GEN/TSD/TRANS

RCRA LAND DISPOSAL RESTRICTIONS INSPECTION

I. General Information

Facility: SAFETY-KLEEN CHICAGO RC

U.S. EPA ID No.: ILD005450697 0316000053

Street: 1445 W. 42nd ST

City: CHICAGO State: IL Zip: 60609

Telephone: 312 247 2828

Inspection Date: 7/24/91 Time: 10A-345P (am/pm)

Weather Conditions: 80°F

	Name	Agency/Title	Telephone
Inspectors:	JAMES HAENNICKE	IEPA/LPS	708 531 5900
Facility Representatives:	ALFRED AGHAJEPOUR	FACILITY MGR	312 247 2828
	TED ZAJACK	OPERATIONS MGR	↓

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

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

* See Appendix A

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INSPECTION SUMMARY

Processes That Generate LDR Wastes:

DISTILLATION UNIT

FRACTIONATION UNITS

LIQUID - LIQUID EXTRACTION UNITS

WASTE WATER TREATMENT UNIT

FILTERING

LDR Waste Management:

S01 S02 FROM ON-SITE GENERATION + OFF-SITE WASTE

Summary: VIOLATIONS 722.134(a), 722.141(a)

Signature:

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
F001,2,3,5	___	✓
___	___	___
___	___	___

*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

NO PCB'S

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)]

ALSO, ALL SHIPMENTS ARE ANALYZED

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 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	SK CLARKSVILLE, MO; HEBRON, OH;
D001	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 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
F001-5	RECLAMATION	DISTILLATION + WASTEWATER
✓		TREATMENT UNITS

2. Are treatment residuals generated from these units?

Yes ✓ No ___

Comments STILL 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:

LAND DISPOSAL RESTRICTIONS INSPECTION

V. TRANSPORTER REQUIREMENTS

A. Does the transporter accumulate restricted wastes for more than 10 days? [40 CFR 268.50(a)(3)]

Yes ___ No ___

If yes, check the appropriate regulatory status:

___ Interim status for storage
___ RCRA permit for storage

(The TSD checklist must also be completed.)

If no, describe inventory controls to ensure that wastes are not stored for more than 10 days:

_____
_____
_____

B. Does the transporter mix or combine restricted wastes of different DOT shipping descriptions? [40 CFR 263.10(c)(2)]?

Yes ___ No ___

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

_____
_____
_____

C. Are restricted wastes treated in RCRA exempt units (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 or Process

Are treatment residuals generated from these units?

Yes ___ No ___

Comments_____

Are residuals further treated, stored for greater than 10 days, or disposed on site?

Yes ___ No ___ NA ___

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

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)]

NON SOLVENT

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: ACCUMULATED FOR BULK RECLAMATION FOR TOLLING AGREEMENT

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
_____	_____
_____	_____
_____	_____

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
F001-5	SR CLARKSVILLE, MO
D001	HEBRON, OH; DOLTON, 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]

NA 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
F005	SK FRANKLIN PARK, IL
D001	

   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:

_____
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Name of Facility: SAFETY KLEEN CORP - CHICAGO RC

I.D. Number: ILD005450697

Location: 1445 W 42nd ST

CHICAGO IL 60609

Date of Inspection: 7-24-91

Inspector: JAMES HAENNICKE

Telephone Number: 7085315900

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

Are there any known releases? Yes ____ No X

Does the unit receiving CERCLA waste meet the double liner requirements? Yes ____ No ____ N/A X

Any Class I violations? Yes X No ____

If yes, identify type briefly: 722 134 G) DRUMS OF WASTE FILTERS (F001, 2, 3, 5) LABELED NON HAZARDOUS WASTE WHILE ON SITE. BEFORE TRANSPORT CHANGED TO HAZ WASTE LABEL. RESOLVED DURING INSPECTION

Schedule for next inspection: JANUARY-92

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

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, 2, 3, 5

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.

Illinois Environmental Protection Agency
Division of Land Pollution Control

RCRA INSPECTION REPORT

USEPA #: IL 0 0 0 5 4 5 0 6 9 7	IEPA #: 0 3 2 6 0 0 0 0 5 3
Facility Name: SAFETY-KLEEN CORP CHICAGO RC	Phone #: 312 247 2828
Street Address: 1445 W 42ND ST	County: COOK
City: CHICAGO	State: IL Zip: 60609
Region: 2	Inspection Date: 7/24/91 From: 10AM To: 345PM
Weather: 80°F	

TYPE OF FACILITY

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

TYPE OF INSPECTION

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

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

NON-REGULATED STATUS

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

PART A

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

Initial Part A Date: 11/19/80 Amended: 12/20/89

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

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 NA

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	Y	Y	Y	NO	Y	NA	Y	Y	N
S02	Y	Y	Y	NO	Y	NA	Y	N	N
R03	NA	Y	Y	NA	Y	725.101(c)(6)	N	N	Y

RECEIVED
- 9 AUG 1991
IEPA/DLPC

IL 532-1834

Facilit me: SAFETY-KLEEN CHGO RC

USEPA #. ILD 005450697

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 MAT'L FROM DISTIL. PROCESS	EACH SHIPMENT ANAL	F001 F002 F003 F005	Y	Y	G F	G F	G F	2820 GALS	20-30 THOU GAL/MONTH	7-18-91	SK CLARKSVILLE, MO BLENDING/RECLAMATION
MISC. DRUMMED WASTE	DRIPPINGS TANK CLEAN OUTS TANK BOTTOMS OIL WRY ETC.	↓	F001 F002	↓	↓	G F	G F	G F	203 DRMS	200-300 DRMS/YR	4-30-91	SK HEBRON, OH BLENDING/RECLAMATION
REMANIFESTED WASTE	TEMP. STORAGE FURTHER RECLAMATION SENT IN ERROR		D001 F001 F002			G F	G F	G F	0	50,000 GAL/YR	7-9-91	SK DOLTON, IL BLENDING/RECLAMATION
FILTERS	FILTER WASTE + ABSORBENT	↓	F001 F002 F003 F005			G F	G F	G F	21 DRMS	100 150 DRMS/YR	4-30-91	SK HEBRON, OH TREATMENT
SPENT SOLVENT	2 PARTS WASHERS 1 IMMERSION CLEANER	BULK ANAL IN FRANKLIN PK.	D001 F005	↓	↓	G F	G F	G F	0	~50 GAL/MONTH	6-17-91	SK · FRANKLIN PARK, IL STORAGE BEFORE 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				
						G F	G F	G F				

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

Safety-Kleen Corp. Chgo RC
0316000053 - Cook County
July 24, 1991

NARRATIVE

Safety-Kleen Corp. 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 constitues approximately 70 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.

<u>Hazardous Wastes</u>

1. Still Bottoms (F001, F002, F003, F005)
   - Residual material from the distillation process.
   - Approximately 20,000 to 30,000 gallons are generated per month.
   - Shipped to Safety-Kleen in Clarksville, MO for fuel blending or further reclamation.
   - 1 to 2 shipments are made every week.
   - 2820 gallons were on site in bulk storage.

Hazardous Waste Units

1. Truck Stations #1, #2 and #3
   - Used for loading and unloading of waste materials.
   - Truck Station #1 is used for tankers; Truck Station #2 and #3 are used for truck trailers.
   - All are fitted with a concrete floor, curbs and walls.
   - Truck Station #1 is covered with a roof which prevents stormwater from coming into contact with hazardous wastes or contaminated areas.

2. 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.

3. 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 a resistant coating as an addition to the existing secondary containment.

Note 1 - Tanks T105 - T114 from Tank Farm 1 and Tank 199 from container storage area were closed in accordance with their approved closure plan and confirmed by the Agency on March 26, 1991.

Note 2 - Tanks T190 - T193 from Tank Farm 3 have been cleaned and removed. Safety-Kleen is waiting for engineer certification prior to gaining agency approval and verification.

APPARENT VIOLATIONS

*722.134(a) - Drums of hazardous waste filters not labelled with words "Hazardous waste".

722.141(a) - Spent solvent from parts washers and immersion cleaner not included in annual report.

* This violation resolved during inspection. All waste filter drums in accumulation areas and container storage area labelled with words "Hazardous waste".

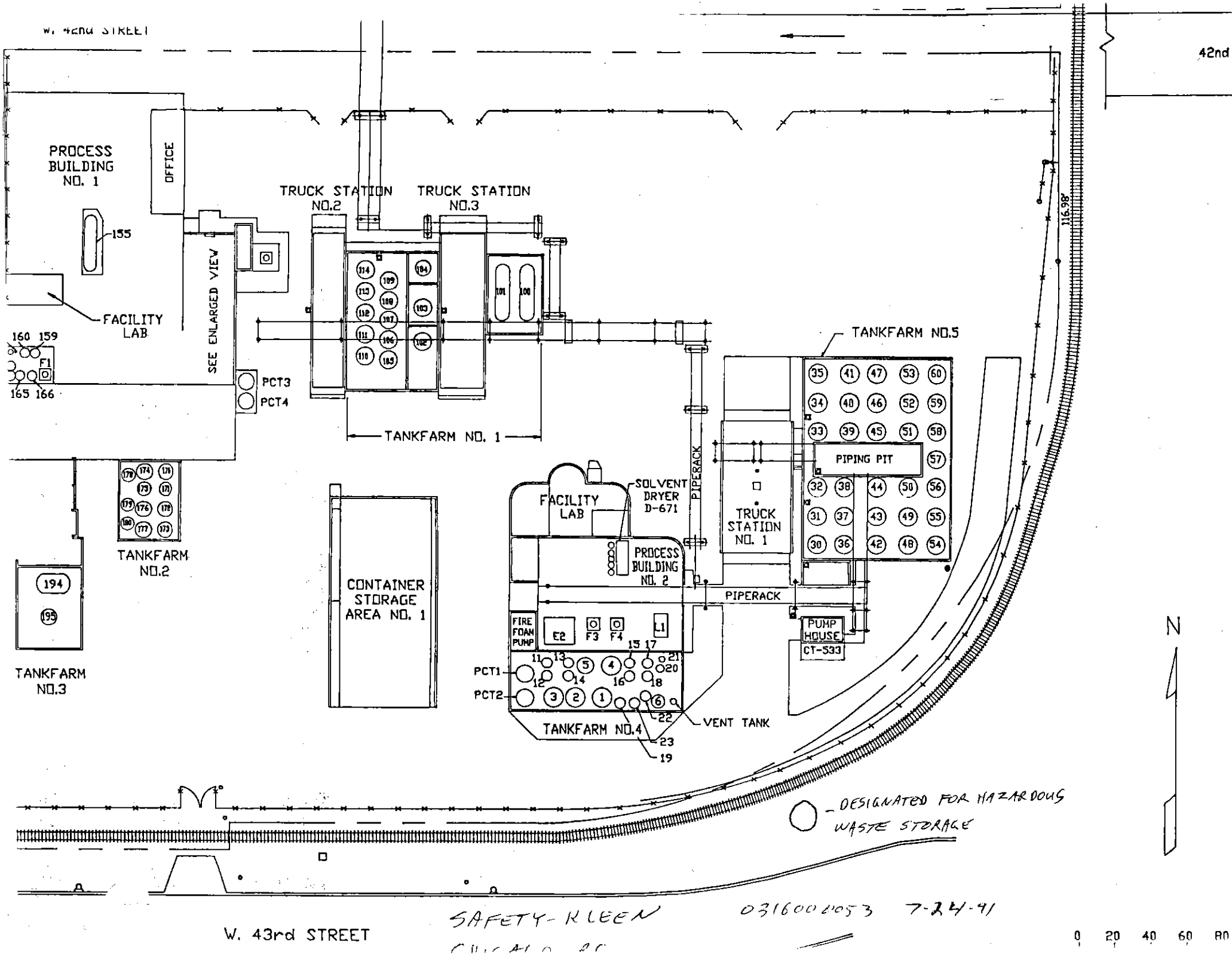
JH:fs:33

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) tank bottoms
     d) used oil dry.
     e) "cutters" - drums which must be cut open in order to remove solid material contained inside.
   - Approximately 200 to 300 drums are generated per year.
   - Shipped to Safety-Kleen in Clarksville, MO or Hebron, OH for fuel blending.
   - Shipments made approximately 3 times per year.
   - 203 drums 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 50,000 gallons are generated per year.
   - Shipped to Safety-Kleen in Dolton, IL or Safety-Kleen in Hebron, OH for reclamation.
   - Approximately five shipments are made each year.
   - Currently none on site.

4. Waste Filters (F001, F002, F003, F005)
   - Used to filter waste and product into and from tanks and containers.
   - 100 to 150 drums generated per year.
   - Shipped to Safety-Kleen in Hebron, OH.
   - Three shipments made per year.
   - 21 drums currently on site.

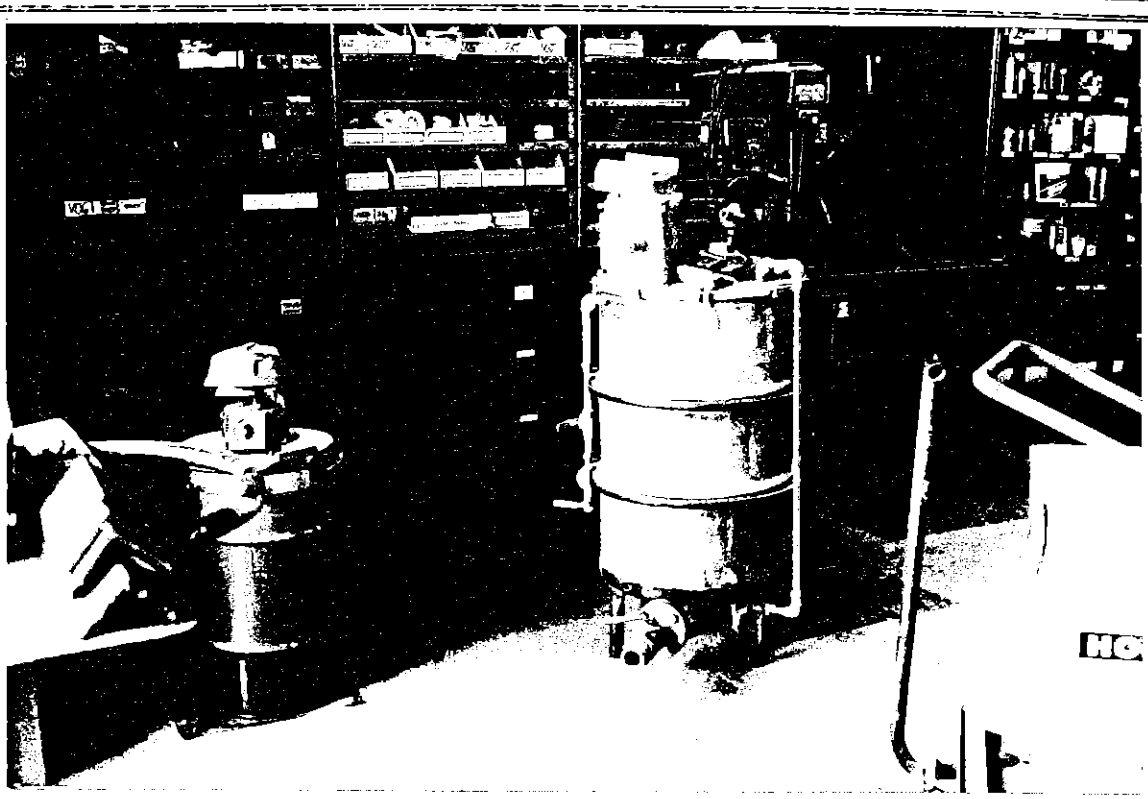
5. Spent Solvent (D001, F005)
   - 2 parts washers, 1 immersion cleaner.
   - Approximately 50 gallons/month generated.
   - Picked up monthly by Safety-Kleen in Franklin Park, IL.


W. 42nd STREET
42nd
PROCESS BUILDING NO. 1
OFFICE
155
FACILITY LAB
160 159
F1
165 166
SEE ENLARGED VIEW
PCT3
PCT4
TRUCK STATION NO.2
TRUCK STATION NO.3
TANKFARM NO. 1
TANKFARM NO.5
PIPING PIT
TRUCK STATION NO. 1
PIPERACK
SOLVENT DRYER D-671
FACILITY LAB
PROCESS BUILDING NO. 2
PIPERACK
PUMP HOUSE
CT-533
TANKFARM NO.2
TANKFARM NO.3
CONTAINER STORAGE AREA NO. 1
FIRE FOAM PUMP
E2
F3
F4
L1
PCT1
PCT2
TANKFARM NO.4
VENT TANK
116.98'
N
DESIGNATED FOR HAZARDOUS WASTE STORAGE
W. 43rd STREET
SAFETY-KLEEN
031600 2053 7-24-91
0 20 40 60 80

Illinois Environmental Protection Agency Photographs

Site Name: _____ IEPA #: _____

Date: _____ Time: _____ Photograph By: _____



Comments: S-R IMMERSION CLEANER - LEFT; PARTS WASHER - RIGHT

BOILER HOUSE Roll #: 92-21 Photo #: 7

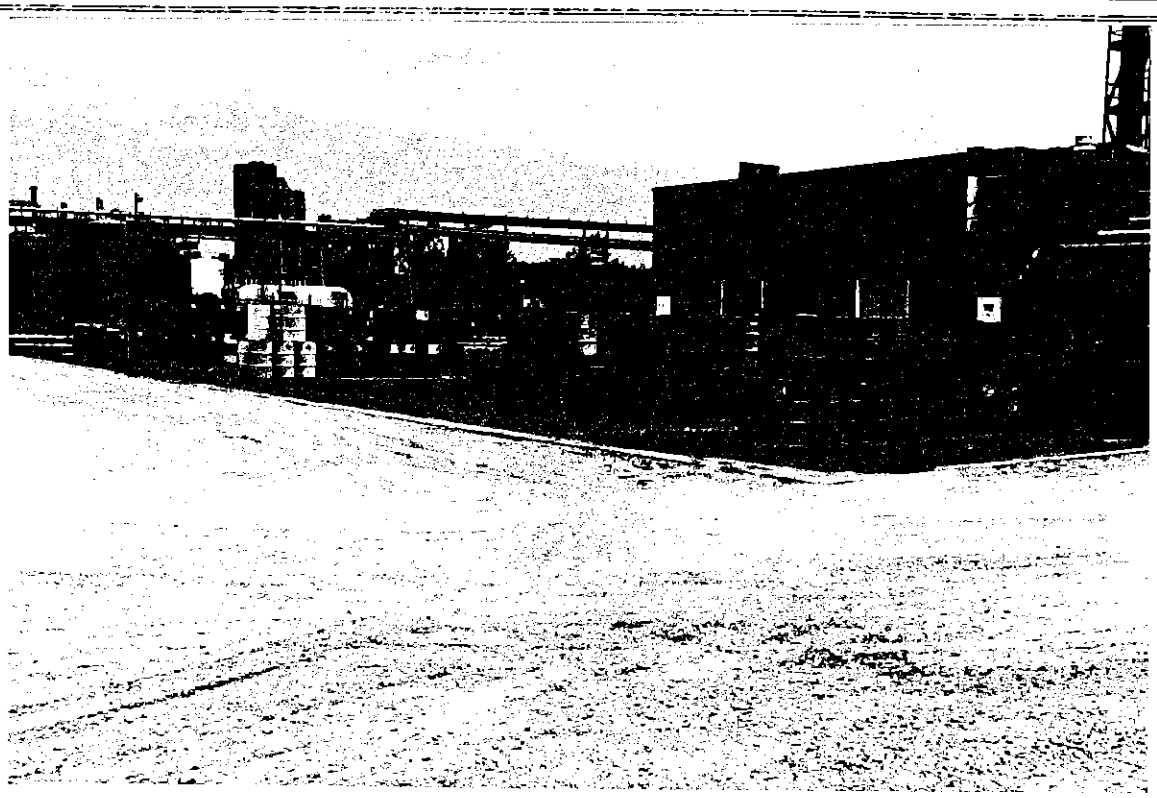
Comments: 2ND SR PARTS WASHER. BOILER HOUSE

Roll #: 92-21 Photo #: 8

Illinois Environmental Protection Agency Photographs

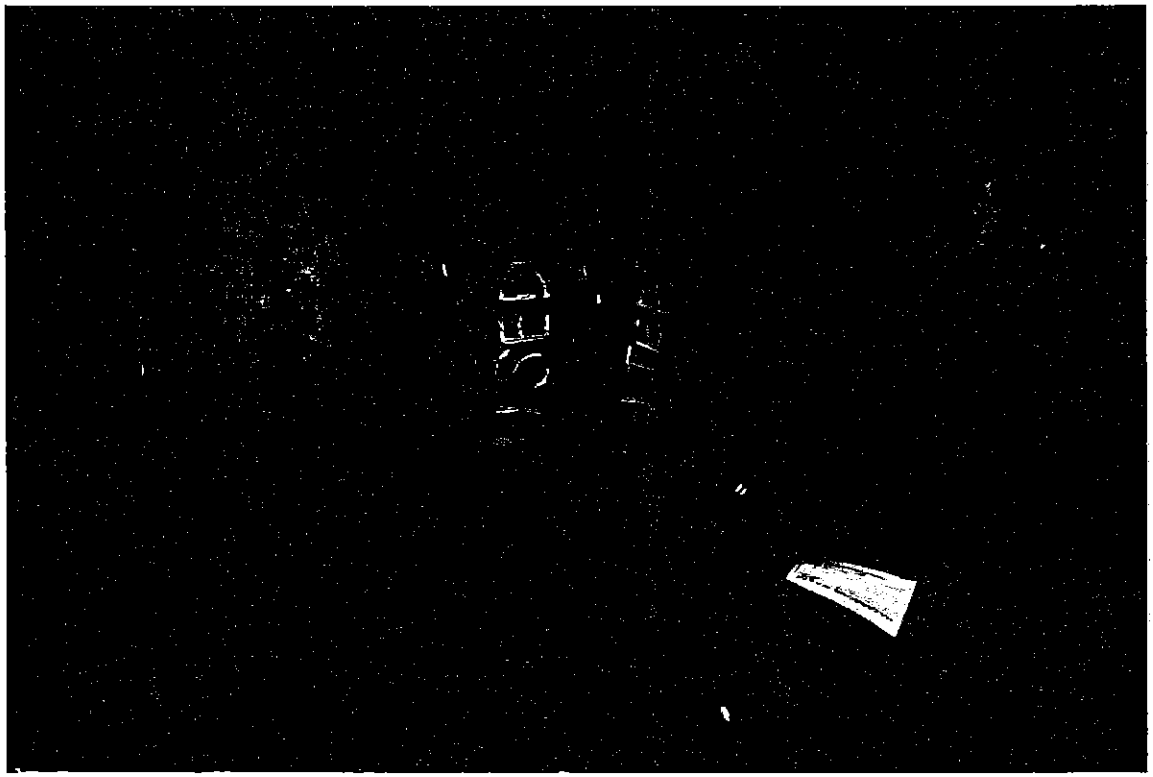
Site Name: SAFETY-KLEEN CORP CHICAGO RC IEPA #: 0316000053

Date: 7-24-91 Time: 10AM - 3:45PM Photograph By: JAMES HAENNICKE



Comments: NE - CONTAINER STORAGE AREA

Roll #: 92-21 Photo #: 5



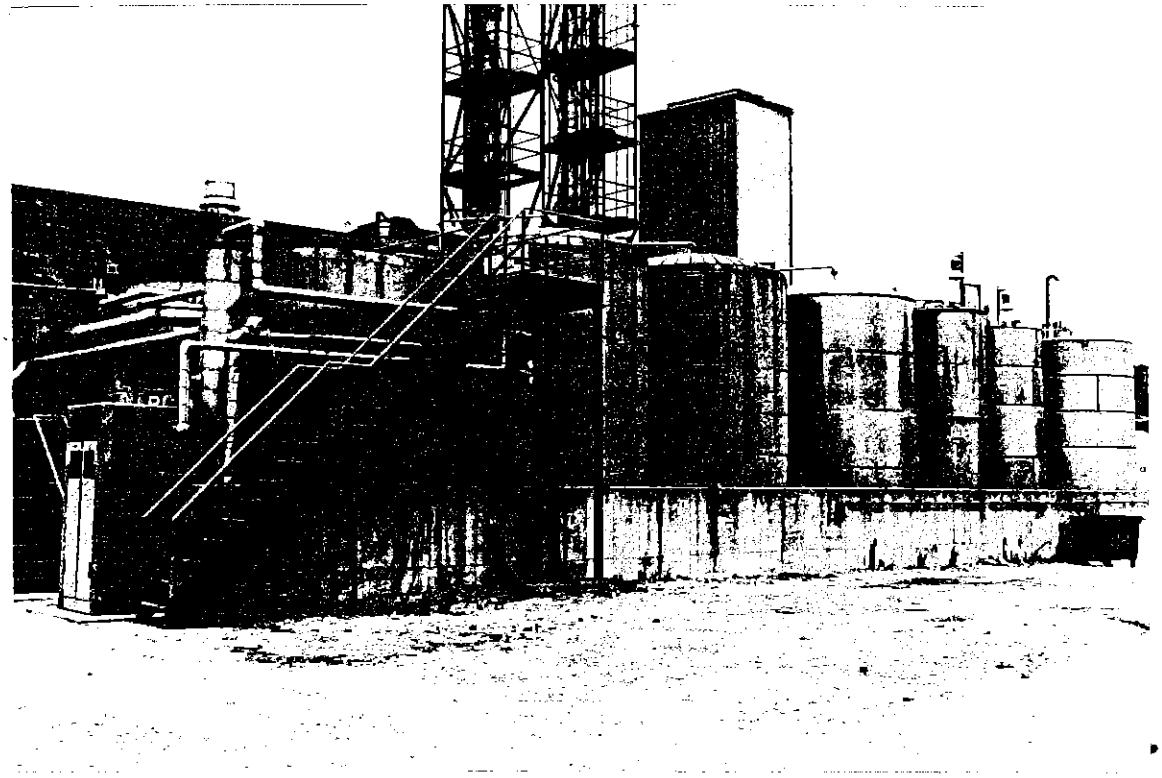
Comments: N DRUM OF HAZARDOUS WASTE FILTERS IN ACCUM. AREA LABELLED NON-HAZARDOUS WASTE

Roll #: 92-21 Photo #: 6

Illinois Environmental Protection Agency Photographs

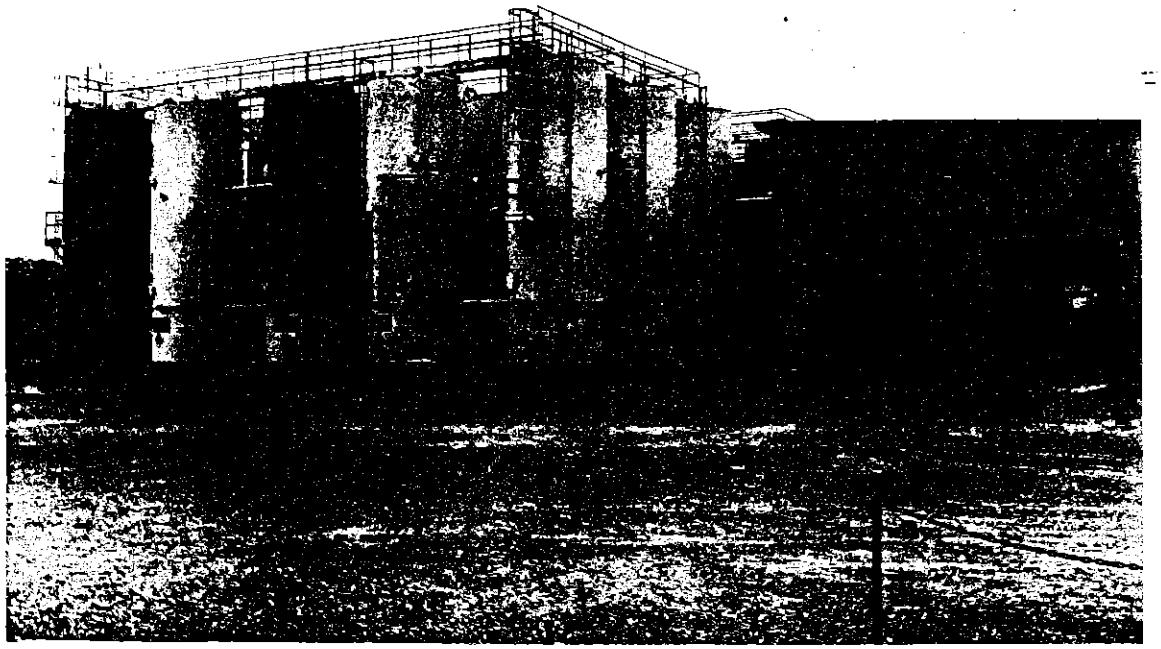
Site Name: _____ IEPA #: _____

_____ Time: _____ Photograph By: _____



Comments: NE TANK FARM 4 - 19 HAZARDOUS WASTE TANKS

Roll #: 92-21 Photo #: 3



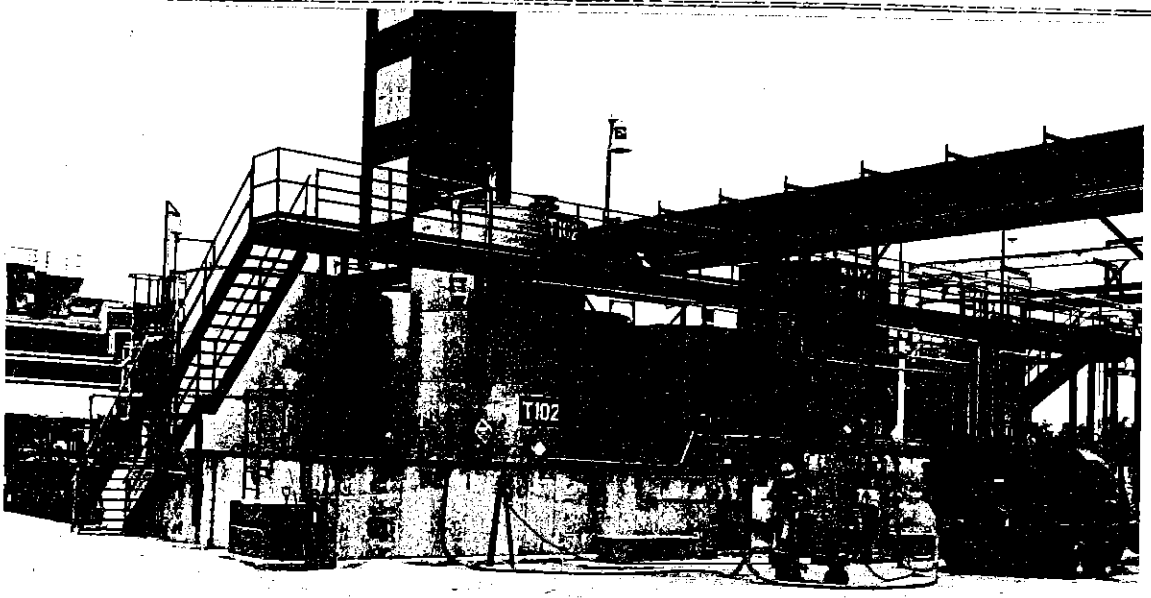
Comments: SE TANK FARM 5

Roll #: 92-21 Photo #: 4

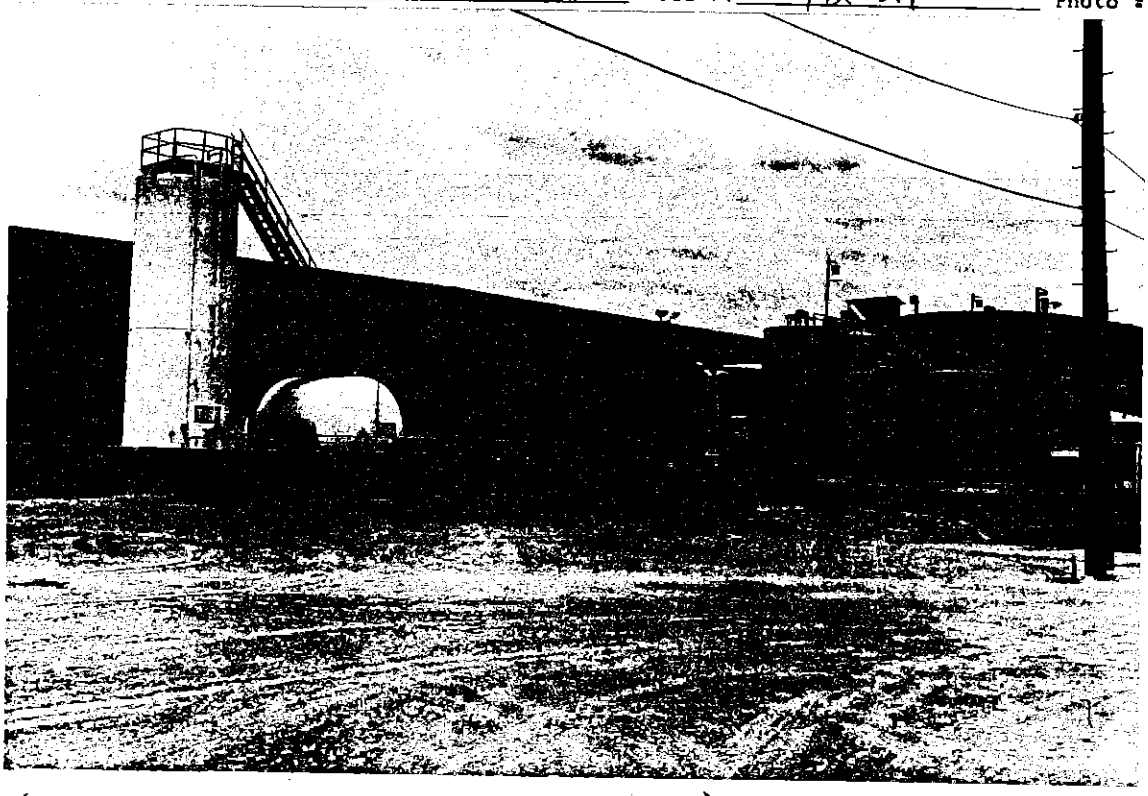
Illinois Environmental Protection Agency Photographs

Site Name: SAFETY-KLEEN CORP - CHICAGO RC IEPA #: 0316000053

Date: 7-24-91 Time: 10AM - 345PM Photographs By: JAMES HAENNICKE



Comments: NW TANK FARM 1 - T102, T103, T104 DESIGNATED HAZARDOUS WASTE TANKS Roll #: 92-21 Photo #: 1



Comments: NW TANK FARMS 2+3 (215 ON RT) - ALL TANKS IN FARM 2 AND BOTH IN FARM 3 DESIGNATED Roll #: 92-21 Photo #: 2

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 ___				

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Area	Class	90 Day F.U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No
				PART 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 ___				

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
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 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) 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 ✓				

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.
				PART 722 **GENERATOR STANDARDS** **Subpart C: Pre-Transport Requirements**				
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?			✓	NONE READY FOR TRANSPORT
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 ____				

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 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.**	✓			
			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
				Condition of Containers (Section 725.271) Has the owner or operator transferred the hazardous waste in leaking container or containers which are not in good condition or managing the waste in some other way that complies with the requirements of this Part? Yes ____ No ____ N/A ____ **Compatibility of Waste with Container (Section 725.272)** Is the owner or operator using containers made of or lined with materials which will not react with and are otherwise compatible with the hazardous waste to be stored so that the ability of the container to contain the waste is not impaired? Yes ____ No ____ **Management of Containers (Section 725.273)** Are containers of hazardous waste always closed during storage? Yes ____ No ____ 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 ____ **Inspections (Section 725.274)** 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 ____ **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.**				

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
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 ✓				* RESOLVED DURING INSPECTION
			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

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 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.
			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 ___				

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 ✓				

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 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.**		✓		REPORT SUBMITTED BUT PARTS WASHERS + IMMERSION CLEANER WASTE NOT INCLUDED
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				

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?			✓	

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**			✓	NONE
				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.**				

IL 532-
LPC 256

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			✓	NONE
			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 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	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).**			✓	

IL 532-
LPC 250

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

TI 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	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 ✓				

L 532-1502

Area	Class	Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comm
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.**			✓	
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 FU Req	Key FU / 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 ___				

TI 537-1507

Area	#	90 Day F U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Cor 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 OF RECYCLABLE MATL'S
				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 ___ NA ✓				

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
				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 ✓				
			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 ____				
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 258 8/87

Area		90 Day U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Com
			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 532-1592
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 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 ___ NA ✓				SK PERFORMS ANAL.

IL 532-159.
LPC 258 8/87

Area	Ch	10 Day F U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Com
				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 ✓				NO SIGNIFICANTLY DIFF. WASTES STORED IN TANKS
				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 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
				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.				

IL 532-1594
LPC 258 8/87

Area		90 Day F U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or C	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 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
				- 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 532-1592
LPC 258 8/87

Area	C	90 ay /U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comm
				- 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 532-1502
LPC 258 8/87

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec.	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No
				B) Key parameters for automatic waste feed cutoff systems? Yes ____ No ____ N/A ✓				NONE
				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 532-159
LPC 258 8/6.

Area	C	90 day U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Com
				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 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	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 ___				

IL 832-1892
LPC 258 8/87

Area		90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Co	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 532-1592
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** **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 532-1582
IPC 258 8/87

Area	C	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Cor
			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
(Rev. 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 ✓				24 HR FACILITY
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 258 6/87

Area	Class	O Y U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comments
				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 ___				CHICAGO POLICE & FIRE
				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 ✓				
				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 ✓				NONE

IL 532-1502
IPR: 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 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 ✓				
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
LPC 258 8/87

Area	Class	Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment
				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 532-1502
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
				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 532-1582
Rev 2/86 8/87

Area	Class	90 Day U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comr
OTH	2			**725.154: Amendment of Contingency Plan**	✓			
				Has the contingency plan been reviewed and, if necessary, amended whenever:				
			a	1) Applicable regulations are revised? Yes ✓ No ___				
			b	2) The plan fails in an emergency? Yes ___ No ___ N/A ✓				
			c	3) The facility changes - in its design, construction, operation, maintenance or other circumstances - in a way that materially increases the potential for fires, explosions, or releases of hazardous waste or hazardous waste constituents or changes the response necessary in an emergency? Yes ✓ No ___ N/A ___				
			d	4) The list of emergency coordinators changes? Yes ✓ No ___				
			e	5) The list of emergency equipment changes? Yes ✓ No ___				
OTH	2			**Section 725.155: Emergency Coordinator**				
				Is there an emergency coordinator on-site or on-call at all times? 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
				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 ✓				NONE SINCE LAST INSPECTION
				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 532-189
LPC 254 8/6

Area	Checks	90 Day U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comments
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 258 8/87

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

IL 532-1507
IPC 250 8/87

Area	Class	90 Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comm.
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 ✓				

IL 532-1582
LPC 256 0707

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 Improvements)? Yes ___ No ___ N/A ___ - 725.352 (Waste Piles)? Yes ___ No ___ N/A ___ - 725.373 (Land Treatment)? Yes ___ No ___ N/A ___ - 725.441 (Incinerators)? Yes ___ No ___ N/A ___ - 725.475 (Thermal Treatment)? Yes ___ No ___ N/A ___ - 725.502 (Chem., Phys., Bio. Treatment)? Yes ___ No ___ N/A ___				NO SIGNIFICANT TYPE OF WASTES STORED IN TANKS
				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

IL 532-1597
LPC 258 8/87

Area	Class	90 Day U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Com
				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.				

IL 532-1592
LPC 258 8/87

Area	Class	90 Day F U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No
				11) All closure cost estimates required by Section 725.242? Yes ✓ No ___ N/A ___				
				12) All post-closure cost estimates for disposal facilities required for Section 725.244? Yes ___ No ___ N/A ✓				
OTH	2			**Section 725.174: Availability, Retention and Disposition of Records**	✓			
			a	During the inspection, were all records including plans required under this Part furnished upon request and made available at all reasonable times for inspection as required by this Section? Yes ✓ No ___ N/A ___				
			c	Upon closure of a waste disposal facility did the owner or operator submit a copy of the record of waste disposal location(s) and quantities to:				
				- The Agency? Yes ___ No ___ NA ✓				
				- 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

IL 532-1882
LPC 256 8/87

Area	Class	90 Y I 90	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comm
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 ____ **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 ____	✓			ALL MANIFESTED

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
				Did the owner or operator submit the unmanifested waste report to the Agency within 15 days of receiving the waste? Yes ____ No ____			✓	
OTH	2			**Section 725.177: Additional Reports**				
				Has the owner or operator submitted to the Agency, as required, reports concerning:				NONE REQUIRED
			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 532-1597
SC 288 8/87

Area	Class	90	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicab	Remarks or Commer
				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 ___				W/ PART B
				- 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 532-1582
IPC 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
				- 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**			✓	
			a	Was the most current facility post-closure plan available during the inspection? Yes ____ No ____				
				Was the post-closure plan submitted to the Agency within the time frames established in this sub-section? Yes ____ No ____ N/A ____				
FIN	1			**Section 725.242: Cost Estimate for Closure**	✓			
				Has the facility prepared a written estimate of the cost of closing the facility?				
FIN	1			**Section 725.244: Cost Estimate for Post-Closure Care**			✓	
				Has the facility prepared a written estimate of the annual cost of post-closure monitoring and maintenance of the facility?				
				NOTE: If no post-closure plan, mark "N/A".				

IL 532-1582
(PC 758 6/87

Area	Class	90 Day Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comm
				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 532-1582
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
				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?			✓	NONE

IL 532-1502
LPC 258 6/87

Area	C	90 Day U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Com
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 ___ NA ✓ **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 - LOCATED ABOVE GROUND OUTSIDE

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
			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 532-1582
LPC 258 8/87

Area	Cl...	...0 ...ay ...P/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Com
			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 ✓				
			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 ✓ <u>or</u> 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 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
			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.**				VAULT
			f	Is ancillary equipment protected by secondary containment that meets the requirement of Subsections (h) and (c) except for:				

1. 832-1592

Area	C	90 ay r/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Con
				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 ✓				
				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 532-1502

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 725.294: 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 ✓				
			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 ✓				
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, 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).				

H. 532-1592

Area	Class	CFR Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comm.
				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
(OP 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
			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.**	✓			
			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 ___				CURRENTLY CLOSING AREA WHERE TANKS 190-193 ONCE WERE. FARM 3 TANKS WERE DECONTAMINATED AND SCRAPPED. WAITING FOR CERT. BY ENGINEERS
			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.**				✓

532-1507

Area	Class	90 Day U req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comm
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**			✓	NONE
				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 532-1592

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 725.300: Waste Analysis and Trial Tests**			✓	
				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 ✓				NOT SUBSTANTIALLY DIFF.
				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.				

532-1582

Illinois Environmental Protection Agency
Division of Land Pollution Control

RCRA INSPECTION REPORT

USEPA #: IL D005450697 | IEPA #: 0316000053

Facility Name: Safety-Kleen Corp. Chgo RC | Phone #: 312/650-1467

Street Address: 1445 W. 42nd Street | County: Cook

City: Chicago | State: IL | Zip: 60609

Region: 2 | Inspection Date: 1/30/91 | From: 9:30Am To: 12:30pm

Weather: 40°

TYPE OF FACILITY

Notified As: G, Tr, TSD, WAF, OSF | Regulated As: G, S

LDF? No HPV? No | 90-Day F/U Required?: YES ____ NO X

TYPE OF INSPECTION

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

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

NON-REGULATED STATUS

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

PART A

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

Initial Part A Date: 11/19/80 | Amended: 11/9/88

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

Has the firm been referred to -- USEPA: Y or (N) __/__/__

Illinois Attorney General: Y or (N) __/__/__ County State's Attorney: Y or (N) __/__/__

ORDERS ISSUED

CACO: __/__/__ CAFO: __/__/__ Consent Decree: __/__/__

Federal Court Order: __/__/__ State Court Order: __/__/__ IPCB Order: __/__/__

TSD FACILITY ACTIVITY SUMMARY

Activity by Process Code	On Part A?	Activity Conducted Prior to 1980?	Was Activity Ever Done?	Closed	Being done at Time of Insp.?	Exempt per 35 IAC, Sec.	On Annual Report 1987	1988	1989
S01	Yes	Yes	Yes	No	Yes	N/A	Yes	No	Yes
S02	Yes	Yes	Yes	No	Yes	N/A	No	No	Yes
R03	N/A	Yes	Yes	N/A	Yes	725.101(c)(6)	No	Yes	Yes

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SUMMARY OF APPARENT VIOLATIONS

OWNER		OPERATOR	
Name	Safety-Kleen Corp	Name	Safety-Kleen Corp.
Address	777 Big Timber Rd	Address	1445 W. 42nd St.
City	Elgin	City	Chicago
State	IL Zip 60123	State	IL Zip 60609
Phone #	708/697-8460	Phone #	312/650-1467

PERSON(S) INTERVIEWED	TITLE	PHONE #
Alfred Aghaiepour	Facility Manager	312/650-1466
Ted Zajack	Operations Manager	312/247-2322

INSPECTION PARTICIPANT(S)	AGENCY/TITLE	PHONE #
John Maher	IEPA/EPS	708/531-5900

PREPARED BY	AGENCY/TITLE	PHONE #
John Maher	IEPA/EPS	708/531-5900

Area	Class	Section

Area	Class	Section

Area	Class	Section

Facility Name: Safety-Kleen Corp.
USEPA #: IL D005450687
IEPA #: 031600053

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) * 1989	* 1988	* 1987	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	~12,000 gal	20,000 to 30,000 gal per month	1-24-91	Safety-Kleen in Clarksville, MO for Blending/Reclamation
Miscellaneous Drummed waste	- Cleaning out tanks - Tank bottoms - Used oil filter - Drippings from hoses - "Cutter Drums"		F001 F002			G F	G F	G F	115 drums	100-200 drums per year	10-24-90	Safety-Kleen in Dolton, IL for fuel blending; or Deerpark, TX for incineration.
Remanifested Waste	- Temporary storage - Shipped for further reclamation - waste sent in error		F001 F002 D001			G F	G F	G F	None	50,000 gal per year	1-22-91	Safety-Kleen in Dolton, IL or Hebron, OH
Waste Filters	Used filter waste as it is pumped into tanks		F001 F002 F003 F005			G F	G F	G F	21 drums	150-200 drums per year	10-24-90	Rollis in Deerpark, TX for incineration or Safety-Kleen in Hebron, OH (Typically in 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				

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

IL 532-1836

NARRATIVE

Safety-Kleen Corp. Chicago Recycle Center has changed very little since the last inspection six months ago. Therefore, the following is a reiteration of the previous RCRA inspection report.

Safety-Kleen Corp. 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 constitues approximately 80-85 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 to 30,000 gallons are generated per month.
   - shipped to Safety-Kleen in Clarksville, MO for fuel blending or further reclamation. (This used to also go to Saftety-Kleen in Dolton, IL).
   - 1 to 2 shipments are made every week.
   - 12,000 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) tank bottoms
     d) used oil dry.

e) "cutters" - drums which must be cut open in order to remove solid material contained inside.

- approximately 100 to 200 drums are generated per year.
- shipped to Safety-Kleen in Dolton, IL for fuel blending or to Rollins in Deerpark, TX for incineration.
- Shipments are made approximately three times per year.
- Approximately 115 drums 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 50,000 gallons are generated per year.
   - shipped to Safety-Kleen in Dolton, IL or Safety-Kleen in Hebron, OH for reclamation.
   - approximately five shipments are made each year.
   - Currently none on site.

4. Waste Filters (F001, F002, F003, F005)
   - used to filter waste as it is pumped into tanks.
   - 150 to 200 drums generated per year.
   - Typically sent to Safety-Kleen in Hebron, OH, but can be sent to Rollins in Deerpark, TX.
   - three shipments made per year.
   - 21 drums currently on site.

<u>Hazardous Waste Units</u>

1. Truck Stations #1, #2 and #3
   - used for loading and unloading of waste materials
   - Truck Station #1 is used for tankers; Truck Stations #2 and #3 are used for truck trailers
   - all are fitted with a concrete floor, curbs and walls
   - Truck Station #1 is covered with a roof which prevents stormwater from coming into contact with hazardous wastes or contaminated areas.

2 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

3. S02 - Tank #199
   - located on the north side of Container Storage Area #1
   - 7,600-gallon horizontal carbon steel tank
   - formerly used to store hazardous and non-hazardous wastes
   - currently empty and decontaminated in anticipation of closure, which is expected to occur in less than two weeks.

4. 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 a resistant coating as an addition to the existing secondary containment
   - Closure of tanks T105 - T114 is expected to be completed within the next month.

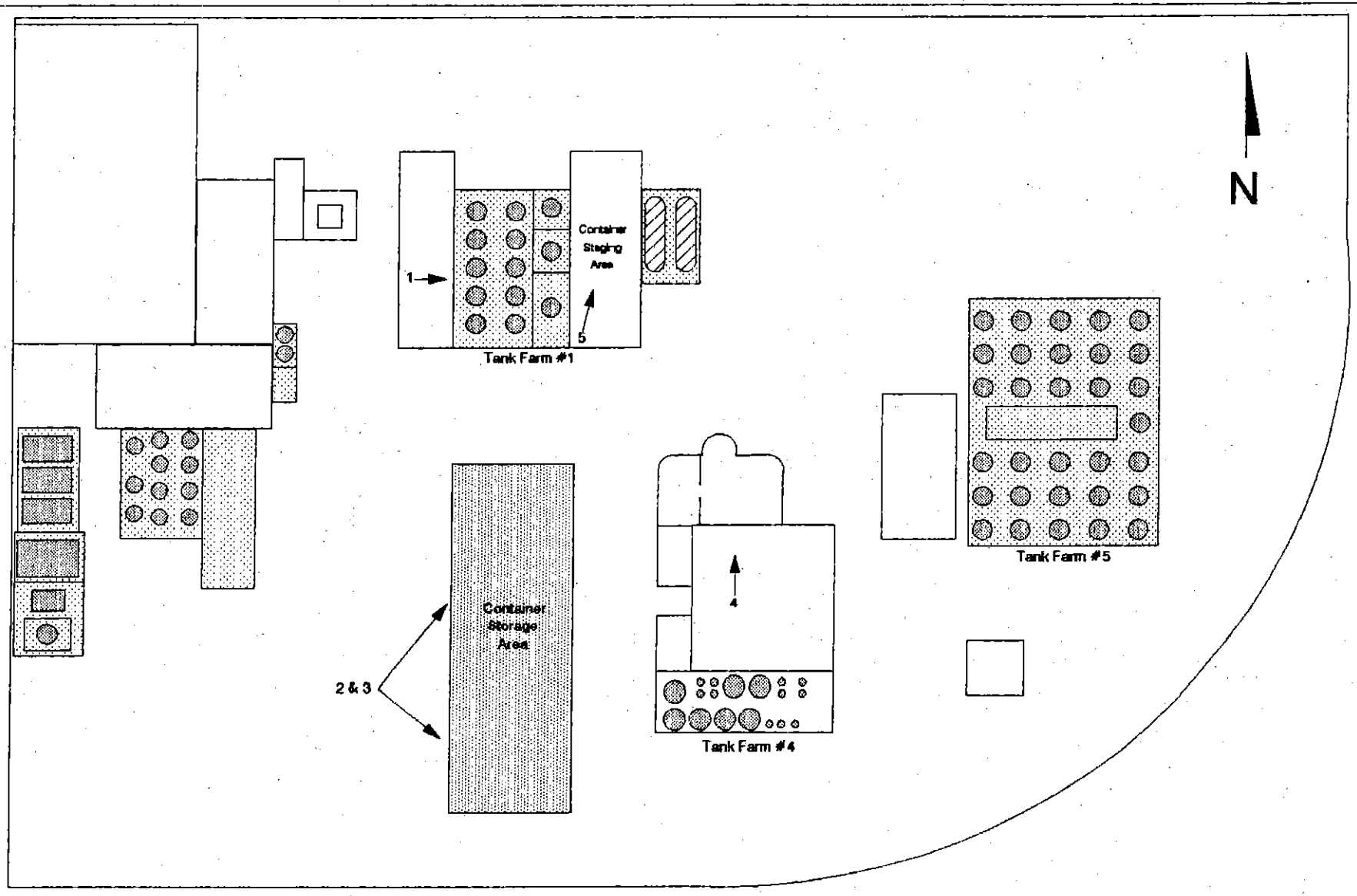
At the time of the inspection, this site was operating in apparent compliance as a generator and a storage facility.

Safety-Kleen Corp. Chicago Recycle Center

0316000053

January 30, 1991

West 42nd Street

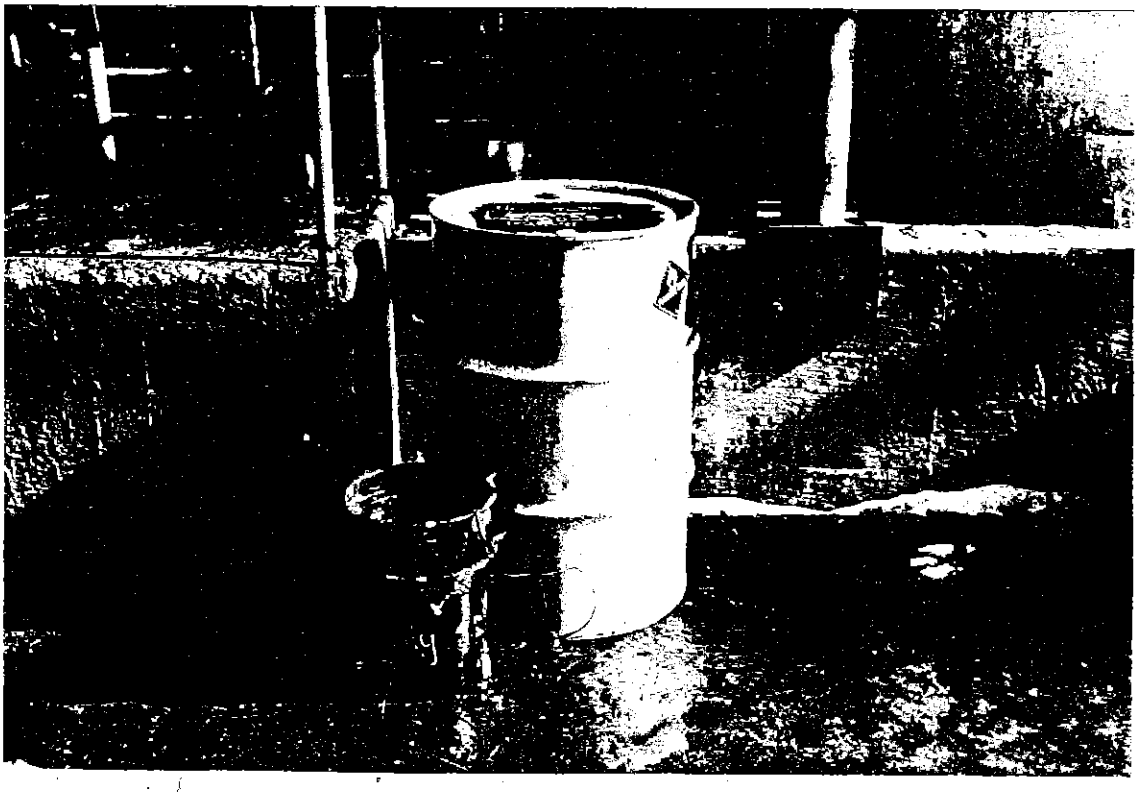


J. Maher

Illinois Environmental Protection Agency Photographs

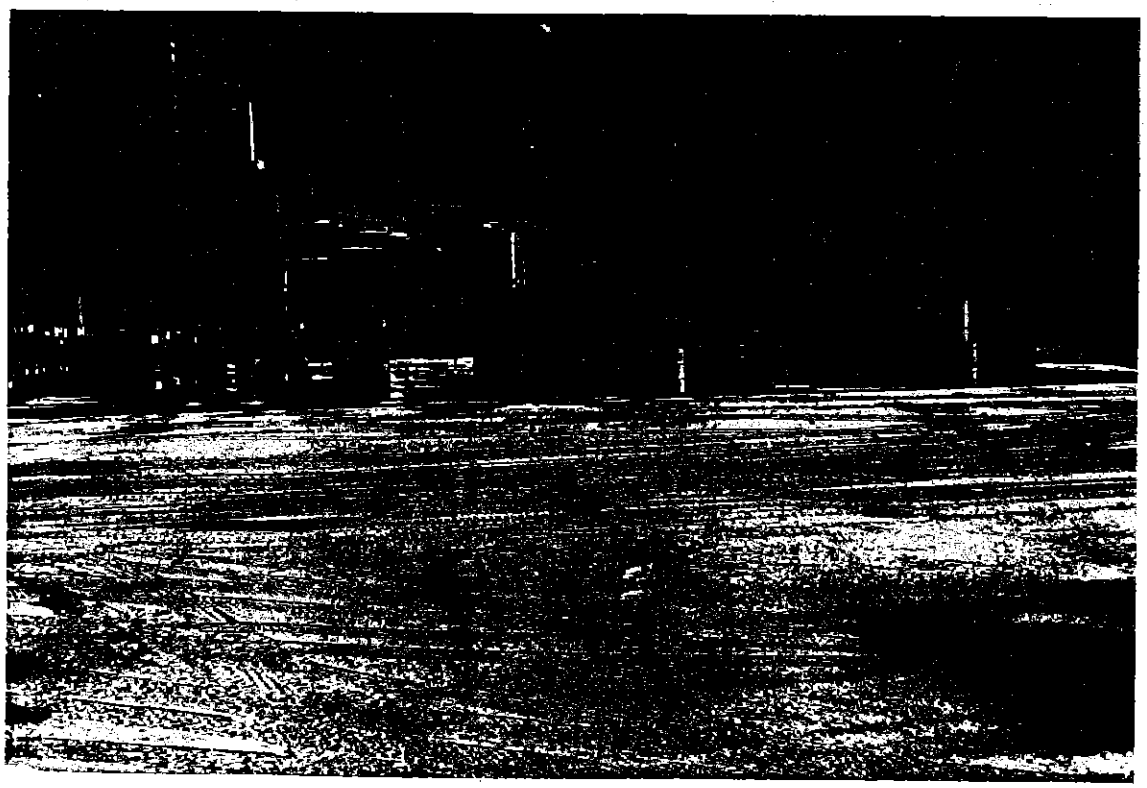
Site Name: Safety - Kleen Corp. - Chgo RC Site #: 0316000053

te: 1-30-91 Time: 9:30Am - 12:30pm Photograph By: John Maher



Comments: Satellite accumulation.

Roll #: 91-212 Photo #: 1



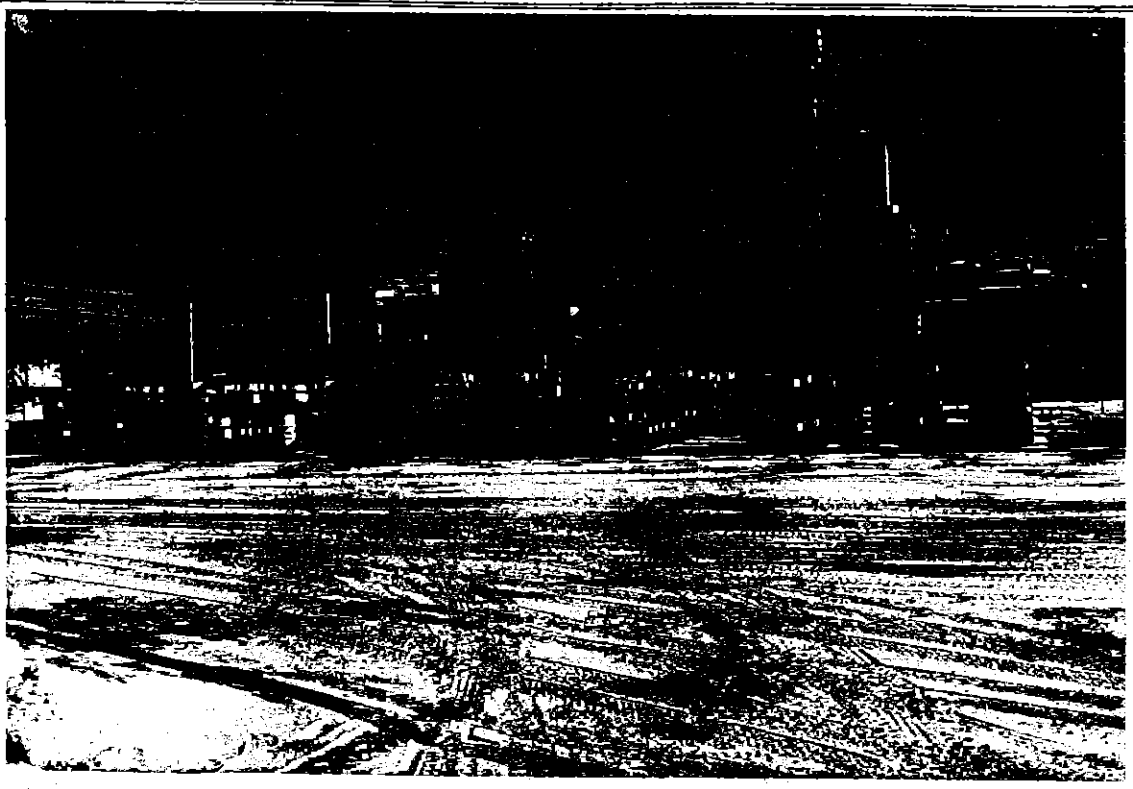
Comments: Container Storage area.

Roll #: 91-212 Photo #: 2

Illinois Environmental Protection Agency Photographs

Site Name: Safety-Kleen Corp. - Chgo. RC Site #: 0316000053

1-30-91 Time: 9:30Am-12:30pm Photograph By: John Maher



Comments: Container storage area.

Roll #: 91-212 Photo #: 3

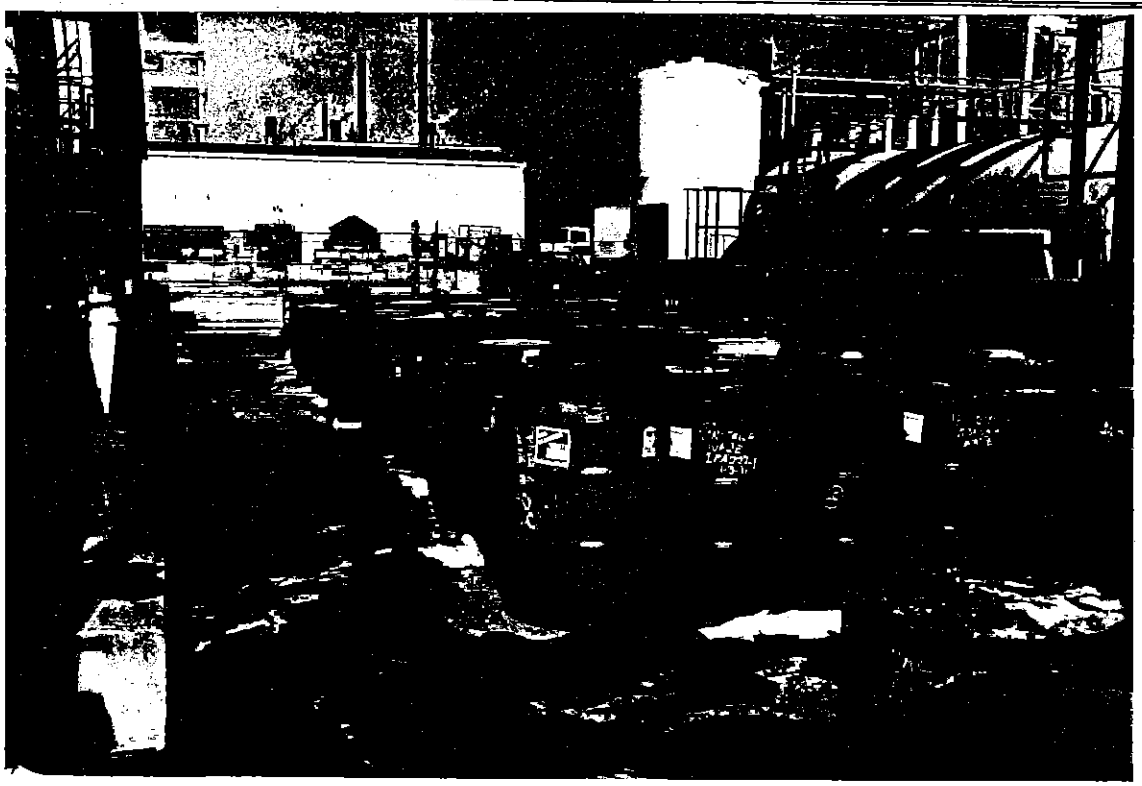
Comments: Satellite accumulation.

91-212 4

Illinois Environmental Protection Agency Photographs

Site Name: Safety-Kleen Corp. - Chgo RC Site #: 0316000053

Date: 1-30-91 Time: 9:30Am-12:30pm Photograph By: John Maher



Comments: Container Staging area

Roll #: 91-212 Photo #: 5

Comments:

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**	X			
				Has the generator determined if the solid waste it generates is a hazardous waste? Yes X No ___				
				Did the generator follow the procedures specified in this section in making its determination? Yes X No ___				
OTH	1			**Section 722.112: USEPA Identification Number**	X			
			a	Has the generator obtained a USEPA identification number? Yes X 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 X No ___				

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Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No
				PART 722 **GENERATOR STANDARDS** **Subpart B: The Manifest**				
MAN	2			**Section 722.120: General Requirements**	X			
			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 X 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 X 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 X No ____				

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.
MAN	2			**Section 722.121: Acquisition of Manifests**	X			
			a	Did the generator use the manifest supplied by the Agency for hazardous waste going for treatment, storage or disposal in Illinois? Yes X 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 X No ____ N/A ____				
MAN	2			**Section 722.122: Number of Copies**	X			
				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**	X			
				For each manifest received, has the generator: 1) Signed the certificate by hand? Yes X No ____ 2) Obtained the handwritten signature and the date of acceptance by the initial transporter? Yes X No ____				

IL 532-1592
IDC: 25M 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 X No ___				
				4) Apparently sent a copy (Part 5 for Illinois manifests) to the Agency within two working days? Yes X 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 X 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 X				
			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 X				

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**				
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?			X	Waste is not ready for transport.
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?			X	
OTH	1	X		**Section 722.132: Marking**			X	
			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 ____				

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 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.**	X			
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.**			X	Site has interim status and all generated waste goes into storage.
			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.
				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 X No ___ N/A ___ - Complying with the requirements of: 1) 35 Ill. Adm. Code 725.271, Condition of Containers? Yes X No ___ 2) 35 Ill. Adm. Code 725.272, Compatibility of Waste with Containers? Yes X 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 X No ___ - Marking the containers with the words "Hazardous Waste" or with words that identify the contents of the containers? Yes X 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 ____ N/A X Are the containers with the excess amounts marked with the date accumulation began? Yes X No ____ During the three day period, is the generator continuing to comply with the requirements of Section 722.134(c)(1)? Yes X No ____				Within 3 days the waste goes to the storage area.

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:	X			
			a	- A copy of each signed manifest? Yes X No ___				
			b	- A copy of each annual report? Yes X No ___				
			b	- A copy of each exception report? Yes ___ No ___ N/A X				
			c	- Copies of test results, waste analyses or other determinations made in accordance with Section 722.111? Yes X 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 X				
			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 X				

IL 532-1592
LPC 258 8/87

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
OTH	2			**Section 722.141: Annual Reporting**	X			
				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**			X	
			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 532-1582
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.
				- 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?			X	

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	1/2			**PART 722** **GENERATOR STANDARDS** **Subpart E: Exports of Hazardous Waste**			X	
				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.**				

IL 532-1502
LPC 256 8/87

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
MAN	1			**PART 722** **GENERATOR STANDARDS** **Subpart F: Imports of Hazardous Waste** **Section 722.160: Imports of Hazardous Waste**			X	
			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 532-1502
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	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).**			X	

IL 532-1582
LPC 26a 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 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**	X			
			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 X 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 X 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 X				

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**			X	
				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**	X			
				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 X No ____ N/A ____ 2) As necessary to comply with the provisions of Section 703.155, Changes During Interim Status? Yes X 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	No	Not Applicable	Remarks or Comment No.
OTH	1			**Section 703.154: Prohibitions During Interim Status**	X			
				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 X No ___				
			b	- Employing processes not specified in Part A of the permit application? Yes X No ___				
			c	- Exceeding the design capacities specified in Part A of the permit application? Yes X No ___				
OTH	1			**Section 703.155: Changes During Interim Status**	X			
				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 X				

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**	X			
				Does the facility qualify for any of the exemptions under Section 725.101(c)? Yes X 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 X				

IL 532-1592
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.
				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?	X			
OTH	1			**Section 725.112: Required Notices**			X	
			a	Has the owner or operator of a facility that has arranged to receive hazardous waste from a foreign source notified the Regional Administrator, in writing, at least four weeks in advance of the date that the waste is expected to arrive at the facility? Yes ____ No ____ N/A X				
			b	Before transferring ownership or operation of a facility during its operating life, or of a disposal facility during the post-closure care period, did the owner or operator notify the new owner or operator, in writing, of the requirements of 35 Ill. Adm. Code 703, 703 and 725? Yes ____ No ____ N/A X				
OTH	1			**Section 725.113: General Waste Analysis**	X			
			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 X 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.
			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 X 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 X 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 X 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 X No ___ N/A ___				
			b	Has the owner or operator developed a written analysis plan? Yes X No ___ **NOTE: If "No", skip to 725.114.** Is the written waste analysis plan available at the facility? Yes X No ___				

U 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.
				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 X 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 X No ___				
				2) The test methods which will be used to test for those parameters? Yes X No ___				
				3) The sampling method which will be used to obtain a representative sample of the waste to be analyzed? Yes X 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 X No ___				
				5) For off-site facilities, the waste analyses that hazardous waste generators have agreed to supply? Yes X No ___				However, the site analyzes all wastes.

IL 532-1592
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
				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 X 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 X 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 X No ___ N/A ___				
OTH	1	X		**Section 725.114: Security**	X			
				Does the facility qualify for the exemption to the requirement to provide security provided in Section 725.114(a)? Yes ___ No X				

II 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.
				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 X				
				OR				
			b	2) An artificial or natural barrier which completely surrounds the active portion of the facility and a means to control entry at all times thru the gate(s) or other entries to the active portion of the facility? Yes X No ____				
			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 X 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 532-0592

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**	X			
			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 X 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 X 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 X No ___				
			b2	Is the written schedule at the facility? Yes X No ___				
			b3	Does the schedule identify the types of problems which are to be looked for during the inspection? Yes X No ___				
			b4	Does the schedule specify at least the following minimum inspection frequency: - Daily inspections of areas subject to spills? Yes X 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.
				- 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 X 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 X 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 X				
			d	Does the owner or operator record the results of inspections in a log or summary? Yes X No ___				
			d	Does the inspection record include: - The date and time of the inspection? Yes X No ___ - The name of the inspector? Yes X No ___				

TL 532-1592

Area	Class	30 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 X No ___				
				- The date and nature of any type of corrective action? Yes X No ___ N/A ___				
OTH	2			**Section 725.116: Personnel Training**	X			
				Does the facility have a training program? Yes X 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 X No ___				
				Is the training program formalized, i.e., written down? Yes X No ___				
			a2	Is the program directed by a person who has been trained in hazardous waste management procedures? Yes X No ___				
			a3	Does the program cover, at a minimum:				
				A) Procedures for using, inspecting, repairing and replacing facility emergency and monitoring equipment? Yes X No ___ N/A ___				

IL 532-1502
LPC 256 8/87

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
				B) Key parameters for automatic waste feed cutoff systems? Yes ____ No ____ N/A X				
				C) Communications or alarm systems? Yes X No ____ N/A ____				
				D) Response to fire or explosion? Yes X No ____ N/A ____				
				E) Response to ground water contamination incidents? Yes ____ No ____ N/A X				
				Does the program cover the implementation of the contingency plan? Yes X 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 X No ____ N/A ____				
			c	Has the facility conducted an annual review of the initial training? Yes X 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 X No ____				

IL 532-1592
(PC 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 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 X 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 X 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 X 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 X No ____ N/A ____				
OTH	1	X		**Section 725.117: General Requirements for Ignitable, Reactive or Incompatible Wastes**	X			
			a	Are ignitable and reactive wastes protected from and separated from sources of ignition and reaction? Yes X No ____				
			a	Are smoking and open flames restricted to specially designated areas when ignitable or reactive waste is being handled? Yes X 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 X 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 X No ___ 2) Produce uncontrolled toxic mists, fumes, dusts or gases in sufficient quantities to threaten human health? Yes X No ___ 3) Produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosion? Yes X No ___ 4) Damage the structural integrity of the device or facility containing the waste? Yes X No ___ 5) Through other like means threaten human health or the environment? Yes X No ___				

IL 532-1592
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.
				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 X **NOTE: A "Yes" answer is a violation of the location standard.**			X	

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 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 X No ___	X			
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:	X			
			a	- An internal communications or alarm system capable of providing immediate emergency instructions? Yes X 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 X 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
			c	- Portable fire extinguishers, fire control equipment, spill control equipment and decontamination equipment? Yes X 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 X 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 X No ____ N/A ____ - Fire protection equipment? Yes X No ____ N/A ____ - Spill control equipment? Yes X No ____ N/A ____ - Decontamination equipment? Yes X No ____ N/A ____ **NOTE: Any "N/A" answer must be explained in the Comments.**	X			

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**	X			
			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 X 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 X				
OTH	1	X		**Section 725.135: Required Aisle Space**	X			
				Is the owner or operator maintaining sufficient aisle space to allow the unobstructed movement of personnel, fire equipment and decontamination equipment to any area of the facility?				
OTH	2			**Section 725.137: Arrangements with Local Authorities**	X			
			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 532-1592

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 X 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 X				Chicago will respond.
				3) Agreements with State emergency response teams, emergency response contractors and equipment suppliers? Yes X 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 X 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 X				

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**	X			
			a	Is a plan available? Yes X 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 X 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 X				
OTH	2			**Section 725.152: Content of Contingency Plan**	X			
			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 X No ___ 2) Explosions? Yes X 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 X No ___				
			c	Does the plan describe the arrangements agreed to by:				
				1) Local police and fire departments? Yes X No ___				
				2) Hospitals? Yes X No ___				
				3) Contractors? Yes X No ___				
				4) State and local emergency response teams? Yes X 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 X No ___				
			d	Is the list of emergency coordinators up-to-date? Yes X No ___				
			d	If more than one person is designated as an emergency coordinator is a primary coordinator designated? Yes X No ___				
			e	Does the plan identify:				
				1) A list and physical description of all emergency equipment at the facility? Yes X No ___				

IL 532-1592
IPC 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.
				2) A brief outline of the capability of each piece of emergency equipment? Yes X No ___				
				3) The location of each piece of emergency equipment? Yes X No ___				
			e	Is the list of emergency equipment up-to-date? Yes X No ___				
			f	Does the plan include an evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? Yes X No ___ N/A ___				
			f	Does the plan identify the signal to be used to begin evacuation? Yes X No ___				
			f	Are alternate evacuation routes identified? Yes X No ___				
OTH	2			**Section 725.153: Copies of Contingency Plan**	X			
			a	Has a copy (and all revisions) of the contingency plan:				
				a) Been maintained at the facility? Yes X 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 X No ___				

U 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	2			**725.154: Amendment of Contingency Plan**	X			
				Has the contingency plan been reviewed and, if necessary, amended whenever:				
			a	1) Applicable regulations are revised? Yes ____ No ____ N/A X				
			b	2) The plan fails in an emergency? Yes ____ No ____ N/A X				
			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 X No ____ N/A ____				
			d	4) The list of emergency coordinators changes? Yes X No ____				
			e	5) The list of emergency equipment changes? Yes X No ____				
OTH	2			**Section 725.155: Emergency Coordinator**	X			
				Is there an emergency coordinator on-site or on-call at all times? Yes X 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	1/2			Is there an emergency coordinator familiar with all aspects of the contingency plan, all operations and activities at the facility, the location and characteristics of the wastes handled, the location of all records in the facility and the facility layout? Yes X No ___ Does the coordinator have the authority to commit the resources to carry out the contingency plan? Yes X No ___ **Section 725.156: Emergency Procedures** Has the facility had a release, fire or explosion? Yes ___ No X **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.**			X	

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.
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 X 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:	X			
			a1	1) Sign and date each copy to certify that the hazardous waste covered by the manifest was received? Yes X No ___				
			a2	2) Note any significant discrepancies in the manifest or each copy of the manifest? Yes X No ___ N/A ___				
			a3	3) Immediately give one copy of the completed manifest to the transporter? Yes X No ___				
			a4	4) Within 30 days after delivery, send one copy of the manifest to the generator and one copy to the Agency? Yes X 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 X No ___				

IL 532-1592
IPC: 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	Has the facility followed the procedures prescribed in 725.171(b) for rail or water (bulk shipments) of hazardous waste? Yes ____ No ____ N/A X Does the facility initiate shipments of hazardous waste? Yes X 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.**	X			
			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 X 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 X 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.
OTH	2			**Section 725.173: Operating Record**	X			
			a	Does the owner or operator have a written operating record at the facility? Yes X No ____				
			b	Is the information in the operating record being maintained until closure of the facility? Yes X 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 X No ____ 2) A record of the method(s) and date(s) of its treatment, storage, or disposal as required by Appendix I? Yes X No ____ 3) The location of each hazardous waste within the facility? Yes X No ____ 4) The quantity of each hazardous waste at each location within the facility? Yes X 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 X				

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.
				6) A cross reference by manifest number to location and quantity of hazardous waste? Yes X No ____ N/A ____				
				7) Records and results of waste analyses and trial test performed as specified in Sections: - 725.113 (Gen. Waste Analysis)? Yes X No ____ - 725.293 (Tanks)? Yes X No ____ N/A ____ - 725.325 (Surface Improvements)? Yes ____ No ____ N/A X - 725.352 (Waste Piles)? Yes ____ No ____ N/A X - 725.373 (Land Treatment)? Yes ____ No ____ N/A X - 725.441 (Incinerators)? Yes ____ No ____ N/A X - 725.475 (Thermal Treatment)? Yes ____ No ____ N/A X - 725.502 (Chem., Phys., Bio. Treatment)? Yes ____ No ____ N/A X				
				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 X				

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
				9) Records and results of inspections as required by Section 725.115(d)? Yes X 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 X - 725.194 (G.W. Monitoring)? Yes ____ No ____ N/A X - 725.376 (Land Treatment)? Yes ____ No ____ N/A X - 725.378 (Land Treatment)? Yes ____ No ____ N/A X - 735.380(d)(1) (Land Treatment)? Yes ____ No ____ N/A X - 725.447 (Incinerators)? Yes ____ No ____ N/A X - 725.477 (Thermal Treatment)? Yes ____ No ____ N/A X **NOTE: Data required under 725.194 must be kept throughout the post-closure period.**				

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.
				11) All closure cost estimates required by Section 725.242? Yes X No ____ N/A ____				
				12) All post-closure cost estimates for disposal facilities required for Section 725.244? Yes ____ No ____ N/A X				
OTH	2			**Section 725.174: Availability, Retention and Disposition of Records**	X			
			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 X 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: N/A X				
				- The Agency? Yes ____ No ____				
				- The local land authority? Yes ____ No ____ N/A ____				
			b	Are all required records being maintained and retained during the course of any unresolved enforcement action or as requested by the Director? Yes ____ No ____ N/A X				

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?	X			
OTH	1			**Section 725.176: Unmanifested Waste Report** Does the facility accept hazardous waste from off-site? Yes X No ____ **NOTE: If the answer is "Yes", complete this section. If the answer is "No", check "N/A" 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 X 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 X **NOTE: If the answer to both the above questions is "Yes", check "N/A". If the answer to the first question is "Yes" and the second "No", answer the following questions:** Did the owner or operator complete an unmanifested waste report to include the information required in Section 725.176(a) thru (g)? Yes ____ No ____ N/A X	X			

IL 532-0502
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.
				Did the owner or operator submit the unmanifested waste report to the Agency within 15 days of receiving the waste? Yes ____ No ____ N/A X				
OTH	2			**Section 725.177: Additional Reports**	X			
				Has the owner or operator submitted to the Agency, as required, reports concerning:				
			a	1) Releases, fires, explosions as specified in Section 725.156? Yes ____ No ____ N/A X				
			b	2) Groundwater contamination and monitoring data as specified in Sections 725.193 and 725.194? Yes ____ No ____ N/A X				
			c	3) Facility closure as specified in Section 725.215? Yes X 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.
				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**	X			
			a	Was the most current facility closure plan available during the inspection? Yes X 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 X				
				- 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 X				
				- 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 X				
				- 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 X				

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.
				- No later than 15 days after termination of interim status (unless a full operating permit was issued simultaneously)? Yes ____ No ____ N/A X				
				- 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 X				
CLO	1			**Section 725.218: Post-Closure Plan**			X	
			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**	X			
				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**			X	
				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

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**	X			
				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**	X			
				Is the owner or operator using containers made of or lined with materials which will not react with and are otherwise compatible with the hazardous waste to be stored so that the ability of the container to contain the waste is not impaired?				
OTH	1	X		**Section 725.273: Management of Containers**	X			
			a	Are containers of hazardous waste always closed during storage? Yes X 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 X No ___				
OTH	2			**Section 725.274: Inspections**	X			
				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 X No ___				

IL 632-1592
LBC 25M 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?	X			
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?			X	

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.
				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 X 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 ____ N/A X **NOTE: Failing the filter test means that the waste contains free liquids.**				
OTH	2			**Section 725.291: Assessment of Existing Tank Systems**	X			
			a	For tanks not protected by a secondary containment system, is an independent, certified written assessment available? Yes X No ____ **NOTE: Except as provided in Subsection (c) of 725.291, certified assessment must be available by 1/12/88.**				

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 X 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 X 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 X 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.
			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 X No ___				
OTH				**Section 725.293: Containment and Detection of Releases**	X			
			aI	Is secondary containment provided for any new tank system (constructed after 7/14/86) before being put into service? Yes X 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 X				
			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 X No ___ N/A ___				
			a4	For an existing tank of unknown age, has secondary containment been provided by January 12, 1995? Yes ___ No ___ N/A X **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 X				
			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 X				

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.
			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 X 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 X 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 X 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 532-1592

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 X 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 X				
				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 X				
				3) Are written records maintained at the facility to document the assessments required under Subsections (i)(1) and (2)? Yes ___ No ___ N/A X				

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	X		**Section 725.294: General Operating Requirements**	X			
			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 X 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 X				
			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 X				
OTH	2			**Section 725.295: Inspections**	X			
			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 X No ___				
OTH	1	X		**Section 725.296: Response to Leaks or Spills and Disposition of Tank Systems**			X	
				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 X				
				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 532-1592

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:				N/A
			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 532-1502

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**			X	(partial) Closure is not complete yet.
				NOTE: The requirements of this section apply to closure of tank systems. If no closure is being performed, then skip to Section 725.298.				
			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 ____				
			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 532-1502

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 725.298: Special Requirements for Ignitable or Reactive Wastes**	X			
				Are ignitable or reactive wastes stored in tanks? Yes X 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 X 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 X No ___				
OTH	1			**Section 725.299: Special Requirements for Incompatible Wastes**			X	
				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 532-1592

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 725.300: Waste Analysis and Trial Tests**			X	No significantly different wastes 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
LPC 258 8/87

RCRA LAND DISPOSAL RESTRICTION INSPECTION

Facility: Safety-Kleen Corp. Chgo RC

U.S. EPA I.D. No. : ILD 005450697 031600053

Street: 1445 West 42nd St

City: Chicago State: IL Zip: 60609

Telephone: 312/650-1467

Owner/Operator: Safety-Kleen Corp.

Street: 777 Big Timber Rd.

City: Elgin State: IL Zip: 60123

Telephone: 708/697-8460

Inspection Date: 1/30/91 Time: 9:30am - 12:30pm

Weather Conditions: 40°

	Name	Agency/Title	Telephone
Inspectors:	John Maher	IEPA/EPS	708/531-5900
Facility Representative:	Alfred Aghaiepour	Facility Mgr.	312/650-1467
	Ted Zajack	Operation Mgr.	312/650-1467

	Generate	Transport	Treat	Store	Dispose
F-Solvent	✓		✓	✓	
Dioxin					
California List	✓		✓	✓	
First Third					
Second Third					

Revised 10-20-89

RECEIVED
19 MAR 1991
IEPA/DLPC

RECEIVED
NOV 22 1989
IEPA/DLPC

FOR FACILITY BACKGROUND, SEE RCRA NARRATIVE

Processes That Generate LDR Wastes

DISTILLATION UNIT

FRACTIONATION UNITS

LIQUID-LIQUID EXTRACTION UNITS

WASTE WATER TREATMENT UNIT

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.

Summary

THE FACILITY APPEARED TO BE OPERATING IN COMPLIANCE WITH LAND DISPOSAL RESTRICTION REGULATIONS.

NARRATIVE

Safety-Kleen Corp. Chicago Recycle Center has changed very little since the last inspection six months ago. Therefore, the following is a reiteration of the previous RCRA inspection report.

Safety-Kleen Corp. 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 constitues approximately 80-85 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 to 30,000 gallons are generated per month.
   - shipped to Safety-Kleen in Clarksville, MO for fuel blending or further reclamation. (This used to also go to Saftety-Kleen in Dolton, IL).
   - 1 to 2 shipments are made every week.
   - 12,000 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) tank bottoms
     d) used oil dry.

3. S02 - Tank #199
   - located on the north side of Container Storage Area #1
   - 7,600-gallon horizontal carbon steel tank
   - formerly used to store hazardous and non-hazardous wastes
   - currently empty and decontaminated in anticipation of closure, which is expected to occur in less than two weeks.

4. 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 a resistant coating as an addition to the existing secondary containment
   - Closure of tanks T105 - T114 is expected to be completed within the next month.

At the time of the inspection, this site was operating in apparent compliance as a generator and a storage facility.

RCRA LAND DISPOSAL RESTRICTION INSPECTION

WASTE IDENTIFICATION

1. Does the facility handle the following wastes?

   a. F001 through F005 spent solvents

   Yes X No ___ List* F001 - F003, F005

   b. Dioxin-containing Wastes

   Yes ___ No X List* ___

   c. California List Wastes

   Yes X No ___ List* Spent Solvents

   d. First and Second Third Wastes

   Yes ___ No X List* ___

   * List wastes if room allows or attach Appendix A.

   Note: Please be aware of potential misclassification of wastes (i.e., California list/"soft hammer"/characteristic waste applicabilities).

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

   a. F001 - F005 contaminated soil or debris resulting from a CERCLA response action or RCRA corrective action (effective date — 11/08/90).

   Yes ___ No X Comments ___

   b. Dioxin contaminated soil and debris resulting from a CERCLA response action or a RCRA corrective action (effective date — 11/08/90).

   Yes ___ No X Comments ___

   c. California list contaminated soil or debris resulting from a CERCLA response action or a RCRA corrective action (effective date -- 11/08/90).

   Yes ___ No X Comments ___

d. First Third wastes with the following waste codes: K048, K049, K050, K051, K052, or K071 (effective date - 08/08/90).

Yes ___ No X Comments _____

e. First Third contaminated soil and debris which have a treatment standard based on incineration - K016, K018, K019, K020, K022, K024, K030, K037, K048-K052, K086, K087, K101, K102, K103, and K104 (effective date — 08/08/90).

Yes ___ No X Comments _____

f. Second Third contaminated soil and debris which have a treatment standard based on incineration - 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, U109, U221, U223, U235 (effective date — 06/08/91).

Yes ___ No X Comments _____

RCRA LAND DISPOSAL RESTRICTION INSPECTION

GENERATOR CHECKLIST

GENERATOR REQUIREMENTS

A. Treatability Group - Treatment Standards Identification

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

   Yes X No ___ NA ___

   If yes, check the appropriate treatability group.

   ___ Wastewaters containing solvents (less than or equal to 1% total organic carbon (TOC) by weight)
   X All other spent solvent wastes

N/A

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

   Yes ___ No ___ NA ___

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

Waste Code	Wastewater*	Non-wastewater

* Less than 1% TOC by weight and less than 1% filterable solids.

N/A (No PCB's)

3. California List Wastes: Has the generator correctly identified the required treatment technology [268.42]?

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

      Yes ___ No ___ NA ___

      If yes, specify the method: _____

b. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 500 ppm, is the waste incinerated [40 CFR 761.70] or disposed of by other approved alternate methods [40 CFR 761.60(e)]?

Yes ___ No ___ NA ___

If an alternative method is used, specify the method and state whether the facility has received approval from the Regional Administrator or Director, Exposure Evaluation Division, for an exemption from the incineration requirement:

___

___

___

c. For hazardous waste that contains halogenated organic compounds (HOCs) in total concentrations greater than or equal to 1,000 mg/L or 1,000 mg/Kg (except dilute HOC wastewater), is the waste incinerated in accordance with existing requirements of 40 CFR Part 264 Subpart O or 40 CFR Part 265 Subpart O?

Yes ___ No ___ NA ___

4. Does the generator mix restricted wastes with different treatment standards?

Yes ___ No X Comments ___

If yes, did the generator select the most stringent treatment standards (268.41(b), 268.43(b))?

Yes ___ No ___ Comments ___

B. Waste Analysis

1. Does the generator determine whether the restricted waste exceeds treatment standards or prohibition levels at the point of generation by:

- Knowledge of waste Yes X No ___

List the wastes for which "applied knowledge" was used and describe the basis of the applied knowledge determination.
Additionally, all waste are analyzed on site.

Was all supporting data retained on-site, [268.7(a)(5)]?

Yes X No ___

- TCLP Yes ___ No X NA ___

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.

___

___

___

- Total constituent analysis Yes ___ No X NA ___

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.

___

___

___

- pH ≤ 2 Yes ___ No X NA ___

List the wastes for which pH testing was used.

___

- Paint Filter Liquid Test Yes ___ No X NA ___

List the wastes for which PFLT was used.

___

2. Does the facility dilute the restricted waste as a substitute for adequate treatment [268.3]?

Yes ___ No X NA ___

C. Management

1. On-Site Management

Is restricted waste treated, stored for greater than 90 days, or disposed on-site?

Yes X No ___ Comments Site has interim status for storage.

If yes, the TSD Checklist must be completed.

2. Off-Site Management

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

Yes X No ___ (If no, go to b)

If yes, identify waste code and off-site treatment or storage facilities:

Waste Code	Facilities	Treat/Store
F001-F003, F005	Safety-Kleen in	Treatment
	Dalton, IL & Clarksville,	
	MO & Hebron, OH	

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

Yes X No ___

- Does notification contain the following?

EPA Hazardous waste number(s)	Yes X	No ___
Applicable treatment standards and prohibition levels	Yes X	No ___
Manifest number	Yes X	No ___
Waste analysis data, if available	Yes X	No ___

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

Yes ___ No X (If no, go to c)

If yes, identify waste code and off-site disposal facilities:

Waste Code	Facility

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

  Yes ___ No ___

- Does notification contain the following?

EPA Hazardous waste number(s)	Yes ___	No ___
Applicable treatment standards and prohibition levels	Yes ___	No ___
Manifest number	Yes ___	No ___
Waste analysis data, if available	Yes ___	No ___
Certification that the waste meets treatment standards [wording in 268.7(a)(2)(ii)]	Yes ___	No ___

c. Is the waste subject to a nationwide variance, case-by-case extension (268.5), or no migration petition (268.6).

   Yes ___ No X (If no, go to d)

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

  Yes ___ No ___

- Does the notification contain the following information?

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

d. Does the facility generate any First or Second Third "soft hammer" waste?

   Yes ___ No X (If no, go to 4)

- Does the generator provide the following notification to the receiving facility with each shipment of waste [268.7(a)(4)]?

(i)	EPA hazardous waste number	Yes ___	No ___
(ii)	Applicable prohibition [268.33(f), 268.34(h)]	Yes ___	No ___
(iii)	Manifest number	Yes ___	No ___
(iv)	Waste analysis data, if available	Yes ___	No ___

N/A

3. "Soft Hammer" Demonstrations/Certifications

a. Are any "soft hammer" wastes or treatment residues destined for ultimate disposal in a landfill or surface impoundment?

Yes ___ No ___

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

Yes ___ No ___

c. Has the generator submitted a demonstration and certification to the Regional Administrator to document its efforts to locate practically available treatment [268.8(a)(2)]?

Yes ___ No ___

- If yes, did the generator submit the documentation and certification prior to first shipment?

Yes ___ No ___

d. Does the demonstration contain the following information?

A list of facilities and facility officials contacted?	Yes ___	No ___
Addresses	Yes ___	No ___
Telephone numbers	Yes ___	No ___
Contact dates	Yes ___	No ___
Certification statement	Yes ___	No ___

Attach a copy of the demonstration and certification.

e. If there is no practically available treatment, has the generator included with the demonstration, a written discussion of why the generator was not able to obtain treatment or recovery for that waste [268.8(a)(2)(i)]?

Yes ___ No ___ NA ___

If yes, attach a copy of written discussion.

f. Does the generator ship its "soft hammer" waste off-site for treatment?

Yes ___ No ___

Describe the type of treatment and treatment facilities:

Waste Code	Type of Treatment	Treatment Facility

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

Yes ___ No ___

h. Does the generator provide certification with each subsequent shipment of wastes to receiving facilities?

Yes ___ No ___ NA ___

4. Records Retention

Does the facility retain on-site copies of all notifications, demonstrations, and certifications for a period of 5 years [268.7(a)(6)]?

Yes ✓ No ___ Comments _____

D. RCRA Corrective Action and CERCLA Response Action Waste

1. Has the facility disposed of contaminated soil and debris from a RCRA corrective action or a CERCLA response action in a landfill or surface impoundment?

   Yes ___ No X Comments _____

2. Did the unit meet the minimum technology requirements (double liner, leachate collection system, and ground-water monitoring)?

   Yes ___ No ___ NA X Comments _____

E. Treatment Using RCRA 264/265 Exempt Units or Processes

1. Is waste treated in RCRA 264/265 exempt units (i.e., boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.)?

   Yes X No ___

   List types of waste treatment units and processes:

Waste Code	Type of Treatment	Treatment Units and Processes
F001-F005	Distillation	Distillation unit
F001-F005	Wastewater treatment	Wastewater treatment unit

2. Are treatment residuals generated from these units?

   Yes X No ___ Comments still bottoms; tank bottoms

   If yes, the residues are subject to the LDR generator requirements.

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

   Yes X No ___ NA ___ Comments Placed in on-site recovery process or stored prior to shipment off site.

   If yes, the TSD checklist must be completed.

RCRA LAND DISPOSAL RESTRICTION INSPECTION

TSD CHECKLIST

TSD REQUIREMENTS

A. General Facility Standards

1. Does the waste analysis plan cover Part 268 requirements [264/265.13]?

F-solvent (TCLP)*	Yes X	No ___	NA ___
Dioxin (TCLP)	Yes ___	No ___	NA X
California List (PFLT and/or total constituent analysis)*	Yes X	No ___	NA ___
First & Second Third (TCLP and/or total constituent analysis)	Yes ___	No ___	NA X

* TCLP= Toxicity Characteristic Leaching Procedure (268, App. I)
PFLT= Paint Filter Liquids Test (SW-846)

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

Yes X No ___ Comments _____

a. What date was the waste analysis plan last revised?
12-14-88

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

X On-site ____ Off-site

Identify off-site lab: _____

c. Are F-solvent and dioxin containing waste analyzed using TCLP?

Yes ___ No X NA ___

d. Are California List wastes analyzed using the appropriate analytical method (PFLT filtrate for metals and cyanide; total constituent analysis for corrosive wastes, PCBs and halogenated organic compounds (HOCs).

Yes X No ___ NA ___

e. Are First Third and Second Third wastes analyzed using the appropriate analytical method for the specified BDAT* (i.e., total constituent analysis for destruction technologies and TCLP for stabilization/fixation technologies)? See Appendix B.

Yes ___ No ___ NA X

* BDAT= best demonstrated available technology

3. Are the operating records, including analyses and quantities, complete [264/265.73]?

Yes X No ___

4. Do operating records contain copies of the notification, certification, and demonstration (if applicable) from the generator? Records must be kept until closure of unit.

Yes X No ___ Comments _____

B. Storage (268.50)

1. Are prohibited wastes* stored on-site?

Yes X No ___ (If no, go to C, Treatment.)

* Prohibited wastes are a subset of restricted wastes, i.e., they are those restricted wastes that are currently ineligible for land disposal [53 FR 31208, August 17, 1988].

2. If yes, identify storage unit.

X Tanks
X Containers
___ Other (Identify inappropriate storage unit(s).

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

Yes X No ___ NA ___

4. Do operating records track the location, quantity of the wastes, and dates that the wastes enter and leave storage (264/265.73)?

   Yes X No ___

5. Do operating records agree with container labeling [268.50(a)(2) and 264/265.73]?

   Yes X No ___ NA ___

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

   Yes X No ___ NA ___

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

   Yes X No ___

7. Are all tanks clearly marked with a description of the contents, the quantity of wastes received, and date(s) entering storage, or is such information recorded and maintained in the operating record [268.50(a)(2)]?

   Yes X No ___ NA ___

8. Have wastes been stored for more than 1 year since the applicable LDR regulations went into effect [268.50(c)]?

   Yes ___ No X NA ___

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

   Yes ___ No ___ NA ___

   If yes, state how: _____

   _____

   _____

N/A

9. Has liquid hazardous waste containing PCBs at concentrations greater than or equal to 50 ppm being stored:

   a. In a facility meeting the TSCA criteria in 761.65(b)?

      Yes ___ No ___ NA ___

   b. More than one year [268.50(f)]?

      Yes ___ No ___ NA ___

C. Treatment

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

   Yes X No ___ (If no, go to D, Surface Impoundments.)

2. Describe the waste codes and treatment processes:

Waste Code	Treatment Processes
F001-F005	Distillation; fractionation; Liquid-liquid extraction.

3. Was dilution used as a substitute for treatment [268.3]?

   Yes ___ No X Comments ___

4. Does the facility, in accordance with an acceptable waste analysis plan, test the residue from all treatment processes [268.7(b)]?

   Yes X No ___ Comments ___

   Have treatment standards or prohibition levels been met?

   Yes ___ No X Comments LDR wastes are sent off site for treatment.

5. Does the facility ship any waste or treatment residue to an off-site disposal facility?

   Yes ___ No X NA ___

   If yes, does the treatment facility provide notification and certification to the disposal facility [268.7(b)(4) and (5)]??

   Yes ___ No ___ (If yes, the Generator portion of the checklist must be completed.)

6. If the waste or treatment residue will be further managed at a different treatment or storage facility, has the facility complied with the generator notice and certification requirements [268.7(a)]?

   Yes X No ___

7. Does the facility treat "soft hammer" wastes?

Yes ___ No X (If no, go to 8.)

a. If yes, is the waste treated in accordance with the generator's certification/demonstration [268.8(c)(1)]?

Yes ___ No ___

b. Did the treatment facility certify that the "soft hammer" waste was treated in accordance with the generator's demonstration, [268.8(c)(1)]?

Yes ___ No ___

8. Does the facility ship any "soft hammer" waste to an off-site treatment, recovery, disposal or storage facility?

Yes ___ No X NA ___

If yes, does the treatment facility send a copy of the generator's "soft hammer" demonstration and certification to the receiving treatment, recovery, disposal or storage facility along with its treatment certification [268.8(c)(2)]?

Yes ___ No ___ NA ___

Identify waste codes and off-site facilities:

Waste Code	Facility

9. Are notifications, demonstrations, certifications (if applicable), and results of waste analysis prepared by the generators, kept in the operating record until facility closure [264/265.73(b)]?

Yes X No ___

D. Surface Impoundments

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

   Yes ___ No X List _____ (If no, go to E, Land Disposal.)

2. Are evaporation or dilution the only recognizable treatment occurring in the surface impoundment?

   Yes ___ No ___

3. Did the facility submit to the Agency, the waste analysis plan, as well as, the certification of compliance with minimum technology and ground-water monitoring requirements?

   Yes ___ No ___

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

   Yes ___ No ___ NA ___

5. Have the Subpart F groundwater monitoring requirements been met?

   Yes ___ No ___ NA ___

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

   Yes ___ No ___

   Attach test results.

7. Do the hazardous waste residues (sludges or liquids) exceed the treatment standards specified in 40 CFR 268, or where no treatment standards are established for a waste, the applicable prohibition levels?

   Sludge Yes ___ No ___ Waste Code _____

   Supernatant Yes ___ No ___ Waste Code _____

8. Provide the frequency of analyses conducted on treatment residues:

   _____
   _____
   _____

9. Does the operating record adequately document the results of waste analyses performed in accordance with 40 CFR 268?

   Yes ___ No ___

10. Are sludge residues that exceed the treatment standards and/or prohibition levels removed adequately on an annual basis?

    Yes ___ No ___ Comments _____

    a. Are adequate precautions taken to protect liners, and do records indicate that liner integrity is inspected?

       Yes ___ No ___

    b. Are residues subsequently managed in another surface impoundment?

       Yes ___ No ___

    c. Are residues treated prior to disposal?

       Yes ___ No ___ Comments _____

       If yes, are waste residues treated on-site or off-site?

       On-site _____ Off-site _____

       Identify waste code and treatment method:

Waste Code	Treatment Method

11. If supernatant is determined to exceed treatment standards, is annual throughput greater than impoundment volume?

    Yes ___ No ___ Comments _____

E. Land Disposal

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

   Yes ___ No X

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

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

   _____

   _____

   _____

2. Does the facility's operating record contain notices, certifications, and "soft hammer" demonstrations from generators/storers/treaters? These records must be maintained until facility closure.

   Yes ___ No ___

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

   Yes ___ No ___

   If yes, at what frequency? _____

   _____

   _____

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

   Yes ___ No ___

5. Does the facility dispose of restricted wastes that are subject to a national capacity variance or the "soft hammer" provisions?

   Yes ___ No ___ Comments _____

   If yes, have the minimum technology requirements been met for all units receiving such wastes?

   Yes ___ No ___

6. Does the facility have notices [268.7(a)(3)] and records for disposed wastes that are subject to national capacity variances, case-by-case extensions [268.5], no migration petitions [268.6], or a variance fr treatment standards?

   Yes ___ No ___ NA ___

7. If the facility has a case-by-case extension, is the facility making progress as described in progress reports?

   Yes ___ No ___ NA ___

8. Are restricted wastes placed in underground injection wells?

   Yes ___ No ___ List _____

Illinois Environmental Protection Agency
Division of Land Pollution Control

INSPECTION REPORT

USEPA #: IL D005450697	IEPA #: 0316000053
Facility Name: SAFETY-KLEEN CORP. CHGO. RC	Phone #: (312) 650-1467
Street Address: 1445 W. 42ND STREET	County: COOK
City: CHICAGO	State: ILLINOIS Zip: 60609
Region: MAYWOOD	Inspection Date: 1/19/90 From: 9:00 am To: 2:00pm
Weather: 30°	

TYPE OF FACILITY

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

TYPE OF INSPECTION

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

Record Review: ____ Follow-Up to Inspection of: ____ Withdrawal: ____

NON-REGULATED STATUS

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: 11/9/88

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

PART B PERMIT APPLICATION

Part B Permit called by (US)(IL) EPA on: 5/6/88 Permit Due: 1/8/89

Part B Permit Submitted: 11/9/88 Draft Permit Issued: __/__/__

ENFORCEMENT

Has firm been referred to: USEPA? NO IAG? NO County SA? NO

Date(s) of initial referral: __/__/__ __/__/__ __/__/__

USEPA CACO: __/__/__ CAFO: __/__/__ ALJ Decision: __/__/__

Referral to DOJ by USEPA: __/__/__ Federal Court Order Issued: __/__/__

PCB Order Issued: __/__/__ State Court Order Issued: __/__/__

TSD FACILITY ACTIVITY SUMMARY

Activity by Process Code	On 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 88	87	86
S01	YES	YES	YES	NO	YES	N/A	NO	YES	YES
S02	YES	YES	YES	NO	YES	N/A	NO	YES	YES
R03	N/A	YES	YES	N/A	YES	721.106(C)(1) 725.101(C)(6)	YES	YES	YES

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SUMMARY OF APPARENT VIOLATIONS

OWNER	OPERATOR
Name SAFETY-KLEEN CORP.	Name SAFETY-KLEEN CORP.
Address 777 BIG TIMBER ROAD	Address 1445 W. 42ND STREET
City ELGIN	City CHICAGO
State ILLINOIS Zip 60123	State ILLINOIS Zip 60609
Phone # (708) 697-8460	Phone # (312) 650-1467

PERSON(S) INTERVIEWED	TITLE	PHONE #
TOM HILLSTROM	FACILITY MANAGER	(312) 650-1467
ALFRED AGHAIEPOUR	ASSISTANT FACILITY MANAGER	(312) 650-1482

INSPECTION PARTICIPANT(S)	AGENCY/TITLE	PHONE #
DONNA CZECH	IEPA / EPS	(708) 345-9780

PREPARED BY	AGENCY/TITLE	PHONE #
DONNA CZECH	IEPA / EPS	(708) 345-9780

Area	Class	Section

Area	Class	Section

Area	Class	Section

Facility Name: SAFETY-KLEEN CORP.

USEPA #: ILD005450697

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: * 8 8	On Annual Report for: * 8 7	On Annual Report for: * 8 6	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	YES	YES	YES	9547 gal. (bulk) + 123 drums	20,000 gal./month	1-11-90	SAFETY-KLEEN in DOLTON, ILLINOIS or CLARKSVILLE, MISSOURI for FUEL BLENDING or FURTHER RECLAMATION
MISCELLANEOUS DRUMMED WASTE	-CLEANING OUT TANKS -USED OIL DRY -DRIPPINGS FROM HOSE LINES -"CUTTER DRUMS"	EVERY SHIPMENT ANALYZED	F001 F002	YES	YES	YES	NO	NO	130 drums	100-150 drums/year	12-5-89	SAFETY-KLEEN in DOLTON, ILLINOIS for FUEL BLENDING or ROLLINS in DEERPARK, TEXAS for INCINERATION
REMANIFESTED WASTE	-TEMPORARY STORAGE -SHIPPED FOR FURTH. RECL. -WASTE SENT IN ERROR	EVERY SHIPMENT ANALYZED	F001 F002 D001	YES	YES	YES	NO	NO	5 drums	max. 25,000 gal./year	12-5-89	SAFETY-KLEEN in DOLTON, ILLINOIS or HEBRON, OHIO
WASTE FILTERS	USED TO FILTER WASTE AS IT IS PUMPED INTO TANKS	EVERY SHIPMENT ANALYZED	F001 F002 F003 F005	YES	YES	YES	NO	NO	8 drums	less than 60 drums per year	12-11-89	ROLLINS in DEERPARK, TEXAS for INCINERATION or SAFETY-KLEEN in Hebron, Ohio
TANK BOTTOMS	CLEANING OUT TANKS WHICH CONTAIN NON-HAZARDOUS MATERIALS	MIXED WITH HAZ. WASTE	NON-HAZ.	N/A	N/A	N/A	N/A	N/A	NONE	50 drums/year	12-11-89	SAFETY-KLEEN in DOLTON, ILLINOIS for FUEL BLENDING or to HEBRON, OHIO.

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

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 80-85 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 gallons are generated per month
   - shipped to Safety-Kleen in Dolton, Illinois or Clarksville, Missouri for fuel blending or further reclamation
   - 1-2 shipments are made every week
   - 9,547 gallons were on-site in bulk storage and 123 drums were on-site in the container storage area

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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 100-150 drums are generated per year
   - shipped to Safety-Kleen in Dolton, Illinois for fuel blending or to Rollins in Deerpark, Texas for incineration
   - shipments are made approximately three times per year
   - 130 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)
   - no more than 25,000 gallons are generated per year
   - shipped to Safety-Kleen in Dolton, Illinois or Hebron, Ohio for reclamation
   - at most, shipments are made five times per year
   - five drums were on-site

4. Waste Filters (F001, F002, F003, F005)
   - used to filter waste as it is pumped into tanks
   - less than 60 drums are generated per year
   - shipped to Rollins in Deerpark, Texas for incineration or to Safety-Kleen in Hebron, Ohio
   - at most, three shipments are made per year
   - eight drums were on-site

<u>Non-Hazardous Wastes</u>

Tank Bottoms
- from cleaning out tanks which contain non-hazardous materials
- approximately 50 drums are generated per year
- mixed with hazardous wastes and shipped to Safety-Kleen in Dolton, Illinois or Safety-Kleen in Hebron, Ohio for fuel blending
- two to three shipments are made per year
- none was on-site

Hazardous Waste Units

1. Truck Stations #1, #2 and #3
   - used for loading and unloading of waste materials
   - Truck Station #1 is used for tankers; Truck Stations #2 and #3 are used for truck trailers
   - all are fitted with a concrete floor, curbs, and walls
   - Truck Station #1 is covered with a roof which prevents stormwater from coming into contact with hazardous wastes or contaminated areas

2. 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
   - 1,214 drums were located in this area

3. S02 - Tank #199
   - located on the north side of Container Storage Area #1
   - 7,600-gallon horizontal carbon steel tank
   - formerly used to store hazardous and non-hazardous wastes
   - currently empty and decontaminated in anticipation of closure which is expected by March 1, 1990

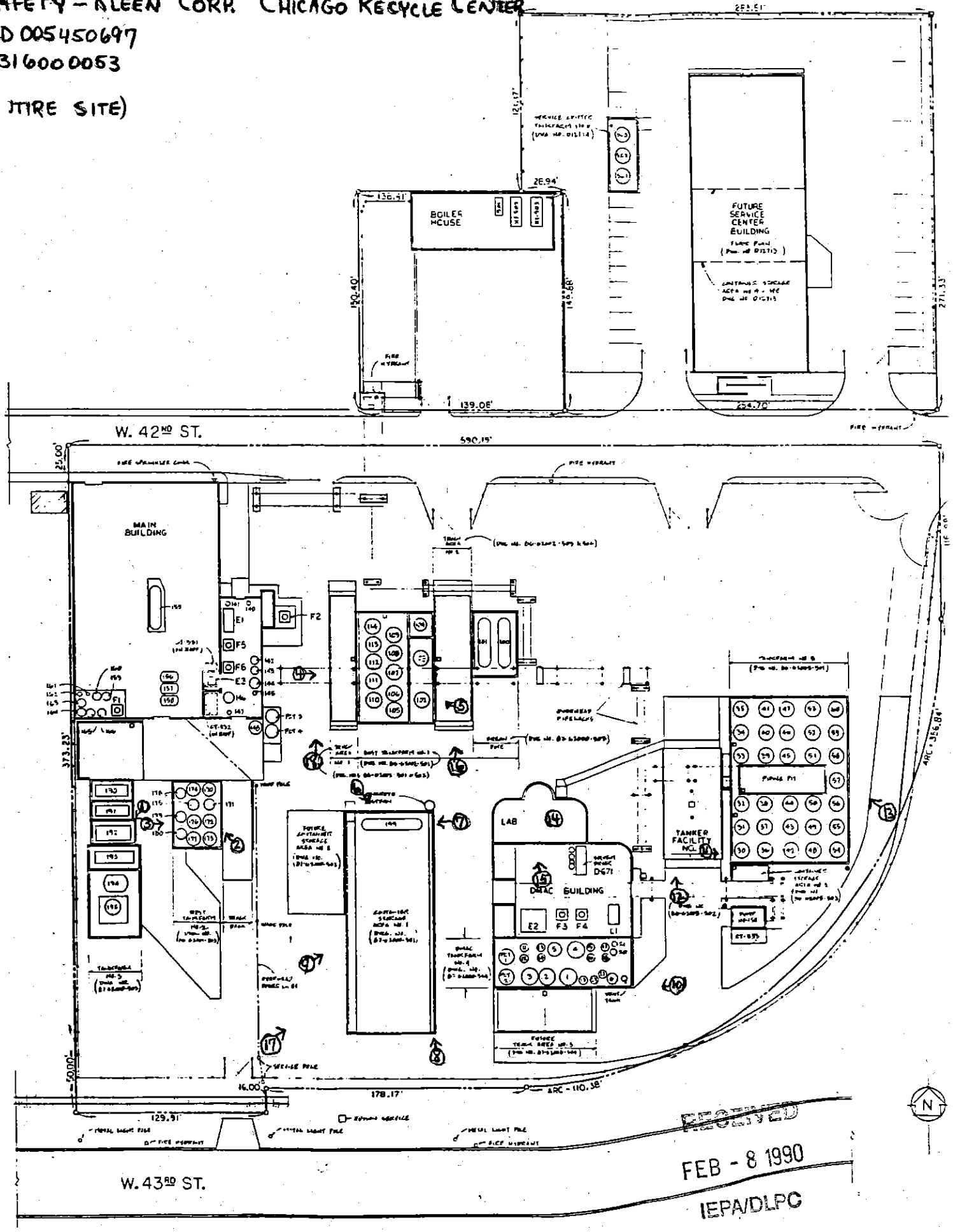
4. S02 - Tank Farms #1, #2, #3, #4, and #5
   - all are constructed of reinforced concrete with concrete perimeter dikes
   - Tank Farms #1, #2, #3 and #5 have been provided with an impermeable coating as an addition to the existing secondary containment
   - partial closure of Tank Farm #1 is anticipated by March 1, 1990 (Tanks #105-#114 which were still active on the date of inspection)

At the time of inspection, this facility appeared to be operating in compliance with applicable RCRA regulations.

DC:sa:1003s

SAFETY-KLEEN CORP. CHICAGO RECYCLE CENTER
ILD 005450697
0316000053

(TIRE SITE)



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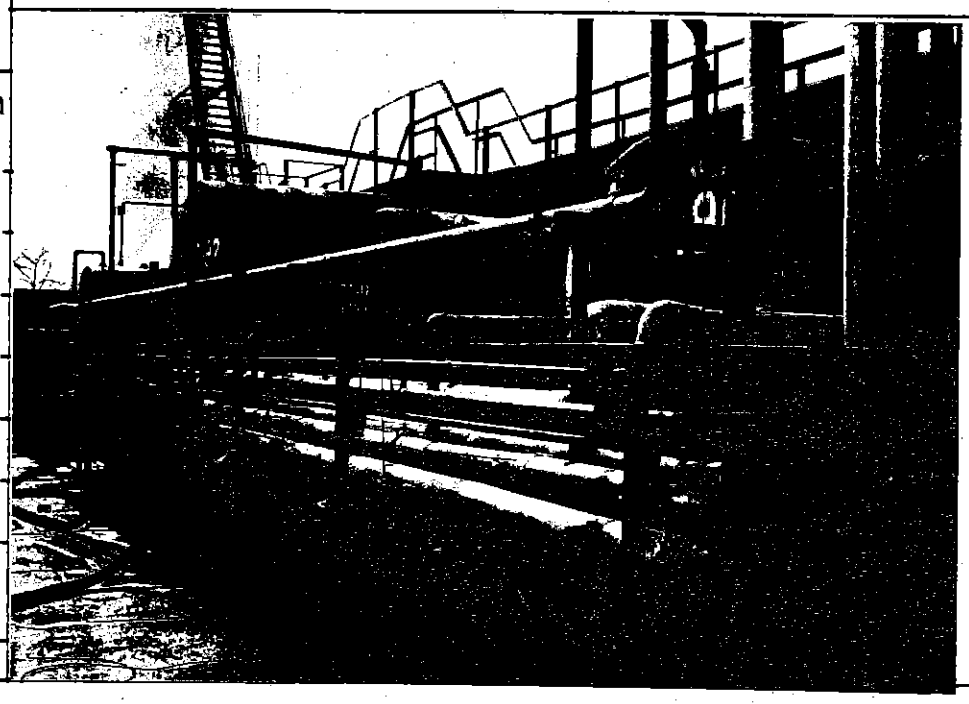
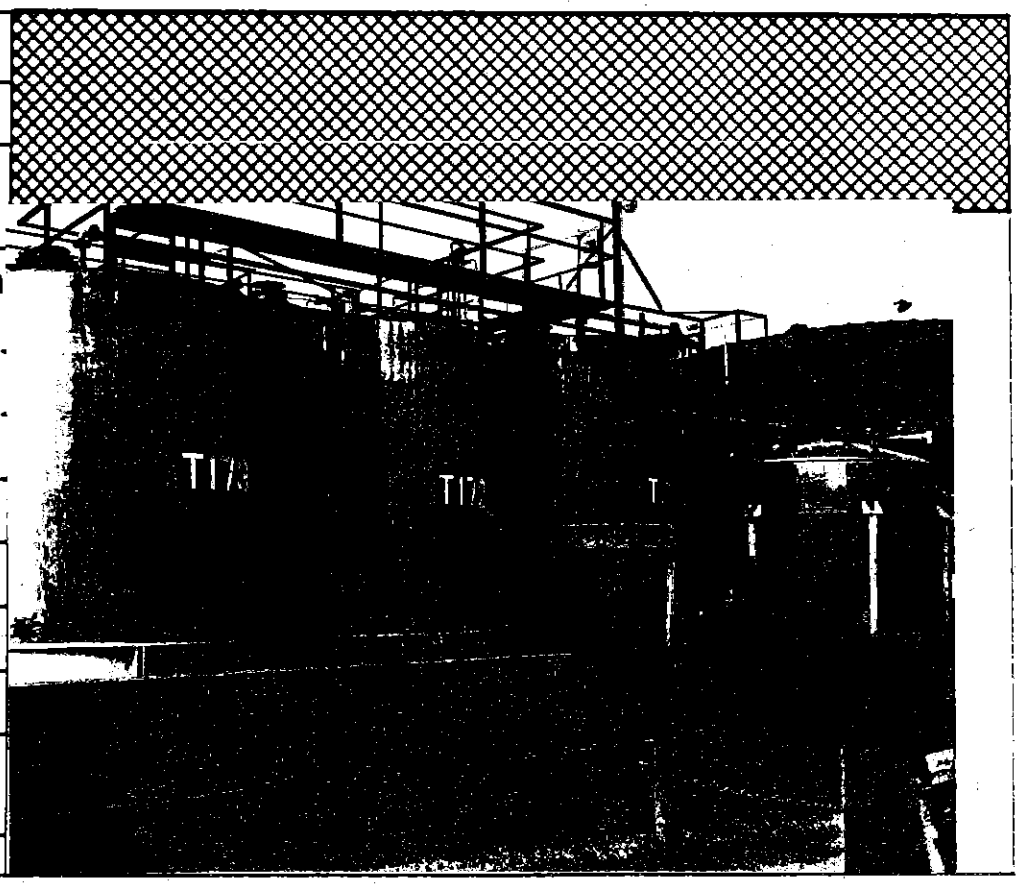
INSPECTION PHOTOS

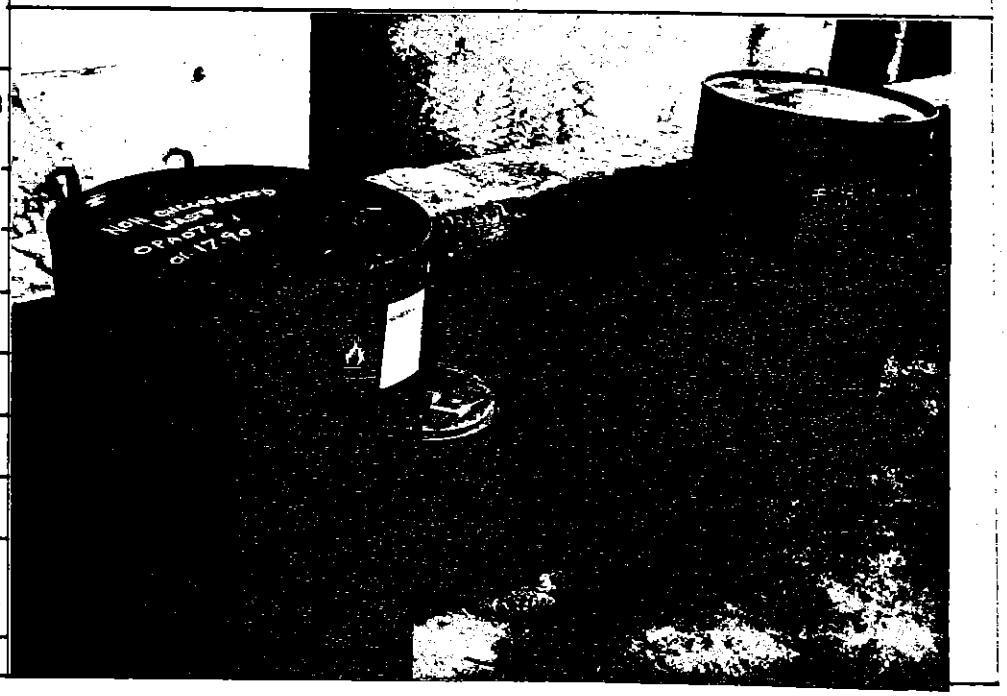
DATE: 1 / 19 / 90	Site #: 0 3 1 6 0 0 0 0 5 3 Co.: Cook
TIME: 9:00am - 2:00pm	Site Name: Safety-Kleen Corp. Chgo. RC
PHOTOGRAPH TAKEN BY: D. Czech	File: FOS
COMMENTS: Pictures taken toward: SOUTHWEST	
TANK FARM #3	
Roll #: 90-181 Photo #: 1	



DATE: 1 / 19 / 90	
TIME: 9:00am - 2:00pm	
PHOTOGRAPH TAKEN BY: D. Czech	
COMMENTS: Pictures taken toward: WEST	
TANK FARM #2	
Roll #: 90-181 Photo #: 2	



INSPECTION PHOTOS

DATE: 1 / 19 / 90	Site #: 0 3 1 6 0 0 0 0 5 3 Co.: Cook
TIME: 9:00am - 2:00pm	Site Name: Safety-Kleen Corp. Chgo. RC
PHOTOGRAPH TAKEN BY: D. Czech	File: FOS
COMMENTS: Pictures taken toward: EAST SATELLITE ACCUMULATION AREA ON THE WEST SIDE OF TANK FARM #2.	
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DATE: 1 / 19 / 90	
TIME: 9:00am - 2:00pm	
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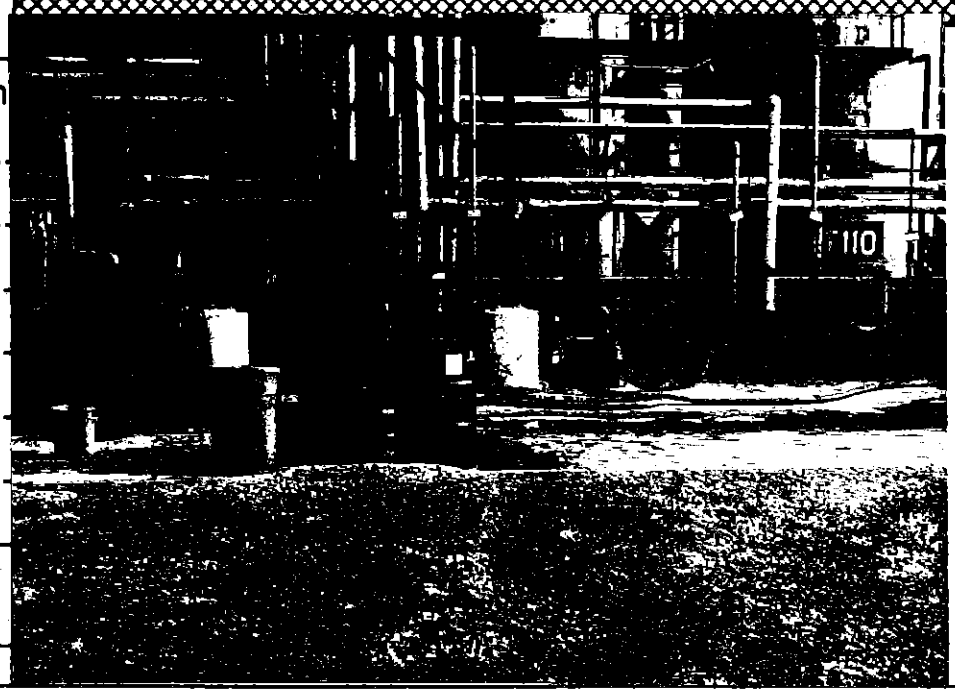
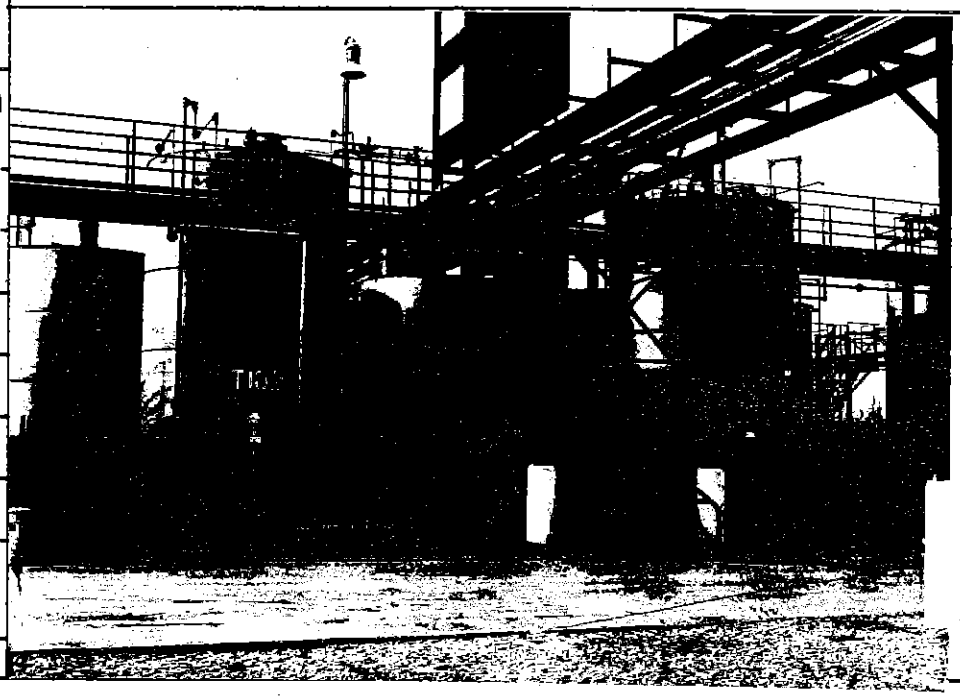
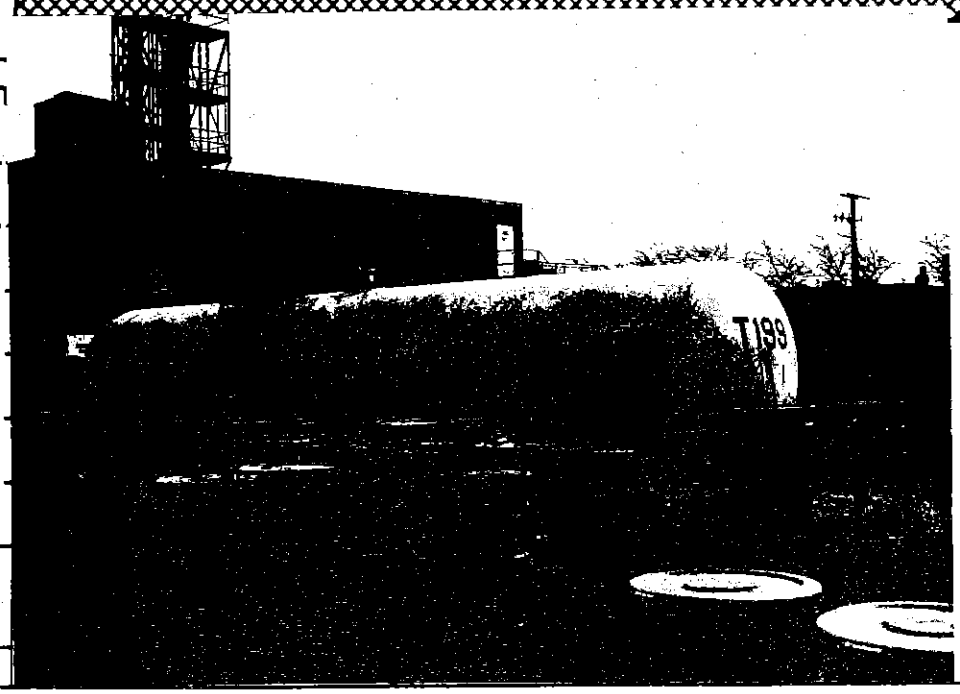
COMMENTS: Pictures taken toward: EAST SATELLITE ACCUMULATION AREA ON THE WEST SIDE OF TANK FARM #1.	
Roll #: 90-181 Photo #: 4	

INSPECTION PHOTOS

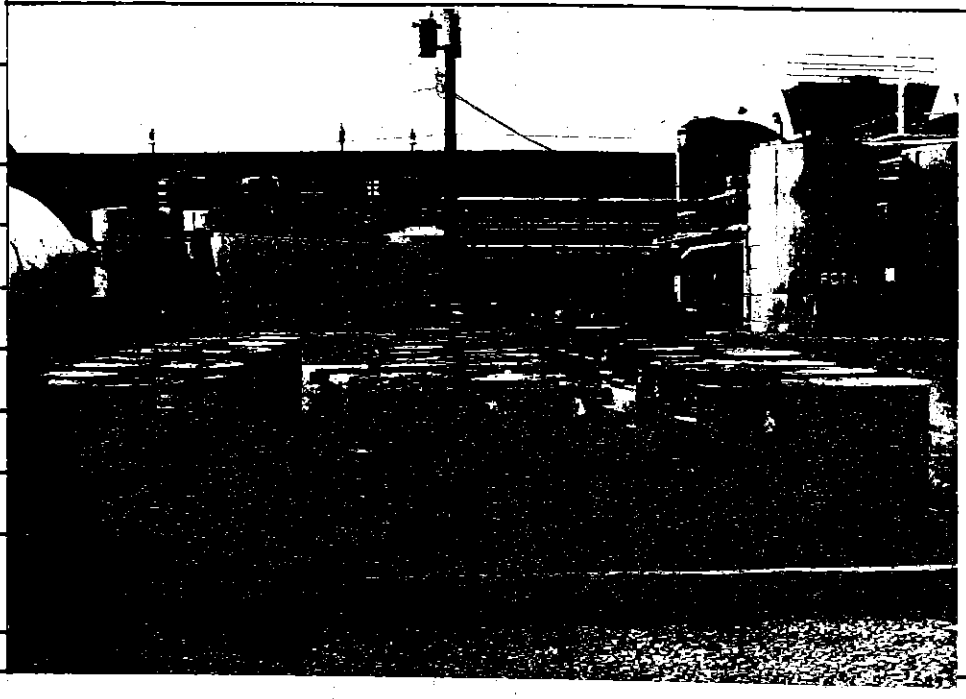
DATE: 1 / 19 / 90	Site #: 0 3 1 6 0 0 0 0 5 3 Co.: Cook
TIME: 9:00am - 2:00pm	Site Name: Safety-Kleen Corp. Chgo. RC
PHOTOGRAPH TAKEN BY: D. Czech	File: FOS
COMMENTS: Pictures taken toward: WEST	
TANK FARM #1	
Roll #: 90-181 Photo #: 5	

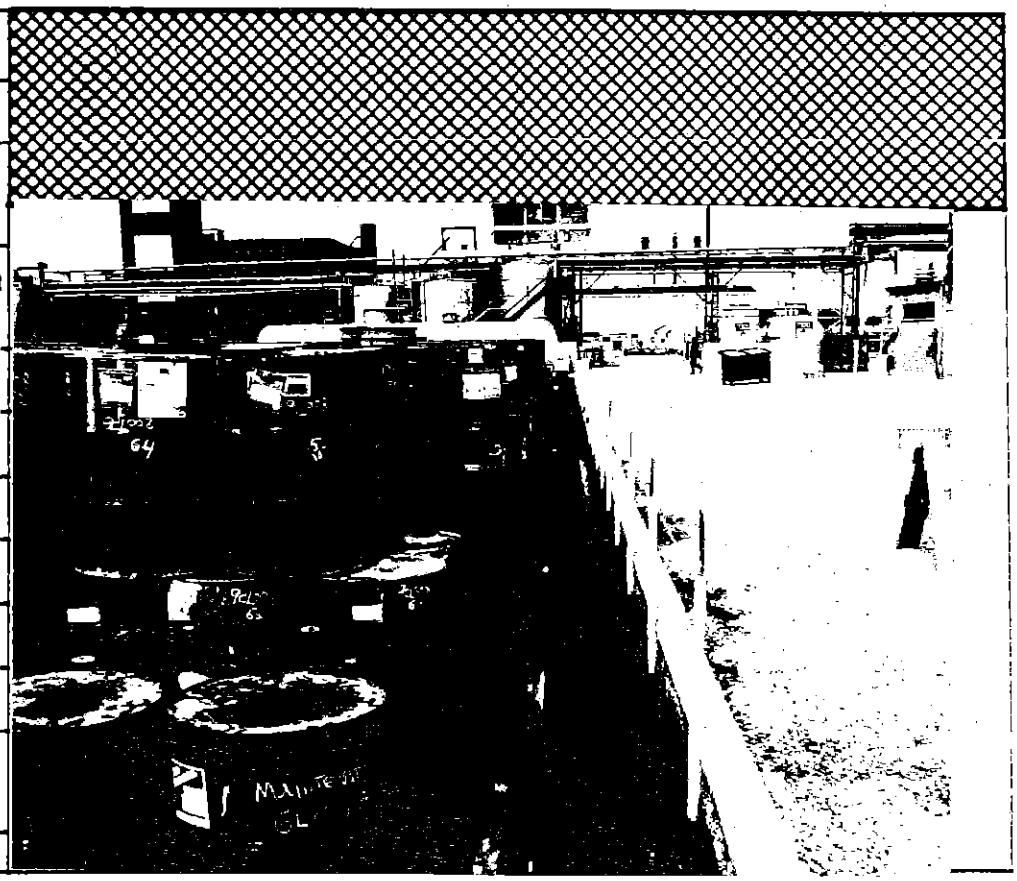


DATE: 1 / 19 / 90	
TIME: 9:00am - 2:00pm	
PHOTOGRAPH TAKEN BY: D. Czech	
COMMENTS: Pictures taken toward: SOUTHEAST	
TANK #199 LOCATED IN	
CONTAINER STORAGE AREA #1	
Roll #: 90-181 Photo #: 6	



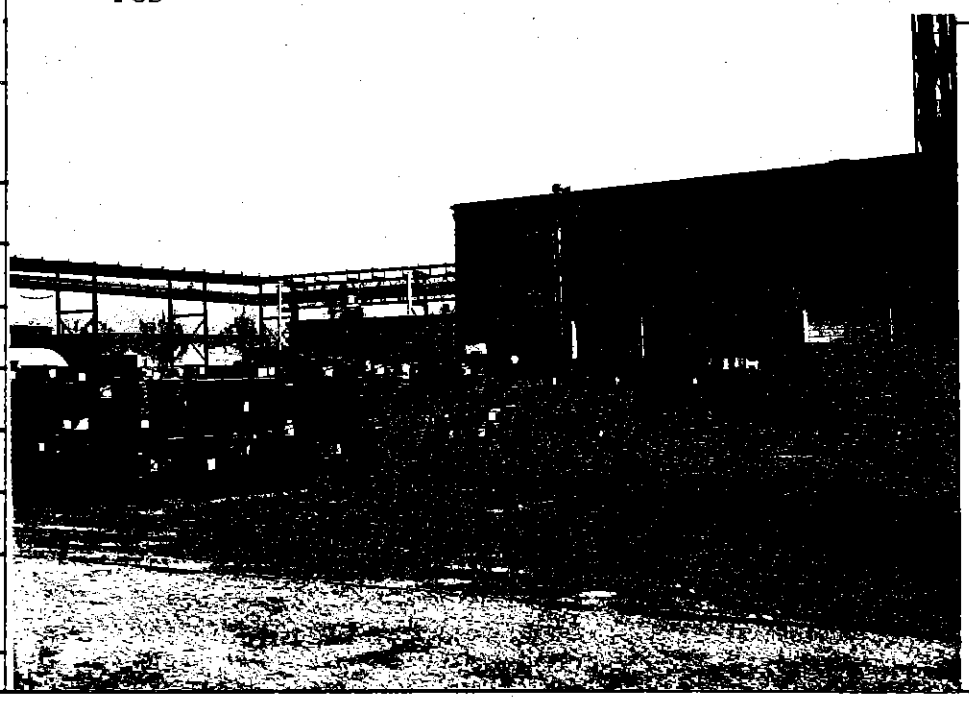
INSPECTION PHOTOS

DATE: 1 / 19 / 90	Site #: 0 3 1 6 0 0 0 0 5 3 Co.: Cook
TIME: 9:00am - 2:00pm	Site Name: Safety-Kleen Corp. Chgo. RC
PHOTOGRAPH TAKEN BY: D. Czech	File: FOS
COMMENTS: Pictures taken toward: WEST	
CONTAINER STORAGE AREA #1	
Roll #: 90-181 Photo #: 7	

DATE: 1 / 19 / 90	
TIME: 9:00am - 2:00pm	
PHOTOGRAPH TAKEN BY: D. Czech	
COMMENTS: Pictures taken toward: NORTH	
TRENCH RUNNING ALONG THE EAST SIDE OF CONTAINER STORAGE AREA #1	
Roll #: 90-181 Photo #: 8	

INSPECTION PHOTOS

DATE: 1 / 19 / 90	Site #: 0 3 1 6 0 0 0 0 5 3 Co.: Cook
TIME: 9:00am - 2:00pm	Site Name: Safety-Kleen Corp. Chgo. RC
PHOTOGRAPH TAKEN BY: D. Czech	File: FOS
COMMENTS: Pictures taken toward: NORTHEAST	
CONTAINER STORAGE AREA #1	
Roll #: 90-181 Photo #: 9	



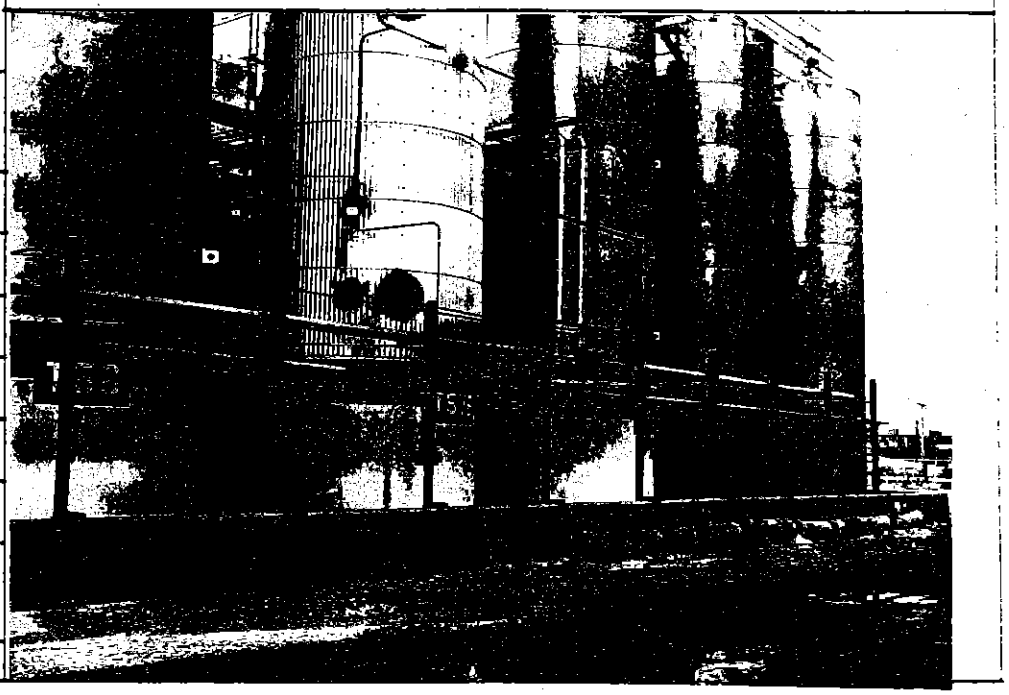
DATE: 1 / 19 / 90	
TIME: 9:00am - 2:00pm	
PHOTOGRAPH TAKEN BY: D. Czech	
COMMENTS: Pictures taken toward: WEST	
TANK FARM #4	
Roll #: 90-191 Photo #: 10	

INSPECTION PHOTOS

DATE: 1 / 19 / 90	Site #: 0 3 1 6 0 0 0 0 5 3 Co.: Cook
TIME: 9:00am - 2:00pm	Site Name: Safety-Kleen Corp. Chgo. RC
PHOTOGRAPH TAKEN BY: D. Czech	File: FOS
COMMENTS: Pictures taken toward: EAST SATELLITE ACCUMULATION AREA LOCATED INSIDE TRUCK STATION #1	
Roll #: 90-191 Photo #: 11	

DATE: 1 / 19 / 90	
TIME: 9:00am - 2:00pm	
PHOTOGRAPH TAKEN BY: D. Czech	
COMMENTS: Pictures taken toward: NORTH TRUCK STATION #1	
Roll #: 90-191 Photo #: 12	

INSPECTION PHOTOS

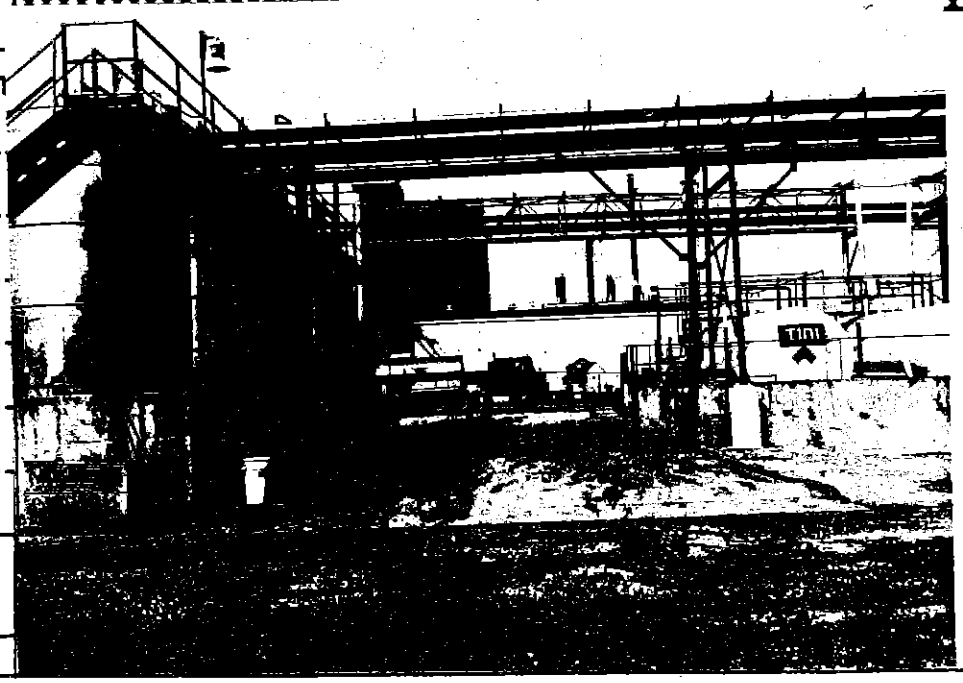
DATE: 1 / 19 / 90	Site #: 0 3 1 6 0 0 0 0 5 3 Co.: Cook
TIME: 9:00am - 2:00pm	Site Name: Safety-Kleen Corp. Chgo. RC
PHOTOGRAPH TAKEN BY: D. Czech	File: FOS
COMMENTS: Pictures taken toward: NORTHWEST TANK FARM #5	
Roll #: 90-191 Photo #: 13	

DATE: 1 / 19 / 90	
TIME: 9:00am - 2:00pm	
PHOTOGRAPH TAKEN BY: D. Czech	
COMMENTS: Pictures taken toward: 2-GALLON CONTAINERS FOR LABORATORY WASTE. THIS CONTAINER IS LOCATED IN THE MAIN LABORATORY.	
Roll #: 90-191 Photo #: 14	

INSPECTION PHOTOS

DATE: 1 / 19 / 90	Site #: 0 3 1 6 0 0 0 0 5 3 Co.: Cook
TIME: 9:00am - 2:00pm	Site Name: Safety-Kleen Corp. Chgo. RC
PHOTOGRAPH TAKEN BY: D. Czech	File: FOS
COMMENTS: Pictures taken toward: NORTH	
SATELLITE ACCUMULATION	
AREA LOCATED INSIDE	
PROCESS BUILDING #2	
Roll #: 90-191 Photo #: 15	

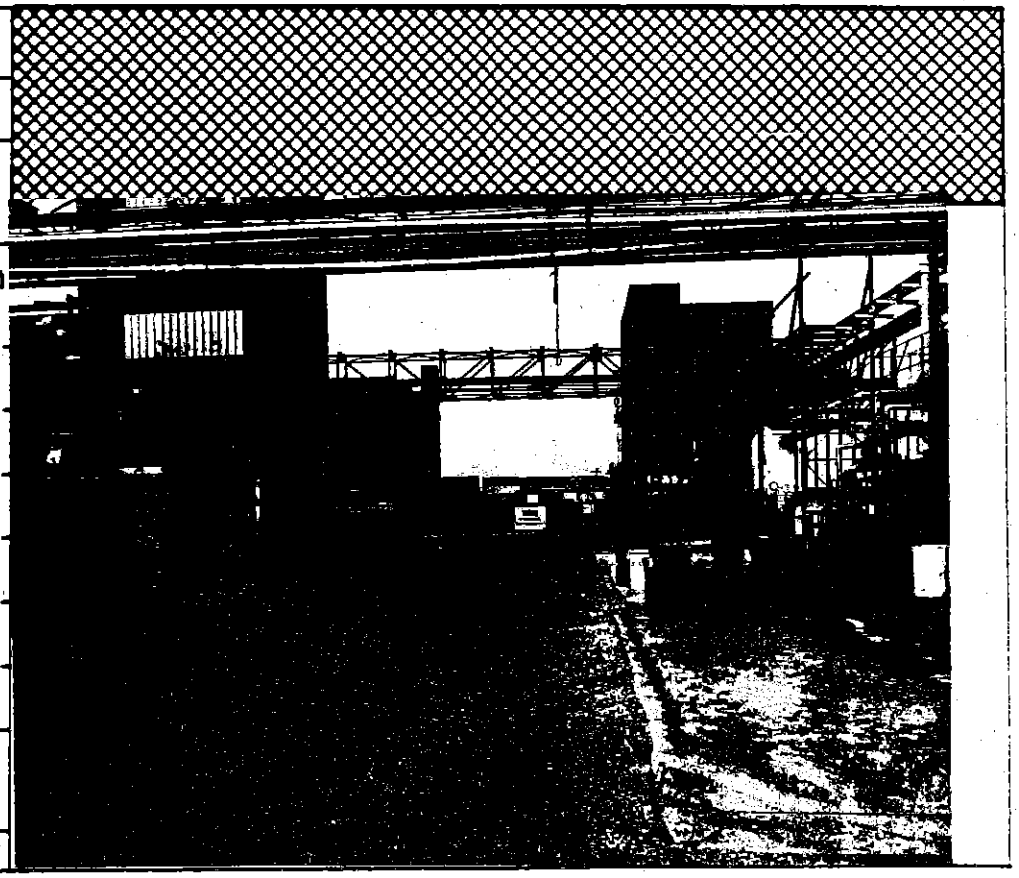
DATE: 1 / 19 / 90	
TIME: 9:00am - 2:00pm	
PHOTOGRAPH TAKEN BY: D. Czech	
COMMENTS: Pictures taken toward: NORTH	
TRUCK STATION #3	
Roll #: 90-191 Photo #: 16	



INSPECTION PHOTOS

DATE: 1 / 19 / 90	Site #: 0 3 1 6 0 0 0 0 5 3 Co.: Cook
TIME: 9:00am - 2:00pm	Site Name: Safety-Kleen Corp. Chgo. RC
PHOTOGRAPH TAKEN BY: D. Czech	File: FOS
COMMENTS: Pictures taken toward: NORTHEAST	
CONTAINER STORAGE AREA #1	
Roll #: 90-212 Photo #: 17	

DATE: 1 / 19 / 90	
TIME: 9:00am - 2:00pm	
PHOTOGRAPH TAKEN BY: D. Czech	
COMMENTS: Pictures taken toward: NORTH	
TRUCK STATION #2	
Roll #: 90-212 Photo #: 18	



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 ✓				

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Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
OTH	1			**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	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 ___				

TI 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.
				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
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 ___				

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?				OHIO USES ILLINOIS MANIFESTS
				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 ____				MISSOURI
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.**	✓			IF TRANSPORTER DOES NOT HAVE PLACARDS, S-K PROVIDES THEM
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.**	✓			THE ONLY ON-SITE ACCUMULATION THAT IS NOT STORAGE IS SATELLITE ACCUMULATION AT VARIOUS AREAS.
			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.
			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 ___				

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 ACUTELY HAZARDOUS WASTE GENERATED

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 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	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**			✓	NONE REQUIRED
			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 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.
				- 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?			✓	NO ADDITIONAL REPORTS 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 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 256 8/87

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 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**	✓			
				Does the facility qualify for any of the exemptions under Section 725.101(c)? Yes ✓ No ____				RECLAMATION OF RECYCLABLE MATERIALS
				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 ✓				

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.
				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 ✓				
			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 ____				
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
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.
			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 532-1592
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.
				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 ___ N/A ✓				SAFETY-KLEEN PERFORMS ANALYSES PRIOR TO AGREEMENT TO ACCEPT WASTE FROM OFF-SITE GENERATORS.

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 ✓				NO SIGNIFICANTLY DIFFERENT WASTES BEING STORED IN TANKS.
				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 ✓				

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.				

IL 532-1592
PC 250 8/87

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
OTH	2			**Section 725.115: 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 ____				
				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
IPC 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 ✓				NO AUTOMATIC WASTE FEED CUTOFF SYSTEMS
				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 ✓				NOT A LAND DISPOSAL FACILITY
				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 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.
				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

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 ___				

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.
				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 532-1592
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** **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 532-1502

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 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	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
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 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
				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 ARE THE PRIMARY AUTHORITY
				3) Agreements with State emergency response teams, emergency response contractors and equipment suppliers? Yes ____ No ____ N/A ✓				THESE ARRANGEMENTS NOT DEEMED NECESSARY
				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 ____				U. of. I Medical Center Bazell Medical Center
				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 TO COOPERATE

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 ___				
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 ___				
				2) Hospitals? Yes ✓ No ___				
				3) Contractors? Yes ___ No ___ N/A ✓				THESE ARRANGEMENTS NOT DEEMED NECESSARY
				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 532-1502
IDC 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 ___				

IL 532-1502
PC 250 0787

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 ✓				
			b	2) The plan fails in an emergency? Yes ____ No ____ N/A ✓				
			c	3) The facility changes - in its design, construction, operation, maintenance or other circumstances - in a way that materially increases the potential for fires, explosions, or releases of hazardous waste or hazardous waste constituents or changes the response necessary in an emergency? Yes ____ No ____ N/A ✓				
			d	4) The list of emergency coordinators changes? Yes ✓ No ____				
			e	5) The list of emergency equipment changes? Yes ✓ No ____				
OTH	2			**Section 725.155: Emergency Coordinator**	✓			
				Is there an emergency coordinator on-site or on-call at all times? 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	1/2			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 ___ **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.**	✓			1987: SPILL OF NON-HAZARDOUS MATERIAL (DMAC) APPROX. 1300 gal. SPILLED SOIL WAS EXCAVATED

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.
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 BULK 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 ____ N/A ✓				IF THE DISCREPANCY IS NOT RESOLVED, THE LOAD IS REJECTED.

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.
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 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.
				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 ✓				NO SIGNIFICANTLY DIFFERENT WASTES BEING STORED IN TANKS THESE WASTE MANAGEMENT METHODS NOT EMPLOYED
				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 ____				

IL 532-1592
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.
				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.**				NOT REQUIRED

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.
				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 LAND 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:				
				- The Agency? Yes ___ No ___ N/A ✓				
				- 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

IL 532-1502
IPR: 25n 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 ____ Was the hazardous waste accepted without the manifest or shipping paper exempt from the manifesting requirement by 35 Ill. Adm. Code 721.105? Yes ____ No ____ **NOTE: If the answer to both the above questions is "Yes", check "N/A". If the answer to the first question is "Yes" and the second "No", answer the following questions:** Did the owner or operator complete an unmanifested waste report to include the information required in Section 725.176(a) thru (g)? Yes ____ No ____			✓	UNMANIFESTED WASTE IS NOT ACCEPTED.

IL 532-1592
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			Did the owner or operator submit the unmanifested waste report to the Agency within 15 days of receiving the waste? Yes ____ No ____	✓			↓
				Section 725.177: Additional Reports				
				Has the owner or operator submitted to the Agency, as required, reports concerning:				
			a	1) Releases, fires, explosions as specified in Section 725.156? Yes ✓ No ____ N/A ____				
			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
IDPH 258 R/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 ___				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 ✓				

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 LAND 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 LAND 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

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** **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 ___ N/A ✓ **NOTE: Failing the filter test means that the waste contains free liquids.**				
OTH	2			**Section 725.291: Assessment of Existing Tank Systems**	✓			
			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 532-1502
LPC 258 8/87

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
			b	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
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.
			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 ✓				
			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 532-1502
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.
			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.**				VAULT
			f	Is ancillary equipment protected by secondary containment that meets the requirement of Subsections (h) and (c) except for:				

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.
	-			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 ✓				
				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 ✓				
			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 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 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 532-1592
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.
				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**			✓	CLOSURE HAS NOT OCCURRED YET
				NOTE: The requirements of this section apply to closure of tank systems. If no closure is being performed, then skip to Section 725.298.				
			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 ____				
			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 532-1502

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 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 ✓				

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 SUBSTANTIALLY DIFFERENT WASTES 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
LPC 256 8/87

RCRA LAND DISPOSAL RESTRICTION INSPECTION

Facility: SAFETY-KLEEN CORP. CHGO, RC

U.S. EPA I.D. No. : ILD005 450697 031600053

Street: 1445 WEST 42ND STREET

City: CHICAGO State: ILLINOIS Zip: 60609

Telephone: (312) 650-1467

Owner/Operator: SAFETY-KLEEN CORP.

Street: 777 BIG TIMBER ROAD

City: ELGIN State: ILLINOIS Zip: 60123

Telephone: (708) 697-8460

Inspection Date: 1/19/90 Time: 9:00am - 2:00pm

Weather Conditions: 30° CLOUDY

	Name	Agency/Title	Telephone
Inspectors:	DONNA CZECH	IEPA/EPS	(708) 345-9780
Facility Representative:	TOM HILLSTROM	FACILITY MGR.	(312) 650-1467
	ALFRED AGHAIEPOUR	ASST. FACILITY MGR.	(312) 650-1482

	Generate	Transport	Treat	Store	Dispose
F-Solvent	✓			✓	
Dioxin					
California List	✓			✓	
First Third					
Second Third					

Revised 10-20-89

RECEIVED
FEB - 8 1990
IEPA/DLPC

RECEIVED
NOV 2 2 1989
IEPA/DLPC

INSPECTION SUMMARY

FOR FACILITY BACKGROUND, SEE RCRA NARRATIVE

Processes That Generate LDR Wastes

DISTILLATION UNIT

FRACTIONATION UNITS

LIQUID-LIQUID EXTRACTION UNITS

WASTE WATER TREATMENT UNIT

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.

Summary

THE FACILITY APPEARED TO BE OPERATING IN COMPLIANCE WITH LAND DISPOSAL RESTRICTION REGULATIONS.

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 80-85 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 gallons are generated per month
   - shipped to Safety-Kleen in Dolton, Illinois or Clarksville, Missouri for fuel blending or further reclamation
   - 1-2 shipments are made every week
   - 9,547 gallons were on-site in bulk storage and 123 drums were on-site in the container storage area

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 100-150 drums are generated per year
   - shipped to Safety-Kleen in Dolton, Illinois for fuel blending or to Rollins in Deerpark, Texas for incineration
   - shipments are made approximately three times per year
   - 130 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)
   - no more than 25,000 gallons are generated per year
   - shipped to Safety-Kleen in Dolton, Illinois or Hebron, Ohio for reclamation
   - at most, shipments are made five times per year
   - five drums were on-site

4. Waste Filters (F001, F002, F003, F005)
   - used to filter waste as it is pumped into tanks
   - less than 60 drums are generated per year
   - shipped to Rollins in Deerpark, Texas for incineration or to Safety-Kleen in Hebron, Ohio
   - at most, three shipments are made per year
   - eight drums were on-site

<u>Non-Hazardous Wastes</u>

Tank Bottoms
- from cleaning out tanks which contain non-hazardous materials
- approximately 50 drums are generated per year
- mixed with hazardous wastes and shipped to Safety-Kleen in Dolton, Illinois or Safety-Kleen in Hebron, Ohio for fuel blending
- two to three shipments are made per year
- none was on-site

Hazardous Waste Units

1. Truck Stations #1, #2 and #3
   - used for loading and unloading of waste materials
   - Truck Station #1 is used for tankers; Truck Stations #2 and #3 are used for truck trailers
   - all are fitted with a concrete floor, curbs, and walls
   - Truck Station #1 is covered with a roof which prevents stormwater from coming into contact with hazardous wastes or contaminated areas

2. 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
   - 1,214 drums were located in this area

3. S02 - Tank #199
   - located on the north side of Container Storage Area #1
   - 7,600-gallon horizontal carbon steel tank
   - formerly used to store hazardous and non-hazardous wastes
   - currently empty and decontaminated in anticipation of closure which is expected by March 1, 1990

4. 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
   - partial closure of Tank Farm #1 is anticipated by March 1, 1990 (Tanks #105-#114 which were still active on the date of inspection)

At the time of inspection, this facility appeared to be operating in compliance with applicable RCRA regulations.

DC:sa:1003s

RCRA LAND DISPOSAL RESTRICTION INSPECTION

WASTE IDENTIFICATION

1. Does the facility handle the following wastes?

   a. F001 through F005 spent solvents

      Yes ✓ No ___ List* F001, F002, F003, F005

   b. Dioxin-containing Wastes

      Yes ___ No ✓ List* ___

   c. California List Wastes

      Yes ✓ No ___ List* SPENT SOLVENTS

   d. First and Second Third Wastes

      Yes ___ No ✓ List* ___

      * List wastes if room allows or attach Appendix A.

      Note: Please be aware of potential misclassification of wastes (i.e., California list/"soft hammer"/characteristic waste applicabilities).

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

   a. F001 - F005 contaminated soil or debris resulting from a CERCLA response action or RCRA corrective action (effective date — 11/08/90).

      Yes ___ No ✓ Comments ___

   b. Dioxin contaminated soil and debris resulting from a CERCLA response action or a RCRA corrective action (effective date — 11/08/90).

      Yes ___ No ✓ Comments ___

   c. California list contaminated soil or debris resulting from a CERCLA response action or a RCRA corrective action (effective date — 11/08/90).

      Yes ___ No ✓ Comments ___

d. First Third wastes with the following waste codes: K048, K049, K050, K051, K052, or K071 (effective date - 08/08/90).

Yes ___ No ✓ Comments _____

e. First Third contaminated soil and debris which have a treatment standard based on incineration - K016, K018, K019, K020, K022, K024, K030, K037, K048-K052, K086, K087, K101, K102, K103, and K104 (effective date — 08/08/90).

Yes ___ No ✓ Comments _____

f. Second Third contaminated soil and debris which have a treatment standard based on incineration - 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, U109, U221, U223, U235 (effective date — 06/08/91).

Yes ___ No ✓ Comments _____

RCRA LAND DISPOSAL RESTRICTION INSPECTION

GENERATOR CHECKLIST

GENERATOR REQUIREMENTS

A. Treatability Group - Treatment Standards Identification

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

   Yes ✓ No ___ NA ___

   If yes, check the appropriate treatability group.

   ___ Wastewaters containing solvents (less than or equal to 1% total organic carbon (TOC) by weight)
   ✓ All other spent solvent wastes

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

   THESE WASTES NOT GENERATED

   Yes ___ No ___ NA ___

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

Waste Code	Wastewater*	Non-wastewater

   * Less than 1% TOC by weight and less than 1% filterable solids.

3. California List Wastes: Has the generator correctly identified the required treatment technology [268.42]?

   THESE WASTES NOT GENERATED (NO PCBS)

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

      Yes ___ No ___ NA ___

      If yes, specify the method: _____

b. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 500 ppm, is the waste incinerated [40 CFR 761.70] or disposed of by other approved alternate methods [40 CFR 761.60(e)]?

Yes ___ No ___ NA ___

If an alternative method is used, specify the method and state whether the facility has received approval from the Regional Administrator or Director, Exposure Evaluation Division, for an exemption from the incineration requirement:

___

___

___

c. For hazardous waste that contains halogenated organic compounds (HOCs) in total concentrations greater than or equal to 1,000 mg/L or 1,000 mg/Kg (except dilute HOC wastewater), is the waste incinerated in accordance with existing requirements of 40 CFR Part 264 Subpart O or 40 CFR Part 265 Subpart O?

Yes ✓ No ___ NA ___

4. Does the generator mix restricted wastes with different treatment standards?

Yes ___ No ✓ Comments ___

If yes, did the generator select the most stringent treatment standards (268.41(b), 268.43(b))?

Yes ___ No ___ Comments ___

B. Waste Analysis

1. Does the generator determine whether the restricted waste exceeds treatment standards or prohibition levels at the point of generation by:

- Knowledge of waste Yes ✓ No ___

List the wastes for which "applied knowledge" was used and describe the basis of the applied knowledge determination.
ALL WASTE STREAMS GENERATED ON-SITE ARE SAMPLED & ANALYZED BY AN ON-SITE LABORATORY.

Was all supporting data retained on-site, [268.7(a)(5)]?

Yes ✓ No ___

- TCLP Yes ___ No ✓ NA ___

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.

___

___

___

- Total constituent analysis Yes ___ No ✓ NA ___

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.

___

___

___

- pH $\leq$ 2 Yes ___ No ✓ NA ___

List the wastes for which pH testing was used.

___

- Paint Filter Liquid Test Yes ___ No ✓ NA ___

List the wastes for which PFLT was used.

___

2. Does the facility dilute the restricted waste as a substitute for adequate treatment [268.3]?

Yes ___ No ✓ NA ___

C. <u>Management</u>

1. On-Site Management

Is restricted waste treated, stored for greater than 90 days, or disposed on-site?

Yes ✓ No ___ Comments COMPANY IS A STORAGE FACILITY

If yes, the TSD Checklist must be completed.

2. Off-Site Management

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

Yes ✓ No ___ (If no, go to b)

If yes, identify waste code and off-site treatment or storage facilities:

Waste Code	Facilities	Treat/Store
F001, F002	SAFETY-KLEEN in	TREATMENT
F003	DOLTON, ILLINOIS, or	TREATMENT
F005	CLARKSVILLE, MISSOURI, or HEBRON, OHIO	TREATMENT

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

Yes ✓ No ___

- Does notification contain the following?

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

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

Yes ___ No ✓ (If no, go to c)

If yes, identify waste code and off-site disposal facilities:

Waste Code	Facility

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

  Yes ___ No ___

- Does notification contain the following?

EPA Hazardous waste number(s)	Yes ___	No ___
Applicable treatment standards and prohibition levels	Yes ___	No ___
Manifest number	Yes ___	No ___
Waste analysis data, if available	Yes ___	No ___
Certification that the waste meets treatment standards [wording in 268.7(a)(2)(ii)]	Yes ___	No ___

c. Is the waste subject to a nationwide variance, case-by-case extension (268.5), or no migration petition (268.6).

  Yes ___ No ✓ (If no, go to d)

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

  Yes ___ No ___

- Does the notification contain the following information?

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

d. Does the facility generate any First or Second Third "soft hammer" waste?

  Yes ___ No ✓ (If no, go to 4)

- Does the generator provide the following notification to the receiving facility with each shipment of waste [268.7(a)(4)]?

(i)	EPA hazardous waste number	Yes ___	No ___
(ii)	Applicable prohibition [268.33(f), 268.34(h)]	Yes ___	No ___
(iii)	Manifest number	Yes ___	No ___
(iv)	Waste analysis data, if available	Yes ___	No ___

3. "Soft Hammer" Demonstrations/Certifications

a. Are any "soft hammer" wastes or treatment residues destined for ultimate disposal in a landfill or surface impoundment?

Yes ___ No ___

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

Yes ___ No ___

c. Has the generator submitted a demonstration and certification to the Regional Administrator to document its efforts to locate practically available treatment [268.8(a)(2)]?

Yes ___ No ___

- If yes, did the generator submit the documentation and certification prior to first shipment?

Yes ___ No ___

d. Does the demonstration contain the following information?

A list of facilities and facility officials contacted?	Yes ___	No ___
Addresses	Yes ___	No ___
Telephone numbers	Yes ___	No ___
Contact dates	Yes ___	No ___
Certification statement	Yes ___	No ___

Attach a copy of the demonstration and certification.

e. If there is no practically available treatment, has the generator included with the demonstration, a written discussion of why the generator was not able to obtain treatment or recovery for that waste [268.8(a)(2)(i)]?

Yes ___ No ___ NA ___

If yes, attach a copy of written discussion.

f. Does the generator ship its "soft hammer" waste off-site for treatment?

Yes ___ No ___

Describe the type of treatment and treatment facilities:

Waste Code	Type of Treatment	Treatment Facility

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

Yes ___ No ___

h. Does the generator provide certification with each subsequent shipment of wastes to receiving facilities?

Yes ___ No ___ NA ___

4. Records Retention

Does the facility retain on-site copies of all notifications, demonstrations, and certifications for a period of 5 years [268.7(a)(6)]?

Yes ✓ No ___ Comments _____

D. RCRA Corrective Action and CERCLA Response Action Waste

1. Has the facility disposed of contaminated soil and debris from a RCRA corrective action or a CERCLA response action in a landfill or surface impoundment?

   Yes ___ No ✓ Comments _____

2. Did the unit meet the minimum technology requirements (double liner, leachate collection system, and ground-water monitoring)?

   Yes ___ No ___ NA ✓ Comments _____

E. Treatment Using RCRA 264/265 Exempt Units or Processes

1. Is waste treated in RCRA 264/265 exempt units (i.e., boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.)?

   Yes ✓ No ___

   List types of waste treatment units and processes:

Waste Code	Type of Treatment	Treatment Units and Processes
F001-F005	DISTILLATION	DISTILLATION UNIT
F001-F005	WASTEWATER TREATMENT	WASTEWATER TREATMENT UNIT

2. Are treatment residuals generated from these units?

   Yes ✓ No ___ Comments STILL BOTTOMS; TANK BOTTOMS

   If yes, the residues are subject to the LDR generator requirements.

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

   Yes ✓ No ___ NA ___ Comments PLACED IN ON-SITE SOLVENT RECOVERY PROCESS OR STORAGE PRIOR TO SHIPMENT OFF-SITE

   If yes, the TSD checklist must be completed.

FACILITY IS NOT A TRANSPORTER

RCRA LAND DISPOSAL RESTRICTION INSPECTION

TRANSPORTER CHECKLIST

TRANSPORTER REQUIREMENTS

A. Does the transporter accumulate waste for more than 10 days [268.50(a)(3)]?

Yes ___ No ___

If yes, check the appropriate regulatory status:

____ Interim status for storage
____ RCRA permit for storage

If no, describe inventory controls to ensure that wastes are not stored for more than 10 days:

_____

_____

_____

B. Does the transporter mix, combine, or recontainerize wastes?

Yes ___ No ____

If yes, list the restricted wastes that have been mixed.

_____

_____

_____

C. Is the waste treated in an exempt treatment process on-site?

Yes ___ No ___

RCRA LAND DISPOSAL RESTRICTION INSPECTION

TSD CHECKLIST

TSD REQUIREMENTS

A. General Facility Standards

1. Does the waste analysis plan cover Part 268 requirements [264/265.13]?

F-solvent (TCLP)*	Yes ✓	No ___	NA ___
Dioxin (TCLP)	Yes ___	No ___	NA ✓
California List (PFLT and/or total constituent analysis)*	Yes ✓	No ___	NA ___
First & Second Third (TCLP and/or total constituent analysis)	Yes ___	No ___	NA ✓

* TCLP= Toxicity Characteristic Leaching Procedure (268, App. I)
PFLT= Paint Filter Liquids Test (SW-846)

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

Yes ✓ No ___ Comments _____

a. What date was the waste analysis plan last revised?
DECEMBER 14, 1989

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

✓ On-site ___ Off-site

Identify off-site lab: _____

c. Are F-solvent and dioxin containing waste analyzed using TCLP?

Yes ___ No ✓ NA ___

d. Are California List wastes analyzed using the appropriate analytical method (PFLT filtrate for metals and cyanide; total constituent analysis for corrosive wastes, PCBs and halogenated organic compounds (HOCs).

Yes ✓ No ___ NA ___

e. Are First Third and Second Third wastes analyzed using the appropriate analytical method for the specified BDAT* (i.e., total constituent analysis for destruction technologies and TCLP for stabilization/fixation technologies)? See Appendix B.

Yes ___ No ___ NA ✓

* BDAT= best demonstrated available technology

3. Are the operating records, including analyses and quantities, complete [264/265.73]?

Yes ✓ No ___

4. Do operating records contain copies of the notification, certification, and demonstration (if applicable) from the generator? Records must be kept until closure of unit.

Yes ✓ No ___ Comments _____

B. Storage (268.50)

1. Are prohibited wastes* stored on-site?

Yes ✓ No ___ (If no, go to C, Treatment.)

* Prohibited wastes are a subset of restricted wastes, i.e., they are those restricted wastes that are currently ineligible for land disposal [53 FR 31208, August 17, 1988].

2. If yes, identify storage unit.

✓ Tanks
✓ Containers
___ Other (Identify inappropriate storage unit(s).

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

Yes ✓ No ___ NA ___

4. Do operating records track the location, quantity of the wastes, and dates that the wastes enter and leave storage (264/265.73)?

   Yes ✓ No ___

5. Do operating records agree with container labeling [268.50(a)(2) and 264/265.73]?

   Yes ✓ No ___ NA ___

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

   Yes ✓ No ___ NA ___

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

   Yes ✓ No ___

7. Are all tanks clearly marked with a description of the contents, the quantity of wastes received, and date(s) entering storage, or is such information recorded and maintained in the operating record [268.50(a)(2)]?

   Yes ✓ No ___ NA ___ INFORMATION IN OPERATING RECORD

8. Have wastes been stored for more than 1 year since the applicable LDR regulations went into effect [268.50(c)]?

   Yes ___ No ✓ NA ___

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

   Yes ___ No ___ NA ___

   If yes, state how: _____

9. Has liquid hazardous waste containing PCBs at concentrations greater than or equal to 50 ppm being stored:

   THESE WASTES NOT GENERATED

   a. In a facility meeting the TSCA criteria in 761.65(b)?

      Yes ___ No ___ NA ___

   b. More than one year [268.50(f)]?

      Yes ___ No ___ NA ___

C. Treatment

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

   Yes ✓ No ___ (If no, go to D, Surface Impoundments.)

2. Describe the waste codes and treatment processes:

Waste Code	Treatment Processes
F001-F005	DISTILLATION; FRACTIONATION; LIQUID-LIQUID EXTRACTION
↓	

3. Was dilution used as a substitute for treatment [268.3]?

   Yes ___ No ✓ Comments ___

4. Does the facility, in accordance with an acceptable waste analysis plan, test the residue from all treatment processes [268.7(b)]?

   Yes ✓ No ___ Comments ___

   Have treatment standards or prohibition levels been met?

   Yes ___ No ✓ Comments LDR WASTES ARE SENT OFF-SITE FOR TREATMENT

5. Does the facility ship any waste or treatment residue to an off-site disposal facility?

   Yes ___ No ✓ NA ___

   If yes, does the treatment facility provide notification and certification to the disposal facility [268.7(b)(4) and (5)]??

   Yes ___ No ___ (If yes, the Generator portion of the checklist must be completed.)

6. If the waste or treatment residue will be further managed at a different treatment or storage facility, has the facility complied with the generator notice and certification requirements [268.7(a)]?

   Yes ✓ No ___

7. Does the facility treat "soft hammer" wastes?

Yes ___ No ✓ (If no, go to 8.)

a. If yes, is the waste treated in accordance with the generator's certification/demonstration [268.8(c)(1)]?

Yes ___ No ___

b. Did the treatment facility certify that the "soft hammer" waste was treated in accordance with the generator's demonstration, [268.8(c)(1)]?

Yes ___ No ___

8. Does the facility ship any "soft hammer" waste to an off-site treatment, recovery, disposal or storage facility?

Yes ___ No ✓ NA ___

If yes, does the treatment facility send a copy of the generator's "soft hammer" demonstration and certification to the receiving treatment, recovery, disposal or storage facility along with its treatment certification [268.8(c)(2)]?

Yes ___ No ___ NA ___

Identify waste codes and off-site facilities:

Waste Code	Facility

9. Are notifications, demonstrations, certifications (if applicable), and results of waste analysis prepared by the generators, kept in the operating record until facility closure [264/265.73(b)]?

Yes ✓ No ___

D. Surface Impoundments

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

   Yes ___ No ✓ List _____ (If no, go to E, Land Disposal.)

2. Are evaporation or dilution the only recognizable treatment occurring in the surface impoundment?

   Yes ___ No ___

3. Did the facility submit to the Agency, the waste analysis plan, as well as, the certification of compliance with minimum technology and ground-water monitoring requirements?

   Yes ___ No ___

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

   Yes ___ No ___ NA ___

5. Have the Subpart F groundwater monitoring requirements been met?

   Yes ___ No ___ NA ___

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

   Yes ___ No ___

   Attach test results.

7. Do the hazardous waste residues (sludges or liquids) exceed the treatment standards specified in 40 CFR 268, or where no treatment standards are established for a waste, the applicable prohibition levels?

   Sludge Yes ___ No ___ Waste Code _____

   Supernatant Yes ___ No ___ Waste Code _____

8. Provide the frequency of analyses conducted on treatment residues:

   _____
   _____
   _____

9. Does the operating record adequately document the results of waste analyses performed in accordance with 40 CFR 268?

   Yes ___ No ___

10. Are sludge residues that exceed the treatment standards and/or prohibition levels removed adequately on an annual basis?

    Yes ___ No ___ Comments _____

    a. Are adequate precautions taken to protect liners, and do records indicate that liner integrity is inspected?

       Yes ___ No ___

    b. Are residues subsequently managed in another surface impoundment?

       Yes ___ No ___

    c. Are residues treated prior to disposal?

       Yes ___ No ___ Comments _____

       If yes, are waste residues treated on-site or off-site?

       On-site _____ Off-site _____

       Identify waste code and treatment method:

Waste Code	Treatment Method

11. If supernatant is determined to exceed treatment standards, is annual throughput greater than impoundment volume?

    Yes ___ No ___ Comments _____

6. Does the facility have notices [268.7(a)(3)] and records for disposed wastes that are subject to national capacity variances, case-by-case extensions [268.5], no migration petitions [268.6], or a variance from treatment standards?

   Yes ___ No ___ NA ___

7. If the facility has a case-by-case extension, is the facility making progress as described in progress reports?

   Yes ___ No ___ NA ___

8. Are restricted wastes placed in underground injection wells?

   Yes ___ No ___ List _____

E. Land Disposal

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

   Yes ___ No ✓

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

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

   _____

   _____

   _____

2. Does the facility's operating record contain notices, certifications, and "soft hammer" demonstrations from generators/storers/treaters? These records must be maintained until facility closure.

   Yes ___ No ___

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

   Yes ___ No ___

   If yes, at what frequency? _____

   _____

   _____

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

   Yes ___ No ___

5. Does the facility dispose of restricted wastes that are subject to a national capacity variance or the "soft hammer" provisions?

   Yes ___ No ___ Comments _____

   If yes, have the minimum technology requirements been met for all units receiving such wastes?

   Yes ___ No ___

STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY
INSPECTION REPORT

USEPA Number: ILD005450697 IEPA Number:: 0316000053

Facility Name: Safety Kleen Corp. Chgo RC (Safety-Kleen Corp.)

Street: 1445 W. 42nd Street
City: Chicago Telephone: 312/650-1467
County: Cook State: IL ZipCode: 60609

Type of Facility: Notified as: G, Tr, TSD, WAF, OSF Regulated as: G, S
LDF? No HPV? No 90 Day Follow-up required? Yes: ___ No: X

Region: 2 Date of Inspection: 7-25-89 From: 9:30am to: 12:15pm
Weather (LDF Only): ___

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

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

Notification date, 8-5-80, from (initial) or (subsequent) Notif.

Part A
Initial Part A date: 11-19-80 Ammended: 11-9-88
Part A Withdrawal requested: ___ Approved by (US)(IL)EPA: ___

Part B Permit Application
Part B Permit called by (US) (IL) EPA on: 5-6-88 Permit Due: 1-8-89
Part B Permit Submitted: 11-9-88 Draft Permit Issued: N/A

Enforcement
Has the firm been referred to: USEPA? No IAG? No County SA? No
Date(s) of initial referral: ___
USEPA CACO: ___ CAFO: ___ ALJ Decision: ___
Referral to DOJ by USEPA: ___ Federal Court Order Issued: ___
PCB Order Issued: ___ State Court Order Issued: ___

TSD Facility Activity Summary

Activity By Process Code	On Pt A?	Activity Conducted Prior to 1980?	Was Activity Ever Done?	Closed	Being Done at Time of Insp?	Exempt per 35 IAC, Sec.	On Annual Report 88	87	86
S01	Yes	Yes	Yes	No	Yes	N/A	No	Yes	Yes
S02	Yes	Yes	Yes	No	Yes	N/A	No	↓	↓
R03	N/A	Yes	Yes	N/A	Yes	721.106(c)(1) 725.101(c)(6)	Yes	↓	↓

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Operator: Safety-Kleen Corp. Telephone #: 312/650-1467

Street: 1445 W. 42nd St.

City: Chicago State: IL Zip Code: 60609

Owner: Safety-Kleen Corp. Telephone #: 312/697-8460

Street: 777 Big Timber Rd.

City: Elgin State: IL Zip Code: 60123

Person Interviewed	Title	Telephone #
Tom Hillstrom	Facility Manager	312/650-1467
Alfred Aghaiepour	Asst. Facility Manager	312/650-1467
Desi Chari	Regional Envir. Engineer	312/697-2460

Inspection Participants	Agency/Title	Telephone #
John Maher	IEPA/EPS	312/345-9780

Prepared By	Agency/Title	Telephone #
John Maher	IEPA/EPS	312/345-9780

Continuing Violation

Area	Class	Section
Other	1	725.293(a)

Summary of Apparent Violations

Area	Class	Section

Area	Class	Section

Safety-Kleen Corp.
0316000053
7/25/89

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NARRATIVE

Safety-Kleen Corp. Chicago Recycle Center reclaims spent solvent that they receive from off-site generators. The solvents include D001 and F001 through F005 wastes. The reclamation processes they employ include distillation, fractionation and liquid-liquid extraction. This site submitted their Part B application on 11/9/88. Since the application thoroughly describes this site's activities, providing a detailed description in this narrative would be redundant. Broadly described, this site has two lines of business: 1) reclaiming waste received on a toll basis and 2) reclaiming industrial solvent waste.

The toll business involves reclaiming solvent and returning the same material to the customer. The majority of these wastes are non-hazardous (e.g., lubricant oils). The industrial solvents (e.g., methylene chloride; trichloroethylene; 1,1,1 trichloroethane; perchloroethylene; freon; toluene; mineral spirits) are received from off-site generators and reclaimed, but they are not necessarily returned to the same generator (though the generator of these solvents may purchase reclaimed solvent from this site).

Secondary Containment of Tanks

This site has both new and existing tanks (as defined by 720.110). However, the new tanks do not contain hazardous waste and, therefore, are not subject to the secondary containment regulations. The existing tanks that contain hazardous waste are subject to the secondary containment

requirements. The secondary containment of the existing tanks is not in compliance with the requirements of 725.293; the concrete vault is not coated or lined with a chemical resistant material to prevent migration of waste into the concrete. In conformance with the Pre-enforcement Conference agreement that was made on 3 May 1989, this site is in the process of having the coating applied to the secondary containment (see photos). Safety-Kleen anticipates the completion of the coating within seven to ten days (around 1 August 1989), given acceptable weather for applying the material. (The recent heavy rains may hold up the project temporarily.)

HAZARDOUS WASTES GENERATED

Still Bottoms

- F001, F002, F003, F005.
- Generated from reclamation of spent solvent in the still.
- Rate generated: approx. 25,000 gallons/month. (The substantial rate increase since the 31 January 1989 inspection is primarily due to a new contract for the reclamation of THF-Toluene from one specific company.
- Sent to Safety-Kleen in Dolton, IL and Safety-Kleen in Clarksville, MO. These TSD sites use these still bottoms for fuel blending. However, if the toluene that is split from the THF-toluene is of high enough quality, these sites will reclaim it further. (Went shipped off-site, these wastes can be sent as F001, F002, F003, F005 or some combination of these.
- Last manifested: 24 July 1989.

- Last analyzed: Every shipment is analyzed.
- Currently 9,656 gallons on-site.

Misc. Drummed Waste

- F001, F002.
- Includes several wastes:
  1) drippings into buckets after removing a hose line,
  2) cleaning out tanks,
  3) used oil dry, and
  4) cutters - drums that have some solids in the bottoms and need to be cut open and scraped out.
- Rate generated: 5 - 10 drums/week of misc. drums. Approx. 90 drums/month of cutters alone.
- Pumpables are pumped into the tank containing the still bottoms that will go to Dolton Safety-Kleen for the fuels program. some of the waste goes to Deerpark, TX for incineration if it can't go through Dolton's grinding process. Cutter drums are sent to Dolton to be cut and scraped. They usually have only a small amount of waste in them.
- Last manifested: cutter - 22 June 1989.
- Last analyzed: every shipment is analyzed.
- Currently 67 drums of cutters and 40 drums of used oil dry on site.

Remanifested Waste

- F001, F002 (sometimes D001).
- Three types of wastes fall under this waste stream:

1) Waste received that is not intended to be reclaimed on-site; it is temporarily stored until it can be sent to the intended reclamation site (e.g., Dolton Safety-Kleen);
2) Safety-solvent that is received from off-site but is sent to Dolton Safety-Kleen for fractionation when this site's fractionator is too heavily occupied; and
3) Waste that is mistakenly sent to this site (but fits the description of waste that the site can accept under its permits).

- Rate generated: approx. 10,000 gallons/ month.
- Typically sent to Safety-Kleen sites in Dolton, IL and Hebron, OH.
- Last manifested: 6 July 1989.
- Last analyzed: every shipment is analyzed.

Waste Filters

- F001, F002, F003, F005.
- Generated from filtering waste as it is pumped into tanks.
- Rate generated: approx. 100 drums/year.
- Sent to Rollins (Deerpark, TX) for incineration. This is being handled as a hazardous waste, not as a non-hazardous waste as stated in the previous inspection report.
- Last manifested: 26 May 1989.
- Currently 25 drums on site.

NON-HAZARDOUS WASTES GENERATED

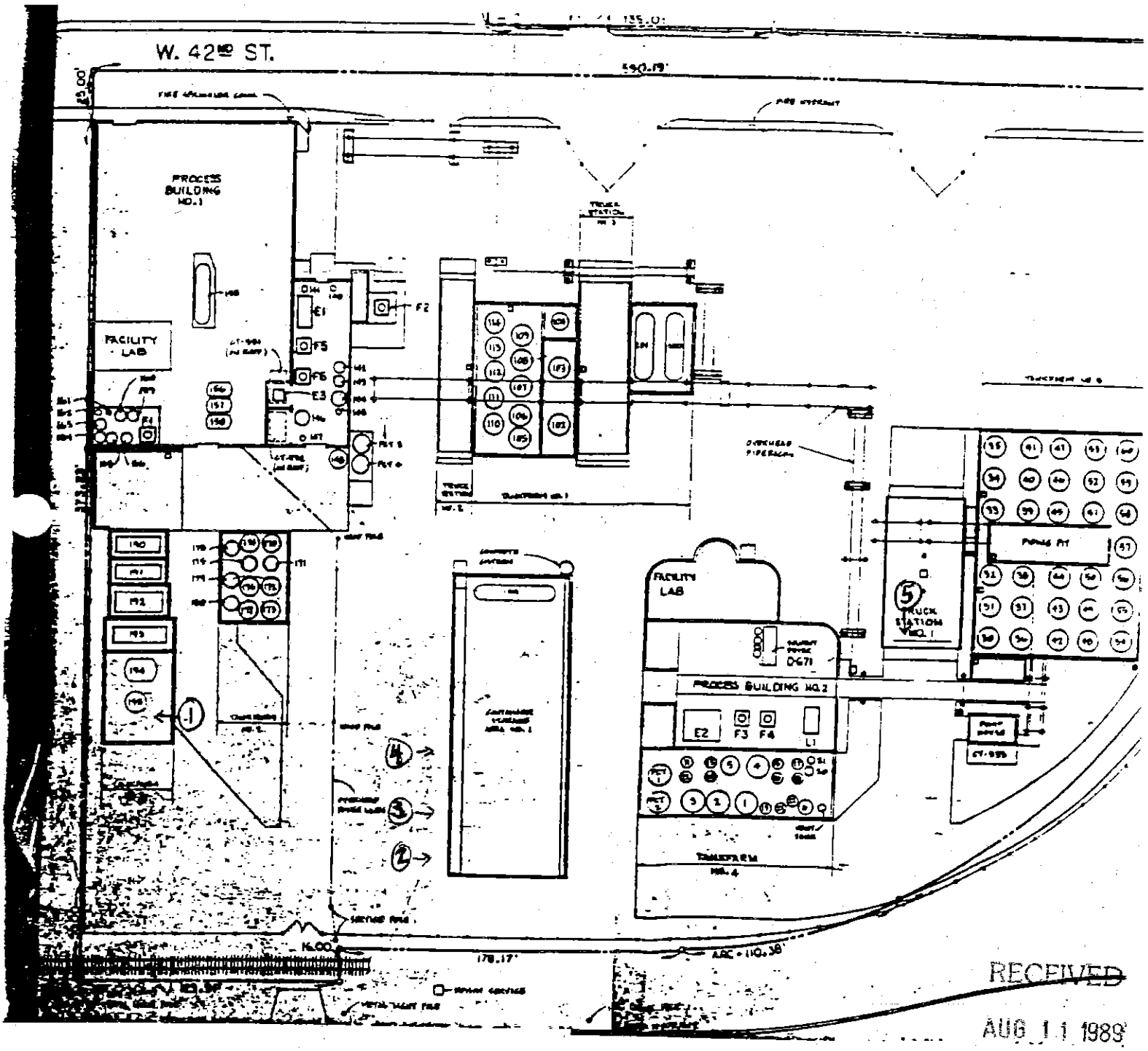
Non-hazardous Tank Bottoms

- Generated from cleaning the bottoms of non-hazardous tank bottoms.
- Rate generated: approx. 800 gallons/month.
- Mixed with hazardous waste, which makes this waste hazardous, and sent to Dolton Safety-Kleen for the fuels program.
- Currently non on site.

At the time of the inspection, the following apparent violation was observed:

725.293(a) - Failure to provide secondary containment by 12 January 1989 for existing hazardous waste storage tanks of unknown age.

(NOTE: Again, it should be stated that a Pre-enforcement Conference agreement between the site and IEPA should return this site to compliance by 1 September 1989. This return-to-compliance date is contingent on the acceptance of the site's Supplemental Permit application for storage of hazardous waste in tank farm no. 5.)



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SAFETY-KEEN CORP.
CHICAGO RECYCLE CENTER
EXISTING SITE PLAN
SCALE 1" = 75'

031600053

Date: 25 July 1989

Time: ~12:00 Noon

Photograph By:

John Maher

City: Chicago

IEPA #: 0316000053

Site Name:

Safety-Kleen Corp.

Comments: Coating on secondary containment. (Not yet finished)

Photo # 1 Roll #89-340

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Date: 25 July 1989

Time: ~12:00 Noon

Photograph By:

John Maher

City: Chicago

IEPA #: 0316000053

Site Name:

Safety-Kleen Corp.

Comments: Drum storage area.

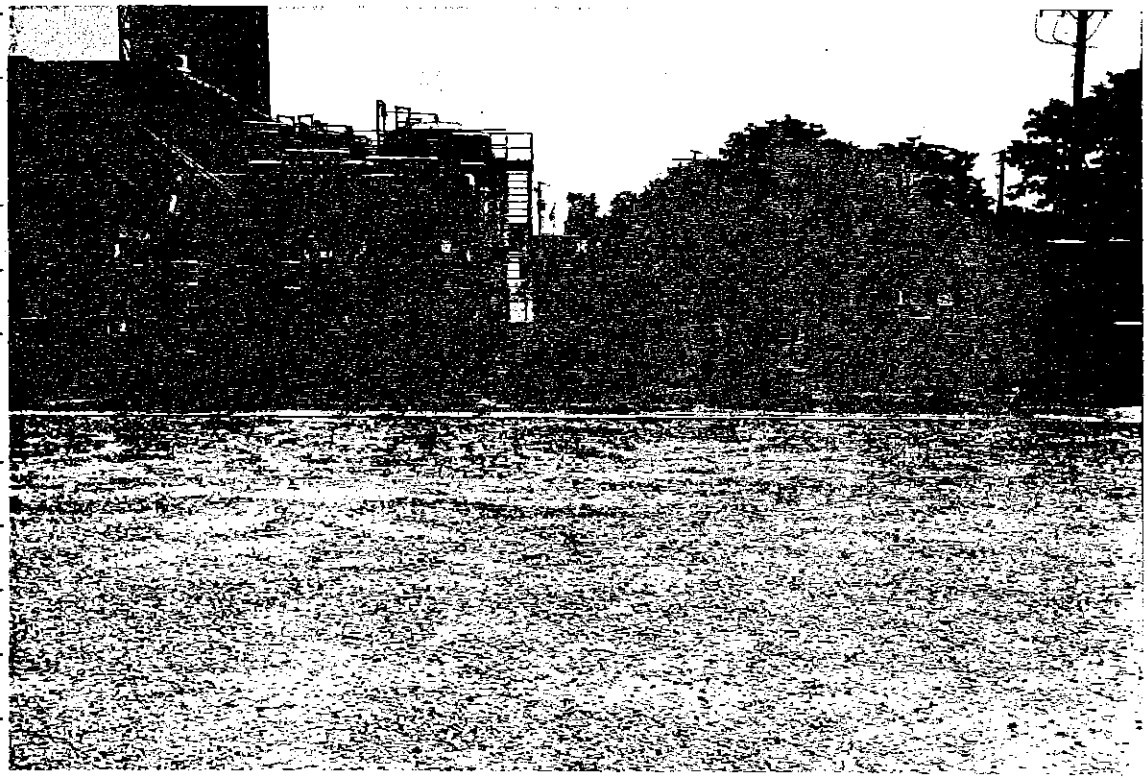


Photo # 2 Roll #89-340

ate: 25 July 1989

ime: ~12:00 Noon

hot raph By:

John Maher

ity: Chicago

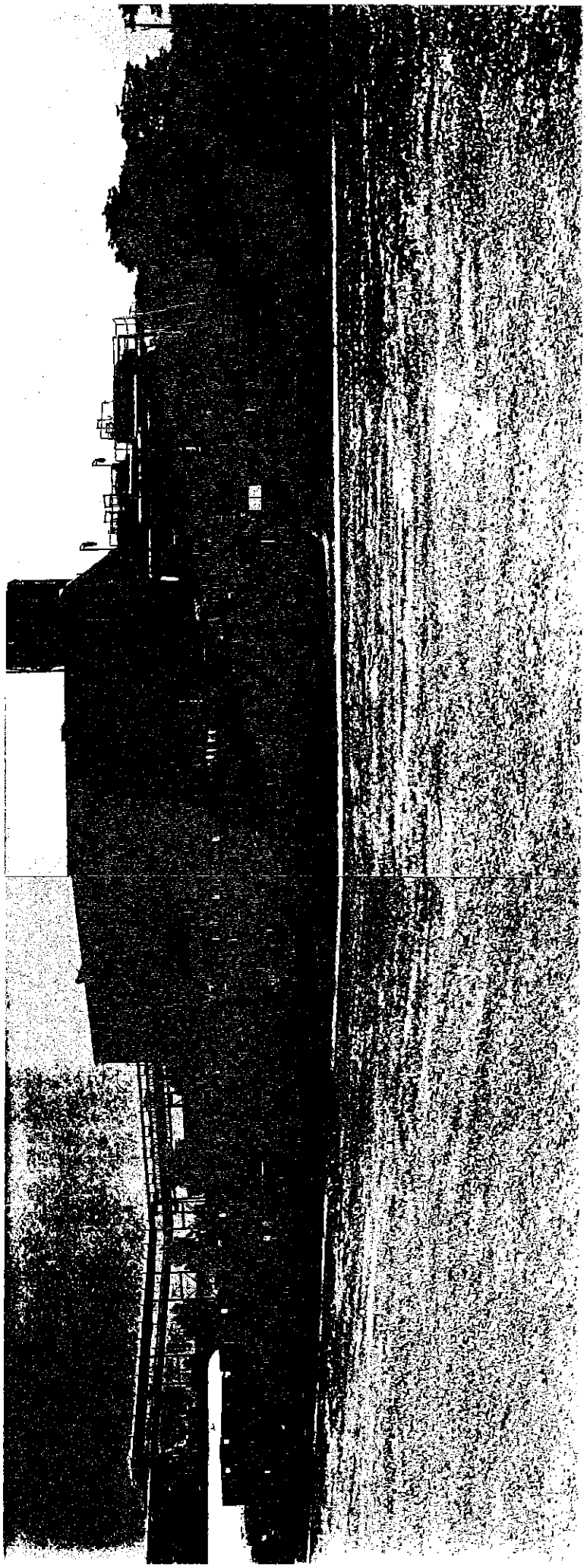
EPA #: 0316000053

ite Name:

Safety-Kleen Corp.

omments: Drum Storage area.

oto # 3 Roll #89-340



te: 25 July 1989

me: ~ 12:00 Noon

otograph By:

John Maher

ty: Chicago

PA #: 0316000053

te Name:

Safety-Kleen Corp.

mments: Drum Storage area.

oto # 4 Roll #89-340

Date: 25 July 1989

Time: ~12:00 Noon

Photograph By:

John Maher

City: Chicago

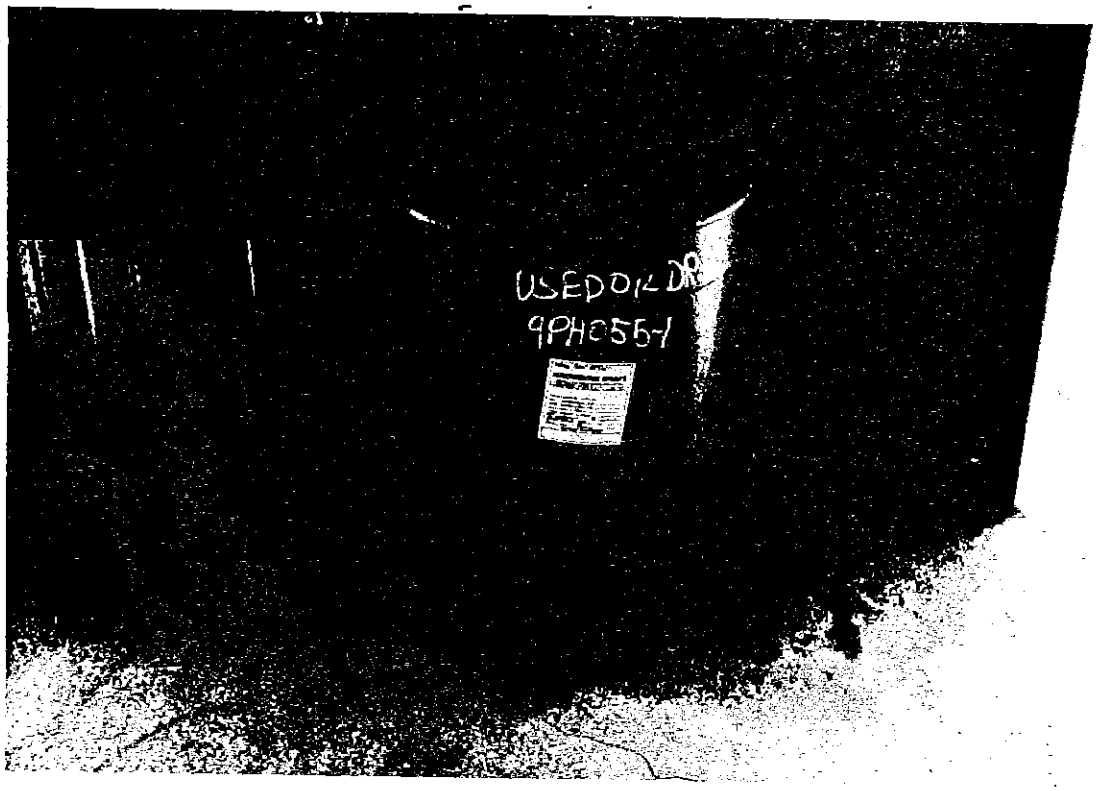
IEPA #: 0316000053

Site Name:

Safety-Kleen Corp.

Comments: Satellite accumulation of waste oil dry.

Photo # 5 Roll #89-340



~~Date: 25 July 1989~~

~~Time: ~ 12:00 Noon~~

~~Photograph By:~~

~~John Maher~~

~~City: Chicago~~

~~IEPA #: 0316000053~~

~~Site Name:~~

~~Safety-Kleen Corp.~~

~~Comments:~~

~~Photo # ____ Roll #89-340~~

Area	Class	Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No
OTH	1			**PART 703** **RCRA PERMIT PROGRAM** **Subpart C: Authorization by Rule and Interim Status** **Section 703.150: Application by Existing HWM Facilities and Interim Status Qualifications**	X			
			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 X 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 X 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 X				

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IL 532-1592
IDC 258 8/87

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
OTH	1			**Section 703.154: Prohibitions During Interim Status**	X			
				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 X No ___				
			b	- Employing processes not specified in Part A of the permit application? Yes X No ___				
			c	- Exceeding the design capacities specified in Part A of the permit application? Yes X No ___				
OTH	1			**Section 703.155: Changes During Interim Status**	X			
				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 X No ___ N/A ___				

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.
				PART 722 **GENERATOR STANDARDS** **Subpart A: General**				
OTH	1			**Section 722.111: Hazardous Waste Determination**	X			
				Has the generator determined if the solid waste it generates is a hazardous waste? Yes X No ___				
				Did the generator follow the procedures specified in this section in making its determination? Yes X No ___				
OTH	1			**Section 722.112: USEPA Identification Number**	X			
			a	Has the generator obtained a USEPA identification number? Yes X 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 X 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.
				PART 722 **GENERATOR STANDARDS** **Subpart B: The Manifest**				
MAN	2			**Section 722.120: General Requirements**	X			
			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 X 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 X 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 X				

IL 532-1592
PC 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.
MAN	2			**Section 722.121: Acquisition of Manifests**	X			
			a	Did the generator use the manifest supplied by the Agency for hazardous waste going for treatment, storage or disposal in Illinois? Yes X 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 X No ____ N/A ____				
MAN	2			**Section 722.122: Number of Copies**	X			
				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**	X			
				For each manifest received, has the generator: 1) Signed the certificate by hand? Yes X No ____ 2) Obtained the handwritten signature and the date of acceptance by the initial transporter? Yes X No ____				

IL 532-1592
IPC 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.
				3) Retained one copy as required by Section 722.140(a), Recordkeeping? Yes X No ___				
				4) Apparently sent a copy (Part 5 for Illinois manifests) to the Agency within two working days? Yes X 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 X 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 X				No bulk shipments
			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 X				

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**				
OTH	1	X		**Section 722.130: Packaging**	X			
				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**	X			
				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**	X			
			a	Is each package of hazardous waste which is ready for transportation off-site marked in accordance with 49 CFR Part 172? Yes X No ___				
			b	Is each package of hazardous waste which is ready for transportation off-site marked with: - The generator's name and address? Yes X No ___ - The manifest document number associated with the container? Yes X 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 X No ___				

TC 537-1507

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.**	X			
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.**	X			The only accumulation on site that is not storage is satellite accumulation of spent oil dry.
			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.**				

IL 532-1592
LPC 258 8/87

Area	Class	30 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 X No ___ N/A ___ - Complying with the requirements of: 1) 35 Ill. Adm. Code 725.271, Condition of Containers? Yes X No ___ 2) 35 Ill. Adm. Code 725.272, Compatibility of Waste with Containers? Yes X 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 X No ___ - Marking the containers with the words "Hazardous Waste" or with words that identify the contents of the containers? Yes X No ___				

IL 532-1592
LPC 250 8/87

Area	Class	30 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? N/A X 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 ____				N/A

IL 532-1592
LPC 258 8/87

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
				PART 722 **GENERATOR STANDARDS** **Subpart D: Recordkeeping and Reporting**				
OTH	2			**Section 722.140: Recordkeeping**	X			
				Has the generator retained for a period of three years:				
			a	- A copy of each signed manifest? Yes X No ___				
			b	- A copy of each annual report? Yes X No ___				
			b	- A copy of each exception report? Yes ___ No ___ N/A X				None required.
			c	- Copies of test results, waste analyses or other determinations made in accordance with Section 722.111? Yes X 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 X				
			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 X				

IL 532-1592
LPC 258 8/87

Area	Class	30 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**	X			
				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**			X	None required.
			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 532-1582
LPC 256 8/87

Area	Class	0 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?			X	None required.

IL 532-1592
LPC 256 6/87

Area	Class	30 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**			X	No exports
				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.**				

IL 532-1592
LPC 258 8/87

Area	Class	30 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**			X	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 ____				

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	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).**			X	No farming activity.

IL 532-1592
LPC 25n 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 A: General Provisions**				
OTH	1			**Section 725.101: Purpose, Scope and Applicability**	X			
				Does the facility qualify for any of the exemptions under Section 725.101(c)? Yes X No ___				Reclamation of recyclable materials.
				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 X				

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 B: General Facility Standards**				
OTH	1			**Section 725.111: USEPA Identification Number**	X			
				Has the facility obtained a USEPA identification number?				
OTH	1			**Section 725.112: Required Notices**	X			
			a	Has the owner or operator of a facility that has arranged to receive hazardous waste from a foreign source notified the Regional Administrator, in writing, at least four weeks in advance of the date that the waste is expected to arrive at the facility? Yes ____ No ____ N/A X				
			b	Before transferring ownership or operation of a facility during its operating life, or of a disposal facility during the post-closure care period, did the owner or operator notify the new owner or operator, in writing, of the requirements of 35 Ill. Adm. Code 703, 703 and 725? Yes X No ____ N/A ____				
OTH	1			**Section 725.113: General Waste Analysis**	X			
			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 X 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.
			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 X 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 X 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 X 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 X No ____ N/A ____				
			b	Has the owner or operator developed a written analysis plan? Yes X No ____ **NOTE: If "No", skip to 725.114.** Is the written waste analysis plan available at the facility? Yes X No ____				

JL 532-1592
1PM: 250 8/87

Area	Class	30 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 X 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 X No ___				
				2) The test methods which will be used to test for those parameters? Yes X No ___				
				3) The sampling method which will be used to obtain a representative sample of the waste to be analyzed? Yes X 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 X No ___				
				5) For off-site facilities, the waste analyses that hazardous waste generators have agreed to supply? Yes ___ No ___ N/A X				They perform analyses for their customers.

IL 532-1502
LPC 256 6/87

Area	Class	30 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 X **NOTE: Circle the specific waste management methods being employed.**				No significantly different wastes being stored in tanks.
			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 X 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 X 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 X	X			

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.
				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 X 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 X 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 X 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 250 8/87

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
OTH	2	,		**Section 725.115: General Inspection Requirements**	X			
			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 X 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 X 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 X No ___				
			b2	Is the written schedule at the facility? Yes X No ___				
			b3	Does the schedule identify the types of problems which are to be looked for during the inspection? Yes X No ___				
			b4	Does the schedule specify at least the following minimum inspection frequency: - Daily inspections of areas subject to spills? Yes X No ___				

IL 532-1502
LPC 250 8/87

Area	Class	30 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 X 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 X 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 X				No hazards have occurred.
			d	Does the owner or operator record the results of inspections in a log or summary? Yes X No ___				
			d	Does the inspection record include: - The date and time of the inspection? Yes X No ___ - The name of the inspector? Yes X No ___				

IL 532-1592
LPC 258 8/87

Area	Class	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 X No ____				
				- The date and nature of any type of corrective action? Yes X No ____ N/A ____				
OTH	2			**Section 725.116: Personnel Training**	X			
				Does the facility have a training program? Yes X 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 X No ____				
				Is the training program formalized, i.e., written down? Yes X No ____				
			a2	Is the program directed by a person who has been trained in hazardous waste management procedures? Yes X No ____				
			a3	Does the program cover, at a minimum:				
				A) Procedures for using, inspecting, repairing and replacing facility emergency and monitoring equipment? Yes X 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.
				B) Key parameters for automatic waste feed cutoff systems? Yes ___ No ___ N/A X				No automatic waste feed systems.
				C) Communications or alarm systems? Yes X No ___ N/A ___				
				D) Response to fire or explosion? Yes X No ___ N/A ___				
				E) Response to ground water contamination incidents? Yes ___ No ___ N/A X				Not an LDF.
				Does the program cover the implementation of the contingency plan? Yes X 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 X No ___ N/A ___				
			c	Has the facility conducted an annual review of the initial training? Yes X 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 X No ___				

IL 532-1502
LPC 256 8/87

Area	Class	30 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 X 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 X 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 X 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 X No ____ N/A ____				
OTH	1	X		**Section 725.117: General Requirements for Ignitable, Reactive or Incompatible Wastes**	X			
			a	Are ignitable and reactive wastes protected from and separated from sources of ignition and reaction? Yes X No ____				
			a	Are smoking and open flames restricted to specially designated areas when ignitable or reactive waste is being handled? Yes X No ____				

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.
			a	Are "No Smoking" signs posted whenever there is a hazard from ignitable or reactive waste? Yes X 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 X No ____ 2) Produce uncontrolled toxic mists, fumes, dusts or gases in sufficient quantities to threaten human health? Yes X No ____ 3) Produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosion? Yes X No ____ 4) Damage the structural integrity of the device or facility containing the waste? Yes X No ____ 5) Through other like means threaten human health or the environment? Yes X 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.
				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.**			X	

IL 532-1502
LPC 256 8/87

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
				PART 725 **INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES** **Subpart C: Preparedness and Prevention**				
OTH	1	X		**Section 725.131: Maintenance and Operation of Facility**	X			
				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 X No ____				
OTH	1	X		**Section 725.132: Required Equipment**	X			
				Is the facility equipped with the following, unless none of the hazards posed by waste handled at the facility could require a particular kind of equipment:				
			a	- An internal communications or alarm system capable of providing immediate emergency instructions? Yes X 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 X No ____ N/A ____				

IL 532-1502
LPC 258 8/87

Area	Class	30 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 X 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 X 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 X No ____ N/A ____ - Fire protection equipment? Yes X No ____ N/A ____ - Spill control equipment? Yes X No ____ N/A ____ - Decontamination equipment? Yes X No ____ N/A ____ **NOTE: Any "N/A" answer must be explained in the Comments.**	X			

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	X		**Section 725.134: Access to Communications or Alarm Systems**	X			
			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 X 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 X				Never just one employee on premises.
OTH	1	X		**Section 725.135: Required Aisle Space**	X			
				Is the owner or operator maintaining sufficient aisle space to allow the unobstructed movement of personnel, fire equipment and decontamination equipment to any area of the facility?				
OTH	2			**Section 725.137: Arrangements with Local Authorities**	X			
			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 532-1592
(PC 256 R/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 X 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 X				Chicago Fire and Police Depts will respond.
				3) Agreements with State emergency response teams, emergency response contractors and equipment suppliers? Yes ____ No ____ N/A X				Site can handle spills.
				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 X 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 X				

IL 532-1502
LPC 256 8/87

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
				PART 725 **INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES** **Subpart D: Contingency Plan and Emergency Procedures**				
OTH	1			**Section 725.151: Purpose and Implementation of Contingency Plan**	X			
			a	Is a plan available? Yes X 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 X 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 X				
OTH	2			**Section 725.152: Content of Contingency Plan**	X			
			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 X No ___ 2) Explosions? Yes X No ___				

IL 532-1592
LPC 256 8/87

Area	Class	30 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 X No ___				
			c	Does the plan describe the arrangements agreed to by:				
				1) Local police and fire departments? Yes X No ___				
				2) Hospitals? Yes X No ___				
				3) Contractors? Yes ___ No ___ N/A X				Site can handle spills.
				4) State and local emergency response teams? Yes X 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 X No ___				
			d	Is the list of emergency coordinators up-to-date? Yes X No ___				
			d	If more than one person is designated as an emergency coordinator is a primary coordinator designated? Yes X No ___				
			e	Does the plan identify:				
				1) A list and physical description of all emergency equipment at the facility? Yes X No ___				

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.
				2) A brief outline of the capability of each piece of emergency equipment? Yes X No ____				
				3) The location of each piece of emergency equipment? Yes X No ____				
			e	Is the list of emergency equipment up-to-date? Yes X No ____				
			f	Does the plan include an evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? Yes X No ____ N/A ____				
			f	Does the plan identify the signal to be used to begin evacuation? Yes X No ____				
			f	Are alternate evacuation routes identified? Yes X No ____				
OTH	2			**Section 725.153: Copies of Contingency Plan**	X			
			a	Has a copy (and all revisions) of the contingency plan:				
				a) Been maintained at the facility? Yes X 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 X No ____				

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.
OTH	2			**725.154: Amendment of Contingency Plan**	X			
				Has the contingency plan been reviewed and, if necessary, amended whenever:				
			a	1) Applicable regulations are revised? Yes ____ No ____ N/A X				
			b	2) The plan fails in an emergency? Yes ____ No ____ N/A X				
			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 X				
			d	4) The list of emergency coordinators changes? Yes X No ____				
			e	5) The list of emergency equipment changes? Yes X No ____				
OTH	2			**Section 725.155: Emergency Coordinator**	X			
				Is there an emergency coordinator on-site or on-call at all times? Yes X 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.
OTH	1/2			Is there an emergency coordinator familiar with all aspects of the contingency plan, all operations and activities at the facility, the location and characteristics of the wastes handled, the location of all records in the facility and the facility layout? Yes X No ____ Does the coordinator have the authority to commit the resources to carry out the contingency plan? Yes X No ____ **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.**			X	

IL 532-1592
LPC 256 6/87

Area	Class	30 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**	X			
				Does the facility accept waste from off-site? Yes X No ____				
				NOTE: If the answer is "Yes", complete this section. If the answer is "No", check "N/A" 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 X No ____				
			a2	2) Note any significant discrepancies in the manifest or each copy of the manifest? Yes X No ____ N/A ____				
			a3	3) Immediately give one copy of the completed manifest to the transporter? Yes X No ____				
			a4	4) Within 30 days after delivery, send one copy of the manifest to the generator and one copy to the Agency? Yes X 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 X No ____				

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.
			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 X				No bulk shipments.
				Does the facility initiate shipments of hazardous waste? Yes X 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**	X			
				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 X 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 ___ N/A X				Discrepancy is either resolved or load is rejected.

IL 532-1502

Area	Class	30 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**	X			
			a	Does the owner or operator have a written operating record at the facility? Yes X No ___				
			b	Is the information in the operating record being maintained until closure of the facility? Yes X 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 X No ___ 2) A record of the method(s) and date(s) of its treatment, storage, or disposal as required by Appendix I? Yes X No ___ 3) The location of each hazardous waste within the facility? Yes X No ___ 4) The quantity of each hazardous waste at each location within the facility? Yes X 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 X				

IL 532-1592
LPC 256 8/87

Area	Class	30 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 X No ____ N/A ____				
				7) Records and results of waste analyses and trial test performed as specified in Sections: - 725.113 (Gen. Waste Analysis)? Yes X No ____ - 725.293 (Tanks)? Yes ____ No ____ N/A X - 725.325 (Surface Improvements)? Yes ____ No ____ N/A X - 725.352 (Waste Piles)? Yes ____ No ____ N/A X - 725.373 (Land Treatment)? Yes ____ No ____ N/A X - 725.441 (Incinerators)? Yes ____ No ____ N/A X - 725.475 (Thermal Treatment)? Yes ____ No ____ N/A X - 725.502 (Chem., Phys., Bio. Treatment)? Yes ____ No ____ N/A X				No significantly different wastes being stored in tanks.
				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 X				

IL 532-1502
LPC 258 6/87

Area	Class	0 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 X 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 X - 725.194 (G.W. Monitoring)? Yes ____ No ____ N/A X - 725.376 (Land Treatment)? Yes ____ No ____ N/A X - 725.378 (Land Treatment)? Yes ____ No ____ N/A X - 735.380(d)(1) (Land Treatment)? Yes ____ No ____ N/A X - 725.447 (Incinerators)? Yes ____ No ____ N/A X - 725.477 (Thermal Treatment)? Yes ____ No ____ N/A X **NOTE: Data required under 725.194 must be kept throughout the post-closure period.**				

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 X No ___ N/A ___				
				12) All post-closure cost estimates for disposal facilities required for Section 725.244? Yes ___ No ___ N/A X				Not an LDF.
OTH	2			**Section 725.174: Availability, Retention and Disposition of Records**	X			
			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 X No ___ N/A ___				
			c	Upon closure of a waste disposal facility did the owner or operator submit a copy of the record of waste disposal location(s) and quantities to:				
				- The Agency? Yes ___ No ___ N/A X				
				- The local land authority? Yes ___ No ___ N/A X				
			b	Are all required records being maintained and retained during the course of any unresolved enforcement action or as requested by the Director? Yes ___ No ___ N/A X				

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 725.175: 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?	X			
OTH	1			**Section 725.176: Unmanifested Waste Report** Does the facility accept hazardous waste from off-site? Yes ____ No ____ **NOTE: If the answer is "Yes", complete this section. If the answer is "No", check "N/A" and skip to 725.177.** Has the facility accepted hazardous waste from an off-site source for treatment, storage or disposal without an accompanying manifest or shipping paper? Yes ____ No ____ Was the hazardous waste accepted without the manifest or shipping paper exempt from the manifesting requirement by 35 Ill. Adm. Code 721.105? Yes ____ No ____ **NOTE: If the answer to both the above questions is "Yes", check "N/A". If the answer to the first question is "Yes" and the second "No", answer the following questions:** Did the owner or operator complete an unmanifested waste report to include the information required in Section 725.176(a) thru (g)? Yes ____ No ____			X	Unmanifested waste is not accepted.

IL 532-1502

Area	Class	30 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
OTH	2			Did the owner or operator submit the unmanifested waste report to the Agency within 15 days of receiving the waste? Yes ____ No ____			X	
				Section 725.177: Additional Reports				
				Has the owner or operator submitted to the Agency, as required, reports concerning:				
			a	1) Releases, fires, explosions as specified in Section 725.156? Yes ____ No ____ N/A X				
			b	2) Groundwater contamination and monitoring data as specified in Sections 725.193 and 725.194? Yes ____ No ____ N/A X				
			c	3) Facility closure as specified in Section 725.215? Yes ____ No ____ N/A X				

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.
				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**	X			
			a	Was the most current facility closure plan available during the inspection? Yes X 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 X				
				- 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 X				
				- 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 X No ____ N/A ____				Submitted with Part B 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 X				

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.
				- No later than 15 days after termination of interim status (unless a full operating permit was issued simultaneously)? Yes ____ No ____ N/A X				
				- 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 X				
CLO	1			**Section 725.218: Post-Closure Plan**			X	Not an LDF.
			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**	X			
				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**			X	Not on LDF.
				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 258 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.
				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**	X			
				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**	X			
				Is the owner or operator using containers made of or lined with materials which will not react with and are otherwise compatible with the hazardous waste to be stored so that the ability of the container to contain the waste is not impaired?				
OTH	1	X		**Section 725.273: Management of Containers**	X			
			a	Are containers of hazardous waste always closed during storage? Yes X 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 X No ___				
OTH	2			**Section 725.274: Inspections**	X			
				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 X No ___				

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.
				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?	X			
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?			X	No incompatible wastes.

IL 532-1592
LPC 256 8/87

Area	Class	30 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 X 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 ___ N/A X				
				NOTE: Failing the filter test means that the waste contains free liquids.				
OTH	2			**Section 725.291: Assessment of Existing Tank Systems**	X			
			a	For tanks not protected by a secondary containment system, is an independent, certified written assessment available? Yes X No ___				
				NOTE: Except as provided in Subsection (c) of 725.291, certified assessment must be available by 1/12/88.				

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.
			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 X No ___				
OTH	1			**Section 725.292: Design and Installation of New Tank Systems or Components**	X			New tanks are not yet being used to store hazardous waste.
			a	For new tanks (built after July 14, 1986) was an independent, certified written assessment prepared? Yes X 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 X No ___				

IL 532-1592
LPC 258 8/87

Area	Class	0 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 X No ___				
OTH				**Section 725.293: Containment and Detection of Releases**		X		
			a1	Is secondary containment provided for any new tank system (constructed after 7/14/86) before being put into service? Yes ___ No ___ N/A X				There are no new tanks storing hazardous waste.
			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 X				
			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 X				
			a4	For an existing tank of unknown age, has secondary containment been provided by January 12, 1995? Yes ___ No ___ N/A X				
				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 X N/A ___				Not in compliance with the design requirements.
			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 X				

IL 532-1592
LPA 25n 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.
			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 X 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).**				Secondary containment does not have the required coating yet.
			c4	Is spilled or leaked wastes and accumulated precipitation removed from the secondary containment within 24 hours? Yes X 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 X 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 532-1592
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.
	-	'		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 X 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 X				
				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 X				
				3) Are written records maintained at the facility to document the assessments required under Subsections (i)(1) and (2)? Yes ____ No ____ N/A X				

TL 532-1592

Area	Class	30 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**	X			
			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 X 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 X				
			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 X				
OTH	2			**Section 725.295: Inspections**	X			
			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 X No ___				
OTH	1	X		**Section 725.296: Response to Leaks or Spills and Disposition of Tank Systems**			X	No 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 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.
				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 250 8/87

Area	Class	30 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**			X	No closures yet.
				NOTE: The requirements of this section apply to closure of tank systems. If no closure is being performed, then skip to Section 725.298.				
			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 ____				
			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 532-1592
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			**Section 725.298: Special Requirements for Ignitable or Reactive Wastes**	X			
				Are ignitable or reactive wastes stored in tanks? Yes X 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 X 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 X No ___				
OTH	1			**Section 725.299: Special Requirements for Incompatible Wastes**			X	
				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 X				

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**			X	No substantially different wastes 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 258 9/87

RCRA LAND DISPOSAL RESTRICTION INSPECTION

Facility: Safety Kleen Corp. Chgo RC (Safety-Kleen Corp.)

U.S. EPA I.D. No.: ILD 005450697

Street: 1445 W. 42nd Street

City: Chicago State: IL Zip Code: 60609

Telephone: 312/247-2828

Operator: Safety-Kleen Corp.

Street: 1445 W. 42nd Street

City: Chicago State: IL Zip Code: 60609

Telephone: 312/247-2828

Owner: Safety-Kleen Corp.

Street: 777 Big Timber Rd.

City: Elgin State: IL Zip Code: 60123

Telephone: 312/697-8460

Inspection Date: 1/31/89 Time: 10:00 AM-4:30 pm Weather Conditions:

	Name	Affiliation	Telephone
Inspectors:	John Maher	IEPA/DLPC	312/345-9780

Facility Representatives: Tom Hillstrom 312/247-2828

Alfred Aghaiepour 312/247-2828

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

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MAR - 2 1989

IEPA/DLPC

Revised 9-26-88

IL 532-1739
LPC 296 11/88

INSPECTION SUMMARY

Safety-Kleen Corp. reclaims spent solvent that is received from off-site generators. They employ several processes: distillation, fractionation and liquid-liquid extraction. As a result of their activities, they are also generators of hazardous waste (still bottoms from recovering the solvent).

At the time of the inspection, the following apparent violation was observed:

- Containers of restricted solvent (i.e., F001 - F005) were being stored without having the storage start date marked on them.

Though this violation was observed, they corrected it during the inspection by placing the dates on the containers. I returned to the drum storage area and observed the dated containers. (They used their operating record to determine what the storage start date was for each container.)

With the exception of the above violation, the site was operating in general compliance with the generator and storage facility regulations.

RCRA LAND DISPOSAL RESTRICTION INSPECTION

GENERATOR CHECKLIST

GENERATOR REQUIREMENTS

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

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

   X Yes ____ No ____ NA

   If yes, check the appropriate treatability group.

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

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

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

      ____ Yes ____ No X NA

      If yes, specify the method: _____

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

      ____ Yes ____ No X NA

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

      _____
      _____
      _____

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

____ Yes ____ No X NA

If yes, check the appropriate treatability group.

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

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

Waste Code	Wastewater	Nonwastewater

B. **Waste Analysis**

1. F-Solvent Wastes

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

X Yes ____ No ____ NA

How was this determination made?

- Knowledge of waste

X Yes ____ No

If yes, is any supporting data available for review? Describe how this is adequate. Waste is spent solvent still bottoms.

- TCLP

____ Yes X No

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

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

X Yes ____ No ____ NA

If yes, specify the waste stream: Spent solvent still bottoms.

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

____ Yes ____ No X NA

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

On-site Gas Chromatograph.

2. California List Wastes

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

____ Yes ____ No X NA Waste is clearly a liquid.

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

____ Yes ____ No X NA

What type of absorbent is used? ____

Check the types of waste to which absorbent is added.

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

____ Liquid hazardous waste containing metals

____ Liquid hazardous waste containing free cyanides

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

- Knowledge of wastes

X Yes ____ No ____ NA

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

- Testing

____ Yes ____ No X NA

If yes, list test method used: _____

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

____ Yes ____ No X NA

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

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

____ Yes ____ No X NA

3. First Third Wastes: N/A X

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

____ Yes ____ No X NA

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

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

____ Yes ____ No ____ Soft hammer

If yes, specify the waste stream: _____

How was this determination made?

- Knowledge of waste

____ Yes ____ No

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

- TCLP

____ Yes ____ No ____ NA

- Total Constituent Analysis

____ Yes ____ No ____ NA

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

_____

_____

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

____ Yes ____ No ____ NA

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

_____

_____

_____

C. Management

1. On-Site Management

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

X Yes ____ No

If yes, the TSD Checklist must be completed.

2. Off-Site Management

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

X Yes ____ No

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

X Yes ____ No

c. Does notification contain the following?

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

Identify off-site treatment or storage facilities: _____

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

____ Yes X No

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

____ Yes ____ No

f. Does notification contain the following?

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

Identify off-site land disposal facilities: _____

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

____ Yes ____ No X NA

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

____ Yes ____ No

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

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

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

____ Yes ____ No

D. **Demonstration and Certification -- "Soft Hammer" Wastes** No "Soft Hammer" wastes.

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

____ Yes ____ No

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

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

Attach a copy of the demonstration and certification

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

____ Yes ____ No

If yes, attach a copy of written discussion.

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

____ Yes ____ No

Describe the type of treatment and treatment facilities _____

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

____ Yes ____ No

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

____ Yes ____ No

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

(i) EPA Hazardous waste number ____ Yes ____ No

(ii) Manifest number ____ Yes ____ No

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

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

____ Yes ____ No

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

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

X Yes ____ No

If yes, list types of waste treatment units and processes:
Still, liquid-liquid extraction, fractionation

RCRA LAND DISPOSAL RESTRICTION INSPECTION

TSD CHECKLIST

TSD REQUIREMENTS

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

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

   o F-solvent ___X___ Yes ____ No ____ NA

   o California List ___X___ Yes Halogenated Solvents ____ No ____ NA

   o First Third ____ Yes ____ No ___X___ NA

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

   ___X___ Yes ____ No

   a. What date was the waste analysis plan last revised? 11-4-88

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

   ___X___ On-site ____ Off-site

   Identify off-site lab: _____

   c. Is F-solvent waste analyzed using TCLP?

   ____ Yes ____ No ___X___ NA

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

   ____ Yes ____ No ___X___ NA

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

   e. Describe the frequency of sampling: Every shipment

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

X Yes ____ No

B. **Storage** (268.50)

1. Are restricted wastes stored on-site?

X Yes ____ No

If no, go to C, Treatment.

2. If yes, check the appropriate method.

X Tanks
X Containers

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

____ Yes X No ____ NA

However, this was corrected at the time of the inspection.

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

X Yes ____ No

5. Do operating records agree with container labeling?

X Yes ____ No ____ NA

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

X Yes ____ No

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

____ Yes ___X___ No ____ NA

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

____ Yes ____ No

If yes, state how: _____

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

___X___ Yes ____ No ____ NA

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

___X___ Yes ____ No

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

___X___ Yes ____ No ____ NA

Information is detailed in the operating record.

C. **Treatment**

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

___X___ Yes ____ No

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

2. Describe the treatment processes:
Distillation, fractionation, liquid-liquid extraction.

3. Does the facility, in accordance with an acceptable waste analysis plan, determine whether the residue or residue extract (for treatment standards expressed as concentrations in the waste extract) from all treatment processes is less than treatment standards [268.7(b)]?

X Yes ____ No

4. Is dilution used as a substitute for treatment?

____ Yes X No

6. Are notifications, demonstration, and certification (if applicable) prepared by the generators kept in the facility's operating record?

X Yes ____ No

7. Does the facility ship any waste or treatment residue that meets the treatment standards to an off-site disposal facility?

____ Yes X No ____ NA

If yes, does the treatment facility provide notification and certification to the disposal facility?

____ Yes ____ No

If yes, does notification contain the following?

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

Identify off-site disposal facilities: _____

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

____ Yes ____ No X NA

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

____ Yes ____ No

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

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

____ Yes X No

If no, go to E, Land Disposal.

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

____ Yes ____ No

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

____ Yes ____ No ____ NA

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

____ Yes ____ No

Attach test results.

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

____ Yes ____ No

6. Provide the frequency of analyses conducted on treatment residues: _____

_____

_____

7. Does the operating record adequately document the results of waste analyses performed in accordance with 268.41?

_____ Yes _____ No

8. Do the hazardous waste residues exceed the treatment standards (268.41) or do not meet the prohibition levels?

Sludge _____ Yes _____ No

Supernatant _____ Yes _____ No

a. If yes, are sludge and supernatant removed adequately on an annual basis?

_____ Yes _____ No

b. Are adequate precautions taken to protect liners, and do records indicate that liner integrity is inspected?

_____ Yes _____ No

c. Are residues subsequently managed in another surface impoundment?

_____ Yes _____ No

d. Are residues treated prior to disposal?

_____ Yes _____ No

If yes, are waste residues treated on-site or off-site?

_____ On-site _____ Off-site

Identify treatment method: _____

_____

_____

E. **Land Disposal**

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

   ____ Yes X No

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

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

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

   ____ Yes ____ No

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

   ____ Yes ____ No

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

   ____ Yes ____ No

   If yes, at what frequency? _____

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

   ____ Yes ____ No

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

   ____ Yes ____ No

7. Does the facility have notices [268.7(a)(3)] and records of disposal for disposed wastes that are subject to a national capacity variance, case-by-case extensions [268.5], or no migration petitions [268.6]?

____ Yes ____ No ____ NA

8. What is the volume of the restricted wastes disposed of to date?

_____

_____

9. If the facility has a case-by-case extension, is the facility making progress as described in progress reports?

____ Yes ____ No ____ NA

STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY
INSPECTION REPORT

USEPA Number: ILD005450697 IEPA Number:: 0316000053

Facility Name: Safety Kleen Corp Chgo RC (Safety-Kleen Corp)

Street: 1445 W. 42nd Street
City: Chicago Telephone: 312/247-2828
County: Cook State: IL ZipCode: 60609

Type of Facility: Notified as: G, Tr, TSD, WAF, OSF Regulated as: G, S
LDF? No HPV? No 90 Day Follow-up required? Yes: ___ No: X

Region: 2 Date of Inspection: 1-31-89 From: 10:00 AM to: 4:30PM
Weather (LDF Only): ___

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

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

Notification date, 8-5-80, from (initial) or (subsequent) Notif.

Part A
Initial Part A date: 11-19-80 Ammended: 11-9-88
Part A Withdrawal requested: ___ Approved by (US)(IL)EPA: ___

Part B Permit Application
Part B Permit called by (US) (IL) EPA on: 5-6-88 Permit Due: 1-8-89
Part B Permit Submitted: 11-9-88 Draft Permit Issued: N/A

Enforcement
Has the firm been referred to: USEPA? No IAG? No County SA? No
Date(s) of initial referral: ___ ___ ___
USEPA CACO: ___ CAFO: ___ ALJ Decision: ___
Referral to DOJ by USEPA: ___ Federal Court Order Issued: ___
PCB Order Issued: ___ State Court Order Issued: ___

TSD Facility Activity Summary

Activity By Process Code	On Pt A?	Activity Conducted Prior to 1980?	Was Activity Ever Done?	Closed	Being Done at Time of Insp?	Exempt per 35 IAC, Sec.	On Annual Report 87	86	85
S01	YES	YES	YES	No	YES	N/A	Y	Y	N
S02	YES	YES	YES	No	YES	N/A	Y	Y	N
T04	No	YES	YES	N/A	YES	725.101(c)	N	N	Y

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Operator: Safety-Kleen Corp. Telephone #: 312/247-2828

Street: 1445 W. 42nd St.

City: Chicago State: IL Zip Code: 60609

Owner: Safety-Kleen Corp Telephone #: 312/697-8460

Street: 777 Big Timber Rd.

City: Elgin State: IL Zip Code: 60123

Person Interviewed	Title	Telephone #
Tom Hillstrom	Facility Manager	312/247-2828
Alfred Aghaiepour	Asst. Facility Manager	312/247-2828

Inspection Participants	Agency/Title	Telephone #
John Maher	IEPA/EPS	312/345-9780

Prepared By	Agency/Title	Telephone #
John Maher	IEPA/EPS	312/345-9780

Summary of Apparent Violations

Area	Class	Section
OTH	I	725.293(a)

Area	Class	Section

Area	Class	Section

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Safety-Kleen Corp.
0316000053
1/31/89

NARRATIVE

Safety-Kleen Corp. - Chicago Recycle Center reclaims spent solvent that they receive from off-site generators. The solvents include D001 and F001 - F005 wastes. The reclamation processes they employ include distillation, fractionation and liquid-liquid extraction. This site submitted their Part B application on 11/9/88. Since the application thoroughly describes this site's activities, providing a detailed description in this narrative would be redundant. Broadly described, this site has two lines of business: 1) reclaiming waste received on a toll basis and 2) reclaiming industrial solvent waste. (Waste paint related material was, but no longer is, received at this site. It now goes directly to Dolton Safety-Kleen.

The toll business involves reclaiming solvent and returning the same material to the customer. The majority of these wastes are non-hazardous (e.g., lubricant oils). The industrial solvents (methylene chloride; trichloroethylene; 1,1,1 trichloroethane, perchloroethylene and mineral spirits) are received from off-site generators and reclaimed, but they are not necessarily retuned to the same generator (though the generator of these solvents may purchase reclaimed solvent from this site).

Secondary Containment of Tanks

This site has both new and existing tanks (as defined by 720.110). However, the new tanks do not contain hazardous waste and, therefore, are not subject to the secondary containment regulations. The existing tanks

that contain hazardous waste are subject to the secondary containment requirements, for the following reason. The existing tanks (with the exception of a few that are no longer used to contain hazardous waste) were purchased as used tanks and installed between 1981 and 1986. Though some of these tanks may be older than 15 years, the exact ages are unknown. For tanks of unknown ages, the regulations use the age of the facility (15 years being the critical age) to determine when secondary containment, in compliance with 725.293, must be provided. Though these tanks did not exist at this facility fifteen years ago, the facility is older than 15 years, and secondary containment must be provided for all existing tanks. The secondary containment of the existing tanks is not in compliance with the requirements of 725.293; the concrete vault is not coated or lined with a chemical resistant coating to prevent migration of waste into the concrete. Safety-Kleen has recently been planning on adding the coating to the vault. They were attempting to develop their own coating, but their coating failed their tests using methylene chloride. They have chosen to use a coating product made by an outside company, and they had planned on applying this coating this summer. Apparently they need 50 degree weather before they can apply the material.

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HAZARDOUS WASTES GENERATED

Still Bottoms

- F001, F002 (sometimes D001)
- Generated from reclamation of solvent in their still.

- Rate generated: approx. 11,000 gallons/month.
- Sent to Safety-Kleen (Dolton) or Safety-Kleen (Clarksville) for their fuels program.
- Last manifested: 1/23/89.
- Last analyzed: Every shipment is analyzed.
- Currently 16,000 gallons on-site.

Misc. Drummed Waste

- F001, F002
- Generated from several activities:
  1) drippings into buckets after removing a hose line,
  2) cleaning out tanks,
  3) used oil dry and
  4) cutters - drums that have some solids in the bottoms and need to be cut open and scraped out.
- Rate generated: 5 - 10 drums/week of misc. drums. Approx. 90 drums/month of cutters alone.
- Pumpables are pumped into the tank containing the still bottoms that will go the Dolton Safety-Kleen for the fuels program. Some of the waste goes to Deerpark, TX for incineration if it can't go through Dolton's grinding process. Cutter drums are sent to Dolton to be cut and scrapped. They usually have only a small amount of waste in them.
- Last manifested: cutters - 1/19/89.
- Last analyzed: every shipment is analyzed.
- Currently 56 drums on site.

Safety-Kleen Corp.
0316000053
1/31/89

Remanifested Waste

- F001, F002 (sometimes D001)
- Three types of wastes fall under this waste stream:
  1) Waste received that is not intended to be reclaimed on-site; it is temporarily stored until it can be sent to the intended reclamation site (e.g., Dolton Safety-Kleen);
  2) Safety-solvent (received from off-site) sent to Dolton Safety-Kleen for fractionation when Chicago Safety-Kleen's fractionator is too heavily occupied; and
  3) Waste that is mistakenly sent to this site (but fits the description of waste that the site can accept under its permit).
- Rate generated: approx. 10,000 gallons/month.
- Typically sent to Safety-Kleen sites in Dolton, IL and Hebron, OH.
- Last manifested: 1/30/89.
- Last analyzed: every shipment is analyzed.
- Currently 15,264 gallons of Safety-solvent on site. (This quantity on site is inordinately high because Dolton in currently backed up.)

NON-HAZARDOUS WASTES GENERATED

Waste Filters

- Generated from filtering non-hazardous waste as it is pumped into tanks.
- Rate generated: approx. 100 drums/year.

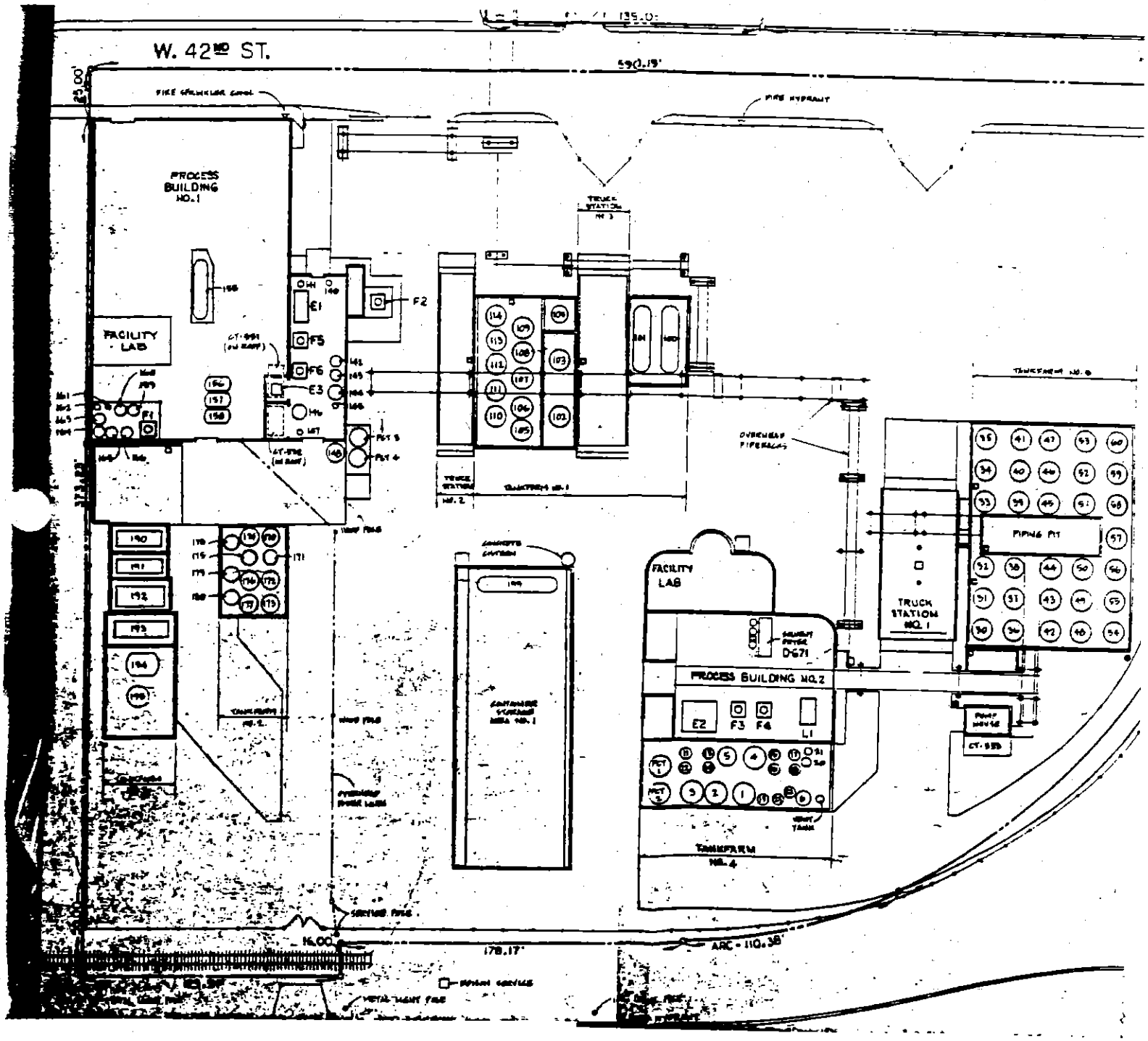
- Sent to Rollins (Deerpark, TX) for incineration.
- Last manifested: 12/12/88.
- Currently 27 drums on site.

Non-hazardous Tank Bottoms

- Generated from cleaning the bottoms of non-hazardous tanks.
- Rate generated: approx. 800 gallons/month.
- Mixed with hazardous waste and sent to Dolton Safety-Kleen (as hazardous waste) for the fuels program.
- Currently none on site.

At the time of the inspection, the following apparent violation was observed:

725.293(a) - Failure to provide secondary containment by January 12, 1989 for existing hazardous waste tanks of unknown age.

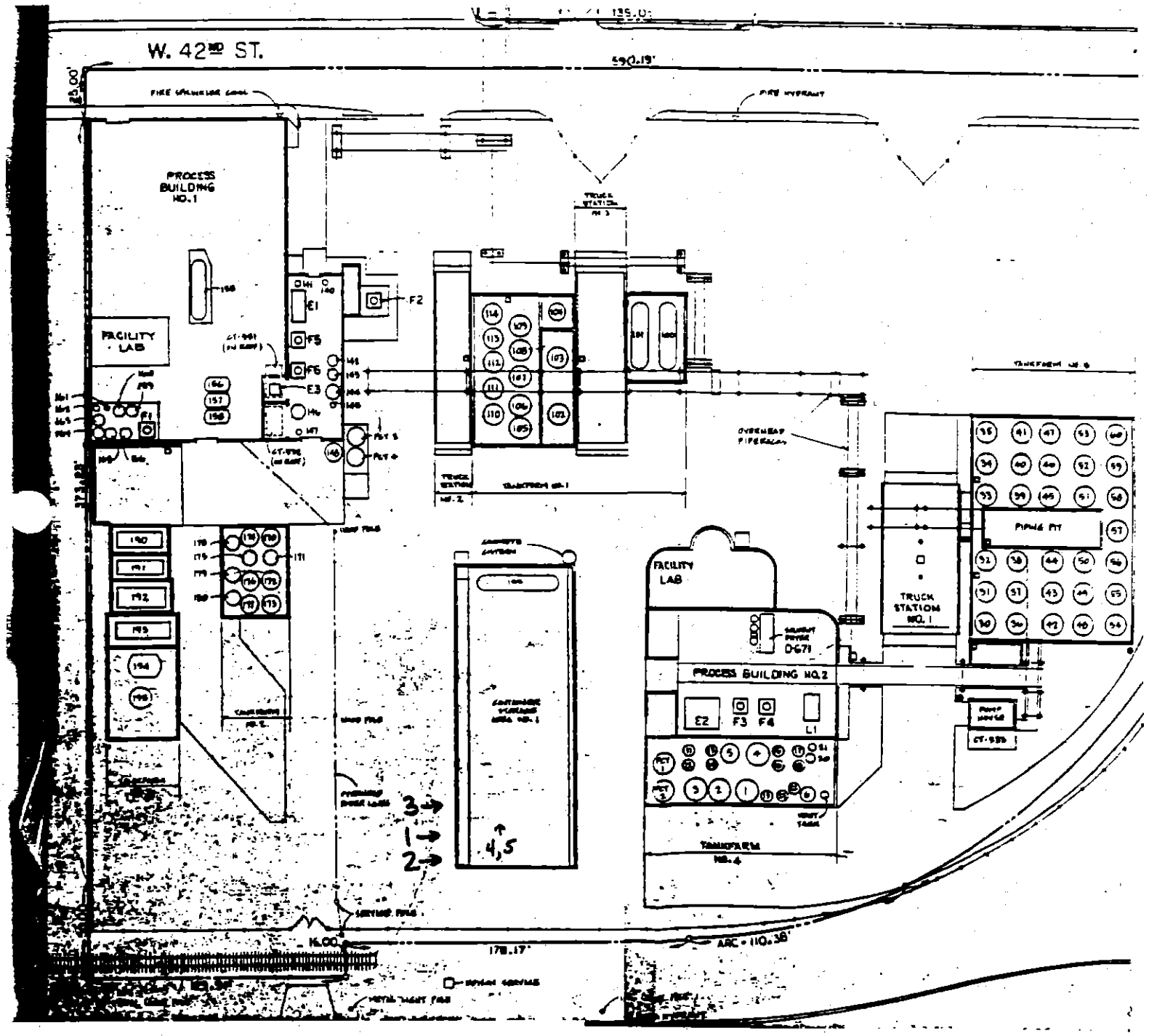


SAFETY-KEEN CORP.
CHICAGO RECYCLE CENTER
EXISTING SITE PLAN
SCALE 1" = 75'

RECEIVED
MAR - 2 1989
IEPA/DLPC

031600053

RECEIVED
MAR 6 1989
IEPA/DLPC



SAFETY-KEEN CORP.
CHICAGO RECYCLE CENTER
EXISTING SITE PLAN
SCALE 1" = 75'

0316000053

Date: 1-31-89

Time: 10:00AM - 4:30PM

Photograph by:

John Maher

City: Chicago

IEPA #: 0316000053

Site Name:

Safety-Kleen Corp.

Comments: Container storage area.

Photo #: 1 Roll #: 89-183

↑
EAST

RECEIVED
MAR 6 1989
IEPA-DLPC

Date: 1-31-89

Time: 10:00AM - 4:30PM

Photograph by:

John Maher

City: Chicago

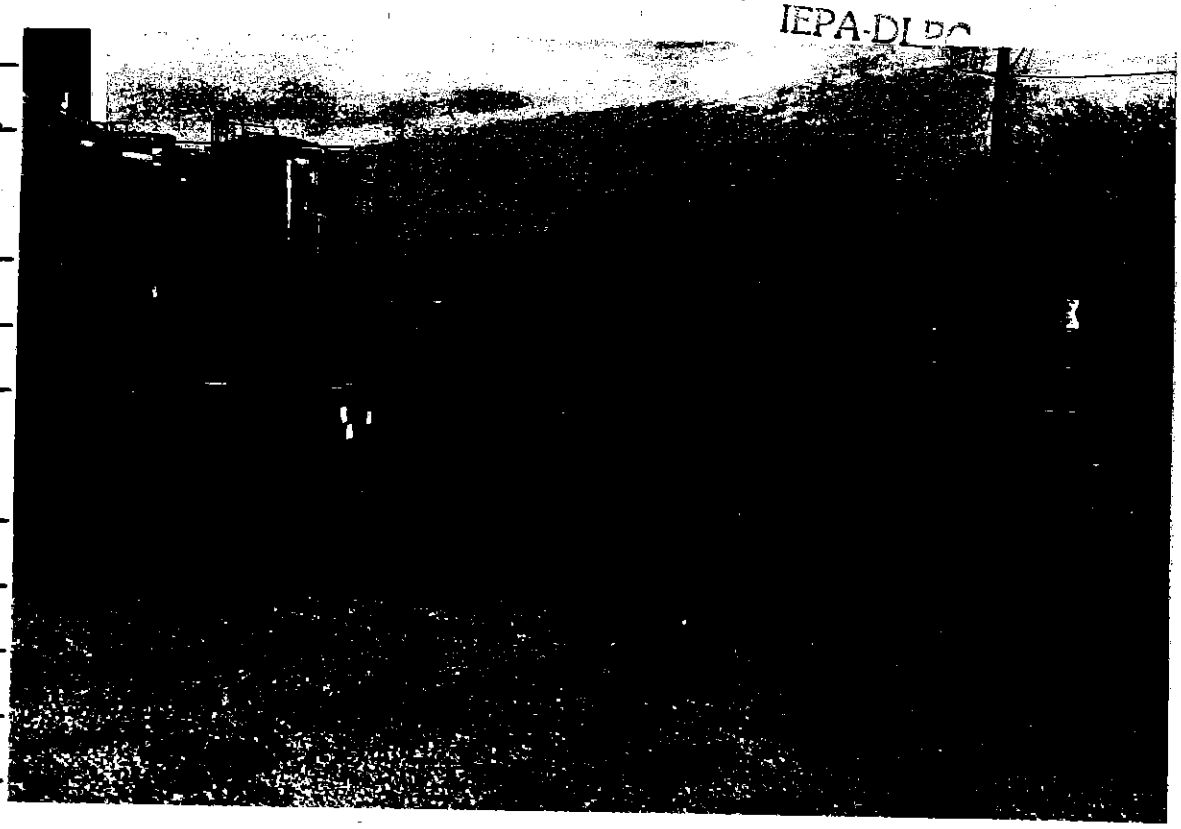
IEPA #: 0316000053

Site Name:

Safety-Kleen Corp.

Comments: Container storage area.

Photo #: 2 Roll #: 89-183



↑
EAST

Date: 1-31-89

Time: 10:00AM - 4:30PM

Photograph by:

John Maher

City: Chicago

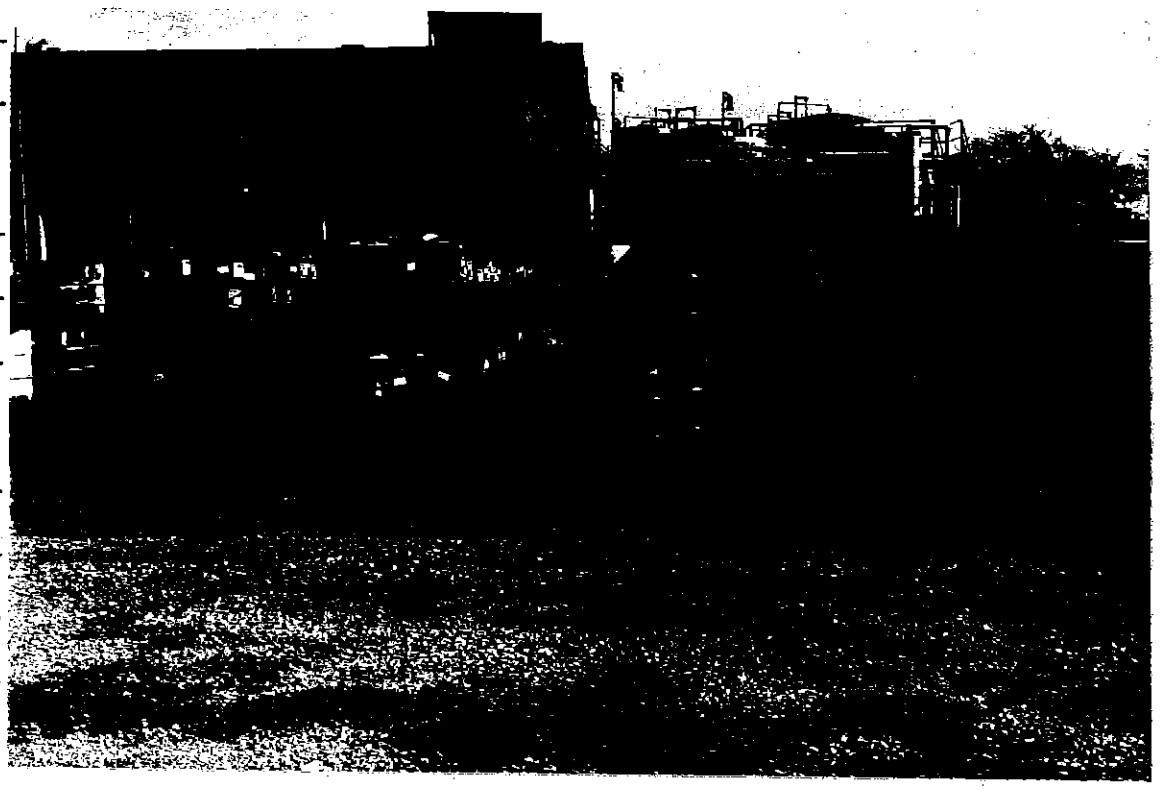
IEPA #: 0316000053

Site Name:

Safety-Kleen Corp.

Comments:

Photo #: 3 Roll #: 89-183



↑
EAST

Date: 1-31-89

Time: 10:00AM - 4:30PM

Photograph by:

John Maher

City: Chicago

IEPA #: 0316000053

Site Name:

Safety-Kleen Corp.

Comments:

Photo #: ____ Roll #: 89-183

Date: 1-31-89

Time: 10:00am - 4:30 PM

Photograph by:

John Maher

City: Chicago

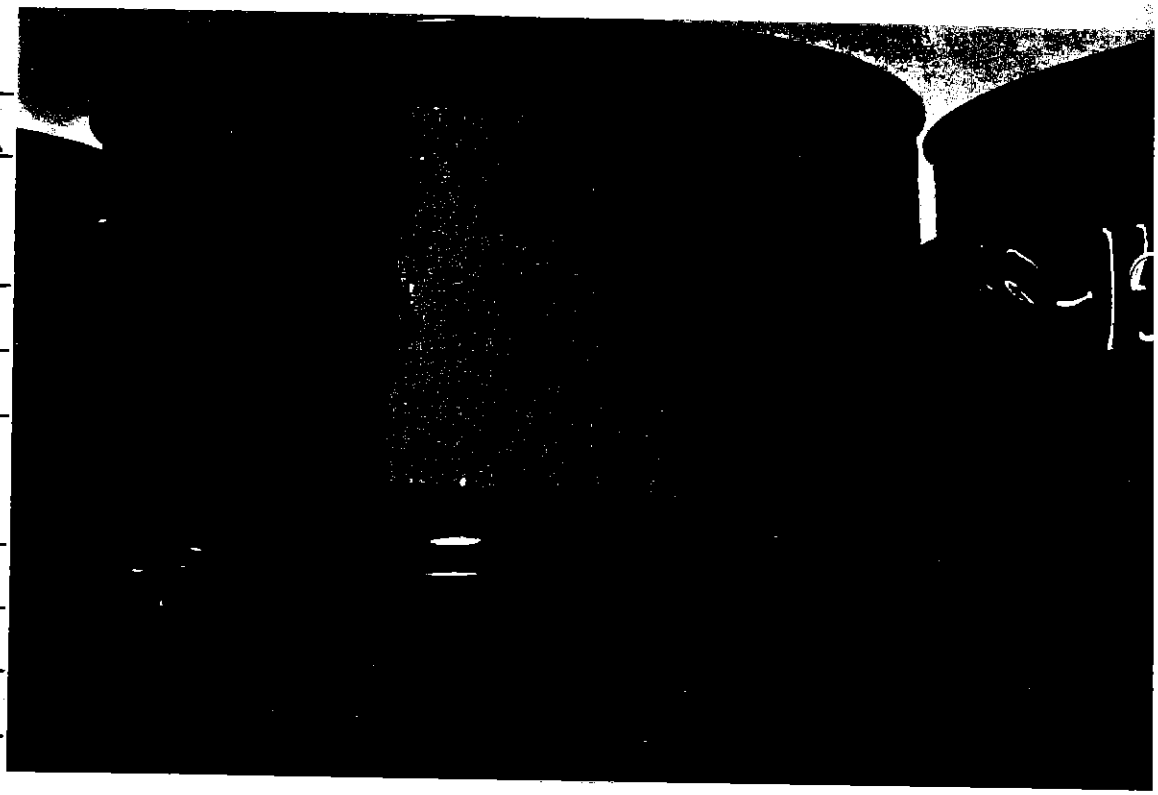
IEPA #: 0316000053

Site Name:

Safety-Kleen Corp.

Comments: Restricted waste. Photo after storage date was marked on label. (Previously unmarked)

Photo #: 4 Roll #: 89-184



Date: 1-31-89

Time: 10:00 AM - 4:30AM

Photograph by:

John Maher

City: Chicago

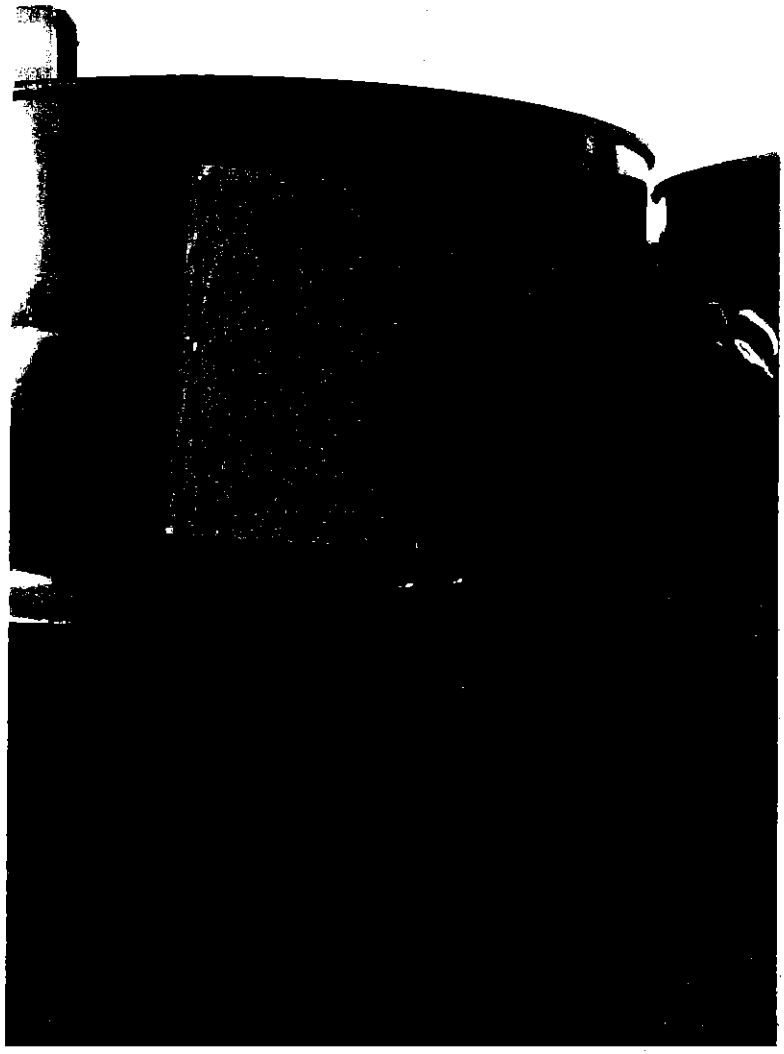
IEPA #: 0316000053

Site Name:

Safety-Kleen Corp.

Comments:

Photo #: 5 Roll #: 89-184



Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
				PART 703 **RCRA PERMIT PROGRAM** **Subpart C: Authorization by Rule and Interim Status**				
OTH	1			**Section 703.150: Application by Existing HWM Facilities and Interim Status Qualifications**	X			
			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 X 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 X 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 X				

D 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 703.151: 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.**			X	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 X 2) As necessary to comply with the provisions of Section 703.155, Changes During Interim Status? Yes X 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.**	X			

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**	X			
				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 X No ___				
			b	- Employing processes not specified in Part A of the permit application? Yes X No ___				
			c	- Exceeding the design capacities specified in Part A of the permit application? Yes X No ___				
OTH	1			**Section 703.155: Changes During Interim Status**	X			
				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 X 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 A: General**				
OTH	1			**Section 722.111: Hazardous Waste Determination**	X			
				Has the generator determined if the solid waste it generates is a hazardous waste? Yes X No ___				
				Did the generator follow the procedures specified in this section in making its determination? Yes X No ___				
OTH	1			**Section 722.112: USEPA Identification Number**	X			
			a	Has the generator obtained a USEPA identification number? Yes X 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 X 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**	X			
			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 X 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 X 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 X				

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**	X			
			a	Did the generator use the manifest supplied by the Agency for hazardous waste going for treatment, storage or disposal in Illinois? Yes X 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 X 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)?	X			
MAN	2			**Section 722.123: Use of the Manifest** For each manifest received, has the generator: 1) Signed the certificate by hand? Yes X No ____ 2) Obtained the handwritten signature and the date of acceptance by the initial transporter? Yes X No ____	X			

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 X No ___				
				4) Apparently sent a copy (Part 5 for Illinois manifests) to the Agency within two working days? Yes X 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 X 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 X				No bulk shipments
			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 X				

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 C: Pre-Transport Requirements**				
OTH	1	X		**Section 722.130: Packaging**	X			
				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**	X			
				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**	X			
			a	Is each package of hazardous waste which is ready for transportation off-site marked in accordance with 49 CFR Part 172? Yes X No ___				
			b	Is each package of hazardous waste which is ready for transportation off-site marked with: - The generator's name and address? Yes X No ___ - The manifest document number associated with the container? Yes X 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 X 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.**	X			
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.**			X	Site is an interim status storage facility. All waste is put in storage.
			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.** **Condition of Containers (Section 725.271)** Has the owner or operator transferred the hazardous waste in leaking container or containers which are not in good condition or managing the waste in some other way that complies with the requirements of this Part? Yes ____ No ____ N/A ____				

Area	Class	90 Day F/U Req	ey 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 ____				No satellite accumulation.

532-1502

Area	Class	90 Day F/U Req	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 ____				

532-1502

Area	Class	90 Day F/U Req	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**	X			
				Has the generator retained for a period of three years:				
			a	- A copy of each signed manifest? Yes X No ___				
			b	- A copy of each annual report? Yes X No ___				
			b	- A copy of each exception report? Yes ___ No ___ N/A X				
			c	- Copies of test results, waste analyses or other determinations made in accordance with Section 722.111? Yes X 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 X				
			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 X				

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**	X			
				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**			X	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				

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?			X	None required.

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	1/2			**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.**			X	No exports.

532-1502

Area	Class	90 Day F/U Req	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**			X	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 ____				

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 G: Farmers**				
OTH	2	X		**Section 722.170: Farmers**			X	No forming activity
				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).**				

Area	Class	5 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**			X	
				Does the facility qualify for any of the exemptions under Section 725.101(c)? Yes ____ No X				
				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 X				These waste are not handled.

IL 532-1502
IPC 258 R/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?	X			
OTH	1			**Section 725.112: Required Notices**	X			
			a	Has the owner or operator of a facility that has arranged to receive hazardous waste from a foreign source notified the Regional Administrator, in writing, at least four weeks in advance of the date that the waste is expected to arrive at the facility? Yes ____ No ____ N/A X				
			b	Before transferring ownership or operation of a facility during its operating life, or of a disposal facility during the post-closure care period, did the owner or operator notify the new owner or operator, in writing, of the requirements of 35 Ill. Adm. Code 703, 703 and 725? Yes X No ____ N/A ____				
OTH	1			**Section 725.113: General Waste Analysis**	X			
			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 X 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.
			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 X 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 X 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 X 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 X No ___ N/A ___				
			b	Has the owner or operator developed a written analysis plan? Yes X No ___ **NOTE: If "No", skip to 725.114.** Is the written waste analysis plan available at the facility? Yes X No ___				

IL 532-1592
LPM: 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.
				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 X 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 X No ___ 2) The test methods which will be used to test for those parameters? Yes X No ___ 3) The sampling method which will be used to obtain a representative sample of the waste to be analyzed? Yes X 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 X No ___ 5) For off-site facilities, the waste analyses that hazardous waste generators have agreed to supply? Yes ___ No ___ N/A X				They perform analyses for their customers.

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.
				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 X				No significantly different wastes being stored in tanks.
				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 X 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 X No ____ N/A ____				
OTH	1	X		**Section 725.114: Security**	X			
				Does the facility qualify for the exemption to the requirement to provide security provided in Section 725.114(a)? Yes ____ No X				

L 532-1592
PC 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
				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 X 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 X 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 X 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 250 8/87

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
OTH	2			**Section 725.115: General Inspection Requirements**	X			
			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 X 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 X 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 X No ___				
			b2	Is the written schedule at the facility? Yes X No ___				
			b3	Does the schedule identify the types of problems which are to be looked for during the inspection? Yes X No ___				
			b4	Does the schedule specify at least the following minimum inspection frequency: - Daily inspections of areas subject to spills? Yes X No ___				

IL 532-1592
LPC 25B 8/87

Area	Class	S 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 X 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 X 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 X				No
			d	Does the owner or operator record the results of inspections in a log or summary? Yes X No ___				
			d	Does the inspection record include: - The date and time of the inspection? Yes X No ___ - The name of the inspector? Yes X 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 notation of the observations made? Yes X No ____				
				- The date and nature of any type of corrective action? Yes X No ____ N/A ____				
OTH	2			**Section 725.116: Personnel Training**	X			
				Does the facility have a training program? Yes X 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 X No ____				
				Is the training program formalized, i.e., written down? Yes X No ____				
			a2	Is the program directed by a person who has been trained in hazardous waste management procedures? Yes X No ____				
			a3	Does the program cover, at a minimum:				
				A) Procedures for using, inspecting, repairing and replacing facility emergency and monitoring equipment? Yes X No ____ N/A ____				

IL 532-1592
IPC 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.
				B) Key parameters for automatic waste feed cutoff systems? Yes ___ No ___ N/A X				No automatic waste feed cutoff systems.
				C) Communications or alarm systems? Yes X No ___ N/A ___				
				D) Response to fire or explosion? Yes X No ___ N/A ___				
				E) Response to ground water contamination incidents? Yes ___ No ___ N/A X				Not an LDF.
				Does the program cover the implementation of the contingency plan? Yes X 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 X No ___ N/A ___				
			c	Has the facility conducted an annual review of the initial training? Yes X 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 X 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.
				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 X 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 X 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 X 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 X No ____ N/A ____				
OTH	1	X		**Section 725.117: General Requirements for Ignitable, Reactive or Incompatible Wastes**	X			
			a	Are ignitable and reactive wastes protected from and separated from sources of ignition and reaction? Yes X No ____				
			a	Are smoking and open flames restricted to specially designated areas when ignitable or reactive waste is being handled? Yes X No ____				

IL 532-1592
(Rev 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 X 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 X No ____ 2) Produce uncontrolled toxic mists, fumes, dusts or gases in sufficient quantities to threaten human health? Yes X No ____ 3) Produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosion? Yes X No ____ 4) Damage the structural integrity of the device or facility containing the waste? Yes X No ____ 5) Through other like means threaten human health or the environment? Yes X No ____				

IL 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.
			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 X 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).**				Secondary containment does not comply with design requirements.
			c4	Is spilled or leaked wastes and accumulated precipitation removed from the secondary containment within 24 hours? Yes X 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 X 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.**				Secondary containment does not comply with design requirements.
			f	Is ancillary equipment protected by secondary containment that meets the requirement of Subsections (h) and (c) except for:				

IL 532-1592
IEM-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.
	-			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 X 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 X				
				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 X				
				3) Are written records maintained at the facility to document the assessments required under Subsections (i)(1) and (2)? Yes ____ No ____ N/A X				

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**	X			
			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 X 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 X				
			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 X				
OTH	2			**Section 725.295: Inspections**	X			
			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 X No ___				
OTH	1	X		**Section 725.296: Response to Leaks or Spills and Disposition of Tank Systems**			X	No 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 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.
				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 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.
			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**			X	
				NOTE: The requirements of this section apply to closure of tank systems. If no closure is being performed, then skip to Section 725.298.				
			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 ____				
			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 532-1592
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 725.298: Special Requirements for Ignitable or Reactive Wastes**	X			
				Are ignitable or reactive wastes stored in tanks? Yes X 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 X 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 X No ___				
OTH	1			**Section 725.299: Special Requirements for Incompatible Wastes**			X	
				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 X				

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.
OTH	1			**Section 725.300: Waste Analysis and Trial Tests**			X	No substantially different wastes 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.				

Name of Facility: Safety-Kleen Corp.

I.D. Number: ILD 005450697 0316000053

Location: 1445 W. 42nd Street

Chicago, IL 60609

Date of Inspection: 1/31/89

Inspector: John Maher

Telephone Number: 312/345-9780

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

Sent [illegible] on 2/2/[illegible]

Are there any known releases? Yes ___ No X

Does the unit receiving CERCLA waste meet the double liner requirements? Yes ___ No ___ N/A X

Any Class I violations? Yes ___ No X

If yes, identify type briefly:

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IEPA/DLPC

Schedule for next inspection: July, 1989

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

Area	Class	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.**			X	

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	X		**Section 725.134: Access to Communications or Alarm Systems**	X			
			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 X 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 X				Never just one employee on the premises.
OTH	1	X		**Section 725.135: Required Aisle Space**	X			
				Is the owner or operator maintaining sufficient aisle space to allow the unobstructed movement of personnel, fire equipment and decontamination equipment to any area of the facility?				
OTH	2			**Section 725.137: Arrangements with Local Authorities**	X			
			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 532-1592
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.
			c	- Portable fire extinguishers, fire control equipment, spill control equipment and decontamination equipment? Yes X 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 X 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 X No ____ N/A ____ - Fire protection equipment? Yes X No ____ N/A ____ - Spill control equipment? Yes X No ____ N/A ____ - Decontamination equipment? Yes X No ____ N/A ____ **NOTE: Any "N/A" answer must be explained in the Comments.**	X			

JL 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**	X			
				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 X No ___				
OTH	1	X		**Section 725.132: Required Equipment**	X			
				Is the facility equipped with the following, unless none of the hazards posed by waste handled at the facility could require a particular kind of equipment:				
			a	- An internal communications or alarm system capable of providing immediate emergency instructions? Yes X 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 X No ___ N/A ___				

IL 532-1592
IPC 258 8/87

Area	Class	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 X 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 X				Chicago Fire Dept. will respond.
				3) Agreements with State emergency response teams, emergency response contractors and equipment suppliers? Yes ___ No ___ N/A X				Site can handle their own spills.
				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 X 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 X				

IL 532-1502
LPC 256 8/87

Area	Class	90 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
				PART 725 **INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES** **Subpart D: Contingency Plan and Emergency Procedures**				
OTH	1			**Section 725.151: Purpose and Implementation of Contingency Plan**	X			
			a	Is a plan available? Yes X 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 X 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 X				
OTH	2			**Section 725.152: Content of Contingency Plan**	X			
			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 X No ___ 2) Explosions? Yes X 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.
				3) Unplanned sudden or non-sudden releases of hazardous waste or hazardous waste constituents to air, soil, or surface water? Yes X No ___				
			c	Does the plan describe the arrangements agreed to by:				
				1) Local police and fire departments? Yes X No ___				
				2) Hospitals? Yes X No ___				
				3) Contractors? Yes ___ No ___ N/A X				Site can handle their own spills.
				4) State and local emergency response teams? Yes X 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 X No ___				
			d	Is the list of emergency coordinators up-to-date? Yes X No ___				
			d	If more than one person is designated as an emergency coordinator is a primary coordinator designated? Yes X No ___				
			e	Does the plan identify:				
				1) A list and physical description of all emergency equipment at the facility? Yes X 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.
				2) A brief outline of the capability of each piece of emergency equipment? Yes X No ___				
				3) The location of each piece of emergency equipment? Yes X No ___				
			e	Is the list of emergency equipment up-to-date? Yes X No ___				
			f	Does the plan include an evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? Yes X No ___ N/A ___				
			f	Does the plan identify the signal to be used to begin evacuation? Yes X No ___				
			f	Are alternate evacuation routes identified? Yes X No ___				
OTH	2			**Section 725.153: Copies of Contingency Plan**	X			
			a	Has a copy (and all revisions) of the contingency plan:				
				a) Been maintained at the facility? Yes X 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 X No ___				

IL 532-1502

Area	Class	5 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**	X			
				Has the contingency plan been reviewed and, if necessary, amended whenever:				
			a	1) Applicable regulations are revised? Yes ____ No ____ N/A X				
			b	2) The plan fails in an emergency? Yes ____ No ____ N/A X				
			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 X				
			d	4) The list of emergency coordinators changes? Yes X No ____				
			e	5) The list of emergency equipment changes? Yes X No ____				
OTH	2			**Section 725.155: Emergency Coordinator**	X			
				Is there an emergency coordinator on-site or on-call at all times? Yes X No ____				

IL 532-1502
LPC 250 8/87

Area	Class	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 X No ____ Does the coordinator have the authority to commit the resources to carry out the contingency plan? Yes X 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.**			X	

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.
				PART 725 **INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES** **Subpart E: Manifest System, Recordkeeping and Reporting**				
MAN	1			**Section 725.171: Use of Manifest System**	X			
				Does the facility accept waste from off-site? Yes X No ____				
				NOTE: If the answer is "Yes", complete this section. If the answer is "No", check "N/A" 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 X No ____				
			a2	2) Note any significant discrepancies in the manifest or each copy of the manifest? Yes X No ____ N/A ____				
			a3	3) Immediately give one copy of the completed manifest to the transporter? Yes X No ____				
			a4	4) Within 30 days after delivery, send one copy of the manifest to the generator and one copy to the Agency? Yes X 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 X No ____				

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.
			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 X				No bulk shipments.
				Does the facility initiate shipments of hazardous waste? Yes X 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**	X			
				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 X 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 ___ N/A X				Discrepancy is either resolved or load is rejected.

IL 532-1502
IDC 258 8/87

Area	Class	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**	X			
			a	Does the owner or operator have a written operating record at the facility? Yes X No ___				
			b	Is the information in the operating record being maintained until closure of the facility? Yes X 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 X No ___ 2) A record of the method(s) and date(s) of its treatment, storage, or disposal as required by Appendix I? Yes X No ___ 3) The location of each hazardous waste within the facility? Yes X No ___ 4) The quantity of each hazardous waste at each location within the facility? Yes X 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 X				

IL 532-1502
LPC 256 8/87

Area	Class	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 X No ___ N/A ___				
				7) Records and results of waste analyses and trial test performed as specified in Sections: - 725.113 (Gen. Waste Analysis)? Yes X No ___ - 725.293 (Tanks)? Yes ___ No ___ N/A X - 725.325 (Surface Improvements)? Yes ___ No ___ N/A X - 725.352 (Waste Piles)? Yes ___ No ___ N/A X - 725.373 (Land Treatment)? Yes ___ No ___ N/A X - 725.441 (Incinerators)? Yes ___ No ___ N/A X - 725.475 (Thermal Treatment)? Yes ___ No ___ N/A X - 725.502 (Chem., Phys., Bio. Treatment)? Yes ___ No ___ N/A X				No significantly different wastes being stored in tanks.
				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 X				

IL 532-1592
LPC 256 8/87

Area	Class	5 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 X 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 X - 725.194 (G.W. Monitoring)? Yes ____ No ____ N/A X - 725.376 (Land Treatment)? Yes ____ No ____ N/A X - 725.378 (Land Treatment)? Yes ____ No ____ N/A X - 735.380(d)(1) (Land Treatment)? Yes ____ No ____ N/A X - 725.447 (Incinerators)? Yes ____ No ____ N/A X - 725.477 (Thermal Treatment)? Yes ____ No ____ N/A X **NOTE: Data required under 725.194 must be kept throughout the post-closure period.**				

Area	Class	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 X No ____ N/A ____				
				12) All post-closure cost estimates for disposal facilities required for Section 725.244? Yes ____ No ____ N/A X				Not an LDF.
OTH	2			**Section 725.174: Availability, Retention and Disposition of Records**	X			
			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 X No ____ N/A ____				
			c	Upon closure of a waste disposal facility did the owner or operator submit a copy of the record of waste disposal location(s) and quantities to: - The Agency? Yes ____ No ____ N/A X - The local land authority? Yes ____ No ____ N/A X				
			b	Are all required records being maintained and retained during the course of any unresolved enforcement action or as requested by the Director? Yes ____ No ____ N/A X				

IL 532-1502
LPC 256 6/87

Area	Class	5 Day F/U Req	Key Ltr / Sub Sec	Requirement	In Apparent Compliance? Yes	No	Not Applicable	Remarks or Comment No.
OTH	2			**Section 725.175: Annual Report**	X			
				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**			X	Unmanifested waste is not accepted.
				Does the facility accept hazardous waste from off-site? Yes ____ No ____				
				NOTE: If the answer is "Yes", complete this section. If the answer is "No", check "N/A" and skip to 725.177.				
				Has the facility accepted hazardous waste from an off-site source for treatment, storage or disposal without an accompanying manifest or shipping paper? Yes ____ No ____				
				Was the hazardous waste accepted without the manifest or shipping paper exempt from the manifesting requirement by 35 Ill. Adm. Code 721.105? Yes ____ No ____				
				NOTE: If the answer to both the above questions is "Yes", check "N/A". If the answer to the first question is "Yes" and the second "No", answer the following questions:				
				Did the owner or operator complete an unmanifested waste report to include the information required in Section 725.176(a) thru (g)? Yes ____ No ____				

IL 532-1502
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.
				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**			X	
				Has the owner or operator submitted to the Agency, as required, reports concerning:				
			a	1) Releases, fires, explosions as specified in Section 725.156? Yes ____ No ____ N/A X				
			b	2) Groundwater contamination and monitoring data as specified in Sections 725.193 and 725.194? Yes ____ No ____ N/A X				
			c	3) Facility closure as specified in Section 725.215? Yes ____ No ____ N/A X				

IL 532-1592
LPC 256 8/87

Area	Class	5 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**	X			
			a	Was the most current facility closure plan available during the inspection? Yes X 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 X				
				- 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 X				
				- 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 X No ___ N/A ___				Submitted with Part B 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 X				

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 X				
				- 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 X				
CLO	1			**Section 725.218: Post-Closure Plan**			X	Not an LDF.
			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**	X			
				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**			X	Not an LDF.
				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

Area	Class	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**	X			
				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**	X			
				Is the owner or operator using containers made of or lined with materials which will not react with and are otherwise compatible with the hazardous waste to be stored so that the ability of the container to contain the waste is not impaired?				
OTH	1	X		**Section 725.273: Management of Containers**	X			
			a	Are containers of hazardous waste always closed during storage? Yes X 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 X No ___				
OTH	2			**Section 725.274: Inspections**	X			
				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 X 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.
				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?	X			
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?			X	No incompatible waste.

IL 532-1592
LPC 256 8/87

Area	Class	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 X 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 ___ N/A X **NOTE: Failing the filter test means that the waste contains free liquids.**				
OTH	2			**Section 725.291: Assessment of Existing Tank Systems**	X			
			a	For tanks not protected by a secondary containment system, is an independent, certified written assessment available? Yes X No ___ **NOTE: Except as provided in Subsection (c) of 725.291, certified assessment must be available by 1/12/88.**				

Area	Class	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 X No ___				
OTH	1			**Section 725.292: Design and Installation of New Tank Systems or Components**	X			However, new tanks are ~~we~~ not yet being used to contain hazardous waste.
			a	For new tanks (built after July 14, 1986) was an independent, certified written assessment prepared? Yes X 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 X No ___				

IL 532-1592
LPC 256 8/87

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.
			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 X No ___				
OTH	I			**Section 725.293: Containment and Detection of Releases**		X		
			a1	Is secondary containment provided for any new tank system (constructed after 7/14/86) before being put into service? Yes ___ No ___ N/A X				There are no new tanks storing hazardous waste.
			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 X				
			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 X				
			a4	For an existing tank of unknown age, has secondary containment been provided by January 12, 1995? Yes ___ No ___ N/A X **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 X N/A ___				Not in compliance with the design requirements.
			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 X				

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referred 9-3-88

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T.O.S.

RCRA LAND DISPOSAL RESTRICTION INSPECTION

Facility: SAFETY-KLEEN / DALTON

U.S. EPA I.D. No.: ILD005450697 / 0316000053

Street: 1445 W. 42ND

City: CHICAGO **State:** IL **Zip Code:** 60609

Telephone: 247-2828

Operator: SAME AS ABOVE

Street:

City: **State:** **Zip Code:**

Telephone:

Owner: SAFETY-KLEEN

Street: 777 BIG TIMBER

City: ELGIN **State:** IL **Zip Code:**

Telephone:

Inspection Date: 7/14/88 **Time:** 850 - 1170 **Weather Conditions:** DRY

	Name	Affiliation	Telephone
Inspectors:	R. FINLEY	IEPA	345-9780

Facility Representatives: TOM HILLSTROM

	RCRA Status	LDR Status F-Solvent	LDR Status California List
Generator	✓	✓	
Transporter			
Treater	✓	✓	
Storer	✓	✓	
Disposer			

Revised 11-03-87

IL 532-1683
LPC 276 3/88 (Pg. 1)

INSPECTION SUMMARY

NO F-BAN VIOLATIONS.

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NARRATIVE

ACTIVITY AT THIS SAFETY-KLEEN FACILITY INVOLVE THE RECOVERY OF ORGANIC CHEMICALS FROM SPENT OR OFF-SPEC WASTES.

WASTES MAY BE TREATED BY ANY OF THE FOLLOWING PROCESSES: T04, WHICH INCLUDES T44 (SEDIMENTATION); T54 (DISTILLATION); T63 (SOLVENT RECOVERY); T61 (LIQUID-LIQUID EXTRACTION) AND T31 (NEUTRALIZATION). THIS SITE ALSO HAS PERMITTED T01 (TANK TREATMENT) S01 (DRUM STORAGE), AND S02 (TANK STORAGE) PROCESSES.

AT THE PRESENT TIME, THIS SITE GENERATES A SINGLE WASTESTREAM, A STILL BOTTOM FROM THE THIN FILM EVAPORATOR, WHICH MAY BE HAZARDOUS D001, F001, F002, OR F003 DEPENDING ON THE ANALYSIS. THIS WASTE IS STORED IN A 7,600 ABOVE GROUND TANK LOCATED ON THE NORTH END OF DRUM STORAGE AREA #1. WASTES GENERATED ARE MANIFESTED TO SK DOLTON FOR FUEL BLENDING OR SK ELGIN FOR FURTHER PROCESSING.

AT THE TIME OF INSPECTION ALL RECORDS / DOCUMENTS WERE IN GOOD ORDER; WASTES APPEARED TO BE PROPERLY MANAGED AND THE FACILITY IN GENERAL COMPLIANCE.

RCRA LAND DISPOSAL RESTRICTION INSPECTION

APPLICABILITY CHECKLIST

Does the facility handle the following wastes?

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

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

B. California List Wastes

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

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

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2. Liquid hazardous waste (including free liquids associated with any solid or sludge) that contains free cyanides at concentrations greater than or equal to 1,000 mg/L no cyanides

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

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

	____	____	____	____	____

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

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

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

____ Yes ____ No ✓ NA

If yes, state reasons for mixing:

_____

_____

5. Liquid hazardous waste that is primarily water and that contains HOCs greater than or equal to 1,000 mg/L (dilute HOC wastewater) and less than 10,000 mg/L

✓	____	✓	____	____

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

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RCRA LAND DISPOSAL RESTRICTION INSPECTION

GENERATOR CHECKLIST

GENERATOR REQUIREMENTS

A. BDAT Treatability Group - Treatment Standards Identification

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

   ✓ Yes ____ No ____ NA

   If yes, check the appropriate treatability group.

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

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

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

      ____ Yes ____ No ✓ NA

      If yes, specify the method: _____

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

      ____ Yes ____ No ✓ NA

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

      _____
      _____
      _____

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IL 532-1683
LPC 276 3/88 (Pg. 5)

B. Waste Analysis

1. F-Solvent Wastes

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

✓ Yes ____ No ____ NA

How was this determination made?

- Knowledge of waste

✓ Yes ____ No

If yes, note how this is adequate: WASTES ARE HANDLED AS EXCEEDING STANDARDS

- TCLP

____ Yes ✓ No

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

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

✓ Yes ____ No ____ NA

If yes, specify the waste stream: F001, F002, F003, F005

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

____ Yes ✓ No ____ NA

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

NO PROCESS CHANGES

2. California List Wastes

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

____ Yes ✓ No ____ NA

b. If the waste is determined to be a liquid according to PFLT, is an absorbent added to the waste? NO SOLIDIFICATION

____ Yes ____ No ✓ NA

What type of absorbent is used? _____

Check the types of waste to which absorbent is added.

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

____ Liquid hazardous waste containing HOCs in concentrations greater than or equal to 1,000 mg/L, but less than 10,000 mg/L

____ Liquid hazardous waste containing metals

____ Liquid hazardous waste containing free cyanides

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

- Knowledge of wastes

____ Yes ____ No ____ NA

If yes, note how this is adequate: _____

- Testing

✓ Yes ____ No ____ NA

If yes, list test method used: pH

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

____ Yes ✓ No ____ NA

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

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

____ Yes ✓ No ____ NA

C. Management

1. On-Site Management

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

✓ Yes ____ No

If yes, the TSD Checklist must be completed.

2. Off-Site Management

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

✓ Yes ____ No

If yes, does the generator provide notification to the treatment or storage facility [268.7(a)(1)]?

✓ Yes ____ No

If yes, does notification contain the following?

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

Identify off-site treatment or storage facilities: SK - DOLTON
SK - ELGIN

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

____ Yes ✓ No

If yes, does the generator provide notification and certification to the disposal facility [268.7(a)(2)]?

____ Yes ____ No

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IL 532-1683
LPC 276 3/88 (Pg. 8)

If yes, does notification contain the following?

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

Identify off-site land disposal facilities: _____

c. If the waste is subject to a nationwide variance (e.g., solvent-water mixtures less than 1%), extension (268.5), or petition (268.6), does the generator provide notification to the off-site disposal facility that the waste is exempt from land disposal restrictions [268.7(a)(3)]?

____ Yes ____ No ✓ NA

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

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

____ Yes ✓ No

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

_____

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RCRA LAND DISPOSAL RESTRICTION INSPECTION

TSD CHECKLIST

TSD REQUIREMENTS

A. General Facility Standards

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

   o F-solvent ✓ Yes ____ No ____ NA

   o California List ✓ Yes ____ No ____ NA

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

   ✓ Yes ____ No

   a. What date was the waste analysis plan last revised? 6-19-86

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

   ✓ On-site ____ Off-site

   Identify off-site lab: ____

   c. Is F-solvent waste analyzed using TCLP?

   ____ Yes ✓ No ____ NA

   d. Describe the frequency of sampling: EACH INCOMING WASTE

   e. Describe procedures used to identify manifest discrepancies: TESTING OF EACH LOAD

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

   ✓ Yes ____ No

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IL 532-1663
LPC 276 3/88 (Pg. 11)

B. Storage (268.50)

1. Are restricted wastes stored on-site?

   ✓ Yes ____ No

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

2. If yes, check the appropriate method.

   ✓ Tanks
   ✓ Containers

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

   ✓ Yes ____ No ____ NA

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

   ✓ Yes ____ No

5. Do operating records agree with container labeling?

   ✓ Yes ____ No ____ NA

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

   ____ Yes ✓ No ____ NA

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

   ____ Yes ____ No

   If yes, state how: _____

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

✓ Yes ____ No ____ NA

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

✓ Yes ____ No

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

✓ Yes ____ No ____ NA

C. Treatment

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

✓ Yes ____ No

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

2. Describe the treatment processes: DISTILLATION

3. Does the facility, in accordance with an acceptable waste analysis plan, determine whether the residue from all treatment processes is less than treatment standards [268.7(b)]?

✓ Yes ____ No

4. Describe frequency of testing treatment residuals: EACH "BATCH" IS TESTED FOR F001, F002, F003 AND F005 LDR STANDARDS.

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5. Is dilution used as a substitute for treatment?

____ Yes ✓ No

6. Are notifications prepared by the generators kept in the facility's operating record?

✓ Yes ____ No

7. Does the facility ship any waste or treatment residue that meets the treatment standards to an off-site disposal facility?

____ Yes ✓ No ____ NA

If yes, does the treatment facility provide notification and certification to the disposal facility?

____ Yes ____ No

If yes, does notification contain the following?

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

Identify off-site disposal facilities: _____

D. <u>Treatment in Surface Impoundments</u> NONE

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

____ Yes ____ No

If no, go to E, Land Disposal.

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

____ Yes ____ No

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

_____ Yes _____ No

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

_____ Yes _____ No

Attach test results.

5. Do the hazardous waste residues (sludges or liquids) exceed the treatment standards specified in 268.41?

_____ Yes _____ No

6. Provide the frequency of analyses conducted on treatment residues: _____

_____

_____

7. Does the operating record adequately document the results of waste analyses performed in accordance with 268.41?

_____ Yes _____ No

8. Are the hazardous waste residues that exceed the treatment standards (268.41) removed adequately and on an annual basis?

Sludge _____ Yes _____ No

Supernatant _____ Yes _____ No

a. If no, and supernatant is determined to exceed treatment concentrations, is annual volume of liquid flowing through the impoundment greater than the impoundment volume?

_____ Yes _____ No

b. Are adequate precautions taken to protect liners, and do records indicate that liner integrity is inspected?

_____ Yes _____ No

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c. Are residues subsequently managed in another surface impoundment?

_____ Yes _____ No

d. Are residues treated prior to disposal?

_____ Yes _____ No

If yes, are waste residues treated on-site or off-site?

_____ On-site _____ Off-site

Identify treatment method: _____

_____

_____

E. **Land Disposal** NONE

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

_____ Yes _____ No

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

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

_____

2. Does the facility operating record have notices and certifications from generators/storer/treaters [268.7(c); 268.7(a),(b)]?

_____ Yes _____ No

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

_____ Yes _____ No

If yes, at what frequency? _____

_____

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

_____ Yes _____ No

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

_____ Yes _____ No

If yes, are these wastes disposed of in a new, replacement, or laterally expanded landfill or impoundment that meets the minimum technology requirements (double liner and leachate collection)?

_____ Yes _____ No

6. Does the facility have notices [268.7(a)(3)] and records of disposal for disposed wastes that are subject to a national capacity variance, case-by-case extensions [268.5], or no migration petitions [268.6]?

_____ Yes _____ No _____ NA

7. What is the volume of the restricted wastes disposed of to date?

_____

_____

8. If the facility has a case-by-case extension, is the facility making progress as described in progress reports?

_____ Yes _____ No _____ NA

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APPENDIX A

SOLVENT IDENTIFICATION CHECKLIST

1. Does the handler generate any of the following F001 constituents (i.e., spent halogenated solvents used in degreasing) as a result of being used in the process either in pure form or commercial grade?

tetrachloroethylene	✓ Yes	___ No
trichloroethylene	✓ Yes	___ No
methylene chloride	✓ Yes	___ No
1,1,1-trichloroethane	✓ Yes	___ No
carbon tetrachloride	✓ Yes	___ No
chlorinated fluorocarbons	✓ Yes	___ No

2. Does the handler generate any of the following F002 constituents (i.e., spent halogenated solvents) as a result of being used in the process either in pure form or commercial grade?

tetrachloroethylene	✓ Yes	___ No
trichloroethylene	✓ Yes	___ No
methylene chloride	✓ Yes	___ No
1,1,1-trichloroethane	✓ Yes	✓ No
chlorobenzene	___ Yes	✓ No
trichlorofluoromethane	✓ Yes	___ No
1,1,2-trichloro-1,2,2-trifluoroethane	✓ Yes	___ No
ortho-dichlorobenzene	___ Yes	✓ No

3. Does the handler generate any of the following F003 constituents (i.e., spent nonhalogenated solvents) as a result of being used in the process either in pure form or commercial grade?

xylene	✓ Yes	___ No
acetone	✓ Yes	___ No
ethyl acetate	✓ Yes	___ No
ethyl benzene	___ Yes	✓ No
ethyl ether	___ Yes	✓ No
methyl isobutyl ketone	✓ Yes	___ No
n-butyl alcohol	✓ Yes	___ No
cyclohexanone	✓ Yes	___ No
methanol	✓ Yes	___ No

If the F003 waste stream has been mixed with a solid waste, does the resultant mixture exhibit the ignitability characteristic? ✓ Yes ___ No

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4. Does the handler generate any of the following F004 constituents (i.e., spent nonhalogenated solvents) as a result of being used in the process either in pure form or commercial grade?

cresols and cresylic acid	___Yes	✓ No
nitrobenzene	___Yes	✓ No

5. Does the handler generate any of the following F005 constituents (i.e., spent nonhalogenated solvents) as a result of being used in the process either in pure form or commercial grade?

toluene	✓ Yes	___No
methyl ethyl ketone	✓ Yes	___No
carbon disulfide	___Yes	✓ No
isobutanol	✓ Yes	___No
pyridine	___Yes	✓ No

6. Are any of the constituents listed in questions 1 through 5 used for their "solvent" properties -- that is to solubilize (dissolve) or mobilize other constituents? The following questions will be helpful in confirming this determination.

WASTE SOLVENTS USED FOR FUEL BLENDING

(a) Are the constituents used as chemical carriers?
___Yes ✓ No

If yes, list the constituents.

_____

_____

(b) Are the constituents used for degreasing/cleaning?
___Yes ✓ No

If yes, list the constituents.

_____

_____

(c) Are the constituents used as diluents?
___Yes ✓ No

If yes, list the constituents.

_____

_____

(d) Are the constituents used as extractants?
___Yes ✓ No

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If yes, list the constituents.

_____

_____

(e) Are the constituents used for fabric scouring?
____Yes ✓No

If yes, list the constituents.

_____

_____

(f) Are the constituents used as reaction and synthesis media?
____Yes ✓No

If yes, list the constituents.

_____

_____

If the responses to questions 1 through 6 led the inspector to believe that the waste may be an F-solvent, answer question 7.

7. Are any of the above constituents spent solvents? (A solvent is considered "spent" when it has been used and is no longer usable without being regenerated, reclaimed, or otherwise reprocessed.) ____Yes ____No

8. If the waste is a mixture of constituents as determined in questions 1 through 6, give the concentration before use of all the constituents in the solvent mixture/blend. For example:

5%	methylene chloride
2%	trichloroethylene
25%	1,1,1-trichloroethane
68%	mineral spirits
100%	

If the waste stream is a mixture containing a total of 10% or more (by volume) of one or more of the F001, F002, F004, or F005 listed constituents before use, it is a listed waste.

With respect to the F003 solvent wastes, if, before use, the waste stream is mixed and contains only F003 constituents, it is a listed waste. For example:

33%	acetone
16%	methanol
51%	ethyl ether
100%	

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If the waste stream is a mixture containing F003 constituents and a total of 10% or more of one or more of the F001, F002, F004, and F005 listed constituents before use, it is a listed waste. For example:

50%	xylene (F003)
12%	TCE (F001)
38%	mineral spirits
100%	

If in light of the above, the handler appears to be generating F001 - F005 hazardous wastes, refer this facility to the enforcement official for followup actions verifying the use of solvents at the facility.

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Wastes shipped to:

TSD NAME LOCATION EPA ID NO.	TYPE OF FACILITY T/D METHODS	WASTE CODE	WASTE QUANTITY	COMMENTS (shipment dates, waste descriptions, etc.)
SK/DOLTON ILD980613913	S01 S02	D001 F001 F002 F003	2,000 gal	6-8-88 STILL BOTTOMS

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IL 532-1683
LPC 276 3/88 (Pg. 23)

STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY
INSPECTION REPORT

USEPA Number: 005450697 IEPA Number: 0316000053

Facility Name: SAFETY-KLEEN

Street: 1445 W 42ND ST.
City: CHICAGO Telephone: 247-2828
County: COOK State: IL Zip Code: 60609

Type of Facility: Notified As: G/TSD / TREAT STORE Regulated As: G/TSD
LDF? yes __ no ✓ HPV? yes __ no ✓ 90 Day Follow-up Required? yes __ no ✓

Region: MAYWOOD Date of Inspection: 1-14-88 From: 8:35 to 1:10 P
Weather (LDF Only): BB 3/7/88

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

Non Regulated Status
Small Quant. Gen:: __ Claimed Nonhandler: __ Other(Specify in narrative): __

~~Notified As/Regulated As Matrix Number: ___ Key Letter: ___~~

Notification date, 8-28-87, from initial __ or subsequent ✓ notification.

Part A date, 8-28-87, from initial __ or amended ✓ Part A withdrawan: ___

Part B permit application submitted? yes __ no ✓

Has the firm been referred to: USEPA? yes __ no ✓ IAG? yes __ no ✓ County States Attorney? yes __ no ✓ Date of referral to USEPA: ___, IAG: ___, County States Attorney: ___. USEPA ref to DOJ? yes — no —

Federal Court Order Issued: ___ State Court Order Issued: ___

USEPA CACO Issued: ___ CAFO Issued: ___ ALJ Decision Issued: ___

Illinois PCB Order Issued: ___

TSD Facility Activity Summary

Activity (By Process Code)	On Pt A	Activity Conducted Prior to 1980	Was Activity Ever Done	Closed	Being Done at Time of Inspection	Exempt from Regulation per 35 IAC, Section:	On Annual Report For 84	85	86
S01	Y	Y	Y	N	Y	—	Y	Y	Y
S02	Y	Y	Y	N	Y	—	Y	Y	Y
T01	Y	Y	Y	N	Y	—	Y	Y	Y
T04	Y	Y	Y	N	Y	—	Y	Y	Y

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Operator: SAFETY KLEEN CORP Telephone #: 247-2828

Street: 1445 W. 42ND

City: CHICAGO State: IL Zip Code: 60609

Owner: SAME AS ABOVE Telephone #:

Street:

City: State: Zip Code:

Person Interviewed	Title	Telephone #
MARIO ROMERO	FAC. MGR.	247-2828
ALFRED AGHAIEPOUR	ASST. MGR	247-2828

Inspection Participants	Agency/Title	Telephone #
RICH FINLEY	IEPA / EPS 3	345-9780

Prepared By	Agency/Title	Telephone #
RICH FINLEY	IEPA / EPS 3	345-9780

Summary of Apparent Violations

Area	Class	Section

Area	Class	Section

Area	Class	Section

ILPC

TITLE

FACILITY SITE PLAN & PROPERTY SURVEY INFORMATION

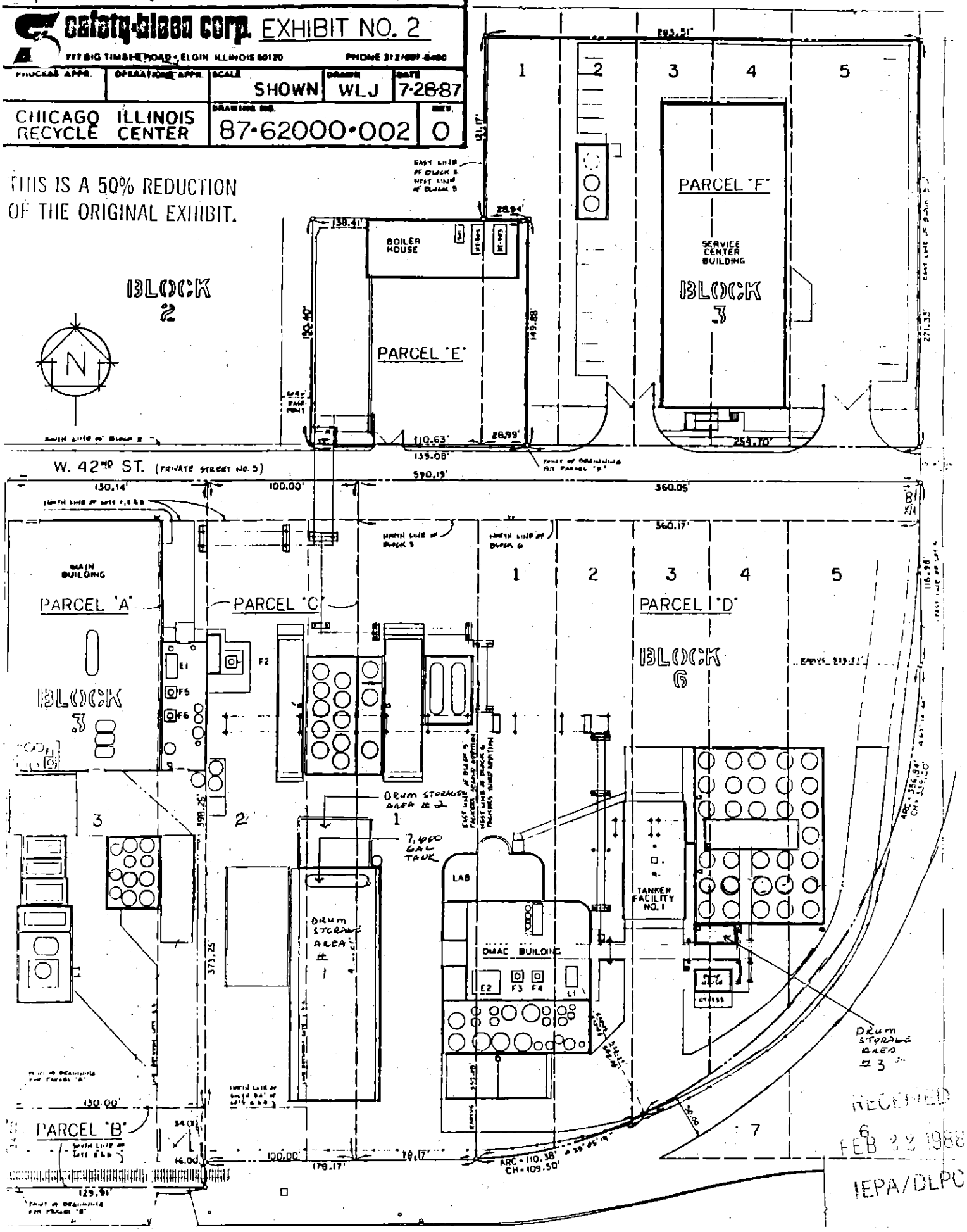
safety-kleen corp. EXHIBIT NO. 2

777 BIG TIMBER ROAD • ELGIN ILLINOIS 60120 PHONE 312/697-8460

PROCESS APPR.	OPERATIONS APPR.	SCALE	DRAWN	DATE
		SHOWN	WLJ	7-28-87

CHICAGO RECYCLE CENTER	ILLINOIS	DRAWING NO.	REV.
		87-62000-002	0

THIS IS A 50% REDUCTION OF THE ORIGINAL EXHIBIT.



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NARRATIVE

ACTIVITY AT THIS SAFETY KLEEN FACILITY INVOLVE THE RECOVERY OF ORGANIC CHEMICALS FROM SPENT OR OFF-SPEC WASTES.

WASTES MAY BE TREATED BY ANY OF THE FOLLOWING PROCESSES: T04, WHICH INCLUDES T44 (SEDIMENTATION); T54 (DISTILLATION); T63 (SOLVENT RECOVERY); T61 (LIQUID-LIQUID EXTRACTION) AND T31 (NEUTRALIZATION). THIS SITE ALSO HAS PERMITTED T01 (TANK TREATMENT, S01 (DRUM STORAGE), AND S02 (TANK STORAGE) PROCESSES.

AT THE PRESENT TIME, THIS SITE GENERATES A SINGLE WASTESTREAM, A STILL BOTTOM FROM THE THIN FILM EVAPORATOR, WHICH MAY BE HAZARDOUS D001 OR F003 DEPENDING ON THE ANALYSIS. THIS WASTE IS STORED IN A 7,600 GALLON ABOVE GROUND TANK LOCATED ON THE NORTH END OF DRUM STORAGE AREA #1

AFTER ACQUIRING THIS SITE FROM CUSTOM ORGANICS, FACILITY OPERATORS DISCOVERED DEFICIENCIES IN STATE OPERATING PERMITS. A PERMIT FOR MODIFICATIONS WAS SUBMITTED ON OCTOBER 23, 1986, THE PERMIT WAS GRANTED IN A LETTER DATED DECEMBER 15, 1987.

AT THE TIME OF INSPECTION, THIS FACILITY APPEARED TO BE IN GENERAL COMPLIANCE.

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WASTE DISPOSITION FORM

Facility Name: SAFETY KLEEN USEPA #: ILD005450697 IEPA #: 031666 053

Waste Name (Include haz & non-haz special & waste for which no determination has been made)	Generating Process (For waste gen. on site. N/A for TSD)	Date of Last Analysis	USEPA Haz Waste #	On 8700-12 *	On 3510-3 *	On Annual Rpt. for 86 *	85 *	84 *	Amount on Site	Rate of Generation	Last Manifested Shipment	Disposition
SOLVENT WASTE	STILL BOTTOMS	2-12-87	D001	Y	Y	Y	Y	Y	6000 gal in TANK	2 mace per mos	3-16-87	PETROCHEM DETROIT, MI
PAM LIQ	THIN FILM EVAP. STILL BOTTOMS	1-11-88	F003	Y	Y	Y	Y	Y			1-11-88	SK ENVIRO SYSTEMS DOLTON FUEL BLENDING

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

ATTACHMENT II 1

2. This permit allows Safety-Kleen (Chicago) to operate the following units:

A. Tank Storage

DIA.	Tank No.	Location	Capacity (gals)	Use
	T-1	TF-4	12,500	Waste Solvent Storage
	T-2	TF-4	12,500	Waste Solvent Storage
11.5"	T-3	TF-4	12,500	Waste Solvent Storage
	T-4	TF-4	12,500	Waste Solvent Storage
9.25'	T-5	TF-4	8,000	Waste Solvent Storage
10'	T-6	TF-4	8,000	Waste Solvent Storage
	T-11	TF-4	3,500	Waste Solvent Storage
	T-12	TF-4	3,500	Waste Solvent Storage
	T-13	TF-4	3,500	Waste Solvent Storage
	T-14	TF-4	3,500	Waste Solvent Storage
6.17'	T-15	TF-4	3,500	Waste Solvent Storage
	T-16	TF-4	3,500	Waste Solvent Storage
	T-17	TF-4	3,500	Waste Solvent Storage
	T-18	TF-4	3,500	Waste Solvent Storage
	T-19	TF-4	3,500	Waste Solvent Storage
5'	T-20	TF-4	1,000	Waste Solvent Storage
4'	T-21	TF-4	500	Waste Solvent Storage
6.5' DIA	T-22	TF-4	3,500	Waste Solvent Storage
	T-23	TF-4	3,500	Waste Solvent Storage
	T-100	TF #1	11,000	Product Storage
	T-101	TF #1	11,000	Product Storage
	T-102	TF #1	12,500	Product Storage
	T-103	TF #1	12,500	Product Storage
	T-104	TF #1	8,000	Product Storage
	T-105	TF #1	12,500	Waste Solvent Storage
	T-106	TF #1	12,500	Waste Solvent Storage
	T-107	TF #1	12,500	Waste Solvent Storage
	T-108	TF #1	12,500	Waste Solvent Storage
	T-109	TF #1	12,500	Waste Solvent Storage
11.5'	T-110	TF #1	12,500	Waste Solvent Storage
	T-111	TF #1	12,500	Waste Solvent Storage
	T-112	TF #1	12,500	Waste Solvent Storage
	T-113	TF #1	12,500	Waste Solvent Storage
	T-114	TF #1	12,500	Waste Solvent Storage
	T-140	Main Bldg	550	In-Process
	T-141	Main Bldg	450	In-Process
	T-142	Main Bldg	1,700	In-Process
	T-143	Main Bldg	1,500	In-Process
	T-144	Main Bldg	3,095	In-Process
	T-145	Main Bldg	800	In-Process

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DIA.	Tank No.	Location	Capacity (gals)	Use
	T-146	Main Bldg	3,095	In-Process
	T-147	Main Bldg	800	In-Process
	T-155	Main Bldg	4,000	Product Sodium Hydroxide Storage
	T-156	Main Bldg	2,500	In-Process
	T-157	Main Bldg	2,500	In-Process
	T-158	Main Bldg	2,500	In-Process
	T-159	Main Bldg	1,100	In-Process
	T-160	Main Bldg	1,100	In-Process
	T-161	Main Bldg	130	In-Process
	T-162	Main Bldg	200	In-Process
	T-163	Main Bldg	1,100	In-Process
	T-164	Main Bldg	1,100	In-Process
	T-165	Main Bldg	1,200	In-Process
	T-166	Main Bldg	1,200	In-Process
6.17'	T-170	TF-2	3,500	Waste Solvent Storage
	T-171	TF-2	3,095	Waste Solvent Storage
	T-172	TF-2	5,335	Waste Solvent Storage
4.90'	T-173	TF-2	5,335	Waste Solvent Storage
4.13'	T-174	TF-2	4,500	Waste Solvent Storage
6.17'	T-175	TF-2	3,095	Waste Solvent Storage
	T-176	TF-2	5,335	Waste Solvent Storage
4.90'	T-177	TF-2	5,335	Waste Solvent Storage
	T-178	TF-2	6,500	Waste Solvent Storage
6'	T-179	TF-2	6,500	Waste Solvent Storage
	T-180	TF-2	6,500	Waste Solvent Storage
7.6	T-190	TF-3	8,300	Waste Solvent Storage
	T-191	TF-3	8,300	Waste Solvent Storage
13.24'	T-192	TF-3	14,400	Waste Solvent Storage
9'	T-193	TF-3	10,185	Waste Solvent Storage
10.8'	T-194	TF-3	11,835	Waste Solvent Storage
18.3'	T-195	TF-3	20,000	Waste Solvent Storage
6.9'	T-199	Container Area #1	7,600	Waste Solvent Storage
	PCT1	TF #4	10,000	Pollution Control Tank (87-62000-504)
	PCT2	TF #4	10,000	Pollution Control Tank (87-62000-504)
	PCT3	Outside Main Bldg	10,000	Pollution Control Tank (87-62000-504)
	PCT4	Outside Main Bldg	10,000	Pollution Control Tank (87-62000-504)

B. Container Storage Areas

Storage Area	Dimensions	Capacity (Gals)	Location
1	150'x50'	174,900	West of DMAC Building

Area	Cl	90 Day F/U Req	Day Ltr Sub-sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
				PART 722 GENERATOR STANDARDS Subpart A: General				
OTH	1		B, C, F, G, I, J	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 ___				
			B	Section 722.112: USEPA Identification Number	✓			
			§ a)	Has the generator obtained a USEPA identification number? Yes ✓ No ___				
			§ b)	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 ___				

1

Area	Cl	90 Day F/U Req	Key Ltr Sub-sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
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 ___				
			§ b)	For hazardous waste going outside Illinois for treatment, storage or disposal, has the generaused 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? Yes ___ No ___ N/A ✓				USED MICHIGAN MANIFEST
			§ c)	For hazardous waste going outside Illinois for treatment, storage or disposal, has the generator used the manifest supplied by and requiring completion by the State to which the hazardous waste is being shipped? Yes ✓ No ___ N/A ___				
			§ d)	Did the generator designate on the manifest one facility which is permitted to handle the hazardous waste therein described? Yes ✓ No ___ N/A ___ 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)					

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2

Area	Cl	90 F/U	Key Ltr	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
			e)	Does the generator produce greater than 100 kg but less than 1000 kg of hazardous waste in a calendar month where, the waste is reclaimed under a contractual agreement pursuant to which:			✓	GENERATES > 1000 KG/ CALENDAR MOS. NO RECLAIMATION CONTRACT
			e)1)A)	The type of waste and frequency of shipments are specified in the agreement: yes — no —				
			e)1)B)	The vehicle used to transport the waste to the recycling facility and to deliver regenerated material back to the generator is owned and operated by the reclaimer of the waste; and yes — no —				
			e)2)	Does the generator maintains a copy of the reclamation agreement in his files for a period of at least three years after termination of expiration of the agreement. yes — no —				
				Note: If the answers to all the above questions were "yes", the generator need not comply with the requirements of this subpart for these wastes.				

GN-B-2

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3

Area	Cl	90 I F/U	Key Ltr Sub Sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
			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 _____				
MAN	2			Section 722.121 Acquisition of Manifests	✓			
			a) or B)	This section reiterates the requirements for generators to use Illinois manifests for hazardous waste going for treatment, storage or disposal in Illinois; or consignment State manifests for wastes going out of State for treatment, storage or disposal unless the consignment State does not supply its own manifest, in which case the generator must use the Illinois manifest. A "No" answer to the second or third question under Section 722.120, General Requirements, also indicates non-compliance with this section.				
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)? Yes ✓ No _____				

4

Area	Cl	90 / 1/U	Key Ltr Sub Sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
MAN				Section 722.123 Use of the Manifest	✓			
			a)	For each manifest reviewed, 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 ____				
				3) Retained one copy as required by Section 722.140(a), Record keeping? Yes ✓ No ____				
				4) Apparently sent a copy (Part 5 for Illinois manifests) to the Agency within two working days? Yes ✓ No ____				
			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 RAIL OR WATER
			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 ✓				

GIN-13-4

5

Area	Cl	Day F/U	Key Ltr Sub Sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
				Part 722				
				GENERATOR STANDARDS				
				Subpart C: Pre-transport Requirements				
				Section 722.130 Packaging	___	___	✓	NO WASTE READY FOR TRANSPORT AT THE TIME OF INSPECTION
OTH	1	X		Is waste which is ready for transportation off-site packaged in accordance with 49CFR, Parts 173, 178 and 179? Yes ____ No ____				
OTH	1	X		Section 722.131 Labeling	___	___	✓	
				Is each package of hazardous waste which is ready for transportation off-site labeled in accordance with 49CRR Part 172? Yes ____ No ____				
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 49CFR Part 172? Yes ___ No___				
			b)	Is each package of hazardous waste which is ready for transportation off-site marked in accordance with:				
				- The generator's name and address? Yes ____ No ____				
				- The manifest document number associated with the container? Yes ____ No ____				

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Area	Cl	90 I F/U	Key Ltr Sub Sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
				- 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 _____				
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 49CFR, Part 172, Subpart F? Yes ___ No ___				
OTH	1	X		Section 722.134 Accumulation Time			✓	PERMITTED STORAGE FACILITY
				Has the generator (who is not a small quantity generator in compliance with the requirements in Section 721.105) only accumulated hazardous waste on site for periods of 90 days or less? Yes _____ No _____				
				Note: If the answer is "Yes", complete the following questions. If the answer is "No", and there is more than 1000 kg (one kg of accute hazardous waste or 100 kg of any residue or contaminated soil, waste or other debris resulting from the clean up of a spill, into or on any land or water, of any accute hazardous waste listed in Sections 721.121, 721.132 or 721.133 (e)) the firm is a storage facility. Complete the TSD inspection form, unless the generator has requested and has been granted an extension as provided for in Section 722.134 (b).				

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7

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Area	Cl	Day F/U	Key Ltr Sub Sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
				Part 722				
				GENERATOR STANDARDS Subpart D: Record keeping 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____				
			c)	- Copies of test results, waste analyses or other determinations made in accordance with Section 722-111? Yes ✓ No____				
			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 OR REQUESTS FROM THE DIRECTOR.
			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 ✓				
OTH	2			Section 722.141 Annual Reporting	✓			
			a)	Has the generator who ships waste off-site prepared and submitted a copy of an annual report, as supplied by the Agency, to the Agency by March 1, for the preceeding calendar year? Yes ✓ No____				

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8

Area	Cl	Key F/U	Key Ltr Sub Sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Numbe
			a)	Does the annual report include a description of: - The efforts undertaken during the year to reduce volume and toxicity of waste generated? Yes ✓ No ____ N/A ____ - The changes in volume and toxicity of waste actually achieved during the year in comparison to previous years to the extent such information is available for years prior to 1984?. Yes ✓ No ____ N/A ____ Note: The above descriptions will be required on annual reports for calendar year 1986 and later. Note: A generator who treats, stores or disposes of hazardous waste on-site must 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 SUCH INSTANCES
			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____				

Area	Cl	90 Day F/U	Key Ltr Sub Sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
			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 - 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? Yes ✓ No ___				
OTH	2			Section 722.144 Special Requirements for Generators of Between 100 and 1000 Kilograms ~~of~~ per Month.	___	___	✓	GENERATES > 1000 Kg/mos.
				Has the generator retained for a period of three years: A copy of each signed				

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Area	Cl	90 F/U	Key Ltr Sub-Sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
				— Copies of test results, waste analyses or other determinations made in accordance with Section 722.111? yes — no —				
				Does a generator who is involved in any unresolved enforcement action continue to maintain the records identified above? yes — no — N/A —				
				If the Director has requested that the records identified above be maintained for a period longer than three years, has the generator continued to maintain them? yes — no — N/A —				

11

Area	Cl	Day F/U	Key Ltr Sub Sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Numbe
				Part 722				
				GENERATOR STANDARDS				
				Subpart E: Special Conditions				
OTH	1			Section 722.150 International Shipments	___	___	✓	NO INTERNATIONAL SHIPMENTS
			b)1)	Has the generator notified the Administrator and Agency, in writing, four weeks before the initial shipment of hazardous waste to each country in each calendar year? Yes ___ No ___ N/A ___				
			b)1)	Does the notice include the following?				
				- The waste identification by its USEPA hazardous waste identification number and its DOT shipping description and,				
				- The name and address of the foreign consignee? Yes ___ No ___				
			b)2)	Has the generator received confirmation, in writing, from the foreign consignee that the waste had been delivered? Yes ___ No ___				
				Note: A copy of the manifest signed by the foreign consignee may be used for this purpose.				
			b)3)	Has the generator met the manifest requirements of Section 722.120 except that:				
				- In place of the name, address, and USEPA identification number of the designated facility, the name and				

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Area	Cl	Day F/U	Key Ltr Sub Sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Numbe
				address of the foreign consignee is used, and - The generator identifies the point of departure from the United States, that the waste must travel before entering a foreign country? Yes ____ No ____				
			b)4)	Is the generator using manifests obtained from the Agency for its international shipments? Yes ___ No ____ N/A ____				
			c)1)	Has the generator filed an exception report if it has not received a signed copy of the manifest from the transporter stating the date and place of departure of the waste from the United States within 45 days of the date the waste was accepted by the transporter? Yes ___ No ____ N/A ____				
			c)2)	Has the generator filed an exception report if it has not received written confirmation from the foreign consignee of the arrival of the waste within 90 days of the date the waste was accepted by the initial transporter? Yes ___ No ____ N/A ____				
			d)	Has the person exporting hazardous waste filed with the Administrator and the Agency, no later than March 1 of each year, a report summarizing the types, quantities, frequency and ultimate destination of all such hazardous waste exported during the previous calendar year? Yes ___ No ____ N/A ____				

Area	Cl	Op I/F/U	Key Ltr Sub Sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
			e)1)	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.				
			e)2)	Has the importer or his agent signed the manifest in place of the generator? Yes ___ No ___ N/A ___				
			e)2)	Has the importer or his agent obtained the signature of the initial transporter? Yes ___ No ___ N/A ___				
			f)	Is the person importing hazardous waste using manifests obtained from the Agency? Yes ___ No ___ N/A ___				
OTH	2	X		Section 722.151 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 ___	___	___	✓	NO FARM ACTIVITY.

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Area	Cl	Day F/U	Key Ltr Sub Sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
				- 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).				

153

Area	Cl	Day F/U	Key Ltr Sub Sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Numbe
				Part 703				
			E, H, I, J	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 an HWM facility in existence on the effective date of satutory or regulatory amendments that render the facility subject to the requirement to have a RCRA permit submitted Part A of the permit application to the Agency no later than the following times, whichever comes first:				
				1) Six months after the date of publication of regulations which first require the owner or operator to comply with standards in 35 Ill. Adm. Code 725? Yes ✓ No ___ N/A ___				
				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? N/A ✓				

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17

Area	Cl	Key F/U	Key Ltr Sub Sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Numbe
OTH	1			Section 703.152 Amended Part A Application	✓			
				Has the owner or operator of an HWM with interim status filed an amended Part A permit application with the Agency:				
			a)1)	1) No later than the effective date of revised regulations under 35 Ill. Adm. Code, 721, Identification and Listing of Hazardous Waste, listing or identifying additional hazardous waste which the HWM facility is handling? Yes ✓ No ___ N/A ___				
			a)2)	2) As necessary to comply with the provisions of Section 703.155, Changes During Interim Status? Yes ✓ No ___ N/A ___				
				Note: The owner or operator of a facility who fails to comply with the updating requirements of this section does not receive interim status as to the wastes not covered by duly filed Part A applications.				
OTH	1			Section 703.154 Prohibitions During Interim Status	✓			
				During interim status has the facility refrained from:				
			a)	- Treating, storing or disposing of hazardous waste not specified in Part A of the permit application? Yes ✓ No ___				

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Area	Cl	Day F/U	Key Ltr	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Numbe
				- Employing processes not specified in Part A of the permit application? Yes ✓ No ___				
				- Exceeding the design capacities specified in Part A of the permit application? Yes ✓ No ___				
OTH	1			Section 703.155 Changes During Interim Status	✓	___	___	
			a) b) or c)	Note: Section 703.155 (a) (b) and (c) reiterate in more detail the requirement that a HWM facility submit and, in the case of (b) and (c) that the Agency approve, amendments to the Part A permit application prior to the facility conducting the activity or receiving new hazardous waste. A "No" answer to any of the questions under Section 703.154 means the facility is also in apparent non-compliance with this section.				
			d)	Did the owner or operator submit a revised Part A permit appication not later than 90 days prior to changes in operational control or ownership of the HWM facility? Yes ✓ No ___ N/A ___				
				Section 703.156 Interim Status Standards	✓	___		
OTH	1			Is the owner or operator complying with all interim status standards of 35 Ill. Adm. Code 725? Yes ✓ No ___				
				Note: Complete the applicable portions of the TSD inspection form prior to answering the above questions.				

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Area	Cl	Day F/U	Key Ltr Sub Sec.	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Numbe
				Part 725				
			E, H, I, J,	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	✓			
			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 ✓				

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20

Area	Cl	J Day F/U	Key Ltr	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
				Part 725				
				INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES				
				Subpart B — General Facility Standards				
OTH	1			Section 725.111 — USEPA Identification Number	✓			
				Has the facility obtained a USEPA identification number? Yes ✓ No ___				
				Section 725.112 — Required Notices			✓	NO WASTE FROM A FOREIGN SOURCE OR CHANGE OF OWNERSHIP.
			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 ✓				
			b)	Before transferring ownership or operation of a facility during its operating life, or of a disposal facility during the post-closure care period; did the owner or operator notify the new owner or operator, in writing, of the requirements of 35 Ill. Adm. Code 702, 703 and 725? Yes ___ No ___ N/A ✓				
OTH	1			Section 725.113 — General Waste Analysis	✓			
			a)1)	Has the owner or operator of the facility obtained a detailed chemical analysis of each waste prior to its treatment, storage or disposal? Yes ✓ No ___				

21

Area	Cl	Day F/U	Key Ltr	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
			a)1)	Does the analysis contain all the information which must be known to treat, store or dispose of the waste in accordance with this Part? Yes ✓ No ___				
				Has the analysis been repeated:				
			a)3)	A) When the operator is notified or has reason to believe that the process generating the hazardous waste has changed? Yes ✓ No ___ N/A ___				
			a)3)	B) By off-site facilities, when the results of the inspection required in Section 725.113 (a)(4) indicate that the hazardous waste received at the facility does not match the waste designated odn the accompanying manifest or shipping paper? Yes ✓ No ___ N/A ___				
			a)4)	Has the owner or operator of an off-site facility apparently inspected each hazardous waste movement received at the facility to determine whether it matches the identity of the waste specified on the accompanying manifest or shipping paper? Yes ✓ No ___ N/A ___				
			b)	Has the owner or operator developed a written waste analysis plan? Yes ✓ No ___				
			b)	Is the written waste analysis plan available at the facility? Yes ✓ No ___				
			b)	Does the owner or operator follow the procedures in the written plan so as to comply with the requirements in Section 725.113 (a)? Yes ✓ No ___				

22

Area	Cl	Day F/U	Key Ltr Sub Sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
			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 analyzed? Yes ✓ No ___				
				4) The frequency with which the initial analysis of the waste will be reviewed or repeated to ensure that the analysis is accurate and up-to-date? Yes ✓ No ___				
				5) For off-site facilities, the waste analyses that hazardous waste generators have agreed to supply? Yes ✓ No ___				
				6) The methods which will be used to meet the additional analysis requirements for specific waste managment methods as specified in Sections:				
				- 725.293 (Tanks);				
				- 725.325 (Surface Impoundments);				
				- 725.352 (Waste Piles);				
				- 725.373 (Land Treatment);				
				- 725.414 (Incinerators);				
				- 725.475 (Thermal Treatment);				
				- 725.502 (Chem. Phys. Bio. Treat.) Yes ✓ No ___ N/A ___				

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Area	Cl	9 Day F/U	Key Ltr	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
				Note: Circle the specific waste management methods being employed.				
			c)	For off-site facilities, does the plan:				
				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 fo the exemption to the requirement to provide security provided in Section 725.114 (a)? Yes ___ No ✓				
			b)1)	Does a non-exempt facility have either:				
				1) A 24-hour surveillance system which continuously monitors and controls entry into the active portion of the facility? Yes ✓ No ___				
				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 ___				

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TSD-B-4

24

Area	Cl	9 Day F/U	Key Ltr	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
			c)	Does a non-exempt facility have a sign, legible from a distance of at least 25 feet, with the words "Danger - Unauthorized Personnel Keep Out" at each entrance to the active portion of the facility and at other locations in sufficient numbers to be seen from any approach to the active portion? Yes ✓ No ___ 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.				

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25

Area	Cl	Day F/U	Key Ltr	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
OTH	2			Section 725.115 General Inspection Requirements				
			a)	Does the owner or operator inspect the facility for malfunctions, deterioration, operator errors and discharges which are causing or may lead to: 1) Release of hazardous waste or hazardous waste constituents to the environment; or 2) A threat to human health? Yes ✓ No ___				
			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 ___				
			b)1)	Has the owner or operator developed a written schedule for inspecting all monitoring equipment, safety and emergency equipment, security devices and operating and structural equipment important to preventing, detecting or responding to environmental or human health hazards? Yes ✓ No ___				
			b)2)	Is the written schedule at the facility? Yes ✓ No ___				
			b)3)	Does the schedule identify the types of problems which are to be looked for during the inspection? Yes ✓ No ___				
			b)4)	Does the schedule specify at least the following minimum inspection frequency:				

Area	Cl	Day F/U	Key Ltr	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
				- Daily inspections of areas subject to spills? Yes ✓ No ___				
				- 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 fo 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 ___				

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27

Area	Cl	May F/U	Key Ltr	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Numbe
				- 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	✓			
			a)1)	Have facility personnel who are involved with hazardous waste managment successfully completed a program of classroom or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the requirements of this Part? Yes ✓ No ___				
			a)1)	Is the training program formalized, i.e. written down? Yes ✓ No ___				
			a)2)	Is the program directed by a person who has been trained in hazardous waste management procedures? Yes ✓ No ___				
			a)3)	Does the program cover, at a minimum:				
				A) Procedures for using, inspecting, repairing and replacing facility emergency and monitoring equipment? Yes ✓ No ___ N/A ___				
				B) Key parameters for automatic waste feed cutoff systems? Yes ✓ No ___ N/A ___				
				C) Communications or alarm systems? Yes ✓ No ___ N/A ___				
				D) Response to fire or explosion? Yes ✓ No ___ N/A ___				

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Area	Cl	Day F/U	Key Ltr	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
				E) Response to ground water contamination incidents? Yes ✓ No ___ N/A ___				
			a)3)	Does the program cover the implementation of the contingency plan? Yes ✓ No ___				
			b)	Have new employees completed the program within six months of the date of employment or assignment to a position requiring them to manage hazardous waste? Yes ✓ No ___ N/A ___				
			c)	Has the facility conducted an annual review of the initial training? Yes ✓ No ___ N/A ___				
			d)	Are the following documents and records being maintained at the facility:				
				1) The job title for each position related to the management of hazardous waste and the name(s) of the employee(s) filling each job? Yes ✓ No ___				
				2) A written job description for each job position above, to include the requisite skill, education or other qualifications and duties of personnel assigned to each position? Yes ✓ No ___				
				3) A written description of the type and amount of both initial and continuing training that will be given to each person holding a position dealing with hazardous waste management? Yes ✓ No ___				

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29

Area	Cl	Day F/U	Key Ltr	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
				4) Records to document that the training or job experience have been given to and completed by personnel dealing with hazardous wastes management? Yes ✓ No ___				
			e)	Is the facility maintaining training records of former employees who were involved in hazardous waste management for a period of at least three years? Yes ✓ No ___ N/A ___				
OTH	1	X		Section 725.117 General Requirements for Ignitable, Reactive or Incompatible Wastes	✓			
			a)	Are ignitable and reactive wastes protected from and separated from sources of ignition and reaction? Yes ✓ No ___				
			a)	Are smoking and open flames restricted to specially designated areas when ignitable or reactive waste is being handled? Yes ✓ No ___				
			a)	Are "No Smoking" signs posted whenever there is a hazard from ignitable or reactive waste? Yes ✓ No ___				
			b)	Is the treatment, storage or disposal of ignitable or reactive waste and the mixture or comingling of incompatible wastes and materials being done so that it does not:				
				1) Generate extreme heat or pressure, fire, or explosion or violent reaction? Yes ✓ No ___				

Area	Cl	Day F/U	Key Ltr	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
				2) Produce uncontrolled toxic mists, fumes, dusts or gases in sufficient quantities to threaten human health? Yes ✓ No ___				
				3) Produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosion? Yes ✓ No ___				
				4) Damage the structural integrity of the device or facility containing the waste? Yes ✓ No ___				
				5) Through other like means threaten human health or the environment? Yes ✓ No ___				
				Section 725.118 Location Standards	✓			
				Has the facility placed hazardous waste in a salt dome, salt bed formation, underground mine or cave after July 11, 1986? Yes ___ No ✓				
				Note: A "Yes" answer is a violation of the location standard.				

31

Area	Cl	90 F/U	Key Ltr	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
				Part 725				
				INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES				
				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 ___				

Area	Cl	9 Day F/U	Key Ltr Sub-sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
			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 ___				
			c)	- Portable fire extinguishers, fire control equiment, 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 ___				

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Area	Cl	9 Day F/U	Key Ltr / Sub-sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
				Note: Any "N/A" answer must be explained in the Comments.				
OTH	1	X		Section 725.134 Access To Communications Or Alarm Systems	✓			
			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 PREMISES WHILE OPERATING.
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? Yes ✓ No ___ N/A ___				
OTH	2			Section 725.137 Arrangements with Local Authorities	✓			
				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:				

Area	C1	90 Day F/U	cy Ltr Sub-sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
			a)1)	1) Arrangements to familiarize police and fire departments and emergency response teams with the layout of the facility, properties of hazardous wastes handled at the facility and associated hazards, places where personnel would normally be working, entrances to roads inside the facility and possible evactuation routes? Yes ✓ No ___ N/A ___				
			a)2)	2) Where more than one police or fire department might respond to an emergency, has one been designated as the primary emergency authority with the others agreeing to provide support to the the primary emergency authority? Yes ___ No ___ N/A ✓				ONLY ONE POLICE/FIRE DEPT. TO RESPOND.
			a)3)	3) Agreements with State emergency response teams, emergency response contractors and equipment suppliers? Yes ___ No ___ N/A ___				OPERATOR HAS DETERMINED THAT ON SITE PERSONNEL IS ADEQUATE AT THIS TIME.
			a)4)	4) Arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illnesses which could result from fires, explosions or releases at the facility? Yes ✓ No ___ 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

Area	Cl	90 Day F/U	Key Ltr Sub-sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
				Part 725				
				INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES				
				Subpart D Contingency Plan and Emergency Procedures				
OTH	1			Section 725.151 Purpose and Implementation of Contingency Plan	✓			
			a)	Is the plan designed to minimize hazards to human health or the environment from fires, explosions or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil or surface waters? Yes ✓ No ___				
			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 ✓				PLAN HAS NOT BEEN IMPLEMENTED.
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 ___ 3) Unplanned sudden or non-sudden releases of hazardous waste or hazardous waste constituents to air, soil or surface water? Yes ✓ No ___				

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Area	Cl	Day F/U	Key Ltr Sub-sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Numbe
			c)	Does the plan describe the arrangements agreed to by:				
				1) Local police and fire departments? Yes ✓ No ___				
				2) Hospitals? Yes ✓ No ___			✓	
				3) Contractors? Yes ___ No ___			✓	
				4) State and local emergency response teams? Yes ___ No ___				
			d)	Does the plan list the names, addresses and phone number (office and home) of all personnel qualified to act as emergency coordinators? Yes ✓ No ___				
			d)	Is the list of emergency coordinators up-to-date? Yes ✓ No ___				
			d)	If more than one person is designated as an emergency coordinator is a primary coordinator identified? Yes ✓ No ___				
			e)	Does the Plan identify:				
				1) All emergency equipment at the facility to include a physical description of the equipment? Yes ✓ No ___				
				2) A brief outline of the capability of each piece of emergency equipment? Yes ✓ No ___				
				3) The location of each piece of emergency equipment? Yes ✓ No ___				
			e)	Is the list of emergency equipment up-to-date? Yes ✓ No ___				

Area	Cl	90 Day F/U	Key Ltr / Sub-sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
			f)	Does the plan include an evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? Yes ✓ No ___				
			f)	Does the plan identify the signal to be used to begin evacutation? Yes ✓ No ___				
			f)	Are alternate evacuation routes identified? Yes ✓ No ___				
OTH	2			Section 725.153 Copies of Contingency Plan	✓			
				Has a copy (and all revisions) of the contingency plan:				
			a)	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 ___				
OTH	2			Section 725.154 Amendment of Contingency Plan	✓			
				Has the contingency plan been reviewed, and if necessary, amended whenever:				
			a)	1) Applicable regulations are revised? Yes ✓ No ___				
			b)	2) The plan fails in an emergency? Yes ___ No ___ N/A ✓				PLAN HAS NOT BEEN IMPLEMENTED

Area	Cl	90 Day F/U	Key Ltr Sub-sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
			c)	3) The facility changes - in its design, construction, operation, maintenance or other circumstances - in a way that materially increases the potential for fires, explosions, or releases of hazardous waste or hazardous waste constituents or changes the response necessary in an emergency? Yes ✓ No ___ N/A ___				
			d)	4) The list of emergency coordinators changes? Yes ✓ No ___				
			e)	5) The list of emergency equipement changes? Yes ✓ No ___				
OTH	2			Section 725.155 Emergency Coordinator	✓			
				Is there an emergency coordinator on site or on call at all times? Yes ✓ 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 or 2			Section 725.156 Emergency Procedures			✓	
				Has the facility had a release, fire or explosion? Yes ___ No ___				

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Area	Cl	C Day F/U	Key Ltr Sub-sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
				Note: If the answer is "No" check N/A. If the answer is "Yes", explain in detail the incident and how the facility did or did not follow the procedures prescribed in this section. Review the requirements while completing the explanation. If the company failed to meet one or more of the requirements, check "No" in the Apparent Compliance column.				

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Area	Cl	90 Day F/U	Key Ltr Sub-sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
				Part 725				
				INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES				
				Subpart E Manifest System, Recordkeeping and Reporting				
OTH	1			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".				
				For each manifest reviewed, did the facility:				
			a)1)	1) Sign and date each copy to certify that the hazardous waste covered by the manifest was received? Yes ✓ No ___				
			a)2)	2) Note any significant discrepancies in the manifest or each copy of the manifest? Yes ___ No ___ N/A ✓				NO SIGNIFICANT DISCREPANCIES
			a)3)	3) Immediately give one copy of the completed manifest to the transporter? Yes ✓ No				
			a)4)	4) Within 30 days after delivery, send one copy of the manifest to the generator and one copy to the Agency? Yes ✓ No ___				

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Area	Cl	90 Day F/U	Key Ltr Sub-sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
			a)5)	5) Retain a copy of the manifest at the facility for a period of three years from the date of delivery of the waste? Yes ✓ No ___				
			b)	Has the facility followed the procedures prescribed in 725.171 (b) for rail or water (bulk shipments) of hazardous waste? Yes ___ No ___			✓	NO BULK SHIPMENTS
				Does the facility initiate shipments of hazardous waste? Yes ✓ No ___				
				Note: If the answer is "Yes", the facility is also a generator of hazardous waste. Complete the generator checklist.				
				Section 725.172 Manifest Discrepancies				
				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".				
			d)	Has the owner or operator attempted to resolve significant discrepancies in quantity or type (i.e. variations in weight of 10% or more, variations in piece count of one container per truckload, obvious differences which can be discovered by inspection or waste analysis such as waste solvent substituted for waste acid) upon their discovery? Yes ___ No ___			✓	NO SIGNIFICANT DESCREPANCIES
			d)	If the discrepancy is not resolved within 15 days after receiving the waste, has the				

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Area	Cl	9 Day F/U	Key Ltr Sub-sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
				owner or operator submitted to the Agency a letter describing the discrepancy and the attempts made to reconcile it and a copy of the manifest or shipping paper at issue? Yes ___ No ___				
OTH	2			Section 725.173 Operating Record	✓			
			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 ___				
				Does the operating record contain the following information?				
			b)1)	1) A description of and quantity of each hazardous waste received at the TSD facility (whether from on or off-site generation)? Yes ✓ No ___				
			b)1)	2) A record of the method(s) and date(s) of its treatment, storage, or disposal as required by Appendix I? Yes ✓ No ___				
			b)2)	3) The location of each hazardous waste within the facility? Yes ✓ No ___				
			b)2)	4) The quantity of each hazardous waste at each location withing the facility? Yes ✓ No ___				
			b)2)	5) For disposal facilities, a map recording the location and quantity of hazardous waste in each cell or disposal area? Yes ___ No ___ N/A ✓				NO DISPOSAL ACTIVITY

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Area	Cl	F/U	Key Ltr / Sub-sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Numbe.
			b)2)	6) A cross reference by manifest number to location and quantity of hazardous waste? Yes ✓ No ___ N/A___				
			b)3)	7) Records and results of waste analyses and trial test performed as specified in Sections:				
				- 725.113 (Gen. Waste Analysis) Yes ✓ No ___				WASTE TREATED IS NOT SUBSTANTIALLY DIFFERENT
				- 725.293 (Tanks) Yes___ No___ N/A ✓				
				- 725.325 (Surface Improvements) Yes ___ No ___ N/A ✓				
				- 725.352 (Waste Piles) Yes___ No ___ N/A ✓				
				- 725.373 (Land Treatment) Yes ___ No ___ N/A ✓				
				- 725.441 (Incinerators) Yes ___ No ___ N/A ✓				
				- 725.475 (Thermal Treatment) Yes ___ No ___ N/A ✓				
				- 725.502 (Chem., Phys., Bio. Treatment) Yes ___ No ___ N/A ✓				
			b)4)	8) Summary reports and details of all incidents that require the implementation of the contingency plan as specified in Section 725.156(j)? Yes ___ No ___ N/A ✓				PLAN HAS NOT BEEN IMPLEMENTED.
			b)5)	9) Records and results of inspections as required by Section 725.115(d)? Yes ✓ No ___				

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44

Area	Cl	9. Day F/U	Key Ltr Sub-sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
				Note: The above information need only be kept for three years. This period would automatically be extended during any unresolved enforcement action.				
			b)6)	10. Monitoring, testing or analytical data where required by Sections: - 725.190 (G.W. Monitoring) Yes__ No__ N/A ✓ - 725.194 (G.W. Monitoring) Yes__ No__ N/A ✓ - 725.376 (Land Treatment) Yes__ No__ N/A ✓ - 725.378 (Land Treatment) Yes__ No__ N/A ✓ - 725.380 (d)(1) (Land Treatment) Yes__ No__ N/A ✓ - 725.447 (Incinerators) Yes__ No__ N/A ✓ - 725.477 (Thermal Treatment) Yes__ No__ N/A ✓ Note: Data required under 725.194 must be kept thoughout the post-closure period.				NO ACTIVITY REQUIRING.
			b)7)	11) All closure cost estimates required by Section 725.242? Yes ✓ No __				
			b)7)	12) All post-closure cost estimates for disposal facilities required for Section 725-244? Yes __ No__				NO DISPOSAL ACTIVITY.

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45

Area	Cl	5 Day F/U	Key Ltr Sub-sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
OTH	2			Section 725.174 Availability, Retention and Disposition of Records	✓			
			a)	During the inspection were all existing records, including plans, required under this Part furnished upon request and made available at all reasonable times for inspection as required by this Section? Yes ✓ No ___				
			c)	Upon closure of a waste disposal facility did the owner or operator submit a copy of the record of waste disposal location(s) and quantities to: - The Agency? Yes ___ No ___ - The local land authority? Yes ___ No ___ N/A ___			✓	NO CLOSURE ACTIVITY
			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
OTH	2			Section 725.175 Annual Report	✓			
				Has the owner or operator prepared and submitted a copy of an annual report, supplied by the Agency, to the Agency by March 1 for the preceding calendar year? Yes ✓ No ___ N/A ___				

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Area	Cl	Day F/U	Key Ltr Sub-sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
OTH	1			Section 725.176 Unmanifested Waste Report	✓			
				Does the facility accept hazardous waste from off-site ? Yes ✓ No ___				
				Note: If the answer is "Yes", complete this section. If the answer is "No", check "N/A".				
				Has the facility accepted hazaradous waste from an off-site source for treatment, storage or disposal without an accompanying manifest for shipping paper? Yes ___ No ✓			✓	NO WASTES 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 ___			✓	
				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 ___				
				Did the owner or operator submit the unmanifested waste report to the Agency within 15 days of receiving the waste? Yes ___ No ___				

Area	Cl	9 Day F/U	Key Ltr Sub-sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
OTH	2			Section 725.177 Additional Reports			✓	NO ACTIVITY REQUIRING ADDITIONAL REPORTS
				Has the owner or operator submitted to the Agency, as required, reports concerning:				
			a)	1) Releases, fires, explosions as specified in Section 725.156? Yes ___ No___ N/A ___				
			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 ___				

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48

Area	C1	90 Day F/U	Key Ltr Sec.	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
				Part 725				
				INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES				
				Subparts G & 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 —				
			d)	Was the closure plan submitted to the Agency within the time frames specified below:				NO CLOSURE ACTIVITY
				— 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 only tank(s), container storage or in-				

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49

Area	Cl	90 Day F/U	Key Ltr Sub-Sec.	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
				cinerator 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, land fill or land treatment unit which also has an approved closure plan? Yes — No — N/A —				
				— No later than 15 days after termination of interim status (unless a full operating permit was issued simultaneously)? Yes — No — N/A —				
				— No later than 15 days after issuance of a judicial decree or Board order to cease receiving hazardous waste or close? Yes — No — N/A —				
CLO	1			Section 725.218 Post Closure Plan	—	—	✓	NO ACTIVITY REQUIRING POST CLOSURE PLAN
			b)	Was the most current facility post-closure plan available during the inspection? yes — No —				
			e)	Was the post-closure plan submitted to the Agency within the time frames established in this subsection? Yes — No — N/A —				

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50

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Area	Cl	90 Day F/U	Key Ltr Sub-sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
FIN	1			Section 725.242 Cost Estimate For Facility Closure Has the facility prepared a written estimate of the cost of closing the facility in accordance with the closure plan as specified in Section 725.212? Yes ✓ No ___	✓			
FIN	1			Section 725.244 Cost Estimate For Post-Closure Care Has the facility prepared a written estimate of the annual cost of post-closure monitoring and maintenance of the facility? Yes ___ No ___ N/A ___			✓	NO ACTIVITY REQUIRING POST CLOSURE CARE.

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Area	Cl	9 Day F/U	Key Ltr Sub-sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
				Part 725				
				INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES				
				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? Yes ✓ No ___ N/A ___				
OTH	1	X		Section 725.272 Compatibility of Waste with Container	✓			
				Is the owner or operator using containers made of or lined with materials which will not react with and are otherwise compatible with the hazardous waste to be stored so that the ability of the container to contain the waste is not impaired? Yes ✓ No ___				
OTH	1	X		Section 725.273 Management of Containers	✓			
			a)	Are containers of hazardous waste always closed during storage? Yes ✓ No ___				

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Area	Cl	5 Day F/U	Key Ltr Sub-sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
			b)	Are containers of hazardous waste being opened, handled or stored in manner which will prevent the rupture of the container or prevent it from leaking? Yes ✓ No ___				
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 ___				
				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 reactibe waste located at least 50 feet from the property line? Yes ✓ No ___				
OTH	1	X		Section 725.277 Special Requirements for Incompatible Wastes			✓	NO INCOMPATABLES
				Is the owner complying with the requirements concerning the management of incompatible wastes or incompatible wastes and materials contained in this Section? Yes ___ No ___				

Area	Cl	Day F/U	Key Ltr / Sub-sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
				Part 725				
				INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES				
				Subpart J — Tanks				
OTH	1	X		Section 725.292 — General Operating Requirements	✓			
			a)	Is the treatment or storage of hazardous wste in tanks in compliance with Section 725.117(b) (General Requirements for Ignitable, Reactive or Incompatible Wastes) ? Yes ✓ No ___ N/A ___				
			b)	Are only hazardous wastes or treatment reagents being placed in a tank which will not cause the tank or its inner liner to rupture, leak, corrode or otherwise fail before the end of its intended life? Yes ✓ No ___				
			c)	Are uncovered tanks being operated:				NO UNCOVERED TANKS
				- With two feet of free board? Yes ___ No ___				
				- With a containment structure, a drainage control system or a diversion structure with a capacity that equals or exceeds the volume of the top two feet of the tank? Yes ___ No ___				
			d)	Is a tank which has a continuous feed of hazardous waste into it equipped with a means to stop this inflow? Yes ✓ No ___				

Area	Cl	90 Day F/U	Key Ltr / Sub-sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
OTH	1			Section 725.293 Waste Analysis and Trial Tests	✓			
				Prior to using a tank to chemically treat or store a hazardous waste which is substantially different from the waste previously treated or stored in the tank, or chemically treat hazardous waste with process substantially different from any process previously used in that tank, has the owner or operator?				
			b)1)	1) Conducted waste analyses and trial treatment or storage tests to show that the treatment or storage will meet the requirements of Section 725.292 (a) and (b)? Yes ✓ No ___ N/A ___				
			b)2)	2) Obtained written documented information on similar storage or treatment of similar wastes under similar operating conditions to show that the treatment or storage will meet the requirements of Section 725.292 (a) and (b)? Yes ✓ No ___ N/A ___				
OTH	2			Section 725.294 Inspections	✓			
				Is the owner or operator inspecting, where present:				
			a)	1) Discharge control equipment at least once each operating day to ensure that it is in good working order? Yes ✓ No ___ N/A ___				
			b)	2) Data gathered from monitoring equipment at least once each operating day to ensure that the tank is being operated according to its design? Yes ✓ No ___ N/A ___				

Area	Cl	90 Day F/U	Key Ltr Sub-sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
			c)	3) The level of the waste in the tank at least once each operating day to ensure compliance with Section 725.292 (c)? Yes ✓ No ___				
			d)	4) The construction materials of the tank at least once each week to detect corrosion or leaking of fixtures or seams? Yes ✓ No ___				
			e)	5) The construction materials of, and the area immediately surrounding discharge confinement structures at least weekly to detect erosion or obvious signs of leakage? Yes ✓ No ___ N/A ___				
				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.				
CLO	1			Section 725.297 Closure	___	___	✓	NO CLOSURE ACTIVITY.
				Have all hazardous wastes and hazardous waste constituents ben removed from tanks, discharge control equipment and discharge confinement structures at the completion of closure? Yes ___ No ___				
				Note: Determine compliance or non-compliance with this section only in conjunction with a closure verification inspection conducted after the facility and its independent registered professional engineer have certified closure in accordance with an approved closure plan.				

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56

Area	Cl	90 Day F/U	Key Ltr Sub-sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
OTH	1			Section 725.298 Special Requirements for Ignitable or Reactive Wastes				
			a)	Have ignitable or reactive wastes been treated, rendered or mixed before or immediately after placement in a tank so that: 1) The resulting waste mixture and dissolution of material no longer meets the definition of ignitable or reactive waste under Section 721.121 or 721.123? Yes ____ No ✓ N/A____				
				2) Section 725.117(b) is complied with. Yes ✓ No____ N/A____				
			a)	Is the waste stored or treated in such a way that it is protected from any material or conditions which may cause the waste to ignite or react? Yes ✓ No____ N/A____				
			a)	Is ignitable or reactive waste placed in a tank that is used solely for emergencies? Yes ____ No ✓ N/A____				
			b)	Is the owner or operator complying with the buffer zone requirements for tanks contained in Table 1-2 through 2-6 of the NFPA "Flammable and Combustible Liquids Code" for covered tanks in which ignitable or reactive wastes are treated or stored? Yes ✓ No____ N/A____				
				Note: For each tank in which ignitable or reactive waste is treated or stored provide the following information: 1) Tank capacity in gallons. 2) Tank diameter in feet. 3) Distance of tank from property line in feet. >50' TSD-J-4				SEE ATTACHMENT # 1

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57

Area	Cl	5.. Day F/U	Key Ltr Sub-sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
OTH	1			Section 725.299 Special Requirements for Incompatible Wastes			✓	NO INCOMPATABLES
				Is the owner or operator complying with the requirements concerning the management of incompatible wastes or incompatible wastes and materials contained in this section? Yes _____ No _____				

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(If Applicable)

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RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS
TREATMENT, STORAGE, AND DISPOSAL FACILITIES
Form A - General Facility Standards

I. General Information:

(A) Facility Name: Custom Organics, Inc.

(B) Street: 1445 W. 42nd Street

(C) City: Chicago (D) State: IL (E) Zip Code: 60609

(F) Phone: 312/247-2828 (G) County: Cook

(H) Operator: Custom Organics, Inc.

(I) Street: 1445 W. 42nd Street

(J) City: Chicago (K) State: IL (L) Zip Code 60609

(M) Phone: 312/247-2828 (N) County: Cook

(O) Owner: Custom Organics, Inc.

(P) Street: 1445 W. 42nd Street

(Q) City: Chicago (R) State: IL (S) Zip Code: 60609

(T) Phone: 312/247-2828 (U) County: Cook

(V) Date of Inspection: 1/4/85 (W) Time of Inspection (From) 9:45am (To) 1:00pm

(X) Weather Conditions: Sunny 30°F

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Rev. 3-6-81/J.B.

(Y) Person(s) Interviewed	Title	Telephone
Mr Abid Bengali	General Mgr	312/247-2828
Mr. James Ostrowski	Marketing Mgr	312/247-2828

(Z) Inspection Participants	Agency/Title	Telephone
Clifford Gould	IEPA/EPS	312/345-9780

(AA) Preparer Information

Name	Agency/Title	Telephone
Clifford Gould	IEPA/EPS	312/345-9780

II. SITE ACTIVITY:

Complete sections I through VII for all treatment, storage, and/or disposal facilities. Complete the forms (in parenthesis) in section VIII corresponding to the site activities identified below:

X A. Storage and/or Treatment
1. Containers (I)
2. Tanks (J)
3. Surface Impoundments (K)
4. Waste Piles (L)

___B. Land Treatment (M)

___C. Landfills (N)

___D. Incineration and/or Thermal Treatment (O and P)

___E. Chemical, Physical, and Biological Treatment (Q)

Note: If facility is also a generator or transporter of hazardous waste complete sections IX and X of this form as appropriate.

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III. GENERAL FACILITY STANDARDS:
(Part 265 Subpart B)

	Yes	No	NI*	Remark
(A) Has the Regional Administrator been notified regarding:				
1. Receipt of hazardous waste from a foreign source?		X		None received
2. Facility expansion?		X		Part of a 200-300% increase in plant capacity has been completed. However, only non listed Subpart C material is being handled there at this time. Additionally, it is the distillation capacity which is being increased, not the storage capacity.
(B) General Waste Analysis:				
1. Has the owner or operator obtained a detailed chemical and physical analysis of the waste?	X			
2. Does the owner or operator have a detailed waste analysis plan on file at the facility?	X			
3. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?	X			
(C) Security - Do security measures include: (if applicable)				
1. 24-Hour surveillance?	X			
2. Artificial or natural barrier around facility?	X			
3. Controlled entry?	X			
4. Danger sign(s) at entrance?	X			
(D) Do Owner or Operator Inspections Include:				
1. Records of malfunctions?	X			Found in the production log
2. Records of operator error?	X			In the production log and Cost anal. sheets
3. Records of discharges?			X	No discharge

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	Yes	No	NI*	Remarks
4. Inspection schedule?	X	---	---	
5. Safety, emergency equipment?	X	X	---	Have logs & schedules
6. Security devices?	X	X	---	but these have not
7. Operating and structural devices?	X	X	---	been implemented
8. Inspection log?	X	X	---	
(E) Do personnel training records include: (Effective 5/19/81)				
1. Job titles?	X	---	---	
2. Job descriptions?	---	X	---	
3. Description of training?	X	---	---	
4. Records of training?	---	X	---	
5. Have facility personnel received required training by 5-19-81?	---	X	---	
6. Do new personnel receive required training within six months?	---	X	---	
(F) If required are the following special requirements for ignitable, reactive, or incompatible wastes addressed?				
1. Special handling?	X	---	---	
2. No smoking signs?	X	---	---	
3. Separation and protection from ignition sources?	X	---	---	

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IV. PREPAREDNESS AND PREVENTION:
(Part 265 Subpart C)

	Yes	No	NI*	Remarks
(A) Maintenance and Operation of Facility:				
Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent?		X		
(B) If required, does the facility have the following equipment:				
1. Internal communications or alarm systems?	X			
2. Telephone or 2-way radios at the scene of operations?	X			
3. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?	X			

Indicate the volume of water and/or foam available for fire control:

City water

	Yes	No	NI*	Remarks
(C) Testing and Maintenance of Emergency Equipment:				
1. Has the owner or operator established testing and maintenance procedures for emergency equipment?	X			
2. Is emergency equipment maintained in operable conditions?	X			
(D) Has owner or operator provided immediate access to internal alarms? (if needed)	X			

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(E) Is there adequate aisle space for unobstructed movement? ___ X ___ _____

V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES:
(Part 265 Subpart D)

(A) Does the Contingency Plan contain the following information:	Yes	No	NI*	Remarks
1. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.)	X			
2. Arrangements agreed by local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?		X		Done but not documented.
3. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?	X			
4. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?	X			
5. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)	X			

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	Yes	No	NI*	Remarks
(B) Are copies of the Contingency Plan available at site and local emergency organizations?	X			But not documented to local emergency agency
(C) Emergency Coordinator				
1. Is the facility Emergency Coordinator identified?	X			
2. Is coordinator familiar with all aspects of site operation and emergency procedures?	X			
3. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	X			
(D) Emergency Procedures				
If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56?			X	No emergency

VI. MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING
(Part 265 Subpart E)

	Yes	No	NI*	Remarks
(A) Use of Manifest System				
1. Does the facility follow the procedures listed in §265.71 for processing each manifest?	X			
2. Are records of past shipments retained for 3 years?	X			
(B) Does the owner or operator meet requirements regarding manifest discrepancies?	X			

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(C) Operating Record

1. Does the owner or operator maintain an operating record as required in 265.73?	X			
2. Does the operating record contain the following information:				
**b. The method(s) and date(s) of each waste's treatment, storage, or disposal as required in Appendix I?	X			
c. The location and quantity of each hazardous waste within the facility?	X			
~~***d. A map or diagram of each cell or disposal area showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)~~				
e. Records and results of all waste analyses, trial tests, monitoring data, and operator inspections?	X			
f. Reports detailing all incidents that required implementation of the Contingency Plan?			X	None required at time of inspection
g. All closure and post closure costs as applicable? (Effective 5-19-81)	X			

** See page 33252 of the May 19, 1980, Federal Register.

*** Only applies to disposal facilities

JAN 16 1985

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VII. CLOSURE AND POST CLOSURE
(Part 265 Subpart G)

	Yes	No	NI*	Remarks
(A) Closure and Post Closure				
1. Is the facility closure plan available for inspection. ~~by May 19, 1981?~~	X			
2. Has this plan been submitted to the Regional Administrator		X		
3. Has closure begun?		X		
4. Is closure estimate available. ~~by May 19, 1981?~~	X			
(B) Post closure care and use of property				
Has the owner or operator supplied a post closure monitoring plan? (effective by May 19, 1981)			X	Not required

VIII. FACILITY STANDARDS
(Part 265, Subparts I thru R)

I
USE AND MANAGEMENT OF CONTAINERS

Facility Name: _____ Date of Inspection: _____

	Yes	No	NI*	Remarks
1. Are containers in good condition?	X			
2. Are containers compatible with waste in them?	X			
3. Are containers stored closed?	X			
4. Are containers managed to prevent leaks?		X		Evidence of two leakin containers in drum Storage area.
5. Are containers inspected weekly for leaks and defects?		X		
6. Are ignitable & reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive.)	X			

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	Yes	No	NI*	Remarks
7. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply.)			X	No incompatable wastes
8. Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?			X	No incompatable wastes

J
TANKS

Facility Name: _____ Date of Inspection: _____

1. Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank?	X			
2. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containement structures?			X	No uncovered tanks
3. Do continuous feed systems have a waste-feed cutoff?			X	No continuous feed
4. Are waste analyses done before the tanks are used to store a substantially different waste than before?			X	Only similar wastes stored.
5. Are required daily and weekly inspections done?		X		
6. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)	X			Ignitable protected from ignition
7. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR 265.17(b) apply.)			X	No incompatable

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	Yes	No	NI*	Remarks

8. Has the owner or operator observed the National Fire Protection Association's buffer zone requirements for tanks containing ignitable or reactive wastes? yes

   Tank capacity: multiple tanks gallons

   Tank diameter: _____ feet

   Distance of tank from property line _____ feet

   (See table 2 - 1 through 2 - 6 of NFPA's "Flammable and Combustible Liquids Code - 1977" to determine compliance.)

K
~~SURFACE IMPOUNDMENTS~~

Facility Name: _____ Date of Inspection: _____

	Yes	No	NI*	Remarks
1. Do surface impoundments have at least 60 cm (2 feet) of freeboard?				
2. Do earthen dikes have protective covers?				
3. Are waste analyses done when the impoundment is used to store a substantially different waste than before?				
4. Is the freeboard level inspected at least daily?				
5. Are the dikes inspected weekly for evidence of leaks or deterioration?				
6. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a surface impoundment? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)				
7. Are incompatible wastes stored in different impoundments? (If not, the provisions of 40 CFR ~~265.17(b) apply~~.)				

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	Yes	No	NI*	Remarks
~~3. Has the owner or operator addressed~~ the waste analysis requirements of 265.402?	___	___	___	_____
4. Are inspection procedures followed according to 265.403?	___	___	___	_____
5. Are the special requirements fulfilled for ignitable or reactive wastes?	___	___	___	_____
6. Are incompatible wastes treated? (If ~~yes, 265.17(b) applies.)~~	___	___	___	_____

Note: EPA has temporarily suspended the applicability of the requirements of the hazardous waste regulations in 40 CFR Parts 122, 264 and 265 to owners and operators of (1) wastewater treatment tanks that receive, store, and treat wastewaters that are hazardous waste or that generate, store or treat a wastewater treatment sludge which is a hazardous waste where such wastewaters are subject to regulation under Sections 402 or 307(b) of the Clean Water Act (33 U.S.C. 1251 et seq.) and (2) neutralization tanks, transport vehicles, vessels, or containers which neutralize wastes which are hazardous only because they exhibit the corrosivity characteristic under 40 CFR §261. or are listed as hazardous wastes in Subpart D of 40 CFR Part 261 only for this reaso

IX

Complete this section if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

1. MANIFEST REQUIREMENTS

	Yes	No	NI*	Remarks
(A) Does the operator have copies of the manifest available for review?	X	___	___	_____
(B) Do the manifest forms reviewed contain the following information: (If possible, make copies of, or record information from, manifest(s) that do not contain the critical elements)				
1. Manifest document number?	X	___	___	_____
2. Name, mailing address, telephone number, and EPA ID Number of Generator	X	___	___	_____

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	Yes	No	NI*	Remarks
3. Name and EPA ID Number of Transporter(s)?	X			
4. Name, address, and EPA ID Number of Designated permitted facility and alternate facility?	X			
5. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	X			
6. The total quantity of waste(s) and the type and number of containers loaded?	X			
7. Required certification?	X			
8. Required signatures?	X			
(C) Does the owner or operator submit exception reports when needed?			X	None required

2. PRE-TRANSPORT REQUIREMENTS

	Yes	No	NI*	Remarks
(A) Is waste packaged in accordance with DOT Regulations? (Required prior to movement of hazardous waste off-site)			X	No waste ready for transport at time of inspection
(B) Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required to movement of hazardous waste off-site)			X	
(C) If required, are placards available to transporters of hazardous waste?			X	

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[illegible]

VI. RECORDKEEPING and REPORTING
(Part 262, Subpart D)

	Yes	No	NI*	Remarks
(A) Are Manifests, Annual Reports, Exception Reports, and all test results and analyses retained for at least three years?	X			No exception reports required
(B) Has the generator submitted Annual Reports and Exception Reports as required?	X			No exception reports required

VII. INTERNATIONAL SHIPMENTS
(Part 262, Subpart E)

Has the installation imported or exported Hazardous Waste?		X		

(If answered Yes, complete the following as applicable.)

1. Exporting Hazardous waste, has a generator:				
a. Notified the Administrator in writing?				N/A
b. Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country?				N/A
c. Met the Manifest requirements?				N/A
2. Importing Hazardous Waste, has the generator:				
Met the manifest requirements?				N/A

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*Not Inspected

REMARKS

Use this section to briefly describe site activities observed at the time of the inspection. Note any possible violations of Interim Status Standards.

This was the annual inspection of a facility on the major site list.

Custom organics receives waste from customers, distilles it and returns the purified material to the customer. The facility handles both Subpart C and Subpart D waste. Waste is stored in drums and tanks prior to distillation. Still bottoms are removed from the facility using the manifest/SWH procedure.

During the inspection, the following apparent violations were observed:

-725.115 Scheduled inspections are not being done/recorded in an inspection log.

-725.116 Job descriptions and records of training are not being maintained.

-725.137 Arrangements with local emergency agencies have not been documented.

-725.271 Evidence of two leaking containers in the drum storage area

-725.274 Required inspections are not being done.

-725.294 Required inspections are not being done.

-725.135 Adequate aisle space was not being maintained in the drum storage area

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FOS

RCRA LAND DISPOSAL RESTRICTION INSPECTION

Facility: Safety Kleen Corp. Chgo RC (Safety-Kleen Corp)

U.S. EPA I.D. No.: ILD005450697 0316000053

Street: 1445 W. 42nd Street

City: Chicago **State:** IL **Zip Code:** 60609

Telephone: 312/650-1467

Operator: Safety-Kleen Corp.

Street: 1445 W. 42nd Street

City: Chicago **State:** IL **Zip Code:** 60609

Telephone: 312/650-1467

Owner: Safety-Kleen Corp.

Street: 777 Big Timber Rd.

City: Elgin **State:** IL **Zip Code:** 60123

Telephone: 312/697-8460

Inspection Date: 7/25/89 **Time:** 9:30am-12:15pm **Weather Conditions:**

	Name	Affiliation	Telephone
Inspectors:	John Maher	IEPA	312/345-9780

Facility Representatives:	Tom Hellstrom	312/650-1467
	Alfred Aghaiepour	312/650-1467
	Desi Chowi	312/697-8460

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

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AUG 11 1989
IEPA-DLPC

Revised 9-26-88

IL 532-1739
LPC 296 11/88

INSPECTION SUMMARY

Safety-Kleen Corp. reclaims spent solvent that is received from off-site generators. They employ several processes: distillation, fractionation and liquid-liquid extraction. As a result of their activities, they are also generators of hazardous waste - still bottoms from recovering the solvent. The solvents handled at this site include D001 and F001 through F005.

This site is currently out of compliance with 725.293(a) - storing hazardous waste in tanks that have inadequate secondary containment (there is no coating on the surface of the secondary containment). However, a Pre-enforcement Conference was held between this site and IEPA, and an agreement was made that would bring the site back in to compliance by approximately September 1, 1989.

Regarding land disposal restrictions (regulations), at the time of the inspection no apparent violations were observed.

RCRA LAND DISPOSAL RESTRICTION INSPECTION

GENERATOR CHECKLIST

GENERATOR REQUIREMENTS

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

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

   X Yes ____ No ____ NA

   If yes, check the appropriate treatability group.

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

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

   a. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 50 but less 500 ppm, is the treatment in accordance with existing TSCA thermal treatment regulations for burning in high efficiency boilers (40 CFR 761.60) or incineration (40 CFR 761.70)? N/A - No PCBs

   ____ Yes ____ No ____ NA

   If yes, specify the method: _____

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

   ____ Yes ____ No ____ NA

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

   _____
   _____
   _____

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

____ Yes ____ No X NA No First Third Waste.

If yes, check the appropriate treatability group.

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

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

Waste Code	Wastewater	Nonwastewater

B. **Waste Analysis**

1. F-Solvent Wastes

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

X Yes ____ No ____ NA

How was this determination made?

- Knowledge of waste

X Yes ____ No

If yes, is any supporting data available for review? Describe how this is adequate. Waste is spent listed Solvent

- TCLP

____ Yes X No

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

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

X Yes ____ No ____ NA

If yes, specify the waste stream: Spent list solvent F001-F005

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

____ Yes X No ____ NA

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

All incoming and outgoing shipments are analyzed.

2. California List Wastes

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

____ Yes X No ____ NA Paint Filter test is not necessary. waste is a liquid.

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

____ Yes ____ No X NA

What type of absorbent is used? _____

Check the types of waste to which absorbent is added.

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

____ Liquid hazardous waste containing metals

____ Liquid hazardous waste containing free cyanides

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

- Knowledge of wastes

X Yes ____ No ____ NA

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

- Testing

X Yes ____ No ____ NA

If yes, list test method used: GC Scan for list solvents F001-F005

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

____ Yes ____ No X NA

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

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

____ Yes X No ____ NA

3. First Third Wastes:

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

____ Yes ____ No X NA

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

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

____ Yes ____ No ____ Soft hammer

If yes, specify the waste stream: ____

How was this determination made?

- Knowledge of waste

____ Yes ____ No

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

- TCLP

____ Yes ____ No ____ NA

- Total Constituent Analysis

____ Yes ____ No ____ NA

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

_____

_____

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

____ Yes ____ No ____ NA

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

_____

_____

_____

C. <u>Management</u>

1. On-Site Management

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

X Yes ____ No

If yes, the TSD Checklist must be completed.

2. Off-Site Management

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

X Yes ____ No

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

X Yes ____ No

c. Does notification contain the following?

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

Identify off-site treatment or storage facilities: Safety-Kleen IS Dalton, IL and Clarkesville, MO

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

____ Yes X No

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

____ Yes ____ No

f. Does notification contain the following?

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

Identify off-site land disposal facilities: _____

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

____ Yes X No ____ NA

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

____ Yes ____ No

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

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

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

X Yes ____ No

D. **Demonstration and Certification -- "Soft Hammer" Wastes** No "Soft Hammer" Wastes

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

____ Yes ____ No

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

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

Attach a copy of the demonstration and certification

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

____ Yes ____ No

If yes, attach a copy of written discussion.

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

_____ Yes _____ No

Describe the type of treatment and treatment facilities _____

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

_____ Yes _____ No

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

_____ Yes _____ No

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

(i) EPA Hazardous waste number _____ Yes _____ No

(ii) Manifest number _____ Yes _____ No

(iii) Waste analysis data, if available _____ Yes _____ No

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

_____ Yes _____ No

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

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

X Yes _____ No

If yes, list types of waste treatment units and processes:
Still - distillation of listed Solvents

RCRA LAND DISPOSAL RESTRICTION INSPECTION

TSD CHECKLIST

TSD REQUIREMENTS

A. General Facility Standards

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

   o F-solvent ___X___ Yes ____ No ____ NA spent solvents

   o California List ___X___ Yes ____ No ____ NA spent solvents

   o First Third ____ Yes ____ No ___X___ NA

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

   ___X___ Yes ____ No

   a. What date was the waste analysis plan last revised? 11-9-88

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

   ___X___ On-site ____ Off-site

   Identify off-site lab: _____

   c. Is F-solvent waste analyzed using TCLP?

   ____ Yes ___X___ No ____ NA

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

   ____ Yes ____ No ___X___ NA

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

   e. Describe the frequency of sampling: Every incoming shipment

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

X Yes ____ No

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

1. Are restricted wastes stored on-site?

X Yes ____ No

If no, go to C, Treatment.

2. If yes, check the appropriate method.

X Tanks
X Containers

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

X Yes ____ No ____ NA

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

X Yes ____ No

5. Do operating records agree with container labeling?

X Yes ____ No ____ NA

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

X Yes ____ No

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

____ Yes X No ____ NA

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

____ Yes ____ No

If yes, state how: _____

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

X Yes ____ No ____ NA

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

X Yes ____ No

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

X Yes ____ No ____ NA

Operating record contains this information.

C. **Treatment**

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

X Yes ____ No

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

2. Describe the treatment processes: Distillation, fractionation and liquid-liquid extraction.

3. Does the facility, in accordance with an acceptable waste analysis plan, determine whether the residue or residue extract (for treatment standards expressed as concentrations in the waste extract) from all treatment processes is less than treatment standards [268.7(b)]?

X Yes ____ No

4. Is dilution used as a substitute for treatment?

____ Yes X No

6. Are notifications, demonstration, and certification (if applicable) prepared by the generators kept in the facility's operating record?

X Yes ____ No

7. Does the facility ship any waste or treatment residue that meets the treatment standards to an off-site disposal facility?

____ Yes X No ____ NA

If yes, does the treatment facility provide notification and certification to the disposal facility?

____ Yes ____ No

If yes, does notification contain the following?

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

Identify off-site disposal facilities: _____

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

____ Yes ____ No X NA

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

____ Yes ____ No

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

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

____ Yes X No

If no, go to E, Land Disposal.

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

____ Yes ____ No

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

____ Yes ____ No ____ NA

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

____ Yes ____ No

Attach test results.

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

____ Yes ____ No

6. Provide the frequency of analyses conducted on treatment residues: _____

_____

_____

7. Does the operating record adequately document the results of waste analyses performed in accordance with 268.41?

_____ Yes _____ No

8. Do the hazardous waste residues exceed the treatment standards (268.41) or do not meet the prohibition levels?

Sludge _____ Yes _____ No

Supernatant _____ Yes _____ No

a. If yes, are sludge and supernatant removed adequately on an annual basis?

_____ Yes _____ No

b. Are adequate precautions taken to protect liners, and do records indicate that liner integrity is inspected?

_____ Yes _____ No

c. Are residues subsequently managed in another surface impoundment?

_____ Yes _____ No

d. Are residues treated prior to disposal?

_____ Yes _____ No

If yes, are waste residues treated on-site or off-site?

_____ On-site _____ Off-site

Identify treatment method: _____

_____

_____

E. **Land Disposal**

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

   ____ Yes X No

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

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

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

   ____ Yes ____ No

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

   ____ Yes ____ No

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

   ____ Yes ____ No

   If yes, at what frequency? _____

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

   ____ Yes ____ No

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

   ____ Yes ____ No

7. Does the facility have notices [268.7(a)(3)] and records of disposal for disposed wastes that are subject to a national capacity variance, case-by-case extensions [268.5], or no migration petitions [268.6]?

____ Yes ____ No ____ NA

8. What is the volume of the restricted wastes disposed of to date?

_____

_____

9. If the facility has a case-by-case extension, is the facility making progress as described in progress reports?

____ Yes ____ No ____ NA

7. Does the facility have notices [268.7(a)(3)] and records of disposal for disposed wastes that are subject to a national capacity variance, case-by-case extensions [268.5], or no migration petitions [268.6]?

____ Yes ____ No ____ NA

8. What is the volume of the restricted wastes disposed of to date?

_____

_____

9. If the facility has a case-by-case extension, is the facility making progress as described in progress reports?

____ Yes ____ No ____ NA

ILD005450697
EPA IDENTIFICATION NUMBER

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS
TREATMENT, STORAGE, AND DISPOSAL FACILITIES
Form 1 - General Facility Standards

I. General Information:

(A) Facility Name: Custom Organics Inc
(B) Street: 1445 W. 42nd St
(C) City: Chicago (D) State: Ill (E) Zip Code: 60609
(F) Phone: (312) 247-2828 (G) County: Cook

(H) Operator: Mr. Gilbert Gann, Pres.
(I) Street: 1445 W. 42nd St
(J) City: Chicago (K) State: Ill (L) Zip Code: 60609
(M) Phone: (312) 247-2828 (N) County: Cook

(O) Owner: Custom Organics Inc.
(P) Street: 1445 W. 42nd St
(Q) City: Chicago (R) State: Ill (S) Zip Code: 60609
(T) Phone: (312) 247-2828 (U) County: Cook

(V) Type of Ownership: ___ Federal ___ Municipal ✓ Private ___ State ___ County

(W) Date of Inspection: 4/20/80 (Q) Time of Inspection (From) 2:25 (To) ___

(X) Weather Conditions: Sunny & Clear

(Y) Person(s) Interviewed	Title	Telephone
Mr. Gilbert Gavlin,	President	(312) 247-2828

(Z) Inspection Participants	Title	Telephone
Hak K. Cho	Env. Engr.	886-6143
Norm Niedergang	Env Engr.	886-6753
Charles Gabien	Env. specialist	345-9780

II. Description of Site Activity

(A) ____ Generator (Form 2)

(B) ✓ Transporter (Form 3)

(C) ✓ Chemical, Physical and Biological Treatment (Form 4)

(D) ✓ Storage (Form 5)

(E) ____ Landfill (Form 6)

(F) ____ Incineration (Form 7)

(G) ____ Land Treatment (Form 4)

(H) ____ Thermal Treatment (Form 7)

(I) Comments: _____

Supplemental forms (Listed in Parathesis) must be completed for each activity inspected. Attach all Supplemental forms to this report.

	Yes	No	Not Inspected	See Remark Number
(J) Has this facility Submitted a Part A Permit Application?	✓			

III. GENERAL FACILITY STANDARDS

	Yes	No	Not Inspected	See Remark Number
(A) Has the Regional Administrator been notified regarding:				
1. Receipt of hazardous waste from a foreign source?		✓		
2. Transfer of Ownership?		✓		
(B) General Waste Analysis:				
1. Has the owner or operator obtained a detailed chemical and physical analysis of the waste?				
2. Does the owner or operator have a detailed waste analysis plan on file at the facility?				
3. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?				
(C) Security - Do security measures include:				
1. 24-Hour Surveillance?	✓			
2. Artificial or Natural Barrier Around Facility?		✓		
3. Controlled Entry?	✓			
4. Danger Sign(s) at Entrance?				entrance to flame proof vault only
D) Do Owner or Operator Inspections Include:				
1. Records of Malfunctions?			✓	only log in [illegible]
2. Records of Operator Error?	✓			
3. Records of Discharges?	✓			
4. Inspection Schedule?		✓		
5. Safety, Emergency Equipment?	✓			
6. Security Devices?			✓	
7. Operating and Structural Devices?	✓			
8. Inspection Log?	✓			

II GENERAL FACILITY STANDARDS - ontinued

	Yes	No	Not Inspected	See Remark Number
(E) Do Personnel Training Records Include:				
1. Job Titles? description no	✓	✓		
2. Description of Training?				
3. Records of Training?			✓	
Is Personnel Training Completed within the Required Time Frame?			✓	
(F) Are the Following Special Requirements for Ignitable, Reactive, or Incompatible Wastes Addressed?				
1. Special Handling?	✓			
2. No Smoking Signs?	✓			
3. Separation and Confinement?			✓	

IV. PREPAREDNESS AND PREVENTION

(A) Maintenance and Operation of Facility:				
1. Is there any evidence of fire, Explosion, or release of hazardous waste or hazardous waste constituent?		✓		
(B) Does the Facility have the Following Equipment:				
1. Alarm System?		✓		
2. Telephone or 2-Way Radios?	✓			
3. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?	✓			

Indicate the volume of water and/or foam available for fire control:

Units: city water

$NaCO_3$ extinguishers

	Yes	No	Not Inspected	See Remark Number
4. Has Owner/Operator Provided Immediate Access to Internal Alarms (if needed)?	✓			
5. Is there adequate Aisle Space for unobstructed Movement? ?				
6. Are arrangements with local authorities included in the operating record?	✓			

(C) Contingency Plan and Emergency Procedure 265 Subp D

1. Does the contingency plan contain the following:

	Yes	No	Not Inspected	See Remark Number
a. The actions facility personnel must take to comply with §264.51 and 264.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part) — may be incomplete — not in 1 place	✓			
b. Arrangements agreed to by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services, pursuant to §264.37?		✓		not in plan
c. Names, addresses, and Phone numbers (office and Home) of all persons qualified to act as emergency coordinator.	✓			
d. A list of all emergency equipment at the facility which include the location and physical description of each item on the list, and a brief outline of its capabilities?		✓		
e. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes and alternate evacuation routes.		✓		

	Yes	No	Not Inspected	See Remark Number
5. If hazardous wastes accumulate on site, does the generator follow the following general facility standards?	_____	_____	_____	_____
A. Do Personnel training records include:				
1. Job Titles?	_____	_____	_____	_____
2. Description of Training?	_____	_____	_____	_____
3. Records of Training?	_____	_____	_____	_____
Is Personnel Training Completed within the Requried Time Frame?	_____	_____	_____	_____
B. Prepardness and Prevention 265 Subpt C.				
1. Maintenance and Operation of Facility:				
a. Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent?	_____	_____	_____	_____
2. Does the Facility have the following equipment?				
a. Alarm system?	_____	_____	_____	_____
b. Telephone or 2-Way Radios?	_____	_____	_____	_____
c. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?	_____	_____	_____	_____

Indicate the volume of water and/or foam available for fire control

Units: _____

_____

3. Testing and Maintenance of Emergency Equipment:				
a. Has the Owner or Operator established testing and Maintenance Procedures for Emergency Equipment	_____	_____	_____	_____
b. Is emergency equipment Maintained in Operable Condition?	_____	_____	_____	_____

VII. MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING

	Yes	No	Not Inspected	See Remark Number
(A) Use of Manifest System				
1. Does the facility follow the procedures listed in §265.71 for processing each Manifest?	✓			
2. Are records of past shipments retained for 3 years?	✓			
(B) Does the owner or operator meet requirements regarding Manifest Discrepancies?	✓			
(C) Operating Record				
Does the facility maintain an operating record at the site as required in §265.73?	✓			
(D) Availability, Retention and Disposition of Records				
Are all records available at the site for inspection as required in §265.74?	✓			

VIII. CLOSURE AND POST CLOSURE

	Yes	No	Not Inspected	See Remark Number
(A) Closure and Post Closure				
1. Closure Plan Available for Inspection by May 19, 1981?			✓	
2. Has this plan been submitted to the Regional Administrator?			✓	
3. Has Closure begun?			✓	
4. Is closure cost estimate available by May 19, 1981?			✓	
(B) Post Closure Care and Use of Property - Has the Owner or Operator supplied a Post Closure Monitoring Plan (by May 19, 1981)?			✓	

ILD005450697
EPA IDENTIFICATION NUMBER

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS
Form 3 - Transporter Inspection

N/A as of 11/19/80

I. General Information:

(A) Transporter Name: Custom Organic Inc
(B) Street: 1445 W. 42nd St
(C) City: Chicago (D) State: Ill (E) Zip Code: 60609
(F) Phone: (312) 247-2828 (G) County: Cook

(H) Operator: Gilbert Gavlin. Pres.
(I) Street: 1445 W. 42nd St
(J) City: Chicago (K) State: Ill (L) Zip Code: 60609
(M) Phone: (312) 247-2828 (N) County: Cook

(O) Owner: Custom Organics Inc
(P) Street: 1445 W. 42nd St
(Q) City: Chicago (R) State: Ill (S) Zip Code: 60609
(T) Phone: (312) 247-2828 (U) County: Cook

(V) Type of Ownership: ____ Federal ____ Municipal ✓ Private ____ State ____ County

(W) Date of Inspection: 11/20/80 Time of Inspection (From) _____ (To) _____

(X) Weather Conditions: _____

(Y) Person(s) Interviewed	Title	Telephone
Mr. Gilbert Gaulin	President	(312)287-2828

(Z) Inspection Participants	Title	Telephone
Isaac K. CHO	Env. Engr.	886-6143
Norm Niedergang	Env. Engr.	886-6753
Charles Gabrien	Env. Specialist (IEPA)	345-9780

II. OTHER TYPE OF HAZARDOUS WASTE ACTIVITY

(A) ____ Generator (Form 2)

(B) ✓ Chemical, Physical and Biological Treatment (Form 4)

(C) ✓ Storage (Form 5)

(D) ____ Landfill (Form 6)

(E) ____ Incineration (Form 7)

(F) ____ Thermal Treatment (Form 7)

(G) Comments: _____

Supplemental forms (Listed in Parathesis) must be completed for each activity inspected. Attach all Supplemental forms to this report.

III. RECORDKEEPING

	Yes	No	Not Inspected	See Remark Number
(A) Are Copies of the Completed Manifest(s) or Shipping Paper(s) Available for Review and Retained for Three Years?				

IV. INTERNATIONAL SHIPMENTS

	Yes	No	Not Inspected	See Remark Number
A. Does the Transporter Record on the Manifest the Date the Waste left the U.S.?				
B. Are Completed Manifest(s) on File?				

V. MISCELLANEOUS

	Yes	No	Not Inspected	See Remark Number
A. Does Transporter Transport Hazardous Waste Into the U.S. from Abroad?				
B. Does the Transporter Mix Hazardous Waste of Different DOT Shipping Descriptions by Placing them into a Single Container?				

NOTE: If (A) or (B) were answered "Yes" then the Transporter is also a Generator and Must comply with the Generator Regulations.

VI. PREPARER INFORMATION

A. Name: Hak K. Cho

Title: Environmental Engineer

Phone No.: (312) 886-6143

Remarks: Transportation activity is not applicable at the time of inspection. It was learned that the Company is planning this activity for future operation.

R.K. 11/6/80

EP IDENTIFICATION NUMBER
ILD005450697

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS
TREATMENT, STORAGE, AND DISPOSAL FACILITIES
Form 4 - Chemical, Physical and Biological Treatment/Land Treatment

I. General Information

(A) Facility Name: Custom Organic Inc

(B) Street: 1445 W. 42nd St

(C) City: Chicago (D) State: Ill (E) Zip Code 60609

(F) Phone: (312) 247-2828 (G) County: Cook

II. Chemical, Physical and Biological Treatment (Subpart Q)

	Yes	No	Not Inspected	See Remark Number
1. Is equipment used to treat only those wastes which will not cause leakage, corrosion, or premature failure?	✓			
2. Is a continuously fed system equipped with a means of hazardous waste inflow stoppage or control (e.g., cut-off system)?	✓			
3. Has the owner or operator addressed the waste analysis requirements of 265.402?	✓			
4. Are inspection procedures followed according to 265.403?	✓			
5. Are the special requirements fulfilled for ignitable or reactive wastes?	✓			
6. Are incompatible wastes treated? (If yes, 265.17(b) applies.)		✓		

N/A

III. Land Treatment (Subpart M)

	Yes	No	Not Inspected	See Remark Number
1. Is hazardous waste capable of biological or chemical degradation?				
2. Are run-off and run-on diverted from the facility or collected (Effective date: November 19, 1981)?				
3. Is waste analysis according to 265.273?				
4. If food chain crops are grown at the facility, has the owner or operator addressed the requirements of 265.276?				
5. Is an unsaturated zone monitoring plan designed and implemented to detect the vertical migration of hazardous waste and provide information on the background concentrations of the hazardous waste available?				
6. Does the unsaturated zone monitoring plan address the minimum information specified in 265.278?				
7. Are records kept regarding application dates and rates, quantities, and location of all hazardous waste placed in the facility?				
8. Are the special requirements fulfilled regarding land treatment of ignitable or reactive wastes?				
9. Are incompatible wastes land treated? (If yes, 265.17(b) applies.)				

Description and disposition | hazardous wastes on location

aste #	EPA HAZARD. WASTE #	Estimated Quantity or Rate (of TSD)	Units of Measure	Process Codes for handling of the waste	Additional Waste Description (if any)
1	F001	3,000,000	P	T01 T04 T04	Simple & Fractional Distillation
2	F002	6,000,000	P	T01 T04 T04	"
3	F003	2,000,000	P	T04 T04	"
4	F005	2,000,000	P	T04 T04	"
5	D001	20,000,000	P	T04 T04	"
6	D003		P		Include w/ above
7					
8					
9					
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ILD005450697
EPA IDENTIFICATION NUMBER

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS
SUPPLEMENTAL FORM 5 FOR STORAGE FACILITY INSPECTIONS

I. General Information

(A) Facility Name: CUSTOM ORGANICS INC.

(B) Street: 1445 W. 42nd St

(C) City: Chicago (D) State: Ill (E) ZIP Code 60609

(F) Date of Inspection: 11/20/80

II. Storage Facility Standards (Part 265)

A. Facilities which store containers of hazardous waste (Subpart I)

	YES	NO	NOT INSPECTED	REMARK #
? 1. Are containers in good condition?	✓			
2. Are containers compatible with waste in them?	✓			
3. Are containers stored closed?	✓			
4. Are containers managed to prevent leaks?	✓			
5. Are containers inspected weekly for leaks and defects?	✓			
6. Are ignitable & reactive wastes stored at least 15 meters (50 feet) from the facility property line?	✓			
7. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply.)	✓			
8. Are containers of incompatible wastes separated or protected from each other physical barriers or sufficient distance?	✓			

B. Facilities which store hazardous waste in tanks (Subpart J)

1. Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank?	✓			
2. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structures?			✓	

Continued on next page

	YES	NO	NOT INSPECTED	REMARK #
3. Do continuous feed systems have a waste-feed cutoff?	✓			manual
Are waste analyses done before the tanks are used to store a substantially different waste than before?	✓			
5. Are required daily and weekly inspections done?	✓			
6. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)	✓			no readings
7. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR 265.17(b) apply.)	✓			
C. Facilities which store hazardous waste in surface impoundments (Subpart K)				N/A
1. Do surface impoundments have at least 60 cm (2 feet) of freeboard?				
2. Do earthen dikes have protective cover?				
3. Are waste analyses done when the impoundment is used to store a substantially different waste than before?				
4. Is the freeboard level inspected at least daily?				
5. Are the dikes inspected weekly for evidence of leaks or deterioration?				
6. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a surface impoundment? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)				
7. Are incompatible wastes stored in different impoundments? (If not, the provisions of 40 CFR 265.17(b) apply.)				
D. Facilities which store hazardous waste in waste piles (Subpart L)				N/A
1. Are waste piles covered or protected from the wind?				
2. Is each in-coming movement of waste analyzed before being added to the waste pile?				
3. Are leachate, run-off, and run-on controlled? (The effective date of this provision is Nov. 19, 1980.)				
Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a pile? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)				

Continued on next page

	YES	NO	NOT IN-SPECTED	REMARK #
5. Are piles of reactive or ignitable waste protected?				
6. Are incompatible wastes stored in different piles? (If not, the provisions of 40 CFR 265.17(b) apply.)				
7. Are piles of incompatible waste protected by barriers or distance from other waste?				