Date of Last Anal[illegible]	USEPA Haz Waste #	• On 8700-12	• On 3510-3	• 19 93	• 19 92	• 19 91	Amount on Site	Rate of Generation	Last Manifested Shipment	Disposition
STILL BOTTOMS	RESIDUAL MATERIAL FROM DIST. PROCESS.	EVERY SHIPMENT	F001 F002 F003 F005	Y	Y	G / F	G / F	G / F	22,030 gal	25,000 - 50,000 gal month	7/22/94	SAFETY - KLEEN CLARKSVILLE, MO.
SPENT SOLVENT	2 PARTS WASH. 1 IMMERSION CLEANER	↓	F005 D001	Y	Y	G / F	G / F	G / F	Ø	30 gal month.	7/12/94	SAFETY - KLEEN DOLTON, IL
REMANIFESTED WASTE	ERRORS TEMP. STORAGE		F001 F002 D001	Y	Y	G / F	G / F	G / F	Ø	Approx. 5,000 gal/mt.	7/7/93	SAFETY - KLEEN CLARKSVILLE, MO.
MISC. DRUM WASTE WASTE FILTERS	- TANK cleanings - used oil dry - Hose drippings - used filters		F001 F002 F003 F005	Y	Y	G / F	G / F	G / F	86 Drums	30-45 Drums month	12/16/93	SAFETY - KLEEN HEBRON, OH
						G / F	G / F	G / F				
						G / F	G / F	G / F				
						G / F	G / F	G / F				
						G / F	G / F	G / F				
						G / F	G / F	G / F				
						G / F	G / F	G / F				

RECEIVED
AUG 0 8 1994
IEPA-DLPC

* All "NO" responses must be explained in narrative

SAFETY-KLEEN CHICAGO RC
Site# 0316000053
July 22, 1994

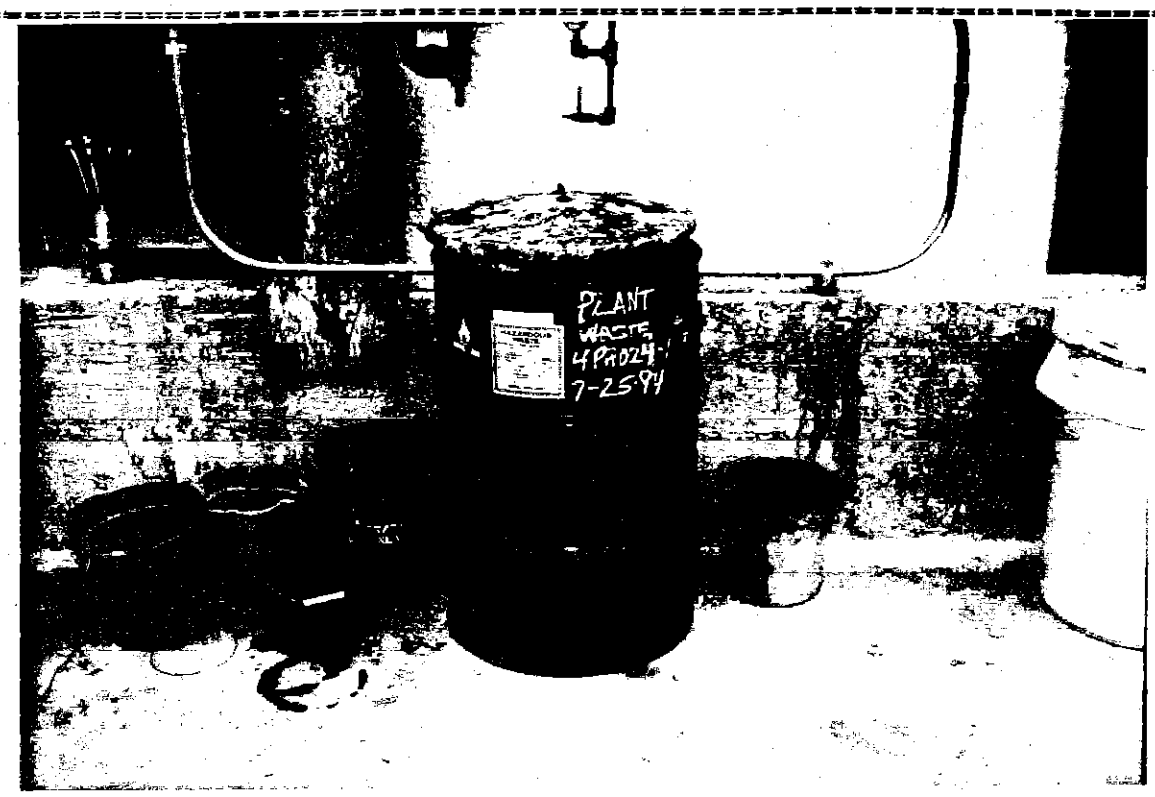
UNIT NO.	UNIT NAME / OPERATIONS
1	FRACTIONATING COLUMN F-1
2	FRACTIONATING COLUMN F-2
3	FRACTIONATING COLUMN F-3
4	FRACTIONATING COLUMN F-4
5	FRACTIONATING COLUMN F-5
6	FRACTIONATING COLUMN F-6 (DECOMMISSIONED)
7	FC 70 DISTILLATION UNIT
8	LUWA THIN-FILM EVAPORATOR (L-1)
9	LIQUID-LIQUID EXTRACTOR NO. E-1
10	LIQUID-LIQUID EXTRACTOR NO. E-2



Illinois Environmental Protection Agency Photographs

Site Name: Safety- Kleen Chicago Recycle Center IEPA #: 0316000053

Date: July 27, 1994 Time: 9:00AM - 11:30AM Photograph By: Anna Van Orden AVO



Comments: FACING EAST- SATELLITE ACCUMULATION AREA.

Roll #: 95-032 Photo #: 1

Comments: FACING SOUTHEAST - CONTAINER STORAGE AREA.

Roll #: 95-032 Photo #: 2

Illinois Environmental Protection Agency Photographs

Site Name: Safety- Kleen Chicago Recycle Center IEPA #: 0316000053

Date: July 27, 1994 Time: 9:00AM - 11:30AM Photograph By: Anna Van Orden (AVO)

Comments: FACING SOUTHEAST - LIQUID-LIQUID EXTRACTION AREA.

Roll #: 95-032 Photo #: 3

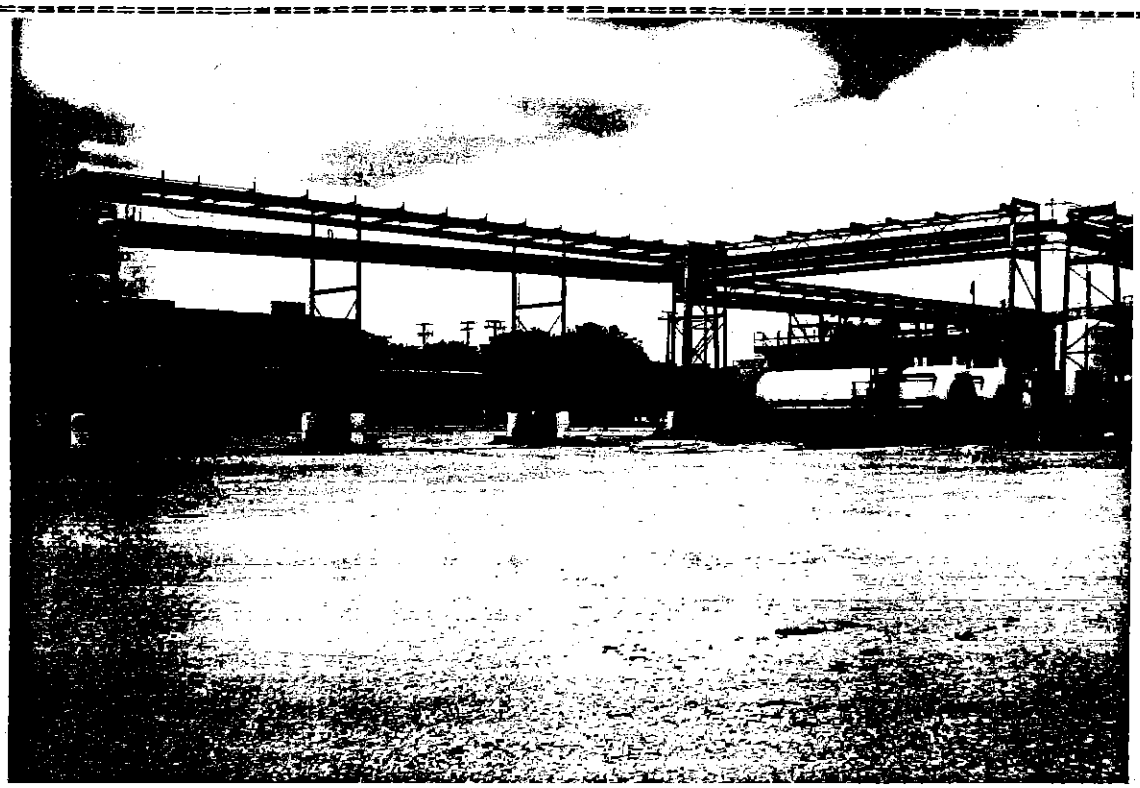
Comments: FACING SOUTH - TANK FARM #5 and Truck STATION #1.

Roll #: 95-032 Photo #: 4

Illinois Environmental Protection Agency Photographs

Site Name: Safety- Kleen Chicago Recycle Center IEPA #: 0316000053

Date: July 27, 1994 Time: 9:00AM - 11:30AM Photograph By: Anna Van Orden (AVO)



Comments: FACING SOUTHWEST - NEW LAB BUILDING AND ON THE RIGHT PRODUCT TANKS. Roll #: 95-032 Photo #: 5

Comments:

Roll #: 95-032 Photo #:

0316000053
July 27, 1994

Area	Class	90 Day FU Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comments
				PART 722 **GENERATOR STANDARDS** **Subpart A: General**				
OTH	1			**Section 722.111: Hazardous Waste Determination**	✓			
				Has the generator determined if the solid waste it generates is a hazardous waste? Yes ✓ No ___				
				Did the generator follow the procedures specified in this section in making its determination? Yes ✓ No ___				
OTH	1			**Section 722.112: USEPA Identification Number**	✓			
			a	Has the generator obtained a USEPA identification number? Yes ✓ No ___				
			c	Has the generator offered his hazardous waste only to transporters or to treatment, storage or disposal facilities that have received a USEPA identification number? Yes ✓ No ___				

Area	Class	90 Day F.O. Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks of Comment No.
MAN	2			**Section 722.121: Acquisition of Manifests**	✓			
			a	Did the generator use the manifest supplied by the Agency for hazardous waste going for treatment, storage or disposal in Illinois? Yes ✓ No ___ N/A ___				
			b	For hazardous waste going outside Illinois for treatment, storage or disposal, has the generator used the manifest supplied by the Agency if the State to which the hazardous waste is being shipped does not supply and require the completion of its own State manifest? **or** For hazardous waste going outside Illinois for treatment, storage or disposal, has the generator used the manifest required by the State to which the hazardous waste is being shipped? Yes ✓ No ___ N/A ___				
MAN	2			**Section 722.122: Number of Copies** Does the manifest the generator is using consist of at least six copies (plus one copy for each additional transporter)?	✓			
MAN	2			**Section 722.123: Use of the Manifest** For each manifest received, has the generator: 1) Signed the certificate by hand? Yes ✓ No ___ 2) Obtained the handwritten signature and the date of acceptance by the initial transporter? Yes ✓ No ___	✓			

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks
				PART 722 **GENERATOR STANDARDS** **Subpart C: Pre-Transport Requirements**				No waste ready for transportation off-site.
OIII	1	X		**Section 722.130: Packaging** Is waste which is ready for transportation off-site packaged in accordance with 49 CFR, Parts 173, 178 and 179?			✓	
OIII	1	X		**Section 722.131: Labeling** Is each package of hazardous waste which is ready for transportation off-site labeled in accordance with 49 CFR Part 172?			✓	
OIII	1	X		**Section 722.132: Marking**			✓	
			a	Is each package of hazardous waste which is ready for transportation off-site marked in accordance with 49 CFR Part 172? Yes ___ No ___				
			b	Is each package of hazardous waste which is ready for transportation off-site marked with: - The generator's name and address? Yes ___ No ___ - The manifest document number associated with the container? Yes ___ No ___ - The words "Hazardous Waste - Federal Law Prohibits Improper Disposal. If found contact the nearest police, or public safety authority or the U.S. Environmental Protection Agency"? Yes ___ No ___				

Area	Class	90 Day F.U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment Nu
OTH	1	X		**Section 722.134: Accumulation Time**			✓	
				NOTE: A generator who is also a TSD would be subject to this section for any waste which is not identified for storage on the facility's Part A, or which is being accumulated outside a "permitted" storage area.				
			a1	For waste in containers, has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subpart I?				
				and/or				
				For waste in tanks, has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subpart J except Section 725.297(c) and 725.300? Yes ____ No ____				
			a2	For waste in containers, has the generator marked and made visible for inspection on each container, the date upon which accumulation began? Yes ____ No ____ N/A ____				
			a3	For waste in containers and tanks, has the generator marked or labeled each with the words "Hazardous Waste"? Yes ____ No ____				
			a4	Has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subparts C and D, and Section 725.116? Yes ____ No ____				

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No
			c1	**SATELLITE ACCUMULATION** Is the generator who accumulates hazardous waste in containers at or near any point of generation where wastes initially accumulate and which is under the control of the operator of the process generating the waste: - Limiting such accumulation to 55 gallons (one quart of acutely hazardous waste listed in 35 Ill. Adm. Code 721.133)? Yes ✓ No ___ N/A ___ - Complying with the requirements of: 1) 35 Ill. Adm. Code 725.271, Condition of Containers? Yes ✓ No ___ 2) 35 Ill. Adm. Code 725.272, Compatibility of Waste with Containers? Yes ✓ No ___ 3) 35 Ill. Adm. Code 725.273(a), Management of Containers - requiring that the containers be stored closed except when waste is being added or removed? Yes ✓ No ___ - Marking the containers with the words "Hazardous Waste" or with words that identify the contents of the containers? Yes ✓ No ___				

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			**PART 722** **GENERATOR STANDARDS** **Subpart D: Recordkeeping and Reporting** **Section 722.140: Recordkeeping**	✓			
				Has the generator retained for a period of three years:				
			a	- A copy of each signed manifest? Yes ✓ No ___				
			b	- A copy of each annual report? Yes ✓ No ___				
			b	- A copy of each exception report? Yes ___ No ___ N/A ✓				
			c	- Copies of test results, waste analyses or other determinations made in accordance with Section 722.111? Yes ✓ No ___ N/A ___				
			d	Does a generator who is involved in any unresolved enforcement action continue to maintain the records required in 722.140(a) thru (c)? Yes ___ No ___ N/A ✓				
			d	If the Director has requested that the records required in 722.140(a) thru (c) be maintained for a period longer than three years, has the generator continued to maintain them? Yes ___ No ___ N/A ✓				

H 532-1502

Area	Class	90 Day F U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No
				- A cover letter signed by the generator or his authorized representative explaining the efforts taken to locate the hazardous waste and the results of those efforts? Yes ____ No ____ N/A ____				
OTH	1			**Section 722.143: Additional Reporting** Has the generator submitted all additional reports concerning quantities and disposition of wastes as required by the Director?			✓	None required

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment (s)
MAN	1			**PART 722** **GENERATOR STANDARDS** **Subpart F: Imports of Hazardous Waste** **Section 722.160: Imports of Hazardous Waste**			✓	No Imports of H.W.
			b1	Has the person importing hazardous waste met the manifest requirements of Section 722.120 except that: In place of the generator's name, address and USEPA identification number, the name and address of the foreign generator and the importer's name, address and USEPA identification number are used; **and**				
			b2	Has the importer or his agent signed the manifest in place of the generator; **and**				
			b2	Has the importer or his agent obtained the signature of the initial transporter? Yes ____ No ____ N/A ____				
			c	Is the person importing hazardous waste using manifests obtained from the Agency? Yes ____ No ____				

11 537 1587

Area	Class	90 Day FU Req	Key FU / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No
				PART 726 **STANDARDS FOR THE MANAGEMENT OF SPECIFIC HAZARDOUS WASTE AND SPECIAL TYPES OF HAZARDOUS WASTE MANAGEMENT FACILITIES** **Subpart D: Hazardous Waste Burned for Energy Recovery** **NOTE: Facilities that burn hazardous waste for energy recovery (excluding Subpart O incinerators) are subject to this subpart. However, used oil which has a hazardous characteristic is not regulated under Subpart D, but rather Subpart E. Materials identified in 721.104 and 721.106(a)(3)(E) through (I), and hazardous waste subject to 721.105 (SQG) are exempt from this subpart.**				
OTH		X		**Section 726.132: Standards Applicable to Generators of Hazardous Waste Fuel**	✓			
	I		a	Is the generator in compliance with 722 requirements (complete and attach the GEN or RR GEN checklist)? Yes ✓ No ___ N/A ___				
OTH				**Section 726.133: Standards Applicable to Transporters of Hazardous Waste Fuel**			✓	NOT A TRANSPORTER
	I			Is the transporter in compliance with 723 requirements (complete and attach the TR checklist)? Yes ___ No ___ N/A ✓				
OTH		X		**Section 726.134: Standards Applicable to Marketers of Hazardous Waste Fuel**	✓			
OTH	II		a	Is the marketer marketing hazardous waste fuel only to persons who have notified USEPA of their hazardous waste fuel activities and have obtained a USEPA identification number? Yes ✓ No ___ N/A ___				
				and				

Area	Class	90 Day F U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No
OTH				**Section 726.135: Standards Applicable to Burners of Hazardous Waste Fuel**			✓	FACILITY DOES NOT BURN H.W. FUEL
	I		a	Is the owner of an industrial furnace or boiler complying with the prohibitions in Section 726.131(b)? Yes ___ No ___ N/A ___				
	II		b	Has the USEPA been re-notified as to the burner's hazardous waste fuel activities? Yes ___ No ___ N/A ___				
	I		c	Does the burner accumulate/store hazardous waste fuel for a time period exceeding 90 days? Yes ___ No ___				
				NOTE: If "Yes", then the facility is subject to 702, 703, and 725 A through L (or 724 A through L for new facilities) and the appropriate checklist(s) must be completed. If "No", the facility must comply with 722.134 Accumulation Time.				
	I		c	Is the facility in compliance with 722.134? Yes ___ No ___ N/A ___				
	II		d	Prior to receiving the first shipment of hazardous waste fuel from a marketer, has the owner or operator of the industrial furnace or boiler provided the certification required in Sec. 726.135(d)? Yes ___ No ___ N/A ___				
	II		e	Has the burner kept a copy, for three years, of each certification notice that was sent to the marketers? Yes ___ No ___ N/A ___				

RCRA LAND DISPOSAL RESTRICTIONS INSPECTION

I. General Information

Facility: SAFETY-KLEEN CORP. CHICAGO RE.

U.S. EPA ID No.: ILD005450 69 0316000053

Street: 1445 W. 42nd Street

City: Chicago State: IL Zip: 60609

Telephone: 312/247-2829

Inspection Date: 7 27 94 Time: 9:00-11:30 (am/pm)

Weather Conditions:

	Name	Agency/Title	Telephone
Inspectors:	Anna Van Orden	IEPA/EPS	708/338-7900
Facility Representatives:	Alfred Aghapour - Facility Mgr.		312/247-2828

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

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

* See Appendix A

RCRA LAND DISPOSAL RESTRICTIONS INSPECTION

II. WASTE IDENTIFICATION

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

1. F001 through F005 spent solvents:
   F001 F002 F003 F005

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

3. California List Wastes (See Appendix A):
   Spent Solvents

4. First Third Wastes [40 CFR 268.10]:

5. Second Third Wastes [40 CFR 268.11]:

6. Third Third Wastes [40 CFR 268.12]**:
   D001

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

B. Waste Code Determination

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

   Yes ✓ No___

   If no, list below:

Assigned Classification	Correct Classification

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

Comments:

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

Yes ___ No ___ List _____

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

Yes ___ No ___ List _____

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

Yes ___ No ___ List _____

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

Yes ___ No ___ List _____

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

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

Yes ___ No ___ List _____

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

Yes ___ No___ List _____

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

RCRA LAND DISPOSAL RESTRICTION INSPECTION

III. GENERATOR REQUIREMENTS

A. Treatability Group/Treatment Standard Identification*

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

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

Yes ✓ No ___ NA ___

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

Waste Code	Wastewater*	Nonwastewater
F001	___	✓
F002	___	✓
F003	___	✓
F005	___	✓

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

Comments _____

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

Yes ___ No ___ NA ✓

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

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

Comments _____

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

3. First, Second, and Third Third Wastes:

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

Yes ✓ No ___ NA ___

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

Yes ___ No ___ NA ✓

If yes, check the appropriate treatability group:

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

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

Yes ___ No ___ NA ✓

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

Yes ___ No ___ NA ✓

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

Yes ___ No ___ NA ✓

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

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

Comments _____

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

Yes ___ No ✓ NA ___

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

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

Comments _____

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

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

Yes ___ No ___ NA ✓

*See Appendix C for exceptions.

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

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

Yes ___ No ___ NA ✓

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

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

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

Yes ___ No ✓ (If No, go to 4.)

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

Yes ___ No ___

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

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

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

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

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

Yes ___ No ___ NA ✓

C. **Management**

1. On-Site Management

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

Yes ✓ No ___

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

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

Comments_____

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

Yes ___ No ___ NA ✓

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

Yes ___ No ___ NA ✓

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

2. Off-Site Management: Waste Exceeds Treatment Standards

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

Yes ✓ No ___ (If No, go to 3.)

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

Waste Code	Receiving Facility
D001	S-K Dalton, IL
F001	S-K Franklin Park, IL
F002	SK Clarksville, MO
F003	Hebron, OH
F006	

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

Yes ___ No ___

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

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

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

Waste Code	Subsequent Handler
___	___
___	___
___	___

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

Yes ___ No ___

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

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

Complete the following table:

Waste Code	Receiving Facility
___	___
___	___
___	___

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

Yes ___ No ___

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

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

Yes ___ No ✓ (If No, go to 5.)

Complete the following table:

Waste Code	Receiving Facility
___	___
___	___
___	___

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

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

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

List types of waste treatment units and processes:

Waste Code	Type of Treatment	Treatment Units and Processes
F001 F002 F003, F005	Reclamation	Distillation Unit Wastewater Treatment Unit

2. Are treatment residuals generated from these units?

Yes ✓ No ___

Comments ___

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

Yes ✓ No ___ NA ___

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

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

RCRA LAND DISPOSAL RESTRICTION INSPECTION

IV. TSD REQUIREMENTS

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

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

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

Comments ___

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

Yes ___ No ___ NA ✓

3. What date was the waste analysis plan last revised? 9/27/90

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

Yes ✓ No ___

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

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

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

Yes ✓ No ___ NA ___

If analyses are conducted off site, identify lab: ___

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

Yes ___ No ___ NA ✓

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

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

Yes ___ No ___ NA ✓

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

C. Storage [40 CFR 268.50]

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

Yes ✓ No ___ (If No, go to 2.)

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

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

Yes ✓ No ___

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

Yes ___ No ✓ (If No, go to 2.)

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

Yes ___ No ___

If yes, state how: _____

2. Are prohibited wastes stored on site in tanks?

Yes ✓ No ___ (If No, go to 3.)

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

Yes ✓ No ___

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

Yes ✓ No ___ (If Yes, go to 3.)

4. Describe all other waste codes and treatment processes:

Waste Code	Treatment Processes
F001 F002	Distillation
F004 F005	Fractionation
D001	liquid-liquid extraction

5. Characteristic wastes:

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

Yes ✓ No ___

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

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

Yes ✓ No ___

Comments ___

6. Dilution Prohibition [40 CFR 268.3]:

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

Yes ___ No ✓ (If No, go to c.)

List the wastes ___

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

Yes ___ No ___

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

Yes ___ No ___

Comments ___

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

Yes ___ No ✓

Comments ___

Complete the following table:

Waste Code	Receiving Facility
F001,2,3,5	S-K Clarksville Mo + Hebron, OH
D001	SK Dolton - SK - Franklin Park, IL

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

Yes ✓ No ___

E. Surface Impoundments [40 CFR 268.4]

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

   Yes ___ No ✓ (If No, go to F.)

   List _____

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

   Yes ___ No ___

   Comments _____

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

   Yes ___ No ___

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

   Yes ___ No ___ NA ___

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

   Yes ___ No ___

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

   Yes ___ No ___

   Comments _____

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

Yes ___ No ___ NA___

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

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

Yes ___ No ___

If yes, at what frequency are analyses performed?_____

_____

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

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

List waste codes in appropriate category below:

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

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

Yes ___ No ___ NA ___

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

Yes ___ No ___ NA ___

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

Yes ___ No ___ NA ___

6. Are restricted wastes placed in underground injection wells?

Yes ___ No ___ List _____

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

Yes ___ No ___ NA ✓

4. Off-Site Management: Wastes Meets Treatment Standards

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

Yes ___ No ✓ (If No, go to 5.)

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

Waste Code	Receiving Facility
_____	_____
_____	_____
_____	_____

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

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

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

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

Complete the following table:

Waste Code	Receiving Facility
_____	_____
_____	_____
_____	_____

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

Yes ___ No ___

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

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

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

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

_____
_____
_____

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

Yes ___ No ✓

Comments_____

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

_____
_____
_____
_____
_____
_____
_____
_____
_____
_____
_____
_____
_____
_____
_____
_____
_____
_____
_____
_____
_____
_____
_____
_____

Name of Facility: SAFETY-KLEEN CORP. CHICAGO RL.

I.D. Number: ILD005450697 0316000053

Location: 1445 W. 42nd Street
Chicago, IL 60609

Date of Inspection: 7/27/94

Inspector: Anne Van Orden

Telephone Number: 708-338-7900

- [ ] Interim Status
- [x] RCRA Permit
- [x] Treatment
- [x] Storage
- [ ] Disposal
- [ ] Land Disposal Facility

Are there any known releases? Yes ___ No ✓

Does the unit receiving CERCLA waste meet the double liner requirements? Yes ___ No ✓

Any Class I violations? Yes ___ No ✓

Sent 7/29/94

If yes, identify type briefly:

Schedule for next inspection: January 1995

Please complete this form and mail it within 24 hours of the date of inspection.

RECEIVED
WMD RCRA
RECORD CENTER

File

Illinois Environmental Protection Agency
Division of Land Pollution Control

RCRA INSPECTION REPORT

USEPA #: IL D005450697 | IEPA #: 0316000053

Facility Name: SAFETY-KLEEN CORP CHICAGO RC | Phone #: 312/247-2828

Street Address: 1445 WEST 42nd Street | County: Cook

City: Chicago | State: IL | Zip: 60609

Region: Maywood | Inspection Date: 11/26/94 | From: 9:00 Am To: 11:00 Am

Weather:

TYPE OF FACILITY

Notified As: G, Trans, TSD, WAF, OSF | Regulated As: G, S, T, WAF

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

TYPE OF INSPECTION

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

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

NON-REGULATED STATUS N/A

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

PART A

Notification Date: 8/5/80, from (initial) or (subsequent) Notification.

Initial Part A Date: 11/19/80 Amended: 9/24/90

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

PART B PERMIT APPLICATION

Part B Permit Submitted: (Y) or N 11/9/88 Final Permit Issued: 9/30/92

ENFORCEMENT N/A

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

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

ORDERS ISSUED N/A

CACO: ___/___/___ CAFO: ___/___/___ Consent Decree: ___/___/___

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

TSD FACILITY ACTIVITY SUMMARY

Activity by Process Code	On Part A?	Activity Conducted Prior to 1980?	Was Activity Ever Done?	Closed	Being done at Time of Insp.?	Exempt per 35 IAC. Sec.	On Annual Report 1992	1991	1990
S01	YES	YES	YES	NO	YES	N/A	YES	YES	YES
S02	YES	YES	YES	NO	YES	N/A	YES	YES	YES
R03	N/A	YES	YES	N/A	YES	725.101(c)(b)	NO	NO	NO

RECEIVED
FEB 06 1994
IEPA - DLPC

OWNER		OPERATOR	
Name	SAFETY-KLEEN CORP	Name	SAFETY-KLEEN CORP CHICAGO R
Address	1000N Randall Road	Address	1445 W. 42nd St.
City	Elgin	City	Chicago
State	IL Zip 60	State	IL Zip 60609
Phone #	708/468-2579	Phone #	312/247-2828

PERSON(S) INTERVIEWED	TITLE	PHONE #
Alfred Aghapour	Facility Manager	312/247-2828

INSPECTION PARTICIPANT(S)	AGENCY/TITLE	PHONE #
Anna Van Orden	IEPA / EPS	708/531-5900

PREPARED BY	AGENCY/TITLE	PHONE #
SAME		

SUMMARY OF APPARENT VIOLATIONS

Area	Class	Section

Area	Class	Section

RECEIVED
FEB 08 1994
IEPA-DLPC

Area	Class	Section

Safety-Kleen Corp. Chicago RC
0316000053 ILD005450697
January 26, 1994

NARRATIVE

The Safety-Kleen Chicago RC(SKCRC) is an organic chemicals reclamation and recycling facility permitted to treat and store hazardous waste under a Part B Permit.

The SKCRC accepts organic chemicals and solvent wastes from industrial and commercial facilities. Reclamation and recycling operations involve either regeneration of the spent solvent or blending and processing of the material for use as a hazardous waste fuel.

Processes utilized in the reclamation of used solvents , solvent mixtures and other solvent containing wastes include neutralization, distillation, fractionation, liquid-liquid extraction and drying.

SKCRC handles primarily two accounts:

1) The Toll Business - The toll customer (generally industrial accounts) ships waste or off-specification material to the SKCRC for treatment. The facility reclaims the material to the customer's specifications and returns the material to the generator.

2) The Recycling Business - The recycling business consists of industrial solvents which come to the SKCRC from Safety-Kleen sales network. These waste materials are recycled at the facility to Safety-Kleen corporate specifications and the processed material is sold as product on the market.

HAZARDOUS WASTE UNITS

TYPE	ACTIVE	CLOSED	WASTES	SIZE/ CAPACITY	(D)IKED;(C)ONCRETE/DIR(T)/ (G)RAVEL FLOOR;TYPE OF SECONDARY CONTAINMENT
SO1	Y	N	Numerous, See Part B	108,900 Gallons	D; C; Catch Basin
SO2	Y	N	Numerous, See Part B	1,119,865 Gallons	D; C; Vault w/coating on concrete

RECEIVED
FEB 08 1994
IEPA-DLPC

HAZARDOUS WASTES

Still Bottoms - F001, F002, F003, F005

- Residual material from the distillation process
- Rate of generation: 25,000 - 50,000 gal/month
- Shipped to Safety-Kleen in Clarksville, MO for fuel blending or reclamation.
- Amount on site: 12,581 gallons

Misc. Drummed Waste & Waste Filters - F001, F002, F003, F005

- Waste generated by various methods:
  - Cleaning out tanks
  - Used oil dry
  - Hose drippings
  - Cut drums in order to remove solid material
  - Used filters from filtering material from waste and product tanks
- Rate of generation: 30 - 45 drums/month
- Shipped to Safety-Kleen in Hebron, OH for fuel blending/ reclamation or further treatment.
- Amount on site: 123 drums

Remanifasted Waste - F001, F002, D001

- Waste generated not intended for reclamation on site but is stored temporarily until it is sent off-site for reclamation. Also, waste shipped to facility in error.
- Rate of generation: <5,000 gal/month
- Shipped to Safety-Kleen in Dolton, IL for fuel blending or further reclamation.
- Amount on site: 0

Spent Solvent - F005, D001

- Waste generated from two parts washers and one immersion cleaner unit.
- Rate of generation: 30 gal/month
- Shipped to Safety-Kleen in Franklin Park, IL for storage prior to off-site reclamation.
- Amount on site: 0

RQ Haz Liquid - D008

- Waste generated from bulking Glycol process
- Rate of generation: 0
- Shipped to Safety-Kleen Dolton, IL for reclamation.
- Amount on site: 0
- Facility has discontinued this process.

RCRA Part B Inspection Site # 0316000053

Section I: Containers

	Compliance	
A. Hazardous Waste Management Units	(YES)	NO
B. Waste Identification	(YES)	NO
C. Condition of Containers	(YES)	NO
D. Compatibility of Containers	(YES)	NO
E. Management of Containers	(YES)	NO
F. Inspections	(YES)	NO
G. Containment	(YES)	NO
H. Ignitable or Reactive Wastes	(YES)	NO
I. Special Requirements for Incompatible Wastes	(YES)	NO
J. General Operating Requirements	(YES)	NO
K. Closure Requirements	(YES)	NO

Description of violation: _____

Section II: Tank Systems

	Compliance	
B. Waste Identification	(YES)	NO
C. Containment and Detection of Releases	(YES)	NO
D. General Construction Requirements	(YES)	NO
E. General Operating Requirements	(YES)	NO
F. Tank System Certification	(YES)	NO
G. Response to Leaks or Spills	(YES)	NO

Section II: Tank Systems (continued)

	Compliance	
H. Inspections	(YES)	NO
I. Reporting and Recordkeeping	(YES)	NO
J. Ignitable and Reactive Wastes	(YES)	NO
K. Special Requirements for Incompatible Wastes	(YES)	NO
L. Closure	(YES)	NO

Description of violations: _____

Section III: Reporting and Notification Requirements

	Compliance	
Containers	(YES)	NO
Tank Systems	(YES)	NO
Corrective Action	(YES)	NO
Standard Conditions	(YES)	NO
Additional Special Conditions	(YES)	NO

Description of violations: _____

Section IV: Corrective Action

	Compliance	
E. Financial Assurance for Corrective Action	(YES)	NO
F. Notification Requirements for and Assessment of Newly-Identified Solid Waste Management Unit(s)	(YES)	NO
G. Future Releases from SWMUs	(YES)	NO
H. Completion of Corrective Action	(YES)	NO

Description of violations: _____

Section V: Standard Conditions

	Compliance	
A. General Requirements	(YES)	NO
B. General Facility Standards	(YES)	NO
C. Preparedness and Prevention	(YES)	NO
D. Contingency Plan	(YES)	NO
E. Manifest System, Recordkeeping and Reporting	(YES)	NO
F. Closure	(YES)	NO
G. Land Disposal Restrictions	(YES)	NO

Description of violations: _____

OBSERVATIONS

Tank Farm #5 (Flammable & Combustible Liquids) has finished with the installation of Foam/Water system. The construction of the fire suppression and alarm system is completed and operational.

The new Lab building is completed and in operation.

Thickness inspections on all tanks were completed in 1993.

Facility has discontinued their glycol processing operation at the facility.

At the time of the inspection, this facility was regulated as a generator, treatment, storage facility and marketer of hazardous waste fuel. The facility appeared to be in compliance with all applicable RCRA regulations and their Part B Permit requirements.

Facility Name: SAFETY-KLEEN CHICAGO EC

USEPA #: D 0 0 5 4 5 0 6 9 7

IEPA #: 0 3 1 6 0 0 0 0 5 3

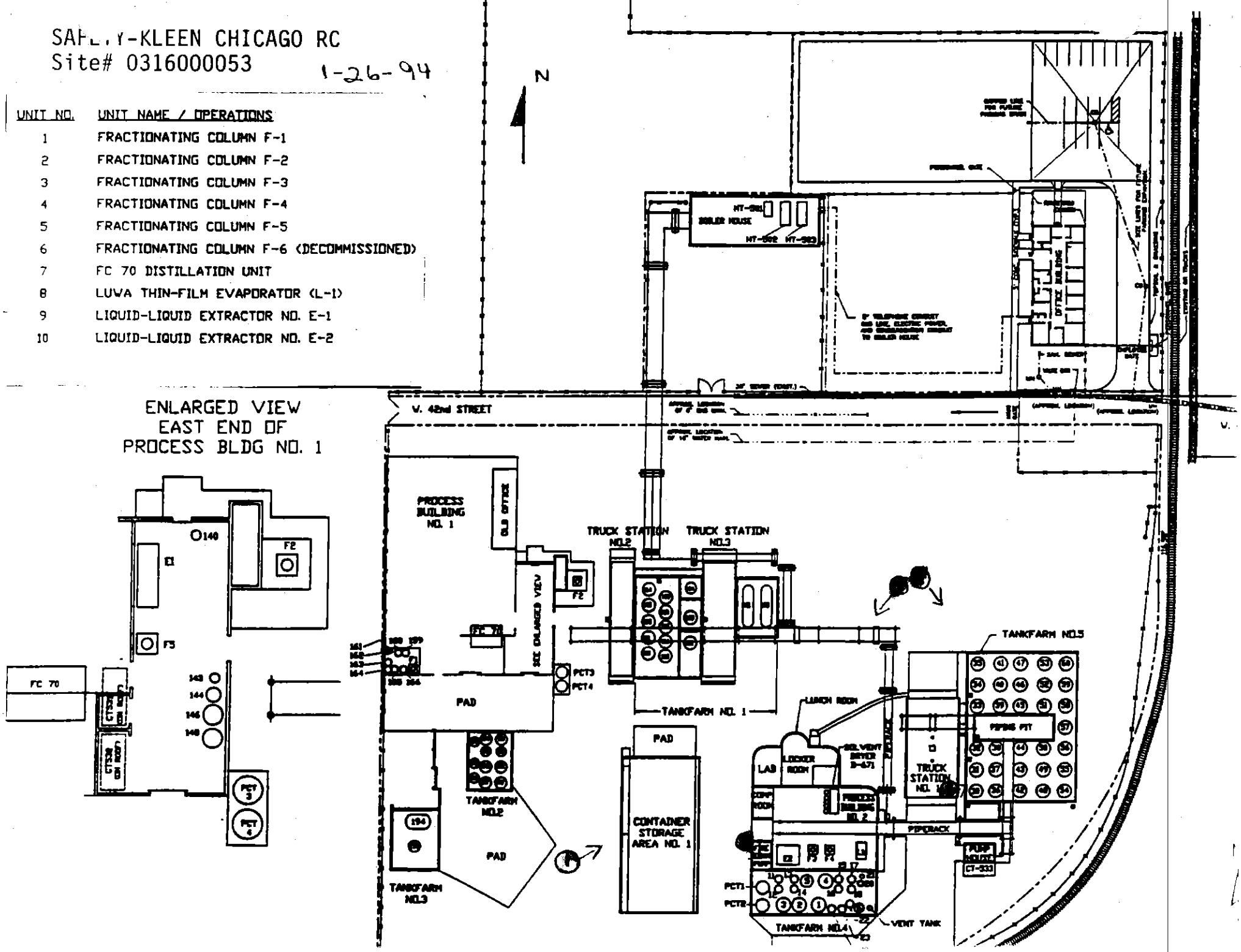
WASTE DISPOSITION FORM

Waste Name (include haz & waste for which no determination has been made)	Generating Process (For waste gen. on site. N/A for TSD)	Date of Last Analysis	USEPA Haz Waste #	• On 8700-12	• On 3510-3	On Annual Report for: (Circle if present; cross out if not present) • 19 92	• 19 91	• 19 90	Amount on Site	Rate of Generation	Last Manifested Shipment	Disposition
STILL BOTTOMS	Residual material from Distillation Process	EVERY SHIPMENT	F001 F002 F003 F005	YES	YES	G ~~F~~	G ~~F~~	G ~~F~~	12,581 gallons	25-50,000 gal/mo	1/21/94	S-K Clarksville, MO For Blending + Reclamation
MISC. DRUMMED WASTE	- Cleaning out tanks - Used oil, Dry - Hose Drippings		F001 F002	YES	YES	G ~~F~~	G ~~F~~	G ~~F~~	43 DMS	30-45 DMS	12/16/93	S-K Heboron, OH for blending/reclamation, treatment or Incineration
WASTE FILTERS	used to filter waste + product as material		F001 F002 F003 F005	YES	YES	G ~~F~~	G ~~F~~	G ~~F~~	80 DMS	A month		
Remanufactured waste	enters tanks - Barrels - Temp. storage		F001 F002 D001	YES	YES	G ~~F~~	G ~~F~~	G ~~F~~	Ø	< 5000 gal/month	7/7/93	S-K. Clarksville, MO.
Spent Solvent	2 parts washers 1 immersion cleaner		F005 D001	YES	YES	G ~~F~~	G ~~F~~	G ~~F~~		30 gal month.	12/28/93	S.K. Franklin Park blending/reclam.
Glycol Processing	Bulking		D002	YES	YES	G ~~F~~	G ~~F~~	G ~~F~~	Ø	No longer processed	12/7/93	S-K. Dolton Reclamation
						G F	G F	G F				
						G F	G F	G F				
Process no longer done at this Facility						G F	G F	G F				
						G F	G F	G F				

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

SAFETY-KLEEN CHICAGO RC
Site# 0316000053 1-26-94

UNIT NO.	UNIT NAME / OPERATIONS
1	FRACTIONATING COLUMN F-1
2	FRACTIONATING COLUMN F-2
3	FRACTIONATING COLUMN F-3
4	FRACTIONATING COLUMN F-4
5	FRACTIONATING COLUMN F-5
6	FRACTIONATING COLUMN F-6 (DECOMMISSIONED)
7	FC 70 DISTILLATION UNIT
8	LUWA THIN-FILM EVAPORATOR (L-1)
9	LIQUID-LIQUID EXTRACTOR NO. E-1
10	LIQUID-LIQUID EXTRACTOR NO. E-2



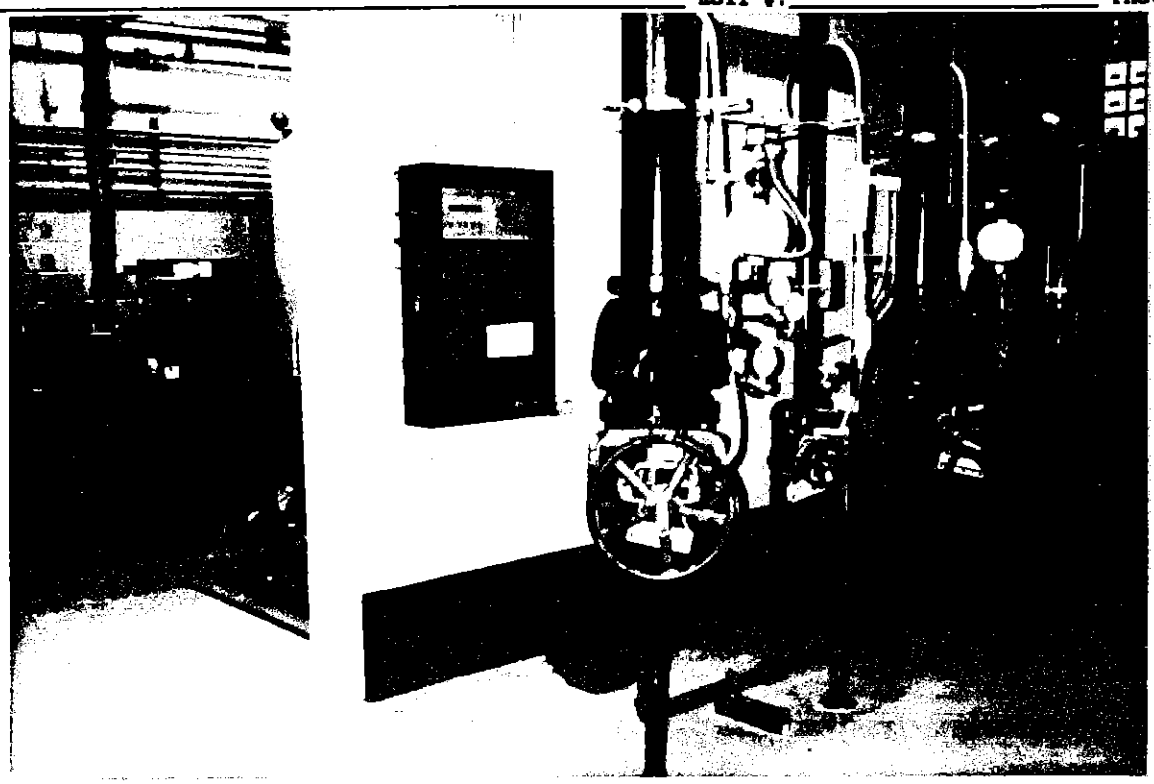
Illinois Environmental Protection Agency Photographs

Name: Safety-Kleen Corp. Chicago RC IEPA #: 0316000053

Date: January 26, 1994 Time: 9:00AM - 11:00AM Photograph By: Anna VanOrden (AVO)

Comments: FACING NORTHEAST - CONTAINER STORAGE AREA

Roll #: 94-227 Photo #: 1



Comments: INSIDE NEW FIRE SUPPRESION AND ALARM

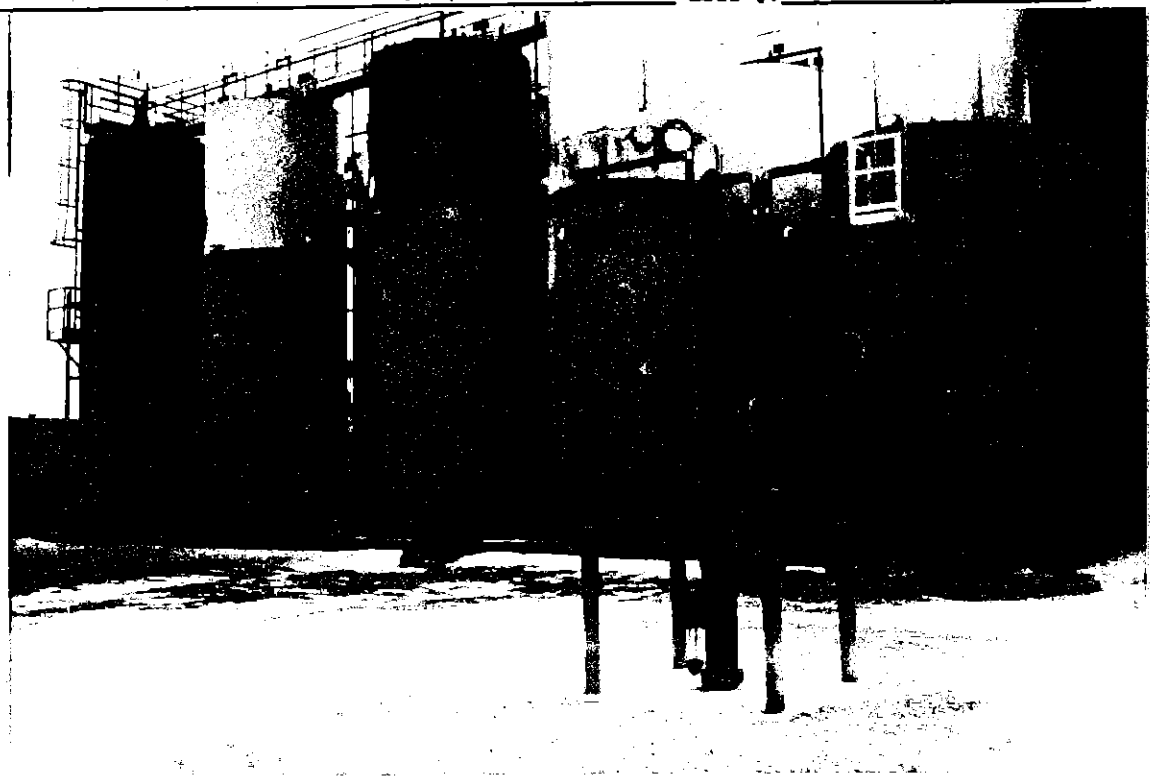
Roll #: 94-227 Photo #: 2

Illinois Environmental Protection Agency Photographs

Name: Safety-Kleen Corp. Chicago RC IEPA #: 0316000053

Date: January 26, 1994 Time: 9:00AM - 11:00AM Photograph By: Anna VanOrden (AVO)

Comments: FACING EAST. TRUCK STATION #1 - SATELLITE ACCUMULATION AREA Roll #: 94-227 Photo #: 3



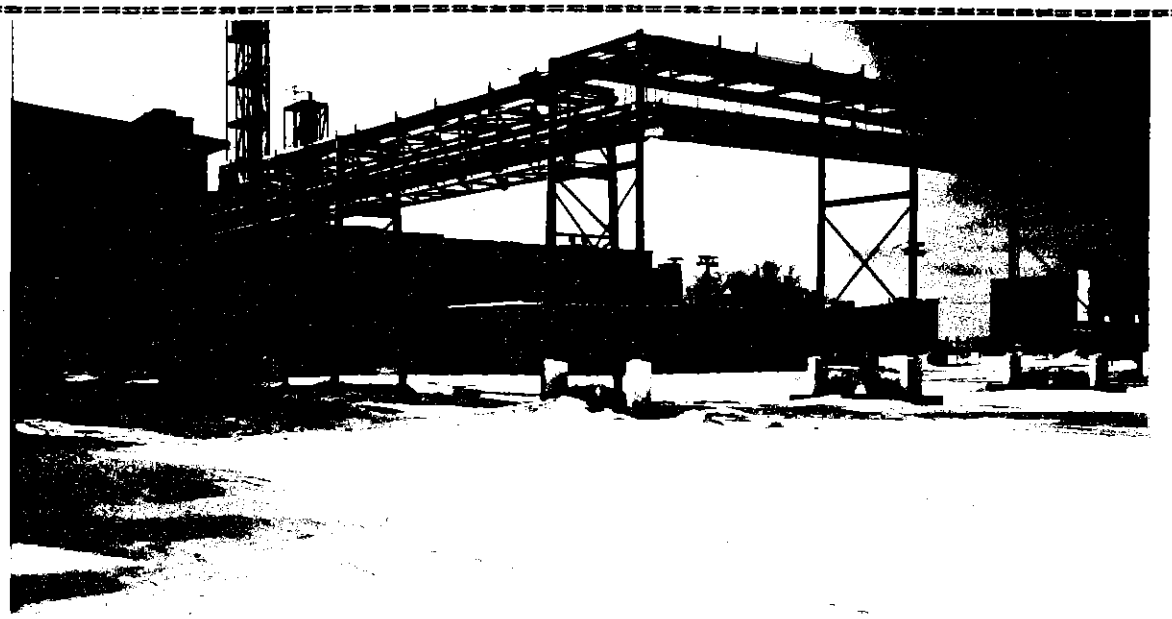
Comments: FACING SOUTHEAST - TANK FARM #5 - FIRE SYSTEM

94-227 Photo #: 4

Illinois Environmental Protection Agency Photographs

Name: Safety-Kleen Corp. Chicago RC IEPA #: 0316000053

Date: January 26, 1994 Time: 9:00AM - 11:00AM Photograph By: Anna VanOrden (OVO)



Comments: FACING SOUTHWEST - LOOKING TOWARDS THE NEW LAB BUILDING COMPLETED. Roll #: 94-227 Photo #: 5

Comments:

Roll #: 94-227 Photo #:

Area	Class	90 Day F U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No
				PART 722 **GENERATOR STANDARDS** **Subpart A: General**				
OTH	1			**Section 722.111: Hazardous Waste Determination**	✓			
				Has the generator determined if the solid waste it generates is a hazardous waste? Yes ✓ No ___				
				Did the generator follow the procedures specified in this section in making its determination? Yes ✓ No ___				
OTH	1			**Section 722.112: USEPA Identification Number**	✓			
			a	Has the generator obtained a USEPA identification number? Yes ✓ No ___				
			c	Has the generator offered his hazardous waste only to transporters or to treatment, storage or disposal facilities that have received a USEPA identification number? Yes ✓ No ___				

Area	Class	90 Day F U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No
				PART 722 **GENERATOR STANDARDS** **Subpart B: The Manifest**				
MAN	2			**Section 722.120: General Requirements**	✓			
			a	Has the generator who transports, or who offers its hazardous waste for transportation off-site for treatment, storage or disposal prepared a uniform hazardous waste manifest? Yes ✓ No ____ **Note: If the generator has not used a manifest, check "No" in the Apparent Compliance Column and skip to 722.130.**				
			b	Did the generator designate on the manifest one facility which is permitted to handle the hazardous waste therein described? Yes ✓ No ____ **Note: The generator may also designate an alternate facility permitted to handle the hazardous waste in the event an emergency prevents delivery of the hazardous waste to the primary designated facility.**				
			d	In any instances where the transporter was unable to deliver the hazardous waste to the designated or alternate permitted facility, has the generator designated another permitted facility or instructed the transporter to return the waste? Yes ✓ No ____				

Area	Class	90 Day F U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Continued No
MAN	2			**Section 722.121: Acquisition of Manifests**	✔			
			a	Did the generator use the manifest supplied by the Agency for hazardous waste going for treatment, storage or disposal in Illinois? Yes ✔ No ____ N/A ____				
			b	For hazardous waste going outside Illinois for treatment, storage or disposal, has the generator used the manifest supplied by the Agency if the State to which the hazardous waste is being shipped does not supply and require the completion of its own State manifest? **or** For hazardous waste going outside Illinois for treatment, storage or disposal, has the generator used the manifest required by the State to which the hazardous waste is being shipped? Yes ✔ No ____ N/A ____				
MAN	2			**Section 722.122: Number of Copies** Does the manifest the generator is using consist of at least six copies (plus one copy for each additional transporter)?	✔			
MAN	2			**Section 722.123: Use of the Manifest** For each manifest received, has the generator: 1) Signed the certificate by hand? Yes ✔ No ____ 2) Obtained the handwritten signature and the date of acceptance by the initial transporter? Yes ✔ No ____	✔			

IL 532-1502
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
				3) Retained one copy as required by Section 722.140(a), Recordkeeping? Yes ✓ No ___				
				4) Apparently sent a copy (Part 5 for Illinois manifests) to the Agency within two working days? Yes ✓ No ___				
				NOTE: Obtain a copy of any manifest which is not in compliance with the requirements of this subsection. If copies are unobtainable, log manifest #s.				
			b	Has the generator apparently given the remaining copies of the manifest to the transporter? Yes ✓ No ___				
			c	Has the generator followed the procedures prescribed in Section 722.123(c) for manifesting bulk shipments of hazardous waste by water? Yes ___ No ___ N/A ✓				No shipments by water or rail.
			d	Has the generator followed the procedures prescribed in Section 722.123(d) for manifesting bulk shipments of hazardous waste by rail? Yes ___ No ___ N/A ✓				

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No
				PART 722 **GENERATOR STANDARDS** **Subpart C: Pre-Transport Requirements**				No waste ready for transportation off-site.
OTH	1	X		**Section 722.130: Packaging** Is waste which is ready for transportation off-site packaged in accordance with 49 CFR, Parts 173, 178 and 179?			✓	
OTH	1	X		**Section 722.131: Labeling** Is each package of hazardous waste which is ready for transportation off-site labeled in accordance with 49 CFR Part 172?			✓	
OTH	1	X		**Section 722.132: Marking**			✓	
			a	Is each package of hazardous waste which is ready for transportation off-site marked in accordance with 49 CFR Part 172? Yes ___ No ___				
			b	Is each package of hazardous waste which is ready for transportation off-site marked with: - The generator's name and address? Yes ___ No ___ - The manifest document number associated with the container? Yes ___ No ___ - The words "Hazardous Waste - Federal Law Prohibits Improper Disposal. If found contact the nearest police, or public safety authority or the U.S. Environmental Protection Agency"? Yes ___ No ___				

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No
OTH	1			**Section 722.133: Placarding** Does the generator have, for the waste it generates, the proper placards to: - Placard the transport vehicle, or - Offer to the first transporter, according to 49 CFR, Part 172, Subpart F? **NOTE: If the placards are provided by the transporter, then mark the N/A Column and use Comment field to explain.**			✓	Transporter supplies placards.
OTH	1	X		**Section 722.134: Accumulation Time** **NOTE: If the TSD checklist will be completed and the facility only accumulates wastes for 90 days or less for Section 722.134 complete page GEN-C-2(a) then skip to TSD checklist.** **NOTE: A generator who is also a TSD would be subject to this section for any waste which is not identified for storage on the facility's Part A, or which is being accumulated outside a "permitted" storage area.**			✓	FACILITY HAS PART B PERMIT FOR STORAGE OF HAZARDOUS WASTE.
			a	For waste in containers, has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subpart I: Use and Management of Containers listed below: **NOTE: If no wastes in containers, mark "N/A" and skip to Section 725.291 of the Generator checklist.**				

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No
OTH	1	X		**Section 722.134: Accumulation Time**			✓	
				NOTE: A generator who is also a TSD would be subject to this section for any waste which is not identified for storage on the facility's Part A, or which is being accumulated outside a "permitted" storage area.				
			a1	For waste in containers, has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subpart I? **and/or** For waste in tanks, has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subpart J except Section 725.297(c) and 725.300? Yes ____ No ____				
			a2	For waste in containers, has the generator marked and made visible for inspection on each container, the date upon which accumulation began? Yes ____ No ____ N/A ____				
			a3	For waste in containers and tanks, has the generator marked or labeled each with the words "Hazardous Waste"? Yes ____ No ____				
			a4	Has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subparts C and D, and Section 725.116? Yes ____ No ____				

IL 532-1892
IEPA 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
				SATELLITE ACCUMULATION				
			c1	Is the generator who accumulates hazardous waste in containers at or near any point of generation where wastes initially accumulate and which is under the control of the operator of the process generating the waste: - Limiting such accumulation to 55 gallons (one quart of acutely hazardous waste listed in 35 Ill. Adm. Code 721.133)? Yes ✓ No ___ N/A ___ - Complying with the requirements of: 1) 35 Ill. Adm. Code 725.271, Condition of Containers? Yes ✓ No ___ 2) 35 Ill. Adm. Code 725.272, Compatibility of Waste with Containers? Yes ✓ No ___ 3) 35 Ill. Adm. Code 725.273(a), Management of Containers - requiring that the containers be stored closed except when waste is being added or removed? Yes ✓ No ___ - Marking the containers with the words "Hazardous Waste" or with words that identify the contents of the containers? Yes ✓ No ___				

IL 532-1592
LPC 266 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
			c2	Has the generator who accumulates more than 55 gallons (one quart of acutely hazardous waste listed in 35 Ill. Adm. Code 721.133(e)) with respect to the amount of excess waste, complied with the requirements in Section 722.134(a) within three days? Yes ____ No ____ Are the containers with the excess amounts marked with the date accumulation began? Yes ____ No ____ During the three day period, is the generator continuing to comply with the requirements of Section 722.134(c)(1)? Yes ____ No ____				No excess accumulation

IL 532-1892
LPC 286 8787

Area	Class	90 Day F U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No
				PART 722 **GENERATOR STANDARDS** **Subpart D: Recordkeeping and Reporting**				
OTH	2			**Section 722.140: Recordkeeping**	✓			
				Has the generator retained for a period of three years:				
			a	- A copy of each signed manifest? Yes ✓ No ___				
			b	- A copy of each annual report? Yes ✓ No ___				
			b	- A copy of each exception report? Yes ___ No ___ N/A ✓				
			c	- Copies of test results, waste analyses or other determinations made in accordance with Section 722.111? Yes ✓ No ___ N/A ___				
			d	Does a generator who is involved in any unresolved enforcement action continue to maintain the records required in 722.140(a) thru (c)? Yes ___ No ___ N/A ✓				
			d	If the Director has requested that the records required in 722.140(a) thru (c) be maintained for a period longer than three years, has the generator continued to maintain them? Yes ___ No ___ N/A ✓				

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 722.141: Annual Reporting**	✓			
				Has the generator who ships waste off-site to a treatment, storage or disposal facility within the United States prepared and submittted a copy of an annual report, as supplied by the Agency, to the Agency by March 1 for the preceeding calendar year?				
				NOTE: A generator who treats, stores or disposes of hazardous waste on-site must also submit an annual report as a TSD in accordance with the requirements of 35 Ill. Adm. Code 702, 703, 724, 725 and 40 CFR 266.				
MAN	1			**Section 722.142: Exception Reporting**			✓	No exception reports
			a	Has the generator who has not received a signed copy of the manifest from the designated TSD within 35 days of the date the waste was accepted by the initial transporter determined the status of its hazardous waste? Yes ____ No ____				
			b	Has the generator who has not received a signed copy of the manifest from the designated TSD within 45 days of the date the waste was accepted by the original transporter submitted an exception report to the Director? Yes ____ No ____				
			b	Does any exception report submitted to the Director contain the following:				
				- A legible copy of the manifest for which the generator does not have confirmation of delivery; and				

IL 537-1b
LPC 206 8/87

Area	Class	90 Day F U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No
				- A cover letter signed by the generator or his authorized representative explaining the efforts taken to locate the hazardous waste and the results of those efforts? Yes ____ No ____ N/A ____				
OTH	1			**Section 722.143: Additional Reporting** Has the generator submitted all additional reports concerning quantities and disposition of wastes as required by the Director?			✓	None required

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
OTH	1/2			**PART 722** **GENERATOR STANDARDS** **Subpart E: Exports of Hazardous Waste** **Section 722.152: General Requirements** Has the facility made any shipments of hazardous waste outside the United States? Yes ____ No ✓ **NOTE: If "No", skip Subpart E. If "Yes", answer the next question.** Has the generator complied with the requirements in Sections 722.152 through 722.157? Yes ____ No ____ **NOTE: If the answer is "No", explain in detail why the firm did not meet the requirements. Review the requirements prior to answering this question. When citing a violation of this Subpart, identify the specific section violated in the Narrative as well as in the Comments.**			✓	No exports of H.W.

IL 532-1592
LPC 286 6/87

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No
				PART 722 **GENERATOR STANDARDS** **Subpart F: Imports of Hazardous Waste**				
MAN	1			**Section 722.160: Imports of Hazardous Waste**			✓	No Imports of H.W.
			b1	Has the person importing hazardous waste met the manifest requirements of Section 722.120 except that: In place of the generator's name, address and USEPA identification number, the name and address of the foreign generator and the importer's name, address and USEPA identification number are used; **and**				
			b2	Has the importer or his agent signed the manifest in place of the generator; **and**				
			b2	Has the importer or his agent obtained the signature of the initial transporter? Yes ____ No ____ N/A ____				
			c	Is the person importing hazardous waste using manifests obtained from the Agency? Yes ____ No ____				

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	X		**PART 722** **GENERATOR STANDARDS** **Subpart G: Farmers** **Section 722.170: Farmers** Is a farmer who is disposing of waste pesticides from his own use which are hazardous wastes: - Triple rinsing each emptied pesticide container in accordance with 35 Ill. Adm. Code 727.107(b)(3), Residues of Hazardous Waste in Empty Containers? Yes ___ No ___ N/A ___ - Disposing of pesticide residue on his own farm in a manner consistent with the disposal instructions on the pesticide label? Yes ___ No ___ N/A ___ **NOTE: If the answer to either of the preceeding questions is "No", the farmer is subject to the requirements of this Part (722) and to the applicable portions of 35 Ill. Adm. Code 702, 703 and 725 (724). Complete the applicable inspection form(s).**			✓	No farming activity

IL 532-1592
LPC 264 8/87

Area	Class	90 Day FO Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No
				PART 726 **STANDARDS FOR THE MANAGEMENT OF SPECIFIC HAZARDOUS WASTE AND SPECIAL TYPES OF HAZARDOUS WASTE MANAGEMENT FACILITIES** **Subpart D: Hazardous Waste Burned for Energy Recovery** **<u>NOTE</u>: Facilities that burn hazardous waste for energy recovery (excluding Subpart O incinerators) are subject to this subpart. However, used oil which has a hazardous characteristic is not regulated under Subpart D, but rather Subpart E. Materials identified in 721.104 and 721.106(a)(3)(E) through (I), and hazardous waste subject to 721.105 (SQG) are exempt from this subpart.**				
OTH		X		**Section 726.132: Standards Applicable to Generators of Hazardous Waste Fuel**	✓			
	I		a	Is the generator in compliance with 722 requirements (complete and attach the GEN or RR GEN checklist)? Yes ✓ No ___ N/A ___				
OTH				**Section 726.133: Standards Applicable to Transporters of Hazardous Waste Fuel**			✓	NOT A TRANSPORTER
	I			Is the transporter in compliance with 723 requirements (complete and attach the TR checklist)? Yes ___ No ___ N/A ✓				
OTH		X		**Section 726.134: Standards Applicable to Marketers of Hazardous Waste Fuel**	✓			
OTH	II		a	Is the marketer marketing hazardous waste fuel only to persons who have notified USEPA of their hazardous waste fuel activities and have obtained a USEPA identification number? Yes ✓ No ___ N/A ___				
				and				

IL 532-1582

Area	Class	90 Day FO Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No
				If the fuel is burned, only to persons who burn the fuel in boilers or industrial furnaces identified in 726.131(b)? Yes ✓ No ___ N/A ___				Cement Kilns
	II		b	Has the marketer notified USEPA of its hazardous waste fuel activities (even if the marketer has previously notified USEPA of its other hazardous waste activities and has obtained a USEPA identification number)? Yes ✓ No ___ N/A ___				
	I		c	Is the marketer in compliance with 702, 703, 722.134, 724 Subparts A through L, and 725 Subparts A through L (complete and attach the necessary checklist(s) PER, TSD, etc.)? Yes ✓ No ___ N/A ___				FACILITY OPERATING UNDER PART B.
	I		d	For off-site shipments, is the marketer in compliance with 722 (complete and attach the GEN checklist)? Yes ✓ No ___ N/A ___				
	II		e	Required Notices. Has the marketer obtained a notice from the receiver of the hazardous waste fuel (a burner or subsequent marketer) that they have: notified USEPA (3010 RCRA), re-notified USEPA of waste-as-fuel activity, and if the waste fuel is to be burned, that it is burned only in an industrial furnace or boiler per 726.131(b). Yes ✓ No ___ N/A ___				
	II		e	Before accepting hazardous waste fuel, has the receiver (buyer) provided notices to the seller as outlined in the previous question? Yes ✓ No ___ N/A ___				
	II		f	Has the marketer kept a copy of each certification, sent or received, for three years? Yes ✓ No ___ N/A ___				

532-1882

Area	Class	90 Day F U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No
OTH				**Section 726.135: Standards Applicable to Burners of Hazardous Waste Fuel**			✓	
	I		a	Is the owner of an industrial furnace or boiler complying with the prohibitions in Section 726.131(b)? Yes ___ No ___ N/A ___				FACILITY DOES NOT BURN H.W. FUEL
	II		b	Has the USEPA been re-notified as to the burner's hazardous waste fuel activities? Yes ___ No ___ N/A ___				
	I		c	Does the burner accumulate/store hazardous waste fuel for a time period exceeding 90 days? Yes ___ No ___				
				NOTE: If "Yes", then the facility is subject to 702, 703, and 725 A through L (or 724 A through L for new facilities) and the appropriate checklist(s) must be completed. If "No", the facility must comply with 722.134 Accumulation Time.				
	I		c	Is the facility in compliance with 722.134? Yes ___ No ___ N/A ___				
	II		d	Prior to receiving the first shipment of hazardous waste fuel from a marketer, has the owner or operator of the industrial furnace or boiler provided the certification required in Sec. 726.135(d)? Yes ___ No ___ N/A ___				
	II		e	Has the burner kept a copy, for three years, of each certification notice that was sent to the marketers? Yes ___ No ___ N/A ___				

Area	Class	90 Day F U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No
				PART 726 **STANDARDS FOR THE MANAGEMENT OF SPECIFIC HAZARDOUS WASTE AND SPECIAL TYPES OF HAZARDOUS WASTE MANAGEMENT FACILITIES** **Subpart F: Recyclable Materials Utilized for Precious Metals Recovery** **NOTE: Generators, transporters or storers of recyclable gold, silver, platinum, paladium, irradium, osmium, rhodium, or ruthenium are subject to regulation under this subpart.**				At this time facility has a permit to store but not treat. Facility is not accepting waste for reclamation of silver until permit approval for treatment.
OTH		X		**Section 726.170: Applicability and Requirements**			✓	
	II		b	Has the USEPA been notified pursuant to 3010 of RCRA? Yes ____ No ____				
	I			If a generator, then are they in compliance with 722 Subpart B (the manifest)? Yes ____ No ____ N/A ____				
	I			If a transporter, then are they in compliance with 722.120 and 722.121 (manifest)? Yes ____ No ____ N/A ____				
	I			If a storer, then are they in compliance with 725.171 and 725.172 (use of the manifest and manifest discrepancies)? Yes ____ No ____ N/A ____				
			c	If a storer, are records that document they are not accumulating the materials speculatively being kept? Yes ____ No ____ N/A ____				
	I		d	If recyclable materials that are accumulated speculatively (as defined in 721.101(c)), then is the facility in compliance with 722 through 725, 702, 703, and 705 (complete the necessary checklist(s))? Yes ____ No ____ N/A ____				

Area	Class	90 Day F U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No
				PART 726 **STANDARDS FOR THE MANAGEMENT OF SPECIFIC HAZARDOUS WASTE AND SPECIAL TYPES OF HAZARDOUS WASTE MANAGEMENT FACILITIES** **Subpart G: Spent Lead-Acid Batteries Being Reclaimed**				
				NOTE: These regulations apply to persons who reclaim spent batteries. Those who collect, but don't reclaim them are not subject to regulation.				
OTH		X		**Section 726.180: Applicability and Requirements**				
	II		b	Has the USEPA been notified pursuant to 3010 of RCRA? Yes ____ No ____				
	I			Is the facility in compliance with 724/725 Subparts A, B (excluding 724.113), C, D, E (excluding 724.171 and 724.172), and F through L (complete and attach the TSD checklist)? Yes ____ No ____				
	I			Is the facility in compliance with 702, 703 and 705 (complete and attach the necessary checklist(s)? Yes ____ No ____				

RCRA LAND DISPOSAL RESTRICTIONS INSPECTION

I. General Information

Facility: SAFETY-KLEEN CORP. CHICAGO RC

U.S. EPA ID No.: ILD005450690 0316000053

Street: 1445 West 42nd street

City: Chicago State: IL Zip: 60609

Telephone: 312/247-2829

Inspection Date: 1/26/94 Time: 9:00-11:00 (am/pm)

Weather Conditions:

	Name	Agency/Title	Telephone
Inspectors:	Anna VanDoden	IEPA/EPS	708/531-5900
Facility Representatives:	Alfred Aghayan	Facility Man	312-247-2828

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

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

* See Appendix A

INSPECTION SUMMARY

Processes That Generate LDR Wastes: See narrative and Waste Disposal Form

LDR Waste Management:

Summary:

Signature:

RCRA LAND DISPOSAL RESTRICTIONS INSPECTION

II. WASTE IDENTIFICATION

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

1. F001 through F005 spent solvents:
   F001 F002 F003 F005

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

3. California List Wastes (See Appendix A):
   Spent Solvents

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

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

6. Third Third Wastes [40 CFR 268.12]**:
   D001

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

B. Waste Code Determination

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

   Yes ✓ No___

   If no, list below:

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

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

Comments: _____

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

Yes ✓ No ___ NA ___

Comments ___

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

Yes ___ No ___ NA ✓

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

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

Yes ___ No ___

Comments ___

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

N/A

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

Yes ___ No ___ List ___

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

Yes ___ No ___ List ___

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

Yes ___ No ___ List ___

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

Yes ___ No ___ List ___

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

Yes ___ No ___ List ___

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

Yes ___ No ___ List _____

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

Yes ___ No ___ List _____

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

Yes ___ No ___ List _____

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

Yes ___ No ___ List _____

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

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

Yes ___ No ___ List _____

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

Yes ___ No___ List _____

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

RCRA LAND DISPOSAL RESTRICTION INSPECTION

III. GENERATOR REQUIREMENTS

A. Treatability Group/Treatment Standard Identification*

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

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

Yes ✓ No ___ NA ___

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

Waste Code	Wastewater*	Nonwastewater
F001	___	✓
F002	___	✓
F003	___	✓
F005	___	✓

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

Comments _____

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

Yes ___ No ___ NA ✓

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

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

Comments _____

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

3. First, Second, and Third Third Wastes:

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

Yes ✓ No ___ NA ___

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

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

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

Comments_____

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

Yes ✓ No ___ NA ___

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

Yes ___ No ___ NA ✓

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

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

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

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

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

Yes ___ No ___ NA ✓

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

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

a. Liquid hazardous wastes containing PCBs ≥50 ppm

Yes ___ No ___ NA ✓

If yes, check the appropriate treatability group:

___ 50 to 500 ppm PCBs
___ ≥500 ppm PCBs

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

Yes ___ No ___ NA ✓

If yes, check the appropriate treatability group:

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

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

Yes ___ No ___ NA ✓

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

Yes ___ No ___ NA ✓

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

Yes ___ No ___ NA ✓

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

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

Comments ___

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

Yes ___ No ✓ NA ___

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

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

Comments ___

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

Yes ___ No ✓

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

Yes ___ No ___

Comments _____

B. **Waste Analysis**

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

Yes ✓ No ___

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

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

Yes ___ No ___

Comments _____

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

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

a. Knowledge of waste:

Yes ✓ No ___

If yes, list the wastes for which applied knowledge was used and describe the basis of determination. Attach documentation. [40 CFR 268.7(a)(5)]
all shipments are analyzed in site.
GC, PCRS, Spec. Grav., PH, Mo H2O, etc.

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

Yes ___ No ___ NA ✓

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

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

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

Yes ___ No ___ NA ✓

*See Appendix C for exceptions.

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

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

Yes ___ No ___ NA ✓

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

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

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

Yes ___ No ✓ (If No, go to 4.)

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

Yes ___ No ___

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

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

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

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

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

Yes ___ No ___

Comments _____

4. Dilution Prohibition [40 CFR 268.3]:

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

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

Yes ___ No ✓ (If No, go to b.)

List the wastes _____

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

Yes ___ No ___

Comments _____

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

Yes ___ No ✓ (If No, go to c.)

Check appropriate category:

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

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

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

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

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

_____

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

Yes ___ No ✓

Comments _____

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

Yes ___ No ___ NA ✓

C. **Management**

1. On-Site Management

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

Yes ✓ No ___

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

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

Comments _____

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

Yes ___ No ___ NA ✓

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

Yes ___ No ___ NA ✓

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

2. Off-Site Management: Waste Exceeds Treatment Standards

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

Yes ✓ No ___ (If No, go to 3.)

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

Waste Code	Receiving Facility
D001	S-K Dolton, IL
F001	S-K Franklin Park, IL
F002	SK Clarksville, MO
F003	Hebron, OH
F006	

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

Yes ✓ No ___ (If No, go to 3.)

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

Yes ___ No ___ NA ___

b. Is a notification sent with each waste shipment?

Yes ✓ No ___

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

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

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

Waste Code	Subsequent Handler
___	___
___	___
___	___

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

Yes ___ No ___

3. Off-Site Management: Waste Meets Treatment Standards

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

Yes ___ No ✓ (If No, go to 4.)

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

Waste Code	Receiving Facility
___	___
___	___
___	___

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

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

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

Yes ___ No ___

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

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

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

Waste Code	Subsequent Handler
___	___
___	___
___	___

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

Yes ___ No ___

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

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

Complete the following table:

Waste Code	Receiving Facility
___	___
___	___
___	___

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

Yes ___ No ___

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

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

Yes ___ No ✓ (If No, go to 5.)

Complete the following table:

Waste Code	Receiving Facility
___	___
___	___
___	___

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

Yes ___ No ___

b. Is a notification sent with each waste shipment?

Yes ___ No ___

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

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

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

Waste Code	Subsequent Handler
___	_____
___	_____
___	_____

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

Yes ___ No ___

5. Records Retention

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

Yes ✓ No ___

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

Yes ___ No ___ NA ✓

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

Yes ___ No ___ NA ✓

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

Comments _____

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

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

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

   List types of waste treatment units and processes:

Waste Code	Type of Treatment	Treatment Units and Processes
F001 F002 F003, F005	Reclamation	Distillation unit Wastewater treatment unit

2. Are treatment residuals generated from these units?

   Yes ✓ No ___

   Comments ___

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

   Yes ✓ No ___ NA ___

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

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

RCRA LAND DISPOSAL RESTRICTION INSPECTION

IV. TSD REQUIREMENTS

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

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

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

Comments ___

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

Yes ___ No ___ NA ✓

3. What date was the waste analysis plan last revised? 9/25/95

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

Yes ✓ No ___

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

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

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

Yes ✓ No ___ NA ___

If analyses are conducted off site, identify lab: ___

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

Yes ___ No ___ NA ✓

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

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

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

Yes ___ No ___ NA ✓

*See Appendix C for exceptions.

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

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

Yes ___ No ___ NA ✓

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

B. Operating Record [40 CFR 264.73 and 265.73]

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

Yes ✓ No ___

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

Yes ✓ No ___

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

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

Yes ✓ No ___ NA ___

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

Yes ___ No ___ NA ✓

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

C. Storage [40 CFR 268.50]

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

Yes ✓ No ___ (If No, go to 2.)

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

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

Yes ✓ No ___

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

Yes ___ No ✓ (If No, go to 2.)

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

Yes ___ No ___

If yes, state how: _____

2. Are prohibited wastes stored on site in tanks?

Yes ✓ No ___ (If No, go to 3.)

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

Yes ✓ No ___

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

Yes ✓ No ___ (If Yes, go to 3.)

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

Yes ___ No ___

If yes, state how:_____

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

Yes ___ No ✓ (If No, go to D.)

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

Yes ___ No ___

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

Yes ___ No ___

D. Treatment

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

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

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

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

Was an alternative method approved?

Yes___ No___

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

Waste Code	Required Technology	Alternative Method	Approval

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

Yes___ No___ NA ✓

4. Describe all other waste codes and treatment processes:

Waste Code	Treatment Processes
F001 F002	Distillation
F004 F005	Fractionation
D001	liquid-liquid extraction

5. Characteristic wastes:

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

Yes ✓ No ___

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

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

Yes ✓ No ___

Comments ___

6. Dilution Prohibition [40 CFR 268.3]:

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

Yes ___ No ✓ (If No, go to c.)

List the wastes ___

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

Yes ___ No ___

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

Yes ___ No ___

Comments ___

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

Yes ___ No ✓

Comments ___

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

Yes ✓ No ___

Comments _____

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

Yes ___ No ✓ (If No, go to 9.)

Complete the following table:

Waste Code	Receiving Facility
___	_____
___	_____
___	_____

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

Yes ___ No ___

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

Yes ___ No ✓ (If No, go to 10.)

Complete the following table:

Waste Code	Receiving Facility
___	_____
___	_____
___	_____

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

Yes ___ No ___

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

Yes ✓ No ___ (If No, go to E.)

Complete the following table:

Waste Code	Receiving Facility
F001,2,3,5	S-K Clarksville Mo + Hebron, OH
D001	SK Dolton - SK - Franklin Park, IL

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

Yes ✓ No ___

E. **Surface Impoundments [40 CFR 268.4]**

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

   Yes ___ No ✓ (If No, go to F.)

   List _____

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

   Yes ___ No ___

   Comments _____

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

   Yes ___ No ___

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

   Yes ___ No ___ NA ___

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

   Yes ___ No ___

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

   Yes ___ No ___

   Comments _____

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

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

Provide the frequency of analyses conducted on treatment residues:
_____

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

Yes ___ No ___ NA___

Comments _____

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

Yes ___ No ___

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

Yes ___ No ___ NA___

Comments_____

F. **Land Disposal**

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

Yes ___ No ✓ (If No, go to G.)

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

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

Unit	Waste
_____	_____
_____	_____
_____	_____

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

Yes ___ No ___

Comments_____

Name of Facility: SAFETY-KLEEN CORP. CHICAGO R.C.

I.D. Number: ILD005450697 0316000053

Location: 1445 W. 42nd Street
Chicago, IL 60609

Date of Inspection: 1-26-94

Inspector: Anne Van Orden

Telephone Number: 708/531-5900

- [ ] Interim Status
- [x] RCRA Permit
- [x] Treatment
- [x] Storage
- [ ] Disposal
- [ ] Land Disposal Facility

Are there any known releases? Yes ___ No ✓

Does the unit receiving CERCLA waste meet the double liner requirements? Yes ___ No ✓

Any Class I violations? Yes ___ No ✓

Sent 1/31/94

If yes, identify type briefly:

Schedule for next inspection: July 1994

Please complete this form and mail it within 24 hours of the date of inspection.

G. Other Wastestreams

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

Yes ✓ No ___ (If No, go to H.)

2. On-Site Management

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

Yes ___ No ___ NA ✓

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

Yes ___ No ___ NA ✓

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

3. Off-Site Management: Waste Exceeds Treatment Standards

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

Yes ✓ No ___ (If No, go to 4.)

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

Waste Code	Receiving Facility
F001 2	S-K Akron OH
F003,5	S-K Dallas TX
D001	S-K Franklin Park, IL

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

Yes ✓ No ___ (If No, go to 4.)

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

Yes ___ No ___ NA___

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

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

Yes ___ No ___

If yes, at what frequency are analyses performed? _____

_____

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

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

List waste codes in appropriate category below:

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

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

Yes ___ No ___ NA ___

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

Yes ___ No ___ NA ___

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

Yes ___ No ___ NA ___

6. Are restricted wastes placed in underground injection wells?

Yes ___ No ___ List _____

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

Yes ___ No ___ NA ✓

4. Off-Site Management: Wastes Meets Treatment Standards

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

Yes ___ No ✓ (If No, go to 5.)

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

Waste Code	Receiving Facility
___	___
___	___
___	___

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

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

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

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

Complete the following table:

Waste Code	Receiving Facility
___	___
___	___
___	___

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

Yes ___ No ___

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

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

Yes ___ No ✓ (If No, go to 6.)

Complete the following table:

Waste Code	Receiving Facility

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

Yes ___ No ___

6. Dilution Prohibition [40 CFR 268.3]:

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

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

Yes ___ No ✓ (If No, go to b.)

List the wastes _____

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

Yes ___ No ___

Comments _____

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

Yes ___ No ✓ (If No, go to c.)

Check appropriate category:

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

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

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

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

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

_____
_____
_____

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

Yes ___ No ✓

Comments_____

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

_____
_____
_____
_____
_____
_____
_____
_____
_____
_____
_____
_____
_____
_____
_____
_____
_____
_____
_____
_____
_____
_____
_____
_____
_____

RECEIVED

SEP 8 1993

OFFICE OF RCRA
WASTE MANAGEMENT DIV
EPA, REGION 5

Illinois Environmental Protection Agency
Division of Land Pollution Control

RCRA INSPECTION REPORT

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

Facility Name: SAFETY-KLEEN CORP. CHICAGO RC | Phone #: 312) 247-2828

Street Address: 1445 WEST 42nd Street | County: Cook

City: Chicago | State: IL | Zip: 60609

Region: Maywood | Inspection Date: 7 / 29 / 93 | From: 9:00 AM To: 1:15 PM

Weather:

TYPE OF FACILITY

Notified As: G, Trans, TSD, WAF, OSF | Regulated As: G, S, WAF

LDF? NO HPV? NO | 90-Day F/U Required?: YES ____ NO ✓

TYPE OF INSPECTION

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

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

RECEIVED
WMD RECORDS CENTER
APR 21 1994

NON-REGULATED STATUS N/A

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

PART A

Notification Date: 8 / 5 / 80, from (Initial) or (subsequent) Notification.

Initial Part A Date: 11 / 19 / 80 | Amended: 9 / 24 / 90

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

PART B PERMIT APPLICATION

Part B Permit Submitted: (Y) or N 11 / 9 / 88 | Final Permit Issued: 9 / 30 / 92

ENFORCEMENT N/A

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

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

ORDERS ISSUED N/A

CACO: ___/___/___ CAFO: ___/___/___ Consent Decree: ___/___/___

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

TSD FACILITY ACTIVITY SUMMARY

Activity by Process Code	On Part A?	Activity Conducted Prior to 1980?	Was Activity Ever Done?	Closed	Being done at Time of Insp.?	Exempt per 35 IAC, Sec.	On Annual Report 1992	1991	1990
S01	YES	YES	YES	NO	YES	N/A	YES	YES	YES
S02	YES	YES	YES	NO	YES	N/A	YES	YES	YES
R03	N/A	YES	YES	N/A	YES	725.101(c)(b)	NO	NO	NO

RECEIVED
AUG 23 1993
IEPA-DLP

IL 532-1834

OWNER	OPERATOR
Name SAFETY-KLEEN CORP	Name SAFETY-KLEEN CORP CHICAGO RC
Address 777 Big Timber Road	Address 1445 W. 42nd Street
City Elgin	City Chicago
State IL Zip 60173	State IL Zip 60609
Phone # 708/697-8460	Phone # 312/247-2828

PERSON(S) INTERVIEWED	TITLE	PHONE #
Alfred Aghagour	FACILITY MANAGER	312/247-2828
Ted Zajack	OPERATIONS MANAGER	"

INSPECTION PARTICIPANT(S)	AGENCY/TITLE	PHONE #
Anna Van Orden	IEPA / EPS	708/531-5900
Rich Reich	" "	"
Michael Cunningham	USEPA / ES	312/886-4464
Mirtha Capiro	USEPA / Geologist	312/886-7567

PREPARED BY	AGENCY/TITLE	PHONE #
Anna Van Orden	IEPA / EPS	708/531-5900

SUMMARY OF APPARENT VIOLATIONS

Area	Class	Section

Area	Class	Section

Area	Class	Section

Safety-Kleen Corp. Chicago RC
0316000053 ILD005450697
July 29, 1993

NARRATIVE

The Safety-Kleen Chicago RC(CRC) is an organic chemicals reclamation and recycling facility permitted to treat and store hazardous waste under a Part B Permit.

The CRC accepts organic chemicals and solvent wastes from industrial and commercial facilities. Reclamation and recycling operations involve either regeneration of the spent solvent or blending and processing of the material for use as a hazardous waste fuel.

Processes utilized in the reclamation of used solvents , solvent mixtures and other solvent containing wastes include neutralization, distillation, fractionation, liquid-liquid extraction and drying.

CRC handles primarily two accounts:

1) The Toll Business - The toll customer (generally industrial accounts) ships waste or off-specification material to the CRC for treatment. The facility reclaims the material to the customer's specifications and returns the material to the generator.

2) The Recycling Business - The recycling business consists of industrial solvents which come to the CRC from Safety-Kleen sales network. These waste materials are recycled at the facility to Safety-Kleen corporate specifications and the processed material is sold as product on the market.

HAZARDOUS WASTE UNITS

TYPE	ACTIVE	CLOSED	WASTES	SIZE/ CAPACITY	(D)IKED;(C)ONCRETE/DIR(T)/ (G)RAVEL FLOOR;TYPE OF SECONDARY CONTAINMENT
SO1	Y	N	Numerous, See Part B	108,900 Gallons	D; C; Catch Basin
SO2	Y	N	Numerous, See Part B	1,119,865 Gallons	D; C; Vault w/coating on concrete

RECEIVED
AUG 23 1993
IEPA-

HAZARDOUS WASTES

Still Bottoms - F001, F002, F003, F005
- Residual material from the distillation process
- Rate of generation: 25,000 - 50,000 gal/month
- Shipped to Safety-Kleen in Clarksville, MO for fuel blending or reclamation.
- Amount on site: 7001 gallons

Misc. Drummed Waste & Waste Filters - F001, F002, F003, F005
- Waste generated by various methods:
  - Cleaning out tanks
  - Used oil dry
  - Hose drippings
  - Cut drums in order to remove solid material
  - Used filters from filtering material from waste and product tanks
- Rate of generation: 30 - 45 drums/month
- Shipped to Safety-Kleen in Hebron, OH for fuel blending/ reclamation or further treatment.
- Amount on site: 135 drums

Remanifasted Waste - F001, F002, D001
- Waste generated not intended for reclamation on site but is stored temporarily until it is sent off-site for reclamation. Also, waste shipped to facility in error.
- Rate of generation: 5,000 gal/month
- Shipped to Safety-Kleen in Dolton, IL for fuel blending or further reclamation.
- Amount on site: 0

Spent Solvent - F005, D001
- Waste generated from two parts washers and one immersion cleaner unit.
- Rate of generation: 30 gal/month
- Shipped to Safety-Kleen in Franklin Park, IL for storage prior to off-site reclamation.
- Amount on site: 0

RQ Haz Liquid - D008
- Waste generated from bulking Glycol process
- Rate of generation: 25,000 - 30,000 gal/month
- Shipped to Safety-Kleen Dolton, IL for reclamation.
- Amount on site: 5,000 gallons

RCRA Part B Inspection Site # 0316000053

Section I: Containers

	Compliance	
A. Hazardous Waste Management Units	(YES)	NO
B. Waste Identification	(YES)	NO
C. Condition of Containers	(YES)	NO
D. Compatibility of Containers	(YES)	NO
E. Management of Containers	(YES)	NO
F. Inspections	(YES)	NO
G. Containment	(YES)	NO
H. Ignitables or Reactive Wastes	(YES)	NO
I. Special Requirements for Incompatible Wastes	(YES)	NO
J. General Operating Requirements	(YES)	NO
K. Closure Requirements	(YES)	NO

Description of violation: _____

Section II: Tank Systems

	Compliance	
B. Waste Identification	(YES)	NO
C. Containment and Detection of Releases	(YES)	NO
D. General Construction Requirements	(YES)	NO
E. General Operating Requirements	(YES)	NO
F. Tank System Certification	(YES)	NO
G. Response to Leaks or Spills	(YES)	NO

RECEIVED
AUG 23 1993
A-DLPC

Section II: Tank Systems (continued)

	Compliance	
H. Inspections	(YES)	NO
I. Reporting and Recordkeeping	(YES)	NO
J. Ignitables and Reactive Wastes	(YES)	NO
K. Special Requirements for Incompatible Wastes	(YES)	NO
L. Closure	(YES)	NO

Description of violations: _____

Section III: Reporting and Notification Requirements

	Compliance	
Containers	(YES)	NO
Tank Systems	(YES)	NO
Corrective Action	(YES)	NO
Standard Conditions	(YES)	NO
Additional Special Conditions	(YES)	NO

Description of violations: _____

Section IV: Corrective Action

	Compliance	
E. Financial Assurance for Corrective Action	(YES)	NO
F. Notification Requirements for and Assesment of Newly-Identified Solid Waste Management Unit(s)	(YES)	NO
G. Future Releases from SWMUs	(YES)	NO
H. Completion of Corrective Action	(YES)	NO

Description of violations: _____

Section V: Standard Conditions

	Compliance	
A. General Requirements	(YES)	NO
B. General Facility Standards	(YES)	NO
C. Preparedness and Prevention	(YES)	NO
D. Contingency Plan	(YES)	NO
E. Manifest System, Recordkeeping and Reporting	(YES)	NO
F. Closure	(YES)	NO
G. Land Disposal Restrictions	(YES)	NO

Description of violations: _____

OBSERVATIONS

Safety-Kleen is prepared to begin proposed Phase I RFI in the area North and West of container Storage Area #1 and area West of Tank Farm #2 and #3. They are waiting for EPA to give the go ahead to begin operations.

Facility has received their permit to store waste for the reclamation of Silver but they did not receive approval for the treatment system for Silver. Facility will not be handling photographic waste until approval for the treatment system is permitted.

Tank Farm #5 (Flammable & Combustible Liquids) is being updated with the installation of Foam/Water system. Also, the construction of the fire suppression and alarm system is progressing and should be completed by December 4, 1993.

At the time of the inspection, this facility was regulated as a generator, a storage facility and marketer of hazardous waste fuel. The facility appeared to be in compliance with all applicable RCRA regulations and their Part B Permit requirements.

Facility Name: SAFETY-KLEEN CHICAGO RC

USEPA #: D005450697

IEPA #: 0316000053

WASTE DISPOSITION FORM

Waste Name (include haz & waste for which no determination has been made)	Generating Process (For waste gen. on site. N/A for TSD)	Date of Last Analysis	USEPA Haz Waste #	* On 8700-12	* On 3510-3	On Annual Report for: (Circle if present; cross out if not present) * 19 92	* 19 91	* 19 90	Amount on Site	Rate of Generation	Last Manifested Shipment	Disposition
STILL BOTTOMS	Residual Material From Distillation Process	Every shipment	F001 F002 F003 F005	YES	YES	G / F	G / F	G / F	7001 gal	25-50,000 gal/mo	7/9/93	S-K Clarksville MO, FOR BLENDING + RECLAMATION
misc. DRUMMED WASTE	- Cleaning out tank - Used Oil Dry - Hose Drippings	↓	F001 F002	YES	YES	G / F	G / F	G / F	135 Drums	30-45 Drums	3/9/93	S.K. Hebron, OH
WASTE FILTERS	Used to filter waste + product as material enters tanks	↓	F001 F002 F003 F005	YES	YES	G / F	G / F	G / F	↓	a month ↓	↓	for blending / reclamation, treatment or Incineration
Remanifested Waste	- Errors - Temp. Storage	↓		YES	YES	G / F	G / F	G / F	Ø	5,000 gal/mo	7/7/93	S-K - Clarksville, MO.
Spent Solvent	2 parts washers 1 immersion cleaner	↓	F005 D001	YES	YES	G / F	G / F	G / F	Ø	30 gal month	7/13/93	S-K Franklin Park blending / reclamation
Glycol Processing HAZ Liq.	Bulking	↓	D008	YES	YES	G / F	G / F	G / F	5000 gal.	25,000-30,000 gal/mo	7/12/93	S-K Dolton Reclamation
						G / F	G / F	G / F				
						G / F	G / F	G / F				
						G / F	G / F	G / F				
						G / F	G / F	G / F				

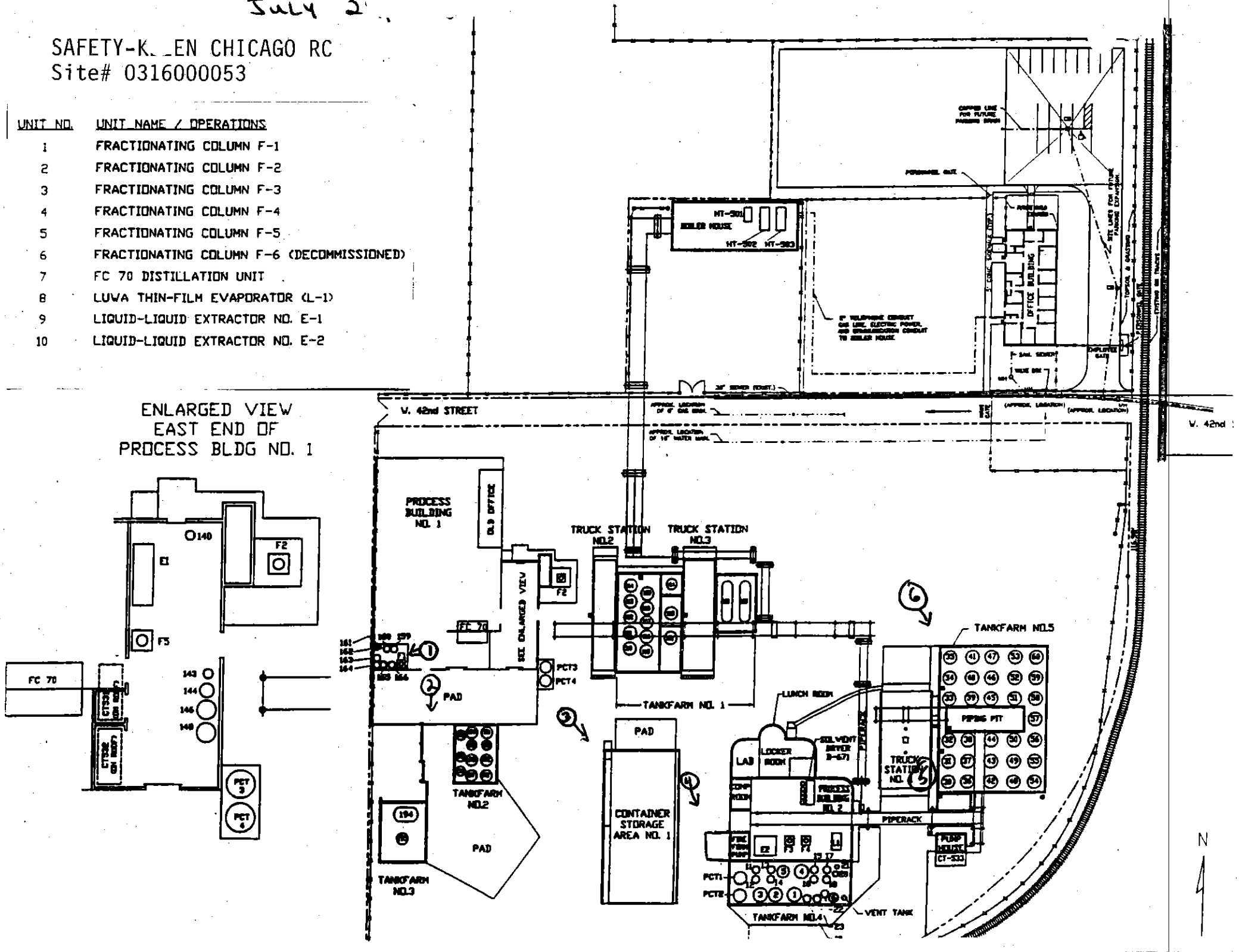
* All "NO" responses must be explained in narrative.

IL 532 1838

July 2

SAFETY-K_EN CHICAGO RC
Site# 0316000053

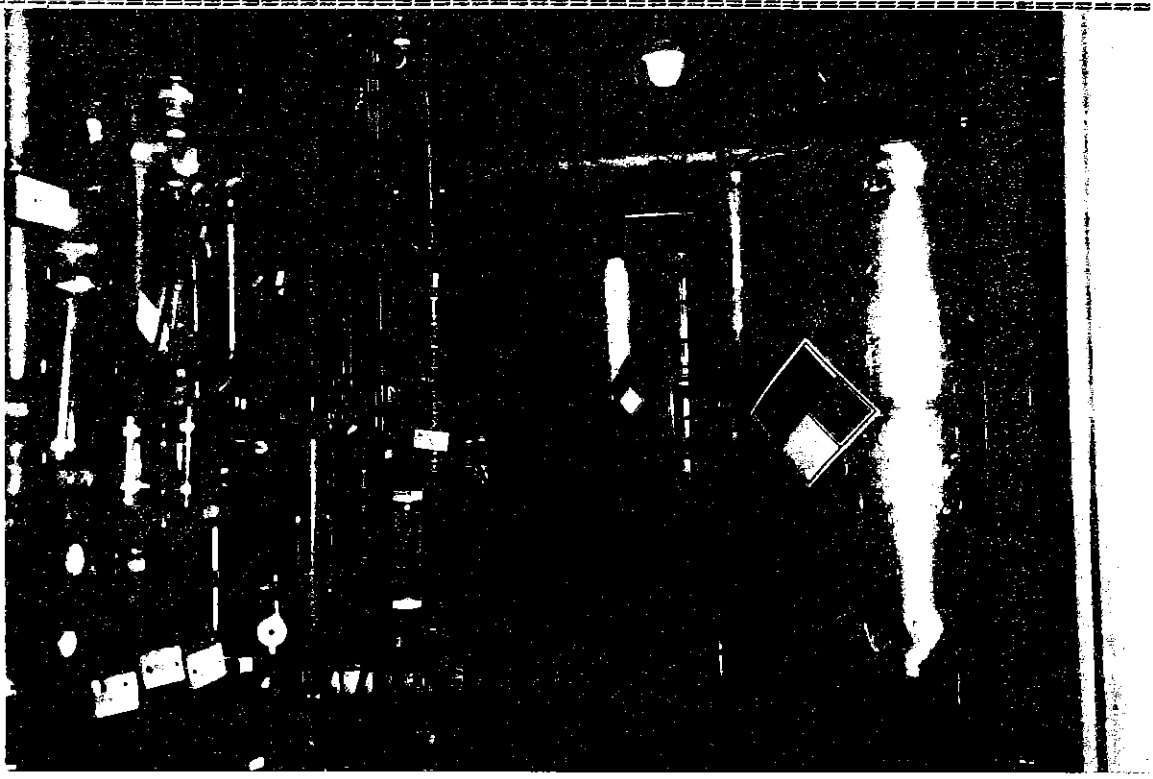
UNIT NO.	UNIT NAME / OPERATIONS
1	FRACTIONATING COLUMN F-1
2	FRACTIONATING COLUMN F-2
3	FRACTIONATING COLUMN F-3
4	FRACTIONATING COLUMN F-4
5	FRACTIONATING COLUMN F-5
6	FRACTIONATING COLUMN F-6 (DECOMMISSIONED)
7	FC 70 DISTILLATION UNIT
8	LUWA THIN-FILM EVAPORATOR (L-1)
9	LIQUID-LIQUID EXTRACTOR NO. E-1
10	LIQUID-LIQUID EXTRACTOR NO. E-2



Illinois Environmental Protection Agency Photographs

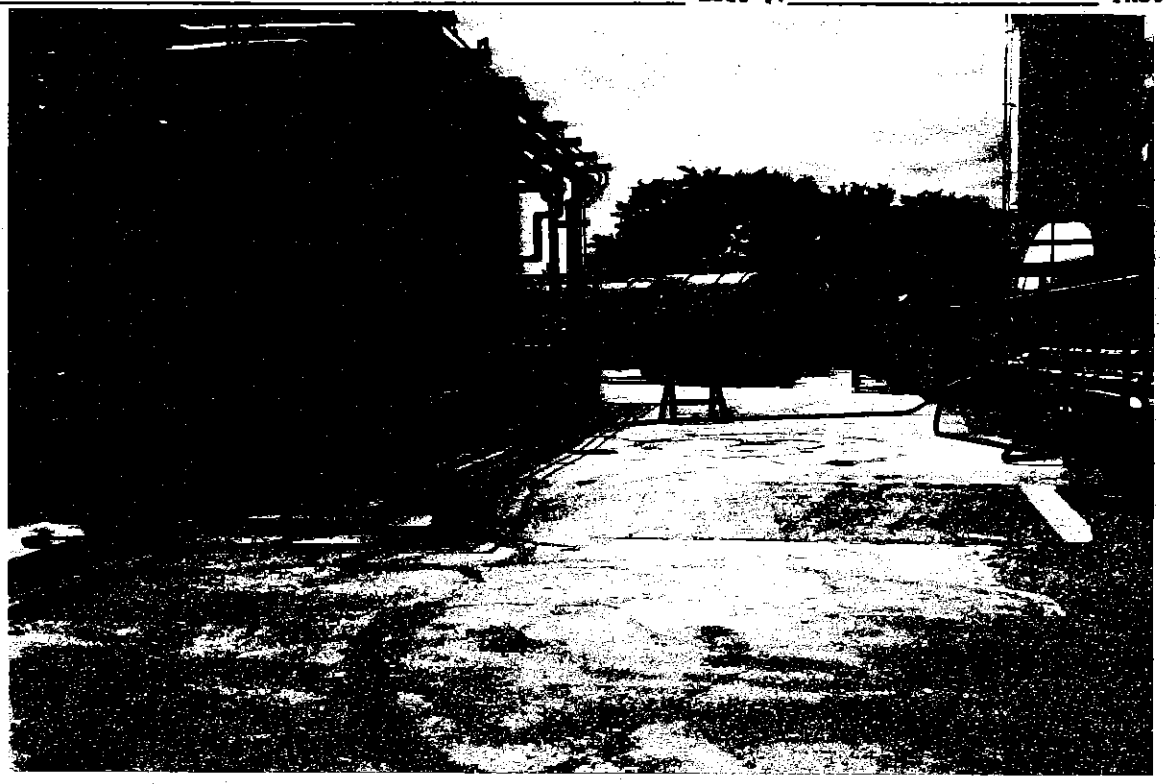
Site Name: Safety-Kleen Corp. Chicago RC IEPA #: 0316000053

Date: July 29, 1993 Time: 9:00AM -1:15PM Photograph By: Anna VanOrden (AVO)



Comments: FACING WEST - DISTILLATION AREA

Roll #: 94-038 Photo #: 1



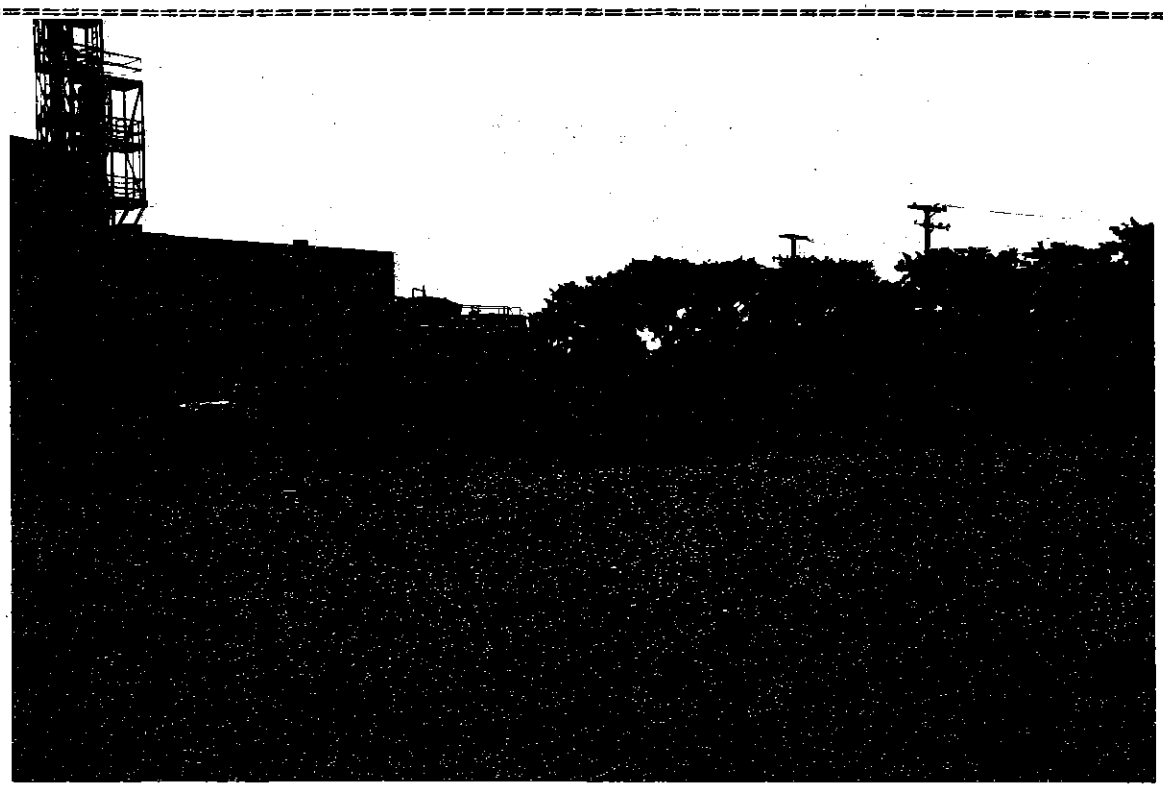
Comments: FACING SOUTH - ON (L) TANK FARM 2 + (R) TANK FARM 3

Roll #: 94-038 Photo #: 2

Illinois Environmental Protection Agency Photographs

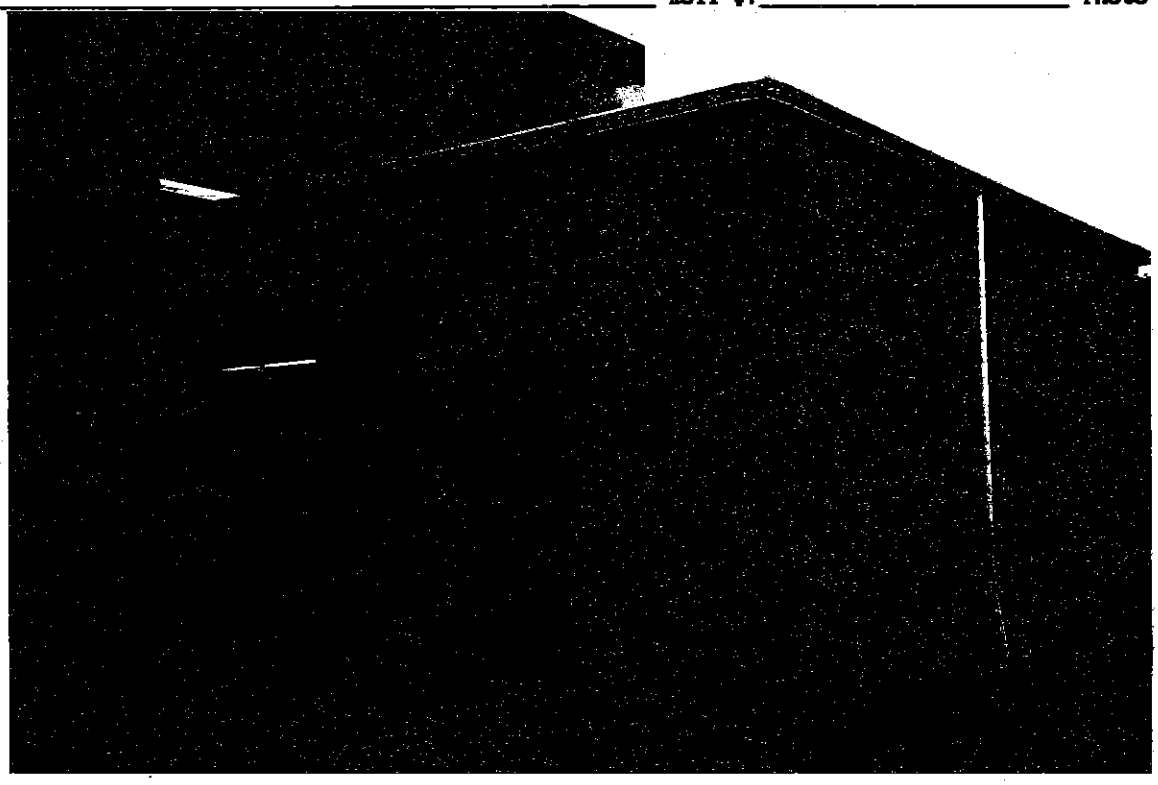
Site Name: Safety-Kleen Corp. Chicago RC IEPA #: 0316000053

Date: July 29, 1993 Time: 9:00AM -1:15PM Photograph By: Anna VanOrden (AVO)



Comments: FACING SOUTHEAST - CONTAINER STORAGE AREA #1

Roll #: 94-038 Photo #: 3



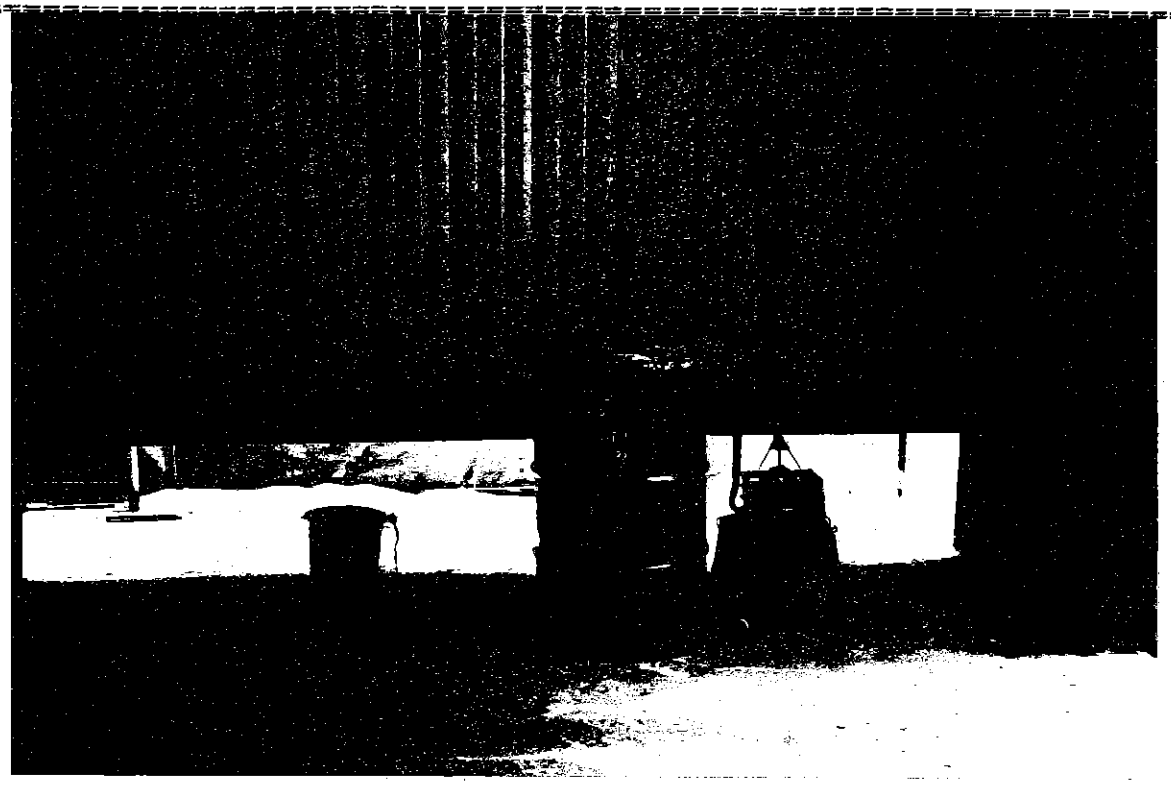
Comments: FACING SOUTHEAST - NEW EXTENSION FOR FIRE SUPPRESION AND ALARM SYSTEM

Roll #: 94-038 Photo #: 4

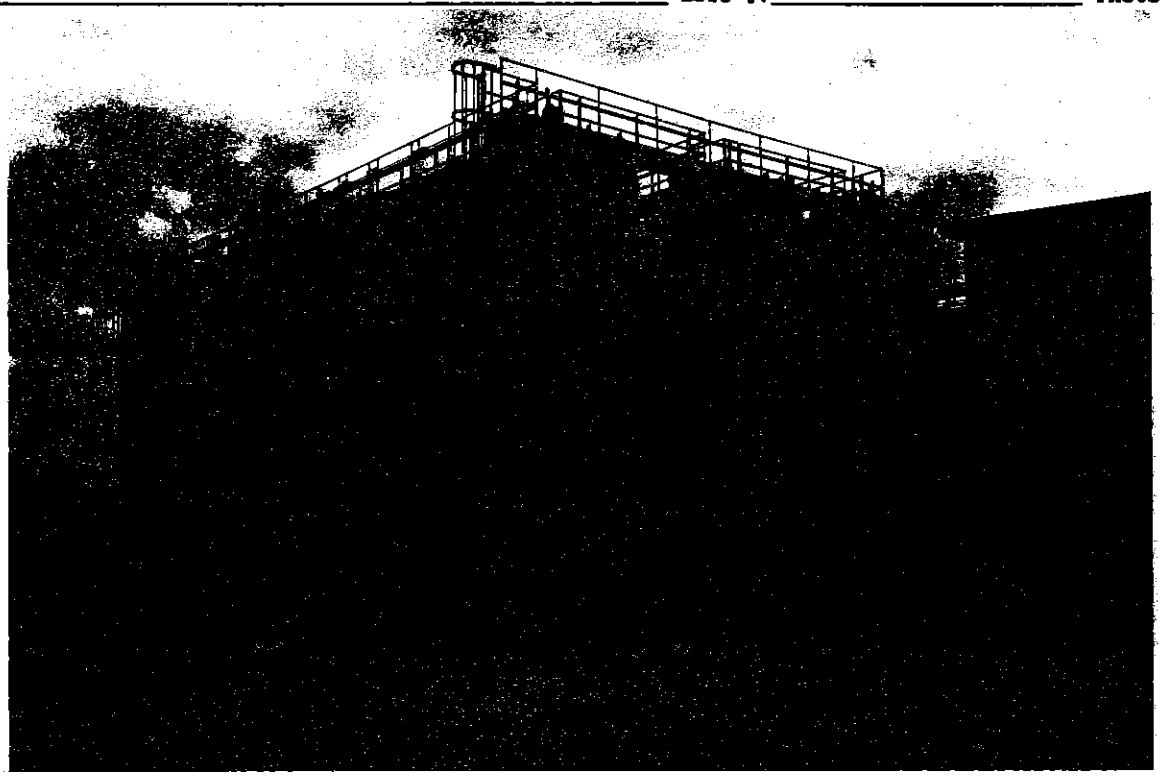
Illinois Environmental Protection Agency Photographs

te Name: Safety-Kleen Corp. Chicago RC IEPA #: 0316000053

: July 29, 1993 Time: 9:00AM -1:15PM Photograph By: Anna VanOrden



Comments: FACING EAST- SATELLITE ACCUMULATION AREA IN TRUCK STATION #5 Roll #: 94-038 Photo #: 5



Comments: FACING SOUTHEAST - TANK FARM #5 - UPGRADING OF TANK FARM WITH FOAM/WATER SYSTEM Roll #: 94-038 Photo #: 6

7/29/93

REVISION 1 (8/15/88)

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
				PART 722 **GENERATOR STANDARDS** **Subpart A: General**				
OTH	1			**Section 722.111: Hazardous Waste Determination**	✓			
				Has the generator determined if the solid waste it generates is a hazardous waste? Yes ___ No ___				
				Did the generator follow the procedures specified in this section in making its determination? Yes ___ No ___				
OTH	1			**Section 722.112: USEPA Identification Number**	✓			
			a	Has the generator obtained a USEPA identification number? Yes ___ No ___				
			c	Has the generator offered his hazardous waste only to transporters or to treatment, storage or disposal facilities that have received a USEPA identification number? Yes ___ No ___				

RECEIVED

IL 532-1592

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

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No
MAN	2			**PART 722** **GENERATOR STANDARDS** **Subpart B: The Manifest** **Section 722.120: General Requirements**	✓			
			a	Has the generator who transports, or who offers its hazardous waste for transportation off-site for treatment, storage or disposal prepared a uniform hazardous waste manifest? Yes ✓ No ____ **Note: If the generator has not used a manifest, check "No" in the Apparent Compliance Column and skip to 722.130.**				
			b	Did the generator designate on the manifest one facility which is permitted to handle the hazardous waste therein described? Yes ✓ No ____ **Note: The generator may also designate an alternate facility permitted to handle the hazardous waste in the event an emergency prevents delivery of the hazardous waste to the primary designated facility.**				
			d	In any instances where the transporter was unable to deliver the hazardous waste to the designated or alternate permitted facility, has the generator designated another permitted facility or instructed the transporter to return the waste? Yes ✓ No ____				

532-1592

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
MAN	2			**Section 722.121: Acquisition of Manifests**	✓			
			a	Did the generator use the manifest supplied by the Agency for hazardous waste going for treatment, storage or disposal in Illinois? Yes ✓ No ____ N/A ____				
			b	For hazardous waste going outside Illinois for treatment, storage or disposal, has the generator used the manifest supplied by the Agency if the State to which the hazardous waste is being shipped does not supply and require the completion of its own State manifest? **or** For hazardous waste going outside Illinois for treatment, storage or disposal, has the generator used the manifest required by the State to which the hazardous waste is being shipped? Yes ✓ No ____ N/A ____				
MAN	2			**Section 722.122: Number of Copies** Does the manifest the generator is using consist of at least six copies (plus one copy for each additional transporter)?	✓			
MAN	2			**Section 722.123: Use of the Manifest** For each manifest received, has the generator: 1) Signed the certificate by hand? Yes ✓ No ____ 2) Obtained the handwritten signature and the date of acceptance by the initial transporter? Yes ✓ No ____	✓			

(1) 532-1592

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
				3) Retained one copy as required by Section 722.140(a), Recordkeeping? Yes ✓ No ___				
				4) Apparently sent a copy (Part 5 for Illinois manifests) to the Agency within two working days? Yes ✓ No ___				
				NOTE: Obtain a copy of any manifest which is not in compliance with the requirements of this subsection. If copies are unobtainable, log manifest #s.				
			b	Has the generator apparently given the remaining copies of the manifest to the transporter? Yes ✓ No ___				
			c	Has the generator followed the procedures prescribed in Section 722.123(c) for manifesting bulk shipments of hazardous waste by water? Yes ___ No ___ N/A ✓				
			d	Has the generator followed the procedures prescribed in Section 722.123(d) for manifesting bulk shipments of hazardous waste by rail? Yes ___ No ___ N/A ✓				

FL 532-1502

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
				PART 722 **GENERATOR STANDARDS** **Subpart C: Pre-Transport Requirements**				No waste ready for transportation off-site.
OTH	1	X		**Section 722.130: Packaging**			✓	
				Is waste which is ready for transportation off-site packaged in accordance with 49 CFR, Parts 173, 178 and 179?				
OTH	1	X		**Section 722.131: Labeling**			✓	
				Is each package of hazardous waste which is ready for transportation off-site labeled in accordance with 49 CFR Part 172?				
OTH	1	X		**Section 722.132: Marking**			✓	
			a	Is each package of hazardous waste which is ready for transportation off-site marked in accordance with 49 CFR Part 172? Yes ____ No ____				
			b	Is each package of hazardous waste which is ready for transportation off-site marked with: - The generator's name and address? Yes ____ No ____ - The manifest document number associated with the container? Yes ____ No ____ - The words "Hazardous Waste - Federal Law Prohibits Improper Disposal. If found contact the nearest police, or public safety authority or the U.S. Environmental Protection Agency"? Yes ____ No ____				

TI 537-1502

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 722.133: Placarding** Does the generator have, for the waste it generates, the proper placards to: - Placard the transport vehicle, or - Offer to the first transporter, according to 49 CFR, Part 172, Subpart F? **NOTE: If the placards are provided by the transporter, then mark the N/A Column and use Comment field to explain.**			✓	Transporter supplies placards.
OTH	1	X		**Section 722.134: Accumulation Time** **NOTE: If the TSD checklist will be completed and the facility only accumulates wastes for 90 days or less for Section 722.134 complete page GEN-C-2(a) then skip to TSD checklist.** **NOTE: A generator who is also a TSD would be subject to this section for any waste which is not identified for storage on the facility's Part A, or which is being accumulated outside a "permitted" storage area.**			✓	FACILITY HAS PART B PERMIT FOR STORAGE OF HAZARDOUS WASTE.
			a	**For waste in containers, has** the generator complied with the requirements of 35 Ill. Adm. Code 725, Subpart I: Use and Management of Containers listed below: **NOTE: If no wastes in containers, mark "N/A" and skip to Section 725.291 of the Generator checklist.**				

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
OTH	1	X		**Section 722.134: Accumulation Time**			✓	
				NOTE: A generator who is also a TSD would be subject to this section for any waste which is not identified for storage on the facility's Part A, or which is being accumulated outside a "permitted" storage area.				
			a1	For waste in containers, has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subpart I?				
				and/or				
				For waste in tanks, has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subpart J except Section 725.297(c) and 725.300? Yes ____ No ____				
			a2	For waste in containers, has the generator marked and made visible for inspection on each container, the date upon which accumulation began? Yes ____ No ____ N/A ____				
			a3	For waste in containers and tanks, has the generator marked or labeled each with the words "Hazardous Waste"? Yes ____ No ____				
			a4	Has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subparts C and D, and Section 725.116? Yes ____ No ____				

H 532-1592

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
				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 ____ 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 ____ 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 ____				

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No
				SATELLITE ACCUMULATION				
			c1	Is the generator who accumulates hazardous waste in containers at or near any point of generation where wastes initially accumulate and which is under the control of the operator of the process generating the waste:				
				- Limiting such accumulation to 55 gallons (one quart of acutely hazardous waste listed in 35 Ill. Adm. Code 721.133)? Yes ✓ No ___ N/A ___				
				- Complying with the requirements of:				
				1) 35 Ill. Adm. Code 725.271, Condition of Containers? Yes ✓ No ___	✓			
				2) 35 Ill. Adm. Code 725.272, Compatibility of Waste with Containers? Yes ✓ No ___				
				3) 35 Ill. Adm. Code 725.273(a), Management of Containers - requiring that the containers be stored closed except when waste is being added or removed? Yes ✓ No ___				
				- Marking the containers with the words "Hazardous Waste" or with words that identify the contents of the containers? Yes ✓ No ___				

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
			c2	Has the generator who accumulates more than 55 gallons (one quart of acutely hazardous waste listed in 35 Ill. Adm. Code 721.133(e)) with respect to the amount of excess waste, complied with the requirements in Section 722.134(a) within three days? Yes ____ No ____ Are the containers with the excess amounts marked with the date accumulation began? Yes ____ No ____ During the three day period, is the generator continuing to comply with the requirements of Section 722.134(c)(1)? Yes ____ No ____				No excess accumulation

II 532-1582

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			**PART 722** **GENERATOR STANDARDS** **Subpart D: Recordkeeping and Reporting** **Section 722.140: Recordkeeping**	✓			
				Has the generator retained for a period of three years:				
			a	- A copy of each signed manifest? Yes ✓ No ____				
			b	- A copy of each annual report? Yes ✓ No ____				
			b	- A copy of each exception report? Yes ____ No ____ N/A ✓				
			c	- Copies of test results, waste analyses or other determinations made in accordance with Section 722.111? Yes ✓ No ____ N/A ____				
			d	Does a generator who is involved in any unresolved enforcement action continue to maintain the records required in 722.140(a) thru (c)? Yes ____ No ____ N/A ✓				
			d	If the Director has requested that the records required in 722.140(a) thru (c) be maintained for a period longer than three years, has the generator continued to maintain them? Yes ____ No ____ N/A ✓				

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
OTH	2			**Section 722.141: Annual Reporting**	✓			
				Has the generator who ships waste off-site to a treatment, storage or disposal facility within the United States prepared and submittted a copy of an annual report, as supplied by the Agency, to the Agency by March 1 for the preceeding calendar year?				
				NOTE: A generator who treats, stores or disposes of hazardous waste on-site must also submit an annual report as a TSD in accordance with the requirements of 35 Ill. Adm. Code 702, 703, 724, 725 and 40 CFR 266.				
MAN	1			**Section 722.142: Exception Reporting**			✓	No exceptions.
			a	Has the generator who has not received a signed copy of the manifest from the designated TSD within 35 days of the date the waste was accepted by the initial transporter determined the status of its hazardous waste? Yes ____ No ____				
			b	Has the generator who has not received a signed copy of the manifest from the designated TSD within 45 days of the date the waste was accepted by the original transporter submitted an exception report to the Director? Yes ____ No ____				
			b	Does any exception report submitted to the Director contain the following:				
				- A legible copy of the manifest for which the generator does not have confirmation of delivery; and				

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
				- A cover letter signed by the generator or his authorized representative explaining the efforts taken to locate the hazardous waste and the results of those efforts? Yes ____ No ____ N/A ____				
OTH	1			**Section 722.143: Additional Reporting** Has the generator submitted all additional reports concerning quantities and disposition of wastes as required by the Director?			✓	NONE REQUIRED

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
OTH	1/2			**PART 722** **GENERATOR STANDARDS** **Subpart E: Exports of Hazardous Waste** **Section 722.152: General Requirements** Has the facility made any shipments of hazardous waste outside the United States? Yes ____ No ✓ **NOTE: If "No", skip Subpart E. If "Yes", answer the next question.** Has the generator complied with the requirements in Sections 722.152 through 722.157? Yes ____ No ____ **NOTE: If the answer is "No", explain in detail why the firm did not meet the requirements. Review the requirements prior to answering this question. When citing a violation of this Subpart, identify the specific section violated in the Narrative as well as in the Comments.**			✓	No Exports.

IL 532-1592

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
MAN	1			**PART 722** **GENERATOR STANDARDS** **Subpart F: Imports of Hazardous Waste** **Section 722.160: Imports of Hazardous Waste**			✓	No Imports.
			b1	Has the person importing hazardous waste met the manifest requirements of Section 722.120 except that: In place of the generator's name, address and USEPA identification number, the name and address of the foreign generator and the importer's name, address and USEPA identification number are used; **and**				
			b2	Has the importer or his agent signed the manifest in place of the generator; **and**				
			b2	Has the importer or his agent obtained the signature of the initial transporter? Yes ____ No ____ N/A ____				
			c	Is the person importing hazardous waste using manifests obtained from the Agency? Yes ____ No ____				

TI 532-1592

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
OTH	2	X		**PART 722** **GENERATOR STANDARDS** **Subpart G: Farmers** **Section 722.170: Farmers** Is a farmer who is disposing of waste pesticides from his own use which are hazardous wastes: - Triple rinsing each emptied pesticide container in accordance with 35 Ill. Adm. Code 727.107(b)(3), Residues of Hazardous Waste in Empty Containers? Yes ____ No ____ N/A ____ - Disposing of pesticide residue on his own farm in a manner consistent with the disposal instructions on the pesticide label? Yes ____ No ____ N/A ____ **NOTE: If the answer to either of the preceeding questions is "No", the farmer is subject to the requirements of this Part (722) and to the applicable portions of 35 Ill. Adm. Code 702, 703 and 725 (724). Complete the applicable inspection form(s).**			✓	No Farming

IL 532-1502
IDPH 356 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 726 **STANDARDS FOR THE MANAGEMENT OF SPECIFIC HAZARDOUS WASTE AND SPECIAL TYPES OF HAZARDOUS WASTE MANAGEMENT FACILITIES** **Subpart D: Hazardous Waste Burned for Energy Recovery** **NOTE: Facilities that burn hazardous waste for energy recovery (excluding Subpart O incinerators) are subject to this subpart. However, used oil which has a hazardous characteristic is not regulated under Subpart D, but rather Subpart E. Materials identified in 721.104 and 721.106(a)(3)(E) through (I), and hazardous waste subject to 721.105 (SQG) are exempt from this subpart.**				
OTH		X		**Section 726.132: Standards Applicable to Generators of Hazardous Waste Fuel**	✓			
	I		a	Is the generator in compliance with 722 requirements (complete and attach the GEN or RR GEN checklist)? Yes ___ No ___ N/A ___				
OTH				**Section 726.133: Standards Applicable to Transporters of Hazardous Waste Fuel**			✓	NOT A TRANSPORTER
	I			Is the transporter in compliance with 723 requirements (complete and attach the TR checklist)? Yes ___ No ___ N/A ✓				
OTH		X		**Section 726.134: Standards Applicable to Marketers of Hazardous Waste Fuel**	✓			
OTH	II		a	Is the marketer marketing hazardous waste fuel only to persons who have notified USEPA of their hazardous waste fuel activities and have obtained a USEPA identification number? Yes ✓ No ___ N/A ___				
				and				

Area	Class	90 Day F U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
				If the fuel is burned, only to persons who burn the fuel in boilers or industrial furnaces identified in 726.131(b)? Yes ✓ No ___ N/A ___				Cement Kilns
	II		b	Has the marketer notified USEPA of its hazardous waste fuel activities (even if the marketer has previously notified USEPA of its other hazardous waste activities and has obtained a USEPA identification number)? Yes ✓ No ___ N/A ___				
	I		c	Is the marketer in compliance with 702, 703, 722.134, 724 Subparts A through L, and 725 Subparts A through L (complete and attach the necessary checklist(s) PER, TSD, etc.)? Yes ✓ No ___ N/A ___				FACILITY OPERATING UNDER PART B
	I		d	For off-site shipments, is the marketer in compliance with 722 (complete and attach the GEN checklist)? Yes ✓ No ___ N/A ___				
	II		e	Required Notices. Has the marketer obtained a notice from the receiver of the hazardous waste fuel (a burner or subsequent marketer) that they have: notified USEPA (3010 RCRA), re-notified USEPA of waste-as-fuel activity, and if the waste fuel is to be burned, that it is burned only in an industrial furnace or boiler per 726.131(b). Yes ✓ No ___ N/A ___				
	II		e	Before accepting hazardous waste fuel, has the receiver (buyer) provided notices to the seller as outlined in the previous question? Yes ✓ No ___ N/A ___				
	II		f	Has the marketer kept a copy of each certification, sent or received, for three years? Yes ✓ No ___ N/A ___				

Area	Class	90 Day F-U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No
OTH				**Section 726.135: Standards Applicable to Burners of Hazardous Waste Fuel**			✓	FACILITY DOES NOT BURN H.W. FUEL
	I		a	Is the owner of an industrial furnace or boiler complying with the prohibitions in Section 726.131(b)? Yes ___ No ___ N/A ___				
	II		b	Has the USEPA been re-notified as to the burner's hazardous waste fuel activities? Yes ___ No ___ N/A ___				
	I		c	Does the burner accumulate/store hazardous waste fuel for a time period exceeding 90 days? Yes ___ No ___				
				NOTE: If "Yes", then the facility is subject to 702, 703, and 725 A through L (or 724 A through L for new facilities) and the appropriate checklist(s) must be completed. If "No", the facility must comply with 722.134 Accumulation Time.				
	I		c	Is the facility in compliance with 722.134? Yes ___ No ___ N/A ___				
	II		d	Prior to receiving the first shipment of hazardous waste fuel from a marketer, has the owner or operator of the industrial furnace or boiler provided the certification required in Sec. 726.135(d)? Yes ___ No ___ N/A ___				
	II		e	Has the burner kept a copy, for three years, of each certification notice that was sent to the marketers? Yes ___ No ___ N/A ___				

II 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				**PART 726** **STANDARDS FOR THE MANAGEMENT OF SPECIFIC HAZARDOUS WASTE AND SPECIAL TYPES OF HAZARDOUS WASTE MANAGEMENT FACILITIES** **Subpart E: Used Oil Burned for Energy Recovery**				
				Section 726.143: Standards Applicable to Marketers of Used Oil Burned for Energy Recovery				
			b1	Has the marketer conducted an analysis of the used oil? Yes ____ No ____ N/A ____				
				NOTE: If "No", then Subpart E applies.				
				Does the oil exceed any of the specifications listed in 726.140(e)? Yes ____ No ____				
				NOTE: If "No", then Subpart E does not apply except for 726.143(b)(1) and (b)(6).				
	I		b2	Does the marketer only market the off-specification used oil to burners that have: notified USEPA of their used oil activities, have USEPA ID #, and have the proper combustion devices pursuant to 726.141(b)? Yes ____ No ____				
	II		b3	Has the marketer re-notified USEPA as to used oil management activities? Yes ____ No ____				
	II		b4	Does the marketer have an invoice system such that receiving facilities get an invoice with all the information required in 726.143(b)(4)? Yes ____ No ____				

Area	Class	90 Day F U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No
				PART 726 **STANDARDS FOR THE MANAGEMENT OF SPECIFIC HAZARDOUS WASTE AND SPECIAL TYPES OF HAZARDOUS WASTE MANAGEMENT FACILITIES** **Subpart F: Recyclable Materials Utilized for Precious Metals Recovery** **NOTE: Generators, transporters or storers of recyclable gold, silver, platinum, paladium, irradium, osmium, rhodium, or ruthenium are subject to regulation under this subpart.**				AT THIS time facility has a permit to store but not treat. Facility is NOT accepting waste for reclamation of silver until permit approval for treatment
OTH		X		**Section 726.170: Applicability and Requirements**			✓	
	II		b	Has the USEPA been notified pursuant to 3010 of RCRA? Yes ____ No ____				
	I			If a generator, then are they in compliance with 722 Subpart B (the manifest)? Yes ____ No ____ N/A ____				
	I			If a transporter, then are they in compliance with 722.120 and 722.121 (manifest)? Yes ____ No ____ N/A ____				
	I			If a storer, then are they in compliance with 725.171 and 725.172 (use of the manifest and manifest discrepancies)? Yes ____ No ____ N/A ____				
			c	If a storer, are records that document they are <u>not</u> accumulating the materials speculatively being kept? Yes ____ No ____ N/A ____				
	I		d	If recyclable materials that <u>are</u> accumulated speculatively (as defined in 721.101(c)), then is the facility in compliance with 722 through 725, 702, 703, and 705 (complete the necessary checklist(s))? Yes ____ No ____ N/A ____				

Area	Class	90 Day F U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No
				PART 726 **STANDARDS FOR THE MANAGEMENT OF SPECIFIC HAZARDOUS WASTE AND SPECIAL TYPES OF HAZARDOUS WASTE MANAGEMENT FACILITIES** **Subpart G: Spent Lead-Acid Batteries Being Reclaimed** **NOTE: These regulations apply to persons who reclaim spent batteries. Those who collect, but don't reclaim them are not subject to regulation.**				
OTH		X		**Section 726.180: Applicability and Requirements**				
	II		b	Has the USEPA been notified pursuant to 3010 of RCRA? Yes ____ No ____				
	I			Is the facility in compliance with 724/725 Subparts A, B (excluding 724.113), C, D, E (excluding 724.171 and 724.172), and F through L (complete and attach the TSD checklist)? Yes ____ No ____				
	I			Is the facility in compliance with 702, 703 and 705 (complete and attach the necessary checklist(s)? Yes ____ No ____				

RCRA LAND DISPOSAL RESTRICTIONS INSPECTION

I. General Information

Facility: SAFETY-KLEEN CORP. CHICAGO RC

U.S. EPA ID No.: ILD00545069 0316000053

Street: 1445 W. 42nd Street

City: Chicago State: IL Zip: 60609

Telephone: 312/247-2829

Inspection Date: 7/29/93 Time: 9:00 Am - 1:15 P (am/pm)

Weather Conditions: _____

Inspectors:

Name	Agency/Title	Telephone
Anna Van Orden	IEPA / EPS	708/531-5900
Rich Reich	" "	"
Michael Cunningham	USEPA / ES	312/886-4464
Mirtha Capiro	USEPA / Geologist	312/886-7567

Facility Representatives: Alfred Aghapour S-K FACILITY MNG. 312/247-28[illegible]

TEO Zajack S-K OPERATIONS MNG.

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

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

* See Appendix A

INSPECTION SUMMARY

Processes That Generate LDR Wastes:

Distillation Unit
Fractionation Units
Liquid-Liquid Extraction Units.
Waste Water Treatment Units.
Filtering

Treatment residuals are put back into the solvent recovery process if possible. Eventually these residuals are sent off-site for treatment or incineration.

LDR Waste Management:

Waste streams generated on-site & off-site are stored in containers or tanks.

All wastes generated on-site are shipped off-site for treatment or incineration.

Summary:

No violations of the land disposal restriction regulations were observed at the time of the inspection.

Signature: Anne Van Orden

RCRA LAND DISPOSAL RESTRICTIONS INSPECTION

II. WASTE IDENTIFICATION

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

1. F001 through F005 spent solvents:
   F001 F002 F003 F005

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

3. California List Wastes (See Appendix A):
   Spent Solvents

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

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

6. Third Third Wastes [40 CFR 268.12]**:
   D001

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

B. Waste Code Determination

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

   Yes ✓ No___

   If no, list below:

Assigned Classification	Correct Classification

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

Comments: _____

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

Yes ✓ No ___ NA ___

Comments ___

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

Yes ___ No ___ NA ✓

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

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

Yes ___ No ___

Comments ___

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

N/A

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

Yes ___ No ___ List ___

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

Yes ___ No ___ List ___

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

Yes ___ No ___ List ___

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

Yes ___ No ___ List ___

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

Yes ___ No ___ List ___

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

Yes ___ No ___ List _____

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

Yes ___ No ___ List _____

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

Yes ___ No ___ List _____

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

Yes ___ No ___ List _____

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

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

Yes ___ No ___ List _____

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

Yes ___ No___ List _____

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

RCRA LAND DISPOSAL RESTRICTION INSPECTION

III. GENERATOR REQUIREMENTS

A. Treatability Group/Treatment Standard Identification*

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

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

Yes ✓ No ___ NA ___

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

Waste Code	Wastewater*	Nonwastewater
F001	___	✓
F002	___	✓
F003	___	✓
F005		✓

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

Comments _____

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

Yes ___ No ___ NA ✓

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

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

Comments _____

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

3. First, Second, and Third Third Wastes:

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

Yes ✓ No ___ NA ___

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

Waste Code	Subcategory	Wastewater*	Nonwastewater
____	____	____	____
____	____	____	____
____	____	____	____

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

Comments_____

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

Yes ✓ No ___ NA ___

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

Yes ___ No ___ NA ✓

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

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

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

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

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

Yes ___ No ___ NA ✓

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

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

a. Liquid hazardous wastes containing PCBs ≥50 ppm

Yes ___ No ___ NA ✓

If yes, check the appropriate treatability group:

___ 50 to 500 ppm PCBs
___ ≥500 ppm PCBs

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

Yes ___ No ___ NA ✓

If yes, check the appropriate treatability group:

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

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

Yes ___ No ___ NA ✓

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

Yes ___ No ___ NA ✓

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

Yes ___ No ___ NA ✓

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

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

Comments_____

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

Yes ___ No ✓ NA ___

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

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

Comments_____

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

Yes ___ No ✓

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

Yes ___ No ___

Comments _____

B. **Waste Analysis**

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

Yes ✓ No ___

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

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

Yes ___ No ___

Comments _____

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

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

a. Knowledge of waste:

Yes ✓ No ___

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

All shipments are analyzed on site.
GC, PCBs, Spec. Grav., pH, Hg, H_2O, etc.

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

Yes ___ No ___ NA ✓

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

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

_____

_____

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

Yes ___ No ___ NA ✓

*See Appendix C for exceptions.

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

_____

_____

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

Yes ___ No ___ NA ✓

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

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

_____

_____

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

Yes ___ No ✓ (If No, go to 4.)

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

Yes ___ No ___

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

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

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

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

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

Yes ___ No ___

Comments _____

4. Dilution Prohibition [40 CFR 268.3]:

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

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

Yes ___ No ✓ (If No, go to b.)

List the wastes _____

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

Yes ___ No ___

Comments _____

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

Yes ___ No ✓ (If No, go to c.)

Check appropriate category:

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

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

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

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

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

_____

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

Yes ___ No ✓

Comments _____

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

Yes ___ No ___ NA ✓

C. Management

1. On-Site Management

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

Yes ✓ No ___

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

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

Comments_____

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

Yes ___ No ___ NA ✓

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

Yes ___ No ___ NA ✓

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

2. Off-Site Management: Waste Exceeds Treatment Standards

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

Yes ✓ No ___ (If No, go to 3.)

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

Waste Code	Receiving Facility
D001	S-K Dolton, IL
F001	S-K Franklin Park, IL
F002	SK Clarksville, MO
F003	
F005	Hebron, OH

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

Yes ✓ No ___ (If No, go to 3.)

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

Yes ___ No ___ NA ___

b. Is a notification sent with each waste shipment?

Yes ✓ No ___

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

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

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

Waste Code	Subsequent Handler
___	___
___	___
___	___

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

Yes ___ No ___

3. Off-Site Management: Waste Meets Treatment Standards

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

Yes ___ No ✓ (If No, go to 4.)

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

Waste Code	Receiving Facility
___	___
___	___
___	___

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

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

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

Yes ___ No ___

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

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

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

Waste Code	Subsequent Handler
___	___
___	___
___	___

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

Yes ___ No ___

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

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

Complete the following table:

Waste Code	Receiving Facility
___	___
___	___
___	___

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

Yes ___ No ___

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

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

Yes ___ No ✓ (If No, go to 5.)

Complete the following table:

Waste Code	Receiving Facility
___	___
___	___
___	___

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

Yes ___ No ___

b. Is a notification sent with each waste shipment?

Yes ___ No ___

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

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

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

Waste Code	Subsequent Handler
___	_____
___	_____
___	_____

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

Yes ___ No ___

5. Records Retention

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

Yes ✓ No ___

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

Yes ___ No ___ NA ✓

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

Yes ___ No ___ NA ✓

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

Comments _____

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

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

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

   List types of waste treatment units and processes:

Waste Code	Type of Treatment	Treatment Units and Processes
F001 F002 F003 F005	Reclamation	Distillation unit Wastewater treatment unit

2. Are treatment residuals generated from these units?

   Yes ✓ No ___

   Comments ___

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

   Yes ✓ No ___ NA ___

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

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

RCRA LAND DISPOSAL RESTRICTION INSPECTION

IV. TSD REQUIREMENTS

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

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

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

Comments ___

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

Yes ___ No ___ NA ✓

3. What date was the waste analysis plan last revised? 9/25/90

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

Yes ✓ No ___

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

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

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

Yes ✓ No ___ NA ___

If analyses are conducted off site, identify lab: ___

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

Yes ___ No ___ NA ✓

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

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

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

Yes ___ No ___ NA ✓

*See Appendix C for exceptions.

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

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

Yes ___ No ___ NA ✓

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

B. Operating Record [40 CFR 264.73 and 265.73]

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

Yes ✓ No ___

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

Yes ✓ No ___

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

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

Yes ✓ No ___ NA ___

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

Yes ___ No ___ NA ✓

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

C. Storage [40 CFR 268.50]

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

Yes ✓ No ___ (If No, go to 2.)

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

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

Yes ✓ No ___

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

Yes ___ No ✓ (If No, go to 2.)

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

Yes ___ No ___

If yes, state how:_____

2. Are prohibited wastes stored on site in tanks?

Yes ✓ No ___ (If No, go to 3.)

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

Yes ✓ No ___

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

Yes ✓ No ___ (If Yes, go to 3.)

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

Yes ___ No ___

If yes, state how:_____

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

Yes ___ No ✓ (If No, go to D.)

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

Yes ___ No ___

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

Yes ___ No ___

D. Treatment

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

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

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

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

Was an alternative method approved?

Yes___ No___

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

Waste Code	Required Technology	Alternative Method	Approval

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

Yes___ No___ NA ✓

4. Describe all other waste codes and treatment processes:

Waste Code	Treatment Processes
F001 F002	Distillation
F004 F005	Fractionation
D001	liquid-liquid extraction

5. Characteristic wastes:

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

Yes ✓ No ___

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

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

Yes ✓ No ___

Comments ___

6. Dilution Prohibition [40 CFR 268.3]:

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

Yes ___ No ✓ (If No, go to c.)

List the wastes ___

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

Yes ___ No ___

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

Yes ___ No ___

Comments ___

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

Yes ___ No ✓

Comments ___

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

Yes ✓ No ___

Comments _____

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

Yes ___ No ✓ (If No, go to 9.)

Complete the following table:

Waste Code	Receiving Facility
___	_____
___	_____
___	_____

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

Yes ___ No ___

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

Yes ___ No ✓ (If No, go to 10.)

Complete the following table:

Waste Code	Receiving Facility
___	_____
___	_____
___	_____

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

Yes ___ No ___

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

Yes ✓ No ___ (If No, go to E.)

Complete the following table:

Waste Code	Receiving Facility
F001,2,3,5	S-K Clarksville Mo + Hebron, OH
D001	SK Dolton - SK - Franklin Park, IL

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

Yes ✓ No ___

E. **Surface Impoundments [40 CFR 268.4]**

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

   Yes ___ No ✓ (If No, go to F.)

   List _____

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

   Yes ___ No ___

   Comments _____

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

   Yes ___ No ___

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

   Yes ___ No ___ NA ___

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

   Yes ___ No ___

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

   Yes ___ No ___

   Comments _____

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

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

Provide the frequency of analyses conducted on treatment residues:

_____

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

Yes ___ No ___ NA___

Comments _____

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

Yes ___ No ___

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

Yes ___ No ___ NA___

Comments_____

F. **Land Disposal**

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

Yes ___ No ✓ (If No, go to G.)

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

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

Unit	Waste

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

Yes ___ No ___

Comments_____

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

Yes ___ No ___ NA___

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

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

Yes ___ No ___

If yes, at what frequency are analyses performed?_____

_____

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

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

List waste codes in appropriate category below:

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

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

Yes ___ No ___ NA ___

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

Yes ___ No ___ NA ___

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

Yes ___ No ___ NA ___

6. Are restricted wastes placed in underground injection wells?

Yes ___ No ___ List _____

G. **Other Wastestreams**

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

   Yes ✓ No ___ (If No, go to H.)

2. On-Site Management

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

      Yes ___ No ___ NA ✓

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

      Yes ___ No ___ NA ✓

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

3. Off-Site Management: Waste Exceeds Treatment Standards

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

   Yes ✓ No ___ (If No, go to 4.)

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

Waste Code	Receiving Facility
F001, 2	S-K Hebron, OH
F003, 5	S-K Dalton, IL
D001	S-K Franklin Park, IL

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

   Yes ✓ No ___ (If No, go to 4.)

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

Yes ___ No ___ NA ✓

4. Off-Site Management: Wastes Meets Treatment Standards

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

Yes ___ No ✓ (If No, go to 5.)

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

Waste Code	Receiving Facility
_____	_____
_____	_____
_____	_____

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

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

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

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

Complete the following table:

Waste Code	Receiving Facility
_____	_____
_____	_____
_____	_____

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

Yes ___ No ___

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

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

Yes ___ No ✓ (If No, go to 6.)

Complete the following table:

Waste Code	Receiving Facility

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

Yes ___ No ___

6. Dilution Prohibition [40 CFR 268.3]:

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

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

Yes ___ No ✓ (If No, go to b.)

List the wastes _____

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

Yes ___ No ___

Comments _____

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

Yes ___ No ✓ (If No, go to c.)

Check appropriate category:

___Dilutes to meet treatment standards
___Dilutes to render waste non-hazardous

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

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

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

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

____
____
____

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

Yes ___ No ✓

Comments ______________________________

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

____
____
____
____
____
____
____
____
____
____
____
____
____
____
____
____
____
____
____
____
____
____
____
____

RECEIVED
SEP 0 3 199
PERMIT SECTION
EPA, REGION V

file

Illinois Environmental Protection Agency
Division of Land Pollution Control

RCRA INSPECTION REPORT

EPA #: IL D005450697 | IEPA #: 0316000053

Facility Name: SAFETY KLEEN CORP CHICAGO RC | Phone #: 312/247-2828

Street Address: 1445 West 42nd Street | County: Cook

City: CHICAGO | State: ILLINOIS | Zip: 60609

Region: MAYWOOD | Inspection Date: 1/26/93 | From: 9:00AM To: 12:15PM

Weather:

RECEIVED
WMD RCRA
RECORD CENTER
FEB 30 1993

TYPE OF FACILITY

Notified As: G/TRANS/TS, WAF, OSF | Regulated As: G/S, WAF

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

TYPE OF INSPECTION

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

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

NON-REGULATED STATUS N/A

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

PART A

Notification Date: 8/5/80, from (initial) or (subsequent) Notification.

Initial Part A Date: 11/19/80 | Amended: 9/24/90

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

PART B PERMIT APPLICATION

Part B Permit Submitted: (Y) or N 11/9/88 | Final Permit Issued: 9/30/92

ENFORCEMENT N/A

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

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

ORDERS ISSUED N/A

CACO: ___/___/___ CAFO: ___/___/___ Consent Decree: ___/___/___

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

TSD FACILITY ACTIVITY SUMMARY

Activity by Process Code	On Part A?	Activity Conducted Prior to 1980?	Was Activity Ever Done?	Closed	Being done at Time of Insp.?	Exempt per 35 IAC, Sec.	On Annual Report 1991	1990	1989
S01	YES	YES	YES	NO	YES	N/A	YES	YES	YES
S02	YES	YES	YES	NO	YES	N/A	YES	YES	YES
R03	N/A	YES	YES	N/A	YES	725.101(c)(b)	NO	NO	NO

RECEIVED
- 9 FEB 1993
IEPA/DLPC

IL 532-1834

OWNER	OPERATOR
Name SAFETY-KLEEN CORP	Name SAFETY-KLEEN CORP. CHICAGO
Address 777 Big Timber Road	Address 1445 West 42nd St. R
City Elgin	City Chicago
State IL Zip 60173	State IL Zip 60609
Phone # 708/697-8460	Phone # 312/247-2828

PERSON(S) INTERVIEWED	TITLE	PHONE #
Alfred Aghapour	FACILITY MANAGER	312/247-2828
Desi Chari	Regional Envior. Engineer	708/468-2579

INSPECTION PARTICIPANT(S)	AGENCY/TITLE	PHONE #
Anna Van Orden	IEPA / EPS	708/531-5900

PREPARED BY	AGENCY/TITLE	PHONE #
Anna Van Orden	IEPA / EPS	708/531-5900

SUMMARY OF APPARENT VIOLATIONS

Area	Class	Section

Area	Class	Section

Area	Class	Section

Facility N : SAFETY-KLEEN CORP. CHICAGO RC

USEPA #: D 0 0 5 4 5 8 6 9 7

IEPA #: 0 3 1 6 0 0 0 0 5 3

WASTE DISPOSITION FORM

Waste Name (include haz & waste for which no determination has been made)	Generating Process (For waste gen. on site. N/A for TSD)	Date of Last Analysis	USEPA Haz Waste #	* On 8700-12	* On 3510-3	On Annual Report for: (Circle if present; cross out if not present) * 19 91	* 19 90	* 19 89	Amount on Site	Rate of Generation	Last Manifested Shipment	Disposition
STILL BOTTOMS	Residual Material From the Distillation Process	Every shipment	F001 F002 F003 F005	YES	YES	G ~~F~~	G ~~F~~	G ~~F~~	14,345 gal	25-50,000 gal/mo.	1/21/93	SAFETY-KLEEN IN CLARKSVILLE, MISSOURI for blending/reclamation
MISC. DRUMMED WASTE	-Cleaning out tanks -Used Oil Dry -hose dripping -Cut Metal Drums		F001 F002	YES	YES	G ~~F~~	G ~~F~~	G ~~F~~	43 Drums	30-45 Drums	10/29/92	SAFETY-KLEEN IN HEBRON, OH FOR BLENDING/RECLAMATION OR TREATMENT
WASTE FILTERS	Used to Filter Waste + Product as material enters tanks		F001 F002 F003 F005	YES	YES	G ~~F~~	G ~~F~~	G ~~F~~	↓	↓	↓	↓
REMANIFESTED WASTE	-WASTE SENT INTERIM -Temp. storage -shipped for further reclamation		F001 F002 D001	YES	YES	G ~~F~~	G ~~F~~	G ~~F~~	Ø	5,000 gal/mo.	4/20/92	SAFETY-KLEEN IN DOLTON, IL for BLENDING/RECLAMATION
SPENT SOLVENT	From two parts washers + one immersion Cleaner	↓	F005 D001	YES	YES	G ~~F~~	G ~~F~~	G ~~F~~	Ø	30 gal. month	12/28/92	SAFETY-KLEEN IN FRANKLIN PARK, IL for Storage (Temp.)
						G F	G F	G F				
						G F	G F	G F				
						G F	G F	G F				
						G F	G F	G F				
						G F	G F	G F				

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

IL 532-1836
LPC

NARRATIVE

Safety Kleen , the Chicago Recycle Center, is an organic chemicals reclamation and recycling facility (involving either regeneration of the spent solvent or blending/processing for use as a hazardous waste fuel) that accepts organic chemicals and solvent wastes from industrial and commercial facilities. Industries served include chemical manufacturers, pharmaceutical manufacturers, paint manufacturers, electronics manufacturers, foundries, metal fabrication shops and maintenance shops.

Used solvents, solvent mixtures and other solvent containing wastes are recovered by a bombination of proceses including neutralization, distillation, fractionation, liquid-liquid extraction and drying.

Chicago Recycle Center handles primarily two accounts:

1) the toll business - The toll customer (generally industrial accounts) ships waste or off specification material to the Chicago Recycle Center for treatment. The facility recycles the material to the customer's specifications and returns the material to the original generator.

2) the recycling business - The recycling business consists of industrial solvents which come to the Chicago Recycle Center from Safety Kleen sales network. These waste materials are recycled at the facility to Safety Kleen corporate specifications and the processed material is sold as product on the market.

Hazardous Waste Units

SO1 - Container Storage Area #1
- used for storage of hazardous and non-hazardous wastes which are generated on site and off site.
- concrete pad with concrete curbs.
- 2 foot wide trench runs along the east side of the area and into a cistern.

SO2 - Tank Farms #1, #2, #3, #4, #5
- all are constructed of reinforced concrete with concrete perimeteer dikes.
- Tank Farms #1, #2, #3, #4, and #5 have been provided with an impermeable coating as an addition to the existing secondary containment.

Hazardous Wastes

Still Bottoms - F001, F002, F003, F005
- Residual material from the distillation process
- Rate of generation: 25,000 - 50,000 gallons/month
- Shipped to Safety Kleen in Clarksville, Missouri for fuel blending or reclamation.
- Amount on site: 14,345 gallons

Miscellaneus Drummed Waste and Waste Filters - F001, F002, F003, F005
- Waste generated by various methods:
  - Cleaning out of tanks
  - Used oil dry
  - Hose drippings
  - Cut drums in order to remove solid material inside
  - Used to filter waste as it is pumped into tanks
- Rate of generation: 30 - 45 drums
- Shipped to Safety Kleen in Hebron, OH for fuel blending / reclamation or further treatment.
- Amount on site: 43 drums

Remanifated Waste - F001, F002, D001
- Waste generated not intended for reclamation on site but is stored temporarily until it is sent off site for reclamation. Also, waste shipped to facility in error.
- Rate of generation: 5,000 gallons/month
- Shipped to Safety Kleen in Dolton, IL for fuel blending or further reclamation.
- Amount on site: 0

Spent Solvent - F005, D001
- Waste generated from two parts washers and one immersion cleaner unit
- Rate of generation: 30 Gallons/month
- Shipped to Safety Kleen in Franklin Park, IL for storage prior to off site reclamation.
- Amount on site: 0

PART B PERMIT CONDITIONS

As Generator

- Waste Analyses	- in compliance
- Manifests	- in compliance
- Personnel Records	- in compliance
- Contingency Plan	- in compliance
- Annual Reports	- in compliance
- Certificatied Written Assesment for Tank System	- in compliance

As TSD

- Waste Analyses for Stored Waste	- in compliance
- Waste Analyses Plan	- in compliance
- Written Inspection Plan	- in compliance
- Inspection Records	- in compliance
- Personnel Training Program and Records	- in compliance
- Contingency Plan	- in compliance
- Operating Record	- in compliance
- Annual Reports	- in compliance
- Closure Plan w/Closure Cost Estimates	- in compliance
- Financial Assurance	- in compliance

Observations

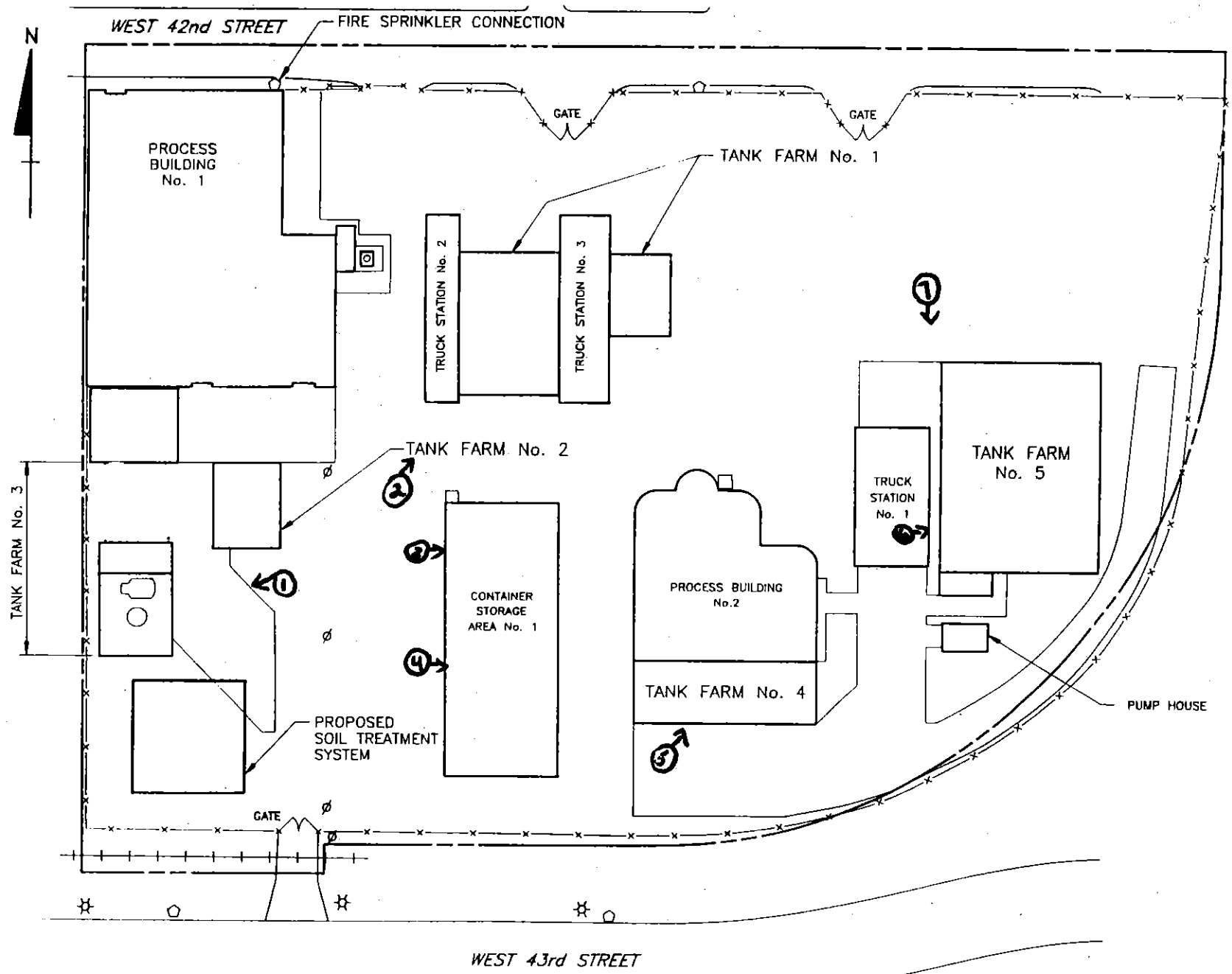
As specified in Part B Permit ,facility has installed a high level alarm system for detection of leaks.

There were four small spill incidents that were reported to IEPA in Springfield.

Incident # 930223	Date 1/22/93	Amount 2 gallons.
Incident # 930057	Date 1/5/93	Amount 32 ounces.
Incident # 923587	Date 12/17/92	Amount 2 gallons.
Incident # 923550	Date 12/14/92	Amount 5 gallons.

At the time of this inspection, this facility was operating as a generator, a storage facility, and a marketer of hazardous waste fuel. The facility appeared to be operating in compliance with all applicable RCRA regulations and their Part B Permit requirements.

DRAWING NUMBER 90-280-B11



No.	DATE	ISSUE / REVISION	DWN. BY	CK'D BY	APP'D BY
1	11-7-91	ISSUED TO CLIENT AND AGENCY	SAK		PWL

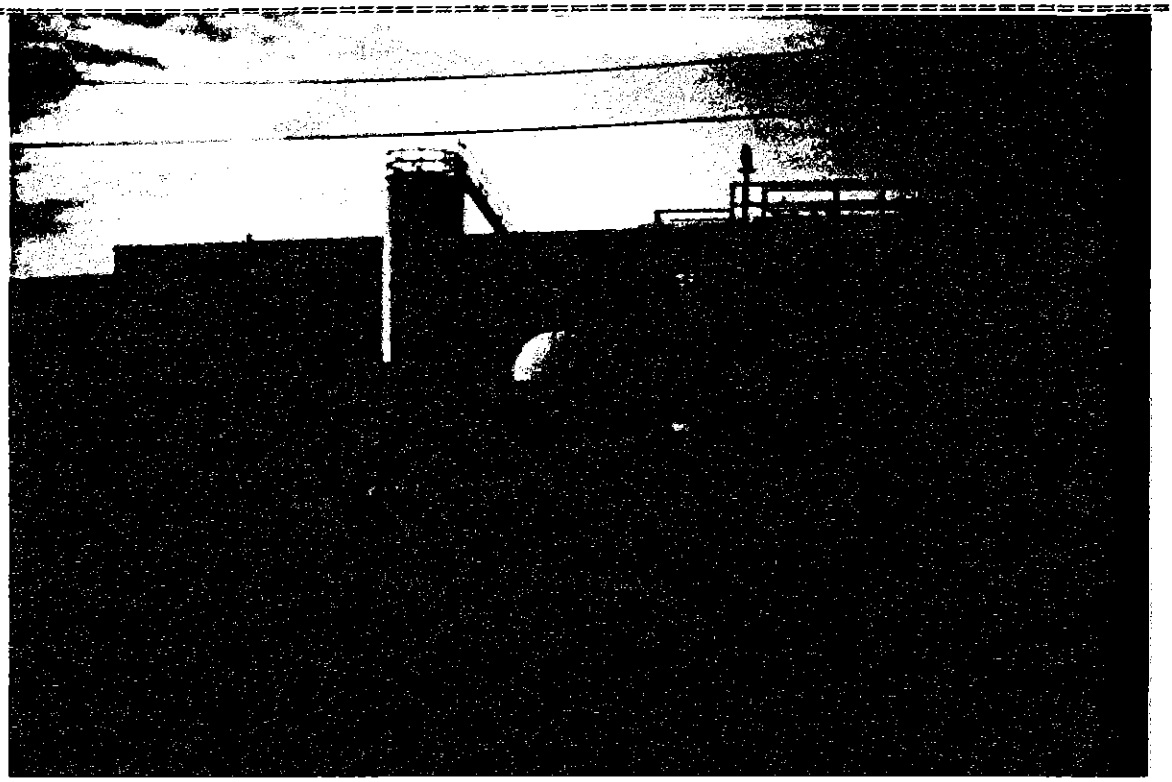
REFERENCES:
- SAFETY KLEEN CORP., ELGIN ILLINOIS, DRAWING 88-62000-00, DATED 1987 REVISION 0.

SAFETY-KLEEN CORP. CHICAGO RC
0316000053
1-26-93

Illinois Environmental Protection Agency Photographs

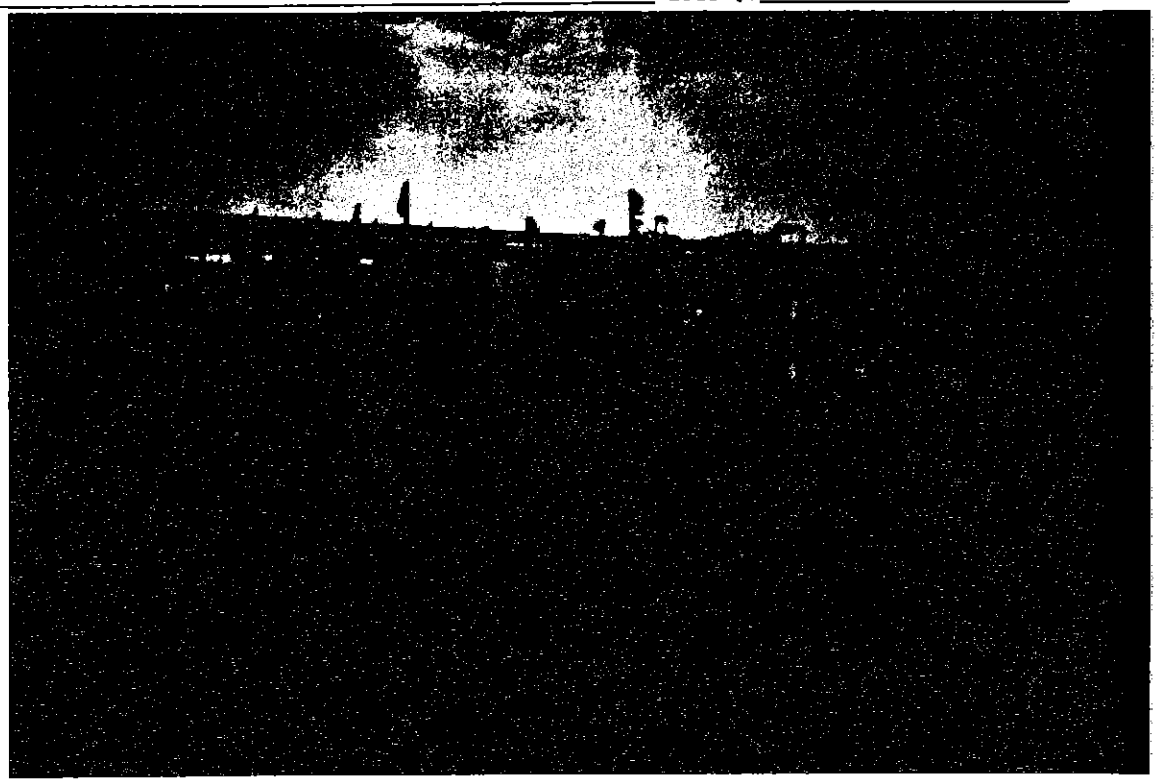
Site Name: SAFETY-KLEEN CORP. CHICAGO RC IEPA #: 0316000053

Date: January 26, 1993 Time: 9:00AM - 12:15PM Photograph By: Anna VAnOrden (AVO)



Comments: FACING SOUTHWEST - TANK FARM #3

Roll #: 93- 215 Photo #: 1



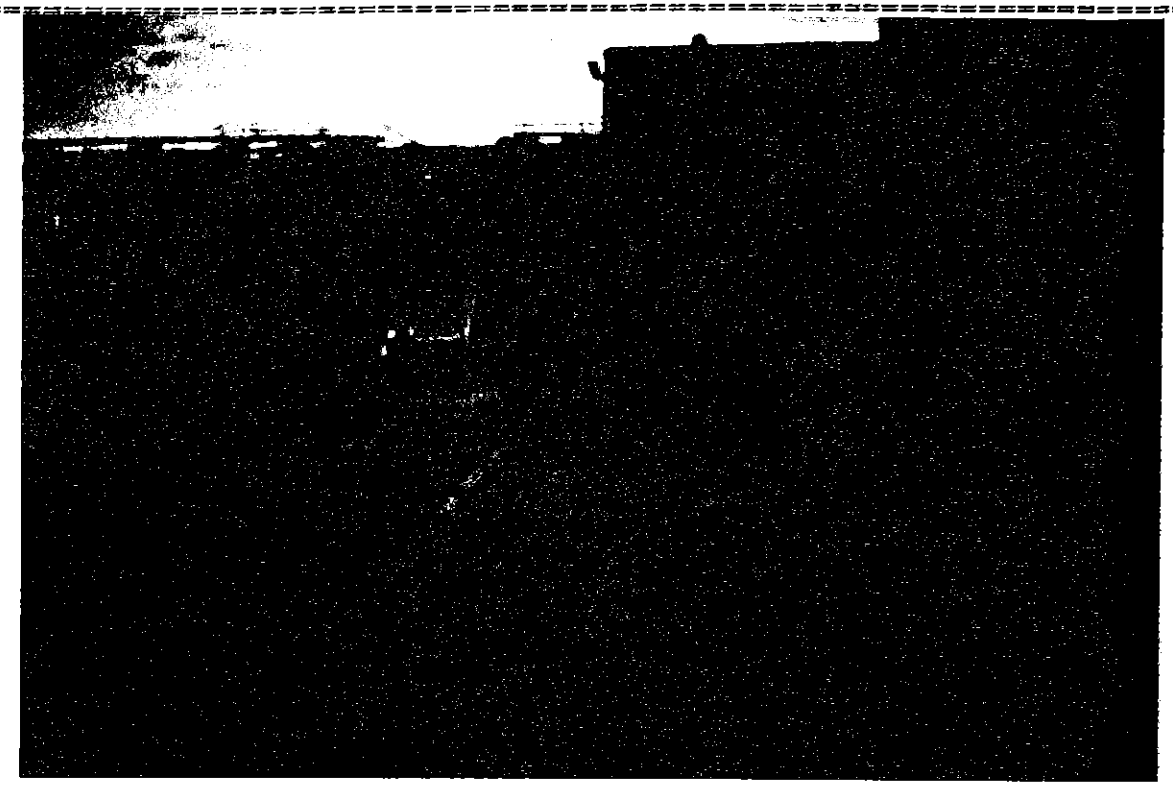
Comments: FACING NORTHEAST - TANK FARM #1

Roll #: 93- 215 Photo #: 2

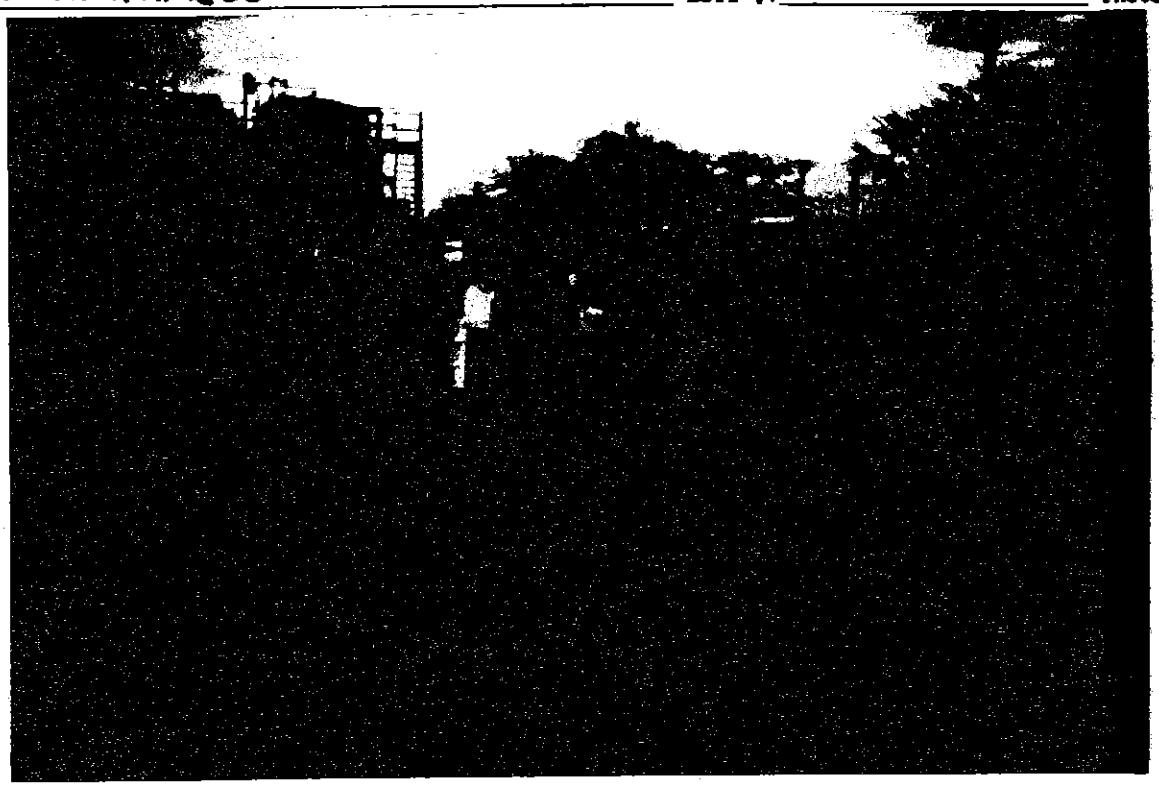
Illinois Environmental Protection Agency Photographs

Site Name: SAFETY-KLEEN CORP. CHICAGO RC IEPA #: 0316000053

Date: January 26, 1993 Time: 9:00AM - 12:15PM Photograph By: Anna VAnOrden



Comments: FACING EAST - CONTAINER STORAGE AREA #1
FLAMMABLE DRUMS Roll #: 93- 215 Photo #: 3

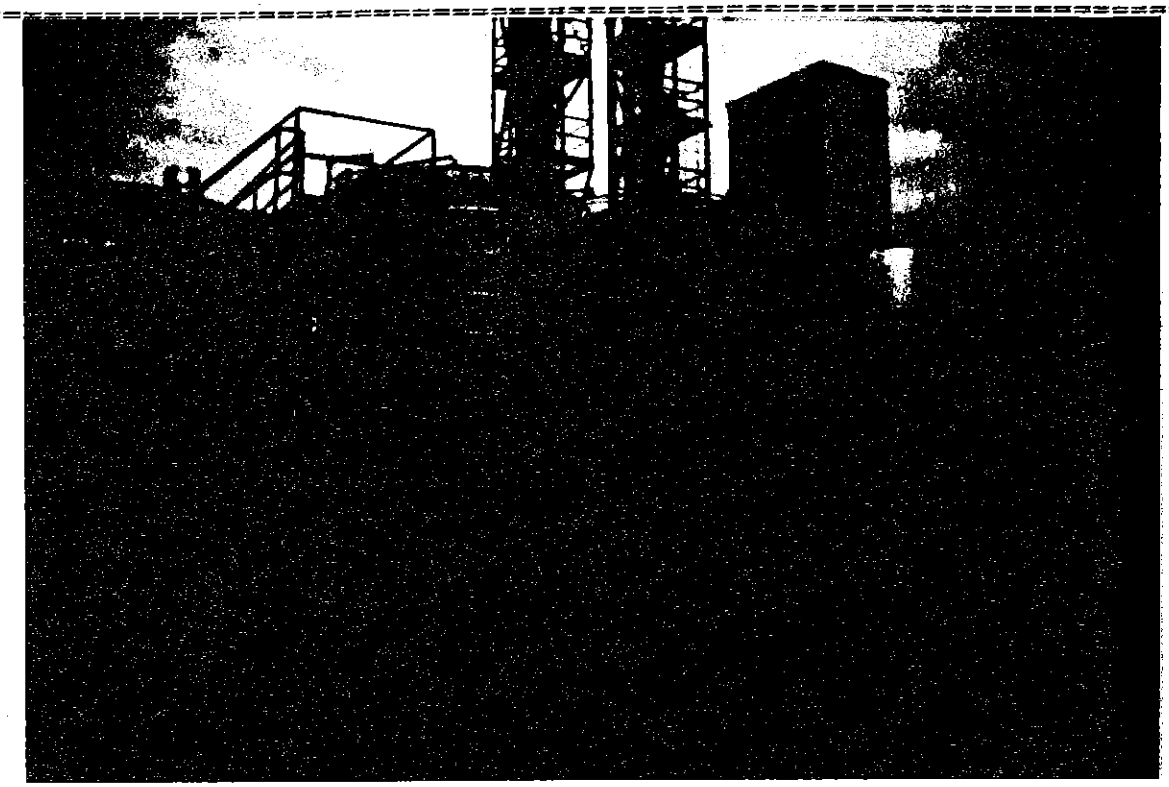


Comments: FACING EAST - CONTAINER STORAGE AREA #1
HAZARDOUS WASTE DRUMS Roll #: 93- 215 Photo #: 4

Illinois Environmental Protection Agency Photographs

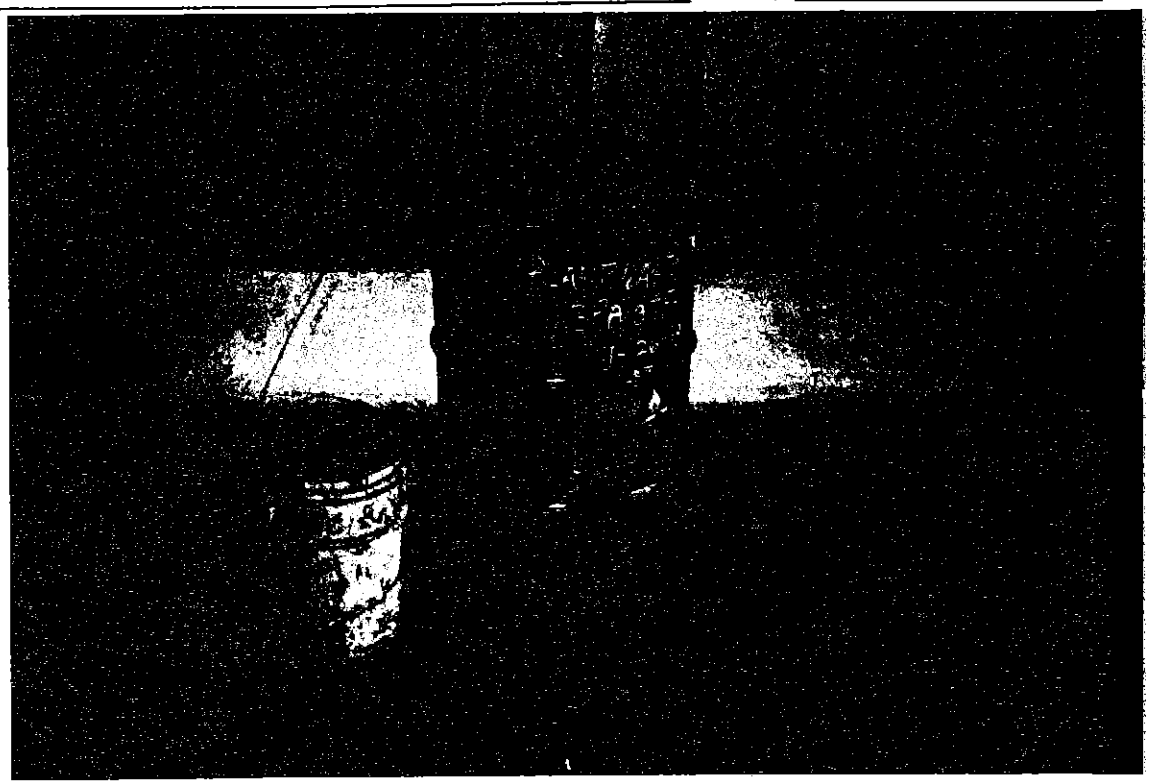
Site Name: SAFETY-KLEEN CORP. CHICAGO RC IEPA #: 0316000053

Date: January 26, 1993 Time: 9:00AM - 12:15PM Photograph By: Anna VAnOrden



Comments: FACING NORTH EAST - TANK FARM # 4

Roll #: 93- 215 Photo #: 5



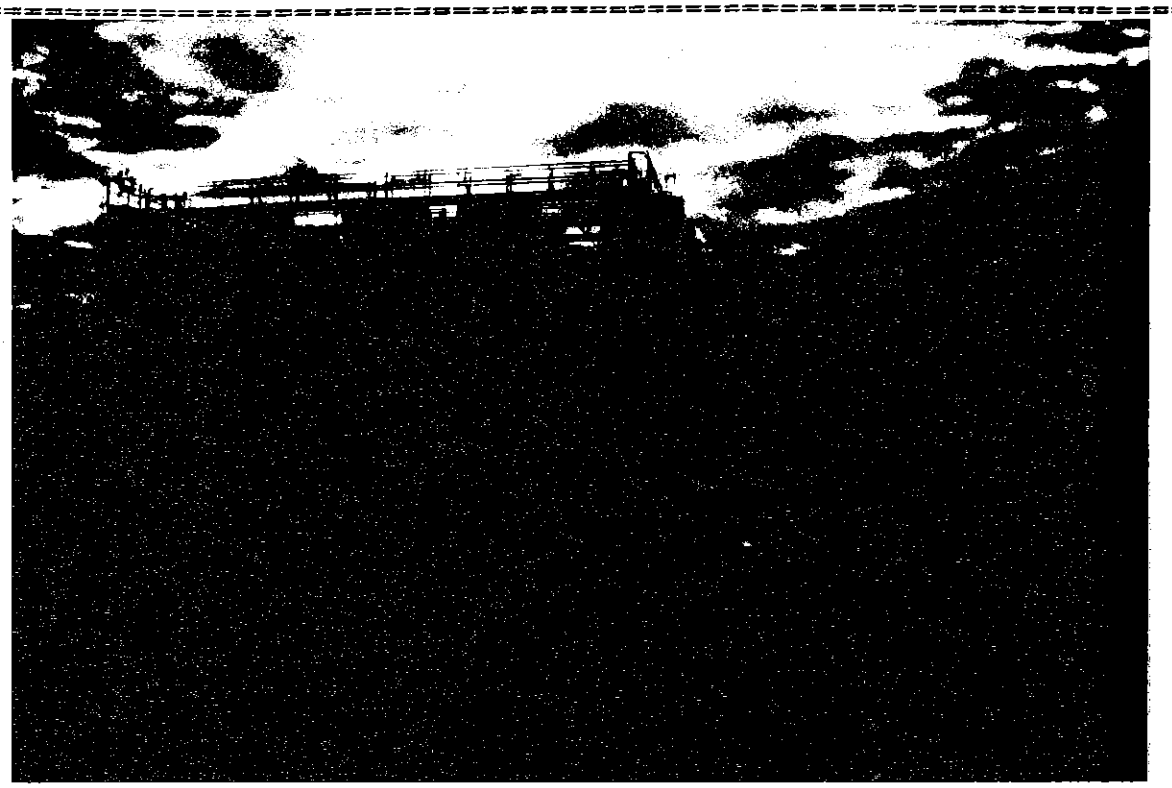
Comments: FACING EAST - SATELLITE ACCUMULATION INSIDE TRUCK STATION #1

Roll #: 93- 215 Photo #: 6

Illinois Environmental Protection Agency Photographs

Site Name: SAFETY-KLEEN CORP. CHICAGO RC IEPA #: 0316000053

Date: January 26, 1993 Time: 9:00AM - 12:15PM Photograph By: Anna VAnOrden



Comments: FACING SOUTH - TANK FARM #5 AND TRUCK STATION #1

Roll #: 93- 215 Photo #: 7

Comments:

Roll #: 93- 215 Photo #:

Area	Class	90 Day F U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No
				PART 722 **GENERATOR STANDARDS** **Subpart A: General**				
OTH	1			**Section 722.111: Hazardous Waste Determination**	✓			
				Has the generator determined if the solid waste it generates is a hazardous waste? Yes ✓ No ___				
				Did the generator follow the procedures specified in this section in making its determination? Yes ✓ No ___				
OTH	1			**Section 722.112: USEPA Identification Number**	✓			
			a	Has the generator obtained a USEPA identification number? Yes ✓ No ___				
			c	Has the generator offered his hazardous waste only to transporters or to treatment, storage or disposal facilities that have received a USEPA identification number? Yes ✓ No ___				

RECEIVED
- 9 FEB 1993
IEPA/DLPC

Area	Class	90 Day F U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No
				PART 722 **GENERATOR STANDARDS** **Subpart B: The Manifest**				
MAN	2			**Section 722.120: General Requirements**	✓			
			a	Has the generator who transports, or who offers its hazardous waste for transportation off-site for treatment, storage or disposal prepared a uniform hazardous waste manifest? Yes ✓ No ___ **Note: If the generator has not used a manifest, check "No" in the Apparent Compliance Column and skip to 722.130.**				
			b	Did the generator designate on the manifest one facility which is permitted to handle the hazardous waste therein described? Yes ✓ No ___ **Note: The generator may also designate an alternate facility permitted to handle the hazardous waste in the event an emergency prevents delivery of the hazardous waste to the primary designated facility.**				
			d	In any instances where the transporter was unable to deliver the hazardous waste to the designated or alternate permitted facility, has the generator designated another permitted facility or instructed the transporter to return the waste? Yes ✓ No ___				

Area	Class	90 Day F U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No
MAN	2			**Section 722.121: Acquisition of Manifests**	✔			
			a	Did the generator use the manifest supplied by the Agency for hazardous waste going for treatment, storage or disposal in Illinois? Yes ✔ No ___ N/A ___				
			b	For hazardous waste going outside Illinois for treatment, storage or disposal, has the generator used the manifest supplied by the Agency if the State to which the hazardous waste is being shipped does not supply and require the completion of its own State manifest? **or** For hazardous waste going outside Illinois for treatment, storage or disposal, has the generator used the manifest required by the State to which the hazardous waste is being shipped? Yes ✔ No ___ N/A ___				
MAN	2			**Section 722.122: Number of Copies** Does the manifest the generator is using consist of at least six copies (plus one copy for each additional transporter)?	✔			
MAN	2			**Section 722.123: Use of the Manifest** For each manifest received, has the generator: 1) Signed the certificate by hand? Yes ✔ No ___ 2) Obtained the handwritten signature and the date of acceptance by the initial transporter? Yes ✔ No ___	✔			

IL 532-1592
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
				3) Retained one copy as required by Section 722.140(a), Recordkeeping? Yes ✓ No ___				
				4) Apparently sent a copy (Part 5 for Illinois manifests) to the Agency within two working days? Yes ✓ No ___				
				NOTE: Obtain a copy of any manifest which is not in compliance with the requirements of this subsection. If copies are unobtainable, log manifest #s.				
			b	Has the generator apparently given the remaining copies of the manifest to the transporter? Yes ✓ No ___				
			c	Has the generator followed the procedures prescribed in Section 722.123(c) for manifesting bulk shipments of hazardous waste by water? Yes ___ No ___ N/A ✓				No shipments by water or rail.
			d	Has the generator followed the procedures prescribed in Section 722.123(d) for manifesting bulk shipments of hazardous waste by rail? Yes ___ No ___ N/A ✓				

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No
				PART 722 **GENERATOR STANDARDS** **Subpart C: Pre-Transport Requirements**				No waste ready for transportation off-site.
OTH	1	X		**Section 722.130: Packaging** Is waste which is ready for transportation off-site packaged in accordance with 49 CFR, Parts 173, 178 and 179?			✓	
OTH	1	X		**Section 722.131: Labeling** Is each package of hazardous waste which is ready for transportation off-site labeled in accordance with 49 CFR Part 172?			✓	
OTH	1	X		**Section 722.132: Marking**			✓	
			a	Is each package of hazardous waste which is ready for transportation off-site marked in accordance with 49 CFR Part 172? Yes ____ No ____				
			b	Is each package of hazardous waste which is ready for transportation off-site marked with: - The generator's name and address? Yes ___ No ___ - The manifest document number associated with the container? Yes ___ No ___ - The words "Hazardous Waste - Federal Law Prohibits Improper Disposal. If found contact the nearest police, or public safety authority or the U.S. Environmental Protection Agency"? Yes ____ No ____				

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No
OTH	1			**Section 722.133: Placarding** Does the generator have, for the waste it generates, the proper placards to: - Placard the transport vehicle, or - Offer to the first transporter, according to 49 CFR, Part 172, Subpart F? **NOTE: If the placards are provided by the transporter, then mark the N/A Column and use Comment field to explain.**			✓	Transporter supplies placards.
OTH	1	X		**Section 722.134: Accumulation Time** **NOTE: If the TSD checklist will be completed and the facility only accumulates wastes for 90 days or less for Section 722.134 complete page GEN-C-2(a) then skip to TSD checklist.** **NOTE: A generator who is also a TSD would be subject to this section for any waste which is not identified for storage on the facility's Part A, or which is being accumulated outside a "permitted" storage area.**			✓	FACILITY HAS PART B PERMIT FOR STORAGE OF HAZARDOUS WASTE.
			a	For waste in containers, has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subpart I: Use and Management of Containers listed below: **NOTE: If no wastes in containers, mark "N/A" and skip to Section 725.291 of the Generator checklist.**				

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No
OTH	1	X		**Section 722.134: Accumulation Time**			✓	
				NOTE: A generator who is also a TSD would be subject to this section for any waste which is not identified for storage on the facility's Part A, or which is being accumulated outside a "permitted" storage area.				
			a1	For waste in containers, has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subpart I?				
				and/or				
				For waste in tanks, has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subpart J except Section 725.297(c) and 725.300? Yes ____ No ____				
			a2	For waste in containers, has the generator marked and made visible for inspection on each container, the date upon which accumulation began? Yes ____ No ____ N/A ____				
			a3	For waste in containers and tanks, has the generator marked or labeled each with the words "Hazardous Waste"? Yes ____ No ____				
			a4	Has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subparts C and D, and Section 725.116? Yes ____ No ____				

IL 532-1502
(Rev 756 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
				SATELLITE ACCUMULATION				
			c1	Is the generator who accumulates hazardous waste in containers at or near any point of generation where wastes initially accumulate and which is under the control of the operator of the process generating the waste: - Limiting such accumulation to 55 gallons (one quart of acutely hazardous waste listed in 35 Ill. Adm. Code 721.133)? Yes ✓ No ____ N/A ____ - Complying with the requirements of: 1) 35 Ill. Adm. Code 725.271, Condition of Containers? Yes ✓ No ____ 2) 35 Ill. Adm. Code 725.272, Compatibility of Waste with Containers? Yes ✓ No ____ 3) 35 Ill. Adm. Code 725.273(a), Management of Containers - requiring that the containers be stored closed except when waste is being added or removed? Yes ✓ No ____ - Marking the containers with the words "Hazardous Waste" or with words that identify the contents of the containers? Yes ✓ No ____				

IL 532-1592
LPC 266 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
			c2	Has the generator who accumulates more than 55 gallons (one quart of acutely hazardous waste listed in 35 Ill. Adm. Code 721.133(e)) with respect to the amount of excess waste, complied with the requirements in Section 722.134(a) within three days? Yes ____ No ____ Are the containers with the excess amounts marked with the date accumulation began? Yes ____ No ____ During the three day period, is the generator continuing to comply with the requirements of Section 722.134(c)(1)? Yes ____ No ____				No excess accumulation

IL 532-1392
LPC 216 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 722 **GENERATOR STANDARDS** **Subpart D: Recordkeeping and Reporting**				
OTH	2			**Section 722.140: Recordkeeping**	✓			
				Has the generator retained for a period of three years:				
			a	- A copy of each signed manifest? Yes ✓ No ___				
			b	- A copy of each annual report? Yes ✓ No ___				
			b	- A copy of each exception report? Yes ___ No ___ N/A ✓				
			c	- Copies of test results, waste analyses or other determinations made in accordance with Section 722.111? Yes ✓ No ___ N/A ___				
			d	Does a generator who is involved in any unresolved enforcement action continue to maintain the records required in 722.140(a) thru (c)? Yes ___ No ___ N/A ✓				
			d	If the Director has requested that the records required in 722.140(a) thru (c) be maintained for a period longer than three years, has the generator continued to maintain them? Yes ___ No ___ N/A ✓				

IL 532-1502
LPC 258 8/87

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No
OTH	2			**Section 722.141: Annual Reporting**	✓			
				Has the generator who ships waste off-site to a treatment, storage or disposal facility within the United States prepared and submittted a copy of an annual report, as supplied by the Agency, to the Agency by March 1 for the preceeding calendar year?				
				NOTE: A generator who treats, stores or disposes of hazardous waste on-site must also submit an annual report as a TSD in accordance with the requirements of 35 Ill. Adm. Code 702, 703, 724, 725 and 40 CFR 266.				
MAN	1			**Section 722.142: Exception Reporting**			✓	No exception reports
			a	Has the generator who has not received a signed copy of the manifest from the designated TSD within 35 days of the date the waste was accepted by the initial transporter determined the status of its hazardous waste? Yes ____ No ____				
			b	Has the generator who has not received a signed copy of the manifest from the designated TSD within 45 days of the date the waste was accepted by the original transporter submitted an exception report to the Director? Yes ____ No ____				
			b	Does any exception report submitted to the Director contain the following:				
				- A legible copy of the manifest for which the generator does not have confirmation of delivery; and				

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
				- A cover letter signed by the generator or his authorized representative explaining the efforts taken to locate the hazardous waste and the results of those efforts? Yes ____ No ____ N/A ____				
OTH	1			**Section 722.143: Additional Reporting** Has the generator submitted all additional reports concerning quantities and disposition of wastes as required by the Director?			✓	None required

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
OTH	1/2			**PART 722** **GENERATOR STANDARDS** **Subpart E: Exports of Hazardous Waste** **Section 722.152: General Requirements** Has the facility made any shipments of hazardous waste outside the United States? Yes ____ No ✓ **NOTE: If "No", skip Subpart E. If "Yes", answer the next question.** Has the generator complied with the requirements in Sections 722.152 through 722.157? Yes ____ No ____ **NOTE: If the answer is "No", explain in detail why the firm did not meet the requirements. Review the requirements prior to answering this question. When citing a violation of this Subpart, identify the specific section violated in the Narrative as well as in the Comments.**			✓	No exports of H.W.

IL 532-1592
LPC 266 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 722 **GENERATOR STANDARDS** **Subpart F: Imports of Hazardous Waste**				
MAN	1			**Section 722.160: Imports of Hazardous Waste**			✓	No Imports of H.W.
			b1	Has the person importing hazardous waste met the manifest requirements of Section 722.120 except that: In place of the generator's name, address and USEPA identification number, the name and address of the foreign generator and the importer's name, address and USEPA identification number are used; **and**				
			b2	Has the importer or his agent signed the manifest in place of the generator; **and**				
			b2	Has the importer or his agent obtained the signature of the initial transporter? Yes ____ No ____ N/A ____				
			c	Is the person importing hazardous waste using manifests obtained from the Agency? Yes ____ No ____				

IL 532-1582
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	X		**PART 722** **GENERATOR STANDARDS** **Subpart G: Farmers** **Section 722.170: Farmers** Is a farmer who is disposing of waste pesticides from his own use which are hazardous wastes: - Triple rinsing each emptied pesticide container in accordance with 35 Ill. Adm. Code 727.107(b)(3), Residues of Hazardous Waste in Empty Containers? Yes ___ No ___ N/A ___ - Disposing of pesticide residue on his own farm in a manner consistent with the disposal instructions on the pesticide label? Yes ___ No ___ N/A ___ **NOTE: If the answer to either of the preceeding questions is "No", the farmer is subject to the requirements of this Part (722) and to the applicable portions of 35 Ill. Adm. Code 702, 703 and 725 (724). Complete the applicable inspection form(s).**			✓	No farming activity

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 726 **STANDARDS FOR THE MANAGEMENT OF SPECIFIC HAZARDOUS WASTE AND SPECIAL TYPES OF HAZARDOUS WASTE MANAGEMENT FACILITIES** **Subpart D: Hazardous Waste Burned for Energy Recovery** **<u>NOTE</u>: Facilities that burn hazardous waste for energy recovery (excluding Subpart O incinerators) are subject to this subpart. However, used oil which has a hazardous characteristic is not regulated under Subpart D, but rather Subpart E. Materials identified in 721.104 and 721.106(a)(3)(E) through (I), and hazardous waste subject to 721.105 (SQG) are exempt from this subpart.**				
OTH		X		**Section 726.132: Standards Applicable to Generators of Hazardous Waste Fuel**	✓			
	I		a	Is the generator in compliance with 722 requirements (complete and attach the GEN or RR GEN checklist)? Yes ✓ No ___ N/A ___				
OTH				**Section 726.133: Standards Applicable to Transporters of Hazardous Waste Fuel**			✓	NOT A TRANSPORTER
	I			Is the transporter in compliance with 723 requirements (complete and attach the TR checklist)? Yes ___ No ___ N/A ✓				
OTH		X		**Section 726.134: Standards Applicable to Marketers of Hazardous Waste Fuel**	✓			
OTH	II		a	Is the marketer marketing hazardous waste fuel only to persons who have notified USEPA of their hazardous waste fuel activities and have obtained a USEPA identification number? Yes ✓ No ___ N/A ___				
				and				

IL 532-1582

Area	Class	90 Day F U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No
				If the fuel is burned, only to persons who burn the fuel in boilers or industrial furnaces identified in 726.131(b)? Yes ✓ No ___ N/A ___				Cement Kilns
	II		b	Has the marketer notified USEPA of its hazardous waste fuel activities (even if the marketer has previously notified USEPA of its other hazardous waste activities and has obtained a USEPA identification number)? Yes ✓ No ___ N/A ___				
	I		c	Is the marketer in compliance with 702, 703, 722.134, 724 Subparts A through L, and 725 Subparts A through L (complete and attach the necessary checklist(s) PER, TSD, etc.)? Yes ✓ No ___ N/A ___				FACILITY OPERATING UNDER PART B.
	I		d	For off-site shipments, is the marketer in compliance with 722 (complete and attach the GEN checklist)? Yes ✓ No ___ N/A ___				
	II		e	Required Notices. Has the marketer obtained a notice from the receiver of the hazardous waste fuel (a burner or subsequent marketer) that they have: notified USEPA (3010 RCRA), re-notified USEPA of waste-as-fuel activity, and if the waste fuel is to be burned, that it is burned only in an industrial furnace or boiler per 726.131(b). Yes ✓ No ___ N/A ___				
	II		e	Before accepting hazardous waste fuel, has the receiver (buyer) provided notices to the seller as outlined in the previous question? Yes ✓ No ___ N/A ___				
	II		f	Has the marketer kept a copy of each certification, sent or received, for three years? Yes ✓ No ___ N/A ___				

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				**Section 726.135: Standards Applicable to Burners of Hazardous Waste Fuel**			✓	
	I		a	Is the owner of an industrial furnace or boiler complying with the prohibitions in Section 726.131(b)? Yes ___ No ___ N/A ___				FACILITY DOES NOT BURN H.W. FUEL
	II		b	Has the USEPA been re-notified as to the burner's hazardous waste fuel activities? Yes ___ No ___ N/A ___				
	I		c	Does the burner accumulate/store hazardous waste fuel for a time period exceeding 90 days? Yes ___ No ___				
				NOTE: If "Yes", then the facility is subject to 702, 703, and 725 A through L (or 724 A through L for new facilities) and the appropriate checklist(s) must be completed. If "No", the facility must comply with 722.134 Accumulation Time.				
	I		c	Is the facility in compliance with 722.134? Yes ___ No ___ N/A ___				
	II		d	Prior to receiving the first shipment of hazardous waste fuel from a marketer, has the owner or operator of the industrial furnace or boiler provided the certification required in Sec. 726.135(d)? Yes ___ No ___ N/A ___				
	II		e	Has the burner kept a copy, for three years, of each certification notice that was sent to the marketers? Yes ___ No ___ N/A ___				

IL 532-1592
LPC 258 8/87

GEN/TSD/TRANS

RCRA LAND DISPOSAL RESTRICTIONS INSPECTION

I. General Information

Facility: SAFETY-KLEEN CORP. CHICAGO RC.

U.S. EPA ID No.: ILD 005450669 0316000053

Street: 1445 WEST 42nd Street

City: Chicago State: IL Zip: 60609

Telephone: 312/247-2829

Inspection Date: 1/26/93 Time: 9:00-12:15 (am/pm)

Weather Conditions: 20°

	Name	Agency/Title	Telephone
Inspectors:	Anne VanDrden	IEPA/EPS	708/531-5900
Facility Representatives:	Alfred Ashapour	Facility mgr.	312/247-2828
	Desi Cheri	Regional Enviar. Eng.	708/468-2579

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

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

* See Appendix A

RECEIVED
- 9 FEB 1993
IEPA/DLPC

INSPECTION SUMMARY

Processes That Generate LDR Wastes:

Distillation Unit
Fractionation Units
Liquid-Liquid Extraction Units
Waste Water Treatment Units
Filtering

Treatment Residuals are put back into the solvent recovery process if possible. Eventually these residuals are sent off-site for treatment or incineration.

LDR Waste Management:

Waste streams generated on-site & off-site are stored in containers or tanks.

All wastes generated on site are shipped off-site for treatment or incineration.

Summary:

No violations of the land disposal restrictions regulation were observed at the time of the inspection.

Signature: Anna VanOrden

RCRA LAND DISPOSAL RESTRICTIONS INSPECTION

II. WASTE IDENTIFICATION

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

1. F001 through F005 spent solvents:
   F001, F002, F003, F005

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

3. California List Wastes (See Appendix A):
   SPENT SOLVENTS

4. First Third Wastes [40 CFR 268.10]:

5. Second Third Wastes [40 CFR 268.11]:

6. Third Third Wastes [40 CFR 268.12]**:
   D001

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

B. Waste Code Determination

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

   Yes ✓ No___

   If no, list below:

Assigned Classification	Correct Classification

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

Comments:

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

Yes ✓ No ___ NA ___

Comments ___

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

Yes ___ No ___ NA ✓

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

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

Yes ___ No ___

Comments ___

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

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

Yes ___ No ✓ List ___

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

Yes ___ No ✓ List ___

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

Yes ___ No ✓ List ___

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

Yes ___ No ✓ List ___

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

Yes ___ No ✓ List ___

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

Yes ___ No ✓ List _____

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

Yes ___ No ✓ List _____

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

Yes ___ No ✓ List _____

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

Yes ___ No ✓ List _____

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

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

Yes ___ No ✓ List _____

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

Yes ___ No ✓ List _____

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

RCRA LAND DISPOSAL RESTRICTION INSPECTION

III. GENERATOR REQUIREMENTS

A. Treatability Group/Treatment Standard Identification*

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

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

Yes ✓ No ___ NA ___

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

Waste Code	Wastewater*	Nonwastewater
F001	___	✓
F002	___	✓
F003	___	✓
F005	___	✓

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

Comments _____

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

Yes ___ No ___ NA ✓

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

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

Comments _____

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

3. First, Second, and Third Third Wastes:

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

Yes ✓ No ___ NA ___

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

Waste Code	Subcategory	Wastewater*	Nonwastewater
D001			✓

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

Comments_____

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

Yes ✓ No __ NA __

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

Yes __ No __ NA ✓

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

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

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

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

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

Yes __ No __ NA ✓

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

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

a. Liquid hazardous wastes containing PCBs ≥50 ppm

Yes __ No __ NA ✓

If yes, check the appropriate treatability group:

__ 50 to 500 ppm PCBs
__ ≥500 ppm PCBs

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

Yes ___ No ___ NA ✓

If yes, check the appropriate treatability group:

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

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

Yes ___ No ___ NA ✓

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

Yes ___ No ___ NA ✓

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

Yes ___ No ___ NA ✓

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

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

Comments _____

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

Yes ___ No ✓ NA ___

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

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

Comments _____

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

Yes ___ No ✓

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

Yes ___ No ___

Comments _____

B. **Waste Analysis**

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

Yes ✓ No ___

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

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

Yes ___ No ___

Comments _____

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

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

a. Knowledge of waste:

Yes ✓ No ___

If yes, list the wastes for which applied knowledge was used and describe the basis of determination. Attach documentation. [40 CFR 268.7(a)(5)]
All shipments are analyzed on site: GC, PCBs, Spec. Gravity, pH, % water, etc.

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

Yes ___ No ___ NA ✓

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

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

_____

_____

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

Yes ___ No ___ NA ✓

*See Appendix C for exceptions.

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

_____

_____

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

Yes ___ No ___ NA ✓

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

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

_____

_____

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

Yes ___ No ✓ (If No, go to 4.)

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

Yes ___ No ___

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

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

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

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

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

Yes ___ No ___

Comments _____

4. Dilution Prohibition [40 CFR 268.3]:

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

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

Yes ___ No ✓ (If No, go to b.)

List the wastes _____

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

Yes ___ No ___

Comments _____

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

Yes ___ No ✓ (If No, go to c.)

Check appropriate category:

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

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

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

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

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

_____

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

Yes ___ No ✓

Comments _____

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

Yes ___ No ___ NA ✓

C. **Management**

1. On-Site Management

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

Yes ✓ No ___

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

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

Comments_____

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

Yes ___ No ___ NA ✓

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

Yes ___ No ___ NA ✓

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

2. Off-Site Management: Waste Exceeds Treatment Standards

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

Yes ✓ No ___ (If No, go to 3.)

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

Waste Code	Receiving Facility
D001	SK - Dolton, IL + Franklin Park, IL.
F001	SK - Clarksville, MO + Hebron, OH
F002	
F003	
F005	

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

Yes ✓ No ___ (If No, go to 3.)

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

Yes ___ No ___ NA ___

b. Is a notification sent with each waste shipment?

Yes ✓ No ___

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

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

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

Waste Code	Subsequent Handler
___	_____
___	_____
___	_____

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

Yes ___ No ___

3. Off-Site Management: Waste Meets Treatment Standards

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

Yes ___ No ✓ (If No, go to 4.)

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

Waste Code	Receiving Facility
___	_____
___	_____
___	_____

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

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

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

Yes ___ No ___

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

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

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

Waste Code	Subsequent Handler
___	___
___	___
___	___

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

Yes ___ No ___

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

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

Complete the following table:

Waste Code	Receiving Facility
___	___
___	___
___	___

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

Yes ___ No ___

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

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

Yes ___ No ✓ (If No, go to 5.)

Complete the following table:

Waste Code	Receiving Facility
___	___
___	___
___	___

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

Yes ___ No ___

b. Is a notification sent with each waste shipment?

Yes ___ No ___

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

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

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

Waste Code	Subsequent Handler
___	_____
___	_____
___	_____

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

Yes ___ No ___

5. Records Retention

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

Yes ✓ No ___

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

Yes ___ No ___ NA ✓

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

Yes ___ No ___ NA ✓

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

Comments_____

D. **Treatment Using RCRA 40 CFR Parts 264 and 265 Exempt Units or Processes**

1. Are restricted wastes treated in RCRA exempt units (i.e., boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.)?

   Yes ✓ No ___ (If No, do not complete this section.)

   List types of waste treatment units and processes:

Waste Code	Type of Treatment	Treatment Units and Processes
F001	Reclamation	Distillation Unit
F002		Wastewater Treatment Unit
F003		
F005		

2. Are treatment residuals generated from these units?

   Yes ✓ No ___

   Comments _____

3. Are residuals further treated, stored for greater than 90/180 days, or disposed on site?

   Yes ✓ No ___ NA ___

   (If yes, the TSD checklist must also be completed.)

E. **Additional Comments, Concerns, or Issues Not Addressed in the Checklist:**

RCRA LAND DISPOSAL RESTRICTION INSPECTION

IV. TSD REQUIREMENTS

A. Waste Analysis [40 CFR 268.7(b), 264.13, and 265.13]

1. Does the waste analysis plan address the following LDR waste categories? [40 CFR 264.13(b)(6) and 265.13(b)(6)]

F001-F005 Spent Solvents	Yes ✓	No ___	NA ___
F020-F023 and F026-F028 Dioxins	Yes ___	No ___	NA ✓
California List Wastes	Yes ✓	No ___	NA ___
First, Second, and Third Third Wastes	Yes ✓	No ___	NA ___

Comments _____

2. Has the waste analysis plan been revised to address F039 multi-source leachate?

Yes ___ No ___ NA ✓

3. What date was the waste analysis plan last revised? 9/28/90

4. Does analytical data contain all the information required to treat, store, or dispose of restricted wastes? [40 CFR 264.13(a)(1) and 265.13(a)(1)]

Yes ✓ No ___

If yes, which of the following are sources of analytical data? (More than one may apply.):

✓ Generator provides data
✓ Facility performs analyses in on-site laboratory
___ Facility contracts analyses at off-site laboratory

If the generator provides data, does the facility provide corroborative testing? [40 CFR 264.13(a)(2) and 265.13(a)(2)]

Yes ✓ No ___ NA ___

If analyses are conducted off site, identify lab: _____

a. Are wastes with treatment standards specified in 40 CFR 268.41 analyzed using the toxicity characteristic leaching procedure (TCLP)?* (BDAT** = stabilization/immobilization technology) [40 CFR 268.7(b)(1)]

Yes ___ No ___ NA ✓

*See Appendix C for exceptions.
**BDAT = best demonstrated available technology. See Appendix A.

If yes, list the wastes for which TCLP was used and provide the date of last test, frequency of testing, and note any problems. Attach test results. [40 CFR 264.73 (b)(3) and 265.73(b)(3)]

b. Are wastes with treatment standards specified in 40 CFR 268.43 analyzed using total constituent analysis?* (BDAT = destruction/removal technology) [40 CFR 268.7(b)(3)]

Yes ___ No ___ NA ✓

*See Appendix C for exceptions.

If yes, list the wastes for which total constituent analysis was used and provide the date of last test, frequency of testing, and note any problems. Attach test results. [40 CFR 264.73 (b)(3) and 265.73(b)(3)]

c. Is the paint filter liquids test (PFLT) used to determine if California List wastes are contained in *liquid* hazardous waste? [40 CFR 268.32(i)]

Yes ___ No ___ NA ✓

If yes, list the wastes for which PELT was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results. [40 CFR 264.73(b)(3) and 265.73(b)(3)]

B. Operating Record [40 CFR 264.73 and 265.73]

1. Does the operating record contain records and results of waste analyses performed as specified in 40 CFR 268.4 and/or 40 CFR 268.7(b)? [40 CFR 264.73(b)(3) and 265.73(b)(3)]

Yes ✓ No ___

2. Does the operating record contain copies of LDR notifications and certifications?* [40 CFR 264.73(b)(11), (13), and (15) and 40 CFR 265.73(b)(11), (13), and (15)]

Yes ✓ No ___

*Include both those received from generators, and those prepared for off-site shipments.

3. Does the operating record include appropriate documentation for restricted wastes which are managed wholly on site? [40 CFR 264.73(b)(12), (14), and (16) and 265.73(b)(12), (14), and (16)]

Yes ✓ No ___ NA ___

Does the documentation discussed in points 2. and 3. reflect proper historical management of wastes previously covered under expired national capacity variances, case by case extensions, and the soft hammer provision?*

Yes ___ No ___ NA ✓

*Note that the soft hammer provision expired as of 05/08/90. Soft hammer wastes which had treatment standards established in the Third Third rule were granted a minimum 90-day national capacity variance to 08/08/90.

C. **Storage [40 CFR 268.50]**

1. Are prohibited* wastes stored on site in containers?

Yes ✓ No ___ (If No, go to 2.)

*See Appendix E for distinction between restricted and prohibited wastes.

Are all containers clearly marked to identify the contents and date(s) entering storage? [40 CFR 268.50(a)(2)(i)]

Yes ✓ No ___

Have wastes been stored for more than one year since the applicable LDR regulations went into effect?

Yes ___ No ✓ (If No, go to 2.)

Can the facility show that such accumulation is necessary to facilitate property recovery, treatment, or disposal? [40 CFR 268.50 (c)]

Yes ___ No ___

If yes, state how:_____

2. Are prohibited wastes stored on site in tanks?

Yes ✓ No ___ (If No, go to 3.)

Are all tanks clearly marked with a description of the contents, the quantity of each hazardous waste received, and date each period of accumulation begins, or is such information recorded and maintained in the operating record? [40 CFR 268.50(a)(2)(ii)]

Yes ✓ No ___

Have tanks been emptied at least once per year since the applicable LDR regulations went into effect?

Yes ✓ No ___ (If Yes, go to 3.)

Can the facility show that such accumulation is neccesary to facilitate proper recovery, treatment, or disposal? [40 CFR 268.50(c)]

Yes ___ No ___

If yes, state how:_____

3. Does the facility store liquid hazardous waste containing PCBs at concentrations greater than or equal to 50 ppm?

Yes ___ No ✓ (If No, go to D.)

Does the facility meet the TSCA criteria in 40 CFR 761.65(b)? [40 CFR 268.50(f)]

Yes ___ No ___

Have these wastes been stored for more than one year? [40 CFR 268.50(f)]

Yes ___ No ___

D. Treatment

1. Does the facility treat restricted wastes other than in surface impoundments?

Yes ✓ No ___ (If No, do not complete this section. Go to E.)

2. Are required technologies used to treat wastes which have treatment standards specified in 40 CFR 268.42? [40 CFR 268.40(b)]

Yes ✓ No___ NA___ (If Yes or NA, go to 3.)

Was an alternative method approved?

Yes___ No___

List each waste code, the technology specified in 40 CFR 268.42, and the alternative method. Check if approval of the alternative method is documented. [40 CFR 268.42(b)]

Waste Code	Required Technology	Alternative Method	Approval

3. Lab packs: If alternative treatment standards are specified, are incinerator residues from lab packs containing D004, D005, D006, D007, D008, D010, and D011 treated in compliance with the subpart D treatment standards for these characteristic wastes? [40 CFR 268.42(c)(4)]

Yes___ No___ NA ✓

4. Describe all other waste codes and treatment processes:

Waste Code	Treatment Processes
F001, D001	Distillation, Fractionation
F002	Liquid - Liquid Extraction
F003	
F005	

5. Characteristic wastes:

Is the 40 CFR Part 268 treatment standard lower than the 40 CFR Part 261 characteristic level?*

Yes ✓ No ___

*This applies to both concentration based treatment standards specified in 40 CFR 268.41 and 268.43, and to some 40 CFR 268.42 required methods which result in treatment below the characteristic level. See Appendix D.

If yes, does the facility manage the waste as restricted until 40 CFR Part 268 treatment standards are met, even after the waste is rendered non-hazardous? [40 CFR 268.9(d)]

Yes ✓ No ___

Comments ___

6. Dilution Prohibition [40 CFR 268.3]:

a. Does the facility mix prohibited wastes with different treatment standards?

Yes ___ No ✓ (If No, go to c.)

List the wastes ___

b. Are the wastes amenable to the same type of treatment? [55 FR 22666]

Yes ___ No ___

If yes, is this method used for the aggregated wastes?

Yes ___ No ___

Comments ___

c. Based on an assessment of points a. and b., or any other relevant information, is dilution used as a substitute for treatment? [40 CFR 268.3(a)]

Yes ___ No ✓

Comments ___

7. Does the facility, in accordance with an acceptable waste analysis plan, test residues from all treatment processes? [40 CFR 268.7(b)]

Yes ✓ No ___

Comments _____

8. Does the facility ship any characteristic wastes which have been rendered non-hazardous to a Subtitle D facility?

Yes ___ No ✓ (If No, go to 9.)

Complete the following table:

Waste Code	Receiving Facility
___	_____
___	_____
___	_____

Are a notification and a certification for each shipment sent to the Regional Administrator or authorized State? [40 CFR 268.9(d)(1) and 268.7(b)(5)]

Yes ___ No ___

9. Does the facility ship any wastes or treatment residues to an off-site land disposal facility?

Yes ___ No ✓ (If No, go to 10.)

Complete the following table:

Waste Code	Receiving Facility
___	_____
___	_____
___	_____

Are a notification and a certification provided to the land disposal facility with each waste shipment? [40 CFR 268.7(b)(4) and 40 CFR 268.7(b)(5)]

Yes ___ No ___

10. Does the facility ship any wastes or treatment residues to be further managed at a different treatment or storage facility?

Yes ✓ No ___ (If No, go to E.)

Complete the following table:

Waste Code	Receiving Facility
F001,2,3,5	S-K: Clarksville, MO + Hebron, IN
D001	SK: Dutton, IL + Franklin Park, IL

Are appropriate generator notifications and certifications provided to the receiving facility with each waste shipment? [40 CFR 268.7(b)(6)]

Yes ✓ No ___

E. Surface Impoundments [40 CFR 268.4]

1. Are restricted wastes placed in surface impoundments for treatment?

   Yes ___ No ✓ (If No, go to F.)

   List _____

2. Are evaporation or dilution the only recognizable treatment occurring in the surface impoundment? [40 CFR 268.3(a) and 268.4(b)]

   Yes ___ No ___

   Comments _____

3. Has the facility submitted to the Agency a waste analysis plan and certification of compliance with minimum technology requirements and ground-water monitoring requirements? [40 CFR 268.4(a)(4)]

   Yes ___ No ___

4. If the minimum technology requirements have not been met, has a waiver been granted for that unit? [40 CFR 268.4(a)(3)(ii)]

   Yes ___ No ___ NA ___

5. Are representative samples of sludge and supernatant from the surface impoundment tested separately, acceptably, and in accordance with the sampling frequency and analyses specified in the waste analysis plan? (Attach test results.) [40 CFR 268.4(a)(2)(i)]

   Yes ___ No ___

6. Does the operating record adequately document the results of waste analyses performed in accordance with 40 CFR 268.4? [40 CFR 264.73(b)(3) and 265.73(b)(3)]

   Yes ___ No ___

   Comments _____

7. Do the treatment residues (sludges or liquids) exceed applicable treatment standards/prohibition levels?

Sludge Yes ___ No ___ Waste Code _____
Supernatant Yes ___ No ___ Waste Code _____

Provide the frequency of analyses conducted on treatment residues:

_____

8. If sludge residues exceed treatment standards/prohibition levels, are they removed on an annual basis? [40 CFR 268.4(a)(2)(ii)]

Yes ___ No ___ NA___

Comments _____

Are residues subsequently managed in another surface impoundment? [40 CFR 268.4(a)(2)(iii)]

Yes ___ No ___

9. If supernatant is determined to exceed treatment standards, is annual throughput greater than impoundment volume? [40 CFR 268.4(a)(2)(ii)]

Yes ___ No ___ NA___

Comments_____

F. **Land Disposal**

1. Are restricted wastes placed in or on the land in units such as landfills, surface impoundments*, waste piles, land treatment units, salt domes/beds, mines/caves, concrete vaults, or bunkers? [40 CFR 268.2(c)]

Yes ___ No ✓ (If No, go to G.)

*Note: Do not include surface impoundments addressed in E.

If yes, specify which units and what wastes each unit has received:

Unit	Waste

2. Does the facility, in accordance with an acceptable waste analysis plan, test prohibited wastes prior to land disposal to ensure that all applicable treatment standards and/or prohibition levels have been met? [40 CFR 268.7(c)(2)]

Yes ___ No ___

Comments_____

3. Does the facility test wastes to ensure that they do not exhibit any characteristics at the point of disposal?* [40 CFR 268.9(c)]

Yes ___ No ___ NA___

*Note: A waste may exceed a characteristic level only if the treatment standard for that characteristic has been met.

4. Does the operating record adequately document the results of waste analyses performed in accordance with 40 CFR 268.7(c)? [40 CFR 264.73(b)(3) and 265.73(b)(3)

Yes ___ No ___

If yes, at what frequency are analyses performed?_____

_____

5. Does the facility land dispose of restricted wastes which are not prohibited?

Yes ___ No ___ (If No, go to 6.)

List waste codes in appropriate category below:

National Capacity Variance (40 CFR Part 268, Subpart C)_____
Case-By-Case Extension (40 CFR 268.5)_____
No-Migration Petition (40 CFR 268.6)_____
Treatment Standard Variance (40 CFR 268.44)_____

Does the operating record contain records of the quantities, date of placement, and a copy of the generator notification [40 CFR 268.7(a)(3)] for each shipment of restricted waste subject to a case-by case extension or no-migration petition? [40 CFR 264.73(b)(10) and 265.73(b)(10)]

Yes ___ No ___ NA ___

Do land disposal units receiving wastes covered by a national capacity variance or case-by-case extension meet the requirements in 40 CFR 268.5(h)(2)?

Yes ___ No ___ NA ___

If the facility has a case-by-case extension, is progress being made as described in reports to the Regional Administrator?

Yes ___ No ___ NA ___

6. Are restricted wastes placed in underground injection wells?

Yes ___ No ___ List _____

G. **Other Wastestreams**

1. Does the facility generate wastes other than residues from RCRA treatment units?

   Yes ✓ No ___ (If No, go to H.)

2. On-Site Management

   a. If characteristic wastes are treated in systems regulated under the Clean Water Act, have the following been documented: the determination of restriction, how restricted wastes are managed, and why wastes discharged pursuant to an NPDES permit are not prohibited (if applicable)? [55 FR 22662]

   Yes ___ No ___ NA ✓

   b. If characteristic wastes are treated in RCRA exempt units to render them non-hazardous, are the wastes managed as restricted until 40 CFR Part 268 treatment standards are met?* [40 CFR 268.9(d)]

   Yes ___ No ___ NA ✓

   *This applies to both concentration based treatment standards specified in 40 CFR 268.41 and 268.43, and to some 40 CFR 268.42 required methods which result in treatment below the characteristic level. See Appendix D.

3. Off-Site Management: Waste Exceeds Treatment Standards

   Are wastes that exceed treatment standards/prohibition levels (not subject to a national capacity variance) shipped to an off-site treatment or storage facility?

   Yes ✓ No ___ (If No, go to 4.)

   Identify wastes code(s) and off-site treatment or storage facilities to which wastes are shipped.

Waste Code	Receiving Facility
F001, 2	S-K: Hebron, OH
F003, 5	S-K: Dolton IL
D001	S-K: Franklin Park, IL

   Are LDR notifications provided for each shipment to the treatment or storage facility? [40 CFR 268.7(a)(1)]

   Yes ✓ No ___ (If No, go to 4.)

If alternative treatment standards are specified for lab packs, is the certification required in 40 CFR 268.7(a)(7) or (8) included with the notification?

Yes ___ No ___ NA ✓

4. Off-Site Management: Wastes Meets Treatment Standards

a. Are wastes that meet treatment standards/prohibition levels shipped to an off-site disposal facility?

Yes ___ No ✓ (If No, go to 5.)

Identify waste code(s) and off-site disposal facilities:

Waste Code	Receiving Facility
_____	_____
_____	_____
_____	_____

Are LDR notifications and certifications provided for each shipment to the disposal facility? [40 CFR 268.7(a)(2)(i) and 268.7(a)(2)(ii)]?

Yes ___ No ___ (If No, go to b.)

b. Are characteristic wastes which have been rendered non-hazardous (in a RCRA exempt unit) shipped to a Subtitle D facility?

Yes ___ No ___ NA ___ (If No or NA, go to 5.)

Complete the following table:

Waste Code	Receiving Facility
_____	_____
_____	_____
_____	_____

Are a notification and a certification for each shipment sent to the Regional Administrator or authorized State? [40 CFR 268.9(d)(1) and 268.7(b)(5)?

Yes ___ No ___

5. Off-Site Management: Wastes Subject to Variances, Extensions, or Petitions

a. Are wastes that are subject to a national capacity variance (40 CFR Part 268, Subpart C) or a case-by-case extension (40 CFR 268.5) shipped to a treatment, storage, or disposal facility?

Yes ___ No ✓ (If No, go to 6.)

Complete the following table:

Waste Code	Receiving Facility
___	___
___	___
___	___

b. Are LDR notifications (stating that the waste is not prohibited from land disposal) provided for each shipment to the off-site receiving facility? [40 CFR 268.7(a)(3)]

Yes ___ No ___

6. Dilution Prohibition [40 CFR 268.3]:

a. Are prohibited* wastes with different treatment standards mixed?

*See Appendix E for distinction between restricted and prohibited wastes.

Yes ___ No ✓ (If No, go to b.)

List the wastes ___

Are the wastes amenable to the same type of treatment? [55 FR 22666]

Yes ___ No ___

Comments ___

b. Are prohibited wastes diluted to meet treatment standard criteria, or render them non-hazardous? [55 FR 22665-22666]

Yes ___ No ✓ (If No, go to c.)

Check appropriate category:

___ Dilutes to meet treatment standards
___ Dilutes to render waste non-hazardous

Do wastes fall into the following categories? (Check if appropriate.) [40 CFR 268.3(b)]

___Managed in treatment systems regulated under the Clean Water Act
___Non-toxic* characteristic wastes
___Treatment standard specified in 40 CFR 268.41 or 268.43

*Non-toxic = D001 (except high TOC nonwastewaters), D002, and D003 (except cyanides and sulfides). [55 FR 22666]

If the wastes do not fall into the above categories, briefly describe the conditions under which they were diluted.

_____
_____
_____

c. Based on an assessment of points a. and b., and any other relevant circumstances, are prohibited wastes diluted as a substitute for adequate treatment? [40 CFR 268.3(a)]

Yes ___ No ✓

Comments_____

H. Additional Comments, Concerns, or Issues Not Addressed in the Checklist:

_____
_____
_____
_____
_____
_____
_____
_____
_____
_____
_____
_____
_____
_____
_____
_____
_____
_____
_____
_____
_____
_____
_____
_____
_____
_____

Name of Facility: SAFETY-KLEEN CORP. CHICAGO RC

I.D. Number: 031600003 - ILD005450697

Location: 1445 West 42nd Street
Chicago, IL 60609

Date of Inspection: JANUARY 26, 1993

Inspector: Anna Van Orden

Telephone Number: 708-531-5900

- [ ] Interim Status
- [x] RCRA Permit
- [x] Treatment
- [x] Storage
- [ ] Disposal
- [ ] Land Disposal Facility

Are there any known releases? Yes ✓ No ___

Does the unit receiving CERCLA waste meet the double liner requirements? Yes ___ No ✓

Any Class I violations? Yes ___ No ✓

mailed to USEPA 1-27-93

If yes, identify type briefly

Schedule for next inspection: July 1993

Please complete this form and mail it within 24 hours of the date of inspection.

RECEIVED
FEB 16 1993
OFFICE OF RCRA
WASTE MANAGEMENT DIVISION
EPA, REGION V

RECEIVED
WMD RECORD C[illegible]
FEB 2[illegible]

Illinois Environmental Protection Agency
Division of Land Pollution Control

RCRA INSPECTION REPORT

USEPA #: IL D005450697 | IEPA #: 0316000053

Facility Name: SAFETY-KLEEN CORP. CHICAGO RC | Phone #: (312) 247-2828

Street Address: 1445 WEST 42ND STREET | County: COOK

City: CHICAGO | State: ILLINOIS | Zip: 60609

Region: MAYWOOD | Inspection Date: 7/21/92 | From: 9:30am | To: 1:15pm

Weather: 70°

TYPE OF FACILITY

Notified As: G, TRANS, TSD, WAF, OSF | Regulated As: G, S, WAF

LDF? No (Yes or No) HPV? NO | 90-Day F/U Required?: YES ____ NO ✓

TYPE OF INSPECTION

CEI: ✓ Sampling: ____ Citizen Complaint: ____ Closed: ____ Other: ____

CME/O&M: ____ Record Review: ____ Follow-Up to Inspection of: ____ Withdrawal: ____

NON-REGULATED STATUS N/A

SQG: ____ Claimed Nonhandler: ____ Other (Specify in Narrative): ____

PART A

Notification Date: 8/5/80, from (initial) or (subsequent) Notification.

Initial Part A Date: 11/19/80 | Amended: 9/24/90

Part A Withdrawal requested: __/__/__ | Approved by (US)(IL) EPA: __/__/__

PART B PERMIT APPLICATION

Part B Permit Submitted: (Y) or N 11/9/88 | Final Permit Issued: __/__/__

ENFORCEMENT N/A

Has the firm been referred to – USEPA: Y or (N) __/__/__

Illinois Attorney General: Y or (N) __/__/__ | County State's Attorney: Y or (N) __/__/__

ORDERS ISSUED N/A

CACO: __/__/__ | CAFO: __/__/__ | Consent Decree: __/__/__

Federal Court Order: __/__/__ | State Court Order: __/__/__ | IPCB Order: __/__/__

TSD FACILITY ACTIVITY SUMMARY

Activity by Process Code	On Part A?	Activity Conducted Prior to 1980?	Was Activity Ever Done?	Closed	Being done at Time of Insp.?	Exempt per 35 IAC, Sec.	On Annual Report 1991	1990	1989
S01	YES	YES	YES	NO	YES	N/A	YES	YES	YES
S02	YES	YES	YES	NO	YES	N/A	YES	YES	NO
R03	N/A	YES	YES	N/A	YES	725.101 (c)(6)	NO	NO	NO

IL 532-1834

OWNER	OPERATOR
Name SAFETY-KLEEN CORP.	Name SAFETY-KLEEN CORP. CHICAGO RC
Address 777 BIG TIMBER ROAD	Address 1445 WEST 42ND STREET
City ELGIN	City CHICAGO
State ILLINOIS Zip 60173	State ILLINOIS Zip 60609
Phone # (708) 697-8460	Phone # (312) 247-2828

PERSON(S) INTERVIEWED	TITLE	PHONE #
ALFRED AGHAIEPOUR	FACILITY MANAGER	(312) 247-2828
TED ZAJACK	OPERATIONS MANAGER	(312) 247-2828

INSPECTION PARTICIPANT(S)	AGENCY/TITLE	PHONE #
DONNA CZECH	IEPA/EPS	(708) 531-5900
ANNA VAN ORDEN	IEPA/LSCT	(708) 531-5900

PREPARED BY	AGENCY/TITLE	PHONE #
DONNA CZECH	IEPA/EPS	(708) 531-5900

SUMMARY OF APPARENT VIOLATIONS

Area	Class	Section

Area	Class	Section

Area	Class	Section

RECEIVED
30 JUL 1992
IEPA/DLPC

Facility Name: SAFETY-KLEEN CORP. CHGO. RC

USEPA #: D005450697

IEPA #: 0316000053

WASTE DISPOSITION FORM

Waste Name (include haz & waste for which no determination has been made)	Generating Process (For waste gen. on site. N/A for TSD)	Date of Last Analysis	USEPA Haz Waste #	* On 8700-12	* On 3510-3	On Annual Report for: (Circle if present; cross out if not present) * 19 91	* 19 90	* 19 89	Amount on Site	Rate of Generation	Last Manifested Shipment	Disposition
STILL BOTTOMS	RESIDUAL MATERIAL FROM THE DISTILLATION PROCESS	EVERY SHIPMENT ANALYZED	F001 F002 F003 F005	YES	YES	G F	G F	G F	12,245 gal.	30-50,000 gal/mo.	7-13-92	SAFETY-KLEEN in CLARKSVILLE, MISSOURI for BLENDING/RECLAMATION
MISCELLANEOUS DRUMMED WASTE	-CLEANING OUT TANKS -USED OIL DRY -HOSE DRIPPINGS -CUT METAL DRUMS	EVERY SHIPMENT ANALYZED	F001 F002	YES	YES	G F	G F	G F	188 drums	40-60 drums/mo.	6-8-92	SAFETY-KLEEN in HEBRON, OHIO for BLENDING/RECLAMATION
REMANIFESTED WASTE	-TEMPORARY STORAGE -SHIPPED FOR FURTHER RECLAMATION -WASTE SENT IN ERROR	EVERY SHIPMENT ANALYZED	F001 F002 D001	YES	YES	G F	G F	G F	—	20-40,000 gal/year	4-20-92	SAFETY-KLEEN in DOLTON, ILLINOIS for BLENDING/RECLAMATION
WASTE FILTERS	USED TO FILTER WASTE AND PRODUCT AS MATERIAL ENTERS TANKS	EVERY SHIPMENT ANALYZED	F001 F002 F003 F005	YES	YES	G F	G F	G F	23 drums	~30 drums/mo.	4-3-92	SAFETY-KLEEN in HEBRON, OHIO for TREATMENT
SPENT SOLVENT	FROM TWO PARTS WASHERS AND ONE IMMERSION CLEANER	BULK ANALYSIS AT REC'G. FACILITY	F005 D001	YES	YES	G F	G F	G F	20 gal.	30 gal/mo.	7-15-92	SAFETY-KLEEN in FRANKLIN PARK, ILLINOIS for STORAGE (TEMP.)
						G F	G F	G F				
						G F	G F	G F				
						G F	G F	G F				
						G F	G F	G F				
						G F	G F	G F				

* All "NO" responses must be explained in narrative.

IL 532-1836
LPC - 326 (12/89) Page 3

0316000053 - Cook County
Chicago/Safety-Kleen Corp. CRC
ILD005450697

NARRATIVE

Safety-Kleen Corp. Chicago Recycle Center is a solvent recovery facility which receives spent solvents, solvent mixtures and other solvent-containing liquid and solid wastes from Safety-Kleen service centers, other Safety-Kleen recycle centers, and from industrial and commercial customers. Wastes are received in containers and in bulk shipments by tank trailer. Spent solvents and solvent-containing wastes are recovered by a combination of processes including neutralization, distillation, fractionation, liquid-liquid extraction and drying. Recovered products are either returned to the Safety-Kleen toll customer or marketed as recovered solvent.

The Chicago Recycle Center handles primarily two accounts: 1) the toll business and 2) the recycling business. The toll business constitutes approximately 55 percent of the total volume of waste handled by the facility. In this situation, the toll customer (generally industrial accounts) ships waste or off specification material to the Chicago Recycle Center for treatment. The facility then recycles the material to the customer's specifications and returns the material to the original generator.

The recycling business consists of industrial solvents which come to the Chicago Recycle Center from the Safety-Kleen sales network. These waste materials are recycled at the facility to Safety-Kleen corporate specifications and the processed material is sold as product on the open market.

Hazardous Wastes

1. Still Bottoms (F001, F002, F003, F005)
   - residual material from the distillation process
   - approximately 30,000-50,000 gallons are generated per month
   - shipped to Safety-Kleen in Clarksville, Missouri for fuel blending or further reclamation
   - 1-2 shipments are made every week
   - 12,245 gallons were on site in bulk storage

2. Miscellaneous Drummed Waste (F001, F002)
   - wastes generated by various methods:
     a) drippings into buckets from hose lines
     b) residual material from cleaning out tanks
     c) used oil dry
     d) "cutters" - drums which must be cut open in order to remove solid material contained inside
   - approximately 40-60 drums are generated per month
   - shipped to Safety-Kleen in Hebron, Ohio for fuel blending or further reclamation
   - shipments are made approximately three times per year
   - 188 drums were on site

RECEIVED
30 JUL 1992
IEPA/DLPC

3. Remanifested Waste (F001, F002, D001)
   - wastes generated by various methods:
     a) waste received that is not intended for reclamation on site but is stored temporarily until it is sent for off-site reclamation
     b) Safety-Solvent received from off site for fractionation but is sent to Safety-Kleen in Dolton when this facility's unit is otherwise occupied
     c) waste sent to this facility erroneously (because the waste fits the description of waste streams that this facility is permitted to accept)
   - approximately 20,000-40,000 gallons are generated per year
   - shipped to Safety-Kleen in Dolton, Illinois for fuel blending or further reclamation
   - at most, shipments are made five times per year
   - none was on site

4. Waste Filters (F001, F002, F003, F005)
   - used to filter waste as it is pumped into tanks
   - approximately 30 drums are generated per month
   - shipped to Safety-Kleen in Hebron, Ohio for treatment
   - at most, three shipments are made per year
   - 23 drums were on site

5. Spent Solvent (D001, F005)
   - from two parts washers and one immersion cleaner unit
   - approximately one 30-gallon drum is generated per month
   - shipped to Safety-Kleen in Franklin Park, Illinois for storage prior to off-site reclamation
   - 20 gallons were on site

<u>Hazardous Waste Units</u>

1. S01 - Container Storage Area #1
   - used for the storage of hazardous and non-hazardous wastes which are generated off site and on site
   - concrete pad with concrete curbs
   - 2-foot wide trench runs along the east side of the area and into a cistern

2. S02 - Tank Farms #1, #2, #3, #4, and #5
   - all are constructed of reinforced concrete with concrete perimeter dikes
   - Tank Farms #1, #2, #3 and #5 have been provided with an impermeable coating as an addition to the existing secondary containment

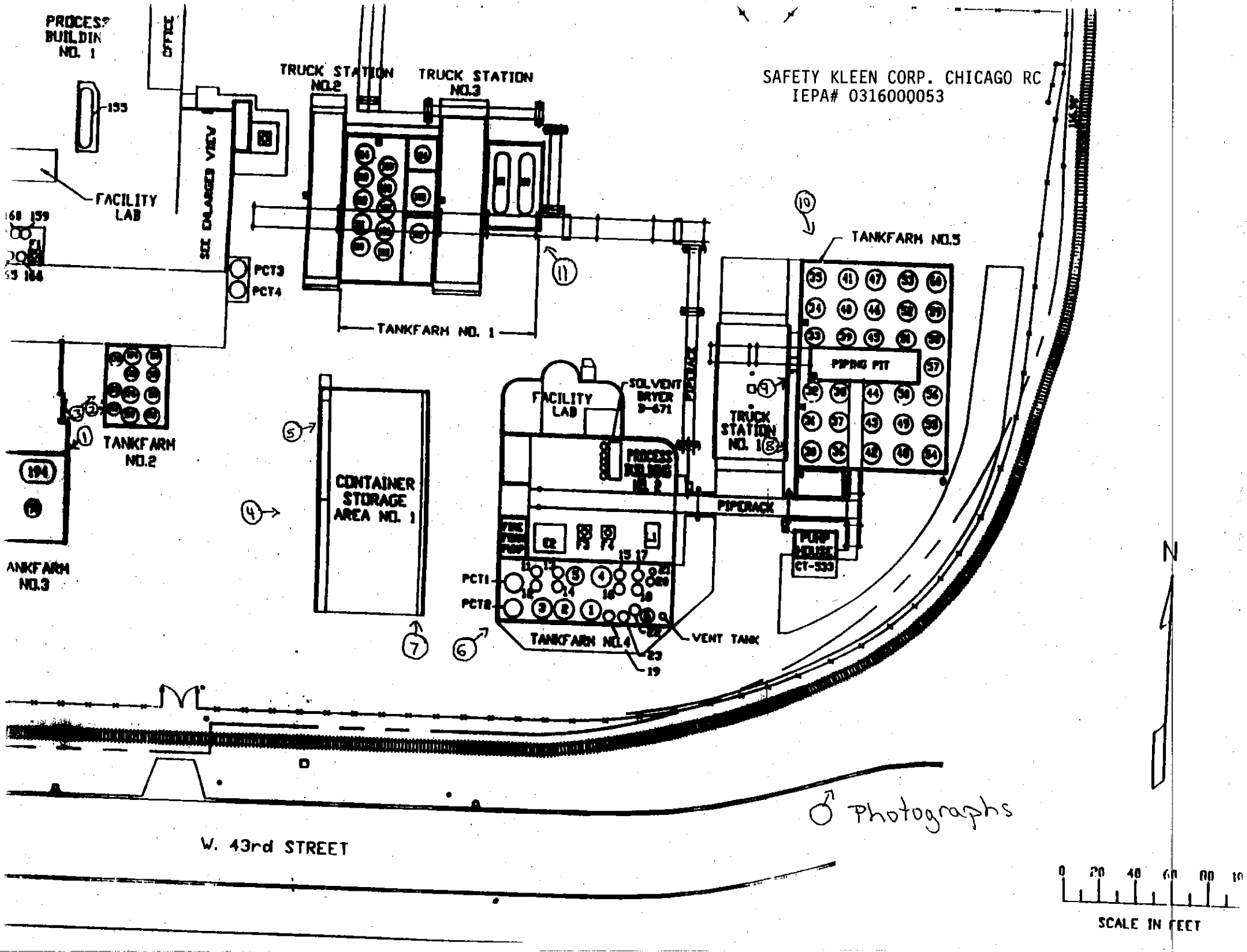
Notes

This facility has received a supplemental permit to accept certain waste solvents from off site on a generic basis for storage, recovery and/or fuel blending. At the time of this inspection, hazardous waste fuel was being blended on site for shipment to the Safety-Kleen facility in Clarksville, Missouri.

Tanks #190-#193 in Tank Farm #3 have been cleaned and removed from the site. The facility is awaiting final certification of closure of these tanks from the project engineer.

At the time of this inspection, this facility was operating as a generator, a storage facility, and a marketer of hazardous waste fuel. The facility appeared to be operating in compliance with all of the applicable RCRA regulations.

DC:lb:15641


SAFETY KLEEN CORP. CHICAGO RC
IEPA# 0316000053
PROCESS BUILDING NO. 1
OFFICE
TRUCK STATION NO.2
TRUCK STATION NO.3
FACILITY LAB
SEE ENLARGED VIEW
PCT3
PCT4
TANKFARM NO. 1
TANKFARM NO.5
PIPING PIT
TANKFARM NO.2
CONTAINER STORAGE AREA NO. 1
FACILITY LAB
SOLVENT DRYER D-671
PROCESS BUILDING NO. 2
TRUCK STATION NO. 1
PIPERACK
PUMP HOUSE CT-533
PCT1
PCT2
TANKFARM NO.4
VENT TANK
TANKFARM NO.3
W. 43rd STREET
Photographs
N
SCALE IN FEET

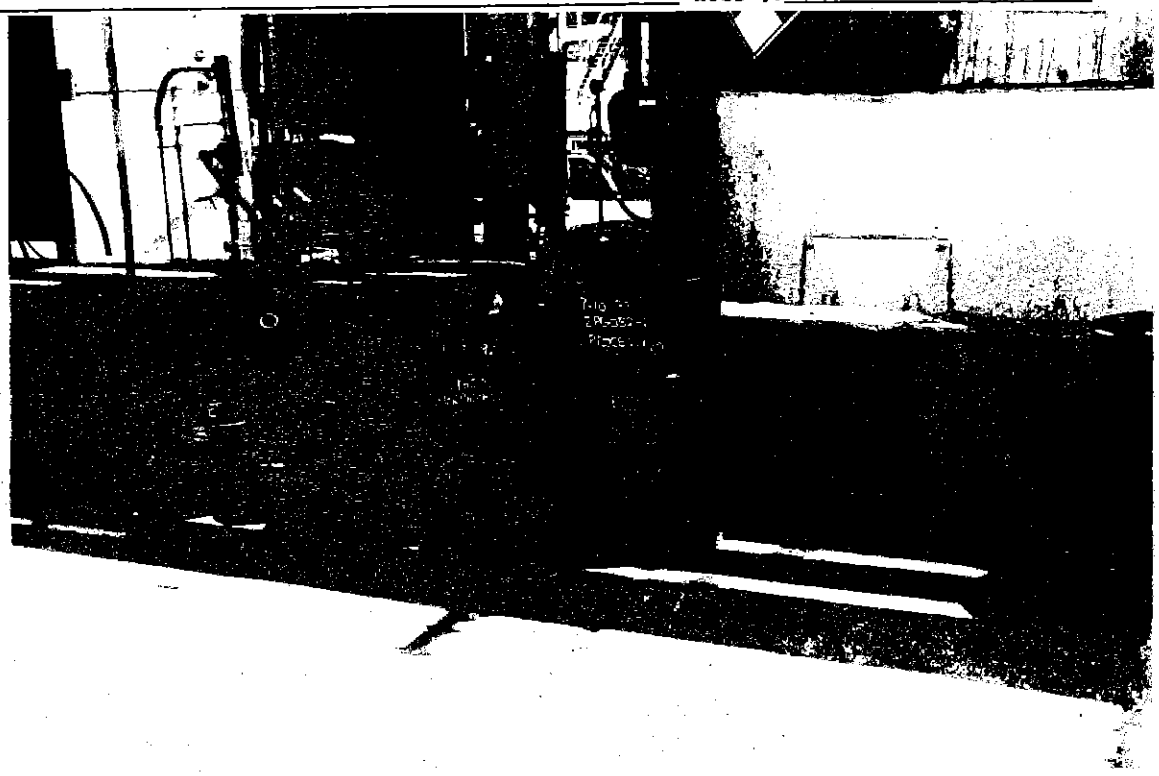
Illinois Environmental Protection Agency Photographs

Site Name: SAFETY KLEEN CORP. CHICAGO RC IEPA #: 0316000053

: July 21, 1992 Time: 9:30A.M.- 1:15P.M. Photograph By: Anna VanOrden

Comments: FACING S-SW: TANK FARM # 3.

Roll #: 93-7 Photo #: 1



Comments: FACING NE: SATELLITE ACCUMULATION AREA LOCATED NEAR TANK FARM #2 Roll #: 93-7 Photo #: 2

RECEIVED
30 JUL 1992
IEPA/DLPC

Illinois Environmental Protection Agency Photographs

Site Name: SAFETY KLEEN CORP. CHICAGO RC IEPA #: 0316000053

July 21, 1992 Time: 9:30A.M.- 1:15P.M. Photograph By: Anna VanOrden

Comments: FACING NE: TANK FARM #2

Roll #: 93-7 Photo #: 3

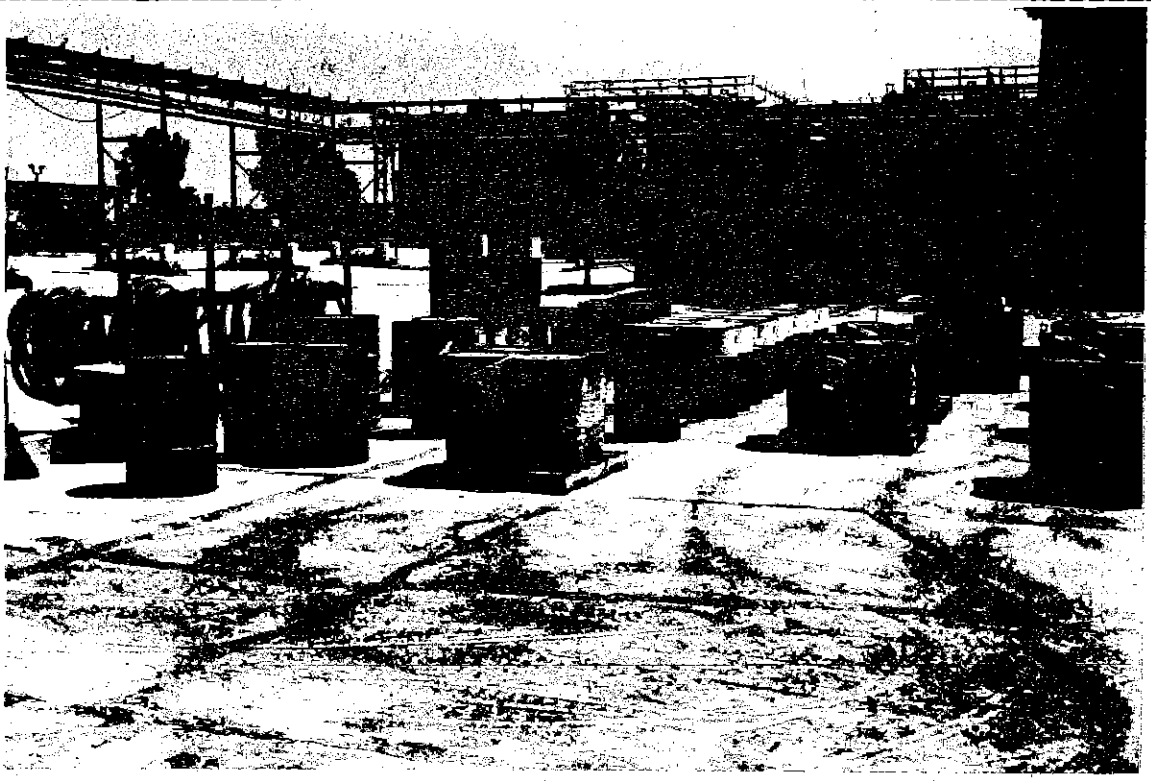
Comments: FACING EAST: CONTAINER STORAGE AREA #1

Roll #: 93-7 Photo #: 4

Illinois Environmental Protection Agency Photographs

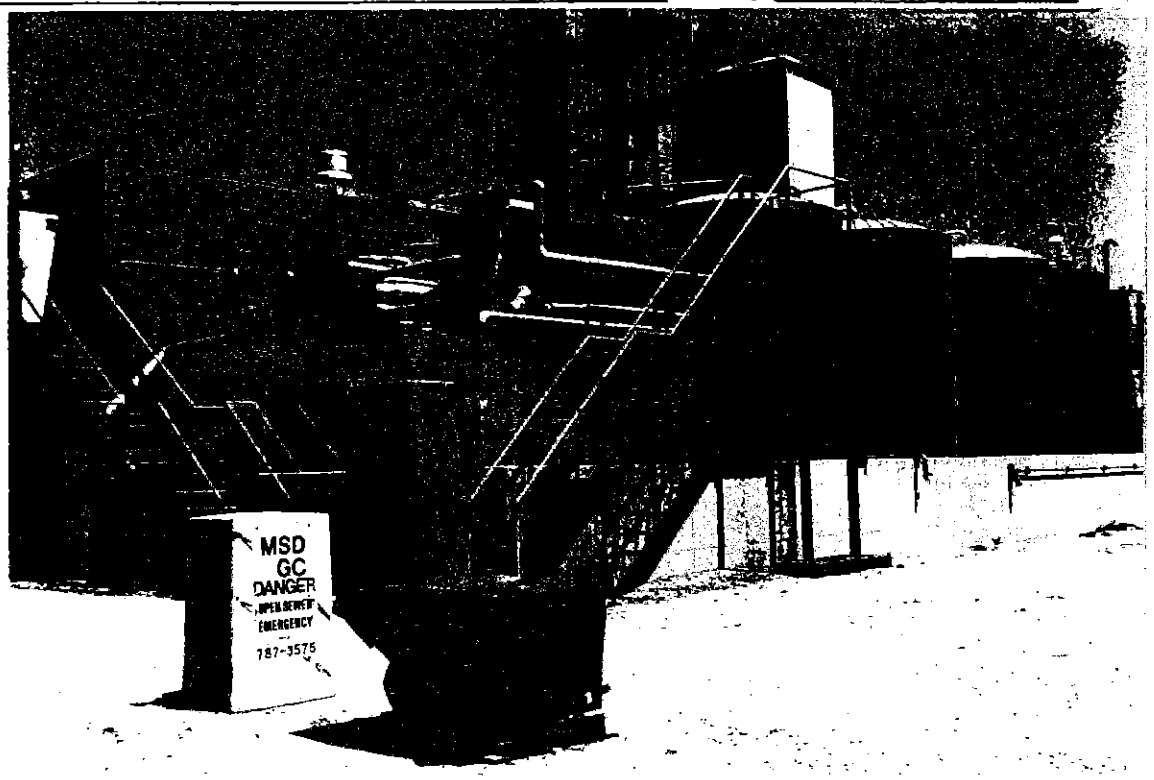
Site Name: SAFETY KLEEN CORP. CHICAGO RC IEPA #: 0316000053

July 21, 1992 Time: 9:30A.M.- 1:15P.M. Photograph By: Anna VanOrden (AVO)



Comments: FACING NE: STAGING AREA FOR CONTAINERS

Roll #: 93-7 Photo #: 5



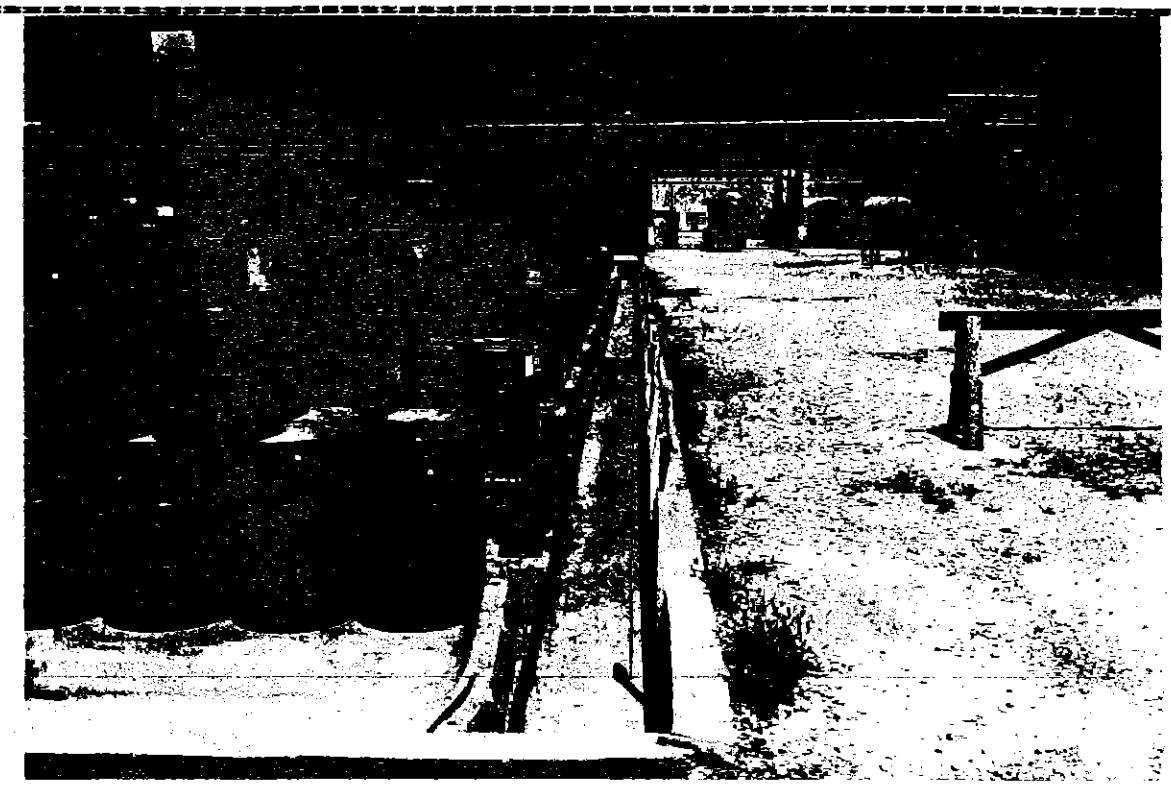
Comments: FACING NE: TANK FARM #4

Roll #: 93-7 Photo #: 6

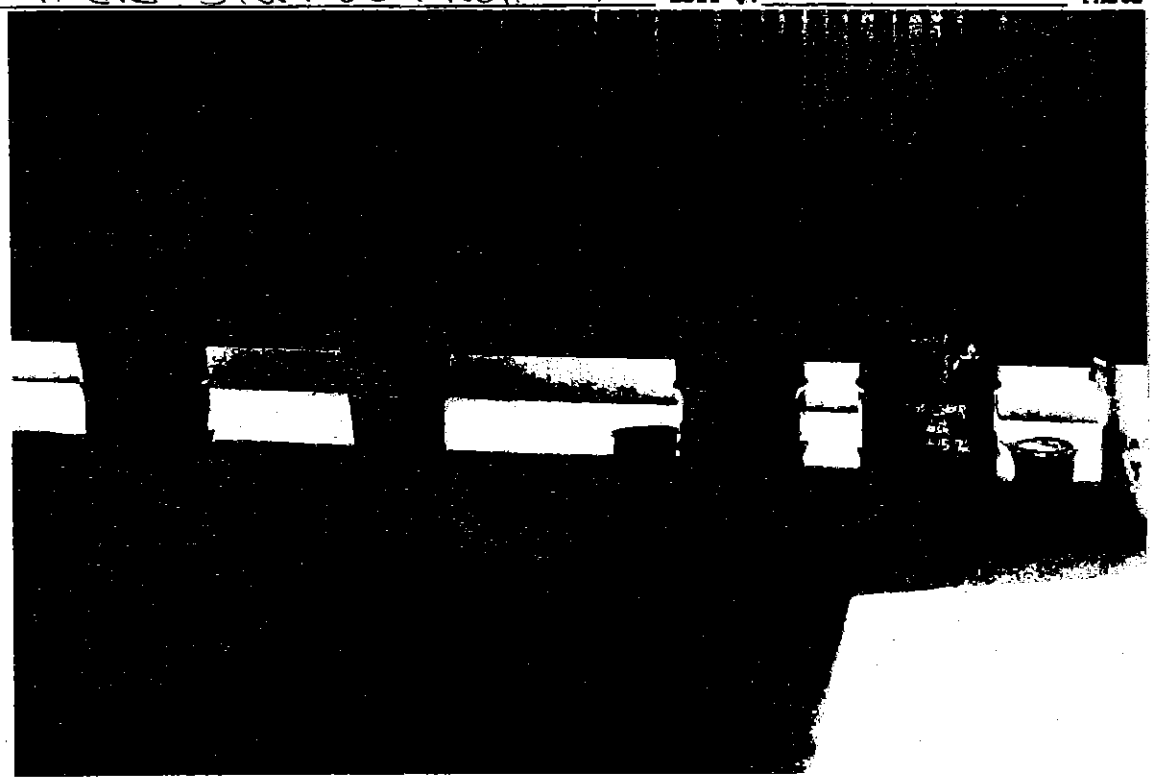
Illinois Environmental Protection Agency Photographs

Site Name: SAFETY KLEEN CORP. CHICAGO RC IEPA #: 0316000053

July 21, 1992 Time: 9:30A.M.- 1:15P.M. Photograph By: Anna VanOrden (AVO)



Comments: FACING NORTH: TRENCH RUNNING ALONG EAST SIDE OF CONTAINER STORAGE AREA #1 Roll #: 93-7 Photo #: 7

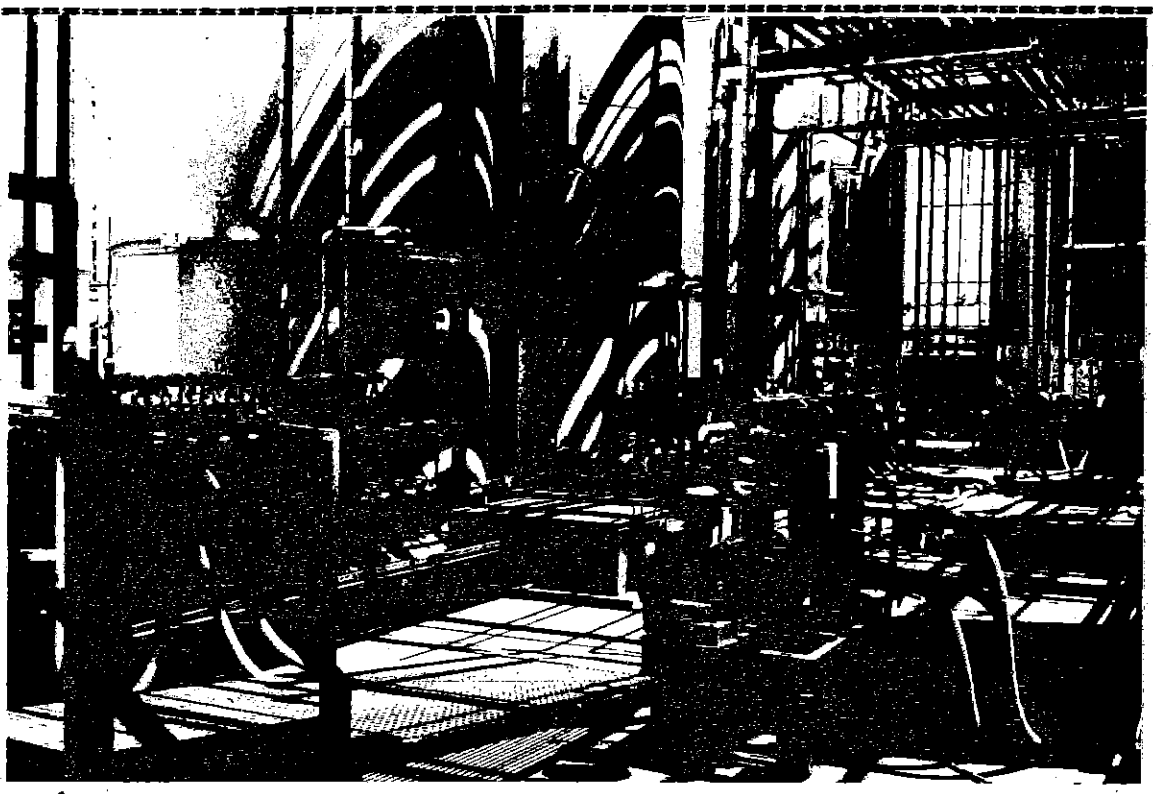


Comments: FACING EAST: SATELLITE ACCUMULATION AREA LOCATED INSIDE TRUCK STATION #1 Roll #: 93-7 Photo #: 8

Illinois Environmental Protection Agency Photographs

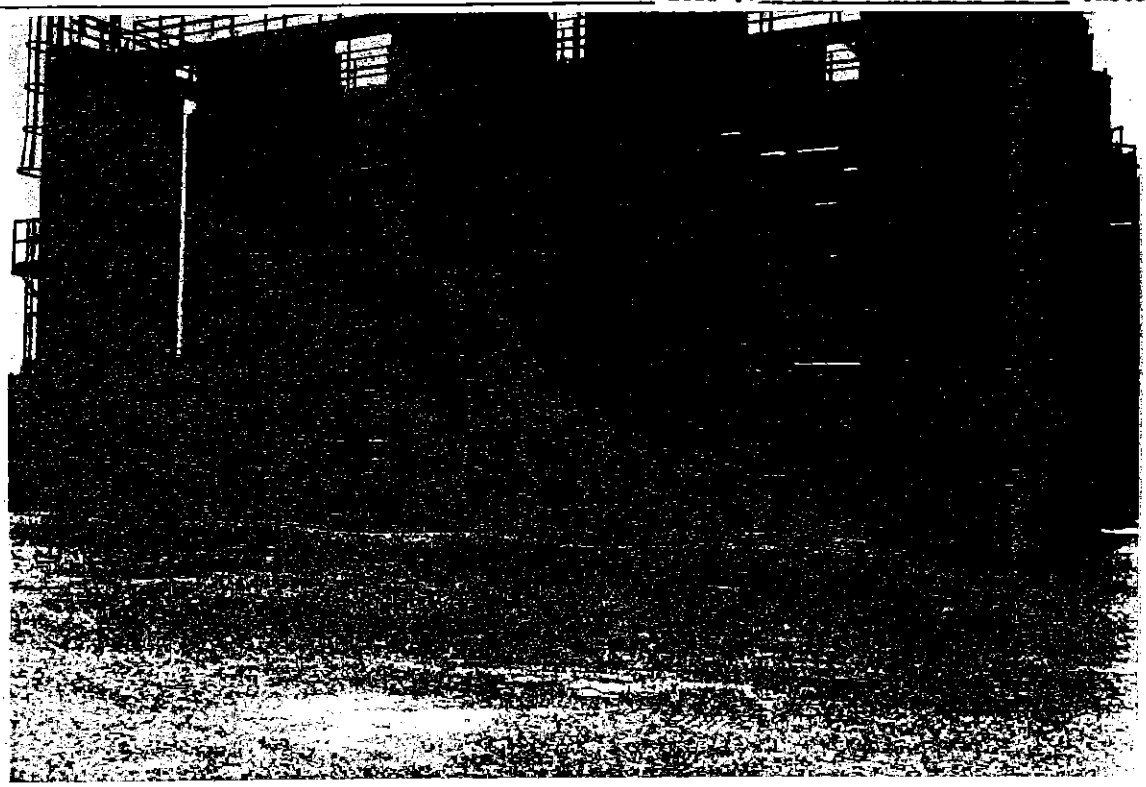
Site Name: SAFETY KLEEN CORP. CHICAGO RC IEPA #: 0316000053

: July 21, 1992 Time: 9:30A.M.- 1:15P.M. Photograph By: Anna VanOrden (AVO)



Comments: FACING NE: TANK FARM #5 PIPING PIT

Roll #: 93-7 Photo #: 9



Comments: FACING SE: TANK FARM #5

Roll #: 93-7 Photo #: 10

Illinois Environmental Protection Agency Photographs

Site Name: SAFETY KLEEN CORP. CHICAGO RC IEPA #: 0316000053

Date: July 21, 1992 Time: 9:30A.M.- 1:15P.M. Photograph By: Anna VanOrden (AVO)

Comments: FACING NW: TANK FARM # 1

Roll #: 93-7 Photo #: 11

Comments:

Roll #: 93-7 Photo #:

Area	Class	30 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 C: Authorization by Rule and Interim Status**				
OTH	1			**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 ✓				

RECEIVED
30 JUL 1992
IEPA/DLPC

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.
OTH	1			**Section 703.151: Application by New HWM Facilities**			✓	NOT A NEW FACILITY
				For a new HWM facility, has the facility complied with the requirements of this section? Specifically, has the facility submitted Part A and Part B of the permit application 180 days before physical construction has commenced? Yes ____ No ____ Is the facility only operating with a RCRA permit? Yes ____ No ____ **NOTE: This violation should be cited in the CIL only after receiving approval from headquarters.**				
OTH	1			**Section 703.152: Amended Part A Application**	✓			
				Has the owner or operator of a HWM facility with interim status filed an amended Part A permit application with the Agency: 1) No later than the effective date of revised regulations under 35 Ill. Adm. Code 721, Identification and Listing of Hazardous Waste, listing or identifying additional hazardous waste which the HWM facility is handling? Yes ✓ No ____ N/A ____ 2) As necessary to comply with the provisions of Section 703.155, Changes During Interim Status? Yes ✓ No ____ N/A ____ **NOTE: The owner or operator of a facility who fails to comply with the updating requirements of this section does not receive interim status as to the wastes not covered by duly filed Part A applications.**				

IL 532-1592

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
OTH	1			**Section 703.154: Prohibitions During Interim Status**	✓			
				During interim status, has the facility refrained from:				
			a	- Treating, storing or disposing of hazardous waste not specified in Part A of the permit application? Yes ✓ No ___				
			b	- Employing processes not specified in Part A of the permit application? Yes ✓ No ___				
			c	- Exceeding the design capacities specified in Part A of the permit application? Yes ✓ No ___				
OTH	1			**Section 703.155: Changes During Interim Status**	✓			
				NOTE: Section 703.155(a), (b) and (c) reiterate in more detail the requirement that a HWM facility submit and, in the case of (b) and (c) that the Agency approve, amendments to the Part A permit application prior to the facility conducting the activity or receiving new hazardous waste. A "No" answer to any of the questions under Section 703.154 means the facility is also in apparent non-compliance with this section.				
			d	Did the owner or operator submit a revised Part A permit application not later than 90 days prior to changes in operational control or ownership of the HWM facility? Yes ___ No ___ N/A ✓				NO CHANGE IN OPERATIONAL CONTROL OR OWNERSHIP

TL 532-1592
LBC 258 8/87

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No
				PART 722 **GENERATOR STANDARDS** **Subpart A: General**				
OTH	1			**Section 722.111: Hazardous Waste Determination**	✓			
				Has the generator determined if the solid waste it generates is a hazardous waste? Yes ✓ No ___				
				Did the generator follow the procedures specified in this section in making its determination? Yes ✓ No ___				
OTH	1			**Section 722.112: USEPA Identification Number**	✓			
			a	Has the generator obtained a USEPA identification number? Yes ✓ No ___				
			c	Has the generator offered his hazardous waste only to transporters or to treatment, storage or disposal facilities that have received a USEPA identification number? Yes ✓ No ___				

TI 532-1592

Area	Class	90 Day F U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No
				PART 722 **GENERATOR STANDARDS** **Subpart B: The Manifest**				
MAN	2			**Section 722.120: General Requirements**	✓			
			a	Has the generator who transports, or who offers its hazardous waste for transportation off-site for treatment, storage or disposal prepared a uniform hazardous waste manifest? Yes ✓ No ___				
				Note: If the generator has not used a manifest, check "No" in the Apparent Compliance Column and skip to 722.130.				
			b	Did the generator designate on the manifest one facility which is permitted to handle the hazardous waste therein described? Yes ✓ No ___				
				Note: The generator may also designate an alternate facility permitted to handle the hazardous waste in the event an emergency prevents delivery of the hazardous waste to the primary designated facility.				
			d	In any instances where the transporter was unable to deliver the hazardous waste to the designated or alternate permitted facility, has the generator designated another permitted facility or instructed the transporter to return the waste? Yes ✓ No ___				

TL 532-1592

Area	Class	90 Day F U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No
MAN	2			**Section 722.121: Acquisition of Manifests**	✓			
			a	Did the generator use the manifest supplied by the Agency for hazardous waste going for treatment, storage or disposal in Illinois? Yes ✓ No ___ N/A ___				
			b	For hazardous waste going outside Illinois for treatment, storage or disposal, has the generator used the manifest supplied by the Agency if the State to which the hazardous waste is being shipped does not supply and require the completion of its own State manifest? **or** For hazardous waste going outside Illinois for treatment, storage or disposal, has the generator used the manifest required by the State to which the hazardous waste is being shipped? Yes ✓ No ___ N/A ___				
MAN	2			**Section 722.122: Number of Copies**	✓			
				Does the manifest the generator is using consist of at least six copies (plus one copy for each additional transporter)?				
MAN	2			**Section 722.123: Use of the Manifest**	✓			
				For each manifest received, has the generator: 1) Signed the certificate by hand? Yes ✓ No ___ 2) Obtained the handwritten signature and the date of acceptance by the initial transporter? Yes ✓ No ___				

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
				3) Retained one copy as required by Section 722.140(a), Recordkeeping? Yes ✓ No ___				
				4) Apparently sent a copy (Part 5 for Illinois manifests) to the Agency within two working days? Yes ✓ No ___				
				NOTE: Obtain a copy of any manifest which is not in compliance with the requirements of this subsection. If copies are unobtainable, log manifest #s.				
			b	Has the generator apparently given the remaining copies of the manifest to the transporter? Yes ✓ No ___				
			c	Has the generator followed the procedures prescribed in Section 722.123(c) for manifesting bulk shipments of hazardous waste by water? Yes ___ No ___ N/A ✓				NO SHIPMENTS BY WATER OR RAIL
			d	Has the generator followed the procedures prescribed in Section 722.123(d) for manifesting bulk shipments of hazardous waste by rail? Yes ___ No ___ N/A ✓				

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No
				PART 722 **GENERATOR STANDARDS** **Subpart C: Pre-Transport Requirements**				NO WASTE READY FOR TRANSPORTATION OFF SITE
OTH	1	X		**Section 722.130: Packaging** Is waste which is ready for transportation off-site packaged in accordance with 49 CFR, Parts 173, 178 and 179?			✓	
OTH	1	X		**Section 722.131: Labeling** Is each package of hazardous waste which is ready for transportation off-site labeled in accordance with 49 CFR Part 172?			✓	
OTH	1	X		**Section 722.132: Marking**			✓	
			a	Is each package of hazardous waste which is ready for transportation off-site marked in accordance with 49 CFR Part 172? Yes ____ No ____				
			b	Is each package of hazardous waste which is ready for transportation off-site marked with: - The generator's name and address? Yes ____ No ____ - The manifest document number associated with the container? Yes ____ No ____ - The words "Hazardous Waste - Federal Law Prohibits Improper Disposal. If found contact the nearest police, or public safety authority or the U.S. Environmental Protection Agency"? Yes ____ No ____				

TI 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 722.133: Placarding** Does the generator have, for the waste it generates, the proper placards to: - Placard the transport vehicle, or - Offer to the first transporter, according to 49 CFR, Part 172, Subpart F? **NOTE: If the placards are provided by the transporter, then mark the N/A Column and use Comment field to explain.**			✓	TRANSPORTER SUPPLIES PLACARDS
OTH	1	X		**Section 722.134: Accumulation Time** **NOTE: If the TSD checklist will be completed and the facility only accumulates wastes for 90 days or less for Section 722.134 complete page GEN-C-2(a) then skip to TSD checklist.** **NOTE: A generator who is also a TSD would be subject to this section for any waste which is not identified for storage on the facility's Part A, or which is being accumulated outside a "permitted" storage area.**			✓	FACILITY HAS INTERIM STATUS FOR STORAGE OF HAZARDOUS WASTE SEE TSD CHECKLIST ↓
			a	**For waste in containers, has** the generator complied with the requirements of 35 Ill. Adm. Code 725, Subpart I: Use and Management of Containers listed below: **NOTE: If no wastes in containers, mark "N/A" and skip to Section 725.291 of the Generator checklist.**				

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No
OTH	1	X		**Section 722.134: Accumulation Time**			✓	SEE TSD CHECKLIST
				NOTE: A generator who is also a TSD would be subject to this section for any waste which is not identified for storage on the facility's Part A, or which is being accumulated outside a "permitted" storage area.				
			a1	For waste in containers, has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subpart I?				
				and/or				
				For waste in tanks, has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subpart J except Section 725.297(c) and 725.300? Yes ____ No ____				
			a2	For waste in containers, has the generator marked and made visible for inspection on each container, the date upon which accumulation began? Yes ____ No ____ N/A ____				
			a3	For waste in containers and tanks, has the generator marked or labeled each with the words "Hazardous Waste"? Yes ____ No ____				
			a4	Has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subparts C and D, and Section 725.116? Yes ____ No ____				

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
				SATELLITE ACCUMULATION				
			c1	Is the generator who accumulates hazardous waste in containers at or near any point of generation where wastes initially accumulate and which is under the control of the operator of the process generating the waste:				
				- Limiting such accumulation to 55 gallons (one quart of acutely hazardous waste listed in 35 Ill. Adm. Code 721.133)? Yes ✓ No ___ N/A ___				
				- Complying with the requirements of:				
				1) 35 Ill. Adm. Code 725.271, Condition of Containers? Yes ✓ No ___				
				2) 35 Ill. Adm. Code 725.272, Compatibility of Waste with Containers? Yes ✓ No ___				
				3) 35 Ill. Adm. Code 725.273(a), Management of Containers - requiring that the containers be stored closed except when waste is being added or removed? Yes ✓ No ___				
				- Marking the containers with the words "Hazardous Waste" or with words that identify the contents of the containers? Yes ✓ No ___				

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.
			c2	Has the generator who accumulates more than 55 gallons (one quart of acutely hazardous waste listed in 35 Ill. Adm. Code 721.133(e)) with respect to the amount of excess waste, complied with the requirements in Section 722.134(a) within three days? Yes ____ No ____ Are the containers with the excess amounts marked with the date accumulation began? Yes ____ No ____ During the three day period, is the generator continuing to comply with the requirements of Section 722.134(c)(1)? Yes ____ No ____				NO EXCESS ACCUMULATION

IL 532-1592
LPC 250 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 722 **GENERATOR STANDARDS** **Subpart D: Recordkeeping and Reporting**				
OTH	2			**Section 722.140: Recordkeeping**	✓			
				Has the generator retained for a period of three years:				
			a	- A copy of each signed manifest? Yes ✓ No ___				
			b	- A copy of each annual report? Yes ✓ No ___				
			b	- A copy of each exception report? Yes ___ No ___ N/A ✓				
			c	- Copies of test results, waste analyses or other determinations made in accordance with Section 722.111? Yes ✓ No ___ N/A ___				
			d	Does a generator who is involved in any unresolved enforcement action continue to maintain the records required in 722.140(a) thru (c)? Yes ___ No ___ N/A ✓				
			d	If the Director has requested that the records required in 722.140(a) thru (c) be maintained for a period longer than three years, has the generator continued to maintain them? Yes ___ No ___ N/A ✓				

IL 532-1502
LPC 258 8/87

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
OTH	2			**Section 722.141: Annual Reporting**	✓			
				Has the generator who ships waste off-site to a treatment, storage or disposal facility within the United States prepared and submittted a copy of an annual report, as supplied by the Agency, to the Agency by March 1 for the preceding calendar year?				
				NOTE: A generator who treats, stores or disposes of hazardous waste on-site must also submit an annual report as a TSD in accordance with the requirements of 35 Ill. Adm. Code 702, 703, 724, 725 and 40 CFR 266.				
MAN	1			**Section 722.142: Exception Reporting**			✓	NONE NECESSARY
			a	Has the generator who has not received a signed copy of the manifest from the designated TSD within 35 days of the date the waste was accepted by the initial transporter determined the status of its hazardous waste? Yes ____ No ____				
			b	Has the generator who has not received a signed copy of the manifest from the designated TSD within 45 days of the date the waste was accepted by the original transporter submitted an exception report to the Director? Yes ____ No ____				
			b	Does any exception report submitted to the Director contain the following:				
				- A legible copy of the manifest for which the generator does not have confirmation of delivery; and				

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.
OTH	1			- A cover letter signed by the generator or his authorized representative explaining the efforts taken to locate the hazardous waste and the results of those efforts? Yes ____ No ____ N/A ____				
				Section 722.143: Additional Reporting			✓	NONE REQUIRED
				Has the generator submitted all additional reports concerning quantities and disposition of wastes as required by the Director?				

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	1/2			**PART 722** **GENERATOR STANDARDS** **Subpart E: Exports of Hazardous Waste** **Section 722.152: General Requirements** Has the facility made any shipments of hazardous waste outside the United States? Yes ____ No ✓ **NOTE: If "No", skip Subpart E. If "Yes", answer the next question.** Has the generator complied with the requirements in Sections 722.152 through 722.157? Yes ____ No ____ **NOTE: If the answer is "No", explain in detail why the firm did not meet the requirements. Review the requirements prior to answering this question. When citing a violation of this Subpart, identify the specific section violated in the Narrative as well as in the Comments.**			✓	NO EXPORTS OF HAZARDOUS WASTE

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
MAN	1			**PART 722** **GENERATOR STANDARDS** **Subpart F: Imports of Hazardous Waste** **Section 722.160: Imports of Hazardous Waste**			✓	NO IMPORTS OF HAZARDOUS WASTE
			b1	Has the person importing hazardous waste met the manifest requirements of Section 722.120 except that: In place of the generator's name, address and USEPA identification number, the name and address of the foreign generator and the importer's name, address and USEPA identification number are used; **and**				
			b2	Has the importer or his agent signed the manifest in place of the generator; **and**				
			b2	Has the importer or his agent obtained the signature of the initial transporter? Yes ____ No ____ N/A ____				
			c	Is the person importing hazardous waste using manifests obtained from the Agency? Yes ____ No ____				

IL 532-1592
LPC 256 0/87

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	X		**PART 722** **GENERATOR STANDARDS** **Subpart G: Farmers** **Section 722.170: Farmers** Is a farmer who is disposing of waste pesticides from his own use which are hazardous wastes: - Triple rinsing each emptied pesticide container in accordance with 35 Ill. Adm. Code 727.107(b)(3), Residues of Hazardous Waste in Empty Containers? Yes ____ No ____ N/A ____ - Disposing of pesticide residue on his own farm in a manner consistent with the disposal instructions on the pesticide label? Yes ____ No ____ N/A ____ **NOTE: If the answer to either of the preceeding questions is "No", the farmer is subject to the requirements of this Part (722) and to the applicable portions of 35 Ill. Adm. Code 702, 703 and 725 (724). Complete the applicable inspection form(s).**			✓	NO FARMING ACTIVITY

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** **Subpart A: General Provisions**				
OTH	1			**Section 725.101: Purpose, Scope and Applicability**	✓			RECLAMATION
				Does the facility qualify for any of the exemptions under Section 725.101(c)? Yes ____ No ____				
				NOTE: If "Yes", explain in narrative.				
			d	Has the firm managed hazardous waste with the following hazardous waste numbers: F020, F021, F022, F023, F026 or F027 in compliance with the requirements of 725.101(d)? Yes ____ No ____ N/A ✓				THESE WASTES ARE NOT MANAGED BY THIS FACILITY

IL 532-1592
LPC 256 6/87

Area	Class	90 Day F U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No
				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 A FOREIGN SOURCE
			b	Before transferring ownership or operation of a facility during its operating life, or of a disposal facility during the post-closure care period, did the owner or operator notify the new owner or operator, in writing, of the requirements of 35 Ill. Adm. Code 703, 703 and 725? Yes ____ No ____ N/A ✓				NO TRANSFER OF OWNERSHIP OR OPERATIONS
OTH	1			**Section 725.113: General Waste Analysis**	✓			
			a1	Has the owner or operator of the facility obtained a detailed chemical analysis of each waste prior to its treatment, storage or disposal? Yes ✓ No ____				

IL 532-1592
LPC 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
			a1	Does the analysis contain all the information which must be known to treat, store or dispose of the waste in accordance with this Part? Yes ✓ No ____				
			a3	Has the analysis been repeated: A) When the operator is notified or has reason to believe that the process generating the hazardous waste has changed? Yes ✓ No ____ N/A ____ B) By off-site facilities, when the results of the inspection required in Section 725.113(a)(4) indicate that the hazardous waste received at the facility does not match the waste designated on the accompanying manifest or shipping paper? Yes ✓ No ____ N/A ____				
			a4	Has the owner or operator of an off-site facility apparently inspected each hazardous waste movement received at the facility to determine whether it matches the identity of the waste specified on the accompanying manifest or shipping paper? Yes ✓ No ____ N/A ____				
			b	Has the owner or operator developed a written analysis plan? Yes ✓ No ____ **NOTE: If "No", skip to 725.114.** Is the written waste analysis plan available at the facility? Yes ✓ No ____				

IL 532-1502
LPC 256 8/87

Area	Class	90 Day Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
				Does the owner or operator follow the procedures in the written plan so as to comply with the requirements in Section 725.113(a)? Yes ✓ No ____				
			b	Does the plan specify: 1) The parameters for which each hazardous waste will be analyzed and the rationale for the selection of these parameters? Yes ✓ No ____ 2) The test methods which will be used to test for those parameters? Yes ✓ No ____ 3) The sampling method which will be used to obtain a representative sample of the waste to be analyzed? Yes ✓ No ____ 4) The frequency with which the initial analysis of the waste will be reviewed or repeated to ensure that the analysis is accurate and up-to-date? Yes ✓ No ____ 5) For off-site facilities, the waste analyses that hazardous waste generators have agreed to supply? Yes ✓ No ____				

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
				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 ✓				

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
				Does a non-exempt facility have either:				
			b	1) A 24-hour surveillance system which continuously monitors and controls entry into the active portion of the facility? Yes ✓ No ___				FACILITY OPERATES 24 HOURS, SEVEN DAYS A WEEK
				OR				
			b	2) An artificial or natural barrier which completely surrounds the active portion of the facility and a means to control entry at all times thru the gate(s) or other entries to the active portion of the facility? Yes ✓ No ___				
			c	Does a non-exempt facility have a sign, legible from a distance of at least 25 feet, with the words "Danger - Unauthorized Personnel Keep Out" at each entrance to the active portion of the facility and at other locations in sufficient numbers to be seen from any approach to the active portion? Yes ✓ No ___				
				NOTE: Existing signs with legends other than the one above may be used if the legend on the sign indicates only authorized personnel are allowed to enter the active portion and that entry onto the active portion can be dangerous.				

IL 532-1592
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
OTH	2			**Section 725.115: General Inspection Requirements**	✓			
			a	Does the owner or operator inspect the facility for malfunctions, deterioration, operator errors and discharges which are causing or may lead to: 1) Release of hazardous waste or hazardous waste constituents to the environment; or a threat to human health? Yes ✓ No ___				
			a	Does the owner or operator conduct these inspections often enough to identify problems in time to correct them before they harm human health or the environment? Yes ✓ No ___				
			b1	Has the owner or operator developed a written schedule for inspecting all monitoring equipment, safety and emergency equipment, security devices and operating and structural equipment important to preventing, detecting or responding to environmental or human health hazards? Yes ✓ No ___				
			b2	Is the written schedule at the facility? Yes ✓ No ___				
			b3	Does the schedule identify the types of problems which are to be looked for during the inspection? Yes ✓ No ___				
			b4	Does the schedule specify at least the following minimum inspection frequency: - Daily inspections of areas subject to spills? Yes ✓ No ___				

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
				- 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 ___				
			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 ___				
			d	Does the inspection record include: - The date and time of the inspection? Yes ✓ No ___ - The name of the inspector? Yes ✓ No ___				

IL 532-1502
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.
				- A notation of the observations made? Yes ✓ No ____				
				- The date and nature of any type of corrective action? Yes ✓ No ____ N/A ____				
OTH	2			**Section 725.116: Personnel Training**	✓			
				Does the facility have a training program? Yes ✓ No ____				
				<u>NOTE</u>: If "No", skip to Section 725.117, Page TSD-B-10.				
			a1	Have facility personnel who are involved with hazardous waste management successfully completed a program of classroom or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the requirements of this Part? Yes ✓ No ____				
				Is the training program formalized, i.e., written down? Yes ✓ No ____				
			a2	Is the program directed by a person who has been trained in hazardous waste management procedures? Yes ✓ No ____				
			a3	Does the program cover, at a minimum:				
				A) Procedures for using, inspecting, repairing and replacing facility emergency and monitoring equipment? Yes ✓ No ____ N/A ____				

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
				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 ____				
				E) Response to ground water contamination incidents? Yes ✓ No ____ N/A ____				
				Does the program cover the implementation of the contingency plan? Yes ✓ No ____				
			b	Have new employees completed the program within six months of the date of employment or assignment to a position requiring them to manage hazardous waste? Yes ✓ No ____ N/A ____				
			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 ____				

IL 532-1592
LPC 256 6/87

Area	Class	90 Day F U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
				2) A written job description for each job position above, to include the requisite skill, education or other qualifications and duties of personnel assigned to each position? Yes ✓ No ____				
				3) A written description of the type and amount of both initial and continuing training that will be given to each person holding a position dealing with hazardous waste management? Yes ✓ No ____				
				4) Records to document that the training or job experience have been given to and completed by personnel dealing with hazardous waste management? Yes ✓ No ____				
			e	Is the facility maintaining training records of former employees who were involved in hazardous waste management for a period of at least three years? Yes ✓ No ____ N/A ____				
OTH	1	X		**Section 725.117: General Requirements for Ignitable, Reactive or Incompatible Wastes**	✓			
			a	Are ignitable and reactive wastes protected from and separated from sources of ignition and reaction? Yes ✓ No ____				
			a	Are smoking and open flames restricted to specially designated areas when ignitable or reactive waste is being handled? Yes ✓ No ____				

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.
			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 commingling of incompatible wastes and materials being done so that it does not: 1) Generate extreme heat or pressure, fire, or explosion or violent reaction? Yes ✓ No ___ 2) Produce uncontrolled toxic mists, fumes, dusts or gases in sufficient quantities to threaten human health? Yes ✓ No ___ 3) Produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosion? Yes ✓ No ___ 4) Damage the structural integrity of the device or facility containing the waste? Yes ✓ No ___ 5) Through other like means threaten human health or the environment? Yes ✓ No ___				

IL 532-1592
LPC 256 6/87

Area	Class	90 Day F U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
				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.**			✓	

IL 532-1502
LPC 250 6/87

Area	Class	90 Day F U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
				PART 725 **INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES** **Subpart C: Preparedness and Prevention**				
OTH	1	X		**Section 725.131: Maintenance and Operation of Facility**	✓			
				Is the facility being maintained and operated to minimize the possibility of a fire, explosion or any unplanned and sudden or non-sudden release of hazardous waste or hazardous waste constituents to: - Air; - Soil; or - Surface water, which would threaten human health or the environment? Yes ✓ No ____				
OTH	1	X		**Section 725.132: Required Equipment**	✓			
				Is the facility equipped with the following, unless none of the hazards posed by waste handled at the facility could require a particular kind of equipment:				
			a	- An internal communications or alarm system capable of providing immediate emergency instructions? Yes ✓ No ____ N/A ____				
			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 ____				

IL 532-1592
LPC 256 6/87

Area	Class	90 Day F U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
			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.**	✓			

IL 532-1502
LPC 258 8/87

Area	Class	90 Day F U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
OTH	1	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 ✓				THERE IS NEVER ONLY ONE EMPLOYEE ON THE PREMISES DURING OPERATING HOURS
OTH	1	X		**Section 725.135: Required Aisle Space**	✓			
				Is the owner or operator maintaining sufficient aisle space to allow the unobstructed movement of personnel, fire equipment and decontamination equipment to any area of the facility?				
OTH	2			**Section 725.137: Arrangements with Local Authorities**	✓			
			a	Has the owner or operator made or attempted to make the following arrangements as appropriate for the type of waste handled at his facility and the potential need for the services of these organizations:				

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.
				1) Arrangements to familiarize police and fire departments and emergency response teams with the layout of the facility, properties of hazardous wastes handled at the facility and associated hazards, places where personnel would normally be working, entrances to roads inside the facility and possible evacuation routes? Yes ✓ No ____ N/A ____				
				2) Where more than one police or fire department might respond to an emergency, has one been designated as the primary emergency authority with the others agreeing to provide support to the primary emergency authority? Yes ____ No ____ N/A ✓				CHICAGO POLICE AND FIRE DEPARTMENTS WOULD RESPOND
				3) **Agreements with State emergency response teams, emergency response contractors and equipment suppliers?** Yes ✓ No ____ N/A ____				
				4) Arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illnesses which could result from fires, explosions or releases at the facility? Yes ✓ No ____ N/A ____				
				NOTE: Any "N/A" answer must be explained in the Comments.				
			b	Has the owner or operator documented, in the operating record, refusal of State or local authorities to enter into any or all of the above arrangements? Yes ____ No ____ N/A ✓				NO REFUSALS

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.
				PART 725 **INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES** **Subpart D: Contingency Plan and Emergency Procedures**				
OTH	1			**Section 725.151: Purpose and Implementation of Contingency Plan**	✓			
			a	Is a plan available? Yes ✓ No ___				
				NOTE: If the answer is "No", skip to 725.155.				
			a	Is the plan designed to minimize hazards to human health or the environment from fires, explosions or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface waters? Yes ✓ No ___				
			b	Have the provisions of the plan been carried out immediately whenever there was a fire, explosion or release of hazardous waste constituents which could threaten human health or the environment? Yes ___ No ___ N/A ✓				NO SUCH INCIDENTS HAVE OCCURRED
OTH	2			**Section 725.152: Content of Contingency Plan**	✓			
			a	Does the plan describe the actions facility personnel must take to comply with Sections 725.151 and 725.156 in response to: 1) Fires? Yes ✓ No ___ 2) Explosions? Yes ✓ No ___				

IL 532-1502
LPC 256 0/87

Area	Class	90 Day F U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
				3) Unplanned sudden or non-sudden releases of hazardous waste or hazardous waste constituents to air, soil, or surface water? Yes ✓ No ___				
			c	Does the plan describe the arrangements agreed to by:				
				1) Local police and fire departments? Yes ✓ No ___				
				2) Hospitals? Yes ✓ No ___				
				3) Contractors? Yes ✓ No ___				
				4) State and local emergency response teams? Yes ✓ No ___				
			d	Does the plan list the names, addresses and phone numbers (office and home) of all personnel qualified to act as emergency coordinators? Yes ✓ No ___				
			d	Is the list of emergency coordinators up-to-date? Yes ✓ No ___				
			d	If more than one person is designated as an emergency coordinator is a primary coordinator designated? Yes ✓ No ___				
			e	Does the plan identify:				
				1) A list and physical description of all emergency equipment at the facility? Yes ✓ No ___				

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.
				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 532-1502
LPC 256 0/87

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 ____ N/A ✓				REGULATIONS HAVE NOT BEEN REVISED
			b	2) The plan fails in an emergency? Yes ____ No ____ N/A ✓				PLAN HAS NOT BEEN IMPLEMENTED
			c	3) The facility changes - in its design, construction, operation, maintenance or other circumstances - in a way that materially increases the potential for fires, explosions, or releases of hazardous waste or hazardous waste constituents or changes the response necessary in an emergency? Yes ✓ No ____ N/A ____				
			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**	✓			
				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 ✓ **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 0/87

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 ____ **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 532-1592
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.
			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.**				NO SHIPMENTS BY WATER OR RAIL
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 532-1592
LPC 258 6/87

Area	Class	90 Day F U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
OTH	2			**Section 725.173: Operating Record**	✓			
			a	Does the owner or operator have a written operating record at the facility? Yes ✓ No ___				
			b	Is the information in the operating record being maintained until closure of the facility? Yes ✓ No ___				
			b	Does the operating record contain the following information: 1) A description of and quantity of each hazardous waste received at the TSD facility (whether from on or off-site generation)? Yes ✓ No ___ 2) A record of the method(s) and date(s) of its treatment, storage, or disposal as required by Appendix I? Yes ✓ No ___ 3) The location of each hazardous waste within the facility? Yes ✓ No ___ 4) The quantity of each hazardous waste at each location within the facility? Yes ✓ No ___ 5) For disposal facilities, a map recording the location and quantity of hazardous waste in each cell or disposal area? Yes ___ No ___ N/A ✓				NOT A DISPOSAL FACILITY

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
				6) A cross reference by manifest number to location and quantity of hazardous waste? Yes ✓ No ____ N/A ____				
				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 Impound~~rovem~~ents)? Yes ____ No ____ N/A ✓				THESE MANAGEMENT METHODS ARE NOT EMPLOYED
				- 725.352 (Waste Piles)? Yes ____ No ____ N/A ✓				
				- 725.373 (Land Treatment)? Yes ____ No ____ N/A ✓				
				- 725.441 (Incinerators)? Yes ____ No ____ N/A ✓				
				- 725.475 (Thermal Treatment)? Yes ____ No ____ N/A ✓				
				- 725.502 (Chem., Phys., Bio. Treatment)? Yes ____ No ____ N/A ✓				
				8) Summary reports and details of all incidents that require the implementation of the contingency plan as specified in Section 725.156(j)? Yes ____ No ____ N/A ✓				NONE REQUIRED

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.
				9) Records and results of inspections as required by Section 725.115(d)? Yes ✓ No ____ **NOTE: The above information on inspection records need only be kept for three years. This period would automatically be extended during any unresolved enforcement action.**				
				10) Monitoring, testing or analytical data where required by Sections: - 725.190 (G.W. Monitoring)? Yes ____ No ____ N/A ✓ - 725.194 (G.W. Monitoring)? Yes ____ No ____ N/A ✓ - 725.376 (Land Treatment)? Yes ____ No ____ N/A ✓ - 725.378 (Land Treatment)? Yes ____ No ____ N/A ✓ - 735.380(d)(1) (Land Treatment)? Yes ____ No ____ N/A ✓ - 725.447 (Incinerators)? Yes ____ No ____ N/A ✓ - 725.477 (Thermal Treatment)? Yes ____ No ____ N/A ✓ **NOTE: Data required under 725.194 must be kept throughout the post-closure period.**				THESE DATA NOT REQUIRED

RECEIVED
30 JUL 1982
IEPA/DLPC

IL 532-1592
LPC 256 6/87

Area	Class	90 Day F U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
				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 ✓				NOT A DISPOSAL FACILITY
OTH	2			**Section 725.174: Availability, Retention and Disposition of Records**	✓			
			a	During the inspection, were all records including plans required under this Part furnished upon request and made available at all reasonable times for inspection as required by this Section? Yes ✓ No ____ N/A ____				
			c	Upon closure of a waste disposal facility did the owner or operator submit a copy of the record of waste disposal location(s) and quantities to:				NOT A DISPOSAL FACILITY
				- 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 ✓				NONE REQUIRED

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
OTH	2			**Section 725.175: Annual Report**	✓			
				Has the owner or operator prepared and submitted a copy of a facility annual report, supplied by the Agency, to the Agency by March 1 of each year for the preceding calendar year?				
OTH	1			**Section 725.176: Unmanifested Waste Report**			✓	
				Does the facility accept hazardous waste from off-site? Yes ✓ No ___				
				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 ✓				NO HAZARDOUS WASTE ACCEPTED WITHOUT MANIFESTS
				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 ___ N/A ✓				
				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 532-1592
LPC 258 6/87

Area	Class	90 Day F U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No
				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**			✓	NONE REQUIRED
				Has the owner or operator submitted to the Agency, as required, reports concerning:				
			a	1) Releases, fires, explosions as specified in Section 725.156? Yes ____ No ____ N/A ✓				
			b	2) Groundwater contamination and monitoring data as specified in Sections 725.193 and 725.194? Yes ____ No ____ N/A ✓				
			c	3) Facility closure as specified in Section 725.215? Yes ____ No ____ N/A ✓				

IL 532-1592
LPC 256 8/87

Area	Class	90 Day F-U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No
				PART 725 **INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES** **Subparts G and H: Closure, Post-Closure and Financial Requirements**				
CLO	1			**Section 725.212: Closure Plan**	✓			
			a	Was the most current facility closure plan available during the inspection? Yes ✓ No ____				
				Was the closure plan submitted to the Agency within the time frames specified below: - At least 180 days prior to the date closure of the first surface impoundment, waste pile, land treatment or landfill unit was (is) expected to begin? Yes ____ No ____ N/A ✓ - At least 180 days prior to the date of final closure of a facility with surface impoundment(s), waste pile(s), land treatment or landfill unit(s)? Yes ____ No ____ N/A ✓ - 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 532-1592
LPC 256 6/87

Area	Class	90 Day F U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No
				- 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**			✓	NOT A DISPOSAL FACILITY
			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**			✓	NOT A DISPOSAL FACILITY
				Has the facility prepared a written estimate of the annual cost of post-closure monitoring and maintenance of the facility?				
				NOTE: If no post-closure plan, mark "N/A".				

IL 532-1592
LPC 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** **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?				
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 a manner which will prevent the rupture of the container or prevent it from leaking? Yes ✓ No ___				
OTH	2			**Section 725.274: Inspections**	✓			
				Is the owner or operator inspecting areas where the containers are stored at least weekly, looking for leaks and for deterioration caused by corrosion or other factors? Yes ✓ No ___				

IL 532-1592
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.
				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?	✓			
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 WASTES

IL 532-1502
LPC 258 6/87

Area	Class	90 Day F U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
				PART 725 **INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES** **Subpart J: Tank Systems**				
				Section 725.290: Applicability				
				Does the facility store or treat hazardous waste in tanks? Yes ✓ No ____				
				If "No", skip Subpart J.				
				NOTE: Tanks or sump pits that serve as part of a secondary containment system to collect or contain releases are not subject to Subpart J requirements.				
				Will the waste stored in the tanks fail the filter test and are the tanks located inside a building with an impermeable floor? Yes ____ No ____ →				LIQUID WASTES STORED OUTSIDE IN ABOVE GROUND TANKS
				NOTE: Failing the filter test means that the waste contains free liquids.				
OTH	2			**Section 725.291: Assessment of Existing Tank Systems**	✓			TANK FARM #4
			a	For tanks not protected by a secondary containment system, is an independent, certified written assessment available? Yes ✓ No ____				
				NOTE: Except as provided in Subsection (c) of 725.291, certified assessment must be available by 1/12/88.				

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
			b	Does this assessment consider at least the following: 1) available standards for the tank and ancillary equipment; 2) hazardous characteristics of the wastes; 3) existing corrosion protection measures; 4) age of the tank system; and 5) results of a leak test, internal inspection, or other tank integrity examination? Yes ✓ No ___				
OTH	1			**Section 725.292: Design and Installation of New Tank Systems or Components**	✓			TANK FARM #5
			a	For new tanks (built after July 14, 1986) was an independent, certified written assessment prepared? Yes ✓ No ___ Does the assessment include, at a minimum, the following: 1) design standards for tanks and ancillary equipment; **NOTE: These standards should include protection from damage from vehicular traffic, adequate foundations, anchoring to prevent flotation or dislodgement, and withstanding the effects of frost heave.** 2) hazardous characteristics of the waste; and 3) evaluation of potential for corrosion and corrosion protection measures? 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.
			g	Has the owner obtained and kept on file at the facility the certifications of the design and installation requirements of Subsections (b) through (f)? Yes ✓ No ___				
OTH				**Section 725.293: Containment and Detection of Releases**	✓			
			a1	Is secondary containment provided for any new tank system (constructed after 7/14/86) before being put into service? Yes ✓ No ___ N/A ___				
			a2	Does an existing tank, which stores F020, F021, F022, F023, F026 or F027 waste(s) have secondary containment (secondary containment is required by January 12, 1989)? Yes ___ No ___ N/A ✓				THESE WASTES ARE NOT STORED AT THIS FACILITY
			a3	For an existing tank, of known age, which stores any hazardous waste, is secondary containment provided (secondary containment is required by January 12, 1989 or when the tank is 15 years old, whichever is later)? Yes ✓ No ___ N/A ___				
			a4	For an existing tank of unknown age, has secondary containment been provided by January 12, 1995? Yes ___ No ___ N/A ✓ **or** If the facility is older than 7 years, by the time the facility reaches 15 years of age or January 12, 1989, whichever is later? Yes ___ No ___ N/A ✓				
			a5	For tanks that store wastes that are listed as hazardous after 1/12/87, has secondary containment been provided on the same basis as required in Subsections (a)(1) through (a)(4) of 725.293 substituting the date that a material becomes a hazardous waste for 1/12/87? Yes ___ No ___ N/A ✓				

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
			b1&2	Is the secondary containment system designed, installed and operated to prevent migration of wastes out of the system, and capable of detecting and collecting releases? Yes ✓ No ____ N/A ____ **NOTE: To meet the requirements of Subsection (b) secondary containment must comply with the physical requirements given in Subsection (c)(1) through (4) (compatible liner, foundation, leak detection system).**				
			c4	Is spilled or leaked wastes and accumulated precipitation removed from the secondary containment within 24 hours? Yes ✓ No ____ N/A ____ **NOTE: A RCRA permit may allow for removal of liquids less frequently than 24 hours after accumulation.**				
			d	Does the secondary containment have one or more of the following: 1) a liner (external to the tank); or *2) a vault; or 3) a double-walled tank; or 4) an equivalent device (approved by the Board)? Yes ✓ No ____ N/A ____ **NOTE: Liners, vaults or double-walled tanks must also comply with the requirements of Section 725.293, Subsection (e) or "No" should be marked and explained in the comment.**				
			f	Is ancillary equipment protected by secondary containment that meets the requirement of Subsections (h) and (c) except for:				

IL 532-1502
LPC 258 6/87

Area	Class	90 Day F U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No
				1) above ground piping (exclusive of flanges, joints, valves and connections) that are inspected daily;				
				2) welded flanges, joints and connections that are inspected daily;				
				3) sealless or magnetic coupling pumps that are inspected daily; and				
				4) pressurized above ground piping systems with automatic shut-off devices that are inspected daily? Yes ✓ No ____ N/A ____				
			i	Until such time as secondary containment is provided, are the following requirements being met for all tank systems:				
				1) For non-enterable underground tanks, has a yearly leak test that meets the requirements of 725.291(b) been conducted? Yes ____ No ____ N/A ✓				NO UNDER GROUND TANKS
				2) For enterable underground tanks and ancillary equipment, has a yearly leak test or an internal inspection or other tank integrity examination by an independent registered professional engineer been conducted? Yes ____ No ____ N/A ✓				
				3) Are written records maintained at the facility to document the assessments required under Subsections (i)(1) and (2)? Yes ____ No ____ N/A ✓				

IL 532-1592
LPC 250 0/87

Area	Class	90 Day F U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
OTH	1	X		**Section 725.294: General Operating Requirements**	✓			
			b1&2	Are tanks equipped with spill prevention controls (e.g., check valves, dry disconnect couplings) and overfill prevention controls (e.g., level sensing devices, high level alarms, automatic feed cutoff or bypass to a standby tank)? Yes ✓ No ___				
			b3	Is a sufficient freeboard being maintained in uncovered tanks to prevent overtopping by wave or wind action or by precipitation? Yes ___ No ___ N/A ✓				NO UNCOVERED TANKS
			c	If a leak or spill has occurred in the tank system, has the owner or operator complied with the requirements of 725.296? Yes ___ No ___ N/A ✓				NO LEAKS OR SPILLS
OTH	2			**Section 725.295: Inspections**	✓			
			c	Is the facility operator inspecting and documenting, in an operating record, the results of tank inspection as required in 725.295, Subsections (a) and (b)? Yes ✓ No ___				
OTH	1	X		**Section 725.296: Response to Leaks or Spills and Disposition of Tank Systems**			✓	NO LEAKS OR SPILLS
				Does the facility have a tank system or secondary containment system from which there has been a leak or spill, or which is unfit for use? Yes ___ No ✓				
				NOTE: If "No", skip to Section 725.297. If "Yes", answer the following questions. If there is a violation of the requirements in this section, there is also a violation of Section 725.294(c).				

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.
				If a tank or secondary containment system has leaked, has the owner done the following:				
			a	1) Ceased using, stopped inflow of wastes? Yes ____ No ____				
			b	2) Removed the waste from the tank system within 24 hours and/or from the secondary containment system within 24 hours? Yes ____ No ____				
				3) Taken actions to prevent waste migration and removed and properly disposed of visibly contaminated soil or subsurface water? Yes ____ No ____				
			d	4) Reported to the Agency within 24 hours of detection? Yes ____ No ____				
				NOTE: Reporting to the Agency is not necessary if less than one pound of material which was immediately contained and cleaned up was spilled.				
				5) Within 30 days of detection of a release, submitted a report to the Agency that complies with Section 725.296(d)(3)(A) through (E)? Yes ____ No ____				
			e4	If the source of the release was from a component of a tank system without secondary containment, has the owner provided secondary containment (that satisfies 725.293) to the component of the system before it is returned to service? Yes ____ No ____ N/A ____				
				NOTE: If the component is above ground and can be visually inspected then secondary containment is not needed.				

IL 532-1592
LPC 258 6/87

Area	Class	90 Day F U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
			f	Certification of major repairs. If an extensive repair has been done, then is a certification by an independent, registered professional engineer, that the repaired system is capable of handling hazardous waste available before the tank is returned to service? Yes ____ No ____ N/A ____ Has the certification been submitted within 7 days after returning the tank system to use? Yes ____ No ____ N/A ____				
CLO	1			**Section 725.297: Closure and Post Closure Care** **NOTE: The requirements of this section apply to closure of tank systems. If no closure is being performed, then skip to Section 725.298.**	✓			FACILITY CURRENTLY GOING THROUGH CLOSURE (T190-T193)
			a	At the time of closure, has the owner removed or decontaminated all waste residues, contaminated components, contaminated soils and structures and equipment and managed them as hazardous waste (unless 721.103(d) applies)? Yes ____ No ____				TANKS HAVE BEEN DECONTAMINATED AND REMOVED
			a	Has the closure plan, closure activities, cost estimates for closure and financial responsiblity for tank systems met all requirements specified in Subparts G and H? Yes ____ No ____				
			b	If contaminated soils are not removed, then has the tank system performed closure and post closure care in accordance with requirements applicable to landfills (Section 725.410)? Yes ____ No ____ **NOTE: Such a tank system is considered a "Landfill" and shall meet all of the requirements of landfills specified in Subparts G and H.**				

IL 532-1582
LPC 256 8/87

Area	Class	90 Day F.U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
OTH	1			**Section 725.298: Special Requirements for Ignitable or Reactive Wastes**	✓			
				Are ignitable or reactive wastes stored in tanks? Yes ✓ No ___				
				NOTE: If "No", skip to Section 725.299.				
			a	If ignitable or reactive wastes are stored or treated in tanks, then is it in such a way that the waste is protected from material or conditions that may cause it to ignite or react? Yes ✓ No ___				
				NOTE: Tank systems used solely for emergencies may store ignitable/reactive wastes.				
			b	Are there proper protective distances between the waste management area and the facility boundary line? Yes ✓ No ___				
OTH	1			**Section 725.299: Special Requirements for Incompatible Wastes**			✓	NO INCOMPATIBLE WASTES
				Is Section 725.117 being complied with whenever incompatible wastes are stored in the same tank system or in a tank system which has not been decontaminated? Yes ___ No ___ N/A ✓				

RECEIVED
30 JUL 1992
IEPA/DLPC

IL 532-1582
LPC 256 6/87

Area	Class	90 Day F U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
OTH	1			**Section 725.300: Waste Analysis and Trial Tests**			✓	NO SIGNIFICANTLY DIFFERENT WASTES ARE STORED IN TANKS
				In addition to complying with 725.113, whenever a tank is used to treat chemically or to store a hazardous waste that is substantially different than that waste previously stored, or to treat chemically a hazardous waste with a substantially different process, then has the owner:				
			a	1) Conducted a waste analysis and trial treatment or storage tests? Yes ____ No ____ N/A ____				
				or				
			b	2) Obtained written, documented information to show that the proposed treatment or storage will meet the requirements of 725.294(a)? Yes ____ No ____ N/A ____				
				NOTE: Section 725.301: Generators of 100 to 1000 kg/mo. is included in the checklist for Reduced Requirement Generators.				

IL 532-1592
LPC 256 8/87

Area	Class	90 Day F U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No
				PART 726 **STANDARDS FOR THE MANAGEMENT OF SPECIFIC HAZARDOUS WASTE AND SPECIAL TYPES OF HAZARDOUS WASTE MANAGEMENT FACILITIES** **Subpart D: Hazardous Waste Burned for Energy Recovery** **NOTE: Facilities that burn hazardous waste for energy recovery (excluding Subpart O incinerators) are subject to this subpart. However, used oil which has a hazardous characteristic is not regulated under Subpart D, but rather Subpart E. Materials identified in 721.104 and 721.106(a)(3)(E) through (I), and hazardous waste subject to 721.105 (SQG) are exempt from this subpart.**				
OTH		X		**Section 726.132: Standards Applicable to Generators of Hazardous Waste Fuel**	✓			
	I		a	Is the generator in compliance with 722 requirements (complete and attach the GEN or RR GEN checklist)? Yes ✓ No ___ N/A ___				
OTH				**Section 726.133: Standards Applicable to Transporters of Hazardous Waste Fuel**			✓	NOT A TRANSPORTER
	I			Is the transporter in compliance with 723 requirements (complete and attach the TR checklist)? Yes ___ No ___ N/A ✓				
OTH		X		**Section 726.134: Standards Applicable to Marketers of Hazardous Waste Fuel**	✓			
OTH	II		a	Is the marketer marketing hazardous waste fuel only to persons who have notified USEPA of their hazardous waste fuel activities and have obtained a USEPA identification number? Yes ✓ No ___ N/A ___				
				and				

Area	Class	90 Day F U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No
				If the fuel is burned, only to persons who burn the fuel in boilers or industrial furnaces identified in 726.131(b)? Yes ✓ No ___ N/A ___				CEMENT KILNS
	II		b	Has the marketer notified USEPA of its hazardous waste fuel activities (even if the marketer has previously notified USEPA of its other hazardous waste activities and has obtained a USEPA identification number)? Yes ✓ No ___ N/A ___				
	I		c	Is the marketer in compliance with 702, 703, 722.134, 724 Subparts A through L, and 725 Subparts A through L (complete and attach the necessary checklist(s) PER, TSD, etc.)? Yes ✓ No ___ N/A ___				
	I		d	For off-site shipments, is the marketer in compliance with 722 (complete and attach the GEN checklist)? Yes ✓ No ___ N/A ___				
	II		e	Required Notices. Has the marketer obtained a notice from the receiver of the hazardous waste fuel (a burner or subsequent marketer) that they have: notified USEPA (3010 RCRA), re-notified USEPA of waste-as-fuel activity, and if the waste fuel is to be burned, that it is burned only in an industrial furnace or boiler per 726.131(b). Yes ✓ No ___ N/A ___				
	II		e	Before accepting hazardous waste fuel, has the receiver (buyer) provided notices to the seller as outlined in the previous question? Yes ✓ No ___ N/A ___				
	II		f	Has the marketer kept a copy of each certification, sent or received, for three years? Yes ✓ No ___ N/A ___				

Area	Class	90 Day F U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No
OTH				**Section 726.135: Standards Applicable to Burners of Hazardous Waste Fuel**			✓	FACILITY DOES NOT BURN HAZARDOUS WASTE FUEL
	I		a	Is the owner of an industrial furnace or boiler complying with the prohibitions in Section 726.131(b)? Yes ___ No ___ N/A ___				
	II		b	Has the USEPA been re-notified as to the burner's hazardous waste fuel activities? Yes ___ No ___ N/A ___				
	I		c	Does the burner accumulate/store hazardous waste fuel for a time period exceeding 90 days? Yes ___ No ___				
				NOTE: If "Yes", then the facility is subject to 702, 703, and 725 A through L (or 724 A through L for new facilities) and the appropriate checklist(s) must be completed. If "No", the facility must comply with 722.134 Accumulation Time.				
	I		c	Is the facility in compliance with 722.134? Yes ___ No ___ N/A ___				
	II		d	Prior to receiving the first shipment of hazardous waste fuel from a marketer, has the owner or operator of the industrial furnace or boiler provided the certification required in Sec. 726.135(d)? Yes ___ No ___ N/A ___				
	II		e	Has the burner kept a copy, for three years, of each certification notice that was sent to the marketers? Yes ___ No ___ N/A ___				

RCRA LAND DISPOSAL RESTRICTIONS INSPECTION

I. General Information

Facility: SAFETY-KLEEN CORP. CHICAGO RC

U.S. EPA ID No.: ILD 005450697 03160000053

Street: 1445 WEST 42ND STREET

City: CHICAGO State: IL Zip: 60609

Telephone: (312) 247-2828

Inspection Date: 7/21/92 Time: 9:30am-1:15 (am/pm)

Weather Conditions: 70°

	Name	Agency/Title	Telephone
Inspectors:	DONNA CZECH	IEPA/EPS	(708) 531-5900
	ANNA VAN ORDEN	IEPA/LSCT	(708) 531-5900
Facility Representatives:	ALFRED AGHAIEPOUR	FACILITY MGR.	(312) 247-2828
	TED ZAJACK	OPERATIONS MGR.	(312) 247-2828

See Appendix B to determine which of the following LDR waste categories the facility manages:

	Generate	Transport	Treat	Store	Dispose
F001-F005 Solvents	✓		✓	✓	
F020-F023 and F026-F028					
California List*	✓		✓	✓	
First Third [40 CFR 268.10]					
Second Third [40 CFR 268.11]					
Third Third [40 CFR 268.12]	✓		✓	✓	

* See Appendix A

INSPECTION SUMMARY

Processes That Generate LDR Wastes:

DISTILLATION UNIT
FRACTIONATION UNITS
LIQUID-LIQUID EXTRACTION UNITS
WASTEWATER TREATMENT UNIT
FILTERING

TREATMENT RESIDUALS ARE PUT BACK INTO THE SOLVENT RECOVERY PROCESS IF POSSIBLE. EVENTUALLY THESE RESIDUALS ARE SENT OFF SITE FOR TREATMENT OR INCINERATION.

LDR Waste Management:

WASTE STREAMS (GENERALLY SPENT SOLVENTS) FROM OFF-SITE FACILITIES ARE STORED IN TANKS AND IN CONTAINERS.

WASTE STREAMS GENERATED ON SITE ARE ALSO STORED IN TANKS AND IN CONTAINERS.

ALL WASTES GENERATED ON SITE ARE EVENTUALLY SHIPPED OFF SITE FOR TREATMENT OR INCINERATION.

Summary:

AT THE TIME OF THE INSPECTION, NO APPARENT VIOLATIONS OF THE LAND DISPOSAL RESTRICTION REGULATIONS WERE OBSERVED.

Signature: Donna J. Czech

RCRA LAND DISPOSAL RESTRICTIONS INSPECTION

II. WASTE IDENTIFICATION

A. List waste codes which the facility handles in each of the following LDR categories*:

1. F001 through F005 spent solvents:
   F001, F002, F003, F005

2. F020-F023 and F026-F028 dioxin-containing wastes:
   _____

3. California List Wastes (See Appendix A):
   SPENT SOLVENTS

4. First Third Wastes [40 CFR 268.10]:
   _____

5. Second Third Wastes [40 CFR 268.11]:
   _____

6. Third Third Wastes [40 CFR 268.12]**:
   D001

*See Appendix B.
** Note: Effective 09/25/90, large quantity generators and TSDs are required to use the toxicity characteristic leaching procedure (TCLP) instead of the extraction procedure (EP) for determining the toxicity characteristic (TC). Small quantity generators must comply with this new requirement by 03/29/91. Wastes which exhibit TC, but do not exhibit EP, will be considered "newly identified" wastes. They will be regulated under 40 CFR Part 268 only after they are evaluated by U.S. EPA, even if they are characteristic for a constituent previously covered under the EP toxicity characteristic (55 FR 22531).

B. Waste Code Determination

1. Have all wastes been correctly identified for purposes of compliance with 40 CFR Part 268?*

   Yes ✓ No___

   If no, list below:

Assigned Classification	Correct Classification
_____	_____
_____	_____
_____	_____
_____	_____

*Areas of concern include: California List/waste categories with more stringent treatment standards; listed/characteristic; multi-source/single-source leachate; P and U waste codes/F and K wastes; and waste code carry through principle.

Comments: _____

2. Have both the listed and characteristic waste code been assigned, where a listed waste exhibits a characteristic? [40 CFR 268.9(a)]

Yes ✓ No ___ NA ___

Comments ___

3. Has multi-source leachate been assigned the F039 waste code?* [40 CFR 261.31]

Yes ___ No ___ NA ✓

*Leachate derived exclusively from F020-F023 and/or F026-F028 dioxin wastes retains the individual waste codes.

If yes, was single-source leachate combined to form multi-source leachate? [55 FR 22623]

Yes ___ No ___

Comments ___

C. Does the facility handle the following wastes (national capacity variances)?

1. F001-F005 contaminated soil and debris resulting from a CERCLA response action or a RCRA corrective action (expires - 11/08/90). [40 CFR 268.30(c)]

Yes ___ No ✓ List ___

2. Dioxin contaminated soil and debris resulting from a CERCLA response action or a RCRA corrective action (expires - 11/08/90). [40 CFR 268.31(b)]

Yes ___ No ✓ List ___

3. California list contaminated soil and debris resulting from a CERCLA response action or a RCRA corrective action (expires - 11/08/90). [40 CFR 268.32(d)(2)]

Yes ___ No ✓ List ___

4. K048-K052 petroleum wastes (nonwastewaters; expires - 11/08/90). [40 CFR 268.35 (b)]

Yes ___ No ✓ List ___

5. Soil and debris contaminated with wastes that had treatment standards based on incineration set in the Second Third rule - F010, F024, K009, K010, K011, K013, K014, K023, K027, K028, K029, K038, K039, K040, K043, K093, K094, K095, K096, K113, K114, K115, K116, P039, P040, P041, P043, P044, P062, P071, P085, P089, P094, P097, P109, P111, U028, U058, U069, U087, U088, U102, U107, U190, U221, U223, U235 (expires - 06/08/91). [40 CFR 268.34(d)]

Yes ___ No ✓ List ___

6. Soil and debris contaminated with wastes that had treatment standards set in the Third Third rule based on incineration, mercury retorting, or vitrification. See Appendix A; (expires - 05/08/92). [40 CFR 268.35(e)]

Yes ___ No ✓ List _____

7. The following nonwastewaters - F039, K031, K084, K101, K102, K106, P010, P011, P012, P036, P038, P065, P087, P092, U136, U151. (expires -05/08/92). [40 CFR 268.35(c)]

Yes ___ No ✓ List _____

8. The following wastes identified as hazardous based on a characteristic alone: D004 (nonwastewaters), D008 (lead materials stored before secondary smelting), D009 (nonwastewaters) (expires - 05/08/92). [40 CFR 268.35(c)]

Yes ___ No ✓ List _____

9. Inorganic solid debris as defined in 40 CFR 268.2(g)*; includes chromium refactory bricks carrying EPA Hazardous Waste Nos. K048-K052 (expires - 05/08/92). [40 CFR 268.35(c)]

Yes ___ No ✓ List _____

*Note: Incorrect reference [40 CFR 268.2(a)(7)] in Third Third rule.

10. RCRA hazardous wastes that contain naturally occurring radioactive materials (expires - 05/08/92). [40 CFR 268.35(c)]

Yes ___ No ✓ List _____

11. Wastes listed in 40 CFR 268.10, 268.11, and 268.12 that are mixed radioactive/hazardous wastes (expires - 05/08/92)*. [40 CFR 268.35(d)]

Yes ___ No ✓ List _____

*Note: 40 CFR 268.10 and 268.11 wastes incorrectly omitted from this variance in the Third Third rule.

RCRA LAND DISPOSAL RESTRICTION INSPECTION

III. GENERATOR REQUIREMENTS

A. Treatability Group/Treatment Standard Identification*

*Note: This information is generally available on LDR notifications. If not, waste profile data and other documentation should be checked.

1. F001-F005 Spent Solvent Wastes: Does the generator correctly determine the appropriate treatability group/treatment standard for each F-solvent?

Yes ✓ No ___ NA ___

If available, list each waste code and check the correct treatability group.

Waste Code	Wastewater*	Nonwastewater
F001	___	✓
F002	___	✓
F003	___	✓
F005	___	✓

*Less than 1% by weight total organic carbon (TOC), or less than 1% by weight total F001-F005 solvent constituents listed in 40 CFR 268.41, Table CCWE. [40 CFR 268.2(f)(1)]

Comments _____

2. F020-F023 and F026-F028 Dioxin Wastes: Does the generator correctly determine the appropriate treatability group/treatment standard for each dioxin waste?

Yes ___ No ___ NA ✓

If yes, list each waste code and check the correct treatability group.

Waste Code	Wastewater*	Nonwastewater
___	___	___
___	___	___
___	___	___

Comments _____

*Less than 1% TOC by weight and less than 1% total suspended solids (TSS) by weight. [40 CFR 268.2(f)]

3. First, Second, and Third Third Wastes:

a. Does the generator correctly determine the appropriate treatability group/treatment standard for each waste?

Yes ✓ No ___ NA ___

If available, list each waste code and check the correct treatability group:

Waste Code	Subcategory	Wastewater*	Nonwastewater
D001			

* Less than 1% TOC by weight and less than 1% total suspended solids (TSS) with the following exceptions: K011, K013, and K014 wastewaters - less than 5% by weight TOC and less than 1% by weight TSS; K103 and K104 wastewaters - less than 4% by weight TOC and less than 1% by weight TSS. [40 CFR 268.2(f)(2) and (3)]

Comments_____

b. Do the assigned treatment standards for listed wastes cover constituents that may cause the waste to exhibit any characteristics? [40 CFR 268.9 (b)]

Yes ✓ No __ NA __

c. Does the generator specify alternative treatment standards for lab packs?*

Yes __ No __ NA ✓

*Use of the alternative treatment standards is not required. [55 FR 22629]

If yes, do lab packs only contain the following wastes?* [40 CFR 268.42(c)(2)]

__ Organometallics: 40 Part 268, Appendix IV constituents
__ Organics: 40 CFR Part 268, Appendix V constituents

*Unregulated wastes and hazardous wastes which meet treatment standards may be commingled in the appropriate Appendix IV and V lab pack. [55 FR 22629]

d. Does the generator specify alternative treatment standards for F039 multi-source leachate?*

Yes __ No __ NA ✓

*Use of the alternative treatment standards is required. [55 FR 22619]

4. California List Wastes: Has the generator correctly identified the treatability group and treatment standard/prohibition level for the following wastes? [55 FR 22675]

a. Liquid hazardous wastes containing PCBs ≥50 ppm

Yes __ No __ NA ✓

If yes, check the appropriate treatability group:

__ 50 to 500 ppm PCBs
__ ≥500 ppm PCBs

b. Listed or characteristic wastes containing ≥1,000 mg/l (liquids) or mg/kg (non-liquids) HOCs, which are not listed or characterized by the HOC content

Yes ___ No ___ NA ✓

If yes, check the appropriate treatability group:

___ Dilute HOC wastewater (1,000 mg/l to 10,000 mg/l HOCs)
___ All other HOCs greater than or equal to the prohibition level of 1,000 mg/l (liquids) or mg/kg (non-liquids)

c. Liquid hazardous wastes that exhibit a characteristic and also contain ≥ 134 mg/l nickel and/or ≥130 mg/l thallium

Yes ___ No ___ NA ✓

5. National Capacity Variance Wastes: Have all applicable California List prohibitions been identified for wastes covered under national capacity variances? (See Appendix A.)

Yes ___ No ___ NA ✓

If a wastestream contains a mixture of wastes, and a variance only applies to some of the waste codes, has the generator identified all applicable treatment standards and California List prohibitions? (See Appendix A.)

Yes ___ No ___ NA ✓

If California List prohibitions apply to wastestreams managed by the generator, complete the following table for each waste code, noting the date on which relevant national capacity variances expire.

Waste Code	Cal List Applicability	Expiration Date
___	_____	__/__/__
___	_____	__/__/__
___	_____	__/__/__

Comments_____

6. Treatment standards expressed as required technologies: Has the generator specified an alternative method to that required in 40 CFR 268.42?

Yes ___ No ✓ NA ___

If yes, list the waste code, the technology specified in 40 CFR 268.42, the alternative method, and documentation of approval. [40 CFR 268.42(b)]

Waste Code	Required Technology	Alternative Method	Approval
___	_____	_____	_____
___	_____	_____	_____
___	_____	_____	_____

Comments_____

7. Does the generator mix restricted wastes with different treatment standards for a constituent of concern?

Yes ___ No ✓

If yes, did the generator select the most stringent treatment standards? [40 CFR 268.41(b) and 268.43(b)]

Yes ___ No ___

Comments _____

B. **Waste Analysis**

1. Does the generator determine whether restricted wastes exceed treatment standards/prohibition levels at the point of generation?* [268.7(a)]

Yes ✓ No ___

*Note: This determination may be made at the point of disposal if the waste only has a prohibition level in effect.

If no, does the generator ship all restricted wastes as not meeting treatment standards?

Yes ___ No ___

Comments _____

2. Which of the following analytical methods does the generator employ?*

*Note: A "No" answer to applicable questions b. through d. does not necessarily constitute a violation. However, knowledge of waste is rarely adequate if a generator certifies that treatment standard criteria have been met.

a. Knowledge of waste:

Yes ✓ No ___

If yes, list the wastes for which applied knowledge was used and describe the basis of determination. Attach documentation. [40 CFR 268.7(a)(5)]
ALL SHIPMENTS ARE ANALYZED ON SITE; GC, PCBs, SPECIFIC GRAVITY, pH, % WATER, etc.

b. TCLP*: Are wastes with treatment standards specified in 40 CFR 268.41 analyzed using TCLP?** (BDAT*** = stabilization/immobilization technology)

Yes ___ No ___ NA ✓

*TCLP = Toxicity Characteristic Leaching Procedure (40 CFR Part 268, Appendix I, EPA Test Method 1311)
**See Appendix C for exceptions.
***BDAT = best demonstrated available technology. See Appendix A.

If yes, list the wastes for which TCLP was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results. [40 CFR 268.7(a)(5)]

_____

_____

c. Total constituent analysis: Are wastes with treatment standards specified in 268.43 analyzed using total constituent analysis?* (BDAT = destruction/removal technology)

Yes ___ No ___ NA ✓

*See Appendix C for exceptions.

If yes, list the wastes for which total constituent analysis was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results. [40 CFR 268.7(a)(5)]

_____

_____

d. PFLT*: Was PFLT used to determine if California List constituents were contained in *liquid* hazardous waste?

Yes ___ No ___ NA ✓

*PFLT = Paint Filter Liquids Test [Test Method 9095, EPA Publication No. SW-846]

If yes, list the wastes for which PFLT was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results. [40 CFR 268.7 (a)(5)]

_____

_____

3. Does the generator treat restricted wastes in 90-day tanks or containers regulated under 40 CFR 262.34 (permissible in some states)?

Yes ___ No ✓ (If No, go to 4.)

Does the generator treat the wastes to meet appropriate treatment standards/prohibition levels?

Yes ___ No ___

If yes, has the generator prepared a waste analysis plan detailing the frequency of testing to be conducted? 40 CFR 268.7(a)(4)]

Yes ___ No ___ (If No, go to 4.)

Does the plan fulfill the following? [40 CFR 268.7(a)(4)(i)]

___ Based on a detailed chemical and physical analysis of a representative sample
___ Contains information necessary to treat the wastes in accordance with 40 CFR Part 268 requirements

Has the plan been filed with the Regional Administrator (return receipt, Federal Express slip, etc. required for verification)? [40 CFR 268.7(a)(4)(ii)]

Yes ___ No ___

Comments _____

4. Dilution Prohibition [40 CFR 268.3]:

a. Does the generator mix prohibited* wastes with different treatment standards?

*See Appendix E for distinction between restricted and prohibited wastes.

Yes ___ No ✓ (If No, go to b.)

List the wastes _____

Are the wastes amenable to the same type of treatment? [55 FR 22666]

Yes ___ No ___

Comments _____

b. Does the generator dilute prohibited wastes to meet treatment standard criteria, or render them non-hazardous? [55 FR 22665-22666]

Yes ___ No ✓ (If No, go to c.)

Check appropriate category:

___ Dilutes to meet treatment standards
___ Dilutes to render waste non-hazardous

Do the wastes fall into the following categories? (Check if appropriate.) [40 CFR 268.3(b)]

___ Managed in treatment systems regulated under the Clean Water Act
___ Non-toxic* characteristic wastes
___ Treatment standard specified in 40 CFR 268.41 or 268.43

*Non-toxic = D001(except high TOC nonwastewaters), D002, and D003(except cyanides and sulfides). [55 FR 22666].

If the wastes do not fall into the above categories, briefly describe the conditions under which they were diluted.

_____

c. Based on an assessment of points a. and b., and any other relevant circumstances, does the generator dilute prohibited wastes as a substitute for adequate treatment? [40 CFR 268.3(a)]

Yes ___ No ✓

Comments _____

5. F039 Multi-source leachate: Has the generator run an initial analysis for all constituents of concern in 40 CFR 268.41 and 268.43? [55 FR 22620]

Yes ___ No ___ NA ✓

C. Management

1. On-Site Management

a. Are restricted wastes treated (other than in a RCRA exempt unit), stored for greater than 90 (small quantity generator* - 180) days, or disposed on site?

Yes ✓ No ___

(If yes, the TSD Checklist must also be completed.)

* Small quantity generator = generator of greater than or equal to 100 kg/mo. but less than 1,000 kg/mo. hazardous waste, or less than 1 kg/mo. acutely hazardous waste

Comments FACILITY HAS INTERIM STATUS

b. If the generator treats characteristic wastes in systems regulated under the Clean Water Act, have the following been documented: the determination of restriction, how restricted wastes are managed, and why wastes discharged pursuant to an NPDES permit are not prohibited (if applicable)? [55 FR 22662]

Yes ___ No ___ NA ✓

c. If the generator treats characteristic wastes in RCRA exempt units to render them non-hazardous, are the wastes managed as restricted until 40 CFR Part 268 treatment standards are met?* [40 CFR 268.9(d)]

Yes ___ No ___ NA ✓

*This applies to both concentration based treatment standards specified in 40 CFR 268.41 and 268.43, and to some 40 CFR 268.42 required methods which result in treatment below the characteristic level. See Appendix D.

2. Off-Site Management: Waste Exceeds Treatment Standards

a. Does the generator ship any waste that exceeds treatment standards /prohibition levels (not subject to a national capacity variance) to an off-site treatment or storage facility?

Yes ✓ No ___ (If No, go to 3.)

Identify waste code(s) and off-site treatment or storage facilities to which wastes are shipped.

Waste Code	Receiving Facility
F001, 2, 3+5	S-R: CLARKSVILLE, MO + HEBRON, OH
D001	S-R: DOLTON, IL + FRANKLIN PK., IL

Does the generator provide a notification to the treatment or storage facility? [40 CFR 268.7(a)(1)]

Yes ✓ No ___ (If No, go to 3.)

If the generator specifies alternative treatment standards for lab packs, is the certification required in 40 CFR 268.7(a)(7) or (8) included with the notification?

Yes ___ No ___ NA ✓

b. Is a notification sent with each waste shipment?

Yes ✓ No ___

If no, is the waste subject to a tolling agreement pursuant to 262.20(e) (small quantity generator only)?

Yes ___ No ___ (If No, go to 3.)

List waste codes and subsequent handler with whom a contractual tolling agreement is held.

Waste Code	Subsequent Handler
___	_____
___	_____
___	_____

Did the small quantity generator provide a notification to the receiving facility with the first waste shipment subject to the tolling agreement? [40 CFR 268.7(a)(9)]

Yes ___ No ___

3. Off-Site Management: Waste Meets Treatment Standards

a. Does the generator ship waste that meets treatment standards/prohibition levels to an off-site disposal facility?

Yes ___ No ✓ (If No, go to 4.)

Identify waste code(s) and off-site disposal facilities:

Waste Code	Receiving Facility
___	_____
___	_____
___	_____

Does the generator provide a notification and a certification to the disposal facility? [40 CFR 268.7(a)(2)(i) and 268.7(a)(2)(ii)]?

Yes ___ No ___ (If No, go to d.)

b. Are a notification and a certification sent with each waste shipment?

Yes ___ No ___

If no, is the waste subject to a tolling agreement pursuant to 262.20(e) (small quantity generator only)?

Yes ___ No ___ (If No, go to c.)

List waste codes and subsequent handler with whom a contractual tolling agreement is held.

Waste Code	Subsequent Handler
___	___
___	___
___	___

Did the small quantity generator provide a notification and a certification to the receiving facility with the first waste shipment subject to the tolling agreement? [40 CFR 268.7(a)(9)]

Yes ___ No ___

c. Are characteristic wastes which have been rendered non-hazardous (in a RCRA exempt unit) shipped to a Subtitle D facility?

Yes ___ No ___ NA ___ (If No or NA, go to 4.)

Complete the following table:

Waste Code	Receiving Facility
___	___
___	___
___	___

Are a notification and a certification for each shipment sent to the Regional Administrator or authorized State? [40 CFR 268.9(d)(1) and 268.7(b)(5)]?

Yes ___ No ___

4. Off-Site Management: Wastes Subject to Variances, Extensions, or Petitions

a. Does the generator ship wastes to a treatment, storage, or disposal facility which are subject to a national capacity variance (40 CFR Part 268, Subpart C), or case-by-case extension (40 CFR 268.5)?

Yes ___ No ✓ (If No, go to 5.)

Complete the following table:

Waste Code	Receiving Facility
___	___
___	___
___	___

Does the generator provide notification to the off-site receiving facility that the waste is not prohibited from land disposal? [40 CFR 268.7(a)(3)]

Yes ___ No ___

b. Is a notification sent with each waste shipment?

Yes ___ No ___

If no, is the waste subject to a tolling agreement pursuant to 40 CFR 262.20(e) (small quantity generator only)?

Yes ___ No ___ (If No, go to 5.)

List waste codes and subsequent handler with whom a contractual tolling agreement is held.

Waste Code	Subsequent Handler
___	_____
___	_____
___	_____

Did the small quantity generator provide a notification to the receiving facility with the first waste shipment subject to the tolling agreement? [40 CFR 268.7(a)(9)]

Yes ___ No ___

5. Records Retention

Does the generator retain on site copies of all notifications, certifications, and other relevant documents for a period of 5 years? [40 CFR 268.7(a)(6)]

Yes ✓ No ___

Are copies of relevant tolling agreements, along with the LDR notification and/or certification, kept on site for at least 3 years after expiration or termination of the agreement? [40 CFR 268.9]

Yes ___ No ___ NA ✓

Do LDR documents reflect proper management of wastes previously covered under expired national capacity variances, case by case extensions and the soft hammer provision*?

Yes ___ No ___ NA ✓

*See Appendix B. Note that the soft hammer provision expired as of 05/08/90. Soft hammer wastes which had treatment standards established in the Third Third rule were granted a minimum 90-day national capacity variance to 08/08/90.

Comments _____

D. **Treatment Using RCRA 40 CFR Parts 264 and 265 Exempt Units or Processes**

1. Are restricted wastes treated in RCRA exempt units (i.e., boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.)?

   Yes ✓ No ___ (If No, do not complete this section.)

   List types of waste treatment units and processes:

Waste Code	Type of Treatment	Treatment Units and Processes
F001, 2, 3 + 5	RECLAMATION	DISTILLATION UNIT
		WASTEWATER TREATMENT UNIT

2. Are treatment residuals generated from these units?

   Yes ✓ No ___

   Comments _____

3. Are residuals further treated, stored for greater than 90/180 days, or disposed on site?

   Yes ✓ No ___ NA ___

   (If yes, the TSD checklist must also be completed.)

E. **Additional Comments, Concerns, or Issues Not Addressed in the Checklist:**

RCRA LAND DISPOSAL RESTRICTION INSPECTION

IV. TSD REQUIREMENTS

A. Waste Analysis [40 CFR 268.7(b), 264.13, and 265.13]

1. Does the waste analysis plan address the following LDR waste categories? [40 CFR 264.13(b)(6) and 265.13(b)(6)]

F001-F005 Spent Solvents	Yes ✓	No ___	NA ___
F020-F023 and F026-F028 Dioxins	Yes ___	No ___	NA ✓
California List Wastes	Yes ✓	No ___	NA ___
First, Second, and Third Third Wastes	Yes ✓	No ___	NA ___

Comments ___

2. Has the waste analysis plan been revised to address F039 multi-source leachate?

Yes ___ No ___ NA ✓

3. What date was the waste analysis plan last revised? 9/28/90

4. Does analytical data contain all the information required to treat, store, or dispose of restricted wastes? [40 CFR 264.13(a)(1) and 265.13(a)(1)]

Yes ✓ No ___

If yes, which of the following are sources of analytical data? (More than one may apply.):

✓ Generator provides data (INFORMATION ABOUT HOW WASTE IS GENERATED)
✓ Facility performs analyses in on-site laboratory
___ Facility contracts analyses at off-site laboratory

If the generator provides data, does the facility provide corroborative testing? [40 CFR 264.13(a)(2) and 265.13(a)(2)]

Yes ✓ No ___ NA ___

If analyses are conducted off site, identify lab: ___

a. Are wastes with treatment standards specified in 40 CFR 268.41 analyzed using the toxicity characteristic leaching procedure (TCLP)?* (BDAT** = stabilization/immobilization technology) [40 CFR 268.7(b)(1)]

Yes ___ No ___ NA ✓

*See Appendix C for exceptions.
**BDAT = best demonstrated available technology. See Appendix A.

If yes, list the wastes for which TCLP was used and provide the date of last test, frequency of testing, and note any problems. Attach test results. [40 CFR 264.73 (b)(3) and 265.73(b)(3)]

b. Are wastes with treatment standards specified in 40 CFR 268.43 analyzed using total constituent analysis?* (BDAT = destruction/removal technology) [40 CFR 268.7(b)(3)]

Yes ___ No ___ NA ✓

*See Appendix C for exceptions.

If yes, list the wastes for which total constituent analysis was used and provide the date of last test, frequency of testing, and note any problems. Attach test results. [40 CFR 264.73 (b)(3) and 265.73(b)(3)]

c. Is the paint filter liquids test (PFLT) used to determine if California List wastes are contained in *liquid* hazardous waste? [40 CFR 268.32(i)]

Yes ___ No ___ NA ✓

If yes, list the wastes for which PELT was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results. [40 CFR 264.73(b)(3) and 265.73(b)(3)]

B. Operating Record [40 CFR 264.73 and 265.73]

1. Does the operating record contain records and results of waste analyses performed as specified in 40 CFR 268.4 and/or 40 CFR 268.7(b)? [40 CFR 264.73(b)(3) and 265.73(b)(3)]

Yes ✓ No ___

2. Does the operating record contain copies of LDR notifications and certifications?* [40 CFR 264.73(b)(11), (13), and (15) and 40 CFR 265.73(b)(11), (13), and (15)]

Yes ✓ No ___

*Include both those received from generators, and those prepared for off-site shipments.

3. Does the operating record include appropriate documentation for restricted wastes which are managed wholly on site? [40 CFR 264.73(b)(12), (14), and (16) and 265.73(b)(12), (14), and (16)]

Yes ✓ No ___ NA ___

Does the documentation discussed in points 2. and 3. reflect proper historical management of wastes previously covered under expired national capacity variances, case by case extensions, and the soft hammer provision?*

Yes ___ No ___ NA ✓

*Note that the soft hammer provision expired as of 05/08/90. Soft hammer wastes which had treatment standards established in the Third Third rule were granted a minimum 90-day national capacity variance to 08/08/90.

C. Storage [40 CFR 268.50]

1. Are prohibited* wastes stored on site in containers?

Yes ✓ No ___ (If No, go to 2.)

*See Appendix E for distinction between restricted and prohibited wastes.

Are all containers clearly marked to identify the contents and date(s) entering storage? [40 CFR 268.50(a)(2)(i)]

Yes ✓ No ___

Have wastes been stored for more than one year since the applicable LDR regulations went into effect?

Yes ___ No ✓ (If No, go to 2.)

Can the facility show that such accumulation is necessary to facilitate property recovery, treatment, or disposal? [40 CFR 268.50 (c)]

Yes ___ No ___

If yes, state how:_____

2. Are prohibited wastes stored on site in tanks?

Yes ✓ No ___ (If No, go to 3.)

Are all tanks clearly marked with a description of the contents, the quantity of each hazardous waste received, and date each period of accumulation begins, or is such information recorded and maintained in the operating record? [40 CFR 268.50(a)(2)(ii)]

Yes ✓ No ___

Have tanks been emptied at least once per year since the applicable LDR regulations went into effect?

Yes ✓ No ___ (If Yes, go to 3.)

Can the facility show that such accumulation is neccesary to facilitate proper recovery, treatment, or disposal? [40 CFR 268.50(c)]

Yes ___ No ___

If yes, state how:_____

3. Does the facility store liquid hazardous waste containing PCBs at concentrations greater than or equal to 50 ppm?

Yes ___ No ✓ (If No, go to D.)

Does the facility meet the TSCA criteria in 40 CFR 761.65(b)? [40 CFR 268.50(f)]

Yes ___ No ___

Have these wastes been stored for more than one year? [40 CFR 268.50(f)]

Yes ___ No ___

D. Treatment

1. Does the facility treat restricted wastes other than in surface impoundments?

Yes ✓ No ___ (If No, do not complete this section. Go to E.)

2. Are required technologies used to treat wastes which have treatment standards specified in 40 CFR 268.42? [40 CFR 268.40(b)]

Yes ✓ No___ NA___ (If Yes or NA, go to 3.)

Was an alternative method approved?

Yes___ No___

List each waste code, the technology specified in 40 CFR 268.42, and the alternative method. Check if approval of the alternative method is documented. [40 CFR 268.42(b)]

Waste Code	Required Technology	Alternative Method	Approval

3. Lab packs: If alternative treatment standards are specified, are incinerator residues from lab packs containing D004, D005, D006, D007, D008, D010, and D011 treated in compliance with the subpart D treatment standards for these characteristic wastes? [40 CFR 268.42(c)(4)]

Yes___ No___ NA ✓

4. Describe all other waste codes and treatment processes:

Waste Code	Treatment Processes
F001, 2, 3, 5	DISTILLATION FRACTIONATION
D001	LIQUID - LIQUID EXTRACTION

5. Characteristic wastes:

Is the 40 CFR Part 268 treatment standard lower than the 40 CFR Part 261 characteristic level?*

Yes ✓ No ___

*This applies to both concentration based treatment standards specified in 40 CFR 268.41 and 268.43, and to some 40 CFR 268.42 required methods which result in treatment below the characteristic level. See Appendix D.

If yes, does the facility manage the waste as restricted until 40 CFR Part 268 treatment standards are met, even after the waste is rendered non-hazardous? [40 CFR 268.9(d)]

Yes ✓ No ___

Comments ___

6. Dilution Prohibition [40 CFR 268.3]:

a. Does the facility mix prohibited wastes with different treatment standards?

Yes ___ No ✓ (If No, go to c.)

List the wastes ___

b. Are the wastes amenable to the same type of treatment? [55 FR 22666]

Yes ___ No ___

If yes, is this method used for the aggregated wastes?

Yes ___ No ___

Comments ___

c. Based on an assessment of points a. and b., or any other relevant information, is dilution used as a substitute for treatment? [40 CFR 268.3(a)]

Yes ___ No ✓

Comments ___

7. Does the facility, in accordance with an acceptable waste analysis plan, test residues from all treatment processes? [40 CFR 268.7(b)]

Yes ✓ No ___

Comments _____

8. Does the facility ship any characteristic wastes which have been rendered non-hazardous to a Subtitle D facility?

Yes ___ No ✓ (If No, go to 9.)

Complete the following table:

Waste Code	Receiving Facility
___	_____
___	_____
___	_____

Are a notification and a certification for each shipment sent to the Regional Administrator or authorized State? [40 CFR 268.9(d)(1) and 268.7(b)(5)]

Yes ___ No ___

9. Does the facility ship any wastes or treatment residues to an off-site land disposal facility?

Yes ___ No ✓ (If No, go to 10.)

Complete the following table:

Waste Code	Receiving Facility
___	_____
___	_____
___	_____

Are a notification and a certification provided to the land disposal facility with each waste shipment? [40 CFR 268.7(b)(4) and 40 CFR 268.7(b)(5)]

Yes ___ No ___

10. Does the facility ship any wastes or treatment residues to be further managed at a different treatment or storage facility?

Yes ✓ No ___ (If No, go to E.)

Complete the following table:

Waste Code	Receiving Facility
F001, 2, 3 + 5	S-K: CLARKSVILLE, MD + HEBRON, OH
D001	S-K: DOLTON, IL + FRANKLIN PK, IL

Are appropriate generator notifications and certifications provided to the receiving facility with each waste shipment? [40 CFR 268.7(b)(6)]

Yes ✓ No ___

E. Surface Impoundments [40 CFR 268.4]

1. Are restricted wastes placed in surface impoundments for treatment?

Yes ___ No ✓ (If No, go to F.)

List ___

2. Are evaporation or dilution the only recognizable treatment occurring in the surface impoundment? [40 CFR 268.3(a) and 268.4(b)]

Yes ___ No ___

Comments ___

3. Has the facility submitted to the Agency a waste analysis plan and certification of compliance with minimum technology requirements and ground-water monitoring requirements? [40 CFR 268.4(a)(4)]

Yes ___ No ___

4. If the minimum technology requirements have not been met, has a waiver been granted for that unit? [40 CFR 268.4(a)(3)(ii)]

Yes ___ No ___ NA ___

5. Are representative samples of sludge and supernatant from the surface impoundment tested separately, acceptably, and in accordance with the sampling frequency and analyses specified in the waste analysis plan? (Attach test results.) [40 CFR 268.4(a)(2)(i)]

Yes ___ No ___

6. Does the operating record adequately document the results of waste analyses performed in accordance with 40 CFR 268.4? [40 CFR 264.73(b)(3) and 265.73(b)(3)]

Yes ___ No ___

Comments ___

7. Do the treatment residues (sludges or liquids) exceed applicable treatment standards/prohibition levels?

Sludge Yes ___ No ___ Waste Code _____
Supernatant Yes ___ No ___ Waste Code _____

Provide the frequency of analyses conducted on treatment residues:

_____

8. If sludge residues exceed treatment standards/prohibition levels, are they removed on an annual basis? [40 CFR 268.4(a)(2)(ii)]

Yes ___ No ___ NA___

Comments _____

Are residues subsequently managed in another surface impoundment? [40 CFR 268.4(a)(2)(iii)]

Yes ___ No ___

9. If supernatant is determined to exceed treatment standards, is annual throughput greater than impoundment volume? [40 CFR 268.4(a)(2)(ii)]

Yes ___ No ___ NA___

Comments_____

F. **Land Disposal**

1. Are restricted wastes placed in or on the land in units such as landfills, surface impoundments*, waste piles, land treatment units, salt domes/beds, mines/caves, concrete vaults, or bunkers? [40 CFR 268.2(c)]

Yes ___ No ✓ (If No, go to G.)

*Note: Do not include surface impoundments addressed in E.

If yes, specify which units and what wastes each unit has received:

Unit	Waste
_____	_____
_____	_____
_____	_____

2. Does the facility, in accordance with an acceptable waste analysis plan, test prohibited wastes prior to land disposal to ensure that all applicable treatment standards and/or prohibition levels have been met? [40 CFR 268.7(c)(2)]

Yes ___ No ___

Comments_____

3. Does the facility test wastes to ensure that they do not exhibit any characteristics at the point of disposal?* [40 CFR 268.9(c)]

Yes ___ No ___ NA___

*Note: A waste may exceed a characteristic level only if the treatment standard for that characteristic has been met.

4. Does the operating record adequately document the results of waste analyses performed in accordance with 40 CFR 268.7(c)? [40 CFR 264.73(b)(3) and 265.73(b)(3)

Yes ___ No ___

If yes, at what frequency are analyses performed?_____

_____

5. Does the facility land dispose of restricted wastes which are not prohibited?

Yes ___ No ___ (If No, go to 6.)

List waste codes in appropriate category below:

National Capacity Variance (40 CFR Part 268, Subpart C)_____
Case-By-Case Extension (40 CFR 268.5)_____
No-Migration Petition (40 CFR 268.6)_____
Treatment Standard Variance (40 CFR 268.44)_____

Does the operating record contain records of the quantities, date of placement, and a copy of the generator notification [40 CFR 268.7(a)(3)] for each shipment of restricted waste subject to a case-by case extension or no-migration petition? [40 CFR 264.73(b)(10) and 265.73(b)(10)]

Yes ___ No ___ NA ___

Do land disposal units receiving wastes covered by a national capacity variance or case-by-case extension meet the requirements in 40 CFR 268.5(h)(2)?

Yes ___ No ___ NA ___

If the facility has a case-by-case extension, is progress being made as described in reports to the Regional Administrator?

Yes ___ No ___ NA ___

6. Are restricted wastes placed in underground injection wells?

Yes ___ No ___ List _____

G. Other Wastestreams

1. Does the facility generate wastes other than residues from RCRA treatment units?

Yes ✓ No ___ (If No, go to H.)

2. On-Site Management

a. If characteristic wastes are treated in systems regulated under the Clean Water Act, have the following been documented: the determination of restriction, how restricted wastes are managed, and why wastes discharged pursuant to an NPDES permit are not prohibited (if applicable)? [55 FR 22662]

Yes ___ No ___ NA ✓

b. If characteristic wastes are treated in RCRA exempt units to render them non-hazardous, are the wastes managed as restricted until 40 CFR Part 268 treatment standards are met?* [40 CFR 268.9(d)]

Yes ___ No ___ NA ✓

*This applies to both concentration based treatment standards specified in 40 CFR 268.41 and 268.43, and to some 40 CFR 268.42 required methods which result in treatment below the characteristic level. See Appendix D.

3. Off-Site Management: Waste Exceeds Treatment Standards

Are wastes that exceed treatment standards/prohibition levels (not subject to a national capacity variance) shipped to an off-site treatment or storage facility?

Yes ✓ No ___ (If No, go to 4.)

Identify wastes code(s) and off-site treatment or storage facilities to which wastes are shipped.

Waste Code	Receiving Facility
F001, F002	S-K: HEBRON, OH
F003, F005	S-K: DOLTON, IL
D001	S-K: FRANKLIN PK, IL

Are LDR notifications provided for each shipment to the treatment or storage facility? [40 CFR 268.7(a)(1)]

Yes ✓ No ___ (If No, go to 4.)

If alternative treatment standards are specified for lab packs, is the certification required in 40 CFR 268.7(a)(7) or (8) included with the notification?

Yes ___ No ___ NA ✓

4. Off-Site Management: Wastes Meets Treatment Standards

a. Are wastes that meet treatment standards/prohibition levels shipped to an off-site disposal facility?

Yes ___ No ✓ (If No, go to 5.)

Identify waste code(s) and off-site disposal facilities:

Waste Code	Receiving Facility
_____	_____
_____	_____
_____	_____

Are LDR notifications and certifications provided for each shipment to the disposal facility? [40 CFR 268.7(a)(2)(i) and 268.7(a)(2)(ii)]?

Yes ___ No ___ (If No, go to b.)

b. Are characteristic wastes which have been rendered non-hazardous (in a RCRA exempt unit) shipped to a Subtitle D facility?

Yes ___ No ___ NA ___ (If No or NA, go to 5.)

Complete the following table:

Waste Code	Receiving Facility
_____	_____
_____	_____
_____	_____

Are a notification and a certification for each shipment sent to the Regional Administrator or authorized State? [40 CFR 268.9(d)(1) amd 268.7(b)(5)?

Yes ___ No ___

5. Off-Site Management: Wastes Subject to Variances, Extensions, or Petitions

a. Are wastes that are subject to a national capacity variance (40 CFR Part 268, Subpart C) or a case-by-case extension (40 CFR 268.5) shipped to a treatment, storage, or disposal facility?

Yes ___ No ✓ (If No, go to 6.)

Complete the following table:

Waste Code	Receiving Facility

b. Are LDR notifications (stating that the waste is not prohibited from land disposal) provided for each shipment to the off-site receiving facility? [40 CFR 268.7(a)(3)]

Yes ___ No ___

6. Dilution Prohibition [40 CFR 268.3]:

a. Are prohibited* wastes with different treatment standards mixed?

*See Appendix E for distinction between restricted and prohibited wastes.

Yes ___ No ✓ (If No, go to b.)

List the wastes_____

Are the wastes amenable to the same type of treatment? [55 FR 22666]

Yes ___ No ___

Comments_____

b. Are prohibited wastes diluted to meet treatment standard criteria, or render them non-hazardous? [55 FR 22665-22666]

Yes ___ No ✓ (If No, go to c.)

Check appropriate category:

___Dilutes to meet treatment standards
___Dilutes to render waste non-hazardous

Do wastes fall into the following categories? (Check if appropriate.) [40 CFR 268.3(b)]

___Managed in treatment systems regulated under the Clean Water Act
___Non-toxic* characteristic wastes
___Treatment standard specified in 40 CFR 268.41 or 268.43

*Non-toxic = D001 (except high TOC nonwastewaters), D002, and D003 (except cyanides and sulfides). [55 FR 22666]

If the wastes do not fall into the above categories, briefly describe the conditions under which they were diluted.

_____
_____
_____

c. Based on an assessment of points a. and b., and any other relevant circumstances, are prohibited wastes diluted as a substitute for adequate treatment? [40 CFR 268.3(a)]

Yes ___ No ✓

Comments_____

H. Additional Comments, Concerns, or Issues Not Addressed in the Checklist:

_____
_____
_____
_____
_____
_____
_____
_____
_____
_____
_____
_____
_____
_____
_____
_____
_____
_____
_____
_____
_____
_____
_____
_____

Name of Facility: SAFETY-KLEEN CORP. CHICAGO RECYCLE CENTER

I.D. Number: ILD 005450697

Location: 1445 WEST 42ND STREET
CHICAGO, ILLINOIS 60609

Date of Inspection: JULY 21, 1992

Inspector: DONNA CZECH

Telephone Number: (708) 531-5900

- [x] Interim Status
- [ ] RCRA Permit
- [ ] Treatment
- [x] Storage
- [ ] Disposal
- [ ] Land Disposal Facility

Are there any known releases? Yes ___ No ✓

Does the unit receiving CERCLA waste meet the double liner requirements? Yes ___ No ___ N/A ✓

Any Class I violations? Yes ___ No ✓

If yes, identify type briefly: ___

Schedule for next inspection: JANUARY 1993

RECEIVED
30 JUL 1992
IEPA/DLPC

Please complete this form and mail it within 24 hours of the date of inspection.

FOLD ON LINE

United States
Environmental Protection Agency
230 South Dearborn
Chicago, Illinois 60604

Official Business
Penalty for Private Use $300

NO POSTAGE NECESSARY IF MAILED IN THE UNITED STATES

BUSINESS REPLY MAIL

FIRST CLASS PERMIT NO 11863 WASHINGTON DC

POSTAGE WILL BE PAID BY ENVIRONMENTAL PROTECTION AGENCY

U.S. EPA
Waste Management Division
77 West Jackson Blvd.
Chicago, Illinois 60604

Attn: Gertrud Matuschkovitz,HRE-8J

FOLD ON LINE

Illinois Environmental Protection Agency
Division of Land Pollution Control

RCRA INSPECTION REPORT

USEPA #: IL D005450697	IEPA #: 0316000053
Facility Name: SAFETY-KLEEN CORP. CHICAGO RC	Phone #: (312) 247-2828
Street Address: 1445 WEST 42ND STREET	County: COOK
City: CHICAGO	State: ILLINOIS Zip: 60609
Region: MAYWOOD	Inspection Date: 1/17/92 From: 9:15am To: 12:45pm
Weather: 20°	

TYPE OF FACILITY

Notified As: G, TRANS, TSD, WAF, OSF	Regulated As: G, S, WAF
LDF? No (Yes or No) HPV? No	90-Day F/U Required?: YES ____ NO ✓

TYPE OF INSPECTION

CEI: ✓ Sampling: ____ Citizen Complaint: ____ Closed: ____ Other: ____

CME/O&M: ____ Record Review: ____ Follow-Up to Inspection of: ____ Withdrawal: ____

NON-REGULATED STATUS N/A

SQG: ____ Claimed Nonhandler: ____ Other (Specify in Narrative): ____

PART A

Notification Date: 8/5/80, from (initial) or (subsequent) Notification.

Initial Part A Date: 11/19/80 Amended: 9/24/90

Part A Withdrawal requested: __/__/__ Approved by (US)(IL) EPA: __/__/__

PART B PERMIT APPLICATION

Part B Permit Submitted: (Y) or N 11/9/88 Final Permit Issued: __/__/__

ENFORCEMENT N/A

Has the firm been referred to -- USEPA: Y or (N) __/__/__

Illinois Attorney General: Y or (N) __/__/__ County State's Attorney: Y or (N) __/__/__

ORDERS ISSUED N/A

CACO: __/__/__ CAFO: __/__/__ Consent Decree: __/__/__

Federal Court Order: __/__/__ State Court Order: __/__/__ IPCB Order: __/__/__

TSD FACILITY ACTIVITY SUMMARY

Activity by Process Code	On Part A?	Activity Conducted Prior to 1980?	Was Activity Ever Done?	Closed	Being done at Time of Insp.?	Exempt per 35 IAC, Sec.	On Annual Report 1990	1989	1988
S01	YES	YES	YES	NO		N/A	YES	YES	NO
S02	YES	YES	YES	NO		N/A	YES	NO	NO
R03	N/A	YES	YES	N/A		725.101 (c)(6)	NO	NO	YES

RECEIVED
FEB 26 1992
OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION V

RECEIVED
20 FEB 1992
IEPA/DLPC

IL 532-1834

OWNER	OPERATOR
Name SAFETY-KLEEN CORP.	Name SAFETY-KLEEN CORP. CHGO. RC
Address 777 BIG TIMBER ROAD	Address 1445 WEST 42ND STREET
City ELGIN	City CHICAGO
State ILLINOIS Zip 60173	State ILLINOIS Zip 60609
Phone # (708) 697-8460	Phone # (312) 247-2828

PERSON(S) INTERVIEWED	TITLE	PHONE #
ALFRED AGHAIEPOUR	FACILITY MANAGER	(312)247-2828

INSPECTION PARTICIPANT(S)	AGENCY/TITLE	PHONE #
DONNA CZECH	IEPA / EPS	(708) 531-5900

PREPARED BY	AGENCY/TITLE	PHONE #
DONNA CZECH	IEPA / EPS	(708) 531-5900

SUMMARY OF APPARENT VIOLATIONS

Area	Class	Section

Area	Class	Section

Area	Class	Section

Facility Name: SAFETY-KLEEN CORP. CHGO. RC

USEPA #: IL D005450697

IEPA #: 0316000053

WASTE DISPOSITION FORM

Waste Name (include haz & waste for which no determination has been made)	Generating Process (For waste gen. on site. N/A for TSD)	Date of Last Analysis	USEPA Haz Waste #	* On 8700-12	* On 3510-3	On Annual Report for: (Circle if present; cross out if not present) * 19 90	* 19 89	* 19 88	Amount on Site	Rate of Generation	Last Manifested Shipment	Disposition
STILL BOTTOMS	RESIDUAL MATERIAL FROM THE DISTILLATION PROCESS	EVERY SHIPMENT ANALYZED	F001 F002 F003 F005	YES	YES	G F	G F	G F	8,871 gallons	approximately 20,000-25,000 gallons/month	1-14-92	SAFETY-KLEEN in CLARKSVILLE, MISSOURI for BLENDING/RECLAMATION
MISCELLANEOUS DRUMMED WASTE	-CLEANING OUT TANKS -USED OIL DRY -HOSE DRIPPINGS -CUT METAL DRUMS	EVERY SHIPMENT ANALYZED	F001 F002	YES	YES	G F	G F	G F	270 drums (liquid)	approximately 60-80 drums/month	1-14-92	SAFETY-KLEEN in HEBRON, OHIO for BLENDING/RECLAMATION
RE MANIFESTED WASTE	-TEMPORARY STORAGE -SHIPPED FOR FURTHER RECLAMATION -WASTE SENT IN ERROR	EVERY SHIPMENT ANALYZED	F001 F002 D001	YES	YES	G F	G F	G F	NONE	approximately 40,000-50,000 gallons/year	12-26-91	SAFETY-KLEEN in DOLTON, ILLINOIS for BLENDING/RECLAMATION
WASTE FILTERS	USED TO FILTER WASTE AND PRODUCT AS MATERIAL ENTERS TANKS	EVERY SHIPMENT ANALYZED	F001 F002 F003 F005	YES	YES	G F	G F	G F	27 drums	approximately 30 drums/month	12-19-91	SAFETY-KLEEN in HEBRON, OHIO for TREATMENT
SPENT SOLVENT	FROM TWO PARTS WASHERS & ONE IMMERSION CLEANER	BULK ANALYSIS AT REC'G. FACILITY	D001 F005	YES	YES	G F	G F	G F	8-10 gallons	1 30-gallon drum/month	1-2-92	SAFETY-KLEEN in FRANKLIN PARK, ILLINOIS for STORAGE (TEMPORARY)
						G F	G F	G F				
						G F	G F	G F				
						G F	G F	G F				
						G F	G F	G F				
						G F	G F	G F				

* All "NO" responses must be explained in narrative.

IL 532-1836

0316000053 - Cook County
Chicago/Safety-Kleen Corp. CRC
ILD005450697

NARRATIVE

Safety-Kleen Corp. Chicago Recycle Center is a solvent recovery facility which receives spent solvents, solvent mixtures and other solvent-containing liquid and solid wastes from Safety-Kleen service centers, other Safety-Kleen recycle centers, and from industrial and commercial customers. Wastes are received in containers and in bulk shipments by tank trailer. Spent solvents and solvent-containing wastes are recovered by a combination of processes including neutralization, distillation, fractionation, liquid-liquid extraction and drying. Recovered products are either returned to the Safety-Kleen toll customer or marketed as recovered solvent.

The Chicago Recycle Center handles primarily two accounts: 1) the toll business and 2) the recycling business. The toll business constitutes approximately 50 percent of the total volume of waste handled by the facility. In this situation, the toll customer (generally industrial accounts) ships waste or off specification material to the Chicago Recycle Center for treatment. The facility then recycles the material to the customer's specifications and returns the material to the original generator.

The recycling business consists of industrial solvents which come to the Chicago Recycle Center from the Safety-Kleen sales network. These waste materials are recycled at the facility to Safety-Kleen corporate specifications and the processed material is sold as product on the open market.

Hazardous Wastes

1. Still Bottoms (F001, F002, F003, F005)
   - residual material from the distillation process
   - approximately 20,000-25,000 gallons are generated per month
   - shipped to Safety-Kleen in Clarksville, Missouri for fuel blending or further reclamation
   - 1-2 shipments are made every week
   - 8,871 gallons were on site in bulk storage

2. Miscellaneous Drummed Waste (F001, F002)
   - wastes generated by various methods:
     a) drippings into buckets from hose lines
     b) residual material from cleaning out tanks
     c) used oil dry
     d) "cutters" - drums which must be cut open in order to remove solid material contained inside
   - approximately 60-80 drums are generated per month
   - shipped to Safety-Kleen in Hebron, Ohio for fuel blending or further reclamation
   - shipments are made approximately three times per year
   - 270 drums were on site

3. Remanifested Waste (F001, F002, D001)
   - wastes generated by various methods:
     a) waste received that is not intended for reclamation on site but is stored temporarily until it is sent for off-site reclamation
     b) Safety-Solvent received from off site for fractionation but is sent to Safety-Kleen in Dolton when this facility's unit is otherwise occupied
     c) waste sent to this facility erroneously (because the waste fits the description of waste streams that this facility is permitted to accept)
   - approximately 40,000-50,000 gallons are generated per year
   - shipped to Safety-Kleen in Dolton, Illinois for fuel blending or further reclamation
   - at most, shipments are made five times per year
   - none was on site

4. Waste Filters (F001, F002, F003, F005)
   - used to filter waste as it is pumped into tanks
   - approximately 30 drums are generated per month
   - shipped to Safety-Kleen in Hebron, Ohio for treatment
   - at most, three shipments are made per year
   - 27 drums were on site

5. Spent Solvent (D001, F005)
   - from two parts washers and one immersion cleaner
   - approximately one 30-gallon drum is generated per month
   - shipped to Safety-Kleen in Franklin Park, Illinois for storage prior to off-site reclamation
   - eight to ten gallons were on site

<u>Hazardous Waste Units</u>

1. S01 - Container Storage Area #1
   - used for the storage of hazardous and non-hazardous wastes which are generated off site and on site
   - concrete pad with concrete curbs
   - 2-foot wide trench runs along the east side of the area and into a cistern

2. S02 - Tank Farms #1, #2, #3, #4, and #5
   - all are constructed of reinforced concrete with concrete perimeter dikes
   - Tank Farms #1, #2, #3 and #5 have been provided with an impermeable coating as an addition to the existing secondary containment

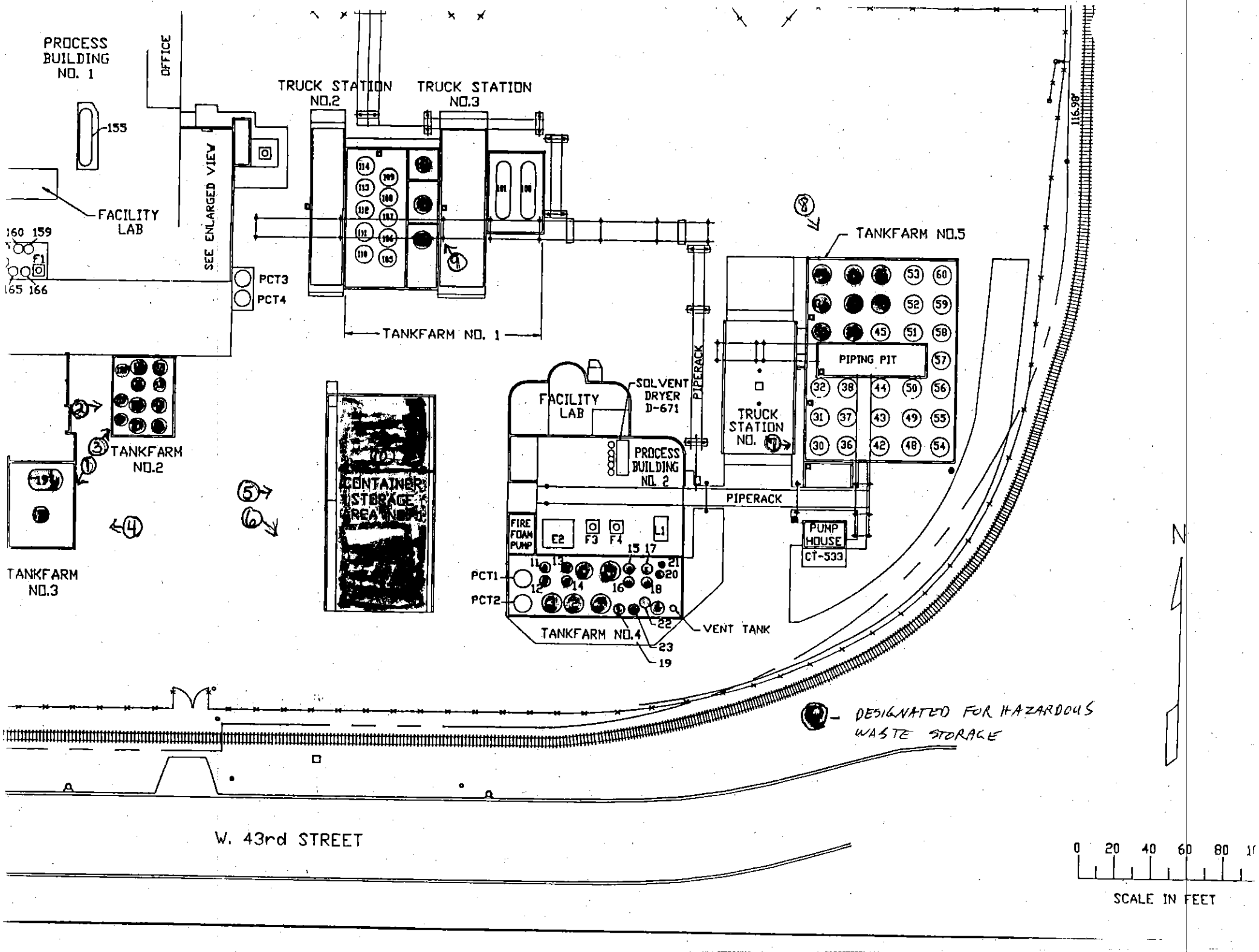
Notes

This facility has received a supplemental permit to accept certain waste solvents from off site on a generic basis for storage, recovery and/or fuel blending. At the time of this inspection, hazardous waste fuel was being blended on site for shipment to the Safety-Kleen facility in Clarksville, Missouri.

Tanks #102 - #104 in Tank Farm #1 were brought into operation as hazardous waste storage tanks as of late 1990 or early 1991. Tanks #190 - #193 in Tank Farm #3 have been cleaned and removed from the site. The facility is awaiting final certification of closure of these tanks from the project engineer.

At the time of this inspection, this facility was operating as a generator, a storage facility, and a marketer of hazardous waste fuel. The facility appeared to be operating in compliance with all of the applicable RCRA regulations.

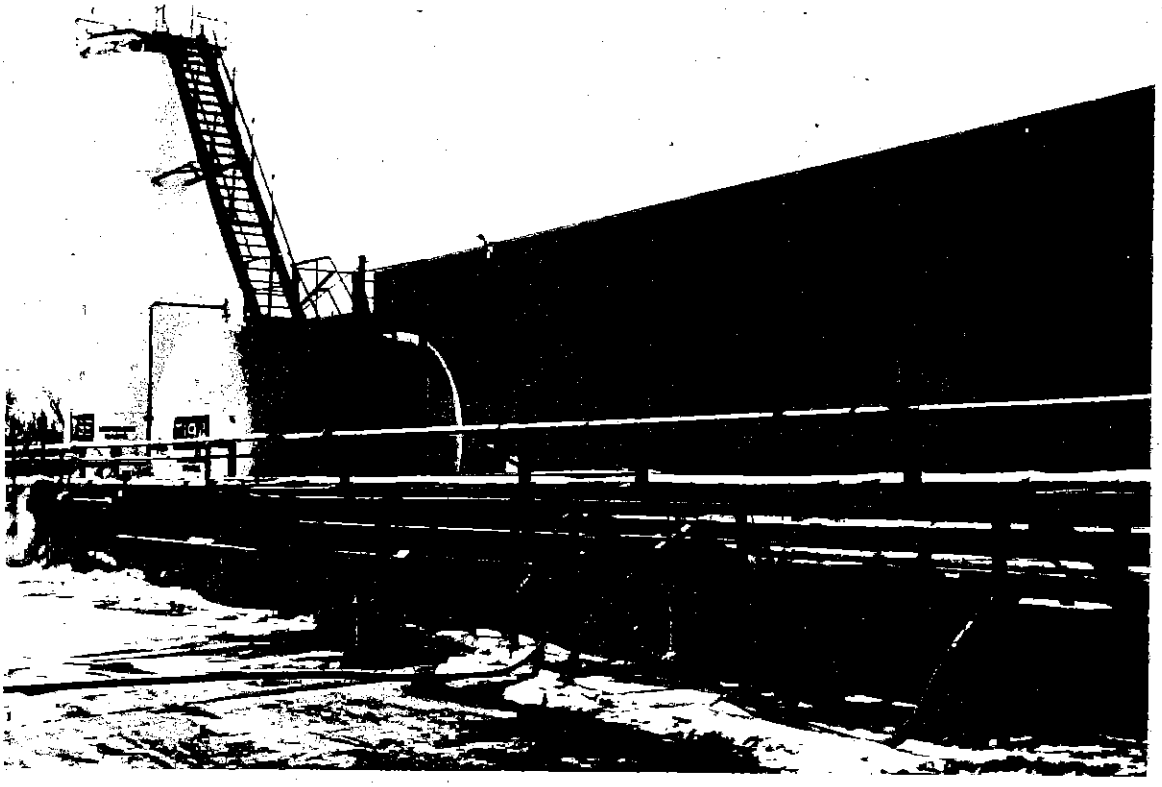
DC:fs:31


PROCESS BUILDING NO. 1
OFFICE
155
FACILITY LAB
160 159
165 166
SEE ENLARGED VIEW
PCT3
PCT4
TRUCK STATION NO.2
TRUCK STATION NO.3
TANKFARM NO. 1
TANKFARM NO.2
TANKFARM NO.3
CONTAINER STORAGE AREA
FACILITY LAB
SOLVENT DRYER D-671
PROCESS BUILDING NO. 2
PIPERACK
TRUCK STATION NO. 7
TANKFARM NO.5
PIPING PIT
PIPERACK
FIRE FOAM PUMP
E2
F3
F4
L1
PCT1
PCT2
TANKFARM NO.4
VENT TANK
PUMP HOUSE
CT-533
DESIGNATED FOR HAZARDOUS WASTE STORAGE
N
W. 43rd STREET
0 20 40 60 80
SCALE IN FEET

Illinois Environmental Protection Agency Photographs

Site Name: Safety-Kleen Corp. Chicago Recycle Center Site #: 0316000053

Date: 1-17-92 Time: 9:15am - 12:45pm Photograph By: D. Czech



Comments: FACING S-SW: TANK FARM #3. TANKS #190-#193 HAVE BEEN REMOVED.

Roll #: 92-216 Photo #: 1

Comments: FACING EAST: SATELLITE ACCUMULATION AREA LOCATED NEAR TANK FARM #2.

Roll #: 92-216 Photo #: 2

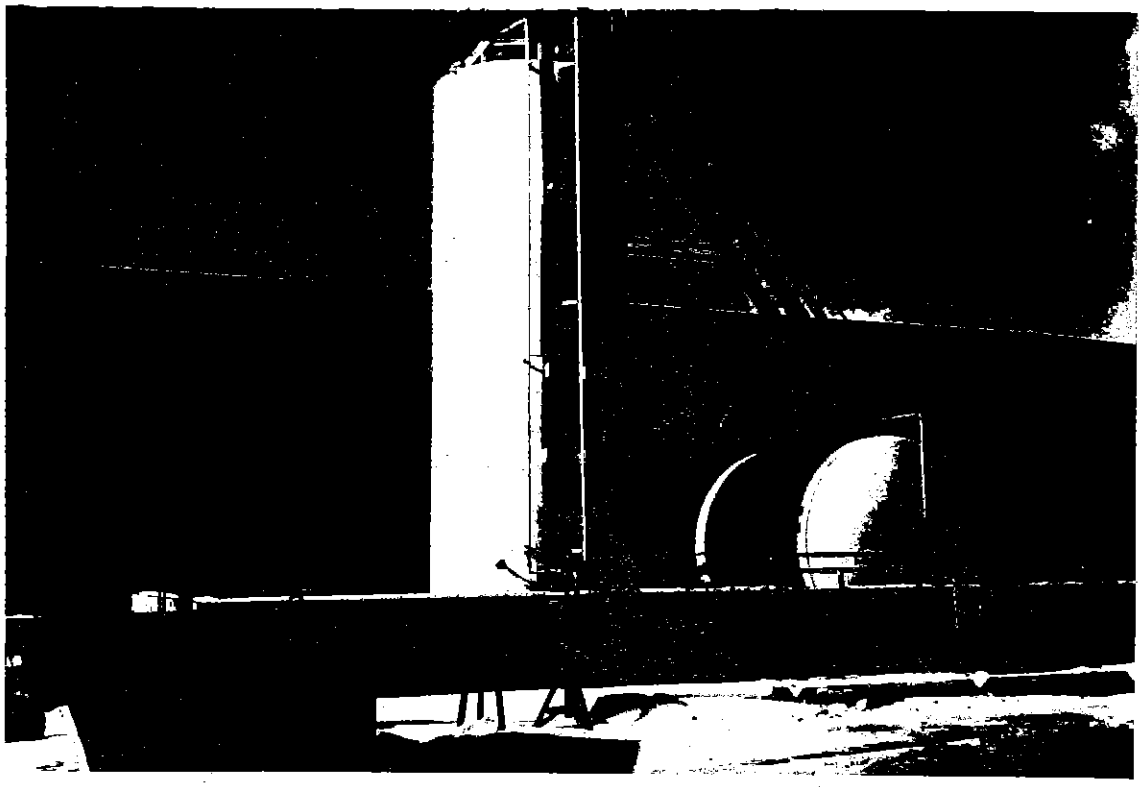
Illinois Environmental Protection Agency Photographs

Site Name: Safety-Kleen Corp. Chicago Recycle Center Site #: 0316000053

#: 1-17-92 Time: 9:15am - 12:45pm Photograph By: D. Czech

Comments: FACING N-NE; TANK FARM #2

Roll #: 92-216 Photo #: 3



Comments: FACING WEST; TANK FARM #3

Roll #: 92-216 Photo #: 4

Illinois Environmental Protection Agency Photographs

Site Name: Safety-Kleen Corp. Chicago Recycle Center Site #: 0316000053

Date: 1-17-92 Time: 9:15am - 12:45pm Photograph By: D. Czech

Comments: FACING EAST: CONTAINER STORAGE AREA #1.

Roll #: 92-216 Photo #: 5

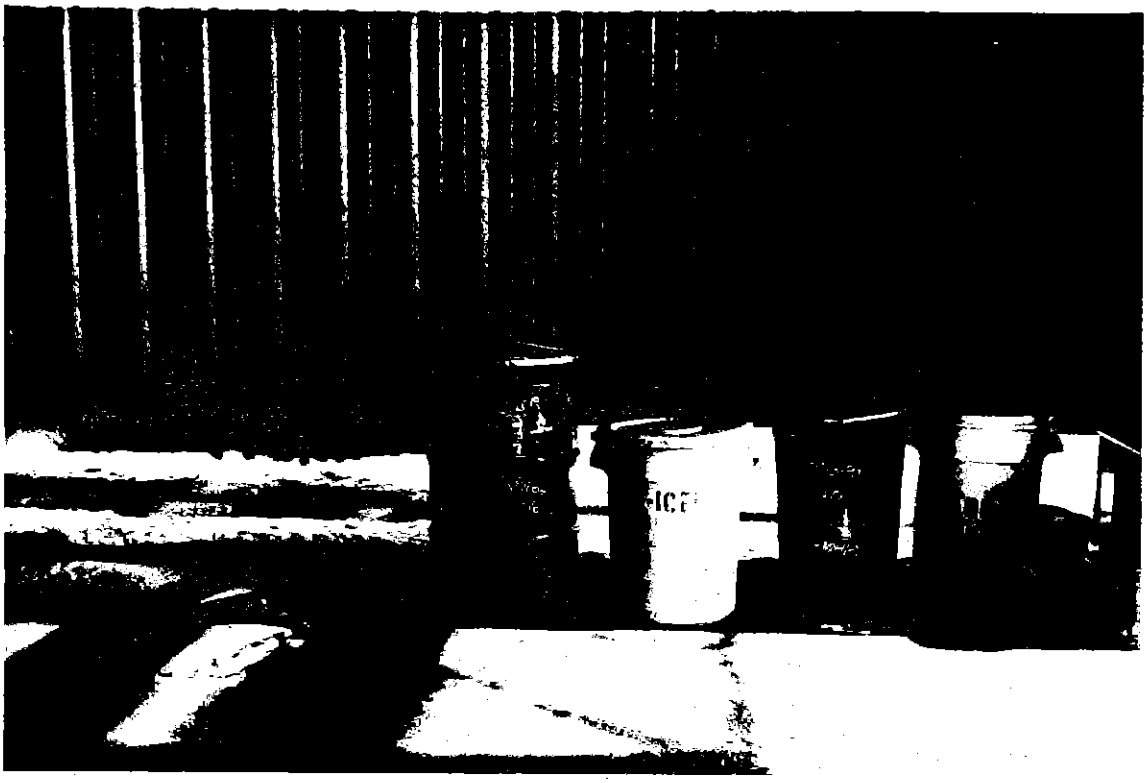
Comments: FACING E-SE: SAME AS ABOVE.

Roll #: 92-216 Photo #: 6

Illinois Environmental Protection Agency Photographs

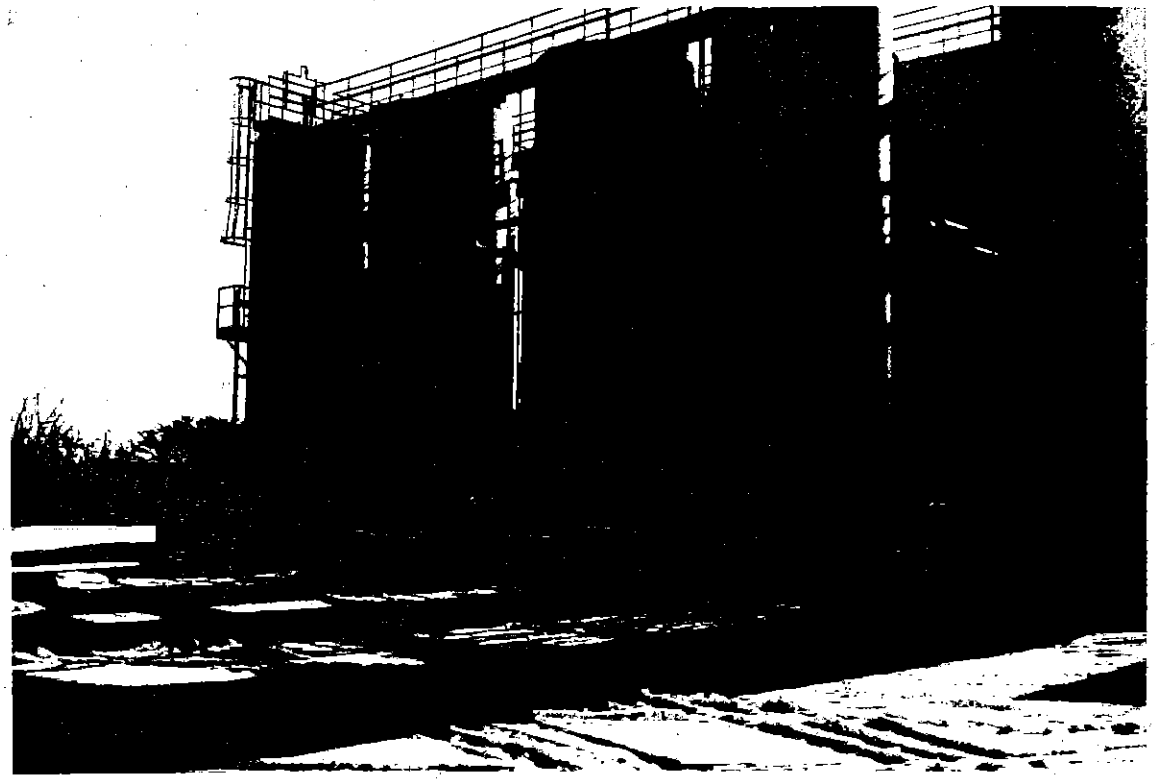
Site Name: Safety-Kleen Corp. Chicago Recycle Center Site #: 0316000053

Date: 1-17-92 Time: 9:15am - 12:45pm Photograph By: D. Czech



Comments: FACING EAST: SATELLITE ACCUMULATION AREA LOCATED INSIDE TRUCK STATION # 1.

Roll #: 92-216 Photo #: 7



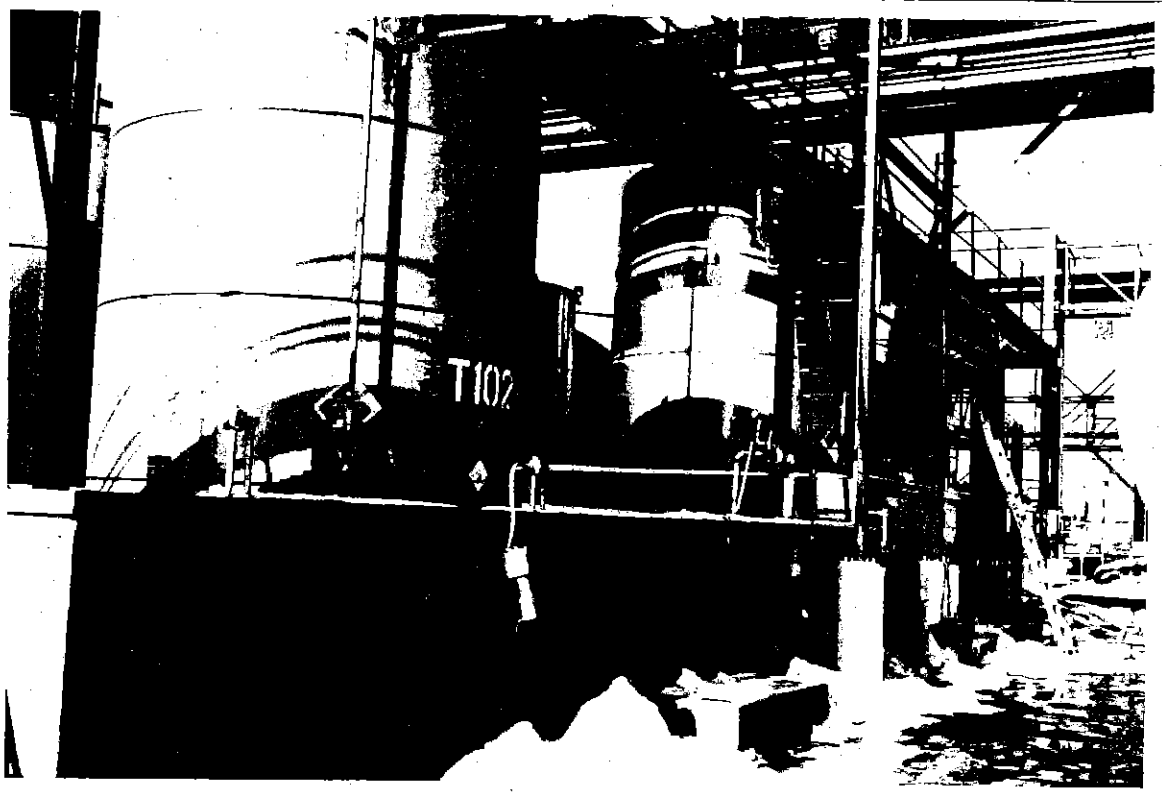
Comments: FACING S-SE: TANK FARM #5.

Roll #: 92-216 Photo #: 8

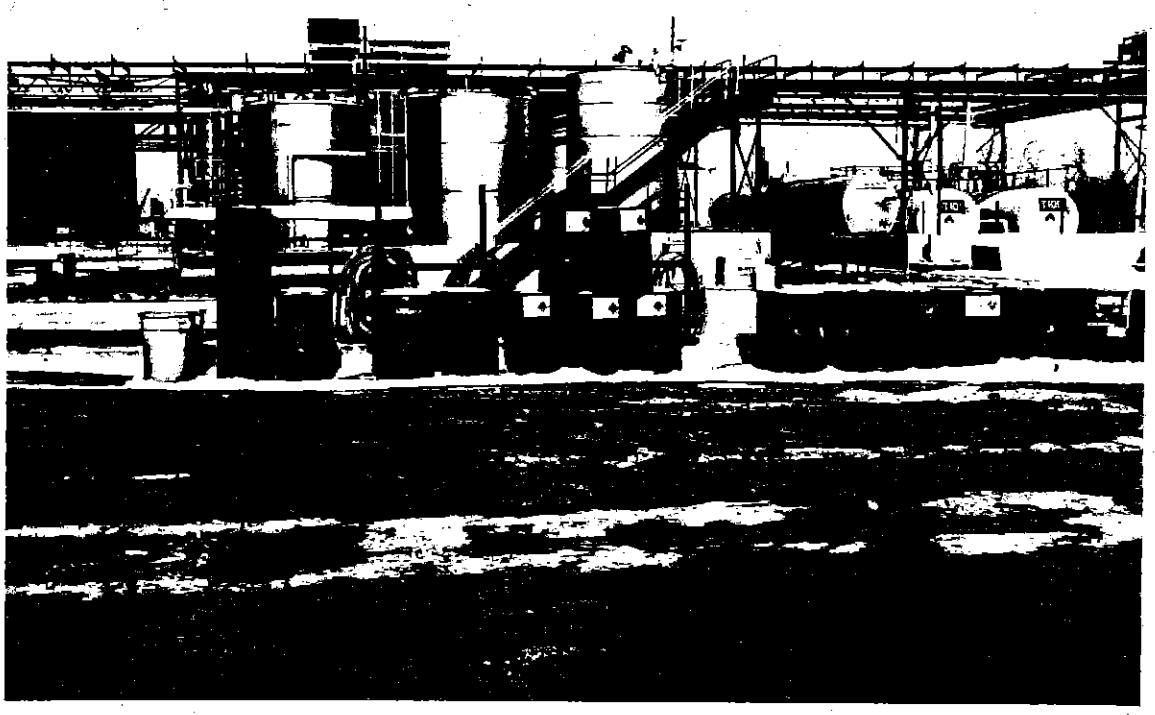
Illinois Environmental Protection Agency Photographs

Site Name: Safety-Kleen Corp. Chicago Recycle Center Site #: 0316000053

Date: 1-17-92 Time: 9:15am - 12:45pm Photograph By: D. Czech



Comments: FACING W-NW: TANKS #102-#104 IN TANK FARM #1 ARE CURRENTLY USED AS HAZARDOUS WASTE STORAGE TANKS. Roll #: 92-216 Photo #: 9



Comments: FACING NORTH: FORMER LOCATION (FOREGROUND) OF TANK #199 WHICH HAS BEEN REMOVED AND RCRA CLOSED Roll #: 92-216 Photo #: 10

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	In Apparent Compliance? No	Not Applicable	Remarks or Comment No
				PART 722 **GENERATOR STANDARDS** **Subpart A: General**				
OTH	1			**Section 722.111: Hazardous Waste Determination**	✓			
				Has the generator determined if the solid waste it generates is a hazardous waste? Yes ✓ No ___				
				Did the generator follow the procedures specified in this section in making its determination? Yes ✓ No ___				
OTH	1			**Section 722.112: USEPA Identification Number**	✓			
			a	Has the generator obtained a USEPA identification number? Yes ✓ No ___				
			c	Has the generator offered his hazardous waste only to transporters or to treatment, storage or disposal facilities that have received a USEPA identification number? Yes ✓ No ___				

RECEIVED
20 FEB 1992
IEPA/DLPC

Area	Class	90 Day F U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No
MAN	2			**PART 722** **GENERATOR STANDARDS** **Subpart B: The Manifest** **Section 722.120: General Requirements**	✓			
			a	Has the generator who transports, or who offers its hazardous waste for transportation off-site for treatment, storage or disposal prepared a uniform hazardous waste manifest? Yes ✓ No ___ **Note: If the generator has not used a manifest, check "No" in the Apparent Compliance Column and skip to 722.130.**				
			b	Did the generator designate on the manifest one facility which is permitted to handle the hazardous waste therein described? Yes ✓ No ___ **Note: The generator may also designate an alternate facility permitted to handle the hazardous waste in the event an emergency prevents delivery of the hazardous waste to the primary designated facility.**				
			d	In any instances where the transporter was unable to deliver the hazardous waste to the designated or alternate permitted facility, has the generator designated another permitted facility or instructed the transporter to return the waste? Yes ___ No ___ N/A ✓				WASTE ALWAYS DELIVERED TO DESIGNATED FACILITY

IL 532-1592

Area	Class	90 Day F U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No
MAN	2			**Section 722.121: Acquisition of Manifests**	✓			
			a	Did the generator use the manifest supplied by the Agency for hazardous waste going for treatment, storage or disposal in Illinois? Yes ✓ No ___ N/A ___				
			b	For hazardous waste going outside Illinois for treatment, storage or disposal, has the generator used the manifest supplied by the Agency if the State to which the hazardous waste is being shipped does not supply and require the completion of its own State manifest? **or** For hazardous waste going outside Illinois for treatment, storage or disposal, has the generator used the manifest required by the State to which the hazardous waste is being shipped? Yes ✓ No ___ N/A ___				
MAN	2			**Section 722.122: Number of Copies**	✓			
				Does the manifest the generator is using consist of at least six copies (plus one copy for each additional transporter)?				
MAN	2			**Section 722.123: Use of the Manifest**	✓			
				For each manifest received, has the generator: 1) Signed the certificate by hand? Yes ✓ No ___ 2) Obtained the handwritten signature and the date of acceptance by the initial transporter? Yes ✓ No ___				

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
				3) Retained one copy as required by Section 722.140(a), Recordkeeping? Yes ✓ No ___				
				4) Apparently sent a copy (Part 5 for Illinois manifests) to the Agency within two working days? Yes ✓ No ___				
				NOTE: Obtain a copy of any manifest which is not in compliance with the requirements of this subsection. If copies are unobtainable, log manifest #s.				
			b	Has the generator apparently given the remaining copies of the manifest to the transporter? Yes ✓ No ___				
			c	Has the generator followed the procedures prescribed in Section 722.123(c) for manifesting bulk shipments of hazardous waste by water? Yes ___ No ___ N/A ✓				NO BULK SHIPMENTS BY WATER OR RAIL
			d	Has the generator followed the procedures prescribed in Section 722.123(d) for manifesting bulk shipments of hazardous waste by rail? Yes ___ No ___ N/A ✓				

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No
				PART 722 **GENERATOR STANDARDS** **Subpart C: Pre-Transport Requirements**			✓	NO WASTE READY FOR TRANSPORTATION OFF SITE
OTH	1	X		**Section 722.130: Packaging** Is waste which is ready for transportation off-site packaged in accordance with 49 CFR, Parts 173, 178 and 179?			✓	
OTH	1	X		**Section 722.131: Labeling** Is each package of hazardous waste which is ready for transportation off-site labeled in accordance with 49 CFR Part 172?			✓	
OTH	1	X		**Section 722.132: Marking**				
			a	Is each package of hazardous waste which is ready for transportation off-site marked in accordance with 49 CFR Part 172? Yes ____ No ____				
			b	Is each package of hazardous waste which is ready for transportation off-site marked with: - The generator's name and address? Yes ____ No ____ - The manifest document number associated with the container? Yes ____ No ____ - The words "Hazardous Waste - Federal Law Prohibits Improper Disposal. If found contact the nearest police, or public safety authority or the U.S. Environmental Protection Agency"? Yes ____ No ____				

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
OTH	1			**Section 722.133: Placarding** Does the generator have, for the waste it generates, the proper placards to: - Placard the transport vehicle, or - Offer to the first transporter, according to 49 CFR, Part 172, Subpart F? **NOTE: If the placards are provided by the transporter, then mark the N/A Column and use Comment field to explain.**	✓			
OTH	1	X		**Section 722.134: Accumulation Time** **NOTE: If the TSD checklist will be completed and the facility only accumulates wastes for 90 days or less for Section 722.134 complete page GEN-C-2(a) then skip to TSD checklist.** **NOTE: A generator who is also a TSD would be subject to this section for any waste which is not identified for storage on the facility's Part A, or which is being accumulated outside a "permitted" storage area.**			✓	FACILITY HAS INTERIM STATUS FOR STORAGE OF HAZARDOUS WASTE — SEE TSD CHECKLIST
			a	**For waste in containers, has** the generator complied with the requirements of 35 Ill. Adm. Code 725, Subpart I: Use and Management of Containers listed below: **NOTE: If no wastes in containers, mark "N/A" and skip to Section 725.291 of the Generator checklist.**				

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No
OTH	1	X		**Section 722.134: Accumulation Time**			✓	SEE TSD CHECKLIST
				NOTE: A generator who is also a TSD would be subject to this section for any waste which is not identified for storage on the facility's Part A, or which is being accumulated outside a "permitted" storage area.				
			a1	For waste in containers, has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subpart I?				
				and/or				
				For waste in tanks, has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subpart J except Section 725.297(c) and 725.300? Yes ____ No ____				
			a2	For waste in containers, has the generator marked and made visible for inspection on each container, the date upon which accumulation began? Yes ____ No ____ N/A ____				
			a3	For waste in containers and tanks, has the generator marked or labeled each with the words "Hazardous Waste"? Yes ____ No ____				
			a4	Has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subparts C and D, and Section 725.116? Yes ____ No ____				

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
				SATELLITE ACCUMULATION				
			c1	Is the generator who accumulates hazardous waste in containers at or near any point of generation where wastes initially accumulate and which is under the control of the operator of the process generating the waste: - Limiting such accumulation to 55 gallons (one quart of acutely hazardous waste listed in 35 Ill. Adm. Code 721.133)? Yes ✓ No ___ N/A ___ - Complying with the requirements of: 1) 35 Ill. Adm. Code 725.271, Condition of Containers? Yes ✓ No ___ 2) 35 Ill. Adm. Code 725.272, Compatibility of Waste with Containers? Yes ✓ No ___ 3) 35 Ill. Adm. Code 725.273(a), Management of Containers - requiring that the containers be stored closed except when waste is being added or removed? Yes ✓ No ___ - Marking the containers with the words "Hazardous Waste" or with words that identify the contents of the containers? Yes ✓ No ___				

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.
			c2	Has the generator who accumulates more than 55 gallons (one quart of acutely hazardous waste listed in 35 Ill. Adm. Code 721.133(e)) with respect to the amount of excess waste, complied with the requirements in Section 722.134(a) within three days? Yes ____ No ____ Are the containers with the excess amounts marked with the date accumulation began? Yes ____ No ____ During the three day period, is the generator continuing to comply with the requirements of Section 722.134(c)(1)? Yes ____ No ____				NO EXCESS ACCUMULATION

IL 532-1592
LPC 258 8/87

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
				PART 722 **GENERATOR STANDARDS** **Subpart D: Recordkeeping and Reporting**				
OTH	2			**Section 722.140: Recordkeeping**	✓			
				Has the generator retained for a period of three years:				
			a	- A copy of each signed manifest? Yes ✓ No ___				
			b	- A copy of each annual report? Yes ✓ No ___				
			b	- A copy of each exception report? Yes ___ No ___ N/A ✓				NONE REQUIRED
			c	- Copies of test results, waste analyses or other determinations made in accordance with Section 722.111? Yes ✓ No ___ N/A ___				
			d	Does a generator who is involved in any unresolved enforcement action continue to maintain the records required in 722.140(a) thru (c)? Yes ___ No ___ N/A ✓				NO UNRESOLVED ENFORCEMENT ACTION
			d	If the Director has requested that the records required in 722.140(a) thru (c) be maintained for a period longer than three years, has the generator continued to maintain them? Yes ___ No ___ N/A ✓				NO REQUESTS BY DIRECTOR

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
OTH	2			**Section 722.141: Annual Reporting**	✓			
				Has the generator who ships waste off-site to a treatment, storage or disposal facility within the United States prepared and submittted a copy of an annual report, as supplied by the Agency, to the Agency by March 1 for the preceeding calendar year?				
				NOTE: A generator who treats, stores or disposes of hazardous waste on-site must also submit an annual report as a TSD in accordance with the requirements of 35 Ill. Adm. Code 702, 703, 724, 725 and 40 CFR 266.			✓	NONE REQUIRED
MAN	1			**Section 722.142: Exception Reporting**				
			a	Has the generator who has not received a signed copy of the manifest from the designated TSD within 35 days of the date the waste was accepted by the initial transporter determined the status of its hazardous waste? Yes ____ No ____				
			b	Has the generator who has not received a signed copy of the manifest from the designated TSD within 45 days of the date the waste was accepted by the original transporter submitted an exception report to the Director? Yes ____ No ____				
			b	Does any exception report submitted to the Director contain the following:				
				- A legible copy of the manifest for which the generator does not have confirmation of delivery; and				

IL 532-1592
LPC 256 6/87

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
				- A cover letter signed by the generator or his authorized representative explaining the efforts taken to locate the hazardous waste and the results of those efforts? Yes ____ No ____ N/A ____				
OTH	1			**Section 722.143: Additional Reporting**			✓	NONE REQUIRED
				Has the generator submitted all additional reports concerning quantities and disposition of wastes as required by the Director?				

IL 532-1592
LPC 256 6/87

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
OTH	1/2			**PART 722** **GENERATOR STANDARDS** **Subpart E: Exports of Hazardous Waste** **Section 722.152: General Requirements** Has the facility made any shipments of hazardous waste outside the United States? Yes ____ No ✓ **NOTE: If "No", skip Subpart E. If "Yes", answer the next question.** Has the generator complied with the requirements in Sections 722.152 through 722.157? Yes ____ No ____ **NOTE: If the answer is "No", explain in detail why the firm did not meet the requirements. Review the requirements prior to answering this question. When citing a violation of this Subpart, identify the specific section violated in the Narrative as well as in the Comments.**			✓	NO EXPORTS OF HAZARDOUS WASTE

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
MAN	1			**PART 722** **GENERATOR STANDARDS** **Subpart F: Imports of Hazardous Waste** **Section 722.160: Imports of Hazardous Waste**			✓	NO IMPORTS OF HAZARDOUS WASTE
			b1	Has the person importing hazardous waste met the manifest requirements of Section 722.120 except that: In place of the generator's name, address and USEPA identification number, the name and address of the foreign generator and the importer's name, address and USEPA identification number are used; **and**				
			b2	Has the importer or his agent signed the manifest in place of the generator; **and**				
			b2	Has the importer or his agent obtained the signature of the initial transporter? Yes ____ No ____ N/A ____				
			c	Is the person importing hazardous waste using manifests obtained from the Agency? Yes ____ No ____				

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.
OTH	2	X		**PART 722** **GENERATOR STANDARDS** **Subpart G: Farmers** **Section 722.170: Farmers** Is a farmer who is disposing of waste pesticides from his own use which are hazardous wastes: - Triple rinsing each emptied pesticide container in accordance with 35 Ill. Adm. Code 727.107(b)(3), Residues of Hazardous Waste in Empty Containers? Yes ____ No ____ N/A ____ - Disposing of pesticide residue on his own farm in a manner consistent with the disposal instructions on the pesticide label? Yes ____ No ____ N/A ____ **NOTE: If the answer to either of the preceeding questions is "No", the farmer is subject to the requirements of this Part (722) and to the applicable portions of 35 Ill. Adm. Code 702, 703 and 725 (724). Complete the applicable inspection form(s).**			✓	NO FARMING ACTIVITY

IL 532-1502
LPC 258 8/87

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No
OTH	1			**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 ✓				

IL 532-1502

Area	Class	90 Day F.U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No
OTH	1			**Section 703.151: Application by New HWM Facilities** For a new HWM facility, has the facility complied with the requirements of this section? Specifically, has the facility submitted Part A and Part B of the permit application 180 days before physical construction has commenced? Yes ____ No ____ Is the facility only operating with a RCRA permit? Yes ____ No ____ **NOTE: This violation should be cited in the CIL only after receiving approval from headquarters.**			✓	NOT A NEW FACILITY
OTH	1			**Section 703.152: Amended Part A Application** Has the owner or operator of a HWM facility with interim status filed an amended Part A permit application with the Agency: 1) No later than the effective date of revised regulations under 35 Ill. Adm. Code 721, Identification and Listing of Hazardous Waste, listing or identifying additional hazardous waste which the HWM facility is handling? Yes ✓ No ____ N/A ____ 2) As necessary to comply with the provisions of Section 703.155, Changes During Interim Status? Yes ✓ No ____ N/A ____ **NOTE: The owner or operator of a facility who fails to comply with the updating requirements of this section does not receive interim status as to the wastes not covered by duly filed Part A applications.**	✓			

Area	Class	90 Day F U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	In Apparent Compliance? No	Not Applicable	Remarks or Comment No
OTH	1			**Section 703.154: Prohibitions During Interim Status**	✓			
				During interim status, has the facility refrained from:				
			a	- Treating, storing or disposing of hazardous waste not specified in Part A of the permit application? Yes ✓ No ___				
			b	- Employing processes not specified in Part A of the permit application? Yes ✓ No ___				
			c	- Exceeding the design capacities specified in Part A of the permit application? Yes ✓ No ___				
OTH	1			**Section 703.155: Changes During Interim Status**	✓			
				NOTE: Section 703.155(a), (b) and (c) reiterate in more detail the requirement that a HWM facility submit and, in the case of (b) and (c) that the Agency approve, amendments to the Part A permit application prior to the facility conducting the activity or receiving new hazardous waste. A "No" answer to any of the questions under Section 703.154 means the facility is also in apparent non-compliance with this section.				
			d	Did the owner or operator submit a revised Part A permit application not later than 90 days prior to changes in operational control or ownership of the HWM facility? Yes ___ No ___ N/A ✓				NO CHANGE IN OPERATIONAL CONTROL OR OWNERSHIP

Area	Class	90 Day F U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No
OTH	1			**PART 725** **INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES** **Subpart A: General Provisions** **Section 725.101: Purpose, Scope and Applicability**	✓			
				Does the facility qualify for any of the exemptions under Section 725.101(c)? Yes ✓ No ___				RECLAMATION
				NOTE: If "Yes", explain in narrative.				
			d	Has the firm managed hazardous waste with the following hazardous waste numbers: F020, F021, F022, F023, F026 or F027 in compliance with the requirements of 725.101(d)? Yes ___ No ___ N/A ✓				THESE WASTES ARE NOT MANAGED AT THIS FACILITY

Area	Class	90 Day F U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No
				PART 725 **INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES** **Subpart B: General Facility Standards**				
OTH	1			**Section 725.111: USEPA Identification Number**	✓			
				Has the facility obtained a USEPA identification number?				
OTH	1			**Section 725.112: Required Notices**			✓	
			a	Has the owner or operator of a facility that has arranged to receive hazardous waste from a foreign source notified the Regional Administrator, in writing, at least four weeks in advance of the date that the waste is expected to arrive at the facility? Yes ____ No ____ N/A ✓				NO WASTE RECEIVED FROM A FOREIGN SOURCE
			b	Before transferring ownership or operation of a facility during its operating life, or of a disposal facility during the post-closure care period, did the owner or operator notify the new owner or operator, in writing, of the requirements of 35 Ill. Adm. Code 703, 703 and 725? Yes ____ No ____ N/A ✓				NO TRANSFER OF OWNERSHIP OR OPERATION
OTH	1			**Section 725.113: General Waste Analysis**	✓			
			a1	Has the owner or operator of the facility obtained a detailed chemical analysis of each waste prior to its treatment, storage or disposal? Yes ✓ No ____				

IL 532-1592
LPC 758 8/87

Area	Class	90 Day F-U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No
			a1	Does the analysis contain all the information which must be known to treat, store or dispose of the waste in accordance with this Part? Yes ✓ No ___				
			a3	Has the analysis been repeated: A) When the operator is notified or has reason to believe that the process generating the hazardous waste has changed? Yes ✓ No ___ N/A ___ B) By off-site facilities, when the results of the inspection required in Section 725.113(a)(4) indicate that the hazardous waste received at the facility does not match the waste designated on the accompanying manifest or shipping paper? Yes ✓ No ___ N/A ___				
			a4	Has the owner or operator of an off-site facility apparently inspected each hazardous waste movement received at the facility to determine whether it matches the identity of the waste specified on the accompanying manifest or shipping paper? Yes ✓ No ___ N/A ___				
			b	Has the owner or operator developed a written analysis plan? Yes ✓ No ___ **NOTE: If "No", skip to 725.114.** Is the written waste analysis plan available at the facility? Yes ✓ No ___				

IL 532-1502
LPC 250 0/87

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No
				Does the owner or operator follow the procedures in the written plan so as to comply with the requirements in Section 725.113(a)? Yes ✓ No ___				
			b	Does the plan specify: 1) The parameters for which each hazardous waste will be analyzed and the rationale for the selection of these parameters? Yes ✓ No ___ 2) The test methods which will be used to test for those parameters? Yes ✓ No ___ 3) The sampling method which will be used to obtain a representative sample of the waste to be analyzed? Yes ✓ No ___ 4) The frequency with which the initial analysis of the waste will be reviewed or repeated to ensure that the analysis is accurate and up-to-date? Yes ✓ No ___ 5) For off-site facilities, the waste analyses that hazardous waste generators have agreed to supply? Yes ✓ No ___				

IL 532-1592

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No
				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 ✓	✓			

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
				Does a non-exempt facility have either:				
			b	1) A 24-hour surveillance system which continuously monitors and controls entry into the active portion of the facility? Yes ✓ No ___				
				OR				
			b	2) An artificial or natural barrier which completely surrounds the active portion of the facility and a means to control entry at all times thru the gate(s) or other entries to the active portion of the facility? Yes ✓ No ___				
			c	Does a non-exempt facility have a sign, legible from a distance of at least 25 feet, with the words "Danger - Unauthorized Personnel Keep Out" at each entrance to the active portion of the facility and at other locations in sufficient numbers to be seen from any approach to the active portion? Yes ✓ No ___				
				NOTE: Existing signs with legends other than the one above may be used if the legend on the sign indicates only authorized personnel are allowed to enter the active portion and that entry onto the active portion can be dangerous.				

Area	Class	90 Day F U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No
OTH	2			**Section 725.115: General Inspection Requirements**	✓			
			a	Does the owner or operator inspect the facility for malfunctions, deterioration, operator errors and discharges which are causing or may lead to: 1) Release of hazardous waste or hazardous waste constituents to the environment; or a threat to human health? Yes ✓ No ___				
			a	Does the owner or operator conduct these inspections often enough to identify problems in time to correct them before they harm human health or the environment? Yes ✓ No ___				
			b1	Has the owner or operator developed a written schedule for inspecting all monitoring equipment, safety and emergency equipment, security devices and operating and structural equipment important to preventing, detecting or responding to environmental or human health hazards? Yes ✓ No ___				
			b2	Is the written schedule at the facility? Yes ✓ No ___				
			b3	Does the schedule identify the types of problems which are to be looked for during the inspection? Yes ✓ No ___				
			b4	Does the schedule specify at least the following minimum inspection frequency: - Daily inspections of areas subject to spills? Yes ✓ No ___				

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
				- 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 ___				
			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 ___				
			d	Does the inspection record include: - The date and time of the inspection? Yes ✓ No ___ - The name of the inspector? Yes ✓ No ___				

IL 532-1502

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No
				- A notation of the observations made? Yes ✓ No ___				
				- The date and nature of any type of corrective action? Yes ✓ No ___ N/A ___				
OTH	2			**Section 725.116: Personnel Training**	✓			
				Does the facility have a training program? Yes ✓ No ___				
				NOTE: If "No", skip to Section 725.117, Page TSD-B-10.				
			a1	Have facility personnel who are involved with hazardous waste management successfully completed a program of classroom or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the requirements of this Part? Yes ✓ No ___				
				Is the training program formalized, i.e., written down? Yes ✓ No ___				
			a2	Is the program directed by a person who has been trained in hazardous waste management procedures? Yes ✓ No ___				
			a3	Does the program cover, at a minimum:				
				A) Procedures for using, inspecting, repairing and replacing facility emergency and monitoring equipment? Yes ✓ No ___ N/A ___				

IL 532-1592
LPC 756 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) 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 ___				
				E) Response to ground water contamination incidents? Yes ✓ No ___ N/A ___				
				Does the program cover the implementation of the contingency plan? Yes ✓ No ___				
			b	Have new employees completed the program within six months of the date of employment or assignment to a position requiring them to manage hazardous waste? Yes ✓ No ___ N/A ___				
			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 ___				

11 532-1592

Area	Class	90 Day F U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No
				2) A written job description for each job position above, to include the requisite skill, education or other qualifications and duties of personnel assigned to each position? Yes ✓ No ___				
				3) A written description of the type and amount of both initial and continuing training that will be given to each person holding a position dealing with hazardous waste management? Yes ✓ No ___				
				4) Records to document that the training or job experience have been given to and completed by personnel dealing with hazardous waste management? Yes ✓ No ___				
			e	Is the facility maintaining training records of former employees who were involved in hazardous waste management for a period of at least three years? Yes ✓ No ___ N/A ___				
OTH	1	X		**Section 725.117: General Requirements for Ignitable, Reactive or Incompatible Wastes**	✓			
			a	Are ignitable and reactive wastes protected from and separated from sources of ignition and reaction? Yes ✓ No ___				
			a	Are smoking and open flames restricted to specially designated areas when ignitable or reactive waste is being handled? Yes ✓ No ___				

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No
			a	Are "No Smoking" signs posted whenever there is a hazard from ignitable or reactive waste? Yes ✓ No ___				
			b	Is the treatment, storage or disposal of ignitable or reactive waste and the mixture or comingling of incompatible wastes and materials being done so that it does not: 1) Generate extreme heat or pressure, fire, or explosion or violent reaction? Yes ✓ No ___ 2) Produce uncontrolled toxic mists, fumes, dusts or gases in sufficient quantities to threaten human health? Yes ✓ No ___ 3) Produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosion? Yes ✓ No ___ 4) Damage the structural integrity of the device or facility containing the waste? Yes ✓ No ___ 5) Through other like means threaten human health or the environment? Yes ✓ No ___				

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.**			✓	

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
				PART 725 **INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES** **Subpart C: Preparedness and Prevention**				
OTH	1	X		**Section 725.131: Maintenance and Operation of Facility** Is the facility being maintained and operated to minimize the possibility of a fire, explosion or any unplanned and sudden or non-sudden release of hazardous waste or hazardous waste constituents to: - Air; - Soil; or - Surface water, which would threaten human health or the environment? Yes ✓ No ___	✓			
OTH	1	X		**Section 725.132: Required Equipment** Is the facility equipped with the following, unless none of the hazards posed by waste handled at the facility could require a particular kind of equipment:	✓			
			a	- An internal communications or alarm system capable of providing immediate emergency instructions? Yes ✓ No ___ N/A ___				
			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 ___				

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.**	✓			

IL 532-1502

Area	Class	90 Day F.U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
OTH	1	X		**Section 725.134: 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 ✓				THERE IS NEVER ONLY ONE EMPLOYEE ON THE PREMISES DURING OPERATING HOURS
OTH	1	X		**Section 725.135: Required Aisle Space**	✓			
				Is the owner or operator maintaining sufficient aisle space to allow the unobstructed movement of personnel, fire equipment and decontamination equipment to any area of the facility?				
OTH	2			**Section 725.137: Arrangements with Local Authorities**	✓			
			a	Has the owner or operator made or attempted to make the following arrangements as appropriate for the type of waste handled at his facility and the potential need for the services of these organizations:				

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
				1) Arrangements to familiarize police and fire departments and emergency response teams with the layout of the facility, properties of hazardous wastes handled at the facility and associated hazards, places where personnel would normally be working, entrances to roads inside the facility and possible evacuation routes? Yes ✓ No ___ N/A ___				
				2) Where more than one police or fire department might respond to an emergency, has one been designated as the primary emergency authority with the others agreeing to provide support to the primary emergency authority? Yes ___ No ___ N/A ✓				CHICAGO POLICE AND FIRE DEPARTMENTS WOULD RESPOND
				3) Agreements with State emergency response teams, emergency response contractors and equipment suppliers? Yes ✓ No ___ N/A ___				
				4) Arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illnesses which could result from fires, explosions or releases at the facility? Yes ✓ No ___ N/A ___				
				NOTE: Any "N/A" answer must be explained in the Comments.				
			b	Has the owner or operator documented, in the operating record, refusal of State or local authorities to enter into any or all of the above arrangements? Yes ___ No ___ N/A ✓				NO REFUSALS

IL 532-1592
LPC 7[illegible] 5/87

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 D: Contingency Plan and Emergency Procedures**				
OTH	1			**Section 725.151: Purpose and Implementation of Contingency Plan**	✓			
			a	Is a plan available? Yes ✓ No ___				
				NOTE: If the answer is "No", skip to 725.155.				
			a	Is the plan designed to minimize hazards to human health or the environment from fires, explosions or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface waters? Yes ✓ No ___				
			b	Have the provisions of the plan been carried out immediately whenever there was a fire, explosion or release of hazardous waste constituents which could threaten human health or the environment? Yes ___ No ___ N/A ✓				NO SUCH INCIDENTS HAVE OCCURRED
OTH	2			**Section 725.152: Content of Contingency Plan**	✓			
			a	Does the plan describe the actions facility personnel must take to comply with Sections 725.151 and 725.156 in response to: 1) Fires? Yes ✓ No ___ 2) Explosions? Yes ✓ No ___				

IL 532-1592

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
				3) Unplanned sudden or non-sudden releases of hazardous waste or hazardous waste constituents to air, soil, or surface water? Yes ✓ No ___				
			c	Does the plan describe the arrangements agreed to by:				
				1) Local police and fire departments? Yes ✓ No ___				RUSH PRESBYTERIAN-ST LUKE'S HOSPITAL
				2) Hospitals? Yes ✓ No ___				
				3) Contractors? Yes ✓ No ___				
				4) State and local emergency response teams? Yes ✓ No ___				
			d	Does the plan list the names, addresses and phone numbers (office and home) of all personnel qualified to act as emergency coordinators? Yes ✓ No ___				
			d	Is the list of emergency coordinators up-to-date? Yes ✓ No ___				
			d	If more than one person is designated as an emergency coordinator is a primary coordinator designated? Yes ✓ No ___				
			e	Does the plan identify:				
				1) A list and physical description of all emergency equipment at the facility? Yes ✓ No ___				

IL 532-1592
IDPH 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.
				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 ___				

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	In Apparent Compliance? No	Not Applicable	Remarks or Comment No
OTH	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 ____ N/A ✓				
			b	2) The plan fails in an emergency? Yes ____ No ____ N/A ✓				NO SUCH INCIDENTS HAVE OCCURRED
			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**	✓			
				Is there an emergency coordinator on-site or on-call at all times? Yes ✓ No ____				

IL 532-1502
LPC 750 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 ✓ **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 532-1592
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
MAN	1			**PART 725** **INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES** **Subpart E: Manifest System, Recordkeeping and Reporting** **Section 725.171: Use of Manifest System** Does the facility accept waste from off-site? Yes ✓ No ____ **NOTE: If the answer is "Yes", complete this section. If the answer is "No", check "N/A" and skip to 725.173.** For each manifest reviewed, did the facility:	✓			
			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 532-1592
LPC 256 6/87

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No
			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 ✓				NO SHIPMENTS BY WATER OR RAIL
				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
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	2			**Section 725.173: Operating Record**	✓			
			a	Does the owner or operator have a written operating record at the facility? Yes ✓ No ___				
			b	Is the information in the operating record being maintained until closure of the facility? Yes ✓ No ___				
			b	Does the operating record contain the following information: 1) A description of and quantity of each hazardous waste received at the TSD facility (whether from on or off-site generation)? Yes ✓ No ___ 2) A record of the method(s) and date(s) of its treatment, storage, or disposal as required by Appendix I? Yes ✓ No ___ 3) The location of each hazardous waste within the facility? Yes ✓ No ___ 4) The quantity of each hazardous waste at each location within the facility? Yes ✓ No ___ 5) For disposal facilities, a map recording the location and quantity of hazardous waste in each cell or disposal area? Yes ___ No ___ N/A ✓				NOT A DISPOSAL FACILITY

IL 532-1592
IDPH 750 8/82

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No
				6) A cross reference by manifest number to location and quantity of hazardous waste? Yes ✓ No ___ N/A ___				
				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 Imp~~rove~~ound ments)? Yes ___ No ___ N/A ✓ - 725.352 (Waste Piles)? Yes ___ No ___ N/A ✓ - 725.373 (Land Treatment)? Yes ___ No ___ N/A ✓ - 725.441 (Incinerators)? Yes ___ No ___ N/A ✓ - 725.475 (Thermal Treatment)? Yes ___ No ___ N/A ✓ - 725.502 (Chem., Phys., Bio. Treatment)? Yes ___ No ___ N/A ✓				
				8) Summary reports and details of all incidents that require the implementation of the contingency plan as specified in Section 725.156(j)? Yes ___ No ___ N/A ✓				NO REPORTS NECESSARY

IL 532-1502
LPC 258 6/87

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
				9) Records and results of inspections as required by Section 725.115(d)? Yes ✓ No ____ **NOTE: The above information on inspection records need only be kept for three years. This period would automatically be extended during any unresolved enforcement action.**				
				10) Monitoring, testing or analytical data where required by Sections: - 725.190 (G.W. Monitoring)? Yes ____ No ____ N/A ✓ - 725.194 (G.W. Monitoring)? Yes ____ No ____ N/A ✓ - 725.376 (Land Treatment)? Yes ____ No ____ N/A ✓ - 725.378 (Land Treatment)? Yes ____ No ____ N/A ✓ - 735.380(d)(1) (Land Treatment)? Yes ____ No ____ N/A ✓ - 725.447 (Incinerators)? Yes ____ No ____ N/A ✓ - 725.477 (Thermal Treatment)? Yes ____ No ____ N/A ✓ **NOTE: Data required under 725.194 must be kept throughout the post-closure period.**				THESE DATA NOT REQUIRED

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.
				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 ✓				NOT A DISPOSAL FACILITY
OTH	2			**Section 725.174: Availability, Retention and Disposition of Records**	✓			
			a	During the inspection, were all records including plans required under this Part furnished upon request and made available at all reasonable times for inspection as required by this Section? Yes ✓ No ___ N/A ___				
			c	Upon closure of a waste disposal facility did the owner or operator submit a copy of the record of waste disposal location(s) and quantities to:				NOT A DISPOSAL FACILITY
				- 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 ✓				NO UNRESOLVED ENFORCEMENT ACTION OR REQUESTS BY DIRECTOR

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	In Apparent Compliance? No	Not Applicable	Remarks or Comment No.
OTH	2			**Section 725.175: Annual Report** Has the owner or operator prepared and submitted a copy of a facility annual report, supplied by the Agency, to the Agency by March 1 of each year for the preceding calendar year?	✓			
OTH	1			**Section 725.176: Unmanifested Waste Report** Does the facility accept hazardous waste from off-site? Yes ✓ No ____ **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 ____ N/A ✓ **NOTE: If the answer to both the above questions is "Yes", check "N/A". If the answer to the first question is "Yes" and the second "No", answer the following questions:** Did the owner or operator complete an unmanifested waste report to include the information required in Section 725.176(a) thru (g)? Yes ____ No ____			✓	NO HAZARDOUS WASTE ACCEPTED WITHOUT MANIFESTS

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**			✓	NONE REQUIRED
				Has the owner or operator submitted to the Agency, as required, reports concerning:				
			a	1) Releases, fires, explosions as specified in Section 725.156? Yes ____ No ____ N/A ✓				
			b	2) Groundwater contamination and monitoring data as specified in Sections 725.193 and 725.194? Yes ____ No ____ N/A ✓				
			c	3) Facility closure as specified in Section 725.215? Yes ____ No ____ N/A ✓				

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
CLO	1			**PART 725** **INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES** **Subparts G and H: Closure, Post-Closure and Financial Requirements**				
				Section 725.212: Closure Plan	✓			
			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 ___				SUBMITTED WITH PART B PERMIT APPLICATION
				- 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 532-1592

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**			✓	NOT A DISPOSAL FACILITY
			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**			✓	NOT A DISPOSAL FACILITY
				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".				

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?				
OTH	1	X		**Section 725.272: Compatibility of Waste with Containers**	✓			
				Is the owner or operator using containers made of or lined with materials which will not react with and are otherwise compatible with the hazardous waste to be stored so that the ability of the container to contain the waste is not impaired?				
OTH	1	X		**Section 725.273: Management of Containers**	✓			
			a	Are containers of hazardous waste always closed during storage? Yes ✓ No ___				
			b	Are containers of hazardous waste being opened, handled or stored in manner which will prevent the rupture of the container or prevent it from leaking? Yes ✓ No ___				
OTH	2			**Section 725.274: Inspections**	✓			
				Is the owner or operator inspecting areas where the containers are stored at least weekly, looking for leaks and for deterioration caused by corrosion or other factors? Yes ✓ No ___				

IL 532-1592

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?	✓			
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 WASTES

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		a	**PART 725** **INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES** **Subpart J: Tank Systems** **Section 725.290: Applicability** Does the facility store or treat hazardous waste in tanks? Yes ✓ No ___ If "No", skip Subpart J. **NOTE: Tanks or sump pits that serve as part of a secondary containment system to collect or contain releases are not subject to Subpart J requirements.** Will the waste stored in the tanks fail the filter test and are the tanks located inside a building with an impermeable floor? Yes ___ No ___ → **NOTE: Failing the filter test means that the waste contains free liquids.** **Section 725.291: Assessment of Existing Tank Systems** For tanks not protected by a secondary containment system, is an independent, certified written assessment available? Yes ✓ No ___ **NOTE: Except as provided in Subsection (c) of 725.291, certified assessment must be available by 1/12/88.**	✓			LIQUID WASTES STORED IN ABOVE GROUND TANKS LOCATED OUTSIDE

IL 532-1592

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No
			b	Does this assessment consider at least the following: 1) available standards for the tank and ancillary equipment; 2) hazardous characteristics of the wastes; 3) existing corrosion protection measures; 4) age of the tank system; and 5) results of a leak test, internal inspection, or other tank integrity examination? Yes ✓ No ___	✓			
OTH	1			**Section 725.292: Design and Installation of New Tank Systems or Components**				
			a	For new tanks (built after July 14, 1986) was an independent, certified written assessment prepared? Yes ✓ No ___ Does the assessment include, at a minimum, the following: 1) design standards for tanks and ancillary equipment; **NOTE: These standards should include protection from damage from vehicular traffic, adequate foundations, anchoring to prevent flotation or dislodgement, and withstanding the effects of frost heave.** 2) hazardous characteristics of the waste; and 3) evaluation of potential for corrosion and corrosion protection measures? Yes ✓ No ___				

IL 532-1592

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
OTH			g	Has the owner obtained and kept on file at the facility the certifications of the design and installation requirements of Subsections (b) through (f)? Yes ✓ No ___	✓			
				Section 725.293: Containment and Detection of Releases				
			a1	Is secondary containment provided for any new tank system (constructed after 7/14/86) before being put into service? Yes ✓ No ___ N/A ___				
			a2	Does an existing tank, which stores F020, F021, F022, F023, F026 or F027 waste(s) have secondary containment (secondary containment is required by January 12, 1989)? Yes ___ No ___ N/A ✓				THESE WASTES ARE NOT STORED AT THIS FACILITY
			a3	For an existing tank, of known age, which stores any hazardous waste, is secondary containment provided (secondary containment is required by January 12, 1989 or when the tank is 15 years old, whichever is later)? Yes ✓ No ___ N/A ___				
			a4	For an existing tank of unknown age, has secondary containment been provided by January 12, 1995? Yes ___ No ___ N/A ✓				
				or				
				If the facility is older than 7 years, by the time the facility reaches 15 years of age or January 12, 1989, whichever is later? Yes ___ No ___ N/A ✓				
			a5	For tanks that store wastes that are listed as hazardous after 1/12/87, has secondary containment been provided on the same basis as required in Subsections (a)(1) through (a)(4) of 725.293 substituting the date that a material becomes a hazardous waste for 1/12/87? Yes ___ No ___ N/A ✓				

IL 532-1592

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
			b1&2	Is the secondary containment system designed, installed and operated to prevent migration of wastes out of the system, and capable of detecting and collecting releases? Yes ✓ No ____ N/A ____ **NOTE: To meet the requirements of Subsection (b) secondary containment must comply with the physical requirements given in Subsection (c)(1) through (4) (compatible liner, foundation, leak detection system).**				
			c4	Is spilled or leaked wastes and accumulated precipitation removed from the secondary containment within 24 hours? Yes ✓ No ____ N/A ____ **NOTE: A RCRA permit may allow for removal of liquids less frequently than 24 hours after accumulation.**				
			d	Does the secondary containment have one or more of the following: 1) a liner (external to the tank); or 2) a vault; or 3) a double-walled tank; or 4) an equivalent device (approved by the Board)? Yes ✓ No ____ N/A ____ **NOTE: Liners, vaults or double-walled tanks must also comply with the requirements of Section 725.293, Subsection (e) or "No" should be marked and explained in the comment.**				
			f	Is ancillary equipment protected by secondary containment that meets the requirement of Subsections (h) and (c) except for:				

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No
	-			1) above ground piping (exclusive of flanges, joints, valves and connections) that are inspected daily;				
				2) welded flanges, joints and connections that are inspected daily;				
				3) sealless or magnetic coupling pumps that are inspected daily; and				
				4) pressurized above ground piping systems with automatic shut-off devices that are inspected daily? Yes ✓ No ___ N/A ___				
			i	Until such time as secondary containment is provided, are the following requirements being met for all tank systems:				
				1) For non-enterable underground tanks, has a yearly leak test that meets the requirements of 725.291(b) been conducted? Yes ___ No ___ N/A ✓				NO UNDERGROUND TANKS
				2) For enterable underground tanks and ancillary equipment, has a yearly leak test or an internal inspection or other tank integrity examination by an independent registered professional engineer been conducted? Yes ___ No ___ N/A ✓				
				3) Are written records maintained at the facility to document the assessments required under Subsections (i)(1) and (2)? Yes ___ No ___ N/A ✓				

TL 532 1592

Area	Class	90 Day F-U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
OTH	1	X		**Section 725.294: General Operating Requirements**	✓			
			b1&2	Are tanks equipped with spill prevention controls (e.g., check valves, dry disconnect couplings) and overfill prevention controls (e.g., level sensing devices, high level alarms, automatic feed cutoff or bypass to a standby tank)? Yes ✓ No ___				
			b3	Is a sufficient freeboard being maintained in uncovered tanks to prevent overtopping by wave or wind action or by precipitation? Yes ___ No ___ N/A ✓				NO UNCOVERED TANKS
			c	If a leak or spill has occurred in the tank system, has the owner or operator complied with the requirements of 725.296? Yes ___ No ___ N/A ✓				NO LEAKS OR SPILLS
OTH	2			**Section 725.295: Inspections**	✓			
			c	Is the facility operator inspecting and documenting, in an operating record, the results of tank inspection as required in 725.295, Subsections (a) and (b)? Yes ✓ No ___				
OTH	1	X		**Section 725.296: Response to Leaks or Spills and Disposition of Tank Systems**			✓	NO LEAKS OR SPILLS
				Does the facility have a tank system or secondary containment system from which there has been a leak or spill, or which is unfit for use? Yes ___ No ✓				
				NOTE: If "No", skip to Section 725.297. If "Yes", answer the following questions. If there is a violation of the requirements in this section, there is also a violation of Section 725.294(c).				

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
				If a tank or secondary containment system has leaked, has the owner done the following:				
			a	1) Ceased using, stopped inflow of wastes? Yes ____ No ____				
			b	2) Removed the waste from the tank system within 24 hours and/or from the secondary containment system within 24 hours? Yes ____ No ____				
				3) Taken actions to prevent waste migration and removed and properly disposed of visibly contaminated soil or subsurface water? Yes ____ No ____				
			d	4) Reported to the Agency within 24 hours of detection? Yes ____ No ____				
				NOTE: Reporting to the Agency is not necessary if less than one pound of material which was immediately contained and cleaned up was spilled.				
				5) Within 30 days of detection of a release, submitted a report to the Agency that complies with Section 725.296(d)(3)(A) through (E)? Yes ____ No ____				
			e4	If the source of the release was from a component of a tank system without secondary containment, has the owner provided secondary containment (that satisfies 725.293) to the component of the system before it is returned to service? Yes ____ No ____ N/A ____				
				NOTE: If the component is above ground and can be visually inspected then secondary containment is not needed.				

Area	Class	90 Day F U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No
			f	Certification of major repairs. If an extensive repair has been done, then is a certification by an independent, registered professional engineer, that the repaired system is capable of handling hazardous waste available before the tank is returned to service? Yes ____ No ____ N/A ____ Has the certification been submitted within 7 days after returning the tank system to use? Yes ____ No ____ N/A ____				
CLO	1			**Section 725.297: Closure and Post Closure Care**	✓			
				NOTE: The requirements of this section apply to closure of tank systems. If no closure is being performed, then skip to Section 725.298.				FACILITY IS CURRENTLY GOING THROUGH CLOSURE FOR TANKS #190-#193
			a	At the time of closure, has the owner removed or decontaminated all waste residues, contaminated components, contaminated soils and structures and equipment and managed them as hazardous waste (unless 721.103(d) applies)? Yes ____ No ____				WAITING FOR CERTIFICATION BY ENGINEER (TANKS HAVE BEEN DECONTAMINATED + REMOVED)
			a	Has the closure plan, closure activities, cost estimates for closure and financial responsiblity for tank systems met all requirements specified in Subparts G and H? Yes ____ No ____				
			b	If contaminated soils are not removed, then has the tank system performed closure and post closure care in accordance with requirements applicable to landfills (Section 725.410)? Yes ____ No ____				
				NOTE: Such a tank system is considered a "Landfill" and shall meet all of the requirements of landfills specified in Subparts G and H.				

Area	Class	90 Day F U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No
OTH	1			**Section 725.298: Special Requirements for Ignitable or Reactive Wastes**	✓			
				Are ignitable or reactive wastes stored in tanks? Yes ✓ No ___				
				NOTE: If "No", skip to Section 725.299.				
			a	If ignitable or reactive wastes are stored or treated in tanks, then is it in such a way that the waste is protected from material or conditions that may cause it to ignite or react? Yes ✓ No ___				
				NOTE: Tank systems used solely for emergencies may store ignitable/reactive wastes.				
			b	Are there proper protective distances between the waste management area and the facility boundary line? Yes ✓ No ___				
OTH	1			**Section 725.299: Special Requirements for Incompatible Wastes**			✓	NO INCOMPATIBLE WASTES
				Is Section 725.117 being complied with whenever incompatible wastes are stored in the same tank system or in a tank system which has not been decontaminated? Yes ___ No ___ N/A ✓				

IL 532-1597

Area	Class	90 Day F U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No
OTH	1			**Section 725.300: Waste Analysis and Trial Tests**			✓	NO SIGNIFICANTLY DIFFERENT WASTES ARE STORED IN TANKS
				In addition to complying with 725.113, whenever a tank is used to treat chemically or to store a hazardous waste that is substantially different than that waste previously stored, or to treat chemically a hazardous waste with a substantially different process, then has the owner:				
			a	1) Conducted a waste analysis and trial treatment or storage tests? Yes ____ No ____ N/A ____				
				or				
			b	2) Obtained written, documented information to show that the proposed treatment or storage will meet the requirements of 725.294(a)? Yes ____ No ____ N/A ____				
				NOTE: Section 725.301: Generators of 100 to 1000 kg/mo. is included in the checklist for Reduced Requirement Generators.				

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.
				PART 726 **STANDARDS FOR THE MANAGEMENT OF SPECIFIC HAZARDOUS WASTE AND SPECIAL TYPES OF HAZARDOUS WASTE MANAGEMENT FACILITIES** **Subpart D: Hazardous Waste Burned for Energy Recovery** **NOTE: Facilities that burn hazardous waste for energy recovery (excluding Subpart O incinerators) are subject to this subpart. However, used oil which has a hazardous characteristic is not regulated under Subpart D, but rather Subpart E. Materials identified in 721.104 and 721.106(a)(3)(E) through (I), and hazardous waste subject to 721.105 (SQG) are exempt from this subpart.**				
OTH		X		**Section 726.132: Standards Applicable to Generators of Hazardous Waste Fuel**	✓			
	I		a	Is the generator in compliance with 722 requirements (complete and attach the GEN or RR GEN checklist)? Yes ✓ No ___ N/A ___				
OTH				**Section 726.133: Standards Applicable to Transporters of Hazardous Waste Fuel**			✓	NOT A TRANSPORTER
	I			Is the transporter in compliance with 723 requirements (complete and attach the TR checklist)? Yes ___ No ___ N/A ✓				
OTH		X		**Section 726.134: Standards Applicable to Marketers of Hazardous Waste Fuel**	✓			
OTH	II		a	Is the marketer marketing hazardous waste fuel only to persons who have notified USEPA of their hazardous waste fuel activities and have obtained a USEPA identification number? Yes ✓ No ___ N/A ___				
				and				

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.
				If the fuel is burned, only to persons who burn the fuel in boilers or industrial furnaces identified in 726.131(b)? Yes ✓ No ___ N/A ___				CEMENT KILNS
	II		b	Has the marketer notified USEPA of its hazardous waste fuel activities (even if the marketer has previously notified USEPA of its other hazardous waste activities and has obtained a USEPA identification number)? Yes ✓ No ___ N/A ___				
	I		c	Is the marketer in compliance with 702, 703, 722.134, 724 Subparts A through L, and 725 Subparts A through L (complete and attach the necessary checklist(s) PER, TSD, etc.)? Yes ✓ No ___ N/A ___				
	I		d	For off-site shipments, is the marketer in compliance with 722 (complete and attach the GEN checklist)? Yes ✓ No ___ N/A ___				
	II		e	Required Notices. Has the marketer obtained a notice from the receiver of the hazardous waste fuel (a burner or subsequent marketer) that they have: notified USEPA (3010 RCRA), re-notified USEPA of waste-as-fuel activity, and if the waste fuel is to be burned, that it is burned only in an industrial furnace or boiler per 726.131(b). Yes ✓ No ___ N/A ___				
	II		e	Before accepting hazardous waste fuel, has the receiver (buyer) provided notices to the seller as outlined in the previous question? Yes ✓ No ___ N/A ___				
	II		f	Has the marketer kept a copy of each certification, sent or received, for three years? Yes ✓ No ___ N/A ___				

IL 532-1592

Area	Class	90 Day F U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
OTH				**Section 726.135: Standards Applicable to Burners of Hazardous Waste Fuel**			✓	FACILITY DOES NOT BURN HAZARDOUS WASTE FUEL
	I		a	Is the owner of an industrial furnace or boiler complying with the prohibitions in Section 726.131(b)? Yes ___ No ___ N/A ___				
	II		b	Has the USEPA been re-notified as to the burner's hazardous waste fuel activities? Yes ___ No ___ N/A ___				
	I		c	Does the burner accumulate/store hazardous waste fuel for a time period exceeding 90 days? Yes ___ No ___				
				NOTE: If "Yes", then the facility is subject to 702, 703, and 725 A through L (or 724 A through L for new facilities) and the appropriate checklist(s) must be completed. If "No", the facility must comply with 722.134 Accumulation Time.				
	I		c	Is the facility in compliance with 722.134? Yes ___ No ___ N/A ___				
	II		d	Prior to receiving the first shipment of hazardous waste fuel from a marketer, has the owner or operator of the industrial furnace or boiler provided the certification required in Sec. 726.135(d)? Yes ___ No ___ N/A ___				
	II		e	Has the burner kept a copy, for three years, of each certification notice that was sent to the marketers? Yes ___ No ___ N/A ___				

GEN/TSD/TRANS

RCRA LAND DISPOSAL RESTRICTIONS INSPECTION

I. General Information

Facility: SAFETY-KLEEN CORP. CHICAGO RC

U.S. EPA ID No.: ILD005450697 0316000053

Street: 1445 WEST 42ND STREET

City: CHICAGO State: ILL. Zip: 60609

Telephone: (312) 247-2828

Inspection Date: 1/17/92 Time: 9:15am-12:45 (am/pm)

Weather Conditions: 20°

	Name	Agency/Title	Telephone
Inspectors:	DONNA CZECH	IEPA/EPS	(708) 531-5900
Facility Representatives:	ALFRED AGHAEPOUR	FACILITY MGR.	(312) 247-2828

See Appendix B to determine which of the following LDR waste categories the facility manages:

	Generate	Transport	Treat	Store	Dispose
F001-F005 Solvents	✓		✓	✓	
F020-F023 and F026-F028					
California List*	✓		✓	✓	
First Third [40 CFR 268.10]					
Second Third [40 CFR 268.11]					
Third Third [40 CFR 268.12]	✓		✓	✓	

* See Appendix A

RECEIVED
20 FEB 1992
IEPA/DLPC

INSPECTION SUMMARY

Processes That Generate LDR Wastes:

DISTILLATION UNIT

FRACTIONATION UNITS

LIQUID-LIQUID EXTRACTION UNITS

WASTEWATER TREATMENT UNIT
FILTERING

TREATMENT RESIDUALS ARE PUT BACK INTO THE SOLVENT RECOVERY PROCESS IF POSSIBLE; EVENTUALLY THESE RESIDUALS ARE SENT OFFSITE FOR TREATMENT OR INCINERATION.

LDR Waste Management:

WASTE STREAMS (GENERALLY SPENT SOLVENTS) FROM OFF-SITE FACILITIES ARE STORED IN TANKS AND IN CONTAINERS.

WASTE STREAMS GENERATED ON SITE ARE ALSO STORED IN TANKS AND IN CONTAINERS.

Summary:

THE FACILITY APPEARED TO BE OPERATING IN COMPLIANCE WITH LAND DISPOSAL RESTRICTION REGULATIONS.

Signature: Donna J. Czech

RCRA LAND DISPOSAL RESTRICTIONS INSPECTION

II. WASTE IDENTIFICATION

A. List waste codes which the facility handles in each of the following LDR categories*:

1. F001 through F005 spent solvents:
   F001, F002, F003, F005

2. F020-F023 and F026-F028 dioxin-containing wastes:
   _____

3. California List Wastes (See Appendix A):
   SPENT SOLVENTS

4. First Third Wastes [40 CFR 268.10]:
   _____

5. Second Third Wastes [40 CFR 268.11]:
   _____

6. Third Third Wastes [40 CFR 268.12]**:
   D001

*See Appendix B.
** Note: Effective 09/25/90, large quantity generators and TSDs are required to use the toxicity characteristic leaching procedure (TCLP) instead of the extraction procedure (EP) for determining the toxicity characteristic (TC). Small quantity generators must comply with this new requirement by 03/29/91. Wastes which exhibit TC, but do not exhibit EP, will be considered "newly identified" wastes. They will be regulated under 40 CFR Part 268 only after they are evaluated by U.S. EPA, even if they are characteristic for a constituent previously covered under the EP toxicity characteristic [55 FR 22531].

B. Waste Code Determination

1. Have all wastes been correctly identified for purposes of compliance with 40 CFR Part 268?*

   Yes ✓ No___

   If no, list below:

Assigned Classification	Correct Classification
_____	_____
_____	_____
_____	_____
_____	_____

*Areas of concern include: California List/waste categories with more stringent treatment standards; listed/characteristic; multi-source/single-source leachate; P and U waste codes/F and K wastes; and waste code carry through principle.

Comments: _____

2. Have both the listed and characteristic waste code been assigned, where a listed waste exhibits a characteristic? [40 CFR 268.9(a)]

Yes ✓ No ___ NA ___

Comments ___

3. Has multi-source leachate been assigned the F039 waste code?* [40 CFR 261.31]

Yes ___ No ___ NA ✓

*Leachate derived exclusively from F020-F023 and/or F026-F028 dioxin wastes retains the individual waste codes.

If yes, was single-source leachate combined to form multi-source leachate? [55 FR 22623]

Yes ___ No ___

Comments ___

C. Does the facility handle the following wastes (national capacity variances)?

1. F001-F005 contaminated soil and debris resulting from a CERCLA response action or a RCRA corrective action (expires - 11/08/90). [40 CFR 268.30(c)]

Yes ___ No ✓ List ___

2. Dioxin contaminated soil and debris resulting from a CERCLA response action or a RCRA corrective action (expires - 11/08/90). [40 CFR 268.31(b)]

Yes ___ No ✓ List ___

3. California list contaminated soil and debris resulting from a CERCLA response action or a RCRA corrective action (expires - 11/08/90). [40 CFR 268.32(d)(2)]

Yes ___ No ✓ List ___

4. K048-K052 petroleum wastes (nonwastewaters; expires - 11/08/90). [40 CFR 268.35 (b)]

Yes ___ No ✓ List ___

5. Soil and debris contaminated with wastes that had treatment standards based on incineration set in the Second Third rule - F010, F024, K009, K010, K011, K013, K014, K023, K027, K028, K029, K038, K039, K040, K043, K093, K094, K095, K096, K113, K114, K115, K116, P039, P040, P041, P043, P044, P062, P071, P085, P089, P094, P097, P109, P111, U028, U058, U069, U087, U088, U102, U107, U190, U221, U223, U235 (expires - 06/08/91). [40 CFR 268.34(d)]

Yes ___ No ✓ List ___

6. Soil and debris contaminated with wastes that had treatment standards set in the Third Third rule based on incineration, mercury retorting, or vitrification. See Appendix A. (expires - 05/08/92). [40 CFR 268.35(e)]

Yes ___ No ✓ List _____

7. The following nonwastewaters - F039, K031, K084, K101, K102, K106, P010, P011, P012, P036, P038, P065, P087, P092, U136, U151. (expires -05/08/92). [40 CFR 268.35(c)]

Yes ___ No ✓ List _____

8. The following wastes identified as hazardous based on a characteristic alone: D004 (nonwastewaters), D008 (lead materials stored before secondary smelting), D009 (nonwastewaters) (expires - 05/08/92). [40 CFR 268.35(c)]

Yes ___ No ✓ List _____

9. Inorganic solid debris as defined in 40 CFR 268.2(g)*; includes chromium refactory bricks carrying EPA Hazardous Waste Nos. K048-K052 (expires - 05/08/92). [40 CFR 268.35(c)]

Yes ___ No ✓ List _____

*Note: Incorrect reference [40 CFR 268.2(a)(7)] in Third Third rule.

10. RCRA hazardous wastes that contain naturally occurring radioactive materials (expires - 05/08/92). [40 CFR 268.35(c)]

Yes ___ No ✓ List _____

11. Wastes listed in 40 CFR 268.10, 268.11, and 268.12 that are mixed radioactive/hazardous wastes (expires - 05/08/92)*. [40 CFR 268.35(d)]

Yes ___ No ✓ List _____

*Note: 40 CFR 268.10 and 268.11 wastes incorrectly omitted from this variance in the Third Third rule.

RCRA LAND DISPOSAL RESTRICTION INSPECTION

III. GENERATOR REQUIREMENTS

A. Treatability Group/Treatment Standard Identification*

*Note: This information is generally available on LDR notifications. If not, waste profile data and other documentation should be checked.

1. F001-F005 Spent Solvent Wastes: Does the generator correctly determine the appropriate treatability group/treatment standard for each F-solvent?

Yes ✓ No ___ NA ___

If available, list each waste code and check the correct treatability group.

Waste Code	Wastewater*	Nonwastewater
F001	___	✓
F002	___	✓
F003	___	✓
F005		✓

*Less than 1% by weight total organic carbon (TOC), or less than 1% by weight total F001-F005 solvent constituents listed in 40 CFR 268.41, Table CCWE. [40 CFR 268.2(f)(1)]

Comments _____

2. F020-F023 and F026-F028 Dioxin Wastes: Does the generator correctly determine the appropriate treatability group/treatment standard for each dioxin waste?

Yes ___ No ___ NA ✓

If yes, list each waste code and check the correct treatability group.

Waste Code	Wastewater*	Nonwastewater
___	___	___
___	___	___
___	___	___

Comments _____

*Less than 1% TOC by weight and less than 1% total suspended solids (TSS) by weight. [40 CFR 268.2(f)]

3. First, Second, and Third Third Wastes:

a. Does the generator correctly determine the appropriate treatability group/treatment standard for each waste?

Yes ✓ No ___ NA ___

If available, list each waste code and check the correct treatability group:

Waste Code	Subcategory	Wastewater*	Nonwastewater
D001			✓

* Less than 1% TOC by weight and less than 1% total suspended solids (TSS) with the following exceptions: K011, K013, and K014 wastewaters - less than 5% by weight TOC and less than 1% by weight TSS; K103 and K104 wastewaters - less than 4% by weight TOC and less than 1% by weight TSS. [40 CFR 268.2(f)(2) and (3)]

Comments_____

b. Do the assigned treatment standards for listed wastes cover constituents that may cause the waste to exhibit any characteristics? [40 CFR 268.9 (b)]

Yes ✓ No __ NA __

c. Does the generator specify alternative treatment standards for lab packs?*

Yes __ No __ NA ✓

*Use of the alternative treatment standards is not required. [55 FR 22629]

If yes, do lab packs only contain the following wastes?* [40 CFR 268.42(c)(2)]

__ Organometallics: 40 Part 268, Appendix IV constituents
__ Organics: 40 CFR Part 268, Appendix V constituents

*Unregulated wastes and hazardous wastes which meet treatment standards may be commingled in the appropriate Appendix IV and V lab pack. [55 FR 22629]

d. Does the generator specify alternative treatment standards for F039 multi-source leachate?*

Yes __ No __ NA ✓

*Use of the alternative treatment standards is required. [55 FR 22619]

4. California List Wastes: Has the generator correctly identified the treatability group and treatment standard/prohibition level for the following wastes? [55 FR 22675]

a. Liquid hazardous wastes containing PCBs ≥50 ppm

Yes __ No __ NA ✓

If yes, check the appropriate treatability group:

__ 50 to 500 ppm PCBs
__ ≥500 ppm PCBs

b. Listed or characteristic wastes containing ≥1,000 mg/l (liquids) or mg/kg (non-liquids) HOCs, which are not listed or characterized by the HOC content

Yes ___ No ___ NA ✓

If yes, check the appropriate treatability group:

___ Dilute HOC wastewater (1,000 mg/l to 10,000 mg/l HOCs)
___ All other HOCs greater than or equal to the prohibition level of 1,000 mg/l (liquids) or mg/kg (non-liquids)

c. Liquid hazardous wastes that exhibit a characteristic and also contain ≥ 134 mg/l nickel and/or ≥130 mg/l thallium

Yes ___ No ___ NA ✓

5. National Capacity Variance Wastes: Have all applicable California List prohibitions been identified for wastes covered under national capacity variances? (See Appendix A.)

Yes ___ No ___ NA ✓

If a wastestream contains a mixture of wastes, and a variance only applies to some of the waste codes, has the generator identified all applicable treatment standards and California List prohibitions? (See Appendix A.)

Yes ___ No ___ NA ✓

If California List prohibitions apply to wastestreams managed by the generator, complete the following table for each waste code, noting the date on which relevant national capacity variances expire.

Waste Code	Cal List Applicability	Expiration Date
___	_____	__/__/__
___	_____	__/__/__
___	_____	__/__/__

Comments_____

6. Treatment standards expressed as required technologies: Has the generator specified an alternative method to that required in 40 CFR 268.42?

Yes ___ No ✓ NA ___

If yes, list the waste code, the technology specified in 40 CFR 268.42, the alternative method, and documentation of approval. [40 CFR 268.42(b)]

Waste Code	Required Technology	Alternative Method	Approval
___	_____	_____	_____
___	_____	_____	_____
___	_____	_____	_____

Comments_____

7. Does the generator mix restricted wastes with different treatment standards for a constituent of concern?

Yes ___ No ✓

If yes, did the generator select the most stringent treatment standards? [40 CFR 268.41(b) and 268.43(b)]

Yes ___ No ___

Comments _____

B. **Waste Analysis**

1. Does the generator determine whether restricted wastes exceed treatment standards/prohibition levels at the point of generation?* [268.7(a)]

Yes ✓ No ___

*Note: This determination may be made at the point of disposal if the waste only has a prohibition level in effect.

If no, does the generator ship all restricted wastes as not meeting treatment standards?

Yes ___ No ___

Comments _____

2. Which of the following analytical methods does the generator employ?*

*Note: A "No" answer to applicable questions b. through d. does not necessarily constitute a violation. However, knowledge of waste is rarely adequate if a generator certifies that treatment standard criteria have been met.

a. Knowledge of waste:

Yes ✓ No ___

If yes, list the wastes for which applied knowledge was used and describe the basis of determination. Attach documentation. [40 CFR 268.7(a)(5)]
ALL SHIPMENTS ARE ANALYZED ON SITE

b. TCLP*: Are wastes with treatment standards specified in 40 CFR 268.41 analyzed using TCLP?** (BDAT*** = stabilization/immobilization technology)

Yes ___ No ___ NA ✓

*TCLP = Toxicity Characteristic Leaching Procedure (40 CFR Part 268, Appendix I, EPA Test Method 1311)
**See Appendix C for exceptions.
***BDAT = best demonstrated available technology. See Appendix A.

If yes, list the wastes for which TCLP was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results. [40 CFR 268.7(a)(5)]

_____

_____

c. Total constituent analysis: Are wastes with treatment standards specified in 268.43 analyzed using total constituent analysis?* (BDAT = destruction/removal technology)

Yes ___ No ___ NA ✓

*See Appendix C for exceptions.

If yes, list the wastes for which total constituent analysis was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results. [40 CFR 268.7(a)(5)]

_____

_____

d. PFLT*: Was PFLT used to determine if California List constituents were contained in *liquid* hazardous waste?

Yes ___ No ___ NA ✓

*PFLT = Paint Filter Liquids Test [Test Method 9095, EPA Publication No. SW-846]

If yes, list the wastes for which PFLT was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results. [40 CFR 268.7 (a)(5)]

_____

_____

3. Does the generator treat restricted wastes in 90-day tanks or containers regulated under 40 CFR 262.34 (permissible in some states)?

Yes ___ No ✓ (If No, go to 4.)

Does the generator treat the wastes to meet appropriate treatment standards/prohibition levels?

Yes ___ No ___

If yes, has the generator prepared a waste analysis plan detailing the frequency of testing to be conducted? 40 CFR 268.7(a)(4)]

Yes ___ No ___ (If No, go to 4.)

Does the plan fulfill the following? [40 CFR 268.7(a)(4)(i)]

___ Based on a detailed chemical and physical analysis of a representative sample
___ Contains information necessary to treat the wastes in accordance with 40 CFR Part 268 requirements

Has the plan been filed with the Regional Administrator (return receipt, Federal Express slip, etc. required for verification)? [40 CFR 268.7(a)(4)(ii)]

Yes ___ No ___

Comments _____

4. Dilution Prohibition [40 CFR 268.3]:

a. Does the generator mix prohibited* wastes with different treatment standards?

*See Appendix E for distinction between restricted and prohibited wastes.

Yes ___ No ✓ (If No, go to b.)

List the wastes _____

Are the wastes amenable to the same type of treatment? [55 FR 22666]

Yes ___ No ___

Comments _____

b. Does the generator dilute prohibited wastes to meet treatment standard criteria, or render them non-hazardous? [55 FR 22665-22666]

Yes ___ No ✓ (If No, go to c.)

Check appropriate category:

___ Dilutes to meet treatment standards
___ Dilutes to render waste non-hazardous

Do the wastes fall into the following categories? (Check if appropriate.) [40 CFR 268.3(b)]

___ Managed in treatment systems regulated under the Clean Water Act
___ Non-toxic* characteristic wastes
___ Treatment standard specified in 40 CFR 268.41 or 268.43

*Non-toxic = D001(except high TOC nonwastewaters), D002, and D003(except cyanides and sulfides). [55 FR 22666]

If the wastes do not fall into the above categories, briefly describe the conditions under which they were diluted.

_____

c. Based on an assessment of points a. and b., and any other relevant circumstances, does the generator dilute prohibited wastes as a substitute for adequate treatment? [40 CFR 268.3(a)]

Yes ___ No ✓

Comments _____

5. F039 Multi-source leachate: Has the generator run an initial analysis for all constituents of concern in 40 CFR 268.41 and 268.43? [55 FR 22620]

Yes ___ No ___ NA ✓

C. Management

1. On-Site Management

a. Are restricted wastes treated (other than in a RCRA exempt unit), stored for greater than 90 (small quantity generator* - 180) days, or disposed on site?

Yes ✓ No ___

(If yes, the TSD Checklist must also be completed.)

* Small quantity generator = generator of greater than or equal to 100 kg/mo. but less than 1,000 kg/mo. hazardous waste, or less than 1 kg/mo. acutely hazardous waste

Comments _____

b. If the generator treats characteristic wastes in systems regulated under the Clean Water Act, have the following been documented: the determination of restriction, how restricted wastes are managed, and why wastes discharged pursuant to an NPDES permit are not prohibited (if applicable)? [55 FR 22662]

Yes ___ No ___ NA ✓

c. If the generator treats characteristic wastes in RCRA exempt units to render them non-hazardous, are the wastes managed as restricted until 40 CFR Part 268 treatment standards are met?* [40 CFR 268.9(d)]

Yes ___ No ___ NA ✓

*This applies to both concentration based treatment standards specified in 40 CFR 268.41 and 268.43, and to some 40 CFR 268.42 required methods which result in treatment below the characteristic level. See Appendix D.

2. Off-Site Management: Waste Exceeds Treatment Standards

a. Does the generator ship any waste that exceeds treatment standards /prohibition levels (not subject to a national capacity variance) to an off-site treatment or storage facility?

Yes ✓ No ___ (If No, go to 3.)

Identify waste code(s) and off-site treatment or storage facilities to which wastes are shipped.

Waste Code	Receiving Facility
F001,2,3+5	S-K: CLARKSVILLE, MO + HERRON, OH
D001	S-K: DOLTON, IL + FRANKLIN PARK, IL

Does the generator provide a notification to the treatment or storage facility? [40 CFR 268.7(a)(1)]

Yes ✓ No ___ (If No, go to 3.)

If the generator specifies alternative treatment standards for lab packs, is the certification required in 40 CFR 268.7(a)(7) or (8) included with the notification?

Yes ___ No ___ NA ✓

b. Is a notification sent with each waste shipment?

Yes ✓ No ___

If no, is the waste subject to a tolling agreement pursuant to 262.20(e) (small quantity generator only)?

Yes ___ No ___ (If No, go to 3.)

List waste codes and subsequent handler with whom a contractual tolling agreement is held.

Waste Code	Subsequent Handler
___	_____
___	_____
___	_____

Did the small quantity generator provide a notification to the receiving facility with the first waste shipment subject to the tolling agreement? [40 CFR 268.7(a)(9)]

Yes ___ No ___

3. Off-Site Management: Waste Meets Treatment Standards

a. Does the generator ship waste that meets treatment standards/prohibition levels to an off-site disposal facility?

Yes ___ No ✓ (If No, go to 4.)

Identify waste code(s) and off-site disposal facilities:

Waste Code	Receiving Facility
___	_____
___	_____
___	_____

Does the generator provide a notification and a certification to the disposal facility? [40 CFR 268.7(a)(2)(i) and 268.7(a)(2)(ii)]?

Yes ___ No ___ (If No, go to d.)

b. Are a notification and a certification sent with each waste shipment?

Yes ___ No ___

If no, is the waste subject to a tolling agreement pursuant to 262.20(e) (small quantity generator only)?

Yes ___ No ___ (If No, go to c.)

List waste codes and subsequent handler with whom a contractual tolling agreement is held.

Waste Code	Subsequent Handler
___	_____
___	_____
___	_____

Did the small quantity generator provide a notification and a certification to the receiving facility with the first waste shipment subject to the tolling agreement? [40 CFR 268.7(a)(9)]

Yes ___ No ___

c. Are characteristic wastes which have been rendered non-hazardous (in a RCRA exempt unit) shipped to a Subtitle D facility?

Yes ___ No ___ NA ___ (If No or NA, go to 4.)

Complete the following table:

Waste Code	Receiving Facility
___	_____
___	_____
___	_____

Are a notification and a certification for each shipment sent to the Regional Administrator or authorized State? [40 CFR 268.9(d)(1) and 268.7(b)(5)]?

Yes ___ No ___

4. Off-Site Management: Wastes Subject to Variances, Extensions, or Petitions

a. Does the generator ship wastes to a treatment, storage, or disposal facility which are subject to a national capacity variance (40 CFR Part 268, Subpart C), or case-by-case extension (40 CFR 268.5)?

Yes ___ No ✓ (If No, go to 5.)

Complete the following table:

Waste Code	Receiving Facility
___	_____
___	_____
___	_____

Does the generator provide notification to the off-site receiving facility that the waste is not prohibited from land disposal? [40 CFR 268.7(a)(3)]

Yes ___ No ___

b. Is a notification sent with each waste shipment?

Yes ___ No ___

If no, is the waste subject to a tolling agreement pursuant to 40 CFR 262.20(e) (small quantity generator only)?

Yes ___ No ___ (If No, go to 5.)

List waste codes and subsequent handler with whom a contractual tolling agreement is held.

Waste Code	Subsequent Handler
___	_____
___	_____
___	_____

Did the small quantity generator provide a notification to the receiving facility with the first waste shipment subject to the tolling agreement? [40 CFR 268.7(a)(9)]

Yes ___ No ___

5. Records Retention

Does the generator retain on site copies of all notifications, certifications, and other relevant documents for a period of 5 years? [40 CFR 268.7(a)(6)]

Yes ✓ No ___

Are copies of relevant tolling agreements, along with the LDR notification and/or certification, kept on site for at least 3 years after expiration or termination of the agreement? [40 CFR 268.9]

Yes ___ No ___ NA ✓

Do LDR documents reflect proper management of wastes previously covered under expired national capacity variances, case by case extensions and the soft hammer provision*?

Yes ___ No ___ NA ✓

*See Appendix B. Note that the soft hammer provision expired as of 05/08/90. Soft hammer wastes which had treatment standards established in the Third Third rule were granted a minimum 90-day national capacity variance to 08/08/90.

Comments _____

D. **Treatment Using RCRA 40 CFR Parts 264 and 265 Exempt Units or Processes**

1. Are restricted wastes treated in RCRA exempt units (i.e., boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.)?

   Yes ✓ No ___ (If No, do not complete this section.)

   List types of waste treatment units and processes:

Waste Code	Type of Treatment	Treatment Units and Processes
F001, 2, 3, 5	RECLAMATION	DISTILLATION UNIT
		WASTE WATER TREATMENT UNIT

2. Are treatment residuals generated from these units?

   Yes ✓ No ___

   Comments STILL BOTTOMS; TANK BOTTOMS

3. Are residuals further treated, stored for greater than 90/180 days, or disposed on site?

   Yes ✓ No ___ NA ___

   (If yes, the TSD checklist must also be completed.)

E. **Additional Comments, Concerns, or Issues Not Addressed in the Checklist:**

RCRA LAND DISPOSAL RESTRICTION INSPECTION

IV. TSD REQUIREMENTS

A. Waste Analysis [40 CFR 268.7(b), 264.13, and 265.13]

1. Does the waste analysis plan address the following LDR waste categories? [40 CFR 264.13(b)(6) and 265.13(b)(6)]

F001-F005 Spent Solvents	Yes ✓	No ___	NA ___
F020-F023 and F026-F028 Dioxins	Yes ___	No ___	NA ✓
California List Wastes	Yes ✓	No ___	NA ___
First, Second, and Third Third Wastes	Yes ✓	No ___	NA ___

Comments_____

2. Has the waste analysis plan been revised to address F039 multi-source leachate?

Yes ___ No ___ NA ✓

3. What date was the waste analysis plan last revised? 9/28/90

4. Does analytical data contain all the information required to treat, store, or dispose of restricted wastes? [40 CFR 264.13(a)(1) and 265.13(a)(1)]

Yes ✓ No ___

If yes, which of the following are sources of analytical data? (More than one may apply.):

✓ Generator provides data
✓ Facility performs analyses in on-site laboratory
___ Facility contracts analyses at off-site laboratory

If the generator provides data, does the facility provide corroborative testing? [40 CFR 264.13(a)(2) and 265.13(a)(2)]

Yes ✓ No ___ NA ___

If analyses are conducted off site, identify lab:_____

a. Are wastes with treatment standards specified in 40 CFR 268.41 analyzed using the toxicity characteristic leaching procedure (TCLP)?* (BDAT** = stabilization/immobilization technology) [40 CFR 268.7(b)(1)]

Yes ___ No ___ NA ✓

*See Appendix C for exceptions.
**BDAT = best demonstrated available technology. See Appendix A.

If yes, list the wastes for which TCLP was used and provide the date of last test, frequency of testing, and note any problems. Attach test results. [40 CFR 264.73 (b)(3) and 265.73(b)(3)]

_____

_____

b. Are wastes with treatment standards specified in 40 CFR 268.43 analyzed using total constituent analysis?* (BDAT = destruction/removal technology) [40 CFR 268.7(b)(3)]

Yes ___ No ___ NA ✓

*See Appendix C for exceptions.

If yes, list the wastes for which total constituent analysis was used and provide the date of last test, frequency of testing, and note any problems. Attach test results. [40 CFR 264.73 (b)(3) and 265.73(b)(3)]

_____

_____

c. Is the paint filter liquids test (PFLT) used to determine if California List wastes are contained in *liquid* hazardous waste? [40 CFR 268.32(i)]

Yes ___ No ___ NA ✓

If yes, list the wastes for which PELT was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results. [40 CFR 264.73(b)(3) and 265.73(b)(3)]

_____

_____

B. Operating Record [40 CFR 264.73 and 265.73]

1. Does the operating record contain records and results of waste analyses performed as specified in 40 CFR 268.4 and/or 40 CFR 268.7(b)? [40 CFR 264.73(b)(3) and 265.73(b)(3)]

Yes ✓ No ___

2. Does the operating record contain copies of LDR notifications and certifications?* [40 CFR 264.73(b)(11), (13), and (15) and 40 CFR 265.73(b)(11), (13), and (15)]

Yes ✓ No ___

*Include both those received from generators, and those prepared for off-site shipments.

3. Does the operating record include appropriate documentation for restricted wastes which are managed wholly on site? [40 CFR 264.73(b)(12), (14), and (16) and 265.73(b)(12), (14), and (16)]

Yes ✓ No ___ NA ___

Does the documentation discussed in points 2. and 3. reflect proper historical management of wastes previously covered under expired national capacity variances, case by case extensions, and the soft hammer provision?*

Yes ___ No ___ NA ✓

*Note that the soft hammer provision expired as of 05/08/90. Soft hammer wastes which had treatment standards established in the Third Third rule were granted a minimum 90-day national capacity variance to 08/08/90.

C. Storage [40 CFR 268.50]

1. Are prohibited* wastes stored on site in containers?

Yes ✓ No ___ (If No, go to 2.)

*See Appendix E for distinction between restricted and prohibited wastes.

Are all containers clearly marked to identify the contents and date(s) entering storage? [40 CFR 268.50(a)(2)(i)]

Yes ✓ No ___

Have wastes been stored for more than one year since the applicable LDR regulations went into effect?

Yes ___ No ✓ (If No, go to 2.)

Can the facility show that such accumulation is necessary to facilitate proper recovery, treatment, or disposal? [40 CFR 268.50 (c)]

Yes ___ No ___

If yes, state how:_____

2. Are prohibited wastes stored on site in tanks?

Yes ✓ No ___ (If No, go to 3.)

Are all tanks clearly marked with a description of the contents, the quantity of each hazardous waste received, and date each period of accumulation begins, or is such information recorded and maintained in the operating record? [40 CFR 268.50(a)(2)(ii)]

Yes ✓ No ___

Have tanks been emptied at least once per year since the applicable LDR regulations went into effect?

Yes ✓ No ___ (If Yes, go to 3.)

Can the facility show that such accumulation is neccesary to facilitate proper recovery, treatment, or disposal? [40 CFR 268.50(c)]

Yes ___ No ___

If yes, state how:_____

3. Does the facility store liquid hazardous waste containing PCBs at concentrations greater than or equal to 50 ppm?

Yes ___ No ✓ (If No, go to D.)

Does the facility meet the TSCA criteria in 40 CFR 761.65(b)? [40 CFR 268.50(f)]

Yes ___ No ___

Have these wastes been stored for more than one year? [40 CFR 268.50(f)]

Yes ___ No ___

D. Treatment

1. Does the facility treat restricted wastes other than in surface impoundments?

Yes ✓ No ___ (If No, do not complete this section. Go to E.)

2. Are required technologies used to treat wastes which have treatment standards specified in 40 CFR 268.42? [40 CFR 268.40(b)]

Yes ✓ No___ NA___ (If Yes or NA, go to 3.)

Was an alternative method approved?

Yes___ No___

List each waste code, the technology specified in 40 CFR 268.42, and the alternative method. Check if approval of the alternative method is documented. [40 CFR 268.42(b)]

Waste Code	Required Technology	Alternative Method	Approval

3. Lab packs: If alternative treatment standards are specified, are incinerator residues from lab packs containing D004, D005, D006, D007, D008, D010, and D011 treated in compliance with the subpart D treatment standards for these characteristic wastes? [40 CFR 268.42(c)(4)]

Yes___ No___ NA ✓

4. Describe all other waste codes and treatment processes:

Waste Code	Treatment Processes
F001, 2, 3 & 5	DISTILLATION; FRACTIONATION
D001	LIQUID-LIQUID EXTRACTION

5. Characteristic wastes:

Is the 40 CFR Part 268 treatment standard lower than the 40 CFR Part 261 characteristic level?*

Yes ✓ No ___

*This applies to both concentration based treatment standards specified in 40 CFR 268.41 and 268.43, and to some 40 CFR 268.42 required methods which result in treatment below the characteristic level. See Appendix D.

If yes, does the facility manage the waste as restricted until 40 CFR Part 268 treatment standards are met, even after the waste is rendered non-hazardous? [40 CFR 268.9(d)]

Yes ✓ No ___

Comments ___

6. Dilution Prohibition [40 CFR 268.3]:

a. Does the facility mix prohibited wastes with different treatment standards?

Yes ___ No ✓ (If No, go to c.)

List the wastes ___

b. Are the wastes amenable to the same type of treatment? [55 FR 22666]

Yes ___ No ___

If yes, is this method used for the aggregated wastes?

Yes ___ No ___

Comments ___

c. Based on an assessment of points a. and b., or any other relevant information, is dilution used as a substitute for treatment? [40 CFR 268.3(a)]

Yes ___ No ✓

Comments ___

7. Does the facility, in accordance with an acceptable waste analysis plan, test residues from all treatment processes? [40 CFR 268.7(b)]

Yes ✓ No ___

Comments _____

8. Does the facility ship any characteristic wastes which have been rendered non-hazardous to a Subtitle D facility?

Yes ___ No ✓ (If No, go to 9.)

Complete the following table:

Waste Code	Receiving Facility
___	_____
___	_____
___	_____

Are a notification and a certification for each shipment sent to the Regional Administrator or authorized State? [40 CFR 268.9(d)(1) and 268.7(b)(5)]

Yes ___ No ___

9. Does the facility ship any wastes or treatment residues to an off-site land disposal facility?

Yes ___ No ✓ (If No, go to 10.)

Complete the following table:

Waste Code	Receiving Facility
___	_____
___	_____
___	_____

Are a notification and a certification provided to the land disposal facility with each waste shipment? [40 CFR 268.7(b)(4) and 40 CFR 268.7(b)(5)]

Yes ___ No ___

10. Does the facility ship any wastes or treatment residues to be further managed at a different treatment or storage facility?

Yes ✓ No ___ (If No, go to E.)

Complete the following table:

Waste Code	Receiving Facility
F001,2,3+5	S-K: CLARKSVILLE, MO. + HEBRON, OH
D001	S-K: DOLTON, IL + FRANKLIN PK, IL

Are appropriate generator notifications and certifications provided to the receiving facility with each waste shipment? [40 CFR 268.7(b)(6)]

Yes ✓ No ___

E. Surface Impoundments [40 CFR 268.4]

1. Are restricted wastes placed in surface impoundments for treatment?

   Yes ___ No ✓ (If No, go to F.)

   List ___

2. Are evaporation or dilution the only recognizable treatment occurring in the surface impoundment? [40 CFR 268.3(a) and 268.4(b)]

   Yes ___ No ___

   Comments ___

3. Has the facility submitted to the Agency a waste analysis plan and certification of compliance with minimum technology requirements and ground-water monitoring requirements? [40 CFR 268.4(a)(4)]

   Yes ___ No ___

4. If the minimum technology requirements have not been met, has a waiver been granted for that unit? [40 CFR 268.4(a)(3)(ii)]

   Yes ___ No ___ NA ___

5. Are representative samples of sludge and supernatant from the surface impoundment tested separately, acceptably, and in accordance with the sampling frequency and analyses specified in the waste analysis plan? (Attach test results.) [40 CFR 268.4(a)(2)(i)]

   Yes ___ No ___

6. Does the operating record adequately document the results of waste analyses performed in accordance with 40 CFR 268.4? [40 CFR 264.73(b)(3) and 265.73(b)(3)]

   Yes ___ No ___

   Comments ___

7. Do the treatment residues (sludges or liquids) exceed applicable treatment standards/prohibition levels?

Sludge Yes ___ No ___ Waste Code _____
Supernatant Yes ___ No ___ Waste Code _____

Provide the frequency of analyses conducted on treatment residues:

_____

8. If sludge residues exceed treatment standards/prohibition levels, are they removed on an annual basis? [40 CFR 268.4(a)(2)(ii)]

Yes ___ No ___ NA___

Comments _____

Are residues subsequently managed in another surface impoundment? [40 CFR 268.4(a)(2)(iii)]

Yes ___ No ___

9. If supernatant is determined to exceed treatment standards, is annual throughput greater than impoundment volume? [40 CFR 268.4(a)(2)(ii)]

Yes ___ No ___ NA___

Comments_____

F. **Land Disposal**

1. Are restricted wastes placed in or on the land in units such as landfills, surface impoundments*, waste piles, land treatment units, salt domes/beds, mines/caves, concrete vaults, or bunkers? [40 CFR 268.2(c)]

Yes ___ No ✓ (If No, go to G.)

*Note: Do not include surface impoundments addressed in E.

If yes, specify which units and what wastes each unit has received:

Unit	Waste

2. Does the facility, in accordance with an acceptable waste analysis plan, test prohibited wastes prior to land disposal to ensure that all applicable treatment standards and/or prohibition levels have been met? [40 CFR 268.7(c)(2)]

Yes ___ No ___

Comments_____

3. Does the facility test wastes to ensure that they do not exhibit any characteristics at the point of disposal?* [40 CFR 268.9(c)]

Yes ___ No ___ NA___

*Note: A waste may exceed a characteristic level only if the treatment standard for that characteristic has been met.

4. Does the operating record adequately document the results of waste analyses performed in accordance with 40 CFR 268.7(c)? [40 CFR 264.73(b)(3) and 265.73(b)(3)

Yes ___ No ___

If yes, at what frequency are analyses performed?_____

_____

5. Does the facility land dispose of restricted wastes which are not prohibited?

Yes ___ No ___ (If No, go to 6.)

List waste codes in appropriate category below:

National Capacity Variance (40 CFR Part 268, Subpart C)_____
Case-By-Case Extension (40 CFR 268.5)_____
No-Migration Petition (40 CFR 268.6)_____
Treatment Standard Variance (40 CFR 268.44)_____

Does the operating record contain records of the quantities, date of placement, and a copy of the generator notification [40 CFR 268.7(a)(3)] for each shipment of restricted waste subject to a case-by case extension or no-migration petition? [40 CFR 264.73(b)(10) and 265.73(b)(10)]

Yes ___ No ___ NA ___

Do land disposal units receiving wastes covered by a national capacity variance or case-by-case extension meet the requirements in 40 CFR 268.5(h)(2)?

Yes ___ No ___ NA ___

If the facility has a case-by-case extension, is progress being made as described in reports to the Regional Administrator?

Yes ___ No ___ NA ___

6. Are restricted wastes placed in underground injection wells?

Yes ___ No ___ List _____

G. **Other Wastestreams**

1. Does the facility generate wastes other than residues from RCRA treatment units?

   Yes ✓ No ___ (If No, go to H.)

2. On-Site Management

   a. If characteristic wastes are treated in systems regulated under the Clean Water Act, have the following been documented: the determination of restriction, how restricted wastes are managed, and why wastes discharged pursuant to an NPDES permit are not prohibited (if applicable)? [55 FR 22662]

   Yes ___ No ___ NA ✓

   b. If characteristic wastes are treated in RCRA exempt units to render them non-hazardous, are the wastes managed as restricted until 40 CFR Part 268 treatment standards are met?* [40 CFR 268.9(d)]

   Yes ___ No ___ NA ✓

   *This applies to both concentration based treatment standards specified in 40 CFR 268.41 and 268.43, and to some 40 CFR 268.42 required methods which result in treatment below the characteristic level. See Appendix D.

3. Off-Site Management: Waste Exceeds Treatment Standards

   Are wastes that exceed treatment standards/prohibition levels (not subject to a national capacity variance) shipped to an off-site treatment or storage facility?

   Yes ✓ No ___ (If No, go to 4.)

   Identify wastes code(s) and off-site treatment or storage facilities to which wastes are shipped.

Waste Code	Receiving Facility
F001, F002	S-L: HEBRON, OH
F003, F005	S-L: DOLTON, IL
D001	S-L: FRANKLIN PARK, IL

   Are LDR notifications provided for each shipment to the treatment or storage facility? [40 CFR 268.7(a)(1)]

   Yes ✓ No ___ (If No, go to 4.)

If alternative treatment standards are specified for lab packs, is the certification required in 40 CFR 268.7(a)(7) or (8) included with the notification?

Yes ___ No ___ NA ✓

4. Off-Site Management: Wastes Meets Treatment Standards

a. Are wastes that meet treatment standards/prohibition levels shipped to an off-site disposal facility?

Yes ___ No ✓ (If No, go to 5.)

Identify waste code(s) and off-site disposal facilities:

Waste Code	Receiving Facility

Are LDR notifications and certifications provided for each shipment to the disposal facility? [40 CFR 268.7(a)(2)(i) and 268.7(a)(2)(ii)]?

Yes ___ No ___ (If No, go to b.)

b. Are characteristic wastes which have been rendered non-hazardous (in a RCRA exempt unit) shipped to a Subtitle D facility?

Yes ___ No ___ NA ___ (If No or NA, go to 5.)

Complete the following table:

Waste Code	Receiving Facility

Are a notification and a certification for each shipment sent to the Regional Administrator or authorized State? [40 CFR 268.9(d)(1) and 268.7(b)(5)?

Yes ___ No ___

5. Off-Site Management: Wastes Subject to Variances, Extensions, or Petitions

a. Are wastes that are subject to a national capacity variance (40 CFR Part 268, Subpart C) or a case-by-case extension (40 CFR 268.5) shipped to a treatment, storage, or disposal facility?

Yes ___ No ✓ (If No, go to 6.)

Complete the following table:

Waste Code	Receiving Facility

b. Are LDR notifications (stating that the waste is not prohibited from land disposal) provided for each shipment to the off-site receiving facility? [40 CFR 268.7(a)(3)]

Yes ___ No ___

6. Dilution Prohibition [40 CFR 268.3]:

a. Are prohibited* wastes with different treatment standards mixed?

*See Appendix E for distinction between restricted and prohibited wastes.

Yes ___ No ✓ (If No, go to b.)

List the wastes_____

Are the wastes amenable to the same type of treatment? [55 FR 22666]

Yes ___ No ___

Comments_____

b. Are prohibited wastes diluted to meet treatment standard criteria, or render them non-hazardous? [55 FR 22665-22666]

Yes ___ No ✓ (If No, go to c.)

Check appropriate category:

___ Dilutes to meet treatment standards
___ Dilutes to render waste non-hazardous

Do wastes fall into the following categories? (Check if appropriate.) [40 CFR 268.3(b)]

___Managed in treatment systems regulated under the Clean Water Act
___Non-toxic* characteristic wastes
___Treatment standard specified in 40 CFR 268.41 or 268.43

*Non-toxic = D001 (except high TOC nonwastewaters), D002, and D003 (except cyanides and sulfides). [55 FR 22666]

If the wastes do not fall into the above categories, briefly describe the conditions under which they were diluted.

_____
_____
_____

c. Based on an assessment of points a. and b., and any other relevant circumstances, are prohibited wastes diluted as a substitute for adequate treatment? [40 CFR 268.3(a)]

Yes ___ No ✓

Comments_____

H. Additional Comments, Concerns, or Issues Not Addressed in the Checklist:

_____
_____
_____
_____
_____
_____
_____
_____
_____
_____
_____
_____
_____
_____
_____
_____
_____
_____
_____
_____
_____
_____
_____
_____
_____
_____

B. 1.10

TANK INSPECTION REPORT

for

SAFELY-KLEEN CORPORATION
CHICAGO RECYCLE CENTER
1445 W. 42nd Street
Chicago, IL 60609

by

PROJECT RESOURCES, INC.

Professional Engineer: _____
James L. Bishop

License Number: 062-045960, State of Illinois

Date: October 18, 1995

RECEIVED
DEC 15 1995
IEPA-BOL
PERMIT SECTION

SECTION I

TEXT

SCOPE OF WORK

A complete visual inspection, both internal and external was performed for the Safely-Kleen Corporation, Chicago Recycle Center on nineteen hazardous waste storage tanks located in tank farms #5 and #2. In addition, thickness measurements were made using an ultrasonic instrument. All work was performed with the intent of certifying each tank for hazardous waste service.

FIELD WORK

Each tank was emptied, vented, and cleaned. All connections were blinded. A complete outside visual inspection was made. This included: check for leaks, check of all welds, check of the foundation and tank support, check of any insulation and/or fireproofing and operation of the safety vent system. Next a thickness profile was made of each tank using the ultrasonic instrument. Finally, a complete internal inspection was made. This included a check of the sidewall, roof and bottom surfaces with particular attention to the condition of all welds. A check of any internal items, such as: baffles, level gauge floats and dip tubes was also done.

QUALIFICATIONS

Project Resources, Inc. is a full service engineering firm specializing in process and project engineering for the chemical, pharmaceutical, food, hazardous waste and petrochemical industries. Our personnel have conducted numerous tank inspections (installation, removal, aboveground, underground) and have certified these tanks for permitting purposes, closure, and on-going operations. Our technicians are fully trained and certified for tank inspection work including: 40 hour safety training, tank entry, certified welder.

CERTIFICATION

The nineteen (18) tanks in tank farm #5 and the one tank in tank farm #2 have been fully inspected and are found to be in suitable condition for use as hazardous waste storage tanks. However, tanks 35A & 35B were found to have some extensive corrosion and they should be given an internal inspection with a full ultrasonic profile within two years. Tank #176 should be inspected within two years also. A full ultrasonic profile should be done to compare with the present readings. If the thickness readings in 1997 show no increase in corrosion the tank #176 could be put back on a normal inspection cycle. All other tanks can remain on a normal inspection cycle.

RECEIVED
DEC 15 1995
IEPA-BOL
PERMIT SECTION

CERTIFICATION (cont.)

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

James L. Bishop, P.E. Date: 10/18/95

SECTION II

STORAGE TANK INSPECTION RECORDS

TANKS INSPECTED

The following tanks were inspected by Project Resources, Inc.. The Storage Tank Inspection Records are included for each tank.

TANK NUMBERS

T-30A	T-37A
T-30B	T-37B
T-31	T-38
T-32	T-39
T-33	T-40A
T-34A	T-40B
T-34B	T-41A
T-35A	T-41B
T-35B	T-176 (Tank Farm #2)
T-36	

T- 30A

Storage Tank Inspection Record

Sheet: 1 Of 1

Facility: Safety Kleen (Chicago Recycle)
Location: 1445 W. 42nd Street
Type Inspection: Interior X Exterior
Item No. Code:
Service: Product Storage (Premit for Hazardous Waste)
Capacity: 7500 Tank Type: Piggyback steel tank

Job No.
Date: 9/18/95
By: R.R.Haavig
Year Built: 1988

	Roof/Top Head	Wall/Shell	Floor/Bottom	Jacket
	Slight cone		Cone bottom	
Matls:	304 SS	304 SS	304 SS	None

Wall/Shell Condition: Excellent
Roof Condition: Excellent
Bottom Condition: Excellent
Jacket Condition: N/A
Support Type: Steel skirt w/ fireproof insulation
Foundation Condition: Excellent
Internal Structure Condition: Excellent
Welded/Flanged Joint Condition: Excellent
Nozzle Condition: Excellent
Lining/Coating Condition: N/A
Insulation Condition: N/A
Safety Valve Condition: N/A
Signs of Cracks: None
Signs of Leakage: None
Signs of Corrosion: None
Signs of Erosion: None

Test? No Type: Results:
Operating Conditions: Max. Temp. 150 C Max. Press. 3/4" Vac. 3/4"

Reference Inspection Records:

Comments: Tank is in excellent condition.

Thickness Readings: (.184 .185) (.181 .180 .178) (.179 .181 .180) (.178 .179)

Cone is approximately 2 ft. From center drain.

N .273
S .272
E .271
W .274

T- 30B

Storage Tank Inspection Record

Sheet: 1 Of 1
Job No.
Date: 9/18/95
By: R.R.Haavig
Year Built: 1988

Facility: Safety Kleen (Chicago Recycle)
Location: 1445 W. 42nd Street
Type Inspection: Interior X Exterior
Item No. Code:
Service: Product Storage (Permit for Hazardous Waste)
Capacity: Tank Type: SS Piggyback tank

	Roof/Top Head	Wall/Shell	Floor/Bottom	Jacket
	Cone form 30A		Cone bottom	Fireproof
Matls:	304 SS	304 SS	304 SS	Insulation

Wall/Shell Condition: Excellent
Roof Condition: Excellent
Bottom Condition: Excellent
Jacket Condition: Fireproof insulation w/ slight cracks
Support Type: Skirt w/ fireproof insulation
Foundation Condition: Excellent (Concrete dike condition)
Internal Structure Condition: Excellent
Welded/Flanged Joint Condition: Excellent
Nozzle Condition: Excellent
Lining/Coating Condition: Excellent
Insulation Condition: Excellent
Safety Valve Condition: Excellent
Signs of Cracks: None
Signs of Leakage: None
Signs of Corrosion: None
Signs of Erosion: None

Test? No Type: Results:
Operating Conditions: Max. Temp. 150C Max. Press. 3/4" Vac. 3/4"

Reference Inspection Records:

Comments: Tank is in excellent condition.

Thickness Readings: (.269 .270) (.191 .193 .192) (.196 .201 .199) (.197 .194)

From the bottom to the top : starting under manway

Cone

W .265

N .266

E .267

S .267

T- 31

Storage Tank Inspection Record

Sheet: 1 Of 1
Job No.
Date: 10/9/95
By: R.R.HAAVIG
Year Built: 1987

Facility: SAFETY KLEEN (CHICAGO RECYCLE)
Location: 1445 W. 42nd STREET
Type Inspection: Interior X Exterior
Item No. Code:
Service: PRODUCT STORAGE (PERMIT FOR HAZARDOUS WASTE)
Capacity: 1500 Tank Type: STAINLESS STEEL VERTICAL

	Roof/Top Head	Wall/Shell	Floor/Bottom	Jacket
Matls:	304 SS	304 SS	304 SS	N/A

Wall/Shell Condition: EXCELLENT
Roof Condition: EXCELLENT
Bottom Condition: EXCELLENT
Jacket Condition: N/A
Support Type: CARBON STEEL SKIRT W/ FIREPROOF INSULATION
Foundation Condition: EXCELLENT
Internal Structure Condition: EXCELLENT
Welded/Flanged Joint Condition: EXCELLENT
Nozzle Condition: EXCELLENT
Lining/Coating Condition: N/A
Insulation Condition: N/A
Safety Valve Condition: N/A
Signs of Cracks: NONE
Signs of Leakage: NONE
Signs of Corrosion: NONE
Signs of Erosion: NONE
Test? NO Type: Results:
Operating Conditions: Max. Temp. 150 C Max. Press. 3/4" Vac. 3/4"
Reference Inspection Records:

Comments: TANK IS IN EXCELLENT CONDITION

Thickness Readings: (.187 .186) (.184 .187 .185) (.184 .186 .185) (.185 .185 .184) (.184 .186 .184) (.182 .183 .185) (.255 .257)

TOP TO BOTTOM	CONE	N .270	E .267
NEXT TO VAREC GAUGE		S .269	W .272
ON RIGHT SIDE			

T- 32

Storage Tank Inspection Record

Sheet: 1 Of 1

Facility: Safety Kleen (Chicago Recycle)
Location: 1445 W. 42nd Street
Type Inspection: Interior X Exterior
Item No. Code:
Service: Product Storage (Premit for Hazardous Waste)
Capacity: 15,000 Tank Type: Skirted SS (vertical) tank

Job No.
Date: 9/18/95
By: R.R.Haavig
Year Built: 1988

	Roof/Top Head	Wall/Shell	Floor/Bottom	Jacket
	Slight cone		Cone bottom	
Matls:	304 SS	304 SS	304 SS	None

Wall/Shell Condition: Excellent
Roof Condition: Excellent
Bottom Condition: Excellent
Jacket Condition: N/A
Support Type: Steel skirt w/ fireproof insulation - Slight cracking on insulation
Foundation Condition: Excellent
Internal Structure Condition: Excellent
Welded/Flanged Joint Condition: Excellent
Nozzle Condition: Excellent
Lining/Coating Condition: N/A
Insulation Condition: N/A
Safety Valve Condition: N/A
Signs of Cracks: None
Signs of Leakage: None
Signs of Corrosion: None
Signs of Erosion: None

Test? No Type: Results:
Operating Conditions: Max. Temp. 150 C Max. Press. 3/4" Vac. 3/4"

Reference Inspection Records:

Comments: Tank is in excellent condition.

Thickness Readings: (.272 .270) (.199 .201 .201) (.197 .201 .184) (.185 .187 .186) (.188 .189 .186) (.189 .194 .193) (.184 .185)

From bottom to the top starting under manway.

N .249
S .249
E .248
W .251

T- 33

Storage Tank Inspection Record

Sheet: 1 Of 1

Facility: SAFETY KLEEN (CHICAGO RECYCLE)

Job No.

Location: 1445 W. 42nd STREET

Date: 10/9/95

Type Inspection: Interior X Exterior

By: R.R.HAAVIG

Item No. Code:

Year Built: 1987

Service: PRODUCT STORAGE)PERMIT FOR HAZARDOUS WASTE)

Capacity: 15000 Tank Type: CARBON STEEL VERTICAL TANK

	Roof/Top Head	Wall/Shell	Floor/Bottom	Jacket
Matls:	CARBON STEEL	CARBON STEEL	CARBON STEEL	N/A

Wall/Shell Condition: GOOD

Roof Condition: GOOD

Bottom Condition: GOOD

Jacket Condition: N/A

Support Type: STEEL SKIRT W/ FIREPROOF INSULATION

Foundation Condition: EXCELLENT (CONCRETE)

Internal Structure Condition: GOOD

Welded/Flanged Joint Condition: GOOD

Nozzle Condition: GOOD

Lining/Coating Condition: N/A

Insulation Condition: HAIRLINE CRACKS ON SKIRT

Safety Valve Condition: N/A

Signs of Cracks: NONE

Signs of Leakage: NONE

Signs of Corrosion: NONE

Signs of Erosion: NONE

Test? NO Type: Results:

Operating Conditions: Max. Temp. 150 C Max. Press. 3/4" Vac. 3/4"

Reference Inspection Records:

Comments: TANK IS IN GOOD CONDITION

Thickness Readings: TOP MIDDLE BOTTOM

(.296 .297 .284) (.283 .296 .290) (.279 .291 .290 .287)

TOP TO BOTTOM	CONE	N .304	E .328
NEXT TO VAREC GAUGE		S .322	W .300
ON RIGHT SIDE			

T- 34A

Storage Tank Inspection Record

Sheet: 1 Of 1
Job No.
Date: 9/8/95
By: R.R.Haavig
Year Built: 1988

Facility: Safety Kleen (Chicago)
Location: 1445 W. 42nd Street
Type Inspection: Interior X Exterior
Item No. Code:
Service: Product Storage
Capacity: 7500 Tank Type: Piggyback Stack Tank

	Roof/Top Head	Wall/Shell	Floor/Bottom Cone	Jacket
Matls:	Carbon Steel	Carbon Steel	Carbon Steel	None

Wall/Shell Condition: Slight pitting on walls & weld seams
Roof Condition: Good
Bottom Condition: Good
Jacket Condition: None
Support Type: Supported by Tank # 34B
Foundation Condition: Excellent
Internal Structure Condition: Good
Welded/Flanged Joint Condition: Good
Nozzle Condition: Good Slight pitting on welds around nozzles
Lining/Coating Condition: None
Insulation Condition: None
Safety Valve Condition: N/A
Signs of Cracks: None
Signs of Leakage: None
Signs of Corrosion: None
Signs of Erosion: None

Test? No Type: Results:
Operating Conditions: Max. Temp. 150 C Max. Press. 3/4" Vac. 3/4"

Reference Inspection Records:

Comments: Tank is in good condition

Thickness Readings: (.273 .279 .282) (.296 .295 .296)

FROM BOTTOM TO TOP
(STARTING UNDER MAN WAY)

Cone
N .271
S .280
E .277
W .260

T- 34B

Storage Tank Inspection Record

Sheet: 1 Of 1
Job No.
Date: 9/8/95
By: R.R.Haavig
Year Built: 1987

Facility: Safety Kleen (Chicago)
Location: 1445 W. 42nd Street
Type Inspection: Interior X Exterior
Item No. Code:
Service: Product Storage Tank
Capacity: 7500 Tank Type: Piggyback Stack Tank

	Roof/Top Head	Wall/Shell	Floor/Bottom	Jacket
Matls:	Carbon Steel	Carbon Steel	Cone Carbon Steel	Fireproof Insulation

Wall/Shell Condition: Excellent
Roof Condition: Excellent
Bottom Condition: Excellent
Jacket Condition: Fireproof insulation (good condition)
Support Type: Steel skirt w/ fireproof insulation
Foundation Condition: Excellent
Internal Structure Condition: Excellent
Welded/Flanged Joint Condition: Excellent
Nozzle Condition: Excellent
Lining/Coating Condition: N/A
Insulation Condition: Excellent
Safety Valve Condition: N/A
Signs of Cracks: None
Signs of Leakage: None
Signs of Corrosion: None
Signs of Erosion: None

Test? No Type: Results:
Operating Conditions: Max. Temp. 150 C Max. Press. 3/4" Vac. 3/4"

Reference Inspection Records:

Comments: Tank is in excellent condition

Thickness Readings: (.301 .311 .307) (.297 .294 .294)

CONE

N .342
S .331
E .340
W .334

T- 35A

Storage Tank Inspection Record

Sheet: 1 Of 1
Job No.
Date: 9/18/95
By: R. R. HAAVIG
Year Built: 1988

Facility: SAFETY KLEEN (Chicago Recycle)
Location: 1445 W. 42nd Street
Type Inspection: Interior X Exterior
Item No. Code:
Service: PRODUCT STORAGE (Permit for Hazardous Waste)
Capacity: 7500 Tank Type: Piggyback tank (Carbon Steel)

	Roof/Top Head	Wall/Shell	Floor/Bottom	Jacket
Matls:	CARBON STEEL	CARBON STEEL	Cone bottom CARBON STEEL	N/A

Wall/Shell Condition: SLIGHT PITTING UP TO FIRST WELD SEAM
Roof Condition: GOOD
Bottom Condition: SLIGHT PITTING
Jacket Condition: N/A
Support Type: SUPPORTED BY T - 35B
Foundation Condition: EXCELLENT
Internal Structure Condition: GOOD
Welded/Flanged Joint Condition: SLIGHT PITTING
Nozzle Condition: GOOD
Lining/Coating Condition: N/A
Insulation Condition: N/A
Safety Valve Condition: N/A
Signs of Cracks: NONE
Signs of Leakage: NONE
Signs of Corrosion: MINOR SIGNS OF CORROSION ON WALLS
Signs of Erosion: NONE
Test? NO Type: Results:
Operating Conditions: Max. Temp. 150 C Max. Press. 3/4" Vac. 3/4"
Reference Inspection Records:

Comments: CARBON STEEL TANK IS IN GOOD CONDITION.

Thickness Readings: (.277 .275 .281 .277) (.278 .279)

FROM THE BOTTOM TO THE TOP: STARTING UNDER MANWAY

CONE
E .268
W .263
N .267
S .266

T- 35B

Storage Tank Inspection Record

Sheet: 1 Of 1
Job No.
Date: 9/18/95
By: R. R. Haavig
Year Built: N/A

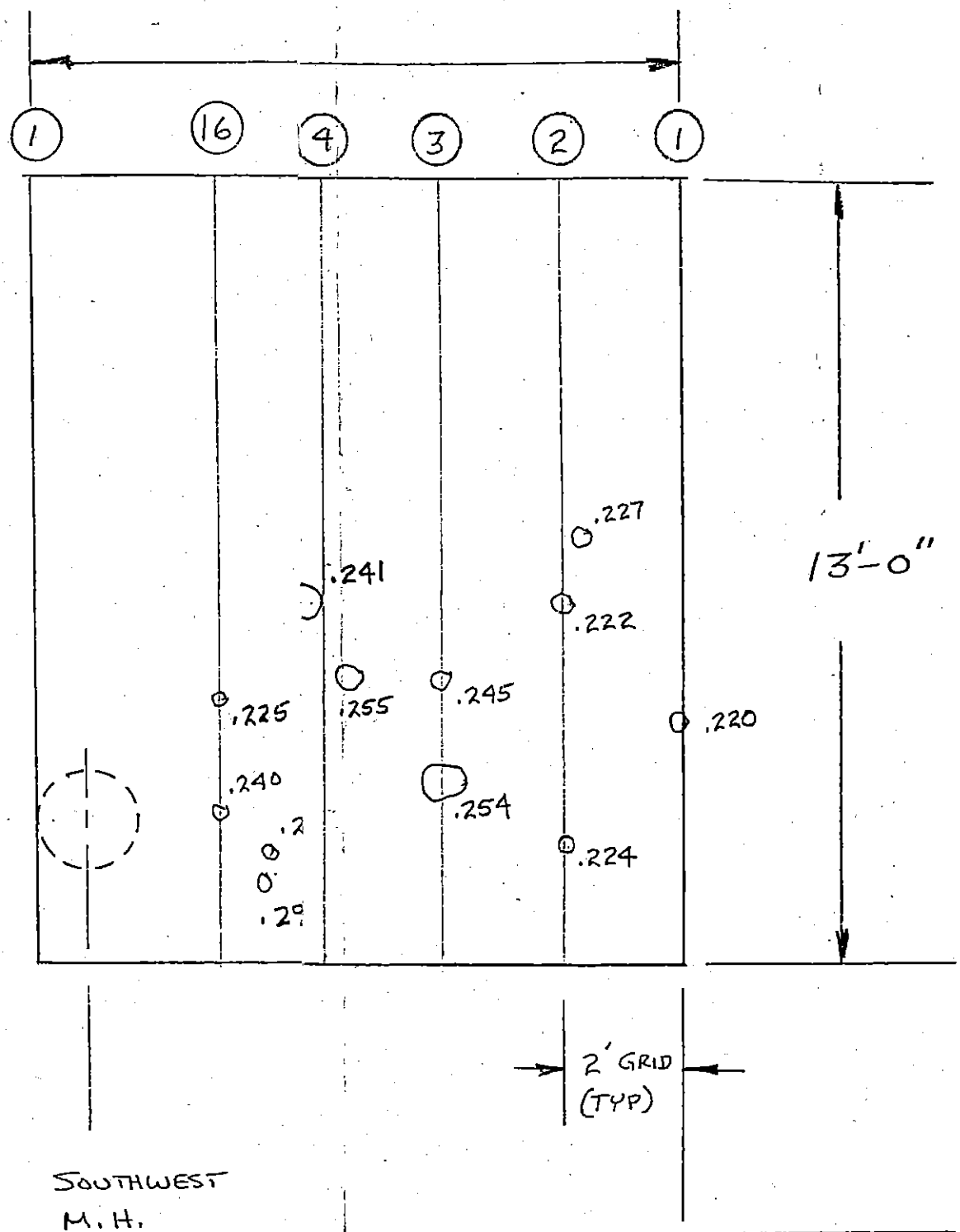
Facility: SAFETY KLEEN (Chicago Recycle)
Location: 1445 W. 42nd Street
Type Inspection: Interior X Exterior
Item No. Code:
Service: PRODUCT STORAGE (Permit for Hazardous Waste)
Capacity: 7500 Tank Type: Carbon Steel piggyback tank

	Roof/Top Head	Wall/Shell	Floor/Bottom	Jacket
	Cone from 35-A tank		Cone	Fireproof
Matls:	Carbon steel	Carbon Steel	Carbon Steel	Insulation

Wall/Shell Condition: Fair with heavy pitting
Roof Condition: Good
Bottom Condition: Fair with heavy pitting
Jacket Condition: N/A
Support Type: Steel skirt with fireproof insulation
Foundation Condition: Excellent
Internal Structure Condition: Good
Welded/Flanged Joint Condition: Fair
Nozzle Condition: Fair
Lining/Coating Condition: N/A
Insulation Condition: Slight cracks in fireproof insulation
Safety Valve Condition: N/A
Signs of Cracks: None
Signs of Leakage: None
Signs of Corrosion: Corrosion is apparent on walls and bottom of tank
Test? No Type: Results:
Operating Conditions: Max. Temp. 150 C Max. Press. 3/4" Vac. 3/4"
Reference Inspection Records:

Comments: Tank is fair condition with pitting on walls and cone.

Thickness Readings:



NOT

TANK 35B
PIT LAYOUT
SK - CHICAGO

9534-001

T- 36

Storage Tank Inspection Record

Sheet: 1 Of 1
Job No.
Date: 9/26/95
By: R.R. HAAVIG
Year Built: 1988

Facility: SAFETY KLEEN (CHICAGO RECYCLE)
Location: 1445 W. 42nd STREET
Type Inspection: Interior X Exterior
Item No. Code:
Service: PRODUCT STORAGE (PERMIT FOR HAZARDOUS WASTE)
Capacity: 15000 Tank Type: STAINLESS STEEL VERTICAL TANK

	Roof/Top Head	Wall/Shell	Floor/Bottom	Jacket
	SLIGHT CONE		CENTER DRAIN	
Matls:	304 S.S.	304 S.S.	304 S.S.	N/A

Wall/Shell Condition: EXCELLENT
Roof Condition: EXCELLENT
Bottom Condition: EXCELLENT
Jacket Condition: N/A
Support Type: STEEL SKIRT W/ FIREPROOF INSULATION *Hairline cracks in insulation*
Foundation Condition: CONCRETE (EXCELLENT)
Internal Structure Condition: EXCELLENT
Welded/Flanged Joint Condition: EXCELLENT
Nozzle Condition: EXCELLENT
Lining/Coating Condition: N/A
Insulation Condition: N/A
Safety Valve Condition: N/A
Signs of Cracks: NONE
Signs of Leakage: NONE
Signs of Corrosion: NONE
Signs of Erosion: NONE
Test? NO Type: Results:
Operating Conditions: Max. Temp. 150 C Max. Press. 3/4" Vac. 3/4"
Reference Inspection Records:

Comments: STAINLESS TANK IS IN EXCELLENT CONDITION.

Thickness Readings: (.268 .267) (.193 .195 .194) (.195 .195 .192)
(.194 .197 .198) (.197 .197 .198) (.193 .194 .192) (.189 .185)

FROM BOTTOM TO TOP	CONE	N .267	E .266
starting UNDER MANWAY		S .269	W .263

T- 37A

Storage Tank Inspection Record

Sheet: 1 Of 1
Job No.
Date: 9/6/95
By: R. R. Haavig
Year Built: 1988

Facility: SAFETY KLEEN
Location: 1445 w. 42nd Street
Type Inspection: Interior X Exterior
Item No. Code:
Service: PRODUCT STORAGE
Capacity: 7500 Tank Type: Piggyback stack tank cone bottom on

	Roof/Top Head	Wall/Shell	Floor/Bottom	Jacket
Matls:	304 SS	304 SS	304 SS	Fireproof Insulation

Wall/Shell Condition: Excellent
Roof Condition: Excellent
Bottom Condition: Excellent
Jacket Condition: Excellent
Support Type: Supported by T - 37B
Foundation Condition: Excellent
Internal Structure Condition: Excellent
Welded/Flanged Joint Condition: Excellent
Nozzle Condition: Excellent
Lining/Coating Condition: N/A
Insulation Condition: Hairline cracks in insulation material
Safety Valve Condition: N/A
Signs of Cracks: None
Signs of Leakage: None
Signs of Corrosion: None
Signs of Erosion: None
Test? No Type: Results:
Operating Conditions: Max. Temp. 150 C Max. Press. 3/4" Vac. 3/4"
Reference Inspection Records:

Comments: Tank is in excellent condition.

Thickness Readings: (.259) (.197 .200 .197) (.195 .197 .192) (.196 .198)

North underside of manway from bottom

Cone	N .275
Bottom	S .271
	E .265
	W .272

T- 37B

Storage Tank Inspection Record

Sheet: 1 Of 1
Job No.
Date: 9/6/95
By: R. R. Haavig
Year Built: 1988

Facility: SAFETY KLEEN
Location: 1445 w. 42nd Street
Type Inspection: Interior X Exterior
Item No. Code:
Service: Product Storage Tank
Capacity: 7500 Tank Type: Piggyback SS vertical top stack

	Roof/Top Head	Wall/Shell	Floor/Bottom	Jacket
	Slight cone		Cone	
Matls:	304 SS	304 SS	304 SS	None

Wall/Shell Condition: Excellent
Roof Condition: Excellent
Bottom Condition: Excellent
Jacket Condition: None
Support Type: Steel skirt
Foundation Condition: Excellent
Internal Structure Condition: Excellent
Welded/Flanged Joint Condition: Excellent
Nozzle Condition: Excellent
Lining/Coating Condition: None
Insulation Condition: None
Safety Valve Condition: N/A
Signs of Cracks: N/A
Signs of Leakage: None
Signs of Corrosion: None
Signs of Erosion: None
Test? No Type: Results:
Operating Conditions: Max. Temp. 150 C Max. Press. 3/4" Vac. 3/4"
Reference Inspection Records:

Comments: Tank is in excellent condition.

Thickness Readings: (.195) (.196 .198) (.193 .198 .196) (.195 .197)

North underside of manway from bottom Cone

N .281
S .280
E .278
W .281

T-38

Storage Tank Inspection Record

Sheet: 1 Of 1

Facility: Safety Kleen Chicago Recycle
Job No.
Location: 1445 W. 42nd Street
Date: 9/6/95
Type Inspection: Interior X Exterior
By: R.R.Haavig
Item No. Code:
Year Built:
Service: Product Storage Tank
Capacity: 1500 Tank Type: SS vertical tank

	Roof/Top Head	Wall/Shell	Floor/Bottom	Jacket
	Slight cone		Cone	
Matls:	304 SS	304 SS	304 SS	None

Wall/Shell Condition: Slight pitting in walls (3rd & 4th plate from bottom) Approx. 1/16" deep
Roof Condition: Excellent
Bottom Condition: Excellent
Jacket Condition: N/A
Support Type: Steel skirt w/ fireproof insulation *minor hairline cracks
Foundation Condition: Excellent
Internal Structure Condition: Excellent
Welded/Flanged Joint Condition: Excellent
Nozzle Condition: Excellent
Lining/Coating Condition: N/A
Insulation Condition: N/A
Safety Valve Condition: N/A
Signs of Cracks: None
Signs of Leakage: None
Signs of Corrosion: None
Signs of Erosion: None

Test? No Type: Results:
Operating Conditions: Max. Temp. 150 C Max. Press. 3/4" Vac. 3/4"

Reference Inspection Records:

Comments: Tank is in excellent condition

Thickness Readings: (.267 .266 .265) (.214 .224 .216) (.200 .211 .204) (.219 .222 .213) (.216 .223 .221)

From the bottom under man way

Cone	N .256
Bottom	S .252
	E .254
	W .251

T- 39

Storage Tank Inspection Record

Sheet: 1 Of 1

Facility: SAFETY KLEEN (CHICAGO RECYCLE)
Job No.

Location: 1445 W. 42nd STREET
Date: 9/26/95

Type Inspection: Interior X Exterior
By: R.R. HAAVIG

Item No. Code:
Year Built: 1988

Service: PRODUCT STORAGE TANK (PERMIT FOR HAZARDOUS WASTE)

Capacity: 15000 Tank Type: CARBON STEEL

	Roof/Top Head	Wall/Shell	Floor/Bottom	Jacket
	SLIGHT CONE			
Matls:	CARBON STEEL	CARBON STEEL	CARBON STEEL	N/A

Wall/Shell Condition: GOOD
Roof Condition: GOOD
Bottom Condition: GOOD
Jacket Condition: N/A
Support Type: STEEL SKIRT W/ FIREPROOF INSULATION
Foundation Condition: CONCRETE (EXCELLENT)
Internal Structure Condition: EXCELLENT
Welded/Flanged Joint Condition: GOOD
Nozzle Condition: GOOD
Lining/Coating Condition: N/A
Insulation Condition: N/A
Safety Valve Condition: N/A
Signs of Cracks: NONE
Signs of Leakage: NONE
Signs of Corrosion: NONE
Signs of Erosion: NONE
Test? NO Type: Results:
Operating Conditions: Max. Temp. 150 C Max. Press. 3/4" Vac. 3/4"
Reference Inspection Records:

Comments: TANK IS IN GOOD CONDITION.

Thickness Readings: (.296 .292 .294 .297) (.301 .295 .298 .296) (.295 .303 .301 .306)

FROM BOTTOM TO TOP	CONE	N .310	E .302
STARTING UNDER MANWAY		S .308	W .311

T-40A

Storage Tank Inspection Record

Sheet: 1 Of 1
Job No.
Date: 9/26/95
By: R.R.HAAVIG
Year Built: 1988

Facility: SAFETY KLEEN (CHICAGO RECYCLE)
Location: 1445 W. 42nd STREET
Type Inspection: Interior X Exterior
Item No. Code:
Service: PRODUCT STORAGE TANK
Capacity: 7500 Tank Type: PIGGYBACK CARBON STEEL STACK TANK

	Roof/Top Head	Wall/Shell	Floor/Bottom *CONE BOTTOM*	Jacket
Matls:	CARBON STEEL	CARBON STEEL	CARBON STEEL	N/A

Wall/Shell Condition: GOOD
Roof Condition: GOOD
Bottom Condition: GOOD
Jacket Condition: N/A
Support Type: SUPPORTED BY TANK 40B
Foundation Condition: CONCRETE (EXCELLENT CONDITION)
Internal Structure Condition: GOOD
Welded/Flanged Joint Condition: SLIGHT PITTING ON WELDS
Nozzle Condition: GOOD
Lining/Coating Condition: N/A
Insulation Condition: N/A
Safety Valve Condition: N/A
Signs of Cracks: NONE
Signs of Leakage: NONE
Signs of Corrosion: NONE
Signs of Erosion: NONE

Test? NO Type: Results:
Operating Conditions: Max. Temp. 150 C Max. Press. 3/4" Vac. 3/4"
Reference Inspection Records:

Comments: CARBON STEEL TANK IS IN GOOD CONDITION.

Thickness Readings: (.296 .292 .294 .295) (. 302 .297 .297)

FROM BOTTOM TO TOP	CONE	N. .298	E .291
STARTING UNDER MANWAY		S. .293	W .295

T- 40B

Storage Tank Inspection Record

Sheet: 1 Of 1
Job No.
Date: 9/26/95
By: R.R.HAAVIG
Year Built: 1988

Facility: SAFETY KLEEN (CHICAGO RECYCLE)
Location: 1445 W. 42nd STREET
Type Inspection: Interior X Exterior
Item No. Code:
Service: PRODUCT STORAGE (PERMIT FOR HAZARDOUS WASTE)
Capacity: 7500 Tank Type: PIGGYBACK STACK TANK

	Roof/Top Head	Wall/Shell	Floor/Bottom	Jacket
	SLIGHT CONE		CONE BOTTOM	FIREPROOF
Matls:	CARBON STEEL	CARBON STEEL	CARBON STEEL	INSULATION

Wall/Shell Condition: GOOD (SLIGHT PITTING APPROX. 1/16" DEEP)
Roof Condition: EXCELLENT
Bottom Condition: GOOD
Jacket Condition: GOOD (FIREPROOF INSULATION) *HAIRLINE CRACKS*
Support Type: STEEL SKIRT
Foundation Condition: CONCRETE (EXCELLENT)
Internal Structure Condition: EXCELLENT
Welded/Flanged Joint Condition: GOOD
Nozzle Condition: GOOD
Lining/Coating Condition: N/A
Insulation Condition: N/A
Safety Valve Condition: N/A
Signs of Cracks: NONE
Signs of Leakage: NONE
Signs of Corrosion: NONE
Signs of Erosion: SLIGHT
Test? NO Type: Results:
Operating Conditions: Max. Temp. 150 C Max. Press. 3/4" Vac. 3/4"
Reference Inspection Records:

Comments: CARBON STEEL TANK IS IN GOOD CONDITION.

Thickness Readings: (.290 .289 .291) (.288 .287 .289)

FROM BOTTOM TO TOP	CONE	N .298	E .298
STARTING UNDER MANWAY		S .297	W .298

T- 41A

Storage Tank Inspection Record

Sheet: 1 Of 1

Facility: SAFETY KLEEN (CHICAGO RECYCLE)
Job No.
Location: 1445 W. 42nd STREET
Date: 10/9/95
Type Inspection: Interior X Exterior
By: R.R.HAAVIG
Item No. Code:
Year Built: 1987
Service: PRODUCT STORAGE (PERMIT FOR HAZARDOUS WASTE)
Capacity: 7500 Tank Type: PIGGY BACK VERTICAL STACK TANK

	Roof/Top Head	Wall/Shell	Floor/Bottom	Jacket
Matls:	CARBON STEEL	CARBON STEEL	CARBON STEEL	N/A

Wall/Shell Condition: GOOD (SLIGHT PITTING)
Roof Condition: GOOD
Bottom Condition: GOOD
Jacket Condition: N/A
Support Type: SUPPORTED BY TANK 41B
Foundation Condition: EXCELLENT (CONCRETE)
Internal Structure Condition: GOOD
Welded/Flanged Joint Condition: GOOD
Nozzle Condition: GOOD
Lining/Coating Condition:
Insulation Condition: N/A
Safety Valve Condition: N/A
Signs of Cracks: NONE
Signs of Leakage: NONE
Signs of Corrosion: SLIGHT
Signs of Erosion: NONE

Test? NO Type: Results:
Operating Conditions: Max. Temp. 150 C Max. Press. 3/4" Vac. 3/4"
Reference Inspection Records:

Comments: TANK IS OK TO USE

Thickness Readings: (.297 .298) (.295 .293 .291 .289 .281)

FROM TOP TO BOTTOM	CONE	N .290	E .279
BY MAN WAY		S .288	W .278

T- 41 B

Storage Tank Inspection Record

Sheet: 1 Of 1

Facility: SAFETY KLEEN (CHICAGO RECYCLE)

Job No.

Location: 1445 W. 42nd STREET

Date: 10/9/95

Type Inspection: Interior X Exterior

By: R.R.HAAVIG

Item No. Code:

Year Built: 1987

Service: PRODUCT STORAGE (PERMIT FOR HAZARDOUS WASTE)

Capacity: 7500 Tank Type: PIGGY BACK VERTICAL STACK TANK

	Roof/Top Head	Wall/Shell	Floor/Bottom	Jacket
Matls:	Carbon steel	Carbon steel	Carbon steel	Fireproof Insulation

Wall/Shell Condition: GOOD

Roof Condition: GOOD

Bottom Condition: GOOD

Jacket Condition: GOOD (SLIGHT HAIRLINE CRACKS)

Support Type: STEEL RING SKIRT W/ FIREPROOF INSULATION

Foundation Condition: CONCRETE

Internal Structure Condition: GOOD

Welded/Flanged Joint Condition: SLIGHT PITTING ON WELDS IN TANK

Nozzle Condition: SLIGHT PITTING ON WELDS IN TANK

Lining/Coating Condition: NONE

Insulation Condition: GOOD

Safety Valve Condition: N/A

Signs of Cracks: NONE

Signs of Leakage: NONE

Signs of Corrosion: SLIGHT CORROSION ON WALLS

Signs of Erosion: NONE

Test? NO Type: Results:

Operating Conditions: Max. Temp. 150 C Max. Press. 3/4" Vac. 3/4"

Reference Inspection Records:

Comments: TANK IS OK TO USE

Thickness Readings: (.306 .313 .308) (.295 .291 .288 .285)

TOP TO BOTTOM	CONE	N .322	E .349
BY NORTH MAN WAY		S .308	W .334

T- 176 Tank Farm # 2
Storage Tank Inspection Record

Sheet: 1 Of 1

Facility: SAFETY KLEEN (CHICAGO RECYCLE)
Job No.
Location: 1445 W. 42nd Street
Date: 9/26/95
Type Inspection: Interior X Exterior
By: R.R.HAAVIG
Item No. Code:
Year Built: 1970
Service: PRODUCT STORAGE TANK (PERMIT FOR HAZARDOUS WASTE)
Capacity: 5500 Tank Type: VERTICAL Stainless Steel TANK

	Roof/Top Head	Wall/Shell	Floor/Bottom	Jacket
			SLIGHT CONE	
Matls:	304 S.S.	304 S.S.	304 S.S.	NONE

Wall/Shell Condition: MINOR PITTING
Roof Condition: GOOD
Bottom Condition: MINOR PITTING
Jacket Condition: N/A
Support Type: ROLLED 12" C-CHANNEL W/ THREE H-BEAM LEGS (Fireproof insulation)
Foundation Condition: CONCRETE (GOOD)
Internal Structure Condition: GOOD
Welded/Flanged Joint Condition: MINOR PITTING
Nozzle Condition: GOOD
Lining/Coating Condition: N/A
Insulation Condition: N/A
Safety Valve Condition: N/A
Signs of Cracks: NONE
Signs of Leakage: NONE
Signs of Corrosion: SLIGHT
Signs of Erosion: NONE
Test? NO Type: Results:
Operating Conditions: Max. Temp. AMBIENT Max. Press. 0 Vac. 0
Reference Inspection Records:

Comments: TANK HAS MINOR PITTING THROUGH OUT.
RESEMBLES SANDBLASTING W/ COARSE GRIT.

Thickness Readings: (.119 .117 .116 .115 .117)

FROM BOTTOM TO TOP	CONE	N .119	E .118
starting UNDER MANWAY		S .121	W .119

B-121

Cc: Maywood
USEPA

1.JD
M+S

safety-kleen®

CERTIFIED MAIL

December 7, 1995
AA95-58

Mr. Lawrence W. Eastep, P.E.
Manager
Permit Section
IEPA - Division of Land Pollution Control
2200 Churchill Road
Springfield, IL 62706

B.1.10

Re: Safety-Kleen Corporation Chicago Recycle Center
ILD 0005450697; Site #0316000053

Dear Mr. Eastep:

Safety-Kleen Corporation is hereby submitting the tanks inspection report pursuant to the requirements of the Part-B permit that was issued to the Chicago Recycle Center on September 30, 1992. Specifically, Section II, condition H.G.C. requires that Safety-Kleen should conduct an internal inspection of a specific portion of the hazardous waste storage tanks in Tank Farm #5 by the end of 1995 and submit the inspection reports to the agency.

As per this permit condition, the inspection performed by an independent, professional engineer is provided in the attachment. We believe this submittal satisfies the requirement of the permit. If you have any questions, please call me at (312) 247-2828.

Sincerely,

Alfred Aghapour

Alfred Aghapour
Facility Manager

AA:bb
Attachment

cc: Mark Schollenberger
Ed DeSocio
File: Chicago Part-B Correspondence

RECEIVED
DEC 15 1995
IEPA-BOL
PERMIT SECTION

1445 WEST 42ND STREET CHICAGO, ILLINOIS 60609 PHONE 312/ 247-2828

TANK INSPECTION REPORT

for

SAFELY-KLEEN CORPORATION
CHICAGO RECYCLE CENTER
1445 W. 42nd Street
Chicago, IL 60609

by

PROJECT RESOURCES, INC.

Professional Engineer: _____
James L. Bishop

License Number: 062-045960, State of Illinois

Date: [redacted]994

SECTION I

TEXT

SCOPE OF WORK

A complete visual inspection, both internal and external was performed for the Safely-Kleen Corporation, Chicago Recycle Center on nineteen hazardous waste storage tanks located in tank farm #4. In addition, thickness measurements were made using an ultrasonic instrument. All work was performed with the intent of certifying each tank for hazardous waste service.

FIELD WORK

Each tank was emptied, vented, and cleaned. All connections were blinded. A complete outside visual inspection was made. This included: check for leaks, check of all welds, check of the foundation and tank support, check of any insulation and/or fireproofing and operation of the safety vent system. Next a thickness profile was made of each tank using the ultrasonic instrument. Finally, a complete internal inspection was made. This included a check of the sidewall, roof and bottom surfaces with particular attention to the condition of all welds. A check of any internal items, such as: baffles, level gauge floats and dip tubes was also done.

QUALIFICATIONS

Project Resources, Inc. is a full service engineering firm specially in process and project engineering for the chemical, pharmaceutical, food, hazardous waste and petrochemical industries. Our personnel have conducted numerous tank inspections (installation, removal, aboveground, underground) and have certified these tanks for permitting purposes, closure, and on-going operations. Our technicians are fully trained and certified for tank inspection work including: 40 hour safety training, tank entry, certified welder.

CERTIFICATION

The nineteen (19) tanks in tank farm #4 have been fully inspected and are found to be in suitable condition for use as hazardous waste storage tanks.

RECEIVED
JAN 13 1995
IEPA - BOL
PERMIT SECTION

CERTIFICATION (cont.)

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

James L. Bishop, P.E.

Date: 12/12/94

SECTION II

STORAGE TANK INSPECTION RECORDS

TANKS INSPECTED

The following tanks were inspected by Project Resources, Inc.. The Storage Tank Inspection Records are included for each tank.

TANK NUMBERS

T-1	T-15
T-2	T-16
T-3	T-17
T-4	T-18
T-5	T-19
T-6	T-20
T-11	T-21
T-12	T-22
T-13	T-23
T-14	

T- 1

Storage Tank Inspection Record

Sheet: 1 of 1

Facility: SAFETY KLEEN CORPORATION

Job No. _____

Location: CHICAGO, ILLINOIS

Date: (9/30/94)

Type Inspection: Interior X Exterior X

By: R.R.HAAVIG

Item No. _____ Code: _____

Year Built: _____

Service: INTERNAL INSPECTION

Capacity: 12.500 Tank Type: STAINLESS STEEL

	Roof/Top Head	Wall/Shell	Floor/Bottom	Jacket
Matls:	304 SS	304 SS	304 SS	ALUM 2" INSUL.

Wall / Shell Condition: GOOD

Roof Condition: GOOD

Bottom Condition: GOOD *NOTE (SLIGHT PITTING)

Jacket Condition: GOOD

Support Type: STEEL SKIRT

Foundation Condition: GOOD

Internal Structure Condition: GOOD

Welded / Flanged Joint Condition: GOOD

Nozzle Condition: GOOD

Lining / Coating Condition: N/A

Insulation Condition: GOOD

Safety Valve Condition: N/A

Signs of Cracks: NO

Signs of Leakage: NO

Signs of Corrosion: NO

Signs of Erosion: NO

Test? NO Type: _____ Results: _____

Operating Conditions: Max. Temp _____ Max. Press. ATMOS. Vac. _____

Reference Inspection Records: _____

Comments: CLEANED DEBRIS FROM DRAIN NOZZLE
TANK IN GOOD CONDITION
BOTTOM WALLS WELD SEAMS & TOP AT MAN HOLE AREA

Thickness Readings T to B - .81 .79 .101 .103 .109 .110 .112 .116
CONE - N123 S126 E122 W125
FILL LINE - .124

T- 2

Storage Tank Inspection Record

Sheet: 1 of 1

Facility: SAFETY KLEEN RECYCLE

Job No. _____

Location: CHICAGO, IL

Date: 11/10/94

Type Inspection: Interior X Exterior X

By: R R HAAVIG

Item No. _____ Code: _____

Year Built: N/A

Service: HAZARDOUS WASTE PRODUCT STORAGE

Capacity: 12,500 GAL. Tank Type: STAINLESS STEEL VERTICAL STORAGE TANK

	Roof/Top Head	Wall/Shell	Floor/Bottom	Jacket
Matls:	304 SS	304 SS	304 SS	2"insul./alum.

Wall / Shell Condition: _____

Roof Condition: _____

Bottom Condition: _____

Jacket Condition: GOOD

Support Type: STEEL SKIRT RING WITH FIRE PROOF INSULATION

Foundation Condition: CONCRETE (GOOD CONDITION)

Internal Structure Condition: GOOD

Welded / Flanged Joint Condition: GOOD

Nozzle Condition: GOOD

Lining / Coating Condition: N/A

Insulation Condition: GOOD (TANK HAS COPPER TUBING HEAT TRACE UNDER INSUL.)

Safety Valve Condition: N/A

Signs of Cracks: NONE

Signs of Leakage: NONE

Signs of Corrosion: NONE

Signs of Erosion: NONE

Test? _____ Type: _____ Results: _____

Operating Conditions: Max. Temp. _____ Max. Press. ATMOS. Vac. _____

Reference Inspection Records: _____

Comments: TANK IS IN GOOD CONDITION

Thickness Readings TOP to BOTTOM-(.92-.89) (.91-.101) (.103-.102-.102) (.97-.99-.98)
CONE N.136 S.132 E.133 W.135
FILL LINE - .136

T- 3

Storage Tank Inspection Record

Sheet: 1 of 1

Facility: SAFETY KLEEN RECYCLE

Job No. _____

Location: CHICAGO, IL

Date: 12/01/94

Type Inspection: Interior X Exterior X

By: R.R.HAAVIG

Item No. _____ Code: _____

Year Built: _____

Service: PRODUCT STORAGE

Capacity: 12,500 gal. Tank Type: STAINLESS STEEL VERTICAL TANK

	Roof/Top Head	Wall/Shell	Floor/Bottom	Jacket
Matls:	304 DISHED	304	304 DISHED	N/A

Wall / Shell Condition: GOOD

Roof Condition: GOOD

Bottom Condition: GOOD

Jacket Condition: N/A

Support Type: STEEL SKIRT (FIREPROOF INSULATION)

Foundation Condition: CONCRETE

Internal Structure Condition: EXCELLENT

Welded / Flanged Joint Condition: GOOD

Nozzle Condition: GOOD

Lining / Coating Condition: N/A

Insulation Condition: N/A

Safety Valve Condition: N/A

Signs of Cracks: NONE

Signs of Leakage: NONE

Signs of Corrosion: NONE

Signs of Erosion: NONE

Test? NO Type: _____ Results: _____

Operating Conditions: Max. Temp. _____ Max. Press. ATMOS. Vac. _____

Reference Inspection Records: _____

Comments: TANK IS IN EXCELLENT CONDITION

Thickness Readings T to B-(.71 .71 .73)(.74 .73 .73)(.101 .103 .104)(.103 .104 .10

DISHED H

CONE - E.128 W.130 N.132 S.128

FILL LINE - .128

T- 4

Storage Tank Inspection Record

Sheet: 1 of 1

Facility: SAFETY KLEEN RECYCLE

Job No. _____

Location: CHICAGO, IL

Date: 12/8/94

Type Inspection: Interior X Exterior X

By: R.R.HAAVIG

Item No. _____ Code: _____

Year Built: _____

Service: HAZARDOUS WASTE STORAGE

Capacity: 12,500 gal. Tank Type: VERTICAL SS STORAGE TANK

	Roof/Top Head	Wall/Shell	Floor/Bottom	Jacket
Matls:	304 SS	304 SS	304 SS	2" ALUMINUM

Wall / Shell Condition: GOOD

Roof Condition: GOOD

Bottom Condition: GOOD

Jacket Condition: GOOD

Support Type: STEEL SKIRT FIREPROOF INSULATION

Foundation Condition: CONCRETE - GOOD

Internal Structure Condition: GOOD

Welded / Flanged Joint Condition: GOOD

Nozzle Condition: GOOD

Lining / Coating Condition: N/A

Insulation Condition: GOOD

Safety Valve Condition: N/A

Signs of Cracks: NONE

Signs of Leakage: NONE

Signs of Corrosion: NONE

Signs of Erosion: NONE

Test? NO Type: _____ Results: _____

Operating Conditions: Max. Temp. _____ Max. Press. ATMOS Vac. _____

Reference Inspection Records: _____

Comments: CLEANED OUT BROKEN SAMPLE BOTTLES ON BOTTOM OF TANK ABOVE DRAIN LINE

Thickness Readings T to B-(.79 .81)(.89 .86 .88)(.103 .105 .104)(.101 .103 .106)
CONE-(none) S.135 E.141 N.135 W.134
FILL LINE- at center of tank

T- 5

Storage Tank Inspection Record

Sheet: 1 of 1

Facility: SAFETY KLEEN RECYCLE

Job No. _____

Location: CHICAGO, IL

Date: 11/10/94

Type Inspection: Interior X Exterior X

By: R.R.HAAVIG

Item No. _____ Code: _____

Year Built: N/A

Service: PRODUCT STORAGE TANK

Capacity: _____ Tank Type: STAINLESS STEEL VERTICAL STORAGE TANK

	Roof/Top Head	Wall/Shell	Floor/Bottom	Jacket
Matls:	304 SS	304 SS	304 SS	N/A

Wall / Shell Condition: MINOR PITTING ON WALLS FROM TOP TO BOTTOM

Roof Condition: GOOD

Bottom Condition: FAIR (SLIGHT WARPAGE ON TWO SPOTS ON FLOOR)

Jacket Condition: N/A

Support Type: STEEL SKIRT WITH FIRE PROOF INSULATION

Foundation Condition: CONCRETE (GOOD CONDITION)

Internal Structure Condition: GOOD

Welded / Flanged Joint Condition: GOOD

Nozzle Condition: GOOD

Lining / Coating Condition: N/A

Insulation Condition: N/A

Safety Valve Condition: N/A

Signs of Cracks: NONE

Signs of Leakage: NONE

Signs of Corrosion: NONE

Signs of Erosion: NONE

Test? NO Type: _____ Results: _____

Operating Conditions: Max. Temp. _____ Max. Press. ATMOS. Vac. _____

Reference Inspection Records: _____

Comments: TANK IS IN FAIR CONDITION.
Tank will be suitable for service over the next five years until the next inspection.

Thickness Readings TOP to BOTTOM- (.107 .108 .108)(.91 .91 .91)(.90 .91 .91)
(.90 .91 .90)

CONE - N.100 S.99 E.105 W.103
FILL LINE - .99

T- 6

Storage Tank Inspection Record

Sheet: 1 of 1

Facility: SAFETY KLEEN RECYCLE

Job No.

Location: CHICAGO, IL

Date: 12/8/94

Type Inspection: Interior X Exterior X

By: R.R.HAAVIG

Item No. Code:

Year Built:

Service: HAZARDOUS WASTE HOLDING TANK

Capacity: 8000 gal. Tank Type: VERTICAL STORAGE

	Roof/Top Head	Wall/Shell	Floor/Bottom	Jacket
Matls:	304 SS	304 SS	304 SS	N/A

Wall / Shell Condition: GOOD

Roof Condition: GOOD

Bottom Condition: VERY GOOD

Jacket Condition: N/A

Support Type: STEEL RING SKIRTED WITH FIREPROOF INSULATION

Foundation Condition: CONCRETE GOOD CONDITION

Internal Structure Condition: GOOD

Welded / Flanged Joint Condition: GOOD

Nozzle Condition: GOOD

Lining / Coating Condition: N/A

Insulation Condition: N/A

Safety Valve Condition: N/A

Signs of Cracks: NONE

Signs of Leakage: NONE

Signs of Corrosion: NONE

Signs of Erosion: NONE

Test? NO Type: Results:

Operating Conditions: Max. Temp. Max. Press. ATMOS. Vac.

Reference Inspection Records:

Comments: VERY SHARP CONE BOTTOM
TANK SHOULD DRAIN VERY WELL

TANK HAS MIXER MOUNTED NEXT TO LOWER MANWAY

Thickness Readings T to B-(.192 .194 .190)(.191 .192 .192)(.192 .191 .189)
(.189 .186 .184)

CONE- E.184 S.185 N.182 W.183
FILL LINE- .184

T- 11

Storage Tank Inspection Record

Sheet: 1 of 1

Facility: SAFETY KLEEN CORPORATION

Job No. _____

Location: CHICAGO, ILLINOIS

Date: (9/30/94)

Type Inspection: Interior X Exterior X

By: R.R.HAAVIG

Item No. _____ Code: _____

Year Built: N/A

Service: INTERNAL INSPECTION THICKNESS READING ON CONE & ONE SIDE WALL

Capacity: 3500 GAL. Tank Type: STORAGE

	Roof/Top Head	Wall/Shell	Floor/Bottom	Jacket
Matls:	304 SS	304 SS	304 SS	ALUM JACKET 1½" INSUL.

Wall / Shell Condition: GOOD

Roof Condition: GOOD

Bottom Condition: GOOD

Jacket Condition: GOOD ON SIDE - CORROSION ON TOP NEXT TO MANWAY

Support Type: STEEL RING SKIRTED BASE - FIRE PROOF INSULATION

Foundation Condition: GOOD

Internal Structure Condition: GOOD

Welded / Flanged Joint Condition: GOOD

Nozzle Condition: GOOD

Lining / Coating Condition: N/A

Insulation Condition: GOOD

Safety Valve Condition: N/A

Signs of Cracks: NO

Signs of Leakage: NO

Signs of Corrosion: NO

Signs of Erosion: NO

Test? NO Type: _____ Results: _____

Operating Conditions: Max. Temp. _____ Max. Press. _____ Vac. _____

Reference Inspection Records: _____

Comments: TANK INTERNALS IN GOOD CONDITION

Thickness Readings T to B - .106 .107 .111 .110 .111 .106 .107 .105 .101

CONE - N104 S101 E100 W99

FILL LINE - .101

T- 12

Storage Tank Inspection Record

Sheet: 1 of 1

Facility: SAFETY KLEEN CORPORATION

Job No. _____

Location: CHICAGO, ILLINOIS

Date: 10/13/94

Type Inspection: Interior X Exterior X

By: R.R.HAAVIG

Item No. _____ Code: _____

Year Built: _____

Service: PRODUCT STORAGE TANK

Capacity: 3300 GALLONS Tank Type: STAINLESS STEEL VERTICAL

	Roof/Top Head	Wall/Shell	Floor/Bottom	Jacket
Matls:	304 SS	304 SS	304 SS	N/A

Wall / Shell Condition: GOOD

Roof Condition: GOOD

Bottom Condition: PITTING ON FLOOR (APPROX. ½ WAY THROUGH)

Jacket Condition: N/A

Support Type: STEEL SKIRT WITH FIRE PROOF INSULATION

Foundation Condition: GOOD

Internal Structure Condition: GOOD

Welded / Flanged Joint Condition: GOOD

Nozzle Condition: GOOD

Lining / Coating Condition: N/A

Insulation Condition: N/A

Safety Valve Condition: N/A

Signs of Cracks: NONE

Signs of Leakage: NONE

Signs of Corrosion: NONE

Signs of Erosion: NONE

Test? _____ Type: _____ Results: _____

Operating Conditions: Max. Temp. _____ Max. Press. ATMOS. Vac. _____

Reference Inspection Records: N/A

Comments: TANK WALLS & WELD SEAMS ARE IN EXCELLENT CONDITION

Tank will be suitable for service over the next five years until the next inspection.

Thickness Readings (TOP to BOTTOM AT MANWAY) .106 .105 .105 .104 .106 .106
.105 .104 .103 .107 .112

CONE - N.98 S.97 E.98 W.99
OVERHEAD LINE - .97
PIPE (NEXT TO WALL) - .99

T- 13

Storage Tank Inspection Record

Sheet: 1 of 1

Facility: SAFETY KLEEN CORPORATION

Job No. _____

Location: CHICAGO, ILLINOIS

Date: (9/30/94)

Type Inspection: Interior X Exterior X

By: R.R.HAAVIG

Item No. T-13 Code: _____

Year Built: _____

Service: PRODUCT STORAGE THICKNESS READING ON ONE WALL & CONE

Capacity: _____ Tank Type: STORAGE PRODUCT TANK

	Roof/Top Head	Wall/Shell	Floor/Bottom	Jacket
Matls:	304 SS	304 SS	304 SS	N/A

Wall / Shell Condition: GOOD

Roof Condition: GOOD

Bottom Condition: GOOD

Jacket Condition: N/A

Support Type: STEEL SKIRT (FIRE PROOF INSULATION)

Foundation Condition: (CONCRETE) GOOD

Internal Structure Condition: GOOD

* * Welded / Flanged Joint Condition: 12 HOLES IN CENTER SEAM & DOWN SEAM

Nozzle Condition: GOOD

Lining / Coating Condition: N/A

Insulation Condition: N/A

Safety Valve Condition: N/A

Signs of Cracks: NO

Signs of Leakage: NO

Signs of Corrosion: NO

Signs of Erosion: NO

* * Test? Yes Type: Water fill Results: Passed

Operating Conditions: Max. Temp. _____ Max. Press. ATMOS. Vac. _____

Reference Inspection Records: _____

Comments: CLEANED BOTTOM - FIX VARSC GAUGE FLOAT CABLE HOLES IN CENTER SEAM & VERTICAL DOWN ON BOTTOM (OPPOSITE MANWAY)

** 12 holes repaired and vessel tested. Tank will be suitable for service over the next five years until the next inspection.

Thickness Readings T to B - .106 .107 .104 .105 . . .

CONE - .104 .105 .106 .107

FILL LINE - .107

T- 14

Storage Tank Inspection Record

Sheet: 1 of 1

Facility: SAFETY KLEEN CORPORATION

Job No. _____

Location: CHICAGO, ILLINOIS

Date: 10/21/94

Type Inspection: Interior X Exterior X

By: R.R. HAAVIG

Item No. _____ Code: _____

Year Built: _____

Service: STAINLESS STEEL PRODUCT STORAGE TANK

Capacity: 3500 GALLONS Tank Type: VERTICAL CONE BOTTOM

	Roof/Top Head	Wall/Shell	Floor/Bottom	Jacket
Matls:	304 SS	304 SS	304 SS	N/A

Wall / Shell Condition: SLIGHT PITTING ON WALL BETWEEN 2nd & 3rd WELD SEAM FROM TOP

Roof Condition: GOOD

Bottom Condition: GOOD

Jacket Condition: N/A

Support Type: STEEL SKIRT (FIRE PROOF INSULATION ON SKIRT)

Foundation Condition: GOOD (CONCRETE)

Internal Structure Condition: GOOD

Welded / Flanged Joint Condition: GOOD

Nozzle Condition: GOOD

Lining / Coating Condition: N/A

Insulation Condition: N/A

Safety Valve Condition: N/A

Signs of Cracks: NONE

Signs of Leakage: NONE

Signs of Corrosion: NONE

Signs of Erosion: NONE

Test? NO Type: _____ Results: _____

Operating Conditions: Max. Temp. _____ Max. Press. ATMOS Vac. _____

Reference Inspection Records: N/A

Comments: CLEANED DEBRIS FROM DRAIN
TANK IS IN GOOD CONDITION

Thickness Readings (TOP to BOTTOM) - (.106 .107 .106) (.107 .106 .105) (.107 .104 .103) (.106 .108 .107)

CONE - N.106 S.108 E.106 W.104

FILL LINE - .105

T- 15

Storage Tank Inspection Record

Sheet: 1 of 1

Facility: SAFETY KLEEN CORPORATION

Job No. _____

Location: CHICAGO, ILLINOIS

Date: (9/30/94)

Type Inspection: Interior X Exterior X

By: R.R.HAAVIG

Item No. T-15 Code: _____

Year Built: N/A

Service: INTERNAL INSPECTION THICKNESS READING ON CONE & ONE SIDE WALL

Capacity: 3500 Tank Type: STORAGE

	Roof/Top Head	Wall/Shell	Floor/Bottom	Jacket
Matls:	304 SS	304 SS	304 SS	N/A

Wall / Shell Condition: GOOD

Roof Condition: GOOD INSIDE (BY VISUAL)

Bottom Condition: GOOD

Jacket Condition: NONE

Support Type: SKIRTED SUPPORT RING

Foundation Condition: OK

Internal Structure Condition: GOOD

Welded / Flanged Joint Condition: GOOD

Nozzle Condition: GOOD

Lining / Coating Condition: N/A

Insulation Condition: N/A

Safety Valve Condition: N/A

Signs of Cracks: NO

Signs of Leakage: NO

Signs of Corrosion: _____

Signs of Erosion: NO

Test? INTERNAL Type: _____ Results: _____

Operating Conditions: Max. Temp. _____ Max. Press. ATMOS. Vac. NO

Reference Inspection Records: _____

Comments: CLEANED OUT DEBRIS FROM SUCTION LINE AT BOTTOM OF TANK

Thickness Readings T to B - .90 .89 .89 .98 .100 .100 .98 .99 .98 .97

CONE - N104 .100 E104 .99 S105 W102

FILL LINE - .103

T- 16

Storage Tank Inspection Record

Sheet: 1 of 1

Facility: SAFETY KLEEN CORPORATION

Job No. _____

Location: CHICAGO, ILLINOIS

Date: 10/13/94

Type Inspection: Interior X Exterior X

By: R.R.HAAVIG

Item No. _____ Code: _____

Year Built: _____

Service: PRODUCT STORAGE TANK

Capacity: 3500 GALLONS Tank Type: VERTICAL STAINLESS STEEL STORAGE TANK

	Roof/Top Head	Wall/Shell	Floor/Bottom	Jacket
Matls:	304 SS	304 SS	304 SS	N/A

Wall / Shell Condition: EXCELLENT

Roof Condition: EXCELLENT

Bottom Condition: EXCELLENT

Jacket Condition: N/A

Support Type: STEEL SKIRT WITH FIRE PROOF INSULATION

Foundation Condition: GOOD

Internal Structure Condition: EXCELLENT

Welded / Flanged Joint Condition: EXCELLENT

Nozzle Condition: GOOD

Lining / Coating Condition: N/A

Insulation Condition: N/A

Safety Valve Condition: N/A

Signs of Cracks: NONE

Signs of Leakage: NONE

Signs of Corrosion: NONE

Signs of Erosion: NONE

Test? N/A Type: N/A Results: TEST NOT REQUIRED

Operating Conditions: Max. Temp. _____ Max. Press. ATMOS. Vac. _____

Reference Inspection Records: N/A

Comments: OVERHEAD LINE IN CENTER OF TANK IS NOT AT FLOOR LEVEL (AS OTHERS ARE IN THE TANK FARM).

Thickness Readings (TOP to BOTTOM) - .105 .103 .104 .103 .102 .103 .103
.103 .104 .102 .104 .103
CONE AT CENTER - N.76 S.78 E.77 W.78

T- 12

Storage Tank Inspection Record

Sheet: 1 of 1

Facility: SAFETY KLEEN RECYCLE

Job No. _____

Location: CHICAGO, IL

Date: 12/01/94

Type Inspection: Interior X Exterior X

By: R.R.HAAVIG

Item No. _____ Code: _____

Year Built: _____

Service: PRODUCT STORAGE (HAZARDOUS WASTE)

Capacity: 3500 gal. Tank Type: VERTICAL STORAGE

	Roof/Top Head	Wall/Shell	Floor/Bottom	Jacket
Matls:	304 SS	304 SS	replaced 304 SS	N/A

Wall / Shell Condition: GOOD

Roof Condition: GOOD

Bottom Condition: REPLACED

Jacket Condition: N/A

Support Type: STEEL SKIRT (FIREPROOF INSULATION)

Foundation Condition: GOOD (CONCRETE)

Internal Structure Condition: GOOD

Welded / Flanged Joint Condition: GOOD

Nozzle Condition: GOOD

Lining / Coating Condition: N/A

Insulation Condition: GOOD

Safety Valve Condition: N/A

Signs of Cracks: NONE

Signs of Leakage: NONE

Signs of Corrosion: NONE

Signs of Erosion: NONE

Test? NO Type: _____ Results: _____

Operating Conditions: Max. Temp. _____ Max. Press. ATMOS. Vac. _____

Reference Inspection Records: NONE AVAILABLE

Comments: TANK HAS HAD NEW BOTTOM + 6" UP SIDES Tank in good condition.
FIRST WELD SEAM HAS BEEN BANDED + WELDED ALSO
DENT IN TANK NEXT TO LOWER MANHOLE ON RIGHT SIDE Does not affect integrity. 2 VERTICAL SEAMS WELDED UP (APPROX. 5 FEET)

Thickness Readings T to B-(.98 .99 .99)(.101 .101 .102)(.99 .99 .98)(.98 .96 .94)
CONE - W.106 E.107 S.106 N.105
FILL LINE - .104

T- 18

Storage Tank Inspection Record

Sheet: 1 of 1

Facility: SAFETY KLEEN CORPORATION

Job No. _____

Location: CHICAGO, ILLINOIS

Date: 10/21/94

Type Inspection: Interior XX Exterior XX

By: R.R. HAAVIG

Item No. _____ Code: _____

Year Built: _____

Service: STAINLESS STEEL PRODUCT STORAGE TANK

Capacity: 3500 GALLONS Tank Type: _____

	Roof/Top Head	Wall/Shell	Floor/Bottom	Jacket
Matls:	304 SS	304 SS	304 SS	N/A

* Wall / Shell Condition: SLIGHT PITTING AND ONE HOLE IN SEAM ON TOP SHEET

Roof Condition: GOOD

Bottom Condition: GOOD (BUT TANK HAS SLIGHT FLOOR WARPAGE)

Jacket Condition: N/A

Support Type: STEEL SKIRT (FIRE PROOF INSULATION)

Foundation Condition: GOOD

Internal Structure Condition: GOOD

Welded / Flanged Joint Condition: GOOD

Nozzle Condition: GOOD

Lining / Coating Condition: NONE

Insulation Condition: NONE

Safety Valve Condition: NONE

Signs of Cracks: NONE

Signs of Leakage: NONE

Signs of Corrosion: NONE

Signs of Erosion: NONE

Test? YES Type: WATER Results: _____

Operating Conditions: Max. Temp. _____ Max. Press. ATMOS. Vac. _____

Reference Inspection Records: N/A

Comments: SLIGHT FLOOR WARPAGE
ONE HOLE IN SIDE WALL NEEDS REPAIR
Hole repaired - tank suitable for service for next five years until next inspection.

Thickness Readings (TOP to BOTTOM) - (.108 .107 .108) (.107 .106 .108) (.106 .105 .105) (.107 .107 .106)

CONE - N.94 S.96 E.96 W.96
FILL LINE - .96

T- 19

Storage Tank Inspection Record

Sheet: 1 of 1

Facility: SAFETY KLEEN CORPORATION

Job No. _____

Location: CHICAGO, ILLINOIS

Date: 10/21/94

Type Inspection: Interior X Exterior X

By: R.R. HAAVIG

Item No. _____ Code: _____

Year Built: _____

Service: STAINLESS STEEL PRODUCT STORAGE TANK

Capacity: 3500 GALLONS Tank Type: VERTICAL CONE BOTTOM

	Roof/Top Head	Wall/Shell	Floor/Bottom	Jacket
Matls:	304 SS	304 SS	304 SS	N/A

Wall / Shell Condition: GOOD

Roof Condition: GOOD

Bottom Condition: GOOD

Jacket Condition: N/A

Support Type: STEEL SKIRT (FIRE PROOF INSULATION)

Foundation Condition: GOOD (CONCRETE BASE)

Internal Structure Condition: GOOD

Welded / Flanged Joint Condition: GOOD

Nozzle Condition: GOOD

Lining / Coating Condition: N/A

Insulation Condition: N/A

Safety Valve Condition: N/A

Signs of Cracks: NONE

Signs of Leakage: NONE

Signs of Corrosion: NONE

Signs of Erosion: NONE

Test? NO Type: _____ Results: _____

Operating Conditions: Max. Temp. _____ Max. Press. ATMOS Vac. _____

Reference Inspection Records: N/A

Comments: CLEANED FLOOR DRAIN DEBRIS

TANK IS IN GOOD CONDITION

Thickness Readings (TOP to BOTTOM) - (.108 .106 .106)(.107 .104 .105)(.106 .104 .104)(.105 .105 .106)

CONE - N.105 S.109 E.106 W.105

FILL LINE - .105

T- 20

Storage Tank Inspection Record

Sheet: 1 of 1

Facility: SAFETY KLEEN CORPORATION

Job No. _____

Location: CHICAGO, ILLINOIS

Date: 10/21/94

Type Inspection: Interior X Exterior X

By: R.R. HAAVIG

Item No. _____ Code: _____

Year Built: _____

Service: STAINLESS STEEL PRODUCT STORAGE TANK

Capacity: 900 Tank Type: VERTICAL STORAGE DISHED HEAD BOTTOM & FLAT TO

	Roof/Top Head	Wall/Shell	Floor/Bottom	Jacket
Matls:	304 SS	304 SS	304 SS	N/A

Wall / Shell Condition: SLIGHT PITTING ON TOP ½ OF TANK

Roof Condition: GOOD

Bottom Condition: GOOD

Jacket Condition: N/A

Support Type: FOUR 3" PIPE LEGS WITH (FIRE PROOF INSULATION)

Foundation Condition: GOOD

Internal Structure Condition: GOOD

Welded / Flanged Joint Condition: GOOD

Nozzle Condition: GOOD

Lining / Coating Condition: N/A

Insulation Condition: N/A

Safety Valve Condition: N/A

Signs of Cracks: NONE

Signs of Leakage: NONE

Signs of Corrosion: NONE

Signs of Erosion: SLIGHT (AT FILL LINE PIPE)

Test? _____ Type: _____ Results: _____

Operating Conditions: Max. Temp. _____ Max. Press. ATMOS. Vac. _____

Reference Inspection Records: N/A

Comments: TANK HAS TOP MANHOLE ONLY
THIS TANK WAS A MIX TANK AT ONE TIME
HAS 4 BAFFLE PLATES & BRACES INSIDE

Thickness Readings (TOP to BOTTOM) - SOUTH WALL(.211 .193 .217)
1st RING (.190 .187) 2nd RING (.187 .192)
CONE - N.189 S.190 E.191 W.189
FILL LINE - .184

T- 21

Storage Tank Inspection Record

Sheet: 1 of 1

Facility: SAFETY KLEEN CORPORATION

Job No. _____

Location: CHICAGO, ILLINOIS

Date: 10/21/94

Type Inspection: Interior Y Exterior X

By: R.R.HAAVIG

Item No. _____ Code: _____

Year Built: _____

Service: STAINLESS STEEL PRODUCT STORAGE TANK

Capacity: 450 Tank Type: VERTICAL TANK (DIMPLE JACKET) DISHED HEADS TOP & BOTTOM

	Roof/Top Head	Wall/Shell	Floor/Bottom	Jacket
Matls:	304 SS	304 SS	304 SS	N/A

Wall / Shell Condition: SLIGHT PITTING IN WELD SEAMS ONLY

Roof Condition: GOOD

Bottom Condition: GOOD

Jacket Condition: N/A

Support Type: 3" PIPE LEG SUPPORTS (FIRE PROOF INSULATION)

Foundation Condition: CONCRETE

Internal Structure Condition: GOOD

Welded / Flanged Joint Condition: GOOD

Nozzle Condition: GOOD

Lining / Coating Condition: N/A

Insulation Condition: N/A

Safety Valve Condition: N/A

Signs of Cracks: NONE

Signs of Leakage: NONE

Signs of Corrosion: NONE

Signs of Erosion: NONE

Test? NO Type: _____ Results: _____

Operating Conditions: Max. Temp. _____ Max. Press. ATMOS. Vac. _____

Reference Inspection Records: N/A

Comments: TANK HAS TOP MANHOLE ONLY

THERE IS SLIGHT PITTING ON ALL HORIZONTAL WELD SEAMS, ESPECIALLY FIRST AND SECOND SEAM FROM THE BOTTOM DISH. Tank suitable for service for five years until the next inspection.

Thickness Readings (TOP to BOTTOM) - (.65 .70) (.94 .87 .74)
CONE - N.67 S.65 E.66 W.66
FILL LINE - .66

T- 22

Storage Tank Inspection Record

Sheet: 1 of 1

Facility: SAFETY KLEEN CORPORATION

Job No. _____

Location: CHICAGO, ILLINOIS

Date: (9/30/94)

Type Inspection: Interior X Exterior X

By: R.R.HAAVIG

SERIAL Item No. SP665862 Code: _____

Year Built: _____

Service: INTERNAL INSPECTION THICKNESS READING ON CONE & ONE SIDE WALL

Capacity: 3500 GAL. Tank Type: STORAGE TANK

	Roof/Top Head	Wall/Shell	Floor/Bottom	Jacket
Matls:	304 SS	304 SS	304 SS	NONE

Wall / Shell Condition: GOOD

Roof Condition: GOOD

Bottom Condition: GOOD

Jacket Condition: N/A

Support Type: STEEL SKIRT (FIRE PROOF INSULATION) GOOD CONDITION

Foundation Condition: GOOD

Internal Structure Condition: GOOD

Welded / Flanged Joint Condition: GOOD

Nozzle Condition: GOOD

Lining / Coating Condition: N/A

Insulation Condition: N/A

Safety Valve Condition: N/A

Signs of Cracks: NO

Signs of Leakage: NO

Signs of Corrosion: NO

Signs of Erosion: NO

Test? NO Type: _____ Results: _____

Operating Conditions: Max. Temp. _____ Max. Press. ATMOS. Vac. NO

Reference Inspection Records: _____

Comments: TANK IN GOOD CONDITION

Thickness Readings T to B - (at side manhole) - .137 .134 .134 .137 .138
.137 .109 .108 .111 .141 .144

COND - N129 S130 E126 W128
FILL LINE - .137

T- 23

Storage Tank Inspection Record

Sheet: 1 of 1

Facility: SAFETY KLEEN RECYCLE

Job No. _____

Location: CHICAGO, IL

Date: 11/10/94

Type Inspection: Interior X Exterior X

By: R.R.HAAVIG

Serial #
Item No. SP665861 Code: _____

Year Built: N/A

Service: PRODUCT STORAGE TANK

Capacity: 3500 GAL. Tank Type: STAINLESS STEEL VERTICAL STORAGE TANK

	Roof/Top Head	Wall/Shell	Floor/Bottom	Jacket
Matls:	304 SS	304 SS	304 SS	N/A

Wall / Shell Condition: TANK IS OUT OF ROUND IN TWO TOP SECTIONS

Roof Condition: DENTED BEHIND TOP MANWAY

Bottom Condition: CONE IS IN GOOD CONDITION

Jacket Condition: N/A

Support Type: STEEL RING SKIRT WITH FIRE PROOF INSULATION

Foundation Condition: CONCRETE (GOOD)

Internal Structure Condition: GOOD

Welded / Flanged Joint Condition: GOOD

Nozzle Condition: GOOD

Lining / Coating Condition: N/A

Insulation Condition: N/A

Safety Valve Condition: N/A

Signs of Cracks: NONE

Signs of Leakage: NONE

Signs of Corrosion: NONE

Signs of Erosion: NONE

Test? NO Type: _____ Results: _____

Operating Conditions: Max. Temp. _____ Max. Press. ATMOS. Vac. _____

Reference Inspection Records: CONSTRUCTED BY CERTIFIED EQUIPMENT & MFG. CO.

Comments: INTERNAL CONDITION OF TANK IS GOOD

Thickness Readings TOP to BOTTOM-(.134 .133 .134)(.134 .133 .133)(.131 .132 .131)(.141 .142 .141)

CONE- N.143 S.142 E.143 W.140

FILL LINE - .140

Inspection of
Safety Kleen Ground Storage Tanks

with

Calumet Testing Services, Inc.

Report No. CTS-931129
Project 2910

CERTIFICATION:

Engineer: Roger D. Sims, P.E.

Signature:

License Number: 15146 State: IN

Date: [redacted]1993

ROGER D. SIMS
REGISTERED
NO.
15146
STATE OF
INDIANA
PROFESSIONAL ENGINEER

SIMS PROFESSIONAL ENGINEERS

Table of Contents

		Page
1.0	Introduction	1
2.0	Inspection Procedures	1
3.0	Results and Conclusions	2
4.0	Certification	3

Appendix

A. Tank/Drum Inspection Records

1.0 Introduction

A visual interior inspection of sixteen (16) tanks was requested by Safety Kleen for their 42nd Street facility in Chicago, Illinois. Calumet Testing Services, Inc. was contracted to conduct the inspections and Sims Professional Engineers was engaged to certify the inspection process.

2.0 Inspection Procedures

Calumet Testings Services, Inc. is well qualified for this inspection on the basis of their training and experience. They followed common industry practices for such visual inspections including those guidelines found in the API document "Guide for Inspection of Refinery Equipment - Chapter XIII - Atmospheric and Low Pressure Storage Tanks".

Those inspections included but were not limited to:

1. weld undercuts
2. weld porosity
3. cracks
4. corrosion
5. deformation
6. thickness reduction
7. leaky valves

The technician visually inspected the interior of each tank and made occasional thickness measurements. (Safety Kleen makes annual thickness measurements for their own records.)

3.0 Results and Conclusions

The record of each inspection is documented in Appendix A. The procedure established with Safety Kleen included identifying problem areas of any given tank so that proper repairs are made and the tank is then reinspected.

Tank 195 was found to have badly corroded welds which were repaired and the tank then reinspected and found to be acceptable. Tank 170 was noted to have three (3) indentations around the tank from the North to East sides but otherwise acceptable. These indentations are acceptable and do not limit the acceptance of the tank's serviceability. Tank 171 required repair of the vertical weld to produce an acceptable tank. The minimal warping of Tank 104 is very acceptable.

The thickness reading of 0.147 of Tank 102 does not constitute an alarm or unacceptable condition. However, Safety Kleen should consult their thickness measurements to determine whether this tank is experiencing any significant corrosion over time and whether the tank is approaching the minimum service thickness.

The comment on the porosity found in Tank 176 is an indication that corrosion is present in the tank. While the conditions did not warrant repair or condemnation of the tank, Safety Kleen is advised to use their thickness measurements to determine the extent and progression of this corrosion.

Other than the aforementioned comments, the tanks were found to be acceptable. None of the aforementioned comments causes any of these tanks to be removed from service at this time but

monitored and evaluated as recommended above.

4.0 Certification

I hereby certify that Calumet Testing Services, Inc. properly and completely visually inspected the interior of sixteen (16) tanks at Safety Kleen in Chicago, Illinois. The complete findings of those inspections are contained herein along with appropriate engineering conclusions and recommendations.

Appendix A

Tank/Drum Inspection Records

TANK/DRUM INSPECTION RECORD

Sheet: 1 of 1
Job No. 6998
Date: 11-2-93
By: ANDERSON/SHADWELL
YEAR BUILT: —

CLIENT: SAFETY-KLEEN
PLANT LOCATION: CHICAGO, ILL
TYPE INSPECTION: INTERIOR X EXTERIOR ___
ITEM NO: TM5 CODE: API CHAPT. XIII
SERVICE: HAZERDOUS WASTE
CAPACITY: 20,000 GAL. TANK/DRUM TYPE: TANK FLAT BOTTOM

	ROOF/TOP HD.	WALL/SHELL	FLOOR/BOT.HD.	JACKET
MATLS:	C/S	C/S	C/S	N/A

WALL/SHELL CONDITION: N/A
ROOF/TOP HEAD CONDITION: N/A
BOTTOM/BOTTOM HEAD CONDITION: N/A
JACKET CONDITION: N/A
SUPPORT TYPE: N/A
FOUNDATION CONDITION: N/A
INTERNAL STRUCTURE CONDITION: SEE NOTE AT BOTTOM
WELDED/FLANGED JOINT CONDITION: SEE NOTE AT BOTTOM
NOZZLE CONDITION: N/A
LINING/COATING CONDITION: N/A
INSULATION CONDITION: N/A
SAFETY VALVE CONDITION: N/A
SIGNS OF CRACKS: NO
SIGNS OF LEAKAGE: NO
SIGNS OF CORROSION: WELDS WERE CORRODED, ALL WELDS HAVE BEEN REPLACED
SIGNS OF EROSION: N/A
TEST? NO TYPE: N/A RESULTS: N/A
OPERATING CONDITIONS: MAX TEMP: AMBIENT MAX PRESS: NONE VAC: NONE
REFERENCE INSPECTION RECORDS: SEE SAFETY KLEEN RECORDS

COMMENTS: UPON ORIGINAL VISUAL INSPECTION WELDS, WERE FOUND TO BE HIGHLY CORRODED, IF AT ALL THERE. I REEXAMINED TANK, ALL VERTICLE, AND CIRC WELDS HAVE BEEN RENEWLDED. SUB FLOOR HAS ALSO BEEN INSTALLED, WELD ON SUBFLOOR ARE VISUALLY ACCEPTABLE-

CARBON STEEL

T195

TANK/DRUM INSPECTION RECORD

Sheet: 1 of 1

CLIENT: SAFETY-KLEEN

Job No. 6998

PLANT LOCATION: CHICAGO, ILL

Date: 10-18-93

TYPE INSPECTION: INTERIOR X EXTERIOR ___

By: ANDERSON

ITEM NO: TNK 195 CODE: API CHAPT. ~~XIII~~

YEAR BUILT: N/A

SERVICE: HAZERDOUS WASTE

CAPACITY: 20000 GAL. TANK/DRUM TYPE: TANK FLAT BOTTOM

	ROOF/TOP HD.	WALL/SHELL	FLOOR/BOT.HD.	JACKET
MATLS:	C/S	C/S	C/S	N/A

WALL/SHELL CONDITION: ACCEPTABLE

ROOF/TOP HEAD CONDITION: ACCEPTABLE

BOTTOM/BOTTOM HEAD CONDITION: ACCEPTABLE

JACKET CONDITION: N/A

SUPPORT TYPE: ACCEPTABLE / CONCRETE

FOUNDATION CONDITION: ACCEPTABLE

INTERNAL STRUCTURE CONDITION: WELDS UNACCEPTABLE, NOT SUFFICIENT REINFORCEM

WELDED/FLANGED JOINT CONDITION: N/A

NOZZLE CONDITION: N/A

LINING/COATING CONDITION: N/A

INSULATION CONDITION: N/A

SAFETY VALVE CONDITION: N/A

SIGNS OF CRACKS: NO

SIGNS OF LEAKAGE: NO

SIGNS OF CORROSION: YES ALL WELDS ON INSIDE 50% TO 75% CORRODED

SIGNS OF EROSION:

TEST? — TYPE: — RESULTS: —

OPERATING CONDITIONS: MAX TEMP: AMBIENT MAX PRESS: NONE VAC: NONE

REFERENCE INSPECTION RECORDS:

COMMENTS: ALL INTERIOR SEAMS BEING REWELDED, WILL REEXAMINE AFTER REPAIR IS COMPLETE

THICKNESS READINGS ON BOTTOM CORD. .211, .208, .228, .233

TERA, INC.

CARBON STEEL

T194

TANK/DRUM INSPECTION RECORD

Sheet: 1 of 1

CLIENT: SAFETY-KLEEN

Job No. 6998

PLANT LOCATION: CHICAGO IL

Date: 10-18-93

TYPE INSPECTION: INTERIOR ✓ EXTERIOR ___

By: ANDERSON

ITEM NO: T194 CODE: API CHAPT. XIII

YEAR BUILT: N/A

SERVICE: HAZERDOUS WASTE

CAPACITY: ___ TANK/DRUM TYPE: DRUM

	ROOF/TOP HD.	WALL/SHELL	FLOOR/BOT.HD.	JACKET
MATLS:	CARBON STEEL	C/S	C/S	—

WALL/SHELL CONDITION: ACCEPTABLE

ROOF/TOP HEAD CONDITION: ACCEPTABLE

BOTTOM/BOTTOM HEAD CONDITION: ACCEPTABLE

JACKET CONDITION: N/A

SUPPORT TYPE: CONCRETE

FOUNDATION CONDITION: ACCEPTABLE

INTERNAL STRUCTURE CONDITION: ACCEPTABLE

WELDED/FLANGED JOINT CONDITION: ACCEPTABLE

NOZZLE CONDITION: N/A

LINING/COATING CONDITION: N/A

INSULATION CONDITION: N/A

SAFETY VALVE CONDITION: N/A

SIGNS OF CRACKS: NO

SIGNS OF LEAKAGE: NO

SIGNS OF CORROSION: NO

SIGNS OF EROSION: NO

TEST? ___ TYPE: ___ RESULTS: ___

OPERATING CONDITIONS: MAX TEMP: AMBIENT MAX PRESS: NONE VAC: NONE

REFERENCE INSPECTION RECORDS: ___

COMMENTS: WEST HEAD .475, EAST HEAD .476, TANK BODY .354 & .343.

TERA, INC.

T179

TANK/DRUM INSPECTION RECORD

Sheet: 1 of 1

CLIENT: SAFETY-KLEEN

Job No. 6998

PLANT LOCATION: CHICAGO, IL

Date: 10-18-93

TYPE INSPECTION: INTERIOR X EXTERIOR ___

By: ANDERSON

ITEM NO: T179 CODE: API CHAPT XIII

YEAR BUILT: N/A

SERVICE: HAZERDOUS WASTE

CAPACITY: 6500 GAL TANK/DRUM TYPE: TANK CONE BOTTOM

	ROOF/TOP HD.	WALL/SHELL	FLOOR/BOT.HD.	JACKET
MATLS:	STAINLESS STEEL	→	→	N/A

WALL/SHELL CONDITION: ACCEPTABLE

ROOF/TOP HEAD CONDITION: ACCEPTABLE

BOTTOM/BOTTOM HEAD CONDITION: ACCEPTABLE

JACKET CONDITION: N/A

SUPPORT TYPE: CONCRETE

FOUNDATION CONDITION: ACCEPTABLE

INTERNAL STRUCTURE CONDITION: ACCEPTABLE

WELDED/FLANGED JOINT CONDITION: N/A

NOZZLE CONDITION: N/A

LINING/COATING CONDITION: N/A

INSULATION CONDITION: N/A

SAFETY VALVE CONDITION: N/A

SIGNS OF CRACKS: NO

SIGNS OF LEAKAGE: NO

SIGNS OF CORROSION: NO

SIGNS OF EROSION: NO

TEST? — TYPE: — RESULTS: —

OPERATING CONDITIONS: MAX TEMP: AMBIENT MAX PRESS: NONE VAC: NONE

REFERENCE INSPECTION RECORDS:

COMMENTS:

TERA, INC.

T 170

TANK/DRUM INSPECTION RECORD

Sheet: 1 of 1

CLIENT: SAFETY-KLEEN

Job No. 6998

PLANT LOCATION: CHICAGO IL

Date: 9-16-93

TYPE INSPECTION: INTERIOR ✓ EXTERIOR ___

By: ANDERSON

ITEM NO: T170 CODE: API CHAPT XIII

YEAR BUILT: N/A

SERVICE: HAZERDOUS WASTE

CAPACITY: 3500 GAL. TANK/DRUM TYPE: CONE BOTTOM

ROOF/TOP HD. WALL/SHELL FLOOR/BOT.HD. JACKET

MATLS: COMPLETE TANK STAINLESS STEEL

WALL/SHELL CONDITION: SMOOTH, ACCEPTABLE

ROOF/TOP HEAD CONDITION: ACCEPTABLE

BOTTOM/BOTTOM HEAD CONDITION: ACCEPTABLE

JACKET CONDITION: N/A

SUPPORT TYPE: ANGLE IRON LEGS / ACCEPTABLE TO CONCRETE.

FOUNDATION CONDITION: ACCEPTABLE

INTERNAL STRUCTURE CONDITION: ACCEPTABLE

WELDED/FLANGED JOINT CONDITION: ACCEPTABLE

NOZZLE CONDITION: INTERNAL / ACCEPTABLE

LINING/COATING CONDITION: N/A

INSULATION CONDITION: N/A

SAFETY VALVE CONDITION: N/A

SIGNS OF CRACKS: NONE

SIGNS OF LEAKAGE: NONE

SIGNS OF CORROSION: NONE

SIGNS OF EROSION: NONE

TEST? — TYPE: — RESULTS: —

OPERATING CONDITIONS: MAX TEMP: AMBIENT MAX PRESS: NONE VAC: NONE

REFERENCE INSPECTION RECORDS:

COMMENTS: THREE INDENTATIONS FROM THE NORTH TO EAST SIDE OF TANK. THICKNESS MEASURMENTS = .097, .095, .096, AND .092

T171

TANK/DRUM INSPECTION RECORD

Sheet: 1 of 1

Job No. 6998

Date: 9-16-93

By: ANDERSON

YEAR BUILT: N/A

CLIENT: SAFETY-KLEEN

PLANT LOCATION: CHICAGO, IL

TYPE INSPECTION: INTERIOR X EXTERIOR ___

ITEM NO: T171 CODE: API CHAPT. XIII

SERVICE: HAZERDOUS WASTE

CAPACITY: 3100 GAL TANK/DRUM TYPE: CONE BOTTOM

	ROOF/TOP HD.	WALL/SHELL	FLOOR/BOT.HD.	JACKET
MATLS:	COMPLETE TANK	STAINLESS	STEEL	N/A

WALL/SHELL CONDITION: ACCEPTABLE

ROOF/TOP HEAD CONDITION: ACCEPTABLE

BOTTOM/BOTTOM HEAD CONDITION: ACCEPTABLE

JACKET CONDITION: N/A

SUPPORT TYPE: CONCRETE

FOUNDATION CONDITION: ACCEPTABLE

INTERNAL STRUCTURE CONDITION: ACCEPTABLE

WELDED/FLANGED JOINT CONDITION: ACCEPTABLE

NOZZLE CONDITION: INTERNAL / ACCEPTABLE

LINING/COATING CONDITION: N/A

INSULATION CONDITION: N/A

SAFETY VALVE CONDITION: N/A

SIGNS OF CRACKS: NONE

SIGNS OF LEAKAGE: NONE

SIGNS OF CORROSION: NONE

SIGNS OF EROSION: NONE

TEST? — TYPE: — RESULTS: —

OPERATING CONDITIONS: MAX TEMP: AMBIENT MAX PRESS: NONE VAC: NONE

REFERENCE INSPECTION RECORDS:

COMMENTS: SOUTH UPPER VERTICLE WELD WAS REJECTABLE BY VISUAL INSPECTION DUE TO INCOMPLETE PENETRATION. WELD WAS REPARED AND REEXAMINED (VISUALLY) AND ACCEPTED

THICKNESS READINGS ARE, .126, .125, .127

T 173

TANK/DRUM INSPECTION RECORD

Sheet: 1 of 1

CLIENT: SAFETY-KLEEN

Job No. 6998

PLANT LOCATION: Chicago IL

Date: 9-16-93

TYPE INSPECTION: INTERIOR ✓ EXTERIOR ___

By: ANDERSON

ITEM NO: T 173 CODE: API CHAPT XIII

YEAR BUILT: N/A

SERVICE: HAZERDOUS WASTE

CAPACITY: 5000 GAL TANK/DRUM TYPE: CONE BOTTOM

	ROOF/TOP HD.	WALL/SHELL	FLOOR/BOT.HD.	JACKET
MATLS:	Complete	TANK STAINLESS STEEL		

WALL/SHELL CONDITION: Smooth, Acceptable

ROOF/TOP HEAD CONDITION: Acceptable

BOTTOM/BOTTOM HEAD CONDITION: Acceptable

JACKET CONDITION: N/A

SUPPORT TYPE: ANGLE IRON Legs / Acceptable To Concrete

FOUNDATION CONDITION: ACCEPTABLE

INTERNAL STRUCTURE CONDITION: ACCEPTABLE

WELDED/FLANGED JOINT CONDITION: ACCEPTABLE

NOZZLE CONDITION: INTERNAL / ACCEPTABLE

LINING/COATING CONDITION: N/A

INSULATION CONDITION: N/A

SAFETY VALVE CONDITION: N/A

SIGNS OF CRACKS: NONE

SIGNS OF LEAKAGE: NONE

SIGNS OF CORROSION: NONE

SIGNS OF EROSION: NONE

TEST? No TYPE: ___ RESULTS: ___

OPERATING CONDITIONS: MAX TEMP: AMBENT MAX PRESS: NONE VAC: NONE

REFERENCE INSPECTION RECORDS: ___

COMMENTS: THICKNESS MEASURMENTS = .134, .136 AND .135

TERA, INC.

T180.

TANK/DRUM INSPECTION RECORD

Sheet: 1 of 1

CLIENT: SAFETY-KLEEN

Job No. 6998

PLANT LOCATION:

Date: 9-16-93

TYPE INSPECTION: INTERIOR ✓ EXTERIOR ___

By: ANDERSON

ITEM NO: T180 CODE: API CHAPT XIII

YEAR BUILT: N/A

SERVICE: HAZERDOUS WASTE

CAPACITY: 6500 GAL TANK/DRUM TYPE: CONE BOTTOM

	ROOF/TOP HD.	WALL/SHELL	FLOOR/BOT.HD.	JACKET
MATLS:	COMPLETE TANK	STAINLESS STEEL		

WALL/SHELL CONDITION: ACCEPTABLE

ROOF/TOP HEAD CONDITION: ACCEPTABLE

BOTTOM/BOTTOM HEAD CONDITION: ACCEPTABLE

JACKET CONDITION: N/A

SUPPORT TYPE: CONCRETE

FOUNDATION CONDITION: ACCEPTABLE

INTERNAL STRUCTURE CONDITION: ACCEPTABLE

WELDED/FLANGED JOINT CONDITION: ACCEPTABLE

NOZZLE CONDITION: INTERNAL ACCEPTABLE

LINING/COATING CONDITION: N/A

INSULATION CONDITION: N/A

SAFETY VALVE CONDITION: N/A

SIGNS OF CRACKS: NONE

SIGNS OF LEAKAGE: NONE

SIGNS OF CORROSION: NONE

SIGNS OF EROSION: NONE

TEST? NO. TYPE: ___ RESULTS: ___

OPERATING CONDITIONS: MAX TEMP: AMBIENT MAX PRESS: NONE VAC: NONE

REFERENCE INSPECTION RECORDS: ___

COMMENTS: THICKNESS MEASUREMENTS ARE, .191, .188, .193, .189

TANK/DRUM INSPECTION RECORD

Sheet: 1 of 1
Job No. 6998
Date: 8-31-93
By: ANDERSON/SHADWELL
YEAR BUILT: N/A

CLIENT: SAFETY-KLEEN
PLANT LOCATION: CHICAGO, IL
TYPE INSPECTION: INTERIOR X EXTERIOR ___
ITEM NO: TANK 104 CODE: API CHAPT XIII
SERVICE: WASTE WATER
CAPACITY: 8500 GALLONS TANK/DRUM TYPE: CONE BOTTOM

	ROOF/TOP HD.	WALL/SHELL	FLOOR/BOT. HD.	JACKET
MATLS:	STAINLESS STEEL	→		N/A

WALL/SHELL CONDITION: ACCEPTABLE
ROOF/TOP HEAD CONDITION: ACCEPTABLE
BOTTOM/BOTTOM HEAD CONDITION: ACCEPTABLE
JACKET CONDITION: NO JACKET
SUPPORT TYPE: CONCRET PAD
FOUNDATION CONDITION: ACCEPTABLE
INTERNAL STRUCTURE CONDITION: ACCEPTABLE
WELDED/FLANGED JOINT CONDITION: ACCEPTABLE
NOZZLE CONDITION: ACCEPTABLE
LINING/COATING CONDITION: NO COATING OR LINING
INSULATION CONDITION: NO INSULATION
SAFETY VALVE CONDITION: ___
SIGNS OF CRACKS: NONE
SIGNS OF LEAKAGE: NONE
SIGNS OF CORROSION: NONE
SIGNS OF EROSION: NONE
TEST? VE TYPE: VISUAL RESULTS: ACCEPTABLE
OPERATING CONDITIONS: MAX TEMP: 150° MAX PRESS: NONE VAC: NONE
REFERENCE INSPECTION RECORDS: ___

COMMENTS: THICKNESS READINGS ARE AS FOLLOWS, 1 BEING LOWEST TO ~~the~~ GROUND LEVEL / 1) .101 2) .107 3) .103 4) .105 5) .109 6) .112 7) .109 8) .107 TOP) .110
NOTE MINUTE WARPING ON BOTTOM

TANK/DRUM INSPECTION RECORD

Sheet: 1 of 1

CLIENT: SAFETY-KLEEN

Job No.: 6998

PLANT LOCATION: CHICAGO, IL

Date: 8-31-93

TYPE INSPECTION: INTERIOR X EXTERIOR ___

By: ANDERSON/SHADWELL

ITEM NO: TANK 103 CODE: API CHAPT. XIII

YEAR BUILT: N/A

SERVICE: ETHIL ACITATE

CAPACITY: 12500 GALLONS TANK/DRUM TYPE: CONE BOTTOM

	ROOF/TOP HD.	WALL/SHELL	FLOOR/BOT.HD.	JACKET
MATLS:	STAINLESS	STEEL	TYPICAL →	N/A

WALL/SHELL CONDITION: ACCEPTABLE

ROOF/TOP HEAD CONDITION: ACCEPTABLE

BOTTOM/BOTTOM HEAD CONDITION: ACCEPTABLE

JACKET CONDITION: N/A

SUPPORT TYPE: CONCRETE PAD

FOUNDATION CONDITION: ACCEPTABLE

INTERNAL STRUCTURE CONDITION: ACCEPTABLE

WELDED/FLANGED JOINT CONDITION: ACCEPTABLE

NOZZLE CONDITION: ACCEPTABLE

LINING/COATING CONDITION: NO COATING OR LINING

INSULATION CONDITION: NO INSULATION

SAFETY VALVE CONDITION: ___

SIGNS OF CRACKS: NONE

SIGNS OF LEAKAGE: NONE

SIGNS OF CORROSION: NONE

SIGNS OF EROSION: NONE

TEST? VE TYPE: VISUAL RESULTS: ACCEPTABLE

OPERATING CONDITIONS: MAX TEMP: 150° MAX PRESS: NONE VAC: NONE

REFERENCE INSPECTION RECORDS: ___

COMMENTS: THICKNESS READINGS ARE AS FOLLOWS, 1 BEING CLOSEST TO GROUND LEVEL. 1) .136 2) .108 3) .110 4) .109 5) .111 6) .079 7) .080 8) .086 9) .109

TANK/DRUM INSPECTION RECORD

Sheet: 1 of 1

CLIENT: SAFETY - KLEEN

Job No.: 6998

PLANT LOCATION: CHICAGO IL

Date: 8-31-93

TYPE INSPECTION: INTERIOR X EXTERIOR ___

By: ANDERSON, SHADRILL

ITEM NO: TANK 102 CODE: API CHAPT. XIII

YEAR BUILT: N/A

SERVICE: WASTE WATER

CAPACITY: 12500 GALLONS. TANK/DRUM TYPE: FLAT BOTTOM

	ROOF/TOP HD.	WALL/SHELL	FLOOR/BOT.HD.	JACKET
MATLS:	STAINLESS STEEL	STAINLESS STEEL	STAINLESS STEEL	N/A

WALL/SHELL CONDITION: SMOOTH NO CORROSION

ROOF/TOP HEAD CONDITION: SMOOTH NO CORROSION

BOTTOM/BOTTOM HEAD CONDITION: SMOOTH NO CORROSION

JACKET CONDITION: N/A

SUPPORT TYPE: CONCRETE PAD

FOUNDATION CONDITION: VERY GOOD

INTERNAL STRUCTURE CONDITION:

WELDED/FLANGED JOINT CONDITION: GOOD

NOZZLE CONDITION: GOOD

LINING/COATING CONDITION: NO LINING OR COATING

INSULATION CONDITION: NO INSULATION

SAFETY VALVE CONDITION:

SIGNS OF CRACKS: NO

SIGNS OF LEAKAGE: NO

SIGNS OF CORROSION: MINUTE CORROSION ON BOTTOM CIRC. WELD

SIGNS OF EROSION: NONE

TEST? VE TYPE: — RESULTS: GOOD ACCEPTABLE

OPERATING CONDITIONS: MAX TEMP: 150° MAX PRESS: NONE VAC: NONE

REFERENCE INSPECTION RECORDS:

COMMENTS: THICKNESS READINGS ARE AS FOLLOWS, 1 BEING LEASEST TO GROUND LEVEL. 1) .193 2) .199 3) .202 4) .198 5) .194 6) .195 7) .218 8) .207 9) .147 10) .205 TOP) .102

T174

TANK/DRUM INSPECTION RECORD

Sheet: 1 of 1

CLIENT: SAFETY-KLEEN

Job No. 6998

PLANT LOCATION: CHICAGO, IL.

Date: 9-27-93

TYPE INSPECTION: INTERIOR X EXTERIOR ___

By: ANDERSON

ITEM NO: T174 CODE: API CHAPT XIII

YEAR BUILT: N/A

SERVICE: HAZERDOUS WASTE

CAPACITY: N/A TANK/DRUM TYPE: DISH BOTTOM

	ROOF/TOP HD.	WALL/SHELL	FLOOR/BOT.HD.	JACKET
MATLS:	STAINLESS	STEEL	→	N/A

WALL/SHELL CONDITION: ACCEPTABLE

ROOF/TOP HEAD CONDITION: ACCEPTABLE

BOTTOM/BOTTOM HEAD CONDITION: ACCEPTABLE

JACKET CONDITION: N/A

SUPPORT TYPE: /

FOUNDATION CONDITION: ACCEPTABLE

INTERNAL STRUCTURE CONDITION: ACCEPTABLE

WELDED/FLANGED JOINT CONDITION: ACCEPTABLE

NOZZLE CONDITION: ACCEPTABLE

LINING/COATING CONDITION: N/A

INSULATION CONDITION: N/A

SAFETY VALVE CONDITION: N/A

SIGNS OF CRACKS: NONE

SIGNS OF LEAKAGE: NONE

SIGNS OF CORROSION: NONE

SIGNS OF EROSION: NONE

TEST? — TYPE: — RESULTS: —

OPERATING CONDITIONS: MAX TEMP: AMBIENT MAX PRESS: NONE VAC: NONE

REFERENCE INSPECTION RECORDS:

COMMENTS:

T172.

TANK/DRUM INSPECTION RECORD

Sheet: 1 of 1

CLIENT: SAFETY-KLEEN

Job No. 6998

PLANT LOCATION: CHICAGO IL

Date: 9-27-93

TYPE INSPECTION: INTERIOR X EXTERIOR ___

By: ANDERSON

ITEM NO: T172 CODE: API CHAPT XIII

YEAR BUILT: N/A

SERVICE: HAZERDOUS WASTE

CAPACITY: ___ TANK/DRUM TYPE: CONE BOTTOM

	ROOF/TOP HD.	WALL/SHELL	FLOOR/BOT.HD.	JACKET
MATLS:	STAINLESS	STEEL	→	N/A

WALL/SHELL CONDITION: ACCEPTABLE

ROOF/TOP HEAD CONDITION: ACCEPTABLE

BOTTOM/BOTTOM HEAD CONDITION: ACCEPTABLE

JACKET CONDITION: N/A

SUPPORT TYPE: LEGS TO CONCRETE

FOUNDATION CONDITION: ACCEPTABLE

INTERNAL STRUCTURE CONDITION: ACCEPTABLE

WELDED/FLANGED JOINT CONDITION: ACCEPTABLE

NOZZLE CONDITION: ACCEPTABLE

LINING/COATING CONDITION: N/A

INSULATION CONDITION: N/A

SAFETY VALVE CONDITION: N/A

SIGNS OF CRACKS: NONE

SIGNS OF LEAKAGE: NONE

SIGNS OF CORROSION: NONE

SIGNS OF EROSION: NONE

TEST? ___ TYPE: ___ RESULTS: ___

OPERATING CONDITIONS: MAX TEMP: AMBIENT MAX PRESS: NONE VAC: NONE

REFERENCE INSPECTION RECORDS: ___

COMMENTS: ___

T177

TANK/DRUM INSPECTION RECORD

Sheet: 1 of 1

CLIENT: SAFETY-KLEEN

Job No. 6988

PLANT LOCATION: CHICAGO, IL

Date: 9-27-93

TYPE INSPECTION: INTERIOR ✓ EXTERIOR ___

By: ANDERSON

ITEM NO: T177 CODE: API CHAPT ~~XIII~~

YEAR BUILT: N/A

SERVICE: HAZERDOUS WASTE

CAPACITY: ___ TANK/DRUM TYPE: CONE BOTTOM

	ROOF/TOP HD.	WALL/SHELL	FLOOR/BOT.HD.	JACKET
MATLS:	STAINLESS	STEEL	→	N/A

WALL/SHELL CONDITION: ACCEPTABLE

ROOF/TOP HEAD CONDITION: ACCEPTABLE

BOTTOM/BOTTOM HEAD CONDITION: ACCEPTABLE

JACKET CONDITION: N/A

SUPPORT TYPE: LEGS TO CONCRETE

FOUNDATION CONDITION: ACCEPTABLE

INTERNAL STRUCTURE CONDITION: ACCEPTABLE

WELDED/FLANGED JOINT CONDITION: ACCEPTABLE

NOZZLE CONDITION: ACCEPTABLE

LINING/COATING CONDITION: N/A

INSULATION CONDITION: N/A

SAFETY VALVE CONDITION: N/A

SIGNS OF CRACKS: NONE

SIGNS OF LEAKAGE: NONE

SIGNS OF CORROSION: NONE

SIGNS OF EROSION: NONE

TEST? — TYPE: — RESULTS: —

OPERATING CONDITIONS: MAX TEMP: AMBIENT MAX PRESS: NONE VAC: NONE

REFERENCE INSPECTION RECORDS: ___

COMMENTS: ___

TERA, INC.

T176

TANK/DRUM INSPECTION RECORD

Sheet: 1 of 1

CLIENT: SAFETY-KLEEN

Job No. 6998

PLANT LOCATION: CHICAGO, IL

Date: 6-27

TYPE INSPECTION: INTERIOR ✓ EXTERIOR ___

By: ANDERSON

ITEM NO: T176 CODE: API CHAPT. XIII

YEAR BUILT: N/A

SERVICE: HAZERDOUS WASTE

CAPACITY: ___ TANK/DRUM TYPE: CONE BOTTOM

	ROOF/TOP HD.	WALL/SHELL	FLOOR/BOT.HD.	JACKET
MATLS:	STAINLESS	STEEL →	→	N/A

WALL/SHELL CONDITION: ACCEPTABLE

ROOF/TOP HEAD CONDITION: ACCEPTABLE

BOTTOM/BOTTOM HEAD CONDITION: ACCEPTABLE

JACKET CONDITION: N/A

SUPPORT TYPE: LEGS TO CONCRETE

FOUNDATION CONDITION: ACCEPTABLE

INTERNAL STRUCTURE CONDITION: ACCEPTABLE

WELDED/FLANGED JOINT CONDITION: ACCEPTABLE

NOZZLE CONDITION: N/A

LINING/COATING CONDITION: N/A

INSULATION CONDITION: N/A

SAFETY VALVE CONDITION: N/A

SIGNS OF CRACKS: NONE

SIGNS OF LEAKAGE: NONE

SIGNS OF CORROSION: NONE

SIGNS OF EROSION: NONE

TEST? — TYPE: — RESULTS: —

OPERATING CONDITIONS: MAX TEMP: AMBIENT MAX PRESS: NONE VAC: NONE

REFERENCE INSPECTION RECORDS: ___

COMMENTS: WALLS, ROOF, AND BOTTOM IS VERY BUGGY. THICKNESS READINGS ARE .128, .126, .127

TANK/DRUM INSPECTION RECORD

Sheet: 1 of 1

CLIENT: SAFETY-KLEEN

Job No. 6998

PLANT LOCATION: CHICAGO IL

Date: 10-18-93

TYPE INSPECTION: INTERIOR X EXTERIOR ___

By: ANDERSON

ITEM NO: T125 CODE: API CHAPT. III

YEAR BUILT: N/A

SERVICE: HAZERDOUS WASTE

CAPACITY: ___ TANK/DRUM TYPE: TANK DISH BOTTOME

	ROOF/TOP HD.	WALL/SHELL	FLOOR/BOT.HD.	JACKET
MATLS:	STAINLESS STEEL	→	→	N/A

WALL/SHELL CONDITION: ACCEPTABLE

ROOF/TOP HEAD CONDITION: ACCEPTABLE

BOTTOM/BOTTOM HEAD CONDITION: ACCEPTABLE

JACKET CONDITION: N/A

SUPPORT TYPE: CONCRETE

FOUNDATION CONDITION: ACCEPTABLE

INTERNAL STRUCTURE CONDITION: ACCEPTABLE

WELDED/FLANGED JOINT CONDITION: N/A

NOZZLE CONDITION: N/A

LINING/COATING CONDITION: N/A

INSULATION CONDITION: N/A

SAFETY VALVE CONDITION: N/A

SIGNS OF CRACKS: NO

SIGNS OF LEAKAGE: NO

SIGNS OF CORROSION: NO

SIGNS OF EROSION: NO.

TEST? ___ TYPE: ___ RESULTS: ___

OPERATING CONDITIONS: MAX TEMP: AMBIENT MAX PRESS: NONE VAC: NONE

REFERENCE INSPECTION RECORDS: ___

COMMENTS: ___

TANK/DRUM INSPECTION RECORD

Sheet: 1 of 1

CLIENT: SAFETY-KLEEN

Job No. 6998

PLANT LOCATION: CHICAGO, ILL

Date: 10-18-93

TYPE INSPECTION: INTERIOR X EXTERIOR ___

By: ANDERSON

ITEM NO: T178 CODE: API CHAPT. VIII

YEAR BUILT: N/A

SERVICE: HAZERDOUS WASTE

CAPACITY: 6500 GAL TANK/DRUM TYPE: TANK CONE BOTTOM

	ROOF/TOP HD.	WALL/SHELL	FLOOR/BOT.HD.	JACKET
MATLS:	STAINLESS STEEL	→	→	N/A

WALL/SHELL CONDITION: ACCEPTABLE

ROOF/TOP HEAD CONDITION: ACCEPTABLE

BOTTOM/BOTTOM HEAD CONDITION: ACCEPTABLE

JACKET CONDITION: N/A

SUPPORT TYPE: CONCRETE

FOUNDATION CONDITION: ACCEPTABLE

INTERNAL STRUCTURE CONDITION: ACCEPTABLE

WELDED/FLANGED JOINT CONDITION: N/A

NOZZLE CONDITION: N/A

LINING/COATING CONDITION: N/A

INSULATION CONDITION: N/A

SAFETY VALVE CONDITION: N/A

SIGNS OF CRACKS: NO

SIGNS OF LEAKAGE: NO

SIGNS OF CORROSION: NO

SIGNS OF EROSION: NO

TEST? — TYPE: — RESULTS: —

OPERATING CONDITIONS: MAX TEMP: AMBIENT MAX PRESS: NONE VAC: NONE

REFERENCE INSPECTION RECORDS:

COMMENTS:

USEPA

B-121

D. 1.10

safety-kleen

RECEIVED
WMD RCRA
RECORD CENTER

Certified Mail

January 25, 1994
DMC 94-109

Mr. Lawrence W. Eastep, P.E.,
Manager
Permit Section
IEPA - Division of Land Pollution Control
2200 Churchill Road
Springfield, Illinois 62706

RE: Safety-Kleen Corp. Chicago Recycle Center
ILD 005450697; Site #0316000053

Dear Mr. Eastep:

Safety-Kleen Corp. is hereby submitting tank inspection report pursuant to the requirements of the Part B Permit that was issued to the Chicago Recycle Center on September 30, 1992. Specifically, Section II, Condition H.6.c. requires that Safety-Kleen conduct internal inspection of the hazardous waste storage tanks in Tank Farm #1, #2 and #3 by the end of 1993 and submit the inspection records to the Agency.

As per this permit condition the inspection performed by an independent, professional engineer is provided in the attachment. We believe this submittal satisfies the requirements of the permit. If you have any questions, please contact me at 708/468-2579.

Sincerely,

Desi M. Chari

Desi M. Chari
Environmental Affairs Program Manager

RECEIVED
FEB - 2 1994
IEPA - BOL
PERMIT SECTION

Attachment

cc: Mark Schollenberger
Alfred Aghapour
f: Chicago - Part B Corresp. & Notes 1994

1000 NORTH RANDALL ROAD ELGIN, ILLINOIS 60123-7857 PHONE 708/697-8460 FAX 708/468-8500