



Illinois Environmental Protection Agency

2520 West Iles Avenue • P.O. Box 19276 • Springfield, Illinois • 62794-9276 • 217-782-3397

JB Pritzker, Governor

James Jennings, Director

217/524-3301

CERTIFIED MAIL

RETURN RECEIPT REQUESTED

OWNER

Safety-Kleen Systems, Inc.
Attn: James Anderson
42 Longwater Dr
Norwell, MA 02061

OPERATOR

Safety-Kleen Systems, Inc.
Attn: James Anderson
42 Tucker Dr
Caseyville, IL 62232

Re: 1630250007 – St. Clair County
Safety-Kleen Systems, Inc.
(Caseyville Service Center)
USEPA ILD981097819
Log No. B-87R2
RCRA Administrative Record – 24D
Permit Draft

Dear Mr. Anderson:

Attached is a draft Resource Conservation and Recovery Act (RCRA) Hazardous Waste Management Part B Permit (draft permit) and fact sheet for the above-referenced facility. The draft permit is based on the administrative record contained in the files of the Illinois Environmental Protection Agency (Illinois EPA). The contents of the administrative record are described in Title 35 Illinois Administrative Code (35 IAC) 705.144.

Under the provisions of 35 IAC 705.141(d), the draft permit, and administrative record must be publicly noticed and made available for public review and comment. The Illinois EPA must also provide an opportunity for a public hearing. Copies of the draft permit, fact sheet, and corrective action permit application are available for review at the Caseyville library, located at 419 S. 2nd Street, Caseyville, Illinois. The Illinois EPA has not scheduled a public hearing at the current time. However, any interested party may request a public hearing. The public comment period will close on September 8th, 2026.

2125 S. First Street, Champaign, IL 61820 • 217-278-5800
1101 Eastport Plaza Dr., Suite 100, Collinsville, IL 62234 • 618-346-5120
595 S. State Street, Elgin, IL 60123 • 847-608-3131
412 SW Washington Street, Suite D, Peoria, IL 61602 • 309-671-3022

115 S. LaSalle Street, Suite 2203, Chicago, IL 60603 • 312-832-0028
9511 Harrison Street, Des Plaines, IL 60016 • 847-294-4000
2309 W. Main Street, Suite 134, Marion, IL 62959 • 618-993-7200
4302 N. Main Street, Rockford, IL 61103 • 815-987-7760



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1630250
007 – Safety-Kleen Systems, Inc. (Caseyville Service Center)
Log No. B-87R2
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During the comment period, the applicant or any interested party may submit comments to the Illinois EPA on the draft permit. At the close of the comment period, the Illinois EPA will prepare a response to significant comments. Comments on the draft permit may be submitted to:

Sarah Brubaker, Office of Community Relations (#5)
Illinois Environmental Protection Agency
2520 West Iles Avenue
Post Office Box 19276
Springfield, Illinois 62794-9276

The Illinois EPA will issue a final Hazardous Waste Management Part B Permit after the close of the public comment period unless the Illinois EPA decides to reverse the tentative decision. The appeal process and limitations are addressed in 35 IAC 705.212.

For questions regarding this letter, please contact Kawthar Babatunde, PhD. by phone at 217/786-0783 or by email at Kawthar.Babatunde@Illinois.gov.

Sincerely,

Joshua L. Rhoades, P.G.
Permit Section Manager
Bureau of Land

JLR: KAB: 1630250007-RCRA-B87R2-Draft.docx

Attachments: Fact Sheet
Draft RCRA Hazardous Waste Management Permit

cc: James Anderson, Safety-Kleen Systems
Jessica Zebre, Clean Harbors
Emily Keener, USEPA, Region V
Norberto Gonzalez, USEPA, Region V

FACT SHEET
for
RCRA HAZARDOUS WASTE MANAGEMENT PERMIT
Safety-Kleen Systems, Inc.
(Caseyville Service Center)
STATE ID NO. 1630250007
FEDERAL ID NO. ILD981097819
PERMIT LOG NO. B-87R2

This fact sheet has been prepared pursuant to the requirements of Title 35 Illinois Administrative Code (35 IAC) 705.143. The fact sheet is intended to be a brief summary of the principal facts and significant factual, legal, methodological, and policy questions considered in preparing a draft Renewed Resource Conservation and Recovery Act (RCRA) Permit (draft Permit). This draft Permit will allow Safety-Kleen Systems, Inc. (Caseyville Service Center), as owner and operator of the facility, to continue to manage hazardous wastes and Potentially Infectious Medical Wastes (PIMW). The three units permitted for hazardous wastes and/or PIMW management are: (1) the Service Center for container storage, (2) the Accumulation Center for container storage and, (3) the Truck Station for van trailer storage. Per RCRA classification, the containers are regulated under 35 IAC 723.112 (Transfer Facility Requirements) , and PIMW is regulated under 35 IAC 1422 Subpart B (Storage or Transfer Operations for PIMW).

This draft Permit is being issued based on the RCRA renewal permit application submitted by the Permittee, which requested to maintain its RCRA permit for the facility in order to continue to operate 10-day hazardous waste storage and 30-day PIMW storage activities under a RCRA renewed Permit.

Pursuant to 35 IAC 705.143(a), this fact sheet is sent to the applicant and to any other person who requests it.

A. INTRODUCTION

1. The draft Permit for Safety-Kleen Systems, Inc. contains all of the standard conditions required by 35 IAC Parts 702, 703, 724, 722 and 1422 for the continued management of hazardous waste and PIMW at the Caseyville Service Center; the applicable conditions of all PIMW shall be subject to Section 56.5 of the Act Environmental Protection Act (Act), 35 IAC 724 Subpart I, as applicable, and 35 IAC 1422 Subpart B. The Caseyville Service Center is an existing facility that has been operating under the RCRA Permit, originally issued June 28, 1994 (B-87), and renewed October 8, 2008 (B-87R). Prior to that, the facility was operating under interim status since the effective date of RCRA (October 30, 1991).

B. DESCRIPTION OF FACILITY

1. Site Description and Location

The Caseyville Service Center is located at 20 Tucker Drive, Caseyville, Illinois, approximately one-half mile southwest of the intersection between Interstate 64 and State Route 157. The facility covers 2.7 acres.

2. General

The Caseyville Service Center, owned and operated by Safety-Kleen Systems, Inc. manages hazardous and non-hazardous wastes for storage and/or transfer to approved off-site waste management facilities. The facility serves as a general accumulation center for various hazardous and non-hazardous wastes, where wastes are stored for up to 10 days before off-site shipment to other permitted facilities for disposal or recycling. The facility also receives hazardous and non-hazardous PIMW for up to 30 days storage. PIMW accepted include cultures and stocks, human blood and blood products, used and unused sharps, animal waste, isolation waste, and other medical wastes. These hazardous wastes are accepted on a transfer basis in accordance with 35 IAC 723.112. A maximum of 55,659 gallons of wastes may be stored in the container storage areas.

C. HAZARDOUS WASTE MANAGEMENT ACTIVITIES

1. Description of Existing Units

- a. Service Center Container Storage Area: This unit with a capacity of 2,400 gallons is used for the storage of hazardous and non-hazardous PIMW in containers. This unit is included in an approximately 5,600-square foot building referred to as the Service Center.
- b. Accumulation Center Container Storage Area: This unit with a combined capacity of 42,259 gallons includes two container storage areas and is used for the storage of both hazardous and non-hazardous wastes. This unit is included in an approximately 8,000-square foot building referred to as the Accumulation Center.
- c. Truck Station for Van Trailer Storage: This area with a capacity of 11,000 gallons is used for storage of two van trailers of hazardous and/or PIMW. Each of these storage areas may also store non-hazardous containerized wastes.

2. Description of Historical Units

- a. One 15,000-gallon waste mineral spirits aboveground storage tank (AST) including ancillary piping and containment. The tank was historically used for the storage of spent parts washer solvent and was certified closed on November 8, 2012 (Log No. B-87R-CERT-1).
- b. Return and Fill Area: This area contains one tank and 162-gallon drum washer. It was historically used to transfer spent parts washer solvent from containers to the spent solvent storage tanks listed in (a) above. This area and was certified closed on November 8, 2012 (Log No. B-87R-CERT-1).
- c. Container Storage Area (CSA) in Service Center: This storage area was previously used to store dumpster sediment and spent immersion cleaner waste with a capacity of 2,400 gallons. This area was certified closed on November 8, 2012 (Log No. B-87R-CERT-1).

D. PERMIT CONDITIONS

The following is a brief description of the requirements of the draft Permit:

1. Section II of the draft Permit contains conditions regarding the management of containers in the permitted PIMW storage units.
2. Section III of the draft permit contains the conditions that must be followed for required corrective actions for SWMUs and should there be a need to institute corrective actions as a result of a release from the facility.
3. Section IV of the draft Permit contains standard conditions that are regulatory requirements of 35 IAC Parts 702, 703, and 724. The standard conditions are of a general nature and are applicable to all hazardous waste management facilities regulated pursuant to an Illinois EPA RCRA Permit. These conditions include the effectiveness of the Permit, Permit actions, Permit severability, Permit expiration, monitoring, retention of records, Permit transfer, and compliance schedules.
4. Section V of the draft Permit contains special conditions that are unique to the facility. The Permit conditions implement the regulatory requirements of 35 IAC Parts 724 and the Illinois Environmental Protection Act (Act).
5. Section VI of the draft Permit contains a summary of the reporting and notification requirements the Permittee must follow.

E. CONSIDERED PERMIT ACTIONS OTHER THAN RCRA

1. Air

The air emissions from a hazardous waste management facility are regulated under RCRA, the Clean Air Act (CAA), the Illinois' Environmental Protection Act, and State regulations at Title 35 IAC , Subtitle B: Air Pollution. Under these statutes and regulations, a Permit must be obtained to install or operate any process which is, or may be, a source of air pollutants. The Caseyville facility is not currently required to have any air Permits under the federal regulation of the CAA. The Caseyville Service Center maintains an Air Emissions Operating Permit for Small Sources from the Division of Air Pollution Control of the Illinois EPA Bureau of Air. Safety-Kleen received Air Emissions Operating Permit #163025AAG on May 16, 1997, and continues to operate under the Permit's guidelines.

2. Water

A discharge of any waste waters from a hazardous waste management facility into the waters of the State, is required to have a National Pollutant Discharge Elimination System (NPDES) Permit, issued by the Illinois EPA Bureau of Water under Section 39(b) of the Environmental Protection Act. The facility has no RCRA regulated units subject to these water discharge requirements. The Caseyville Service Center currently operates under a No Exposure Certification.

F. PROCEDURES FOR REACHING A FINAL DECISION

Pursuant to 35 IAC 705.162(a)(2), the public is given at least 45 days to review the application and draft permit and provide comments on the draft permit conditions prior to Illinois EPA taking any final permitting action on the application for this draft permit. The comment period will begin on July 23rd, 2026, the date of the first publication of the public notice in the newspaper of general circulation in the area. The comment period will end on September 8th, 2026.

Copies of the permit application, draft permit, and fact sheet are available for review at:

Caseyville Library
419 S. 2nd Street
Caseyville, IL 62232
618-345-5828

The administrative record contains the permit application, draft permit, fact sheet, and other supporting documents and correspondence submitted to the Illinois EPA. The administrative record can be made available for public inspection by appointment only at the Illinois EPA's Springfield headquarters from 9:00 a.m. to 5:00 p.m., Monday through

Friday. Inspections of the administrative record must be scheduled in advance by contacting Ms. Sarah Brubaker of the Illinois EPA at the address listed below.

In response to requests received during the comment period or at the discretion of the Illinois EPA, a public hearing may be held to clarify one or more issues concerning the permit application. A request for a public hearing must be submitted in writing, must indicate opposition to the draft permit and must state the nature of the issues proposed to be raised at the hearing. Public notice of the public hearing will be issued at least 45 days before the hearing date.

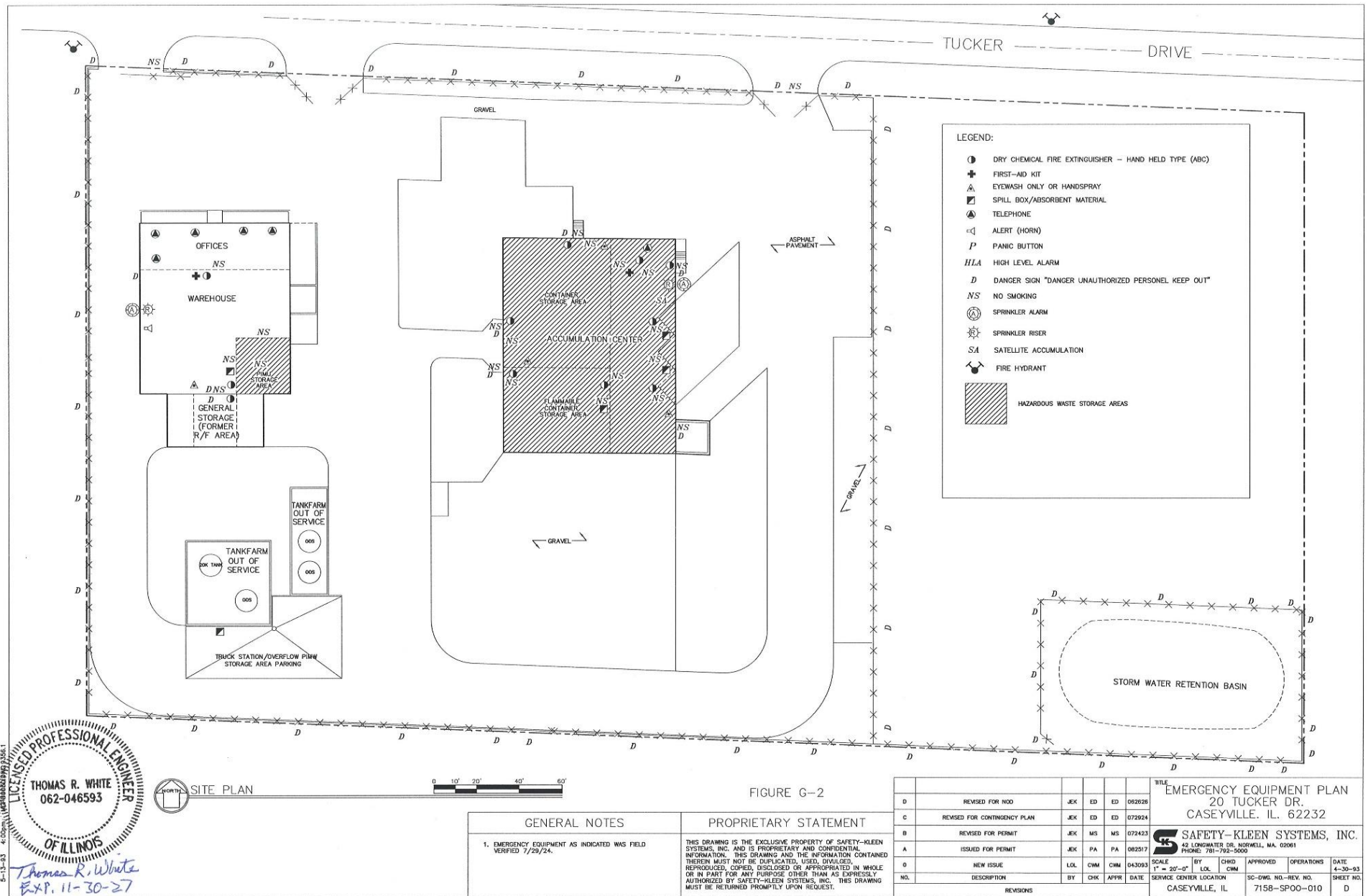
For further information regarding the permit process, to submit written comments on the draft permit, or to request a public hearing, please contact:

Sarah Brubaker, Office of Community Relations #5
Illinois Environmental Protection Agency
2520 West Iles Avenue
Post Office Box 19276
Springfield, Illinois 62794-9276
(217) 786-0790

When the Illinois EPA makes a final permit decision, notice will be given to the applicant and each person who has submitted written comments or requested notice of the final permit decision. The Permit will become effective 35 days after service of notice of the decision or at a later date if stated in the Permit unless the decision is appealed.

Attachment - Site Location Map

1630250007 – Safety-Kleen Systems, Inc. (Caseyville Service Center)
Fact Sheet – Attachment





Illinois Environmental Protection Agency

2520 West Iles Avenue • P.O. Box 19276 • Springfield, Illinois • 62794-9276 • 217-782-3397

JB Pritzker, Governor

James Jennings, Director

RCRA HAZARDOUS WASTE PERMIT

IEPA #1630250007 -- St. Clair County
USEPA ILD981097819
Safety-Kleen Systems, Inc.
Permit Log No. B-87R2
RCRA Administrative Record – 24D
Permit Draft

Issue Date: DRAFT
Effective Date: DRAFT
Expiration Date: DRAFT

OWNER

Safety-Kleen Systems, Inc.
Attention: James Anderson
42 Longwater Drive
P. O. Box 9149
Norwell, MA 02061

OPERATOR

Safety-Kleen Systems, Inc.
(Caseyville Service Center)
Attention: James Anderson
20 Tucker Drive
Caseyville, Illinois 62232

A renewed RCRA Part B Permit is hereby issued to Safety-Kleen Systems, Inc. (Caseyville Service Center) pursuant to the Resource Conservation and Recovery Act, Illinois Environmental Protection Act, and Title 35 Illinois Administrative Code (35 IAC) Subtitle G and Subtitle M to maintain and operate a waste management facility involved in the storage of hazardous waste and Potentially Infectious Medical Wastes (PIMW).

PERMITTED HAZARDOUS WASTE ACTIVITY

This RCRA Permit requires Safety-Kleen Systems, Inc. (Caseyville Service Center) to conduct the following hazardous waste activities in accordance with the approved permit application and the conditions in this Permit:

- 1. Storage: 10-day Hazardous Wastes Storage and 30-day PIMW Storage**
- 2. Corrective Action: Corrective action cleanup for SWMUs and any future release contamination.**

This RCRA Permit consists of the conditions contained herein and those in sections and attachments in this RCRA Permit. The Permittee must comply with all terms and conditions of this Permit and the applicable regulations contained in 35 IAC Parts 702, 703, 705, 720 through 729, and 1420 through 1422 in effect on the effective date of this Permit. The Environmental Protection Act (Ill. Rev. Stat., Chapter 111 1/2, Par. 1039) grants the Illinois Environmental Protection Agency the authority to impose conditions on Permits which are issued.

This Permit is issued based upon the information submitted in the approved permit application identified in Attachment D of this Permit and any subsequent amendments. Any inaccuracies found in the information provided in the permit application may be grounds for the termination or modification of this Permit (see 35 IAC 702.186 and 702.187) and potential enforcement action (415 ILCS 5/44(h)).

DRAFT

Joshua L. Rhoades, P.G.
Permit Section Manager
Bureau of Land

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RCRA Hazardous Waste Management Permit

Safety-Kleen Systems Inc.

(Caseyville Service Center)

Permit Log No. B-87R2

State ID No. 1630250007

Federal ID No. ILD981097819

RCRA HAZARDOUS WASTE PERMIT**B-87R2****TABLE OF CONTENTS**

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SECTION I: GENERAL FACILITY DESCRIPTION

A. OWNER AND OPERATOR

The facility, Caseyville Service Center is owned and operated by Safety-Kleen Systems, Inc. herein referred to as the "Permittee(s)." (Title 35 Illinois Administrative Code (35 IAC) 702.121, 702.123, and 703.181)

Safety-Kleen Systems, Inc.
(Caseyville Service Center)
20 Tucker Drive
Caseyville, Illinois 62232

B. LOCATION

1. Location of Facility

The Caseyville Service Center is located at 20 Tucker Drive, Caseyville, Illinois, approximately one-half mile southwest of the intersection between Interstate 64 and State Route 157. The facility covers 2.7 acres and is located at address in Condition I.A above. The facility contact is:

James Anderson, Compliance Manager
Safety-Kleen Systems, Inc.
(Caseyville Service Center)
20 Tucker Drive
Caseyville, Illinois 62232
316-708-0971

2. Facility Map

The general location of the facility, a site layout map, the location of all hazardous wastes and Potentially Infectious Medical Wastes (PIMW) storage areas are provided in Attachment E of this Permit.

C. DESCRIPTION OF HAZARDOUS MANAGEMENT ACTIVITIES

The Caseyville Service Center, owned and operated by Safety-Kleen Systems, Inc. manages hazardous and non-hazardous wastes for storage and/or transfer to approved off-site waste management facilities. The facility serves as a general accumulation center for various hazardous and non-hazardous wastes where wastes are stored for up to 10 days before off-site shipment to other permitted facilities for disposal or recycling.

The facility also receives hazardous and non-hazardous PIMW for up to 30 days storage in accordance with 35 IAC 1420.102. PIMW wastes accepted includes cultures and stocks, human pathological, human blood and blood products, used and unused sharps, animal waste, isolation waste, and other medical wastes. These hazardous wastes are accepted on a transfer basis in accordance with 35 IAC 723.112.

A maximum of 55,659 gallons of wastes may be stored in the container storage areas.

The facility has the following existing and historical hazardous waste management units. The units include:

1. Operating Units Under this Permit

- a. Service Center Container Storage Area: This unit with a capacity of 2,400 gallons is used for the storage of hazardous and non-hazardous PIMW in containers. The Container Storage Area is included in an approximately 5,600-square foot building referred to as the Service Center.
- b. Accumulation Center Container Storage Area: This unit with a combined capacity of 42,259 gallons has two container storage areas and is used for the storage of both hazardous and non-hazardous wastes. The Container Storage Area is included in an approximately 8,000-square foot building referred to as the Accumulation Center.
- c. Truck Station: This area with a capacity of 11,000 gallons is used for storage of two van trailers of hazardous and/or PIMW. Each of these storage areas may also store non-hazardous containerized wastes.

2. Historical RCRA Permitted Units

- a. One 15,000-gallon waste mineral spirits above ground tank (AST) including ancillary piping and containment. The tank was historically used for the storage of spent parts washer solvent; the closure certification of the unit was accepted by the Illinois EPA on November 8, 2012 (Log No. B-87R-CERT-1).
- b. Return and Fill Area: This area contains one tank, a 162-gallon drum washer, and ancillary piping. It was historically used to transfer spent parts washer solvent from containers to the spent solvent storage tanks listed in (a) above. The closure certification of the unit was accepted by the Illinois EPA on November 8, 2012 (Log No. B-87R-CERT-1).
- c. Service Center Container Storage Area (CSA) was previously permitted for more than 90-day storage of hazardous dumpster sediment and spent immersion

cleaner wastes with a capacity of 2,400 gallons under the facility's RCRA Permit; the closure certification of this CSA unit was accepted by the Illinois EPA on November 8, 2012 (Log No. B-87R-CERT-1).

SECTION II: CONTAINER STORAGE**A. SUMMARY**

This Section presents permit conditions for the storage of hazardous and non-hazardous waste in various sizes of containers. This facility receives hazardous waste for up to 10-day storage before off-site shipment to other permitted facilities for disposal or recycling. The facility also receives hazardous and non-hazardous Potential Infections Medical Wastes (PIMW) for up to 30-day storage in accordance with 35 IAC Subtitle M. PIMW wastes accepted includes cultures and stocks, human pathological, human blood and blood products, used and unused sharps, animal waste, isolation waste, and other medical wastes in accordance with . These hazardous wastes are accepted on a transfer basis in accordance with 35 IAC 723.112.

B. DESCRIPTION OF CONTAINER STORAGE AREAS AND WASTES

1. The Permittee may store a total volume of 55,659-gallons of waste in the container storage area(s) identified in this condition. The Permittee shall construct, operate, and maintain the container storage areas identified in this condition in accordance with the approved permit application and the conditions in this permit.

<u>Storage Area</u>	<u>Maximum Capacity</u>	<u>Dimensions in feet (')-inches (")</u>	<u>Waste Material Stored</u>
Service Center Container Storage Area	2,400 gallons	23'-6" x 24'-11"	PIMW
Truck Station	11,000 gallons	74'-10" x 39'-11"	Hazardous and non-hazardous wastes, and PIMW
Accumulation Center Container Storage Area	42,259 gallons	43'-2" x 100'-8"	Hazardous and non-hazardous wastes

2. The Permittee may only store non-hazardous and hazardous wastes on a 10-day transfer basis in the Service Center Container Storage Area, the Accumulation Center Container Storage Area, or the Truck Station. All transfer wastes must be evaluated for compatibility prior to being placed into these storage areas. The Permittee also may store hazardous wastes on a 10-day transfer basis in non-RCRA permitted areas in accordance with 35 IAC 723.112.

3. The Permittee may store PIMW for up to 30 days only in the Service Center Container Storage Area and the Truck Station.
4. The Permittee may store non-hazardous transfer waste in containers in the service Center Container Storage Area, the accumulation Center Container Storage Area, or the Truck Station for up to 10 days without terminating the manifest for such non-hazardous transfer waste at the facility.

C. SPECIAL REQUIREMENTS FOR STORAGE OF PIMW

PIMW storage in this facility is subject to the following conditions. In case of conflict between the application and plans submitted and these conditions below, the conditions of this Permit shall govern.

1. This facility is permitted to accept PIMW as defined in 35 IAC 1420.102. The facility may only accept the following chemotherapy wastes: gloves, gowns, absorbent pads, empty vials, empty syringes, and empty tubing.
2. The permittee may receive and transfer PIMW at the site during its hours of operations as specified in Section B.1 of the approved permit application.
3. All PIMW shall be subject to fees in accordance with 56.6 of the Act.
4. The permittee shall notify the Illinois EPA of any changes from the information submitted to the Illinois EPA in its application for a developmental and operating permit for this site. The permittee shall notify the Illinois EPA of any changes in the names or addresses of both beneficial and legal titleholders to the herein-permitted site. Such notification shall be made in writing within 15 days of such change and shall include the name or names of any parties in interest and the address of their place of abode; or, if a corporation, the name and address of its registered agent.
5. Any modification to the facility shall be the subject of an application for supplemental permit for site modification submitted to the Illinois EPA.
6. This permit is subject to review and modification by the Illinois EPA as deemed necessary to fulfill the intent and purpose of the Act, and all applicable environmental rules and regulations.
7. This permit is issued with the expressed understanding that no process discharge to Waters of the State or to a sanitary sewer will occur from these facilities, except as authorized by a permit from the Illinois EPA Bureau of Water (BOW).
8. Site surface drainage during development, operation, and after the site is closed,

shall be such that no adverse effects are encountered by adjacent property owners.

9. The best available technology (mufflers, berms, and other sound shielding devices) shall be employed to minimize equipment noise impacts on property adjacent to the site during both development and operation.
10. Fire safety equipment (fire extinguishers) shall be maintained in accordance with National Fire Protection Association (NFPA) recommended practice.
11. A vector control specialist shall inspect the PIMW transfer station facility at least quarterly. If necessary, vector control measures shall be taken. The results of these inspections shall be maintained as part of the facility operating record and shall be made available to the Illinois EPA upon written or verbal request.
12. Special wastes received at the site shall be transported to the facility utilizing the Illinois EPA's supplemental permit system and manifest system. An Authorization Number is not required when manifesting PIMW to this facility for treatment.
13. Special wastes generated at the site for disposal, storage, incineration or further treatment elsewhere shall be transported to the receiving facility utilizing the Illinois EPA's supplemental permit system and manifest system.
14. The Permittee shall screen PIMW containers upon arrival at the facility for radioactive materials.
15. The Permittee shall weigh in pounds the amount of PIMW received, unless (1) the PIMW was previously weighed by the transporter, or (2) the PIMW will subsequently be weighed at a facility designed to treat PIMW to eliminate its infectious potential.
16. The Permittee shall weigh the PIMW with a device for which a certificate of conformance has been obtained pursuant to National Institute of Standards and Technology Handbook 44. The PIMW may be weighed on a device outside the State of Illinois, provided that the device complies with the weights and measures regulations of that other state.
17. PIMW shall be stored in designated areas so as not to contaminate other waste or materials. All cardboard packages shall be stored in an enclosed area at an elevation above that of the floor.
18. PIMW shall be stored and transferred on a surface that allows for decontamination, drainage and collection of liquids and that minimizes exposure of PIMW to workers and the public.
19. PIMW packages shall be stored and transferred in a manner and location which

maintains the integrity of the packaging and provides protection from water, rain, and wind.

20. The Permittee shall use the following container management practices at this PIMW facility:
 - a. Containers must be stored in a manner which prevents compaction or rupture of containers;
 - b. Containers shall not be stacked more than 10 feet high;
 - c. Containers may not be opened at this facility. Any situation which results in opening or rupture of a container or where a container is leaking shall require implementation of the contingency plan in the approved permit application.
21. The aisle space maintained between rows of pallets shall be at least 48 inches or greater, as necessary. Containers shall be arranged in a manner which allows for the inspection of individual containers.
22. A vehicle containing PIMW is exempt from the aisle space requirement when loading or unloading a vehicle, or when the vehicle is fully loaded. These aisle space exemptions must not exceed five calendar days.
23. The Permittee shall maintain the PIMW in a non-putrescent state while stored at this facility, using refrigeration when necessary.
24. The Permittee shall limit access to the storage and treatment areas to authorized personnel only.
25. The Permittee shall maintain the following information in the facility operating record:
 - a. Quantities of PIMW stored, or transferred;
 - b. Date and time the PIMW was placed into storage or treated;
 - c. Date and time the PIMW left the storage operation;
 - d. Waste stream permit number, if applicable;
 - e. Temperature the PIMW was maintained at during the storage operation;
 - f. Destination of any PIMW shipped off-site;
 - g. In a separate log, date, time, nature, and extent of all discharges and personal

injuries and the results of any response taken;

h. Records of annual personnel training; and

i. Records of inspections.

26. PIMW shall remain at this site no longer than:

a. 72 hours without refrigeration;

b. Five days without at least aisle space of 48 inches or greater between packages so that at least one side of each package and its readable labels may be inspected; and

c. A maximum of 30 days with refrigeration and with aisle space of 48 inches or greater.

27. The Permittee shall prominently display signs at the entrance to the PIMW transfer and storage area. The signs must be marked in lettering that is readable at a distance of five feet. At a minimum, the sign must display the international biohazard symbol and the word "biohazard."

28. The Permittee shall conduct annual training to explain the daily operating procedures for the storage and transfer of PIMW and contingency plan. This training shall be given to all personnel that manage PIMW.

29. The Permittee shall keep and make available for Illinois EPA inspection:

a. Records describing the amount of PIMW accepted for storage and transfer;

b. Records required by 35 IAC 1422.111(b)(10) of the Act; and

c. A Daily PIMW Report within 24 hours of a request by the Illinois EPA.

30. The Permittee shall maintain the surface of the PIMW management area so that it remains impervious.

31. The outdoor storage areas containing PIMW shall be secured against unauthorized access.

32. The Permittee shall comply with the following manifesting requirements:

a. In order to implement the requirements of 35 IAC 1420.104(d), the Permittee shall not accept any PIMW for storage/transfer at this facility which is not accompanied by a properly completed manifest. A properly completed manifest

is one which:

- i. Complies with the Illinois EPA's current instructions for completing manifests;
 - ii. Identifies the original waste generator or a permitted facility as the waste generator; and
 - iii. Identifies the Permittee on the manifest as the designated facility.
- b. In order to implement the requirements of 35 IAC 1420.104(d), the Permittee shall not transport from this facility, any waste stored/transferred at this facility unless the waste is accompanied by a properly completed manifest which indicates the generator of the waste.
 - c. In accordance with 35 IAC 1422.111(a)(10), the Permittee shall retain copies of all manifests for all wastes stored/transferred at this facility or transported from this facility, for a period of at least three years.
33. All rejected containers of PIMW shall be removed from the site within 24 hours of receipt in accordance with manifest requirements.
34. All ash containers shall be managed so that no fugitive dust occurs, and so that the ash is not exposed to the elements.
35. All containers used to transport ash on public highways shall be covered during transport. These containers shall be designed such that liquids cannot drain out of them.
36. The Permittee shall review the approved Closure Plan to ensure it complies with the standard identified in 35 IAC 1420.107 at least 180 days prior to initiating closure of the facility. If a Closure Plan modification is required, the Permittee shall not file any application to modify the Closure Plan less than 150 days prior to receipt of the final volume of waste.
37. Upon completion of closure activities, the Permittee will notify the Illinois EPA that the site has been closed in accordance with the approved Closure Plan utilizing the Illinois EPA's "Affidavit for Certification of Completion of Closure of Non-Hazardous Waste Facilities" found on the Illinois EPA website.

D. GENERAL REQUIREMENTS FOR CONDITION OF CONTAINERS

1. If a container holding waste is not in good condition (e.g., severe rusting, apparent structural defect, etc.) or if it begins to leak (this includes waste which appears on

the outside of the drum/box but has not spread to the containment base or other containers), the Permittee must immediately transfer the waste from this container to a container that is in good condition, overpack the container, or manage the waste in accordance with the approved permit application.

2. Any transfer of waste which was required to comply with Condition II.D.1 must be recorded in a separate incident log and maintained as part of the facility's operating record.
3. Packaging of all wastes accepted for storage in the container storage area(s) shall meet the requirements of 49 CFR 172, 178 and 179 and all applicable DOT and NFPA regulations. All containers must be marked and placarded in accordance with 49 CFR 172.
4. The contents of each container shall be clearly identified on the side of the container in accordance with 49 CFR 172 prior to being placed in the container storage area(s).

E. COMPATIBILITY OF WASTE WITH CONTAINERS

The Permittee must use a container made of or lined with material which will not react with and is otherwise compatible with the waste to be stored so that the ability of the container to contain the waste is not impaired.

F. MANAGEMENT OF CONTAINERS

The Permittee shall comply with the following management practices:

1. A container holding waste must always be closed during storage, except when it is necessary to add or remove waste.
2. The containers shall be clearly marked with the date received prior to being placed into storage.
3. The following management practices apply to arrangements of containers that contain one or more containers of D001 (ignitable) waste:
 - a. The maximum stacking height shall not exceed:
 - i. 5 feet, for stacks which contain liquids with a flash point less than 100°F.

- ii. If all the containers in a stack have a flash point greater than 100°F, the maximum height shall be 6.5 feet., unless the waste is stored in accordance with Condition II.F.5.
- b. Each arrangement of containers (i.e. containers grouped in a given area) shall be separated from other arrangements of containers by a 4-foot aisle. The maximum volume of containers in each arrangement shall not exceed the following:
 - i. 1,375 gallons, for arrangements with one or more containers of waste which has a flash point less than 100°F,
 - ii. 4,125 gallons, if all containers within the arrangement contain waste with a flash point greater than 100°F.
- c. Each arrangement of containers shall be separated from other arrangements of containers by a 4-foot aisle.
 - i. Each container shall be no further than 12 feet from a 4-foot aisle.
 - ii. An aisle that is a minimum of 2 feet wide must be maintained within the arrangement between each row of pallets and between pallets and a wall. This is for the purpose of providing access for inspection of each container and is required in addition to the aisles separating each stack or arrangement.
 - iii. No container shall be closer than 3 feet to the nearest beam, chord, girder, or other roof member.
- 4. The following management practices apply to arrangements of containers that do not include any containers holding D001 waste.
 - a. Within each arrangement of containers an aisle must be maintained between each row of pallets and between the pallets and a wall. The aisle must be a minimum of 2 feet wide. This is for the purpose of providing access for inspection of each container.
 - b. For purposes of inspection, the height shall not exceed 6.5 feet or two containers, whichever has the greatest height, unless the waste is stored in accordance with Condition II.F.3(a)(iii).
- 5. For containers that are stored a maximum of 10 feet high provided the following inspection and recordkeeping procedures must be used:

- a. The date on each container stacked in an arrangement must be clearly visible from a distance of 6.5 feet and positioned so it could be read from the inspection aisle. In the event a group of containers arrive on site shrink wrapped or banded together and are not separated prior to storage, the date may be marked on the group in lieu of each individual container, provided the date is clearly visible from the ground level inspection aisle.
 - b. Each container stacked in an arrangement which is greater than 6.5 feet high shall be inspected daily for the following concerns:
 - i. Condition of the containers.
 - ii. Structural integrity of the containers.
 - iii. Signs of leakage.
 - iv. Missing bungs/tops.
 - v. Signs of corrosion.
 - vi. Stability of the pile.
 - vii. Visibility and readability of the label and date received.
 - c. The inspection is conducted from a free-standing ladder, scaffold or other free standing device which allows the inspector to view the top of the containers (i.e., greater than 10 feet).
 - d. No container shall be stacked within this arrangement in a manner which compromises the integrity of the package.
6. The main aisle shall be a minimum of 8 feet (96 inches) wide, and access shall be maintained to all doors required for egress, including emergency exit.
7. Containers may be stacked provided that:
- a. Only the same size or smaller containers are stacked on top of the containers beneath;
 - b. DOT approved containers may be stacked up to 3 feet high without the use of a pallet. Containers may be stacked more than 3 feet high without the use of a

pallet only if the containers have been tested at the proposed stacking height in accordance with DOT stack testing procedures described in 49 CFR 178.606; and

- c. The stacking height does not exceed 6.5 feet.
- 8. A container holding hazardous waste must not be opened, handled, or stored in a manner that may rupture the container or cause it to leak.
- 9. Containers shall be positioned such that the markings and labels are readable during inspections.

G. INSPECTIONS

The Permittee shall inspect the container storage area(s) in accordance with the approved permit application and the inspection schedule specified in Attachment B to this Permit. The inspection must be adequate to detect leaks and deterioration of containers and the containment systems caused by corrosion or other factors. The procedures described in the approved permit application must be used with the following modifications:

- 1. Action shall be taken to immediately overpack a leaking or deteriorating drum, or to transfer the waste from this container to a container that is in good condition. Appropriate action to clean up any release of waste from a leaking or deteriorated drum shall be carried out immediately after the drum has been overpacked, or the waste has been transferred.
- 2. If a portion of the containment system is found to be in a deteriorated condition (e.g. cracks, gaps, spalling, failure of the coating, etc.) the Permittee shall immediately remove all waste containers from the deteriorated area until the containment system has been repaired.
- 3. The weekly inspection shall include checking aisle spacing, height of stacks and remaining capacity.
- 4. Results of all inspections and the activities undertaken to correct deficiencies shall be documented in the operating record for the facility.
- 5. Each container stacked in an arrangement which is greater than 6.5 feet high shall be inspected daily for stability of the pile.
- 6. If spills and releases are observed in the container loading/unloading area, such releases shall be immediately remediated in accordance with all applicable

regulations (e.g., 35 IAC 724, Subpart D), and the Special Conditions found in Section V of this Permit. Results of this inspection and a description of the corrective action taken, if necessary, shall be documented in the inspection log.

H. CONTAINMENT

The Permittee shall construct, operate and maintain the containment system according to the design plans and operating specifications contained in the approved permit application, and shall also perform a complete inspection of the surface coating yearly and perform annual maintenance, if necessary, to insure the integrity of the coating.

I. SPECIAL REQUIREMENTS FOR IGNITABLE OR REACTIVE WASTE

1. The Permittee may accept hazardous reactive waste in containers on a 10-day transfer basis at the facility.
2. The Permittee shall not locate containers which hold ignitable waste within 50 feet of the facility's property line.
3. The Permittee shall take precautions to prevent accidental ignition or reaction of ignitable waste.
4. Ignitable wastes must be separated and protected from sources of ignition or reaction including but not limited to:
 - a. Open flames, smoking, cutting and welding, hot surfaces, frictional heat, sparks (e.g., static, electrical, or mechanical), spontaneous ignition (e.g., from heat producing chemical reactions), and radiant heat.
 - b. While ignitable waste is being handled, the Permittee must confine smoking and open flame to specially designated locations.
 - c. "No Smoking" signs must be conspicuously placed wherever there is a hazard from ignitable waste.

J. SPECIAL REQUIREMENTS FOR INCOMPATIBLE WASTE

The Permittee shall not store containers holding a material that is incompatible with any waste or other materials stored nearby, unless separated from other waste/materials or protected from them by means of a dike, berm or other devices.

K. GENERAL OPERATING REQUIREMENTS

The Permittee shall operate the container storage area(s) in accordance with the approved permit application, subject to the following modifications:

1. The Permittee may receive hazardous waste for storage in containers provided the following requirements are met:
 - a. The material must be a waste which has been identified in Attachment A to this Permit.
 - b. The waste must be accompanied by a properly completed Federal manifest form unless the generator is (a) a conditionally exempt small quantity generator as defined in 35 IAC 721.105(a), (b) subject to the tolling exemption as defined in 35 IAC 722.120(e), or (c) otherwise exempted from manifesting requirements under Title 35 of the Illinois Administrative Code.
2. Cleanup of all spills inside the secondary containment areas must begin immediately upon discovery and be completed within 24 hours. Secondary containment must be inspected immediately after cleanup for cracks, gaps or other defects (failure of the coating) which would allow waste to migrate to the underlying soil. If any deterioration is discovered, the Permittee shall immediately remove all waste from the deteriorated area.
3. The storage and transfer of PIMW wastes may only occur in the Service Center Container Storage Area and the Truck Station.

L. CLOSURE REQUIREMENTS

At closure, all waste and waste residues must be removed from the containment system(s). Remaining containers, liners, bases and soil containing or contaminated with waste or waste residue must be decontaminated or removed. Closure of the container storage area(s) shall be carried out in accordance with the closure plan in the approved permit application, as modified below:

1. Conditions II.36 to II.37 apply for PIMW storage units.
2. Prior to closing the hazardous storage units identified in Condition II.B, the Permittee must meet the conditions specified by 35 IAC 724.117(a)(8).
3. The Permittee shall notify the Illinois EPA Bureau of Land Permit Section in writing of its intent to close the container storage area at least 45 days prior to the date closure is expected to begin. Along with this notification, the Permittee shall submit

a sampling and analysis plan to be used in demonstrating the container storage area has been properly decontaminated. This plan must be approved by the Illinois EPA Bureau of Land Permit Section in writing prior to being implemented. Illinois EPA review of this plan will be subject to the permit appeal provisions contained in Sections 39(a) and 40(a) of the Act. The response from the Illinois EPA will approve and establish:

- a. The sampling plan;
 - b. What contaminants must be analyzed for; and
 - c. The level at which decontamination is considered complete.
 - d. Analytical requirements (SW 846 Methods should be utilized); and
 - e. The level at which decontamination or removal is considered complete.
4. Within 60 days after closure of the container storage area is complete, the Permittee(s) shall submit a certification to the Illinois EPA that the unit has been closed in accordance with the approved closure plan.

The Certification of Completion of Closure form in Attachment C to this Permit must be used. Signatures must meet the requirements of 35 Ill. Adm. Code Section 702.126. The qualified Professional Engineer (registered in the State of Illinois) should be present at all critical, major points (activities) during the closure. These might include decontamination, integrity assessment of the unit and any sampling. The frequency of inspections by the qualified Professional Engineer must be sufficient to determine the adequacy of each critical activity. Financial assurance must be maintained for the area(s) until the Illinois EPA approves the closure certification for the unit. The Illinois EPA's review of closure certification for partial or final closure will be conducted in accordance with 35 IAC 724.243.

A Closure Documentation Report is to be submitted with the Certification of Completion of Closure, which includes the following items, if applicable:

- a. The volume of waste and waste residue removed, including wastes resulting from decontamination activities.
- b. A description of the method of waste handling and transport.
- c. Copies of the waste manifests.
- d. A description of the sampling and analytical methods used including sample preservation methods and chain-of-custody information.

- e. A chronological summary of closure activities and the cost involved.
 - f. Tests performed, with methods and results.
 - g. Color photographs of closure activities which document conditions before, during and after closure.
 - h. A scale drawing of all excavated or decontaminated areas and sample locations.
5. All rinsate, washwater, and sweepings collected during closure of the container storage area(s) shall be managed as hazardous wastes, unless analyses indicate that these wastes are non-hazardous (i.e., no longer exhibits a characteristic or contains the constituent for which the waste was listed).
6. To avoid creating another regulated storage unit during closure, it is recommended that you obtain any necessary permits for waste disposal prior to initiating excavation activities. If it is necessary to store excavated hazardous waste on site prior to off site disposal, do so only in containers or tanks for less than 90 days. Do not create regulated waste pile units by storing the excavated hazardous waste in piles. The 90 day accumulation time exemption (35 IAC 722.134) only applies to containers, tanks, containment buildings and drip pads.
7. The Permittee shall provide post-closure care in accordance with 35 IAC, Part 724, for the container storage area(s) if all of the hazardous wastes or contaminated soils cannot be practicably removed or decontaminated in accordance with the closure requirements outlined in the Permit and in the approved closure plan. If it is determined that the closure requirements cannot be met and post-closure care for the container storage area(s) is required, this Permit will be modified to require post-closure care of the container storage area(s) in accordance with 35 IAC 724, Subparts G and H.
8. Should post-closure care, as described in Condition II.L.7, become necessary, the Permittee shall submit an application for modification to this Permit, including an amended closure and post-closure care plan for this unit, within 30 days following discovery that clean closure cannot be accomplished. If a determination is made to not pursue clean closure prior to the implementation of the closure plan for the container storage area(s), the modification request shall be made no later than 60 days after the determination is made.
9. Under the provisions of 29 CFR 1910 (51 FR 15,654, December 19, 1986), cleanup operations must meet the applicable requirements of OSHA's Hazardous Waste

Operations and Emergency Response standard. These requirements include hazard communication, medical surveillance, health and safety programs, air monitoring, decontamination and training. General site workers engaged in activities that expose or potentially expose them to hazardous substances must receive a minimum of three days of actual field experience under the direct supervision of a trained experienced supervisor. Managers and supervisors at the cleanup site must have at least an additional eight hours of specialized training on managing hazardous waste operations.

10. If the Illinois EPA determines that implementation of this closure plan fails to satisfy the requirements of 35 IAC 724.211, the Illinois EPA reserves the right to amend the closure plan. Revisions of closure plans are subject to the appeal provisions of Section 40 of the Act.

M. FINANCIAL ASSURANCE

The Permittee shall maintain financial assurance for closure of the container storage area(s) of at least \$610,766.00 (2025 dollars). The financial assurance maintained by the facility shall be sufficient to meet the requirements at 35 IAC 724, Subpart H. The approved financial estimate and financial assurance must be adjusted annually for inflation.

SECTION III: CORRECTIVE ACTION

A. INTRODUCTION

1. In accordance with Section 3004 of RCRA and 35 IAC 724.201, the Permittee shall institute such corrective action as necessary to protect human health and the environment from all releases of hazardous wastes or hazardous constituents from any solid waste management unit (SWMU) and any areas of concern (AOCs) at its facility in Caseyville, Illinois. This section contains the conditions which must be followed to ensure these requirements are met.
2. The Permittee must conduct, as appropriate: (1) a RCRA Facility Investigation (RFI) to characterize each AOC or SWMU of concern at the facility; (2) determine whether releases of hazardous wastes and hazardous constituents have occurred from each AOC or SWMU of concern, and if so, the nature and extent of the release(s); and (3) gather other data, as necessary, to be used in determining the need, scope and design of a Corrective Measures Program (CMP).
3. Based upon the results of the RFI, the Permittee must develop and implement a CMP to protect human health and the environment from any of the SWMUs or AOCs at the facility.
4. The Permittee must provide corrective action, as appropriate, for: (1) any newly discovered SWMUs or AOCs; or (2) future releases for existing SWMUs.
5. The requirements of 35 IAC Parts 620 and 742 must be met, when applicable, in establishing remediation objectives for hazardous waste cleanups. In addition, all hazardous waste cleanup efforts must meet the requirements of 35 IAC 724.201.
6. The Permittee must carry out interim measures in accordance with the terms, conditions and requirements of this permit, as appropriate, to address existing contamination at the facility until such time as a final corrective measure can be developed and implemented.
7. The Permittee must incorporate, as necessary, climate change resilience and adaptation considerations into the hazardous waste cleanups required at this facility.
8. All Illinois EPA final decisions regarding RCRA corrective action at this facility are subject to the appeal provisions of the Illinois Environmental Protection Act (Act).

9. The original RCRA Permit was issued by Illinois EPA for this facility on June 28, 1994; Section V of this original RCRA Permit contained corrective action requirements. As required by this original RCRA Permit, the facility conducted a Phase I RCRA Facility Investigation for four SWMUs. On May 8, 1996, Illinois EPA determined that no further action was necessary, based on the results of this investigation.

B. CORRECTIVE ACTION REQUIREMENTS

The Permittee must conduct and complete a RCRA Facility Investigation (RFI), as necessary, to determine the nature and extent of releases of hazardous wastes and hazardous constituents from various SWMUs/AOCs, identified below at the facility.

Phase I will define whether a release from the SWMU has occurred to the environmental media of concern. Phase II will define the nature and extent of any release from the SWMU to soil, groundwater, and surface water/sediments.

In general, the RFI must be carried out in accordance with the following requirements:

1. The SWMUs requiring RFI at the facility as identified in the original Permit were:
 - a. An oil spill area (SWMU 11);
 - b. A mineral spirits spill area (SWMU 13);
 - c. A stormwater retention basin (SWMU 15);
 - d. A storm sewer sump and the drain line between the sump and the stormwater retention basin (SWMU 16);
 - e. Two 20,000-gallon aboveground tanks for storing used oil and oily water (SWMU A); and
 - f. Two 15,000-gallon aboveground tanks for storing used oil and oily water (SWMU B).
2. SWMUs A and B are non-hazardous waste management units which were regulated under Permit No. 1991-019-DE/OP and included in the Corrective Action section of the previous RCRA Permit (Section V of B-87R and associated modifications) as requiring closure. The Permittee must conduct RFI for these SWMUs under the Corrective Action requirements of this Permit.

3. Conduct additional investigation and remediation, as necessary, to address any on-site contamination and off-site contamination, which has migrated beyond the property boundaries from the former operation of the facility;
4. Obtain “No Further Action” (NFA) determinations from the Illinois EPA for the SWMUs/AOCs/facility and any other impacted areas identified during the hazardous waste cleanup, where the contamination has migrated off-site from the former operation of the facility, when sufficient information has been provided by the Permittee that the media of interest has been adequately remediated for the SWMUs and other identified areas of concern.
5. Condition III.C. below includes the facility’s corrective action efforts that have been completed to date. Condition III.D. below includes the required corrective action that must still be completed at the facility.

C. CORRECTIVE ACTION EFFORTS COMPLETED TO DATE

1. A RFI Phase I Workplan for the SWMUs 11, 13, 15, and 16 identified in Condition III.B.1 was approved by Illinois EPA on April 11, 1995.
2. A report documenting the results of the Phase I RFI was approved by Illinois EPA on May 8, 1996. Based upon the results of this investigation, Illinois EPA determined that NFA was necessary at these units.

D. HAZARDOUS WASTE CLEANUP EFFORTS STILL TO BE COMPLETED

1. A RFI Phase I Workplan is required for the following SWMUs within 60 days of the effective date of this Permit:
 - a. Two 20,000-gallon aboveground tanks for storing used oil and oily water;
 - b. Two 15,000-gallon aboveground tanks for storing used oil and oily water.
2. RFI must be conducted in general accordance with Attachment F of this Permit.
3. The following are hazardous waste management units (HWMU) which must eventually be closed in accordance with Section II of this Permit:
 - a. Service Center Container Storage Area;
 - b. Accumulation Center Container Storage Area;
 - c. Truck Station area.

E. CORRECTIVE MEASURE REQUIREMENTS

1. If it is determined that corrective measures must be taken at a SWMU or AOC, then the Permittee must implement a Corrective Measures Program (CMP) for such SWMUs. The corrective measures implemented by the Permittee must be sufficient to ensure the appropriate requirements of 35 IAC Parts 302, 620, 724, and 742 are met.
2. The types of corrective measures which may be implemented include, but are not limited to:
 - a. Removal of the contaminants or the contaminated media so that the remaining media meet remediation objectives developed in accordance with 35 IAC Part 742;
 - b. Closing the SWMU as a landfill by establishing a proper final cover over the SWMU and then providing proper long-term monitoring/maintenance/management of: (1) leachate; (2) subsurface gas; (3) final cover system; and (4) groundwater;
 - c. Establishing engineered barriers to restrict exposure to the contaminants remaining at the SWMU or AOC (necessary to certain remediation objectives developed in accordance with 35 IAC Part 742);
 - d. Establishing institutional controls to restrict activities at the facility, as necessary, to support remediation objectives established in accordance with 35 IAC Part 742.
3. The CMP consists of five phases:
 - a. Phase I--conceptual design of the selected corrective measure;
 - b. Phase II--development of the final design plans for the corrective measure, including installation and operation/maintenance plans;
 - c. Phase III--actual construction/installation/implementation of the corrective measure;
 - d. Phase IV--operation/maintenance/monitoring, as necessary, of the corrective measure to ensure it is being properly implemented and is properly protecting human health and the environment.

- e. Phase V--demonstration/verification that the corrective measure has been completed and that the established remediation objectives have been achieved.
 - f. Phases may be combined or skipped, depending on the actual corrective measure selected. The overall CMP implemented at a given SWMU must: (1) be logical in nature: and (2) allow for Illinois oversight and approval throughout the entire process. As such, it will be necessary for the Permittee to submit workplans/reports regarding all aspects of corrective measures for Illinois EPA review and approval prior to carrying out any corrective measure activity.
- 4. A Phase I CMP report, or its equivalent, must be submitted to Illinois EPA within 90 days of the date that Illinois EPA notifies the Permittee of the need for a CMP.
 - 5. Subsequent CMP reports must be submitted to Illinois EPA for review and approval in accordance with a schedule approved by Illinois EPA.
 - 6. Once all corrective measures have been completed, a report must be developed documenting all efforts and results associated with the completed measure, including, as appropriate, information demonstrating the approved remediation objectives for the project have been achieved.

F. REQUIREMENTS FOR ADDRESSING NEWLY IDENTIFIED SWMU(S) AND AOC(S)

- 1. The Permittee shall notify the Illinois EPA in writing of any newly-identified SWMU(s) and/or AOC(s) discovered during the course of groundwater monitoring, field investigations, environmental audits, or other means, no later than 30 days after discovery. The notification shall provide the following information, as available:
 - a. The location of the newly-identified SWMU or AOC in relation to other SWMUs on a scaled map or drawing;
 - b. The type and past and present function of the unit;
 - c. The general dimensions, capacities, and structural description of the unit (available drawings and specifications provided);
 - d. The period during which the unit was operated;
 - e. The specifics on all materials, including but not limited to, wastes and hazardous constituents, that have been or are being managed at the SWMU/AOC, to the extent available; and

- f. The results of any relevant available sampling and analysis which may aid in determining whether releases of hazardous wastes or hazardous constituents have occurred or are occurring from the unit.
2. If the submitted information demonstrates a potential for a release of hazardous waste or hazardous waste constituents from the newly identified SWMU/AOC, the Illinois EPA may request in writing, that the Permittee prepare a SWMU Assessment Plan and a proposed schedule of implementation and completion of the Plan for any additional SWMU(s) discovered subsequent to the issuance of this permit. This SWMU Assessment Plan must also propose investigations, including field investigations, if necessary, to determine the release potential to specific environmental media for the newly identified SWMU/AOC. The SWMU Assessment Plan must demonstrate that the sampling and analysis program, if applicable, is capable of yielding representative samples and must include parameters sufficient to identify migration of hazardous waste and hazardous constituents from the newly identified SWMU/AOC to the environment.
3. Within 90 days after receipt of the Illinois EPA's request for a SWMU Assessment Plan, the Permittee must submit a SWMU Assessment Plan to the Illinois EPA for review and approval.
4. After the Permittee submits the SWMU Assessment Plan, the Illinois EPA must either approve, conditionally approve, or disapprove the Plan in writing. If the Plan is approved, the Permittee must begin to implement the Plan within 45 days of receiving such written notification or according to the terms and schedule established within the Plan and any conditions placed on it. If the Plan is disapproved, the Illinois EPA must notify the Permittee in writing of the Plan's deficiencies and specify a due date for submittal of a revised plan..
5. The Permittee must submit a report documenting the results of the approved SWMU Assessment Plan to the Illinois EPA in accordance with the schedule in the approved SWMU Assessment Plan. The SWMU Assessment Report must describe all results obtained from the implementation of the approved SWMU Assessment Plan..
6. Additional investigation plans and reports must be submitted to and approved by the Illinois EPA, as necessary, to ensure the nature and extent of contamination at the SWMU/AOC is adequately characterized. Once the contamination is characterized, the Permittee must develop remedial objectives for the SWMU/AOC in accordance with 35 IAC Parts 742 and 620; such objectives are subject to the Illinois EPA review and approval.

7. The Permittee must implement a CMP, as necessary, to properly address any contamination encountered during the assessment. Guidance regarding the implementation of this program will be provided at the time the Illinois EPA notifies the Permittee of the need for such a program.
8. All efforts carried out at newly identified SWMUs/AOCs must meet the requirements of 35 IAC 724.201.

G. FUTURE RELEASES FROM SWMUS

There exists a potential that a release may occur in the future from SWMUs identified in the RCRA Facility Assessment (RFA) which did not require any corrective action at the time that the RFA or RFI was completed. If the Permittee discovers that a release has occurred from such a SWMU in the future, then the Illinois EPA must be notified of this release within 30 days after its discovery following the procedures set forth in Condition III.F.1. Additional investigation and, as necessary, corrective measures efforts at this SWMU must be carried out in accordance with the procedure set forth in Condition III.E. The results of all corrective action efforts required by this condition must meet the requirements of 35 IAC 724.201.

H. INTERIM MEASURES/STABILIZATION

The Permittee must carry out interim measures/stabilization activities to prevent or mitigate the migration of a release of hazardous substances into the environment, and to provide adequate protection to human health and the environment.

1. At any time during the corrective action process, the Permittee may initiate interim measures for the purpose of preventing continuing releases and/or mitigating the results of releases and/or mitigating the migration of hazardous wastes or hazardous constituents. It must not be necessary to conduct all phases of a RFI or a CMS prior to implementing an interim measure if the Illinois EPA and the Permittee agree that a problem can be corrected, or a release cleaned up, without additional study and/or without a formal Corrective Measures Study(CMS).
2. Prior to implementing any interim measures, the Permittee must submit detailed information regarding the proposed interim measure to the Illinois EPA for approval. This information must include, at a minimum:
 - a. Objectives of the interim measures: how the measure is mitigating a potential threat to human health and the environment and/or is consistent with and integrated into any long-term solution at the facility;

- b. Design, construction, and maintenance requirements;
 - c. Schedules for design and construction; and
 - d. Schedules for progress reports.
3. If the Illinois EPA determines that a release cannot be addressed without additional study and/or a formal CMS, then the Illinois EPA will notify the Permittee that these must be performed. Any proposal made under this provision or any other activity resulting from such proposal, including the invocation of dispute resolution, must not affect the schedule for implementation of the other corrective action efforts being carried out at the facility or of any other portion of the permit.
4. If the Illinois EPA determines that interim measures are necessary to protect human health or the environment, the Permittee will be notified by way of a permit modification.
5. Consistent with the annual reporting requirements of this permit, the Permittee must submit a report assessing the effectiveness of any interim measures being carried out in accordance with this permit. Based on a review of this report, the Illinois EPA reserves the right to require additional interim measures be carried out if it is determined that the interim measure is unable to protect human health and the environment. This annual report should at a minimum contain the following information regarding each system which comprises the interim measure:
- a. A discussion of each system's operation during the year. This discussion should address: (1) actual daily, weekly and monthly flow rates through each system; (2) any periods when the systems were not operating; and (3) deviations from the design operating procedures for the system (such as problems with drawing an adequate vacuum, downtime due to equipment failure, etc.);
 - b. Results of all monitoring efforts carried out during the year;
 - c. A discussion of the effectiveness of the system supported as appropriate with data and calculations; and
 - d. Recommended changes, if any, which should be made to the system to improve its effectiveness.
6. The Illinois EPA reserves the right to require the Permittee to remove or treat soil if the Illinois EPA determines that contaminants are present in the soils at levels such that the remediation system is unable to protect human health and the

environment. Remediation objectives for corrective measures will be established by the Illinois EPA at a later date.

7. The interim measure approved for a SWMU may not be sufficient to meet the final requirements for corrective action for remediation for the unit. The adequacy of the interim measure will be addressed upon the Illinois EPA review and approval of the RFI reports and the CMP, as required by this permit. As such, the Permittee may be required to expand this interim measure as necessary to address existing or additional contamination detected through RFI investigations.
8. The Illinois EPA reserves the right to require revision and modification of the interim measures implemented by the facility should it be determined by the Illinois EPA through information obtained through facility monitoring that the interim measures approved by this portion of the permit are ineffective in protecting human health and the environment.

I. FINANCIAL ASSURANCE FOR CORRECTIVE ACTION

1. The Permittee shall prepare a cost estimate for the completion of any corrective action required under this Permit, in order to provide financial assurance for completion of corrective action, as required under 35 IAC 724.201(b). Such a cost estimate will be based upon the cost of contamination investigations and assessments for the SWMU(s), and design, construction, operation, inspection, monitoring, and maintenance of the corrective measure(s) to meet the requirements of 35 IAC 724.201 and this Permit. This cost estimate must be included in each workplan or report submitted to Illinois EPA, including those required by Conditions III.D, III.F, or III.G.
2. The Permittee shall demonstrate continuous compliance with 35 IAC 724.201 by providing documentation of financial assurance using a mechanism specified in 35 IAC 724.243, in at least the amount of the cost estimate required under Condition II.M. The words "completion of corrective action" shall be substituted for "closure and/or post-closure", as appropriate in the financial instrument specified in 35 IAC 724.251. This documentation shall be submitted to the Illinois EPA within 60 days after the Illinois EPA's approval of the initial or revised cost estimates required under Condition III.I.1. The Illinois EPA may accept financial assurance for completion of corrective action in combination with another financial mechanism that acceptable under 35 IAC 724.246 at its discretion.

SECTION IV: STANDARD CONDITIONS

GENERAL REQUIREMENTS

1. **EFFECT OF PERMIT.** The existence of a RCRA Permit shall not constitute a defense to a violation of the Environmental Protection Act or Subtitle G, except for development, modification or operation without a Permit. Issuance of this Permit does not convey property rights or any exclusive privilege. Issuance of this Permit does not authorize any injury to persons or property or invasion of other private rights, or infringement of state or local law or regulations. (35 IAC 702.181)
2. **PERMIT ACTIONS.** This Permit may be modified, reissued or revoked for cause as specified in 35 IAC 703.270 through 703.273 and Section 702.186. The filing of a request by the Permittee for a permit modification or reissuance, or a notification of planned changes or anticipated noncompliance on the part of the Permittee does not stay the applicability or enforceability of any Permit condition. (35 IAC 702.146)
3. **SEVERABILITY.** The provisions of this Permit are severable, and if any provision of this Permit, or the application of any provision of this Permit to any circumstance is held invalid, the application of such provision to other circumstances and the remainder of this Permit shall not be affected thereby. (35 IAC 705.202)
4. **PERMIT CONDITION CONFLICT.** In case of conflict between a special Permit condition and a standard condition, the special condition will prevail. (35 IAC 702.160)
5. **DUTY TO COMPLY.** The Permittee shall comply with all conditions of this Permit except for the extent and for the duration such noncompliance is authorized by an emergency Permit. Any Permit noncompliance constitutes a violation of the Environmental Protection Act and is grounds for enforcement action; Permit revocation or modification; or for denial of a Permit renewal application. (35 IAC 702.141 and 703.242)
6. **DUTY TO REAPPLY.** If the Permittee wishes to continue an activity allowed by this Permit after the expiration date of this Permit, the Permittee must apply for a new Permit at least 180 days before this Permit expires, unless permission for a later date has been granted by the Illinois EPA. (35 IAC 702.142 and 703.125)
7. **PERMIT EXPIRATION.** This Permit and all conditions herein will remain in effect beyond the Permit's expiration date if the Permittee has submitted a timely, complete application (see 35 IAC 703.181-703.209) and through no fault of the Permittee the Illinois EPA has not issued a new Permit as set forth in 35 IAC 702.125.

8. NEED TO HALT OR REDUCE ACTIVITY NOT A DEFENSE. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this Permit. (35 IAC 702.143)
9. DUTY TO MITIGATE. In the event of noncompliance with the Permit, the Permittee shall take all reasonable steps to minimize releases to the environment and shall carry out such measures as are reasonable to prevent significant adverse impacts on human health or the environment. (35 IAC 702.144)
10. PROPER OPERATION AND MAINTENANCE. The Permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the Permittee to achieve compliance with the conditions of this Permit. Proper operation and maintenance includes effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory, and process controls, including appropriate quality assurance procedures. This provision requires the operation of back-up or auxiliary facilities or similar systems only when necessary to achieve compliance with the conditions of the Permit. (35 IAC 702.145)
11. DUTY TO PROVIDE INFORMATION. The Permittee shall furnish to the Illinois EPA, within a reasonable time, any relevant information which the Illinois EPA may request to determine whether cause exists for modifying, revoking and reissuing or terminating this Permit, or to determine compliance with this Permit. The Permittee shall also furnish to the Illinois EPA, upon request, copies of records required to be kept by this Permit. (35 IAC 702.148)
12. INSPECTION AND ENTRY. The Permittee shall allow an authorized representative of the Illinois EPA, upon the presentation of credentials and other documents as may be required by law, to:
 - a. Enter at reasonable times upon the Permittee's premises where a regulated facility or activity is located or conducted, or where records must be kept under the conditions of this Permit;
 - b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this Permit;
 - c. Inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this Permit; and

- c. Sample or monitor, at reasonable times, for the purposes of assuring permit compliance or as otherwise authorized by the appropriate Act, any substances or parameters at any location. (35 IAC 702.149)

13. MONITORING AND RECORDS. (35 IAC 702.150)

- a. Samples and measurements taken for the purpose of monitoring shall be representative of the monitored activity. The method used to obtain a representative sample of the waste must be the appropriate method from Appendix A of 35 IAC 721. Laboratory methods must be those specified in Test Methods for Evaluating Solid Waste: Physical/Chemical Methods, SW-846, latest versions; Methods for Chemical Analysis of Water and Wastes, EPA-600/4-79-020, latest versions; or an equivalent method as specified in the approved Waste Analysis Plan.
- b. The Permittee shall retain records of all monitoring information, including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, copies of all reports and records required by this Permit, and records of all data used to complete the application for this Permit for a period of at least 3 years from the date of the sample, measurement, report or application. These periods may be extended by request of the Illinois EPA at any time. The Permittee shall maintain records from all groundwater monitoring wells and associated groundwater surface elevations, for the active life of the facility, and for disposal facilities for the post closure care period as well.
- c. Records of monitoring information shall include:
 - i. The date(s), exact place, and time of sampling or measurements;
 - ii. The individual(s) who performed the sampling or measurements;
 - iii. The date(s) analyses were performed;
 - iv. The individual(s) who performed the analyses;
 - v. The analytical technique(s) or method(s) used; and
 - vi. The result(s) of such analyses. (35 IAC 702.150)

14. REPORTING PLANNED CHANGES. The Permittee shall give notice to the Illinois EPA as soon as possible of any planned physical alterations or additions to the permitted facility. In general, proposed changes to the facility will need to be submitted to the

Illinois EPA as Permit modification request that complies with the requirements of 35 IAC 703.280. (35 IAC 702.152(a))

15. CONSTRUCTION CERTIFICATION. For a new hazardous waste management facility, the Permittee shall not commence treatment, storage or disposal of hazardous waste; and for a facility being modified the Permittee shall not treat, store or dispose of hazardous waste in the modified portion of the facility, until:

- i. The Permittee has submitted to the Illinois EPA by certified mail or hand delivery a letter signed by the Permittee and a registered professional engineer stating that the facility has been constructed or modified in compliance with the Permit; and
- ii. The Illinois EPA has inspected the modified or newly constructed facility and finds it is in compliance with the condition of the Permit; or

If, within 15 days of the date of submission of the letter in paragraph (a), the Permittee has not received notice from the Illinois EPA of its intent to inspect, prior inspection is waived and the Permittee may commence treatment, storage or disposal of hazardous waste. (35 IAC 703.247)

16. ANTICIPATED NONCOMPLIANCE. The Permittee shall give advance written notice to the Illinois EPA of any planned changes in the permitted facility or activity which may result in noncompliance with Permit requirements, regulations, or the Act (35 IAC 702.152(b)).

17. TRANSFER OF PERMITS. This Permit may not be transferred by the Permittee to a new owner or operator unless the Permit has been modified or reissued pursuant to 35 IAC 703.260(b) or 703.272. Changes in the ownership or operational control of a facility must be made as a Class 1 modification with the prior written approval of the Illinois EPA. The new owner or operator shall submit a revised Permit application no later than 90 days prior to the scheduled change. (35 IAC 703.260).

18. MONITORING REPORTS. Monitoring results shall be reported at the intervals specified in the Permit. (35 IAC 702.152(d))

19. COMPLIANCE SCHEDULES. Reports of compliance or noncompliance with, or any progress reports on, interim and final requirements contained in any compliance schedule of this Permit shall be submitted no later than specified in 35 IAC 702.162. (35 IAC 702.152(e))

20. TWENTY-FOUR HOUR REPORTING.

- a. The Permittee shall report to the Illinois EPA any noncompliance with the Permit

which may endanger health or the environment. Any such information shall be reported verbally within 24 hours from the time the Permittee becomes aware of the following circumstances. This report shall include the following:

- i. Information concerning the release of any hazardous waste that may cause an endangerment to public drinking water supplies.
 - ii. Information concerning the release or discharge of any hazardous waste or of a fire or explosion at the hazardous waste management facility, which could threaten the environment or human health outside the facility.
- b. The description of the occurrence and its cause shall include:
- i. Name, address, and telephone number of the owner or operator;
 - ii. Name, address, and telephone number of the facility;
 - iii. Date, time, and type of incident;
 - iv. Name and quantity of material(s) involved;
 - v. The extent of injuries, if any;
 - vi. An assessment of actual or potential hazards to the environment and human health outside the facility, where applicable; and
 - vii. Estimated quantity and disposition of recovered material that resulted from the incident.
- c. A written submission shall also be provided within 5 days of the time the Permittee becomes aware of the circumstances. The written submission shall contain a description of the noncompliance and its cause; the period of noncompliance including exact dates and times and if the noncompliance has not been corrected; the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent recurrence of the noncompliance. The Illinois EPA may waive the five day written notice requirement in favor of a written report within 15 days. (35 IAC 702.152(f) and 703.245(c))
21. OTHER NONCOMPLIANCE. The Permittee shall report all instances of noncompliance not otherwise required to be reported under Standard Conditions 17, 18, and 19, at the time monitoring reports, as required by this Permit, are submitted. The reports shall contain the information listed in Standard Condition 20. (35 IAC 702.152(g))

22. OTHER INFORMATION. Where the Permittee becomes aware that it failed to submit any relevant facts in the Permit application or submitted incorrect information in a Permit application or in any report to the Illinois EPA, the Permittee shall promptly submit such facts or information. (35 IAC 702.152(h)).

23. REPORTING REQUIREMENTS. The following reports required by 35 IAC 724 shall be submitted in addition to those required by 35 IAC 702.152 (reporting requirements):

- a. Manifest discrepancy report: If a significant discrepancy in a manifest is discovered, the Permittee must attempt to reconcile the discrepancy with the waste generator or transporter. If the discrepancy is not resolved within 15 days after receiving the waste, the Permittee must immediately submit to the Illinois EPA a letter describing the discrepancy and attempts to reconcile it and a copy of the manifest or shipping paper at issue. (35 IAC 724.172(b))
- b. Unmanifested waste report: The Permittee must submit to the Illinois EPA within 15 days of receipt of unmanifested waste an unmanifested waste report on EPA form 8700-13B. (35 IAC 724.176)
- c. Annual report: An annual report must be submitted covering facility activities during the previous calendar year. (35 IAC 724.175)

24. SUBMITTAL OF REPORTS OR OTHER INFORMATION. All written reports or other written information required to be submitted by the terms of this Permit shall be sent to:

Illinois Environmental Protection Agency
Bureau of Land #33
Permit Section
2520 West Iles Avenue
Post Office Box 19276
Springfield, Illinois 62794-9276

25. SIGNATORY REQUIREMENT. All Permit applications, reports or information submitted to the Illinois EPA shall be signed and certified as required by 35 IAC 702.126. (35 IAC 702.151)

26. CONFIDENTIAL INFORMATION. Any claim of confidentiality must be asserted in accordance with 35 IAC 702.103 and 35 IAC 161.

27. DOCUMENTS TO BE MAINTAINED AT FACILITY SITE. The Permittee shall maintain at the facility, until closure is complete, the following documents and amendments, revisions and modifications to these documents:

- a. Waste analysis plan as required by 35 IAC 724.113(b) and this Permit.
- b. Personnel training documents and records as required by 35 IAC 724.116(d) and this Permit.
- c. Contingency plan as required by 35 IAC 724.153(a) and this Permit.
- d. Closure plan as required by 35 IAC 724.212(a) and this Permit.
- e. Cost estimate for facility closure as required by 35 IAC 724.242(d) and this Permit.
- f. Operating record as required by 35 IAC 724.173 and this Permit.
- g. Inspection schedules as required by 35 IAC 724.115(b) and this Permit.

28. WASTE MINIMIZATION. The Permittee shall certify at least annually that the Permittee has a program in place to reduce the volume and toxicity of hazardous waste that is generated to the degree determined by the Permittee to be economically practicable, and the proposed method of treatment, storage, or disposal is that practicable method currently available to the Permittee which minimizes the present and future threat to human health and the environment, in accordance with 35 IAC 724.173(b)(9).

GENERAL FACILITY STANDARDS

29. NOTICE OF WASTE FROM A FOREIGN SOURCE. The Permittee who has arranged to receive hazardous waste from a foreign source must notify the Illinois EPA in writing at least four weeks in advance of the date the waste is expected at the facility. (35 IAC 724.112(a))

30. NOTICE OF WASTE FROM OFF-SITE. The Permittee who receives hazardous waste from an off-site source (except where the Permittee is also the generator), must inform the generator in writing that the Permittee has the appropriate Permits for, and will accept, the waste the generator is shipping. The Permittee must keep a copy of this written notice as part of the facility operating record. (35 IAC 724.112(b))

31. GENERAL WASTE ANALYSIS. The Permittee shall comply with the procedures described in the approved waste analysis plan. (35 IAC 724.113)

32. SECURITY. The Permittee shall comply with the security provisions of 35 IAC 724.114(b) and (c).
33. GENERAL INSPECTION REQUIREMENTS. The Permittee shall follow the approved inspection schedule. The Permittee shall remedy any deterioration or malfunction discovered by an inspection as required by 35 IAC 724.115(c). Records of inspections shall be kept as required by 35 IAC 724.115(d).
34. PERSONNEL TRAINING. The Permittee shall conduct personnel training as required by 35 IAC 724.116 and shall maintain training documents and records as required by 35 IAC 724.116(d) and (e).
35. GENERAL REQUIREMENTS FOR IGNITABLE, REACTIVE, OR INCOMPATIBLE WASTE. The Permittee shall comply with the requirements of 35 IAC 724.117.
36. CLOSURE REQUIREMENTS FOR ACCUMULATION AREAS. The Permittee shall close containers storage areas, tanks, drip pads, or containment buildings used for the accumulation of on-site generated hazardous waste in accordance with the requirements identified at 35 IAC 722.117(a)(8).

PREPAREDNESS AND PREVENTION

37. DESIGN AND OPERATION OF FACILITY. The Permittee shall maintain and operate the facility to minimize the possibility of fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment. (35 IAC 724.131)
38. REQUIRED EQUIPMENT. The Permittee shall equip the facility with the equipment set forth in the approved contingency plan, as required by 35 IAC 724.132.
39. TESTING AND MAINTENANCE OF EQUIPMENT. The Permittee shall test and maintain the equipment specified in the contingency plan and this Permit as necessary to assure its proper operation in time of emergency. Such testing and maintenance activities are set forth in the approved inspection schedule. (35 IAC 724.133)
40. ACCESS TO COMMUNICATIONS OR ALARM SYSTEM. The Permittee shall maintain access to the communications or alarm system as required by 35 IAC 724.134.
41. REQUIRED AISLE SPACE. The Permittee shall maintain aisle space as required by 35 IAC 724.135 and National Fire Protection Association (NFPA) requirements.

42. **ARRANGEMENTS WITH STATE AND LOCAL AUTHORITIES AND EMERGENCY RESPONSE CONTRACTORS.** The Permittee shall attempt to make emergency response arrangements with State and local authorities and agreements with State emergency response teams and emergency response contractors and equipment suppliers as required by 35 IAC 724.137. If State or local officials refuse to enter in preparedness and prevention arrangements with the Permittee, the Permittee must document this refusal in the operating record.

CONTINGENCY PLAN

43. **IMPLEMENTATION OF PLAN.** The provisions of the contingency plan must be carried out by the Permittee immediately whenever there is a fire, explosion or release of hazardous waste or hazardous waste constituents which could threaten human health or the environment (35 IAC 724.151(b)). At a minimum, this includes any fire or explosion which occurs in an area where hazardous waste is being managed (treated, stored or disposed) (35 IAC 703.241). Within 15 days of any incident that requires implementation of the contingency plan, the owner or operator must submit a written report to the Illinois EPA as required by 35 IAC 724.156(j).
44. **COPIES OF PLAN.** A copy of the contingency plan, including any revisions, must be maintained at the facility and submitted to all local police and fire departments, hospitals and state and local emergency response teams as required by 35 IAC 724.153.
45. **AMENDMENTS TO PLAN.** The Permittee shall review and immediately amend, if necessary, the contingency plan, as required by 35 IAC 724.154.
46. **EMERGENCY COORDINATOR.** A trained emergency coordinator shall be available at all times in case of an emergency as required by 35 IAC 724.155 and 724.156.

MANIFEST SYSTEM RECORD KEEPING AND REPORTING

47. **MANIFEST SYSTEM.** The Permittee shall comply with the manifest requirements of 35 IAC 724.171, 724.172 and 724.176.
48. **OPERATING RECORD.** The Permittee shall maintain a written operating record at the facility in accordance with 35 IAC 724.173.
49. **ANNUAL REPORT.** The Permittee shall prepare and submit an annual report to the Illinois EPA prior to March 1st of each year in accordance with the requirements of 35 IAC 724.175.

CLOSURE

50. **PERFORMANCE STANDARD.** The Permittee shall close the facility as required by 35 IAC 724.211 and in accordance with the approved closure plan.
51. **AMENDMENT TO CLOSURE PLAN.** The Permittee must amend the closure plan whenever there is a change in the expected year of closure or whenever a change in the facility operation plans or facility design affects the closure plan pursuant to 35 IAC 724.212(c).
52. **NOTIFICATION OF CLOSURE.** The Permittee shall notify the Illinois EPA at least 60 days prior to the date it expects to begin closure. (35 IAC 724.212(d))
53. **TIME ALLOWED FOR CLOSURE.** After receiving the final volume of hazardous waste, the Permittee shall treat or remove from the site all hazardous waste and complete closure activities in accordance with the schedule(s) specified in the closure plan. (35 IAC 724.213)
54. **DISPOSAL AND/OR DECONTAMINATION OF EQUIPMENT.** When closure is completed, the Permittee shall decontaminate and/or dispose of all facility equipment and structures as required by the approved closure (35 IAC 724.214) plan.
55. **CERTIFICATION OF CLOSURE.** When closure is completed, the Permittee shall submit certification to the Illinois EPA in accordance with 35 IAC 724.215 that the facility has been closed as specified by the approved closure plans.
56. **COST ESTIMATE FOR FACILITY CLOSURE.** The Permittee's original closure cost estimate, prepared in accordance with 35 IAC 724.242, must be:
- a. Adjusted for inflation 60 days prior to the anniversary of the date of the establishment of the financial instrument(s) used to comply with Section 724.243. However, if the owner/operator is using financial test or corporate guarantee, it must be updated for inflation within 30 days after close of the firm's fiscal year, and before the submission of updated information to the Illinois EPA as specified in Section 724.243(f).
 - b. Revised no later than 30 days after the Illinois EPA has approved a request to modify the closure plan, if the change in the closure plan increases the cost of closure.
 - c. Kept on record at the facility and updated. (35 IAC 724.242); and
 - d. Made immediately available to Illinois EPA personnel upon Illinois EPA request.

57. **FINANCIAL ASSURANCE FOR FACILITY CLOSURE.** The Permittee shall demonstrate compliance with 35 IAC 724.243 by providing documentation of financial assurance, as required by 35 IAC 724.251, in at least the amount of the cost estimates required by the previous Permit Condition. Changes in financial assurance mechanisms must be approved by the Illinois EPA pursuant to 35 IAC 724.243.

Financial assurance documents submitted to Illinois EPA should be directed to the following address:

Illinois Environmental Protection Agency
Bureau of Land #24
Materials Management and Compliance Section
2520 West Iles Avenue
P.O. Box 19276
Springfield, IL 62794-9276

58. **LIABILITY REQUIREMENTS.** The Permittee shall demonstrate continuous compliance with the requirements of 35 IAC 724.247 and the documentation requirements of 35 IAC 724.251.
59. **INCAPACITY OF OWNERS OR OPERATORS, GUARANTORS, OR FINANCIAL INSTITUTIONS.** The Permittee shall comply with 35 IAC 724.248 whenever necessary.

LAND DISPOSAL RESTRICTIONS

60. **DISPOSAL PROHIBITION.** Any waste identified in 35 IAC Part 728, Subpart C, or any mixture of such a waste with non-restricted wastes, is prohibited from land disposal unless it meets the standards of 35 IAC Part 728, Subpart D, or unless it meets the requirements for exemptions under Subpart C. "Land disposal" means placement in or on the land and includes, but is not limited to, placement in a landfill, surface impoundment, waste pile, injection well, land treatment facility, or vault intended for disposal.
61. **DILUTION PROHIBITION.** The Permittee shall not in any way dilute a restricted waste or residual from treatment of a restricted waste as a substitute for adequate treatment in order to achieve compliance with 35 IAC 728, Subpart D (35 IAC 728.103).
62. **WASTE ANALYSIS.**
- a. The Permittee must test his waste or extract developed, using the test method identified in Appendix I of 40 CFR Part 268, or use knowledge of the waste, to

determine if the waste is restricted from land disposal.

- b. For any waste with treatment standards expressed as concentrations in the waste extract, the Permittee must test the treatment residues or an extract of such residues developed using the test method described in Appendix I of 40 CFR Part 268, to assure that the treatment residues or extract meet the applicable treatment standard.
- c. If the treatment residues do not meet the treatment standards, or if the Permittee ships any restricted wastes to a different facility, the Permittee shall comply with the requirements applicable to generators in 35 IAC 728.107 and 728.150(a)(1).

63. STORAGE RESTRICTIONS

- a. The Permittee shall not store hazardous wastes restricted from land disposal under 35 IAC Part 728, Subpart C unless such wastes are stored only in containers or tanks, and are stored solely for the purpose of the accumulation of such quantities as is necessary to facilitate proper recovery, treatment, or disposal, and: (1) each container is clearly marked to identify its contents and the date each period of accumulation begins; (2) each tank is clearly marked to identify its contents, the quantity of each hazardous waste received, and the date each period of accumulation begins, as required by 35 IAC 728.150.
- b. The Permittee must comply with the operating record requirements of 35 IAC 724.173.

64. NEW DETERMINATIONS OF PROHIBITED WASTES.

Wastes which are prohibited from land disposal under 35 IAC Part 728, Subpart C, or for which treatment standards have been established under 35 IAC 728, Subpart D, subsequent to the date of issuance of this Permit, shall be subject to the Conditions Number 60 through 62 above.

SECTION V: SPECIAL CONDITIONS

A. GENERIC WASTE STREAMS AUTHORIZATIONS PURSUANT TO SECTION 22.10 OF THE ENVIRONMENTAL PROTECTION ACT

1. The Permittee is authorized to accept PIMW, provided the generator complies with the following requirements:
 - a. The waste complies with the acceptance criteria in the approved waste analysis plan;
 - b. The waste is delivered by an Illinois licensed PIMW hauler or an exempt hauler as defined in 35 IAC 1420.15; and
 - c. The waste is accompanied by a manifest, if required.

B. CONTINGENCY PLAN

1. The Contingency Plan must be submitted to all emergency response units within 30 days of the date of issuance of this Permit.
2. The contingency plan must be implemented whenever there is a fire, explosion or spill which involves hazardous waste or which occurs in areas where hazardous waste is treated or stored. This includes spills within the containment system. A spill is any release of material outside the permitted unit, into or outside of the containment system excluding controlled releases into containment pans, buckets, etc., as part of a maintenance operation.
3. The Permittee shall contact the local emergency response entities immediately after implementation of the contingency plan unless the spill is less than one pound of waste immersion cleaner, or 50 gallons of spent antifreeze or spent mineral spirits and it is immediately contained and cleaned up.
 - a. The entities which must be notified include:
 - i. Caseyville Police Department
 - ii. French Village Fire Department
 - iii. Memorial Hospital (Belleville)
 - iv. IESDA (IEMA)
 - v. National Response Center
 - vi. DLPC, FOS -- Collinsville Region (within 24 hours)

- b. The information which must be initially relayed to each entity includes:
 - i. The type of emergency (release, fire or explosion);
 - ii. The type of wastes involved in the emergency and the approximate quantity involved;
 - iii. An initial assessment of the conditions at the site; and whether outside help is needed to properly respond to the situation.
- c. If the Permittee is able to properly respond to the emergency without any aid from the entities identified in Condition V.B.3.a, the Permittee shall notify each of these entities that the emergency situation no longer exists once all required emergency response and cleanup activities have been completed.
4. The Permittee shall keep records that the following information has been provided to the local fire department, the local police department and all other agencies identified in 35 IAC 724.153(b) (Note that this information must be provided to these entities to ensure the requirements of 35 IAC 724.137 are met):
 - a. A list of all hazardous wastes to be stored at the facility (generic name) including the USEPA hazardous waste number;
 - b. A scaled drawing showing the location of all hazardous waste management units at the facility and all other areas where waste is stored at the facility (such as loading/unloading areas, etc.). This scaled drawing must also identify the entrances to the facility, roads within the facility and possible evacuation routes;
 - c. A description of the types of waste stored at each hazardous waste management unit at the facility;
 - d. A description of the procedures used to handle waste at the facility;
 - e. An estimate of the quantity of the various types of waste which may be stored at the facility. An estimate of the typical inventory of wastes at the facility must also be included;
 - f. The following information regarding the properties of the wastes stored at the facility:
 - Name
 - USEPA Hazardous Waste Number

- CAS Number
- IDLH (Immediately Dangerous to Life or Health level)
- TLV (Threshold Limit Value), such as TLV TWA (Time-Weighted Average), TLV STEL (Short-Term Exposure Limit), and TLV C (Ceiling Limit)
- Boiling Point (if applicable)
- Vapor pressure at two temperatures
- NFPA Designation (flammable or combustible)
- Material Safety Data Sheets
- Other appropriate characteristics (such as reactive class, etc.)
- USDOT classification

This information may be provided through submission of Material Safety Data Sheets (MSDSs) or prequalification analyses, if a MSDS does not exist for a waste, for the wastes stored at the facility. MSDS and/or prequalification analyses will be maintained at the facility for wastes managed on a transfer basis.

- g. An identification of the products of incomplete combustion associated with (1) flammable or combustible hazardous wastes stored at the facility and (2) wastes stored at the facility which are hazardous due to the characteristic of ignitability (D001) or reactivity (D003).
5. When requested, the Permittee shall provide documentation to the Illinois EPA that the agreements and arrangements identified below have been made. Where necessary, documentation must be provided that any agency identified in 35 IAC 724.153(b) declined to enter an agreement or arrangement. The specific arrangements and agreements which must be made include:
 - a. Arrangements to familiarize the local police department, local fire departments and other local emergency response teams with the layout of the facility, properties of hazardous wastes handled at the facility and associated hazards, places where facility personnel would normally be working, entrances to and roads inside the facility and possible evacuation routes.
 - b. Agreements designating primary emergency authority to a specific police department and a specific fire department, where more than one police department and fire department might respond to an emergency. Agreements should also be made with the other surrounding police and fire departments to provide support to the primary emergency authorities.
 - c. Agreements with state emergency response teams, emergency response contractors and equipment suppliers.

- d. Arrangements to familiarize local hospitals with the properties of the hazardous wastes handled at the facility and the types of injuries or illnesses which could result from fires, explosions or releases at the facility.
- e. Arrangements to identify a single local emergency response agency as the primary agency which will coordinate activities required by these agencies during an emergency at the facility.

The facility should also attempt to develop emergency plans and coordination agreements with the state and local emergency entities identified above. The detail of the arrangements made with the local and state emergency entities will be dependent upon the types of waste handled at the facility and the potential need for the services of the various entities.

- 6. The Permittee shall attempt to review all components of the contingency plan with the local emergency response entities annually. Copies of the meeting notes and list of attendees shall be placed in the facility's operating record and be available to the Illinois EPA for review upon verbal or written request. Any response or nonresponse by a local emergency response entity to meet shall be documented in the facility's operating record.

C. CORRECTIVE ACTION

- 1. RCRA Facility Investigation (RFI) Phase I Workplan must be submitted for SWMUs A and B to the Illinois EPA for review and approval within 60 days of the effective date of this Permit.
- 2. Cost estimate for corrective action for the purpose of providing financial assurance must be submitted with the RFI Phase I Workplan required in Condition V.C.1.

SECTION VI: REPORTING AND NOTIFICATION REQUIREMENTS

The reporting and notification requirements of each section of the RCRA Permit are summarized below. This summary is provided to highlight the various reporting and notification requirements of this Permit.

SECTION II: CONTAINER STORAGE

Condition	Submittal	Due Date
II.C.29	Daily PIMW Report	Within 24 hours of request
II.C.37	Notify Illinois EPA of completion of closure	Upon completion
II.L.3	Notify Illinois EPA of intent to close the hazardous waste storage unit(s)	45 days prior to commencement of closure
II.L.3	Submit sampling and a analysis plan for review for closure of hazardous waste storage unit(s)	45 days prior to commencement of closure
II.L.8	Submit application for modification of Permit and post closure care plan	No later than 30 days after the determination that the container storage area(s) cannot be clean closed or 60 days after the determination is made prior to closure
II.L.4	Submit certification for closure of the hazardous waste storage unit(s)	Within 60 days after closure is completed

SECTION III: CORRECTIVE ACTION

Condition	Submittal	Due Date
III.D.1	Submit RFI Phase I Workplan	Within 60 days of effective date of permit
III.F.1	Notify of newly discovered SWMU/AOC	Withing 30 days of discovery

Condition	Submittal	Due Date
III.F.3	SWMU Assessment Plan	Within 90 days of Illinois EPA request
III.F.4	Implementation of SWMU Assessment	Within 45 days of approval
III.G	Notification of a release from SWMU	Within 30 days of discovery
III.I.2	Provide financial assurance for revised cost estimate	Within 60 days of Illinois EPA approval

SECTION IV: STANDARD CONDITIONS

Condition	Submittal	Due Date
IV.6	Complete application for new Permit	180 days prior to Permit expiration
IV.11	Information requested by Illinois EPA and copies of records required to be kept by this Permit	Submittal date to be determined by the Illinois EPA
IV.14	Notify Illinois EPA of planned physical alterations or additions	As soon as possible
IV.16	Notify Illinois EPA of changes which may result in Permit noncompliance	As soon as possible
IV.17	Application for Permit modification indicating Permit is to be transferred	At least 90 days prior to transfer date
IV.19	Submission of any information required in a compliance schedule	14 days after each schedule date
IV.20	Report to Illinois EPA any noncompliance which may endanger health or environment	
	by telephone	24 hours after discovery
	in writing	5 days after discovery, unless extended to 15 days by Collinsville

Condition	Submittal	Due Date
		FOS
IV.21	Report all other instances of noncompliance	March 1 st of each year along with Annual Report
IV.29	Notify the Regional Administrative in writing of expected receipt of hazardous waste from a foreign source	4 weeks prior to receipt of waste
IV.42	Attempt to update arrangements with local authorities; document any refusals	At least annually
IV.43	Implementation of Contingency Plan	
	Notify appropriate state and local agencies with designated response roles	As needed
	Notify appropriate local officials	Immediately, if emergency coordinator's assessment indicates evacuation of local area is advisable
	Notify the Illinois EPA (217/782-3637) and Illinois ESDA (217/782-7860) if emergency coordinator determines there has been a release, fire or explosion which could threaten human health or the environment, outside the facility	Immediately after determination made
	Notify Illinois EPA and appropriate state and local authorities, in writing that facility is in compliance with 35IAC 724.156(h)	Prior to resuming operation in affected areas
	Report to Illinois EPA details regarding incident which required implementation of contingency plan	15 days after event
IV.49	Submit annual report required by 35 IAC 724.175	March 1 st of each year
IV.51	Application for Permit modification amending	Within 90 days of discovery of need

Condition	Submittal	Due Date
	closure plan	for modification
IV.52	Notify Illinois EPA that it expects to close	60 days prior to beginning closure
IV.56(a)	Adjust closure cost estimate for inflation	60 days after anniversary date, or 30 days after close of Safety-Kleen's fiscal year
IV.56(b)	Revision of closure cost estimate	As needed, within 90 days of discovery of revision
IV.57	Change in financial assurance mechanism for closure	As needed
IV.58	Change in coverage for sudden and non- sudden accidental occurrences	As needed
IV.59	Notify Illinois EPA of commencement of voluntary or involuntary bankruptcy proceedings	10 days after commencement of proceeding

SECTION V: SPECIAL CONDITIONS

Condition	Submittal	Due Date
V.C.1	Submit RCRA Facility Investigation (RFI) Workplan	60 days from the effective date of this permit

ATTACHMENT A

HAZADOUS WASTES WHICH CAN BE ACCEPTED FOR STORAGE AT THE FACILITY

Safety-Kleen Systems, Inc. (Caseyville Service Centre)

State ID: 1630250007

USEPA ID: ILD981097819

Log No. B-87R2

<u>Hazardous Waste No.</u>	<u>Description of Hazardous Waste</u>
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A. CHARACTERISTICALLY HAZARDOUS WASTE

D001	Solid waste that exhibits the characteristic of ignitability, but is not listed as a hazardous waste.
D002	Solid waste that exhibits the characteristic of corrosivity, but is not listed as a hazardous waste.
D004	Solid waste exhibiting the characteristic of TCLP toxicity for arsenic at 5.0 mg/1 or more.
D005	Solid waste exhibiting the characteristic of TCLP toxicity for barium at 100 mg/1 or more.
D006	Solid waste exhibiting the characteristic of TCLP toxicity for cadmium at 1.0 mg/1 or more.
D007	Solid waste exhibiting the characteristic of TCLP toxicity for chromium at 5.0 mg/1 or more.
D008	Solid waste exhibiting the characteristic of TCLP toxicity for lead at 5.0 mg/1 or more.
D009	Solid waste exhibiting the characteristic of TCLP toxicity for mercury at 0.2 mg/1 or more.
D010	Solid waste exhibiting the characteristic of TCLP toxicity for selenium at 1.0 mg/1 or more.
D011	Solid waste exhibiting the characteristic of TCLP toxicity for silver at 5.0 mg/1 or more.
D012	Solid waste that exhibits the characteristic of TCLP toxicity for endrin at 0.02 mg/l or more.
D013	Solid waste that exhibits the characteristic of TCLP toxicity for lindane at 0.40 mg/l or more.
D014	Solid waste that exhibits the characteristic of TCLP toxicity for methoxychlor at 10.0 mg/l or more.

<u>Hazardous Waste No.</u>	<u>Description of Hazardous Waste</u>
D015	Solid waste that exhibits the characteristic of TCLP toxicity for toxaphene at 0.50 mg/l or more.
D016	Solid waste that exhibits the characteristic of TCLP toxicity for 2,4-D at 10.0 mg/l or more.
D017	Solid waste that exhibits the characteristic of TCLP toxicity for 2,4,5-TP (silvex) at 1.0 mg/l or more.
D018	Solid waste exhibiting the characteristic of TCLP toxicity for benzene at 0.5 mg/1 or more.
D019	Solid waste exhibiting the characteristic of TCLP toxicity for carbon tetrachloride at 0.5 mg/1 or more.
D020	Solid waste that exhibits the characteristic of TCLP toxicity for chlordane at 0.03 mg/l or more.
D021	Solid waste exhibiting the characteristic of TCLP toxicity for chlorobenzene at 100.0 mg/1 or more.
D022	Solid waste exhibiting the characteristic of TCLP toxicity for chloroform at 6.0 mg/1 or more.
D023	Solid waste exhibiting the characteristic of TCLP toxicity for o-cresol at 200.0 mg/1 or more.
D024	Solid waste exhibiting the characteristic of TCLP toxicity for m-cresol at 200.0 mg/1 or more.
D025	Solid waste exhibiting the characteristic of TCLP toxicity for p-cresol at 200.0 mg/1 or more.
D026	Solid waste exhibiting the characteristic of TCLP toxicity for cresol at 200.0 mg/1 or more.
D027	Solid waste exhibiting the characteristic of TCLP toxicity for 1,4 dichlorobenzene at 7.5 mg/1 or more.

<u>Hazardous Waste No.</u>	<u>Description of Hazardous Waste</u>
D028	Solid waste exhibiting the characteristic of TCLP toxicity for 1,2 dichloroethane at 0.5 mg/1 or more.
D029	Solid waste exhibiting the characteristic of TCLP toxicity for 1,1 dichloroethylene at 0.7 mg/1 or more.
D030	Solid waste exhibiting the characteristic of TCLP toxicity for 2,4 dinitrotoluene at 0.13 mg/1 or more.
D031	Solid waste exhibiting the characteristic of TCLP toxicity for heptachlor (and its epoxide at 0.008 13 mg/1 or more.
D032	Solid waste exhibiting the characteristic of TCLP toxicity for hexachlorobenzene at 0.13 mg/1 or more.
D033	Solid waste exhibiting the characteristic of TCLP toxicity for hexachlorobutadiene at 0.5 mg/1 or more.
D034	Solid waste exhibiting the characteristic of TCLP toxicity for hexachloroethane at 3.0 mg/1 or more.
D035	Solid waste exhibiting the characteristic of TCLP toxicity for methyl ethyl ketone at 200.0 mg/1 or more.
D036	Solid waste exhibiting the characteristic of TCLP toxicity for nitrobenzene at 2.0 mg/1 or more.
D037	Solid waste exhibiting the characteristic of TCLP toxicity for pentachlorophenol at 100.0 mg/1 or more.
D038	Solid waste exhibiting the characteristic of TCLP toxicity for pyridine at 5.0 mg/1 or more.
D039	Solid waste exhibiting the characteristic of TCLP toxicity for tetrachloroethylene at 0.7 mg/1 or more.
D040	Solid waste exhibiting the characteristic of TCLP toxicity for trichloroethylene at 0.5 mg/1 or more.

<u>Hazardous Waste No.</u>	<u>Description of Hazardous Waste</u>
D041	Solid waste exhibiting the characteristic of TCLP toxicity for 2,4,5 trichlorophenol at 400.0 mg/1 or more.
D042	Solid waste exhibiting the characteristic of TCLP toxicity for 2,4,6 trichlorophenol at 2.0 mg/1 or more.
D043	Solid waste exhibiting the characteristic of TCLP toxicity for vinyl chloride at 0.2 mg/1 or more.

B. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES

F001	The following spent halogenated solvents used in degreasing: tetrachloroethylene, trichloroethylene, methylene chloride, 1,1,1-trichloroethane, carbon tetrachloride, and chlorinated fluorocarbons: All spent solvent mixtures and blends used in degreasing containing, before use, a total of ten percent or more (by volume) of one or more of the above halogenated solvents or those solvents listed in F002, F004 or F005; and still bottoms from the recovery of these spent solvents and spent solvent mixtures.
F002	The following spent halogenated solvents: tetrachloroethylene, methylene chloride, trichloroethylene, 1,1,1-trichloroethane, chlorobenzene, 1,1,2-trichloro-1,2,2-trifluoroethane, orthodichlorobenzene, trichlorofluoromethane, 1,1,2-trichloroethane, spent solvent mixtures and blends, and the still bottoms from the recovery of these spent solvents and spent solvent mixtures.
F003	The following spent non-halogenated solvents: xylene, acetone, ethyl acetate, ethyl benzene, ethyl ether, methyl isobutyl ketone, n-butyl alcohol, cyclohexanone, methanol, spent solvent mixtures and blends, and the still bottoms from the recovery of these spent solvents and spent solvent mixtures.
F004	The following spent non-halogenated solvents: cresols and cresylic acid, nitrobenzene, spent solvent mixtures and blends, and still bottoms from the recovery of these spent solvents and spent solvent mixtures.
F005	The following spent non-halogenated solvents: toluene, methyl ethyl ketone, carbon disulfide, isobutanol, pyridine, benzene, 2-ethoxyethanol, 2-nitropropane, spent solvent mixtures and blends, and the still bottoms from the recovery of these spent solvents and spent solvent mixtures.

<u>Hazardous Waste No.</u>	<u>Description of Hazardous Waste</u>
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C. HAZARDOUS WASTE FROM SPECIFIC UNUSED ACUTELY TOXIC CHEMICAL PRODUCTS

P001	Warfarin (>0.3%)
P012	Arsenic Trioxide
P042	Epinephrine
P044	Dimethoate
P046	Ethanamine, 1,1 dimethyl-2-phenyl-
P075	Nicotine and salts
P081	Nitroglycerin
P123	Toxaphene
P188	Physostigmine Salicylate
P204	Physostigmine

D. HAZARDOUS WASTE FROM SPECIFIC UNUSED TOXIC CHEMICAL PRODUCTS

U002	Acetone
U003	Acetonitrile
U010	Mitomycin C
U012	Aniline
U026	Chlornaphazine
U034	Chloral
U035	Chlorambucil
U044	Chloroform
U050	Chrysene

<u>Hazardous Waste No.</u>	<u>Description of Hazardous Waste</u>
U052	Cresols
U058	Cyclophosphamide
U059	Daunomycin
U075	Dichlorodifluoromethane
U089	Diethylstilbestrol
U110	Dipropylamine
U112	Ethyl Acetate
U122	Formaldehyde
U128	Hexachlorobutadiene
U129	Lindane
U132	Hexachlorophene
U150	Melphalan
U154	Methanol
U159	Methyl Ethyl Ketone
U162	Methyl Methacrylate
U182	Paraldehyde
U187	Phenacetin
U188	Phenol
U200	Reserpine
U201	Resorcinol
U205	Selenium Sulfide

<u>Hazardous Waste No.</u>	<u>Description of Hazardous Waste</u>
U206	Streptozotocin
U220	Toluene
U236	Trypan Blue
U237	Uracil Mustard
U248	Warfarin (<or=0.3%)
U279	Carbaryl

ATTACHMENT B

INSPECTION SCHEDULE

Safety-Kleen Systems, Inc. (Caseyville Service Centre)

State ID: 1630250007

USEPA ID: ILD981097819

Log No. B-87R2

TABLE I: GENERAL INSPECTION SCHEDULE SECURITY DEVICES

<u>ITEM</u>	<u>INSPECTION ELEMENT/TYPE OF PROBLEM</u>	<u>INSPECTION FREQUENCY</u>
Fence	. Inspect entire perimeter for breaches or damage	Weekly
Gates	. Check for proper gate lock function	Weekly
Warning Signs	. Check for presence of warning signs	Monthly
Lighting System	. Check lights for operability	Monthly

TABLE II: GENERAL INSPECTION SCHEDULE, SAFETY & EMERGENCY EQUIPMENT

Protective Gear (e.g., Helmets, Face Shields, Goggles, Boots, Gloves, Acid Resistant Clothing, Disposable Suits, Disposable Bags*)	. Check accessibility	Monthly
	. Check for adequate supply	Monthly
	. Check for deterioration, damage	Monthly
First Aid Kits	. Check accessibility	Monthly
	. Check for adequate supply	Monthly
Emergency Showers	. Check that units activate and shut off properly	Weekly
	. Check accessibility	Weekly
Internal (Phone or Radio)/External (Phase) Communications Systems	. Check accessibility	Weekly
	. Check for operations	Monthly

<u>ITEM</u>	<u>INSPECTION ELEMENT/TYPE OF PROBLEM</u>	<u>INSPECTION FREQUENCY</u>
Fire Extinguishers	. Check pressure gauge for full charge indication	Monthly
	. Check inspection tag to insure annual maintenance by outside fire service is up-to-date	Monthly
	. Check seal to ensure no one has used extinguisher	Monthly
	. Check to ensure access to units is not blocked	Weekly
Absorbent Supply	. Check for adequate supply	Weekly
Recovery Drums	. Check for adequate supply	Weekly
Other Emergency and Decontamination Equipment	. Check accessibility	Weekly
	. Check for adequate supply	Monthly
	. Check for deterioration/damage	Monthly
Respirators and cartridges	. Check for adequate supply	Monthly
Fire department pull stations	. Check for operability and accessibility, location signs	Monthly

TABLE IV: CONTAINER STORAGE AREA INSPECTION SCHEDULE

Container Storage	. Check for evidence of spilled material on slab, ramps, drains, sumps	Each Operating Day
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<u>ITEM</u>	<u>INSPECTION ELEMENT/TYPE OF PROBLEM</u>	<u>INSPECTION FREQUENCY</u>
	. Check for removal of absorbent materials and cleanup rags	Each Operating Day
	. Check for, cracks and gaps in, or damage to, containment bases, sump and drains and coatings	Weekly
	. Check for erosion, uneven settlement, etc.	Weekly
	. Check for corrosion of grating over drains and sumps	Weekly
	. Check for condition and availability of overpack containers	Weekly
Stored Containers	. Check for drum leaks or swelling	Each Operating Day
	. Check that drums are not open	Each Operating Day
	. Check for proper placement	Each Operating Day
	. Check adequacy of aisle space	Each Operating Day
	. Check height of stacks	Each Operating Day

<u>ITEM</u>	<u>INSPECTION ELEMENT/TYPE OF PROBLEM</u>	<u>INSPECTION FREQUENCY</u>
	. Check capacity not exceeded	Each Operating Day
	. Check for proper labeling	Each Operating Day

ATTACHMENT C

CERTIFICATION OF COMPLETION OF CLOSURE FORM

Safety-Kleen Systems, Inc. (Caseyville Service Centre)

State ID: 1630250007

USEPA ID: ILD981097819

Log No. B-87R2

CERTIFICATION OF COMPLETION OF RCRA CLOSURE

Safety-Kleen Systems, Inc. (1630250007) – St. Clair County

USEPA ID: ILD 981 097 819

RCRA Closure Log No. B-87R2

To meet the requirements of 35 Ill. Adm. Code 724.215, this statement is to be completed by both a responsible officer of the owner/operator (as defined in 35 Ill. Adm. Code 702.126) and by a qualified Illinois licensed professional engineer upon completion of closure of the **UNIT NAME**. Submit one copy of the certification with original signatures and two additional copies.

The hazardous waste management unit, known as the **UNIT NAME**, at **FACILITY NAME** has been closed in accordance with the specifications in the approved closure plan. A report documenting that closure has been carried out in accordance with the approved closure plan is attached.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

A person who knowingly makes a false, fictitious, or fraudulent material statement, orally or in writing, to the Illinois EPA commits a Class 4 felony. A second or subsequent offense after conviction is a Class 3 felony. (415 ILCS5/44(h))

Facility Name

Printed Name of Responsible Officer

**Signature of Owner/Operator
Responsible Officer**

Date

Printed Title of Responsible Officer

Signature of Licensed P.E.

Date

**Printed Name of Licensed P.E. and Illinois
License Number**

Mailing Address of P.E.:

Licensed P.E.'s Seal:

ATTACHMENT D

APPROVED RCRA PERMIT APPLICATION IDENTIFICATION

Safety-Kleen Systems, Inc. (Caseyville Service Centre)

State ID: 1630250007

USEPA ID: ILD981097819

Log No. B-87R2

ATTACHMENT D
Identification of Approved Permit Application

This Permit is based on the information in the approved permit application. The approved permit application consists of the following documents:

<u>Application</u>	<u>Date Received</u>
1. Initial RCRA Permit Application, dated May 14, 2018.	5/15/2018
2. Response to Illinois EPA's May 20, 2025 Notice of Deficiencies (NOD), dated August 15, 2025.	8/18/2025
3. Response to Illinois EPA's April 3, 2026 NOD, dated June 22, 2026.	06/24/2026
4. Additional information received via email consisting of Figures D-1, D-2, B-13, and G-2, dated June 26, 2026.	06/29/2026
5. Additional information (duly signed LPC-PA23 form) dated June 25, 2026.	06/29/2026

ATTACHMENT E

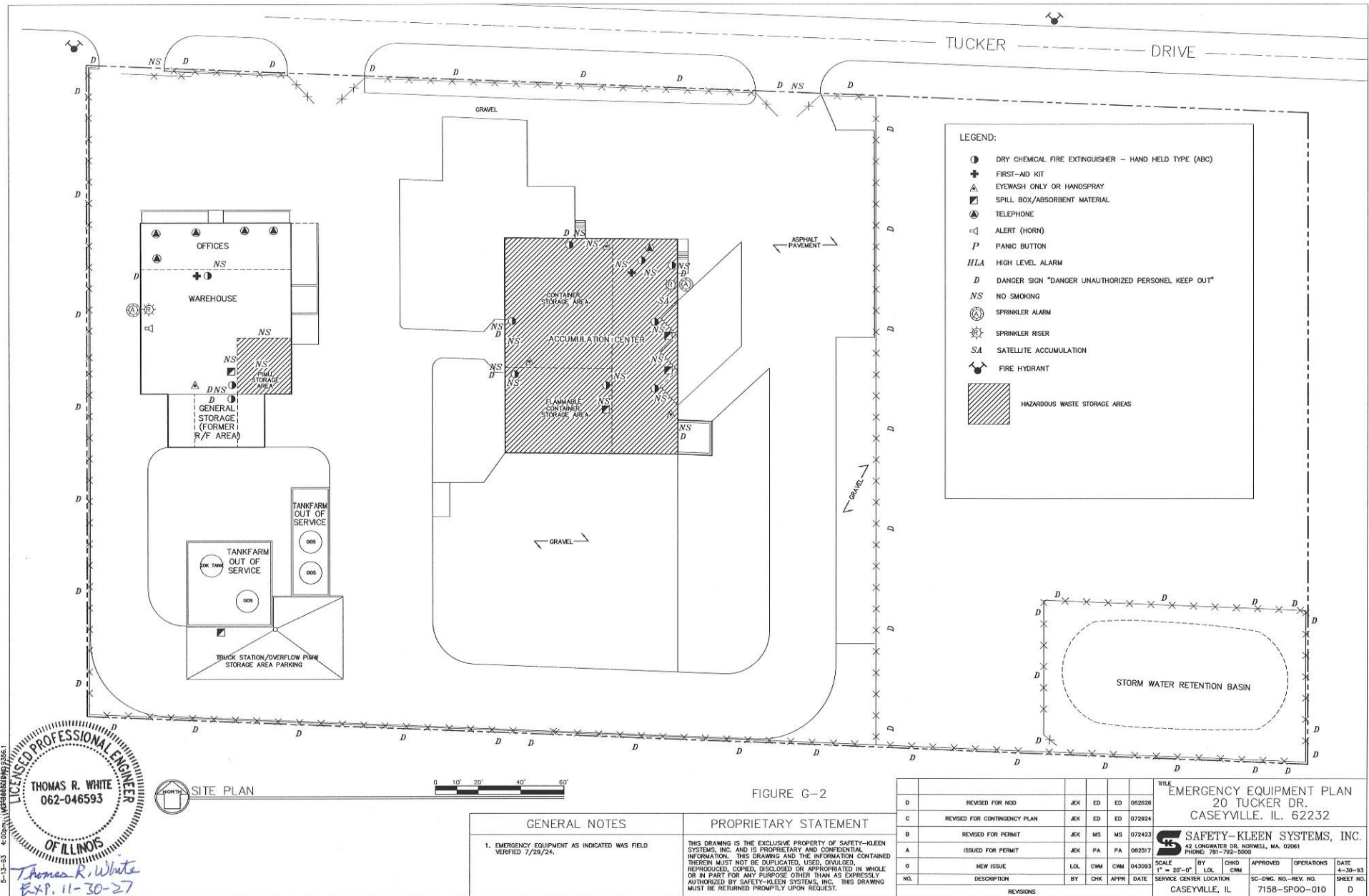
FACILITY LAYOUT MAP

Safety-Kleen Systems, Inc. (Caseyville Service Centre)

State ID: 1630250007

USEPA ID: ILD981097819

Log No. B-87R2



ATTACHMENT F

Scope of Work for a RCRA Facility Investigation

Safety-Kleen Systems, Inc. (Caseyville Service Centre)

State ID: 1630250007

USEPA ID: ILD981097819

Log No. B-87R2

ATTACHMENT F
Scope of Work for a RCRA Facility Investigation

This Scope of Work relates specifically to the RCRA Facility Investigation (RFI) of the solid waste management units identified in Corrective Action section of this permit. In this Scope of Work, "Illinois EPA" refers to the Illinois Environmental Protection Agency Bureau of Land Permit Section, "Permittee" refers to Safety-Kleen Systems, Inc. (Caseyville Service Centre), "SWMU" refers to Solid Waste Management Unit.

I. PURPOSE

The purpose of the RFI is to: (1) characterize each SWMU of concern at the facility; (2) determine the nature and extent of any contamination associated with releases of hazardous waste or hazardous constituents to the environment, from the SWMUs of concern; and (3) gather data necessary to develop and implement a Corrective Measures Program (CMP). Specifically, the information gathered during the RFI will be used to help determine the need, scope and design of a corrective measures program.

II. SCOPE OF WORK

The Scope of Work for the RFI is divided into three phases -- Phases I, II and III.

1. The purpose of Phase I is to provide information on the characteristics and integrity of each unit and conduct field activities, as necessary, to determine if a SWMU(s) at that facility has released, is currently releasing, or has the potential to release hazardous waste and/or hazardous constituents to the any media of concern.
2. Phase II of the RFI will be required if the Illinois EPA determines from the data obtained in Phase I that, for any SWMU, (1) a release has occurred to the any media of concern; (2) a release is occurring to the any media of concern; or (3) the results are inconclusive. The purpose of Phase II is to define the extent of releases to the any media of concern..
3. Phase III will be required if the Illinois EPA determines from the data obtained in Phase I or Phase II that hazardous wastes or hazardous constituents may have migrated to the groundwater in areas not previously investigated for possible groundwater contamination. The purpose of Phase III is to define the extent of releases both on-site and off-site to the ground water from SWMUs identified in Phase I or II to have potentially released hazardous waste or hazardous constituents to the groundwater.

It must be noted that the goals of each phase of an RFI may be somewhat different than those set forth above for those SWMUs that will be closed as landfills and then receive post-closure care. In such cases, the goal of the RFI will be to collect sufficient information to: (1) establish the boundaries and construction details of a final cover system; (2) design post-closure monitoring/maintenance/management programs for leachate, subsurface gas, groundwater and final cover.

Each phase of the investigation is divided into three subparts. The first subpart deals with the development of a RFI Workplan. The second subpart is the implementation of the RFI. The final subpart covers the submission of reports documenting the results of the RFI.

III. RFI WORKPLANS

The Permittee shall prepare a detailed workplan for each phase of the RFI which is reviewed and approved by the Agency prior to conducting that phase of the RFI. The workplan for each phase of the RFI must, at a minimum, contain the information identified in III.A-III.H below. The information in the workplan must be presented in a manner which is similar to the format set forth in these sections. Information provided in each Phase of the RFI may be incorporated into the workplan for the subsequent Phase by reference. Information already submitted in the Part B permit application may also be incorporated by reference into the workplans when appropriate, provided a clear reference is made to the location of the information in the application, including page number and date information was submitted.

A. INTRODUCTION (required for all workplans)

A general discussion of the contents and goals of each workplan must be provided as an introductory portion of the workplan. This introduction should also discuss, in general, the facility and the SWMUs being investigated.

B. ADMINISTRATIVE OUTLINE

The Permittee shall submit as part of the workplan for each phase of the RFI a general outline defining the RFI objectives, technical approach, and scheduling of tasks during that phase of the RFI. The Permittee shall prepare a Project Management Plan as part of each Phase Workplan which will include a discussion of the technical approach, schedules, budget, and personnel. The Project Management Plan must also include a description of the qualifications of personnel performing or directing the RFI, including contractor personnel. This plan shall also document the overall management approach to the current Phase of the RFI.

C. INFORMATION REQUIRED SPECIFICALLY IN THE RFI PHASE 1 WORKPLAN

1. General Facility Information

The following information must be provided, as available, in the Phase I RFI Workplan regarding the facility overall:

- a. A description of the facility, including the nature of its business, both past and present. This description should identify (1) the size and location of the facility, (2) the raw materials used and products manufactured at the facility and (3) the Standard Industrial Code which describes the type of activities carried out at the facility;
- b. Identification of past and present owners;
- c. A discussion of the facility's past and present operations, including solid and hazardous waste generation, storage, treatment and disposal activities;
- d. A brief discussion of each of the SWMUs identified in Corrective Action section of this permit.
- e. A description of all significant surface features (ponds, streams, depressions, etc.) and wells within 1,500 feet of the facility;
- f. A description of all land usage within 1,500 feet of the facility, including all known SWMUs;
- g. Identification of all human populations and environmental systems susceptible to contaminant exposure from releases from the SWMUs within a distance of at least 1,500 feet of the facility;
- h. A description of any interim corrective action measures which were or are being planned or actually being undertaken at the facility;
- i. Approximate dates or periods of past spills or releases, identification of material spilled, location and a description of the response actions, including any inspection reports generated as a result of the spill or release.

j. A current topographic map(s) showing a distance of at least 1,000 feet around the facility and other information described below, and at a scale of one inch equal to not more than 200 feet. Contours shall be shown on the map, with the contour interval being sufficient to clearly show the pattern of surface water flow. If such a map is not available, the workplan shall describe the method for generating the map for inclusion in the Phase I report. The map shall clearly show the following:

1. Map scale, North arrow, date, and location of facility with respect to Township, Range and Section;
2. Topography and surface drainage depicting all waterways, wetlands, 100-year floodplain, drainage patterns, and surface water areas;
3. Property lines, with the owners of all adjacent property clearly indicated;
4. Surrounding land use;
5. Locations and boundaries of (1) all solid waste, including hazardous waste, management units, both past and present, (2) spill areas and (3) other suspected areas of contamination;
6. All injection and withdrawal wells, and
7. All buildings, tanks, piles, utilities, paved areas, easements, rights-of-way, and other features including all known past and present product and waste underground tanks or piping.

The map(s) shall be of sufficient detail and accuracy to locate and report all current and future RFI work performed at the site. The base map(s) shall be submitted in the Phase I report and modified in subsequent reports and workplans as appropriate.

2. Nature and Extent of Contamination

The Phase I Workplan must contain the following information, to the extent known, for each of the units identified in Corrective Action section of the permit:

- a. Location of unit;

- b. The horizontal and vertical boundaries of each unit;
- c. Details regarding the construction, operation and structural integrity of each unit;
- d. A description of all materials managed and/or disposed at each SWMU including, but not limited to, solid waste, hazardous wastes, and hazardous constituents to the extent they are known or suspected over the life of the facility including:
 - (1) Type of waste or hazardous constituents placed in the units, including source, hazardous classification, quantity and chemical composition;
 - (2) Physical and chemical characteristics, including physical form, physical description, general chemical class, cohesiveness of the waste;
- e. Quantities of solid and hazardous wastes managed at the unit;
- f. The history of the utilization of each SWMU and the surrounding areas, including the period of operation and age of the unit;
- g. Methods used to close the unit, if applicable;
- h. All available data and qualitative information on the level of contamination present at the SWMU;
- i. A description of the existing degree and extent of contamination at each unit area.
- j. Identification of additional information which must be gathered regarding 2.a through 2.i above.

3. Integrity Inspection

RFI Phase I Workplan must provide for an evaluation of the structural integrity of the concrete-asphalt as found necessary.

The surfaces of these bases shall be visually inspected, photographed, and any residue adhering to the surface must be removed by scraping and/or brushing. After cleaning the concrete/asphalt surfaces, an independent registered professional engineer shall inspect the integrity of the surfaces. Specifically,

these surfaces must be inspected by the engineer for cracks or other defects which penetrate through the base. In addition, all construction joints must be inspected to ensure they are watertight.

This inspection must be carried out in accordance with standards and recommendations of professional/technical entities such as the American Concrete Institute, the Portland Cement Association, the American Society of Testing and Materials, the American Society of Civil Engineers, etc., which relate to the ability of concrete/asphalt to contain liquids. The results of this inspection shall be (1) submitted in the form of a report, (2) included in the RFI Phase I report required by Corrective Action section of this permit, and (3) certified in accordance with 35 Ill. Adm. Code 702.126 by the engineer. The reports must include (1) the results of the inspection, (2) scaled drawings showing the location of all cracks and construction joints observed during the investigation, (3) conclusions reached regarding any cracks or construction joints observed in the area of concern, (4) justification for the conclusions reached (e.g., information must be provided which indicates that any construction joints in the areas of concern are indeed watertight), and (5) photographs to support the conclusions reached.

If joints, cracks or other defects are found in the base of any SWMU during the inspection required above which would potentially allow hazardous waste or hazardous constituents to migrate through them, then the Phase I Workplan must provide for the collection of soil samples beneath them to determine if hazardous waste or hazardous constituents have been released to the underlying soil.

- a. Samples should be collected from at least one location along each joint or crack that provides a potential for hazardous waste or hazardous constituents to migrate to underlying soil. Such locations shall be biased to stained areas or low-lying areas where spills would tend to accumulate.
- b. Samples should be collected from 0" - 6" below the subgrade/natural soil interface.
- c. Samples must be collected and analyzed in accordance with the procedures set forth in the sampling and analysis plan below.

4. Soil Sampling/Analysis Plan

The Phase I Workplan must provide for a determination of the presence or absence of releases of hazardous waste and hazardous constituents into the soil around and under each SWMU in Corrective Action section of this permit. To meet this requirement, the plan must identify:

- a. The procedures which will be used to describe and characterize the soils in and around the subject SWMU(s) down to the water table, including, but not limited to, the following:
 1. Unified Soil Classification;
 2. Soil profile; and
 3. Elevation of water table;
- b. The parameters and hazardous constituents to be used to establish the presence or absence of contamination. These must include, but are not limited to, specific hazardous constituents of wastes known or suspected to have been managed by the SWMU(s) as identified and determined by the unit characterization information presented in the workplan.
- c. The basis for selecting the parameters and constituents in (b) above.
- d. The methodology for choosing sampling locations, depths, and numbers of samples.
- e. Sampling procedures for each parameter or constituent to be analyzed. Unless detailed procedures are otherwise contained in the workplan, all soil samples collected must be handled in accordance with Test Methods for Evaluating Solid Waste, Third Edition (SW-846) and finalized updates and the Illinois EPA soil volatile sampling procedure if volatiles are to be analyzed.
- f. Analytical methods to be used in the analysis of the samples. The procedures set forth in SW-846 shall be followed. Otherwise a complete description of the methods to be used and the justification for not using the appropriate SW-846 methods must be provided.
- g. Procedures and criteria for evaluating analytical results to establish the presence or absence of any contamination.

5. Hydrogeologic and Hydrologic Investigation Sampling and Analysis Plan

Phase I hydrogeologic and geologic investigation plan must provide descriptions of groundwater monitoring systems which will provide adequate data on the detection, nature, extent and rate, and concentration of any release to the groundwater at the facility as necessary. In general, these SWMUs are either: (1) landfills; (2) surface impoundments; or (3) units where there is known or highly suspected groundwater contamination.

The information which must be provided regarding the Phase I investigation of hydrogeology and hydrology at each SWMU identified above includes:

- a. Information, as it is available, regarding:
 - (1) The regional geologic and hydrogeologic characteristics in the vicinity of the facility, including stratigraphy, hydrogeologic flow and the areas of recharge and discharge.
 - (2) Any topographic or geomorphic features that might influence the groundwater flow system;
 - (3) The hydrogeologic properties of all of the hydrogeologic units found at the site down to the first bedrock aquitard, including: hydraulic conductivity and porosity, texture, uniformity and lithology; and interpretation of hydraulic interconnections between saturated zones, and zones of significant fracturing or channeling in the unconsolidated and consolidated deposits;
 - (4) Using the facility map as a base, isopach and structural contour maps, and at least two (2) geologic cross sections showing the extent (depth, thickness, lateral extent) of all hydrogeologic units within the facility boundary, down to the first bedrock aquitard, identifying: all units in the unconsolidated and consolidated deposits; zones of higher permeability or lower permeability that might direct or restrict the flow of contaminants; perched aquifers; and the first saturated zone that may have a potential for migration of contaminants;
 - (5) The water level or fluid pressure monitoring, including: water level contour maps and vertical gradient sections, well or piezometer hydrographs and interpretation of the flow system,

interpretation of any changes in hydraulic gradients, and seasonal fluctuation; and

- (6) Any man-made influences that may affect the hydrogeology of the site, identifying local water supply and production wells and other man-made hydraulic structures within 1500 feet of the facility boundary.
- b. Procedures for obtaining information identified in above which was not obtained during preparation of the workplan.
 - c. Documentation that sampling and analysis of groundwater monitoring wells will be carried out in accordance with the approved Data Collection Quality Assurance Plan required in below. The Plan shall provide information on the design and installation of all groundwater monitoring wells. The designs shall be in accordance with the latest version of the Technical Enforcement Guidance Document (TEGD), where appropriate, and the latest version of the Illinois EPA design criteria. At a minimum:
 - (1) The groundwater monitoring wells must consist of monitoring wells installed in the uppermost aquifer and in each underlying aquifer (e.g., sand units) which are hydraulically interconnected;
 - (2) At least one background monitoring well in each aquifer shall be installed hydraulically upgradient (i.e., in the direction of increasing static head) from the limit of the SWMUs, except to the extent that SWMUs in close proximity can be investigated with the same background well system. The number, locations, and depths must be sufficient to yield groundwater samples that are (a) representative of background quality in the uppermost aquifer and units hydraulically interconnected beneath the facility and (b) not affected by SWMUs at the subject facility; and
 - (3) Monitoring wells in each appropriate aquifer shall be installed hydraulically downgradient (i.e., in the direction of decreasing static head) at the limit of the SWMU or at the limit of each group of proximate SWMUs. Their number, locations and depths must ensure that they allow for detection of releases of hazardous waste or hazardous constituents from the SWMU(s).
 - d. A sampling plan which specifies:

- (1) The parameters and constituents to be used to establish the presence or absence of a plume of contamination. These must include, but need not be limited to, specific hazardous constituents of wastes determined to have been placed in or released from the SWMUs (including any possible degradation products);
- (2) The basis for selecting the parameters and constituents in (1) above;
- (3) The methodology for investigating the hydrostratigraphic units at site, and the locations, depths, and concentration specifications for each monitoring well;
- (4) Sampling procedures for each parameter or constituent to be analyzed, including sampling frequency;
- (5) Analytical methods to be used in the analysis of the samples. If any of these methods is not consistent with those specified in Test Methods for Evaluating Solid Waste, Physical/Chemical Methods (U.S. EPA SW-846), a complete description of the methods to be used and the justification for not using the appropriate SW-846 methods will be provided; and
- (6) Procedures and criteria for evaluating analytical results to establish the presence or absence of any plume of contamination.

6. Surface Water and Sediment Sampling and Analysis Plan

The Phase I Workplan must provide for a determination of the presence or absence of releases of hazardous wastes and hazardous constituents into all surface waters or their sediments potentially affected by certain SWMUs as necessary. Surface water and sediment investigation must be conducted for those SWMUs in Corrective Action section of this permit which have surface water and/or sediments listed as environmental media of concern. A determination of “no impact” must be justified and documented to the satisfaction of the Illinois EPA. The plan must include, but is not limited to:

- a. A description and characterization of all potentially affected surface waters, including locations, areas, depths, inflows and outflows, volumes of water, seasonal fluctuations, flooding tendencies, drainage patterns, on-site and off-site affected populations and activities.

- b. Descriptions and characterization of sediments associated with all surface waters, including deposition areas, thickness profiles, and physical and chemical parameters;
- c. The parameters and constituents to be used to establish the presence or absence of a plume of contamination. This must include, but need not be limited to, specific hazardous constituents of wastes known or suspected to have managed at the facility or placed in the SWMUs or AOCs ;
- d. The basis for choosing the parameters and constituents in (c) above;
- e. The method for choosing sampling locations, depths, and number of samples;
- f. The analytical methods to be used in the analysis of the samples. If any of these methods are not identical to those specified in Test Methods for Evaluating Solid Waste, Physical/Chemical Methods (SW-846), a complete description of the methods to be used and the justification for not using the SW-846 methods must be provided; and
- g. Procedures and criteria for evaluating analytical results to establish the presence or absence of any plume of contamination.

7. Air Investigation Sampling and Analysis Plan

- (a) The Phase I Workplan must provide for an investigation to characterize the particulate and gaseous contaminants released into the atmosphere from those SWMUs or AOCs as necessary. The workplan must describe the procedures which will be used to obtain the following information:
 - (1) A description of the horizontal and vertical direction and velocity of contaminant movement;
 - (2) The rate and amount of release; and
 - (3) The chemical and physical composition of the contaminants release, including horizontal and vertical concentration profiles.
- (b) The Phase I Workplan must contain information characterizing the climate in the vicinity of the facility. Such information shall include, but not be limited to:

- (1) A description of the following parameters:
 - (a) Annual and monthly rainfall averages;
 - (b) Monthly temperature averages and extremes;
 - (c) Wind speed and directions;
 - (d) Relative humidity and dew point;
 - (e) Atmospheric pressure;
 - (f) Evaporation data;
 - (g) Development and inversions; and
 - (h) Climate extremes that have been known to occur in the vicinity of the facility, and the frequency of occurrence.
- (2) A description of topographic and manmade features which affect air flow and emission patterns, including:
 - (a) Ridges, hills or mountain areas;
 - (b) Canyons or valleys;
 - (c) Surface water bodies;
 - (d) Wind breaks and forests;
 - (e) Building; and
 - (f) Other man-made features.

8. Potential Receptors

The Phase I workplan must contain data describing the human populations and environmental systems within a radius of 1,500 feet of the facility boundary that may be affected by releases from SWMUs must be collected and submitted. The following characteristics shall be identified.

- a. Local uses and possible future uses of groundwater:

- (1) Type of use (e.g., municipal or residential drinking water source, industrial, etc.); and
 - (2) Location of groundwater users, including wells and discharge areas.
- b. Local uses and possible future uses of surface waters draining the facility:
1. Domestic and municipal;
 2. Recreational;
 3. Agricultural;
 4. Industrial; and
 5. Environmental.
- c. Human use of, or access to, the facility and adjacent lands, including, but not limited to:
1. Recreation;
 2. Agriculture;
 3. Residential;
 4. Commercial;
 5. Zoning; and
 6. Location between population locations and prevailing wind direction.
- d. A description of the biota in surface water bodies on, adjacent to, or affected by the facility.
- e. A description of ecology of, and adjacent to, the facility.

- f. A demographic profile of the people who use or have access to the facility and adjacent land, including, but not limited to: age, sex and sensitive subgroups.
- g. A description of any endangered or threatened species near the facility.

D. INFORMATION REQUIRED SPECIFICALLY IN THE RFI PHASE II WORKPLAN

1. Soil Sampling And Analysis Plan

A Phase II Soil Sampling and Analysis plan, if necessary, must describe procedures to determine the nature and extent of hazardous waste and/or hazardous constituents released to the soil. This plan shall address and/or include, at a minimum:

- (a) A description of what is known about the horizontal and vertical extent of contamination;
- (b) A description of relevant contaminant and environmental chemical properties within the affected source area and plume, including solubility, specification absorption, leachability, exchange capacity biodegradability, hydrolysis, photolysis, oxidation and other factors that might affect contaminant migration and transformation (if known);
- (c) Specific contaminant concentrations, if known;
- (d) The horizontal and vertical velocity and direction of contaminant movement (if known);
- (e) An extrapolation of future contaminant movement (if known);
- (f) The methods and criteria to be used to define the boundaries of the plume(s) of contamination;
- (g) The parameters and constituents to be used to establish the presence or absence of a plume of contamination. This must include, but need not be limited to, specific hazardous constituents of wastes known or suspected to have been placed in the SWMU's;
- (h) The basis for selecting the parameters and constituents in (g) above;

- (i) The methodology for choosing sampling locations, depths, and numbers of samples;
- (j) Sampling procedures for each parameter or constituent to be analyzed;
- (k) Analytical methods to be used in the analysis of the samples. If any of these methods are not identical to those specified in SW-846, a complete description of the methods to be used and the justification for not using the SW-846 methods shall be provided; and
- (l) Procedures and criteria for evaluating analytical results to establish the presence or absence of any plume of contamination.

2. Groundwater Investigation

A Phase II groundwater investigation, if necessary, must describe the procedures and methods to determine and identify the horizontal and vertical extent of any contamination detected during the investigation carried out in accordance with Corrective Action section. The RFI Phase II Workplan must include all applicable and relevant information required by Item III. D.1 above of this attachment to determine the extent of the groundwater contaminant plume at the site.

3. Sediment and Surface Water Sampling and Analysis Plan

If the Illinois EPA determines from the data obtained during the Phase I investigation that release of hazardous waste or hazardous constituents have occurred to surface water or sediments or that the data is inconclusive, the Permittee shall submit a Phase II Workplan to characterize the contamination of the surface waters and sediments. The workplan shall include, at a minimum:

- a. A description of the horizontal and vertical extent of any plumes and the extent of contamination in the underlying sediments (if known);
- b. Specific contaminant concentrations (if known);
- c. The horizontal and vertical direction and velocity of contaminant movement (if known);
- d. An evaluation of the physical, biological and chemical factors influencing contaminant movement (if known);
- e. An extrapolation of future contaminant movement (if known); and

- f. The criteria used to define the boundaries of the plume.

4. Air Investigation Sampling and Analysis Plan

A Phase II Sampling and Analysis Plan, if necessary, must describe procedures to determine the nature and extent of hazardous waste and/or hazardous constituents released to the air. This plan shall address and/or include, at a minimum:

- a. A description of what is known about the horizontal vertical extent of contamination;
- b. A description of relevant contaminant and environmental chemical properties within the effected source plume, including solubility, specific absorption, leachability, exchange capacity, biodegradability, hydrolysis, photolysis, oxidation and other factors that might affect contaminant migration and transformation (if known);
- c. Specific contaminant concentrations, if known;
- d. The horizontal and vertical velocity and direction of contaminant movement, if known
- e. An extrapolation of future contaminant movement, if known;
- f. The methods and criteria to be used to define the boundaries of the plume(s) of contamination;
- g. The parameters and constituents to be used to establish the presence or absence of a plume of contamination. This must include, but need not be limited to, specific hazardous constituents of wastes known or suspected to have been placed in the SWMUs;
- h. The basis for selecting the parameters and constituents in (g) above;
- i. The methodology for choosing sampling locations, depths, and numbers of samples;
- j. Sampling procedures for each parameter or constituent to be analyzed;
- k. Analytical methods to be used in the analysis of the samples. If any of these methods are not identical to those specified in Test Methods for

Evaluation Solid Waste, Physical/Chemical methods, Third Edition, (SW-846), a complete description of the methods to be used and the justification for not using the SW-846 Methods shall be provided; and

- I. Procedures and criteria for evaluating analytical results to establish the present or absence of any plume of contamination.

5. Potential Receptors

If (1) a release to air or groundwater is detected, or (2) the Permittee desires to establish site-specific soil cleanup objectives, then the Phase II RFI Workplan must provide data describing the human populations and environmental systems within a radius of 1,500 feet of the facility boundary that may be affected by releases from SWMUs must be collected and submitted to the Agency. The information identified in Section III.C.8 above shall be identified.

E. INFORMATION REQUIRED SPECIFICALLY IN THE RFI PHASE III WORKPLAN

The potential for release to groundwater from a given SWMU which was not evaluated during the Phase I investigation must be investigated as part of the Phase III of the RFI if the Illinois EPA determines from the data obtained during the RFI Phase II investigation that releases to soil from a given SWMU may have migrated to the groundwater below the site, or the data is inconclusive. The RFI Phase III hydrogeologic and geologic investigation plan must provide descriptions of groundwater monitoring systems which will provide adequate data on the detection, nature, extent and rate, and concentration of any releases to groundwater or surface water.

If releases of hazardous waste or hazardous constituents have entered the groundwater at a particular SWMU, the RFI Phase III Workplan shall address a hydrological investigation and groundwater monitoring for a SWMU or group of SWMUs at the time the Agency notifies the Permittee that a RFI Phase III Workplan is required. This workplan must include the information described in Corrective Action section I.C.5 above regarding the required hydrogeology and hydrologic investigation.

F. GROUNDWATER MONITORING PLAN

If the Illinois EPA determines from the data obtained during the Phase I or Phase III investigation that releases of hazardous waste or hazardous constituents have occurred to the groundwater, or that the data are inconclusive, the Permittee will be required to submit a Groundwater Monitoring Plan to determine the vertical and horizontal distribution of the contaminants identified and to predict the long-term disposition of

the contaminants. This groundwater monitoring program will require proposals for establishing the locations, depths, and construction specifications for additional monitoring wells necessary to delineate the extent of any plume. The methodology of the investigation, the sampling procedures, analytical results to establish the extent of the plume shall be the same as that specified above unless otherwise specifically identified by the Agency in writing. The Groundwater Monitoring Plan must also specify the criteria which will be used to determine the limits of the plume.

G. SITE-SPECIFIC SAMPLING PLANS

The Permittee shall prepare detailed site-specific sampling plans to be submitted as part of the work for each phase of the RFI which address all field activities needed to obtain site-specific data. The plans must contain: a statement of sampling objectives, specifications of equipment, analyses of interest, sample types, sample locations and schedules for sampling. Wherever appropriate, sample collection, handling, preservation, preparation and analysis described in Test Methods for Evaluating Solid Wastes, Physical/Chemical Methods, Third Edition (SW-846) and finalized updates. In addition, samples to be analyzed for volatile organic compounds must be collected in accordance with Illinois EPA's Volatile Sampling. The plans must address all levels of the investigations, as well as types of investigations conducted on specific environmental media (i.e., soil, air, surface water, groundwater). The plans must describe in detail how each phase of the RFI will be implemented.

Site-Specific sampling and analysis plan should contain the following informational:

1. Goals and Objectives of Effort - A discussion of the goals and objectives of the sampling/analysis effort should be included in the plan. This will have an impact on the overall plan, as the sampling/analysis effort required to demonstrate that an area is clean is very different than that required to determine the horizontal and vertical extent of contamination.
2. Parameters to be Analyzed - A list of proposed parameters along with a discussion justifying their inclusions should be included in the plan. The proposed parameters should include those hazardous constituents which may be present based upon a knowledge of the wastes managed at the unit and the facility overall. This list should include degradation products. Additional parameters for analysis may be required by the Agency, depending on its review of the wastes and other materials managed at the facility.
3. Sample Locations - A scaled map should be provided in the plan showing the location where the samples are to be collected.

4. Sampling Depth - As appropriate, the sampling should identify the depth from which each sample is to be collected.
5. Sample Collection Procedures - The procedures which will be used to collect the samples must be described in the closure plan. The following should be considered in developing these procedures:
 - a. Sampling methods and equipment should follow guidance in USEPA's TEST METHODS FOR EVALUATING SOLID WASTE, PHYSICAL/CHEMICAL METHODS Third Edition (SW-846) and all finalized updates.
 - b. Field sampling methods not included in SW-846 must be approved by IEPA before they are used in the closure. This includes methods such as drilling, borings, etc. When available, standards procedures, as defined by USEPA, IEPA or ASTM, should be followed.
 - c. Soil and sediment samples collected for volatile organics analysis require specialized sampling and handling procedures, as specified in the Agency's volatile compound sampling procedure. Unless extenuating circumstances dictate otherwise, soil samples collected for volatile organic analysis should not be mixed, composited or otherwise aerated. If extenuating circumstances prevail, then procedures must be made to minimize (1) the time the sample is exposed to the air; (2) aeration of the sample and (3) agitation of the sample. No mixing or compositing of samples should ever take place if they are to be analyzed for VOCs.
 - d. All soil encountered during the sampling effort should be field classified in accordance with ASTM D-2488. Provisions should be made in the plan to make this classification, except for samples collected specifically for VOC analysis.
 - e. If a drill rig or other piece of equipment is necessary to collect soil samples:
 1. The procedures specified in ASTM Method D-1586 (Split Spoon Sampling) or D-1587 (Shelby Tube Sampling) must be used in collecting the samples;
 2. Soil samples should be collected continuously at several locations to provide information regarding the shallow geology of the area where the investigation is being conducted.

- f. Soil and sediments encountered in an area where VOC contamination is a concern should be field-screened for VOCs. However, the actual samples collected for analysis at the laboratory should not be field-screened.
 - g. In general, samples should never be composited.
 - h. The procedures which will be used to decontaminate the sampling equipment after each sample is collected should also be described. Decontamination procedures should be carried out in accordance with SW-846.
 - i. The actual material placed in the container for future analysis should be obtained from any visually contaminated portion of the sample.
- 6. Sample Handling Procedures - The sampling plan should describe the procedures which will be used to store, preserve and transport the collected soil samples to the laboratory, including chain-of-custody procedures. These procedures should be carried out in accordance with the guidance in SW-846.
- 7. Analytical Procedures - The sampling/analysis plan should identify the procedures which will be used to prepare the samples for analysis and to analyze them. In general, such procedures should be carried out in accordance with those set forth in SW-846. The actual portion of the sample to be analyzed should be obtained from visually contaminated material if any is present. The procedures specified must be sufficient to analyze for all the parameters identified in the closure plan. The estimated quantitation limits and/or practical quantitation limits to be achieved should also be identified. Again, these limits should meet the requirements set forth in SW-846. It must be noted that it is especially important to achieve low detection limits if the goal of the sampling/analysis effort is to demonstrate that little or no contamination exists in a given area. To demonstrate a parameter is not present in a sample, the PQL achieved must be at least as low as that specified in SW-846. Low detection limits may not be as necessary when collecting samples in contaminated areas.
- 8. Any additional items required in the other portions of this section regarding the sampling/analysis of specific environmental media.

H. DATA COLLECTION QUALITY ASSURANCE

The Permittee shall prepare a plan which describes the procedures which will be used to carry out and monitor all sampling and analysis efforts to ensure that all information

and data collected are technically sound, statistically valid and properly documented. Such a plan, referred to as a Quality Assurance Project Plan, must be developed using a format in which the fourteen items listed below are discussed in detail:

1. Project Description
2. Project Organization and Responsibility
3. Quality Assurance Objectives for Data Measurements
4. Sampling Procedures
5. Sample Custody
6. Calibration Procedures and Frequency
7. Analytical Procedures
8. Data Reduction, Validation and Reporting
9. Internal Quality Control Audits
10. Performance and System Audits
11. Preventative Maintenance
12. Specific Routine Procedures Used to Assess Data Precision, Accuracy and Completeness
13. Corrective Action
14. Quality Assurance Reports to Management

Of special concern in the development of a QAPP are (1) the use of trip blanks, field blanks and laboratory blanks and (2) calibration and verification of the laboratory procedures and equipment used to analyze the samples. All procedures used in this RFI must meet the requirements of Test Methods for Evaluating Solid Wastes, Third Edition (SW-846) and all finalized updates. As such, the quality assurance/quality control procedures carried out during the RFI must meet the requirements set forth in SW-846.

I. DATA MANAGEMENT PLAN

The Permittee shall develop and initiate a Data Management Plan to document and track investigation data and results. This Plan shall identify and set up data documentation materials and procedures, project file requirements, and project-related progress reporting procedures and documents. The Plan shall also provide the format to be used to present the raw data and conclusions of the investigation(s). This plan shall be submitted with each Phase Workplan.

J. HEALTH AND SAFETY PLAN

Under the provisions of 29 CFR 1910 (54 FR 9,295, March 6, 1989), cleanup operations must meet the applicable requirements of OSHA's Hazardous Waste Operations and Emergency Response standard. These requirements include hazard communication, medical surveillance, health and safety programs, air monitoring, decontamination and training. General site workers engaged in activities that expose or potentially expose them to hazardous substances must receive a minimum of 40 hours of safety and health training off site plus a minimum of three days of actual field experience under the direct supervision of a trained experienced supervisor. Managers and supervisors at the cleanup site must have at least an additional eight hours of specialized training on managing hazardous waste operations. These requirements must be met during each phase of the RFI. A detailed Health and Safety Plan demonstrating that this requirement is met must be contained in the workplan for each phase of the RFI.

IV. IMPLEMENTATION OF RFI

The Permittee shall conduct those investigations necessary to characterize the site, and to determine the nature, rate and extent of migration, and concentrations of hazardous waste and hazardous constituents, if any, released from the SWMU's into the surface water and sediments, groundwater, air, and soil. The investigations must be of adequate technical content to support the development and evaluation of a corrective action program, if one is deemed necessary by the Illinois EPA.

The investigation activities shall follow the plans and procedures set forth in the Workplan(s) and the RFI schedule. Any actual or anticipated deviations from the Workplan(s) or the RFI schedule shall be reported no later than the time of submission of the next quarterly report required by Section V subsequent to the determination of need or actual deviation from the Workplan.

V. SUBMISSION OF WORKPLANS, REPORTS AND RESULTS OF RFI ACTIVITIES

A. QUARTERLY REPORTS

The Permittee must prepare and submit quarterly progress reports **(based on a calendar year)** on the activities and results of each Phase of the RFI activities as appropriate. The progress reports shall contain at a minimum:

1. An estimate of the percentage of the investigation completed;
2. Summary of activities completed during the reporting period;
3. Summaries of all actual or proposed changes to the Workplan or its implementation;
4. Summaries of all actual or potential problems encountered during the reporting period;
5. Proposal for correcting any problems;
6. Projected work for the next reporting period; and
7. Other information or data as requested in writing by the Illinois EPA.

B. GENERAL CONTENTS OF FINAL REPORTS

Reports documenting the results of each phase of the RFI should be developed in accordance with the following:

1. The portion of the report documenting the results of the required soil/air/surface water/sediment/sampling/analysis effort should contain the following:
 - a. A discussion of: (1) the reason for the sampling/analysis effort conducted at each WMU and (2) the goals of the sampling analysis effort conducted at each WMU;
 - b. A scaled drawing showing the horizontal and vertical location where all samples were collected relative to each SWMU and/or other relevant structures;
 - c. Justification for the selected sample locations;
 - d. A description of the procedures used for:

- (1) Sample collection;
 - (2) Sample preservation;
 - (3) Chain of custody; and
 - (4) Decontamination of sampling equipment;
- e. Visual classification of each soil sample collected for analysis;
- f. A discussion of the results of any field screening efforts;
- g. Logs of all soil borings made during the investigation;
- h. A description of the soil types encountered during the investigation, including scaled cross-sections;
- i. A description of the procedures used to analyze the samples, including:
 - (1) The analytical procedure used, including the procedures, if any, used to prepare the sample for analysis;
 - (2) Any dilutions made to the original sample;
 - (3) Any interferences encountered during the analysis of each sample; and
 - (4) The practical quantitation limit (PQL) achieved, including justification for reporting PQLs which are above SW-846 levels.
- j. A description of all quality control/quality assurance analyses conducted, including the analysis of lab blanks, trip blanks and field blanks;
- k. A description of all quality assurance/quality control efforts made overall;
- l. A tabular summary of all analytical data, including QA/QC results;
- m. Copies of the final laboratory sheets which report the results of the analyses, including final sheets reporting QA/QC data;
- n. Colored photographs documenting the sampling effort; and

- o. A discussion of the collected data. This discussion should (1) identify those sample locations where contaminants were detected and the concentrations of the contaminants and (2) evaluate the data collected by comparing the results to remediation objectives developed in accordance with 35 Ill. Adm. Code 742, as appropriate. This discussion should focus on the data collected during the recent investigation and on data previously collected.
 - p. Conclusions which can be reached, based on a review of all information available;
 - q. Recommendations regarding the next steps which need to be taken to ensure corrective action is properly implemented at the facility. Of particular concern is whether the next step is: (1) no further action; (2) execution of some type of corrective measures plan to achieve/support the remediation objectives; or (3) closure of a landfill, followed by long-term post-closure care, including groundwater monitoring and, as necessary, remediation.
2. The portion of the final report documenting the results of the required subsurface and groundwater investigation should contain, at a minimum, the following information for each WMU:
 - a. Logs of the borings made during the required subsurface investigation and/or for monitoring well installation;
 - b. A description of the procedures used in carrying out the subsurface investigation (including the boring procedures) and in any installation of the monitoring wells;
 - c. Results of all tests conducted in-situ or in the laboratory and a discussion of the procedures used in carrying out the tests;
 - d. Completed Illinois EPA Well Completion Reports;
 - e. Scaled drawings showing the location where all borings were made and where all monitoring wells were installed;
 - f. Well development procedures;
 - g. A discussion of the geology and hydrogeology of the areas being investigated, including:

- (1) A detailed description of the geology;
 - (2) Physical characteristics of each geologic strata encountered;
 - (3) Identification of water bearing units encountered;
 - (4) Depth to the water table;
 - (5) The horizontal and vertical components of groundwater flow in the water bearing units;
 - (6) The hydraulic conductivity of the water bearing units.
- h. A minimum of two cross-sections depicting the subsurface geology and hydrogeology. These cross-sections should be as close to perpendicular to each other as possible, so that a three-dimensional presentation of this information can be depicted;
 - i. Information regarding the groundwater sampling/analysis effort as identified in Items 1.a, 1.d, and 1.i through 1.q;
 - j. Water level measurements made prior to the collection of the groundwater samples; and
 - k. Maps and supporting data identifying the piezometric surface of the groundwater beneath the facility and the direction of groundwater flow.