



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

2009 MALL STREET, COLLINSVILLE, ILLINOIS 62234

THOMAS V. SKINNER, DIRECTOR

618/346-5120
FAX: 618/346-5155

October 18, 2001

Prior Oil Company
Attn: John Prior
140 Gompers Street
Wamac, Illinois 62801

Re: 1894925001 -- Washington County
Wamac/Prior Oil Company
Compliance File

Dear Mr. Prior:

On August 30, 2001, your facility was inspected by Chris Cahnovsky and Connie Letsky of the Illinois Environmental Protection Agency. The purpose of this inspection was to determine your facility's compliance with the Illinois Environmental Protection Act and 35 Illinois Administrative Code. At the time of the inspection, apparent violations found in previous inspections conducted on August 22, 2000, November 3, 2000 and December 5, 2000 were again observed.

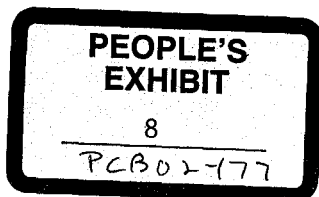
For your information, a copy of this inspection report is enclosed. Please contact Chris Cahnovsky at 618/346-5120 if you have any questions regarding this inspection.

Sincerely,

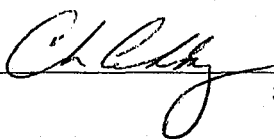
Chris N. Cahnovsky, Regional Manager
Field Operations Section
Bureau of Land

CNC;jlb/priorcontvioltr101801cnc
Enclosure

bc: BOL - Division File
BOL - Collinsville
Todd Rettig - DLC



9.	55(a)	NO PERSON SHALL:	
	(1)	Cause or Allow Open Dumping of Any Used or Waste Tire	
	(2)	Cause or Allow Open Burning of Any Used or Waste Tire	
35 ILLINOIS ADMINISTRATIVE CODE REQUIREMENTS SUBTITLE G			
10.	812.101(a)	FAILURE TO SUBMIT AN APPLICATION FOR A PERMIT TO DEVELOP AND OPERATE A LANDFILL	X
11.	722.111	HAZARDOUS WASTE DETERMINATION	
12.	808.121	SPECIAL WASTE DETERMINATION	
13.	809.302(a)	ACCEPTANCE OF SPECIAL WASTE FROM A WASTE TRANSPORTER WITHOUT A WASTE HAULING PERMIT, UNIFORM WASTE PROGRAM REGISTRATION AND PERMIT AND/OR MANIFEST	
OTHER REQUIREMENTS			
14.		APPARENT VIOLATION OF: () PCB; () CIRCUIT COURT CASE NUMBER: ORDER ENTERED ON:	
15.			


 Signature of Inspector(s)

Informational Notes

1. [Illinois] Environmental Protection Act: 415 ILCS 5/4.
2. Illinois Pollution Control Board: 35 Ill. Adm. Code, Subtitle G.
3. Statutory and regulatory references herein are provided for convenience only and should not be construed as legal conclusions of the Agency or as limiting the Agency's statutory or regulatory powers. Requirements of some statutes and regulations cited are in summary format. Full text of requirements can be found in references listed in 1. and 2. above.
4. The provisions of subsection (p) of Section 21 of the [Illinois] Environmental Protection Act shall be enforceable either by administrative citation under Section 31.1 of the Act or by complaint under Section 31 of the Act.
5. This inspection was conducted in accordance with Sections 4(c) and 4(d) of the [Illinois] Environmental Protection Act: 415 ILCS 5/4(c) and (d).
6. Items marked with an "NE" were not evaluated at the time of this inspection.
7. Statutory effective date: through 7/9/99.
8. Regulatory effective date: through 5/20/99.

1894925001 -- Washington County
Prior Oil Company
Date of Inspection: August 30, 2001
Prepared by: Chris Cahnovsky

NARRATIVE

On August 30, 2001, Connie Letsky and I conducted a follow-up inspection at Prior Oil Company in Wamac, Illinois. No one was present during this inspection. The weather was hot, the temperature was about 85 degrees and soil conditions were dry. We arrived at the site about 11:00 a.m.

A fence has been put up limiting access to the site from Mitchell Lane. We entered the site from the adjacent property. I observed that the pile of crude oil contaminated soil removed from a dump pit was still on-site. This soil is from the remediation of a pit that contained crude oil behind Prior Oil Company's shed. This soil was removed and placed in a roll-off box. The soil was then again dumped on the ground. A Violation Notice was sent to Mr. John Prior for the dumping of crude oil in the pit. Prior Oil Company submitted a Compliance Commitment Agreement on December 12, 2000. The CCA stated that the soil would be disposed of at a landfill. To date the soil has not been disposed of at a permitted landfill. The Illinois EPA rejected the CCA on December 26, 2000 because the violations remain the subject of disagreement between the Illinois EPA and Prior Oil Company. The Illinois EPA sent a Notice of Intent to Pursue Legal Action letter to Mr. Prior on May 22, 2001. Mr. Prior did not respond to this letter.

The Illinois EPA responded to a citizen complaint at Prior Oil Company on December 5, 2000. The complainant alleged that oil field waste was being dumped in a hole behind the old incinerator behind Prior's shop. The Illinois EPA discovered that about three barrels, 126 gallons, of crude oil had been dumped in the vegetation behind the old incinerator. An Administrative Citation was issued for this dump on December 29, 2000. Mr. Prior has not responded to the Administrative Citation.

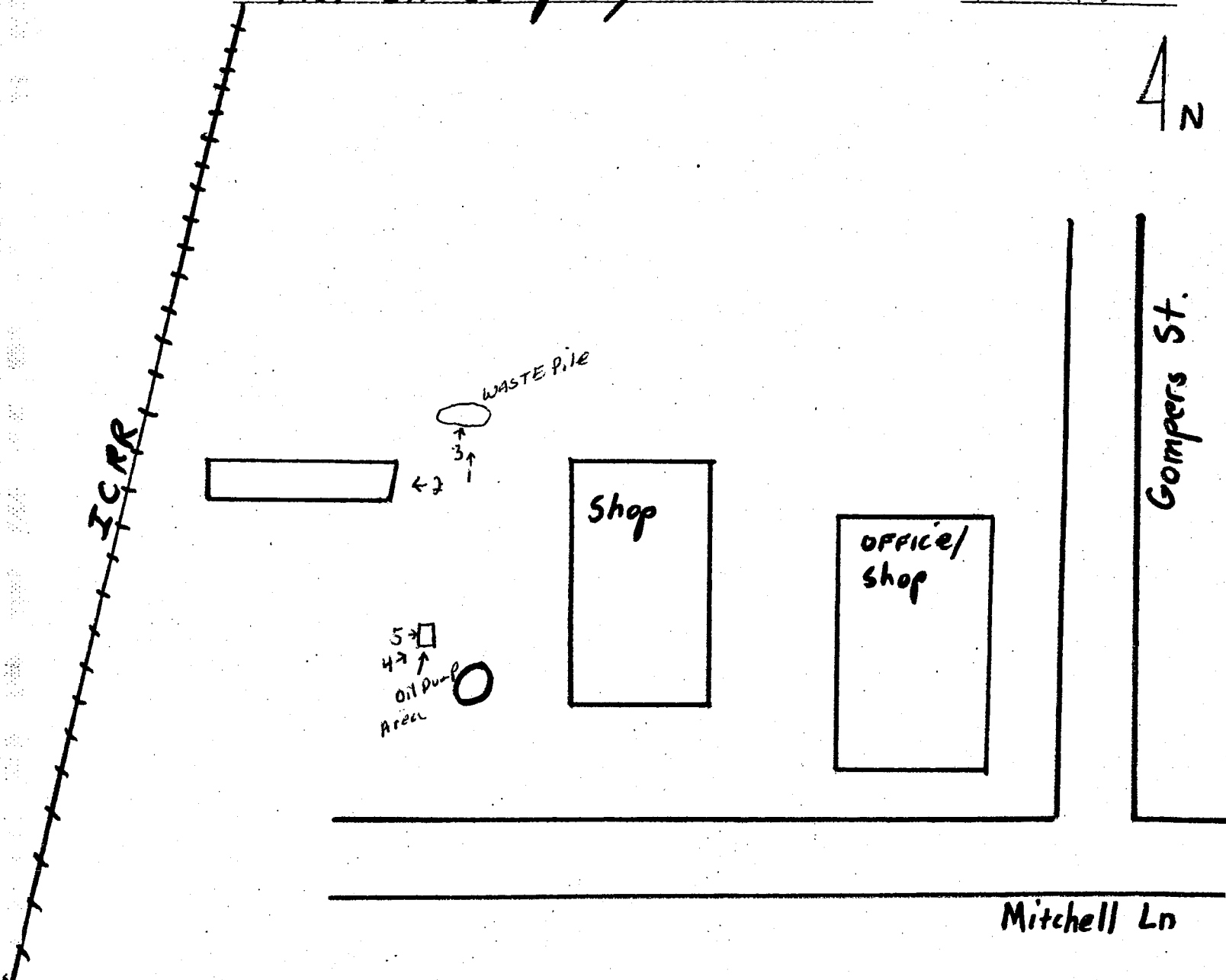
I reinspected this area during the August 20, 2001 inspection. The area appeared undisturbed. It did not appear that any soil excavation had taken place. I did not observe any black oil staining. It is possible that over time the crude oil had washed off the vegetation and into the soil.

I observed that a new pit had been dug behind the shop. No waste was observed in this pit. Access to the pit was blocked by a rack of steel pipes. It appears that this site has remained unchanged since the December 5, 2000.

STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY

SITE SKETCH

Date of Inspection: August 30, 2001 Inspector: Chris Cahovsky
Site Code: 1894925001 County: Washington
Site Name: Prier Oil Company Time: 11:00 - 11:20



LPC # 1894925001 – Washington County
Prior Oil Company
FOS File

DIGITAL PHOTOGRAPH PHOTOCOPIES

DATE: August 30, 2001
TIME: 11:00 – 11:20
DIRECTION: North
PHOTO by: Chris Cahnovsky
PHOTO FILE NAME:
1894925001-08082001-001



DATE: August 30, 2001
TIME: 11:00 – 11:20
DIRECTION: West
PHOTO by: Chris Cahnovsky
PHOTO FILE NAME:
1894925001-08082001-002



LPC # 1894925001 – Washington County
Prior Oil Company
FOS File

DIGITAL PHOTOGRAPH PHOTOCOPIES

DATE: August 30, 2001
TIME: 11:00 – 11:20
DIRECTION: North
PHOTO by: Chris Cahnovsky
PHOTO FILE NAME:
1894925001-08082001-003



DATE: August 30, 2001
TIME: 11:00 – 11:20
DIRECTION: Northeast
PHOTO by: Chris Cahnovsky
PHOTO FILE NAME:
1894925001-08082001-004



LPC # 1894925001 – Washington County
Prior Oil Company
FOS File

DIGITAL PHOTOGRAPH PHOTOCOPIES

DATE: August 30, 2001
TIME: 11:00 – 11:20
DIRECTION: East
PHOTO by: Chris Cahnovsky
PHOTO FILE NAME:
1894925001-08082001-005

