

**BEFORE THE ILLINOIS POLLUTION CONTROL BOARD**

RELIABLE STORES, INC., )  
 )  
 Petitioner, )  
 )  
 v. ) PCB 19-2  
 ) (UST Appeal)  
 OFFICE OF THE STATE FIRE MARSHAL, )  
 )  
 Respondent. )

**NOTICE OF ELECTRONIC FILING**

To: Patrick D. Shaw Carol Webb  
Law Office of Patrick D. Shaw Hearing Officer  
80 Bellerive Road Illinois Pollution Control Board  
Springfield, Illinois 62704 1021 North Grand Avenue East  
Pdshaw1law@gmail.com P.O. Box 19274  
Springfield, Illinois 62794-9274  
Carol.Webb@Illinois.gov

Don Brown  
Clerk  
Illinois Pollution Control Board  
James R. Thompson Center, Suite 11-500  
100 W. Randolph Street  
Chicago, Illinois 60601  
Don.Brown@illinois.gov

PLEASE TAKE NOTICE that on the 21st day of September, 2018, I caused to be filed with the Clerk of the Illinois Pollution Control Board the Record on Appeal (R1-90) and Certificate of Record on Appeal, including Index of Record on Appeal Pursuant to 35 Ill. Adm. Code 105.116 and 105.212, on behalf of the Respondent, Office of the State Fire Marshal, true and correct copies of which are attached hereto and hereby served upon you.

OFFICE OF THE STATE FIRE MARSHAL

By: /s/ Daniel Robertson  
Daniel Robertson  
Assistant Attorney General  
Environmental Bureau  
69 W. Washington St., 18<sup>th</sup> Floor  
Chicago, IL 60602  
(312) 814-3532  
drobertson@atg.state.il.us

**BEFORE THE ILLINOIS POLLUTION CONTROL BOARD**

RELIABLE STORES, INC.,	)	
	)	
<i>Petitioner,</i>	)	
	)	
v.	)	PCB 19-02
	)	(UST Appeal)
OFFICE OF THE STATE FIRE MARSHAL,	)	
	)	
Respondent.	)	

**CERTIFICATE OF RECORD ON APPEAL**

The undersigned Custodian of the records of the Illinois Office of the State Fire Marshal, Division of Petroleum and Chemical Safety, hereby certifies that the attached public records are true and complete copies of the official records of the Office of the State Fire Marshal, Division of Petroleum and Chemical Safety, and consist of the complete OSFM record concerning the OSFM's June 12, 2018 Reimbursement Eligibility and Deductible Application decision concerning the application of Reliable Stores, Inc. in IEMA incident No. 20180158, which occurred at the Roosevelt 66, 905 W. Roosevelt Road, Maywood, Illinois 60153 (OSFM Facility No. 2025658), consisting of official agency records from the records on file with the Office of the State Fire Marshal, Division of Petroleum and Chemical Safety, generated and maintained in the OSFM's file in the ordinary course of OSFM's regular practices and in the ordinary course of official agency business. The attached records consist of 90 pages, not counting this certification page, record index and log of privileged documents.

Dated: 9/17/18

  
 Shelly Bradley  
 Assistant Division Manager  
 Division of Petroleum and Chemical Safety  
 Illinois Office of the State Fire Marshal  
 1035 Stevenson Drive  
 Springfield, IL 62703  
 (217) 785-7812

Seal

**BEFORE THE ILLINOIS POLLUTION CONTROL BOARD**

RELIABLE STORES, INC.,	)	
	)	
<i>Petitioner,</i>	)	
	)	
v.	)	PCB 19-02
	)	(UST Appeal)
OFFICE OF THE STATE FIRE MARSHAL,	)	
	)	
Respondent.	)	

**INDEX OF RECORD ON APPEAL**

<u>Page</u>	<u>Description</u>
R1-R2	OSFM Eligibility and Deductible Application Decision
R3-R5	Emergency Response Investigation Report, dated February 14, 2018
R6-R8	Notice of Violation, dated February 20, 2018
R9	Notice of Violation Extension Letter, dated March 30, 2018
R10-R12	E-mail dated March 30, 2018, with attached copy of signed quote and deposit for work to retrofit sump entry boots
R13-R14	Notice of Violation Progress Report, dated May 9, 2018
R15-R22	PCB decision in case of Harlem Township v. IEPA, PCB 92-83, dated October 16, 1992
R23-R24	Copy of 415 ILCS 5/57.9
R25-R84	Eligibility and Deductible Application from Reliable Stores, Inc. with attachments, received on May 9, 2018
R85-R90	Amended Petition for Review of OSFM Determination with Notice of Filing, received by OSFM on August 28, 2018

**BEFORE THE ILLINOIS POLLUTION CONTROL BOARD**

RELIABLE STORES, INC.,	)	
	)	
Petitioner,	)	
	)	
v.	)	PCB 19-02
	)	(UST Appeal)
OFFICE OF THE STATE FIRE MARSHAL,	)	
	)	
Respondent.	)	

**PRIVILEGE LOG OF DOCUMENTS WITHELD FROM RECORD**

DATE	TYPE	SUBJECT	AUTHOR	RECIPIENT(S)	BASIS
6-11-18	E-mail	Reliable Stores' Eligibility and Deductible application	Tom Andryk, Legal	Deanne Locke, Division of Petroleum and Chemical Safety (DPCS); Scott Johnson, DPCS; Fred Schneller, DPCS	Attorney-Client Privilege
5-29-18	E-mail	Reliable Stores' Eligibility and Deductible application	Deanne Locke, Division of Petroleum and Chemical Safety (DPCS)	Tom Andryk, Legal; Scott Johnson, DPCS; Fred Schneller, DPCS	Attorney-Client Privilege
5-16-18	E-mail	Reliable Stores' Eligibility and Deductible application	Deanne Locke, Division of Petroleum and Chemical Safety (DPCS)	Tom Andryk, Legal; Shelly Bradley, DPCS; Scott Johnson, DPCS; Fred Schneller, DPCS	Attorney-Client Privilege
5-11-18	E-mail	Reliable Stores' Eligibility and Deductible application	Deanne Locke, Division of Petroleum and Chemical Safety (DPCS)	Tom Andryk, Legal; Shelly Bradley, DPCS; Scott Johnson, DPCS; Fred Schneller, DPCS	Attorney-Client Privilege

RI



**Office of the Illinois  
State Fire Marshal**

6/12/2018

Reliable Stores, Inc  
C/O Varghese Vallikalam  
905 West Roosevelt Road  
Maywood, IL 60153

In Re: Facility No. 2025658  
IEMA Incident No. 20180158  
Roosevelt 66  
905 W. Roosevelt  
Maywood, Cook, IL 60153

Dear Applicant:

The Reimbursement Eligibility and Deductible Application received on May 09, 2018 for the above referenced occurrence has been reviewed. The following determinations have been made based upon this review.

It has been determined that you are ineligible to seek payment of costs of corrective action or indemnification associated with the following tanks:

Tank 6 12000 gallon Gasoline  
Tank 7 8000 gallon Gasoline

An owner or operator is eligible to access the Underground Storage Tank Fund if the eligibility requirements are satisfied:

1. Neither the owner nor the operator is the United States Government,
2. The tank does not contain fuel which is exempt from the Motor Fuel Tax Law,
3. The costs were incurred as a result of a confirmed release of any of the following substances:
  - "Fuel", as defined in Section 1.19 of the Motor Fuel Tax Law
  - Aviation fuel
  - Heating oil
  - Kerosene
  - Used oil, which has been refined from crude oil used in a motor vehicle, as defined in Section 1.3 of the Motor Fuel Tax Law.
4. The owner or operator registered the tank and paid all fees in accordance with the statutory and regulatory requirements of the Gasoline Storage Act.
5. The owner or operator notified the Illinois Emergency Management Agency of a confirmed release, the costs were incurred after the notification and the costs were a result of a release of a substance listed in this Section. Costs of corrective action or indemnification incurred before providing that notification shall not be eligible for payment.
6. The costs have not already been paid to the owner or operator under a private insurance policy, other written agreement, or court order.
7. The costs were associated with "corrective action".

You are ineligible for reimbursement from the fund for the following reason(s):

Tank 6 12000 gallon Gasoline - Non UST related release - (415 ILCS 5/57.9) .

Tank 7 8000 gallon Gasoline - Non UST related release - (415 ILCS 5/57.9) .

This constitutes the final decision as it relates to your eligibility and the set deductible. We reserve the right to change the deductible determination should additional information that would change the determination become available. An underground storage tank owner or operator may appeal the decision to the Illinois Pollution Control Board (Board), pursuant to Section 57.9 (c) (2). An owner or operator who seeks to appeal the decision shall file a petition for a hearing before the Board within 35 days of the date of issuance of the final decision, (35 Illinois Administrative Code 105.504(b)).

For information regarding the filing of an appeal, please contact:

Clerk  
Illinois Pollution Control Board  
State of Illinois Center  
100 West Randolph, Suite 11-500  
Chicago, Illinois 60601  
(312) 814-3620

The following tanks are also listed for this site:

Tank 1 4000 gallon Gasoline  
Tank 2 8000 gallon Gasoline  
Tank 3 10000 gallon Gasoline  
Tank 4 550 gallon Used Oil  
Tank 5 500 gallon Heating Oil

Your application indicates that there has not been a release from these tanks under this incident number. You may be eligible to seek payment of corrective action costs associated with these tanks if it is determined that there has been a release from one or more of these tanks. Once it is determined that there has been a release from one or more of these tanks you may submit a separate application for an eligibility determination to seek corrective action costs associated with this/these tanks.

If you have any questions, please contact our Office at (217) 785-1020.

Sincerely,



Deanne Lock

Division of Petroleum and Chemical Safety



Office of the Illinois State Fire M...  
 Division of Petroleum and Chemic...  
 1035 Stevenson Drive  
 Springfield IL 62703

Facility #	2025658
Date	2/14/2018
IEMA #	

**EMERGENCY RESPONSE INVESTIGATION REPORT**

**OWNER OF TANKS**

**FACILITY**

Pothen Vallikalam  
 Name  
 5335 N. Meade Avenue  
 Street Address  
 Chicago IL 60630  
 City State Zip  
 Vallikalam 847-722-7598  
 Contact Person Phone

BP  
 Name  
 905 W. Roosevelt  
 Street Address  
 Maywood IL 60153 Cook  
 City State Zip County  
 Sunny Vallikalam 630-669-0338  
 Contact Person Phone

**TANK SYSTEM INFORMATION**

Tank	Capacity	Product	Status
6	12,000	Gasoline	Currently in use
7	8,000	Gasoline	Currently in use

1. Tank Number	<u>6</u>	<u>7</u>
2. Capacity	12,000	
3. Product Stored	<u>Gasoline</u>	<u>Gasoline</u>
<b>SECTION A. INCIDENT FINDINGS</b>		
1. Type of incident	<u>Leak</u>	<u>Leak</u>
2. Location of product/vapors	<u>Sewer</u>	<u>Sewer</u>
3. Does it appear that tank is involved	<u>No</u>	<u>No</u>
4. Does it appear tank leak detection is functioning	<u>Yes</u>	<u>Yes</u>
5. Does it appear that piping is involved	<u>Yes</u>	<u>Yes</u>
6. Does it appear that piping leak detection is functioning	<u>No</u>	<u>No</u>
7. Are all required records on site and current	<u>Yes</u>	<u>Yes</u>
8. Is leak associated with overfill only	<u>No</u>	<u>No</u>
9. Approximate gallons unaccounted for	UNKNOWN	UNKNOWN
10. Has a heavy rain recently occurred	<u>No</u>	<u>No</u>
<b>SECTION B. TANK STATUS</b>		
1. Going to be taken out of service	<input type="radio"/> Tank <input checked="" type="radio"/> Piping <input type="radio"/> Both	<input type="radio"/> Tank <input checked="" type="radio"/> Piping <input type="radio"/> Both
2. Is tank tightness test required	<u>Yes</u>	<u>Yes</u>
3. Is piping tightness test required	<u>Yes</u>	<u>Yes</u>

**OTHER AGENCY RESPONSE**

OSFM Support	<input type="checkbox"/> STSS Request	Name: <u>Randy Carben</u>	Phone: <u>217-725-4113</u>
Illinois EPA (ERU)	<input type="checkbox"/> STSS Request	Name: _____	Phone: _____
Fire Department	<input type="checkbox"/> STSS Request	Name: <u>Tony Parker</u>	Phone: <u>708-681-8861</u>
Law Enforcement	<input type="checkbox"/> STSS Request	Name: _____	Phone: _____
Public Works	<input type="checkbox"/> STSS Request	Name: _____	Phone: _____
Environmental Support	<input type="checkbox"/> STSS Request	Name: _____	Phone: _____
_____	<input type="checkbox"/> STSS Request	Name: _____	Phone: _____

**Remarks:**

Because of a complaint of gasoline odors in the restaurant next door ( JJ Fish - owned by Abdulla Alyafai 708-717-8211) the Maywood FD asked our office for help. I arrived on site at approximately 11:45am. I went to the restaurant just west of the property line and I witnessed gasoline floating on the water in the sump of the restaurant. I went back next door to ths station and began to investigate the Veeder Root, records and equipment. I found a leak under dispenser 1/2 and under dispenser 7/8. It appears both dispenser containments are leaking because the gasoline is flowing out the bottom of the dispenser pans. I shut down the fueling operation at both of these dispensers and ordered the dealer (Sunny Villikalam ) to hire a contractor to come and repair the leaks as I waited. I also ordered him to contact an environmental company to come and recover all the gasoline possible that had leaked out. B&K Equipment came out and repaired the dispenser leaks. Northbranch Environmental came out and removed the gasoline/water from under all dispensers, sumps, observation well, sewers and the sump pit next door at JJ Fish. Also a dish detergent was added to the sump pit next door at the restaurant to aid in cleaning up the gasoline odor and staining. I left the site at 16:30 hours , to return tomorrow 2-15-18.

Back on site 2-15-18 @ 08:15 hours. All repairs seem to be holding as I can't see anymore leaks. I checked the sewers and notice a rainbow sheen on the water and an odor of gasoline. I checked the sump next door at JJ Fish and it appears to have gasoline floating on the water but it is much better than yesterday.

Back on site 2-16-18 @ 08:45 to meet up with the IEPA and the owners environmental consultant. On site for the investigative meetings :

- 1.) Chuck Curtis IEPA
- 2.) Mark Ratcliff IEPA
- 3.) Brian Morin GRAND SLAM ENVIRONMENTAL
- 4.) David Yacko SITE ENVIRONMENTAL
- 5.) Tony Parker MAYWOOD FD
- 6.) Steven Spiewak MWRD

After inspecting JJFish sump pit there is still gasoline coming into the sump well. We inspected the local storm drains out in the roadway and parking lots. To the east they appear clean, in the parking lot between the gasoline station and JJFISH there is a rainbow on top of the water. We discussed the importance of installing extraction wells or an extraction trench between the properties. Tanknology was on site to tightness test the piping and they will return tomorrow to test the tanks. The owner Sunny Vallikalam was instructed on the importance to start remediation as soon as possible by the IEPA representatives.

The dispensing containment on pump 1/2 was found to have 3 empty pipe chase portholes that were open to the soils below . These portholes are 3" in diameter and allowed the leaking gasoline on pump 1/2 to escape before any sensor could alarm.

2-20-18

I checked the dispensers for leaks and all 4 appear to be alright. There is water in the bottom of all the dispenser pans and the owner stated he will have these repaired. I checked next door at JJ Fish and they still have petroleum in the sump. The sample I took today appeared nearly as bad as the first day I was here on the response. The top 2" of the sump appears to be petroleum.

3-22-18

On site today to witness Northbranch Environmental on site with a vac truck to remove water/product from separation trench. No free product was in any wells and there were no vapor readings with my explosion meter on any of the wells including the interceptor trench.

---

4/5/2018

X Randal Carben

Signed by: RANDAL L CARBEN  
Storage Tank Safety Specialist (Signature)

NOTE: Narrative using timeline of events in Remarks



Office of the Illinois State Fire Marshal  
 Division of Petroleum and Chemical Safety  
 1035 Stevenson Drive  
 Springfield IL 62703

Facility #	2025658	
Date	2/20/2018	
Notification Form Received	Y	N
	<input type="radio"/>	<input checked="" type="radio"/>

**NOTICE OF VIOLATION (UST)**

Facility Status: Active

**OWNER OF TANKS**

Pothen Vallikalam  
 Name  
 5335 N. Meade Avenue  
 Street Address  
 Chicago IL 60630  
 City State Zip  
 Vallikalam 847-722-7598  
 Contact Person Phone

**FACILITY**

BP  
 Name  
 905 W. Roosevelt  
 Street Address  
 Maywood IL 60153 Cook  
 City State Zip County  
 Sunny Vallikalam 630-669-0338  
 Contact Person Phone

Violations of 41 Ill. Adm Code 174, 175, 176 and 177 of the Office of the Illinois State Fire Marshal and 40 CFR Parts 280 of the Federal Register requirements are hereby called to your attention. The violations found and corrections to be made have been identified below or stated in the remarks section. Any repairs, modifications or alterations to the tank system must be performed in compliance with OSFM rules and by a contractor licensed by this office. You are allowed a 60-day window to come into compliance effective from the date of this notice. If compliance is not made by **4/21/2018**, your underground storage tanks system will be **RED TAGGED**. You are prohibited from having product placed into the UST system when a **RED TAG** exists. Contact the Storage Tank Safety Specialist below when said violations are corrected and if you have any questions.

**RED TAGS WILL NOT BE REMOVED UNTIL ALL DEFICIENCIES HAVE BEEN CORRECTED.**

TANK SYSTEM INFORMATION			
Tank	Capacity	Product	Status
6	12,000	Gasoline	Currently in use
7	8,000	Gasoline	Currently in use

**SECTION A. TANK RELEASE DETECTION**

Tank ID#

**Violation Text:**

Precision tank test required.

**Remarks:**

DUE TO RELEASE

Tank ID#

**Violation Text:**

Tank monitor does not appear to function properly and requires maintenance.

**Remarks:**

HAVE TESTED DUE TO RELEASE

**SECTION B. PIPING RELEASE DETECTION**

Tank ID#

**Violation Text:**

Precision line test required.

**Remarks:**

DUE TO RELEASE

<b>SECTION C.</b>	<b>SPILL PREVENTION</b>
<b>SECTION D.</b>	<b>OVERFILL PREVENTION</b>
<b>SECTION E.</b>	<b>TANK CORROSION PROTECTION</b>
<b>SECTION F.</b>	<b>PIPING CORROSION PROTECTION</b>

Tank ID# 

6	7
---	---

**Violation Text:**

Water in dispenser containment with interstitial sensors - Remove water and repair containments to prevent water ingress

**Remarks:**

ALL 4 CONTAINMENTS

Tank ID# 

6	7
---	---

**Violation Text:**

Water in submersible containment with required interstitial sensors - Remove water and repair containments to prevent water ingress.

**Remarks:**

BOTH CONTAINMENTS

<b>SECTION G.</b>	<b>DISPENSERS AND HOSES</b>
-------------------	-----------------------------

<b>SECTION H.</b>	<b>MISCELLANEOUS</b>
-------------------	----------------------

**Facility Violation Text:**

Perform Site Assessment

**Remarks:**

**Remarks:**

THE LEAKS I FOUND UNDER DISPENSERS 1/2 AND 7/8 WERE REPAIRED BY B&K EQUIPMENT ON 2-14-18 WHILE I WITNESSED REPAIRS. NORTHBRANCH ENVIRONMENTAL REMOVED ALL THE PRODUCT FROM THE DISPENSER PANS, OBSERVATION WELL, SEWERS AND THE SUMP PIT NEXT DOOR AT JJ FISH.

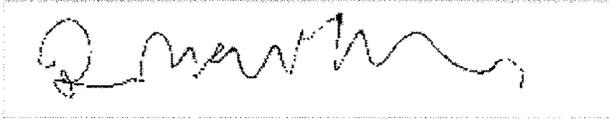
*(Note: If any equipment fails or is identified as deficient during testing, it must be repaired or replaced to comply with this violation.)*

Signature unobtainable

Signature refused

2/20/2018

X Randal Carben



Signed by: RANDAL L CARBEN

**Signed by RANDAL L CARBEN** [View details](#)

on Tuesday, February 20, 2018 9:42 AM (Central Standard Time)

Storage Tank Safety Specialist (Signature)

Phone: 217-725-4113

Sunny Vallikalam	Dealer
Exit interview given to	Title



Office of the Illinois  
**State Fire Marshal**

"Partnering With the Fire Service to Protect Illinois"

CERTIFIED MAIL - RECEIPT REQUESTED #

NOTICE OF VIOLATION - EXTENSION

March 30, 2018

Pothen Vallikalam  
5335 N. Meade Avenue  
Chicago, IL 60630

In Re: NOV No.E0020180486  
Facility No. 2-025658  
Roosevelt 66  
905 W. Roosevelt  
Maywood, Cook Co., IL

To Whom It May Concern:

On 02/20/2018, a representative of the Division of Petroleum and Chemical Safety conducted an on-site inspection of the above referenced facility and issued a Notice of Violation (NOV). The purpose of the inspection was to determine compliance with all Illinois Administrative Code 174, 175, 176 and 177 regulations and 40 CFR Parts 280 and 281 Federal Register requirements.

Our office has received a request for an extension of the above referenced Notice of Violation. You are being given a onetime extension to come into compliance. **If compliance is not made by May 21, 2018, your underground storage tank system will be RED TAGGED. You are prohibited from having product placed into the UST system when a RED TAG exists. This case will then be forwarded to the Illinois Attorney General's Office for prosecution with the possibility of fines and/or removal of the UST system.**

Your cooperation in this matter is greatly appreciated. Contact Randy Carben at 217-725-4113, if you have any questions or when said violations are corrected.

Sincerely,

A handwritten signature in black ink, appearing to read "Fred M. Schneller".

Fred M. Schneller  
Division Manager  
Division of Petroleum and Chemical Safety

cc: Facility File  
STSS

Schneller, Fred

2025658

**From:** Schneller, Fred  
**Sent:** Friday, March 30, 2018 4:26 PM  
**To:** 'Ed Angell'  
**Cc:** Johnson, Scott; m.hughes@grahamcstores.com; Sunny Vallikalam; Carben, Randy  
**Subject:** RE: 905 W. Roosevelt Rd, Maywood, Facility 2025658, request for NOV extension  
**Attachments:** 2025658\_NovExtensionLetter\_BandK.PDF

Ed:

Attached find an NOV Extension Letter dated to 5/21/18.

Fred M. Schneller, Division Manager  
Office of the Illinois State Fire Marshal  
Petroleum & Chemical Safety  
1035 Stevenson Dr.  
Springfield, Illinois 62703  
[fred.schneller@illinois.gov](mailto:fred.schneller@illinois.gov)  
(217) 557-3131 office  
(217) 836-6316 mobile

**From:** Ed Angell [mailto:ed@bkequip.com]  
**Sent:** Thursday, March 29, 2018 2:28 PM  
**To:** Schneller, Fred <Fred.Schneller@Illinois.gov>  
**Cc:** Johnson, Scott <Scott.Johnson@Illinois.gov>; m.hughes@grahamcstores.com; Sunny Vallikalam <svallikalam@gmail.com>  
**Subject:** [External] 905 W. Roosevelt Rd, Maywood, Facility 2025658, request for NOV extension

Attached is a copy of a signed quote and cashier's check as deposit for a job to retrofit all of the sump entry boots at this location. The site has a Notice of Violation against it that expires on 4/21/18. I just received this information today and I am requesting an extension of the expiration date of the NOV for the site. I am ordering the retrofit boot kits today but it may take up to three weeks to secure the delivery of the material for the job. The job duration should be about a week. I would appreciate if the expiration of the NOV could be extended until the second week of May, 2018, to allow me to take delivery, schedule and complete the job.

I have copied the site owner and his fuel supplier representative on this email.

Thank you,  
Ed Angell  
Project Coordinator  
Office: 708.474.3344  
Fax: 708-474-3356





PETROLEUM INDUSTRY SALES, SERVICE, INSTALLATION  
2939 175th Street Lansing, Illinois 60438  
Phone: 708-474-3344 Fax: 708-474-3356

DATE: 3/2/2018

PROPOSAL

QUOTE #  
0000358177

CUST #  
0001467  
00001

To: MAYWOOD BP  
905 W ROOSEVELT ROAD  
MAYWOOD IL 60153

Site: MAYWOOD BP  
905 W ROOSEVELT ROAD  
MAYWOOD IL 60153

QTY.

PRODUCT DESCRIPTION

Sunny, 847-722-7598, svallikalam@gmail.com

We propose to furnish material and labor to rebuild all pipe and conduit sump entry boots as follows.

BASE BID	
4.00	Remove and store on site the existing dispensers.
12.00	Remove and junk the existing dispenser sump pipe entry boots.
12.00	Furnish and install retrofit, split boot pipe repair kits.
12.00	Remove and junk the existing dispenser sump conduit entry boots.
12.00	Furnish and install retrofit, split boot conduit repair kits.
4.00	Reinstall the existing dispensers.
2.00	Remove and junk the existing pump sump pipe entry boots.
6.00	Furnish and install retrofit, split boot conduit entry boots.
	BASE BID TOTAL        \$28,000.00

NOTES

This quote does not contain provisions for any ground water removal or any costs related to local permitting.  
The dispensers sump boot repairs will be completed one dispenser at a time and a minimum of two dispensers will be open at all times while the dispenser work is being completed.  
During the pump sump boot repairs each product pump will be shut down for half of one day each.  
Material delivery is currently secured within ten days.  
Job duration should be nine working days.  
Due to the current work load, this job cannot begin until April 30, 2018.  
The site owner should seek an extension of the existing Fire Marshal Violation Notice.  
B&K Equipment is not certified on the type of flexible piping at this location and there may be other alternatives to repair the boots rather than a full replacement as quoted above. It is suggested that you find the original installing contractor or a contractor certified in flexible pipe installations for possible solutions to the leaking entry boots at this location.

TERMS

Upon acceptance of this quote a deposit of \$10,000.00 is due. On the first day of the work an additional \$15,000.00 is due. The remainder of the quote amount, as well as any out-of-quote-work completed is due immediately upon completion of the work. Credit card payments are subject to a 3% surcharge.

PREPARED BY: ED ANGELL

ACCEPTED:

DATE: 3-21-18

THIS PROPOSAL IS GOOD FOR 60 DAYS

I have examined this proposal and agree to the items or specifications above along with the terms and conditions as detailed on the reverse.

NOV EXPIRES 4/21

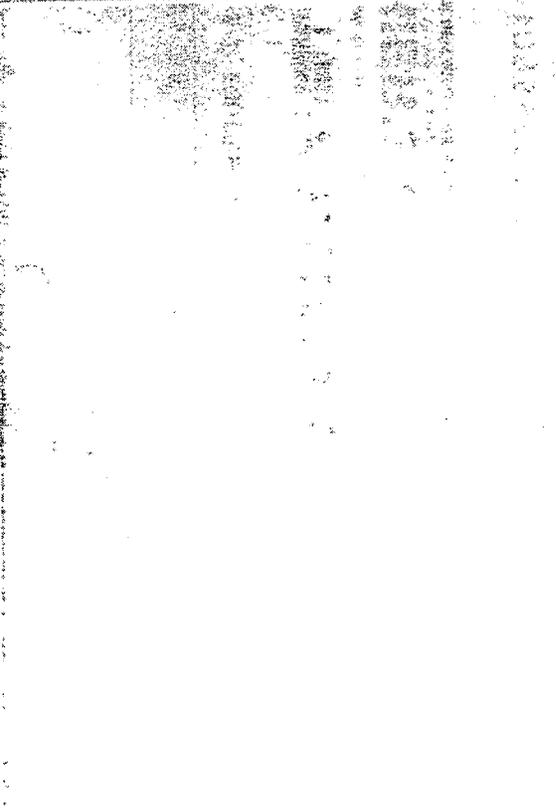
Electronic Filing: Received, Clerk's Office 09/21/2018

R12

ENDORSE HERE

PAY TO THE ORDER OF  
GREAT LAKES BANK  
P.O. BOX 329- BLUE ISLAND, IL 60406  
-071911789  
FOR DEPOSIT ONLY  
B&K EQUIPMENT CO.  
0306061516

DO NOT WRITE, STAMP OR SIGN BELOW THIS LINE  
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FR-45

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Prismatic Background	• Multi-colored background appears distorted when photocopied
Authentic Watermark	• Authentic watermark not visible when held to light
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Issued by 13-1315  
 REMITTER  
 RELIABLE STORES INC.

PAY TO THE ORDER OF  
 B & K EQUIPMENT

ORIGINAL PAYMENT INSTRUMENT

PARKWAY BANK & TRUST CO  
 4900 N. Harlem Ave., Harwood Heights, IL 60706  
 Member FDIC

DATE March 28, 2018

10955995

70-818719

PARKWAY BANK & TRUST CO  
 \$ 10,000.00 DOLLARS

CASHIER'S CHECK

10955995 10719081601 39 001 1

Barcode

10955995



Office of the Illinois State Fire Marshal  
 Division of Petroleum and Chemical Safety  
 1035 Stevenson Drive  
 Springfield IL 62703

Facility #:	2025658
NOV #:	E0020180486
NOV Date:	2/20/2018
Date:	5/9/2018

**NOTICE OF VIOLATION - PROGRESS REPORT**

Facility Status: Active

**OWNER OF TANKS**

**FACILITY**

Pothen Vallikalam  
 Name  
 5335 N. Meade Avenue  
 Street Address  
 Chicago IL 60630  
 City State Zip  
 Vallikalam 847-722-7598  
 Contact Person Phone

Roosevelt 66  
 Name  
 905 W. Roosevelt  
 Street Address  
 Maywood IL 60153 Cook  
 City State Zip County  
 Sunny Vallikalam 630-669-0338  
 Contact Person Phone

**VIOLATIONS**

Tanks: 6, 7 Status: Complied

**Violation:**  
 Water in submersible containment with required interstitial sensors - Remove water and repair containments to prevent water ingress.  
**Remarks:**  
 All repairs and tested are completed

Tanks: 6, 7 Status: Complied

**Violation:**  
 Precision tank test required.  
**Remarks:**  
 All repairs and tested are completed

Tanks: 6, 7 Status: Complied

**Violation:**  
 Tank monitor does not appear to function properly and requires maintenance.  
**Remarks:**  
 All repairs and tested are completed

Tanks: N/A Status: Complied

**Violation:**  
 Perform Site Assessment  
**Remarks:**  
 All repairs and tested are completed

Tanks: 6, 7 Status: Complied

**Violation:**  
 Precision line test required.  
**Remarks:**

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All repairs and tested are completed

**Tanks:** 6, 7 **Status:** Complied

**Violation:**

Water in dispenser containment with interstitial sensors - Remove water and repair containments to prevent water ingress

**Remarks:**

All repairs and tested are completed

**Remarks:**

Signature unobtainable

Signature refused

5/9/2018



X Randy Carben

Signed by: RANDAL L CARBEN  
Storage Tank Safety Specialist (Signature)

Sunny \_\_\_\_\_ Owner  
Exit interview given to \_\_\_\_\_ Title

Phone: 217-725-4113

ILLINOIS POLLUTION CONTROL BOARD  
October 16, 1992

HARLEM TOWNSHIP,	)	
	)	
Petitioner,	)	
	)	PCB 92-83
v.	)	(Underground Storage Tank Fund
	)	Reimbursement Determination)
ILLINOIS ENVIRONMENTAL	)	
PROTECTION AGENCY,	)	
	)	
Respondent.	)	

NANCY MINDRUP APPEARED ON BEHALF OF THE PETITIONER, HARLEM TOWNSHIP;

DANIEL MERRIMAN APPEARED ON BEHALF OF THE RESPONDENT, ILLINOIS ENVIRONMENTAL PROTECTION AGENCY.

OPINION AND ORDER OF THE BOARD (by B. Forcade):

This matter is before the Board on a "Petition for Review of Agency Decision" filed by Harlem Township on June 2, 1992, pursuant to Sections 22.18b(g) and 40 of the Illinois Environmental Protection Act (Act). (Ill. Rev. Stat 1991, ch. 111 1/2, par. 1022.18b(g) and 1022.40.) A release of petroleum occurred at a garage facility operated by Harlem Township, located in Winnebago County, Illinois. The petition seeks review of the Environmental Protection Agency's (Agency) determination that the release is ineligible for reimbursement because it is not associated with an UST (underground storage tank) system.

A hearing was held on August 18, 1992 in Machesney Park, Illinois. The parties did not file final briefs but relied on closing arguments at hearing.

On September 10, 1992, Ramada Hotel, O'Hare (Ramada) filed a "Motion for Leave to Submit an Amicus Curiae Brief". On September 28, 1992, Harlem Township filed a response in support of the amicus brief. Harlem Township in its response requests the Board to deem the amicus curiae brief submitted by Ramada to have been adopted by Harlem Township. The Agency filed its response on September 29, 1992, along with a motion to file the response instanter. The Board grants the above motions and accepts the above filings.

BACKGROUND

On April 22, 1991, Charles Brockman, an employee of the Harlem Township road commission, noticed signs that a release of petroleum from the fuel pump had occurred over the weekend. Upon arriving at work that morning he noticed that the gate was open, the shop door was unlocked and there was a puddle by the fuel

pumps. (Tr. at 7-9.) He also noticed one of the nozzles from the fuel pump in an unlocked position laying on the ground. (Tr. at 9.) No gasoline was being discharged from the nozzle at the time because the pump had burned out. (Tr. at 10-11.)

The area where the pump is located is gravel and grass with blacktop around it. (Tr. at 15.) A switch to activate the pump is located in the shop. (Tr. at 16.) A police report was filed on the incident. (Tr. at 20, R. at 49.) Vandalism is suspected but no arrest has been made. (Tr. at 21.) Harlem Township estimates that approximately 450 gallons of gasoline were released from the pump. (Tr. at 12.)

The pumps and tanks were subsequently pulled and the site remediated. (Tr. at 21.) Harlem Township filed an application with the Agency for reimbursement from the underground storage tank fund on February 28, 1992. (R. at 9.) The Agency denied reimbursement because the release is not a release from an underground storage tank system. (R. at 56, Tr. at 34.)

#### ISSUE

The facts are not disputed in this matter. The question before the Board is whether a release of gasoline from a pump nozzle is covered by the UST reimbursement fund.

Harlem Township argues that pumps or pump nozzles are not specifically excluded from the definition of underground storage tank. Harlem Township further argues that if the intent had been to exclude them they would have been listed as a specific exclusion. Additionally, Harlem Township argues that the definition of underground storage tank system at 35 Ill. Adm. Code 731.112 includes containment system and the pump and pump nozzle are part of the containment system. Harlem Township also references language from the Agency's guidance manual in support of its argument.<sup>1</sup>

The Agency asserts that references to the associated piping and ancillary equipment in the definition of underground storage tank includes the term 'underground'. The Agency argues that the customary and ordinary meaning should be applied to underground and therefore the pump and pump nozzle would not be part of the underground storage tank.

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<sup>1</sup> In Platolene 500 v. IEPA (May 7, 1992), PCB 92-9, the Board held that the guidance manual has no legal or regulatory effect in proceedings before the Board and that the Board is not bound by the guidance manual. Therefore, the Board will not consider the arguments that rely upon the guidance manual.

Harlem Township, in response to the Agency's argument, contends that underground is not used to describe containment system. It further argues that some of the listed exclusions of underground storage tank include equipment that is located above ground (surface impoundment, pit, pond or lagoon).

~~The amicus curiae brief contends that the Agency has changed its position, in that the Agency previously maintained that spillage during vehicle filling was a release from an UST in Sparkling Springs Mineral Water Co. v. IEPA (May 9, 1991), PCB 91-9. (Am. Br. at 3.) The brief further points out that the danger to human health and the threat to the environment are the same irrespective of whether the petroleum is released from the nozzle or leaks from the underground tank. (Am. Br. at 4.) The Amicus states that the Act is to be liberally construed and interpreting the statute to include releases from the pump nozzle is consistent with the express purpose of the Act. (Am. Br. at 5.) The brief further argues that the Agency's interpretation of the statute would remove contamination from spills though the nozzle from the corrective action requirements and various regulations in the UST statutes. (Am. Br. at 7.) The amicus further argues that the Agency's interpretation is contrary to USEPA's interpretation of the Federal UST Regulations and could jeopardize federal dollars. (Am. Br. at 8.)~~

The Agency in its response interprets the language in the statute and regulations defining UST and UST system to not include the pump nozzle and therefore concludes that a release of petroleum from the nozzle is not eligible for reimbursement from the fund. (Resp. at 10-11.) The Agency references the regulations of the Office of the State Fire Marshal (OSFM) regulating gasoline storage tanks. (Resp. at 11.) The Agency states that the OSFM regulations draw a clear distinction between USTs or UST systems and the dispensing unit. (Resp at 12.) The Agency notes that the issue in Sparkling Springs was the application of the deductible and that Ramada's reliance on Sparkling Springs is misplaced. (Resp. at 13-14.) The Agency contends that its interpretation is consistent with USEPA's interpretation. (Resp. at 15.) The Agency further notes a distinction between the UST fund reimbursement provisions, and the clean-up provisions of the Act. (Resp. at 15.) The Agency maintains that its interpretation is consistent with the specified intent of the Act and the UST reimbursement fund. (Resp. at 16.) The Agency also contends that a narrow construction will preserve taxpayer funds and ensure continued availability of reimbursement.<sup>2</sup>

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<sup>2</sup> The Board has previously found that the Agency does not have the authority to determine reimbursement based on the sufficiency of the fund. (See City of Roodhouse v. IEPA (September 17, 1992), PCB 92-31.)

0136-0391

DISCUSSION

Reimbursement from the fund is allowed for corrective action resulting from a release of petroleum from an underground storage tank. (Section 22.18b(a)(3) of the Act.) It is undisputed that there was a release of petroleum; however the question remains whether the release was from an underground storage tank.

Section 22.18(e)(1)(A) of the Act states that "underground storage tank" shall have the same meaning as in Subtitle I of the Hazardous Solid Waste Amendments of 1984 (P.L. 98-616), of the Resource Conservation and Recovery Act of 1976 (P.L. 94-580). Underground storage tank is defined in the Board's regulations in Section 731.112 as "one or a combination of tanks (including underground pipes connected thereto) which is used to contain an accumulation of regulated substances, and the volume of which (including the volume of underground pipes connected thereto) is ten per centum or more beneath the surface of the ground." The regulations then proceed to list several exclusions from the definition of underground storage tank.<sup>3</sup>

The pump and the pump nozzle are not an underground storage tank. The pump system is not a tank or part of the underground pipes connecting the tank. If the statute is read as limiting reimbursement to leaks from underground tanks and underground interconnecting piping only, the release from the pump nozzle would not be eligible for reimbursement from the fund because the pump is not part of the underground storage tank or underground piping.

While the Act references "release from an underground storage tank", the Agency denied eligibility on the basis that the release was not from an "UST system." The parties in their arguments do not make a distinction between the underground storage tank and an underground storage tank system and often discuss the two terms interchangeably. However, even if reimbursement was extended to include a release from an UST system, a release from the pump nozzle would be ineligible for reimbursement.

The Board's regulations define an "UST system" or "tank system" as "an underground storage tank, connected underground piping, underground ancillary equipment, and containment system, if any." (Section 731.112.) In addition to the UST tank (tank and underground piping) the UST system also includes underground ancillary equipment and any containment system.

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<sup>3</sup> The definition and exclusions found in the Board's regulations are identical to the federal definition of underground storage tank and exclusions found at 40 CFR 280.1.

0136-0392

Ancillary equipment is defined at Section 731.112 as "any device including but not limited to, such devices as piping, fittings, flanges, valves, and pumps used to distribute, meter or control the flow of regulated substances from an UST." The fuel pump and pump nozzle satisfy the definition of ancillary equipment. It is the function of the fuel pump to control and meter the flow of gasoline for distribution. The pump and pump nozzle are located above ground level and are not underground ancillary equipment included in the definition of UST system.

The Board's rules and regulations on USTs do not provide a definition of containment system<sup>4</sup>. Because containment system is not specifically defined it must be given its ordinary meaning. A containment system holds or retains a substance. The pump and pump nozzle do not constitute part of the containment system. While the pump and pump nozzle do contain product, the function of these parts is to regulate the flow of the product for distribution. It is not the function of the pump nozzle to contain the contents of the tank.

The Board also finds that for a containment system to be part of a UST system it must be at least partially located underground. To hold otherwise would be contrary to the prevailing emphasis on underground systems found in the regulations. To hold that an aboveground tank or piping system is part of a UST system on the basis that it is a containment system would place equipment that is located totally above ground into the UST system. Many of the definitions and provisions found in the regulations clearly exclude above ground items. The Board finds no reason why the limitation of underground would not apply to the containment system.

The release at issue was from the nozzle of a fuel pump located above groundlevel. The release of petroleum was from ancillary equipment located above ground. The regulation specifically includes only the ancillary equipment located underground as part of the UST system. Ancillary equipment that is not located underground is not part of the UST system. The release from the pump was not a release from an UST system. Therefore, even if reimbursement was allowed for a release from a UST system, a release from the pump nozzle would not be eligible for reimbursement.

The Board does not find Sparkling Springs to be controlling on determining the eligibility of a release of petroleum from a

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<sup>4</sup> The federal UST regulations provide the requirements for secondary containment systems in 40 CFR 280.42(b)(1).

pump nozzle.<sup>5</sup> In its original application Sparkling Springs noted that the tanks were removed because of leakage. In an amended application Sparkling Springs identified the release as a product overflow. At hearing testimony was presented that there was spillage and overflow from both the filling of the UST and filling the delivery trucks. The Board stated that "regardless of which version of events is applied its deductible remains the same." The eligibility determination in Sparkling Springs would not have been altered by a finding that a release from the pump nozzle were ineligible for reimbursement. The reported source of contamination also involved overfills on filling the UST tank. Any implication in Sparkling Springs that spills from the filling of vehicles were eligible for reimbursement was dicta and is not controlling. Based on the Board's review of the statute and regulations pertaining to USTs the Board finds such implication in error.

The Board is likewise not persuaded by the other arguments presented in the amicus curiae brief. The Board agrees that the effects on the environment and human health are the same whether the release is from a leak in the tank or from the nozzle. However, the Board notes that the Act allows for reimbursement for certain activities, not for all environmental consequences. Additionally the Board notes that the Act denies reimbursement from the fund in other cases where the same environmental effects are found (i.e., unregistered tanks, failure to notify ESDA and exempt fuels).

The Board does not find any authority to suggest that the Board's interpretation is contrary to the federal interpretation of the UST regulations. Nor does the Board believe that this interpretation is contrary to the intent of the statute or the intent of the UST fund.

Where the federal regulations discuss spills and overfills these incidents appear to be limited to the transfer of product to the UST system. (40 CFR 280.20(c).) The explanatory opinion accompanying the USEPA's adoption of the federal UST regulations in discussing spills and overfills notes that:

...there is an even more prevalent source of release that takes place at the tank fill port during filling. Although usually small in volume, spill and overflow releases are probably the most common causes of releases from UST systems.

\* \* \*

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<sup>5</sup> The issue before the Board in Sparkling Springs was the amount of the deductible. The source of contamination was not at issue.

0136-0394

Spills most often occur at the fill pipe opening when the delivery truck's hose is disconnected, usually releasing only a few gallons. . . . .Overfills generally result from a release from loose or nonoperational components located above the tanks. . . . , or from the tank's vent pipes as product is forced out during overfilling the system.

53 Fed. Reg. 185, 37090 (1988)

The regulations appear to extend the UST regulations to include the fill port and cover releases that occur while filling the UST. While the regulations expressed a concern for releases on filling the tank, the regulations do not expressly mention releases during the transfer of product from the UST. While the Board recognizes that releases frequently occur from the pump nozzle, the Board does not find an intent in the regulations for releases from the pump nozzle to be covered by the UST regulations.

In Illinois, the Office of the State Fire Marshal (OSFM) regulates gasoline storage tanks under the auspices of the Gasoline Storage Act (Ill. Rev. Stat. 1991, ch. 127 1/2, par. 152.1 - 159). The OSFM regulations on the "storage, transportation, sale and use of petroleum and other regulated substances" are found at 41 Ill. Adm. Code Part 170. Similar definitions and provisions are found in the OSFM's regulations, the Board's regulations and the federal regulations. The OSFM regulations contain provisions on the registration, installation, leak detection, leak reporting, repair, etc. The OSFM regulations also contain separate provisions on the dispensing of gasoline or other regulated substances from USTs. The OSFM regulations draws a distinction between UST systems and the dispensing system. While not controlling, the OSFM regulations buttress the Board's conclusion.

Dispensing systems are not regulated under the federal UST regulations or the Board's regulations. OSFM is authorized to regulate the storage of petroleum and provides separate provisions on UST systems and dispensing equipment. The fact that the federal and Board regulations do not mention dispensing systems or the transfer of petroleum from the UST system implies that this area was not intended to be covered by the UST regulations. The fact that the OSFM regulations cover dispensing equipment and USTs in separate provisions supports the conclusion that the pump nozzle is not part of the UST system.

#### CONCLUSION

To be eligible to access funds from the underground storage tank fund the release must be from an underground storage tank. The above ground dispensing pump and pump nozzle are not part of

0136-0395

R22

the underground storage tank. Therefore, a release of petroleum from the pump or the pump nozzle are not eligible for reimbursement.

This opinion constitutes the Board's finding of fact and conclusions of law in this matter.

ORDER

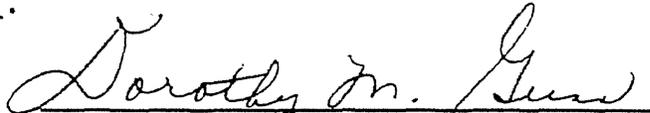
The Board affirms the Agency's determination that a release of petroleum from the pump nozzle is ineligible for reimbursement from the underground storage tank fund.

IT IS SO ORDERED.

Board Members J. Theodore Meyer and M. Nardulli dissented.

Section 41 of the Environmental Protection Act (Ill. Rev.Stat. 1991, ch. 111 1/2, par 1041) provides for appeal of final orders of the Board within 35 days. The Rules of the Supreme Court of Illinois establish filing requirements. (But see also 35 Ill. Adm. Code 101.246, Motions for Reconsideration, and Castenada v. Illinois Human Rights Commission (1989), 132 Ill. 2d 304, 547 N.E.2d 437.)

I, Dorothy M. Gunn, Clerk of the Illinois Pollution Control Board, hereby certify that the above opinion and order was adopted on the 16<sup>th</sup> day of October, 1992, by a vote of 5-2.

  
Dorothy M. Gunn, Clerk  
Illinois Pollution Control Board

(415 ILCS 5/57.9)

Sec. 57.9. Underground Storage Tank Fund; eligibility and deductibility.

(a) The Underground Storage Tank Fund shall be accessible by owners and operators who have a confirmed release from an underground storage tank or related tank system of a substance listed in this Section. The owner or operator is eligible to access the Underground Storage Tank Fund if the eligibility requirements of this Title are satisfied and:

(1) Neither the owner nor the operator is the United States Government.

(2) The tank does not contain fuel which is exempt from the Motor Fuel Tax Law.

(3) The costs were incurred as a result of a confirmed release of any of the following substances:

(A) "Fuel", as defined in Section 1.19 of the Motor Fuel Tax Law.

(B) Aviation fuel.

(C) Heating oil.

(D) Kerosene.

(E) Used oil which has been refined from crude oil used in a motor vehicle, as defined in Section 1.3 of the Motor Fuel Tax Law.

(4) The owner or operator registered the tank and paid all fees in accordance with the statutory and regulatory requirements of the Gasoline Storage Act.

(5) The owner or operator notified the Illinois Emergency Management Agency of a confirmed release, the costs were incurred after the notification and the costs were a result of a release of a substance listed in this Section. Costs of corrective action or indemnification incurred before providing that notification shall not be eligible for payment.

(6) The costs have not already been paid to the owner or operator under a private insurance policy, other written agreement, or court order.

(7) The costs were associated with "corrective action" of this Act.

If the underground storage tank which experienced a release of a substance listed in this Section was installed after July 28, 1989, the owner or operator is eligible to access the Underground Storage Tank Fund if it is demonstrated to the Office of the State Fire Marshal the tank was installed and operated in accordance with Office of the State Fire Marshal regulatory requirements. Office of the State Fire Marshal certification is prima facie evidence the tank was installed pursuant to the Office of the State Fire Marshal regulatory requirements.

(b) For releases reported prior to the effective date of this amendatory Act of the 96th General Assembly, an owner or operator may access the Underground Storage Tank Fund for costs associated with an Agency approved plan and the Agency shall approve the payment of costs associated with corrective action after the application of a \$10,000 deductible, except in the following situations:

(1) A deductible of \$100,000 shall apply when none of

the underground storage tanks were registered prior to July 28, 1989, except in the case of underground storage tanks used exclusively to store heating oil for consumptive use on the premises where stored and which serve other than farms or residential units, a deductible of \$100,000 shall apply when none of these tanks were registered prior to July 1, 1992.

(2) A deductible of \$50,000 shall apply if any of the underground storage tanks were registered prior to July 28, 1989, and the State received notice of the confirmed release prior to July 28, 1989.

(3) A deductible of \$15,000 shall apply when one or more, but not all, of the underground storage tanks were registered prior to July 28, 1989, and the State received notice of the confirmed release on or after July 28, 1989.

For releases reported on or after the effective date of this amendatory Act of the 96th General Assembly, an owner or operator may access the Underground Storage Tank Fund for costs associated with an Agency approved plan, and the Agency shall approve the payment of costs associated with corrective action after the application of a \$5,000 deductible.

A deductible shall apply annually for each site at which costs were incurred under a claim submitted pursuant to this Title, except that if corrective action in response to an occurrence takes place over a period of more than one year, in subsequent years, no deductible shall apply for costs incurred in response to such occurrence.

(c) Eligibility and deductibility determinations shall be made by the Office of the State Fire Marshal.

(1) When an owner or operator reports a confirmed release of a regulated substance, the Office of the State Fire Marshal shall provide the owner or operator with an "Eligibility and Deductibility Determination" form. The form shall either be provided on-site or within 15 days of the Office of the State Fire Marshal receipt of notice indicating a confirmed release. The form shall request sufficient information to enable the Office of the State Fire Marshal to make a final determination as to owner or operator eligibility to access the Underground Storage Tank Fund pursuant to this Title and the appropriate deductible. The form shall be promulgated as a rule or regulation pursuant to the Illinois Administrative Procedure Act by the Office of the State Fire Marshal. Until such form is promulgated, the Office of State Fire Marshal shall use a form which generally conforms with this Act.

(2) Within 60 days of receipt of the "Eligibility and Deductibility Determination" form, the Office of the State Fire Marshal shall issue one letter enunciating the final eligibility and deductibility determination, and such determination or failure to act within the time prescribed shall be a final decision appealable to the Illinois Pollution Control Board.

(Source: P.A. 96-908, eff. 6-8-10.)

**Applicant Information**

<b>Applicant Info</b> <b>Applicant Name</b> Reliable Stores, Inc <b>C/O</b> Varghese Vallikalam <b>Address</b> 905 West Roosevelt Road Maywood, IL 60153 <b>Email Address</b> svallikalam@gmail.com <b>Applicant Type(s)</b> Current Property Owner Current Tank Operator Current Tank Owner		<b>Contact Info</b> <b>Contact Name</b> Brian Morin <b>Company</b> Eagle Environmental Consultants, LLC <b>Phone Number</b> (630) 940-2540 <b>Email</b> brian.morin@eaglecllc.com	
<b>Owner - U0031306</b> <b>Owner Name</b> Pothan Vallikalam <b>Address</b> 5335 N. Meade Avenue Chicago, IL 60630 <b>Contact Person</b> Vallikalam <b>Phone Number</b> (847) 722-7598		<b>Facility - 2025658</b> <b>Facility Name</b> Roosevelt 66 <b>Address</b> 905 W. Roosevelt Maywood, IL 60153 <b>County</b> Cook <b>Contact Person</b> Sunny Vallikalam <b>Phone Number</b> (630) 669-0338	

**Incident Information**

IEMA Number: **20180158**  
 Type of release: **Other: Product was observed leaking from the product pump. Gasoline was observed going into the soil through a pipe penetration in the dispenser sump.**  
 How release was discovered: **Significant Event (ie, overfill, vandalism, etc)**  
 Is the UST owner/operator the US government: **No**  
 Is the UST owner/operator a rail carrier: **No**  
 Is the UST owner/operator located at an airport: **No**

**Tanks**

**Associated with Release**

Tank No.	Current Product	Product at time of release	Size (gal)	Installed	First Notified	Last Used	Removed	Abandoned Date
6	Gasoline	Gasoline	12000	8/13/2003	5/6/2004			
7	Gasoline	Gasoline	8000	8/13/2003	5/6/2004			

**All tanks for Roosevelt 66 on file**

Tank No.	Current Product	Size (gal)	Installed	First Notified	Last Used	Removed	Abandoned Date
1	Gasoline	4000		4/16/1990	10/1/1991	10/1/1991	
2	Gasoline	8000		4/16/1990	10/1/1991	10/17/1991	
3	Gasoline	10000		4/16/1990	10/1/1991	10/1/1991	
4	Used Oil	550		4/16/1990	10/1/1991	10/1/1991	
5	Heating Oil	500		2/19/1992	10/17/1991	10/17/1991	
6	Gasoline	12000	8/13/2003	5/6/2004			
7	Gasoline	8000	8/13/2003	5/6/2004			

## Attachments

Name	File Name(s)	Additional Information
Miscellaneous	<a href="#">Part 174 Definitions and Gas Storage Act.pdf</a>	As outlined in Title 41, Chapter I, Part 174, we have included the definitions of a UST system, which includes "ancillary equipment" which includes pumps and dispensers and the definition of a UST system, connected ancillary equipment is included.
Site Assessment Documents	<a href="#">20180319132804.pdf</a> <a href="#">20180320125240.pdf</a>	
IEMA Report	<a href="#">H-2018-0158.pdf</a>	
Site Plan	<a href="#">118102 - Maywood BP - SAF1.pdf</a>	
Certificate of Good Standing	<a href="#">GoodStandingPdf.pdf</a>	
Authorization to submit	<a href="#">EDA Authorization.pdf</a>	

**Joint Committee on Administrative Rules**  
**ADMINISTRATIVE CODE**

**TITLE 41: FIRE PROTECTION**  
**CHAPTER I: OFFICE OF THE STATE FIRE MARSHAL**  
**PART 174 GENERAL REQUIREMENTS FOR UNDERGROUND STORAGE TANKS AND**  
**THE STORAGE, TRANSPORTATION, SALE AND USE OF PETROLEUM AND OTHER**  
**REGULATED SUBSTANCES**  
**SECTION 174.100 DEFINITIONS**

**Section 174.100 Definitions**

The following definitions shall apply to 41 Ill. Adm. Code 174, 175, 176 and 177 concerning underground storage tanks and tank systems and the storage, transportation, sale and use of petroleum and other regulated substances.

Submitted  
with  
application

"Abandonment-in-place" is the permanent placement of a UST in an inoperative condition by filling it with inert material in accordance with 41 Ill. Adm. Code 175.840.

"American Suction" is any suction system other than European.

"Ancillary Equipment" means any devices including, but not limited to, piping, fittings, flanges, valves, pumps, dispensers, line leak detection equipment, ATG probes, interstitial tank sensors, sump sensors, flex connectors, and automatic overfill prevention devices used to distribute, meter or control the flow of regulated substances to and from a UST.

"ANSI" means American National Standards Institute.

"API" means American Petroleum Institute.

"ASTM" means American Society for Testing and Materials.

"Attendant" means the owner or any person who is employed by an owner of a motor fuel dispensing facility to dispense motor fuel at that facility.

"Blended Fuel" means gasoline containing greater than 10% ethanol and petroleum diesel containing greater than 20% biodiesel.

"Building" means any three dimensional space that is enclosed by a roof and walls where more than 50% of the possible area of the perimeter walls (sides) of the space is covered and not open to the outside.

"Bulk Storage" means the containment in a UST of a regulated substance for purposes of the bulk transfer or bulk transport of regulated substances and not for retail sale to the public.

"Cathodic Protection" is a technique to prevent corrosion of a metal surface by making that surface the cathode of an electrochemical cell. For example, a tank system can be cathodically protected through the application of either galvanic anodes or impressed current.

"Class I Liquids" – See Flammable Liquids.

"Tank Vehicle" means any tank truck, tank full-trailer, or tractor and tank semi-trailer combination.

"Tank Containment Sump" means a factory manufactured containment located at the tank at the submersible pump or the entry point of American suction piping at the tank that will prevent leaks from the product piping from reaching soil or groundwater.

"Ten Percent or More Beneath the Surface of the Ground", with reference to a tank, means that its volume (including the volume of its connected underground piping) is 10 percent or more beneath the ground surface or otherwise covered with earthen materials. If a tank is in a vault, it is considered "beneath the surface of the ground" if it cannot be viewed from all sides and top and base.

"Third Party", unless otherwise specified in the rule, when applied to a device or system, means an independent nationally recognized organization or independent professionally licensed individual that evaluates the device or system according to a nationally recognized practice. Examples include, but are not limited to, UL, UL CAN, ANSI, ASTM, NLPA, API or NWGLDE.

"UL" means Underwriters Laboratories, Inc.

"UL Canada" or "UL CAN" means Underwriters Laboratories of Canada.

"Under-dispenser Containment" or "UDC" means factory manufactured containment underneath a dispenser that will prevent leaks from the dispenser from reaching soil or groundwater. The containment must be liquid-tight on its sides, bottom and at any penetrations; be compatible with the substance conveyed by the piping; and allow for visual inspection and access to the components in the containment system and/or be monitored.

"Underground Storage Tank System" or "UST" means any one or combination of tanks (including connected underground pipes, connected ancillary equipment and connected cathodic protection) used to contain an accumulation of regulated substances, the volume of which (including the volume of underground connected pipes) is 10 percent or more beneath the surface of the ground. A UST does include an emergency power generator tank system that stores any classification of fuel for use exclusively, alternately or concurrently by an emergency power generator, except as otherwise excluded in this definition. The term "underground storage tank system" or "UST" does not include any pipes connected to any tank excluded from this definition. Underground storage tank system or UST does not include any tank system as follows:

Farm or residential tank with a capacity of 1,100 gallons or less used for storing motor fuel for noncommercial purposes;

Heating oil tank of any capacity used exclusively for storing heating oil for consumptive use on a farm or residence;

Septic tank;

Pipeline facility (including gathering lines):

Regulated under the Natural Gas Pipeline Safety Act of 1968 (49 USC 1671 et seq., recodified at 49 USC 60101 et seq.);

Regulated under the Hazardous Liquid Pipeline Safety Act of 1979 (49 USC 2001 et seq., recodified at 49 USC 60101 et seq.); or

Regulated under the Illinois Gas Pipeline Safety Act [220 ILCS 20];

(415 ILCS 5/57.9)

Sec. 57.9. Underground Storage Tank Fund; eligibility and deductibility.

(a) The Underground Storage Tank Fund shall be accessible by owners and operators who have a confirmed release from an underground storage tank or related tank system of a substance listed in this Section. The owner or operator is eligible to access the Underground Storage Tank Fund if the eligibility requirements of this Title are satisfied and:

- (1) Neither the owner nor the operator is the United States Government.
- (2) The tank does not contain fuel which is exempt from the Motor Fuel Tax Law.
- (3) The costs were incurred as a result of a confirmed release of any of the following substances:
  - (A) "Fuel", as defined in Section 1.19 of the Motor Fuel Tax Law.
  - (B) Aviation fuel.
  - (C) Heating oil.
  - (D) Kerosene.
  - (E) Used oil which has been refined from crude oil used in a motor vehicle, as defined in Section 1.3 of the Motor Fuel Tax Law.
- (4) The owner or operator registered the tank and paid all fees in accordance with the statutory and regulatory requirements of the Gasoline Storage Act.
- (5) The owner or operator notified the Illinois Emergency Management Agency of a confirmed release, the costs were incurred after the notification and the costs were a result of a release of a substance listed in this Section. Costs of corrective action or indemnification incurred before providing that notification shall not be eligible for payment.
- (6) The costs have not already been paid to the owner or operator under a private insurance policy, other written agreement, or court order.
- (7) The costs were associated with "corrective action" of this Act.

Submitted with application

If the underground storage tank which experienced a release of a substance listed in this Section was installed after July 28, 1989, the owner or operator is eligible to access the Underground Storage Tank Fund if it is demonstrated to the Office of the State Fire Marshal the tank was installed and operated in accordance with Office of the State Fire Marshal regulatory requirements. Office of the State Fire Marshal certification is prima facie evidence the tank was installed pursuant to the Office of the State Fire Marshal regulatory requirements.

(b) For releases reported prior to the effective date of this amendatory Act of the 96th General Assembly, an owner or operator may access the Underground Storage Tank Fund for costs associated with an Agency approved plan and the Agency shall approve the payment of costs associated with corrective action after the application of a \$10,000 deductible, except in the following situations:

- (1) A deductible of \$100,000 shall apply when none of the underground storage tanks were registered prior to July 28, 1989, except in the case of underground storage tanks used exclusively to store heating oil for consumptive use on the premises where stored and which serve other than farms or residential units, a deductible of \$100,000 shall apply when none of these tanks were registered prior to July 1, 1992.
- (2) A deductible of \$50,000 shall apply if any of the underground storage tanks were registered prior to July 28, 1989, and the State received notice of the confirmed release prior to July 28, 1989.
- (3) A deductible of \$15,000 shall apply when one or more, but not all, of the underground storage tanks were registered prior to July 28, 1989, and the State received

notice of the confirmed release on or after July 28, 1989.

For releases reported on or after the effective date of this amendatory Act of the 96th General Assembly, an owner or operator may access the Underground Storage Tank Fund for costs associated with an Agency approved plan, and the Agency shall approve the payment of costs associated with corrective action after the application of a \$5,000 deductible.

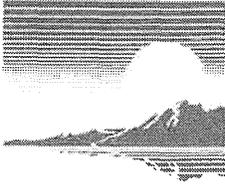
A deductible shall apply annually for each site at which costs were incurred under a claim submitted pursuant to this Title, except that if corrective action in response to an occurrence takes place over a period of more than one year, in subsequent years, no deductible shall apply for costs incurred in response to such occurrence.

(c) Eligibility and deductibility determinations shall be made by the Office of the State Fire Marshal.

(1) When an owner or operator reports a confirmed release of a regulated substance, the Office of the State Fire Marshal shall provide the owner or operator with an "Eligibility and Deductibility Determination" form. The form shall either be provided on-site or within 15 days of the Office of the State Fire Marshal receipt of notice indicating a confirmed release. The form shall request sufficient information to enable the Office of the State Fire Marshal to make a final determination as to owner or operator eligibility to access the Underground Storage Tank Fund pursuant to this Title and the appropriate deductible. The form shall be promulgated as a rule or regulation pursuant to the Illinois Administrative Procedure Act by the Office of the State Fire Marshal. Until such form is promulgated, the Office of State Fire Marshal shall use a form which generally conforms with this Act.

(2) Within 60 days of receipt of the "Eligibility and Deductibility Determination" form, the Office of the State Fire Marshal shall issue one letter enunciating the final eligibility and deductibility determination, and such determination or failure to act within the time prescribed shall be a final decision appealable to the Illinois Pollution Control Board.

(Source: P.A. 96-908, eff. 6-8-10.)



**First  
Environmental  
Laboratories, Inc.**

IL ELAP / NELAC Accreditation # 100292

1600 Shore Road • Naperville, Illinois 60563 • Phone (630) 778-1200 • Fax (630) 778-1233

*submitted with application*

March 19, 2018

Mr. Tahseen Qureshi  
**EAGLE ENVIRONMENTAL CONSULTANTS**  
3805 Illinois Ave.  
St. Charles, IL 60174

Project ID: Reliable Stores, Inc #118102  
First Environmental File ID: 18-1193  
Date Received: March 12, 2018

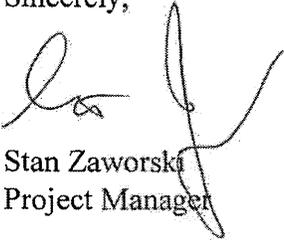
Dear Mr. Tahseen Qureshi:

The above referenced project was analyzed as directed on the enclosed chain of custody record.

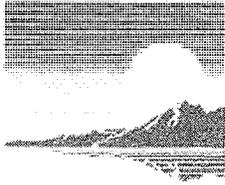
All Quality Control criteria as outlined in the methods and current IL ELAP/NELAP have been met unless otherwise noted. QA/QC documentation and raw data will remain on file for future reference. Our accreditation number is 100292 and our current certificate is number 004324: effective 02/27/2018 through 02/28/2019.

I thank you for the opportunity to be of service to you and look forward to working with you again in the future. Should you have any questions regarding any of the enclosed analytical data or need additional information, please contact me at (630) 778-1200.

Sincerely,



Stan Zaworski  
Project Manager



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Environmental  
Laboratories, Inc.**

IL ELAP / NELAC Accreditation # 100292

1600 Shore Road • Naperville, Illinois 60563 • Phone (630) 778-1200 • Fax (630) 778-1233

### Case Narrative

**EAGLE ENVIRONMENTAL CONSULTANTS**

Lab File ID: **18-1193**

Project ID: **Reliable Stores, Inc #118102**

Date Received: **March 12, 2018**

All quality control criteria, as outlined in the methods, have been met except as noted below or on the following analytical report.

The results in this report apply to the samples in the following table:

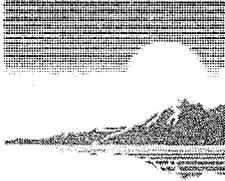
Laboratory Sample ID	Client Sample Identifier	Date/Time Collected
18-1193-001	EA-1 (1-3)	03/09/18 12:00
18-1193-002	EA-1 (5-7)	03/09/18 12:15
18-1193-003	EA-2 (1-3)	03/09/18 13:00
18-1193-004	EA-2 (5-7)	03/09/18 13:15
18-1193-005	EA-3 (1-3)	03/09/18 14:00
18-1193-006	EA-3 (5-7)	03/09/18 14:15

**Sample Batch Comments:**

Sample acceptance criteria were met.

**Method Comments**

Lab Number	Sample ID	Comments:
18-1193-006	EA-3 (5-7)	<i>BTEX Organic Compounds</i> The reporting limits are elevated due to matrix interference.



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### Case Narrative

**EAGLE ENVIRONMENTAL CONSULTANTS**

Lab File ID: **18-1193**

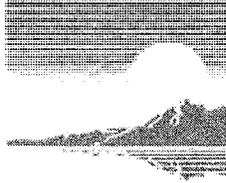
Project ID: **Reliable Stores, Inc #118102**

Date Received: **March 12, 2018**

All quality control criteria, as outlined in the methods, have been met except as noted below or on the following analytical report.

The following is a definition of flags that may be used in this report:

Flag	Description	Flag	Description
A	Method holding time is 15 minutes from collection. Lab analysis was performed as soon as possible.		
B	Analyte was found in the method blank.	L	LCS recovery outside control limits.
<	Analyte not detected at or above the reporting limit.	M	MS recovery outside control limits; LCS acceptable.
C	Sample received in an improper container for this test.	P	Chemical preservation pH adjusted in lab.
D	Surrogates diluted out; recovery not available.	Q	Result was determined by a GC/MS database search.
E	Estimated result; concentration exceeds calibration range.	S	Analysis was subcontracted to another laboratory.
G	Surrogate recovery outside control limits.	T	Result is less than three times the MDL value.
H	Analysis or extraction holding time exceeded.	W	Reporting limit elevated due to sample matrix.
J	Estimated result; concentration is less than routine RL but greater than MDL.	N	Analyte is not part of our NELAC accreditation or accreditation may not be available for this parameter.
RL	Routine Reporting Limit (Lowest amount that can be detected when routine weights/volumes are used without dilution.)	ND	Analyte was not detected using a library search routine; No calibration standard was analyzed.



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### Analytical Report

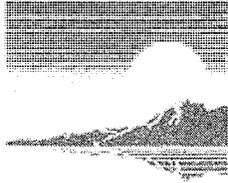
**Client:** EAGLE ENVIRONMENTAL CONSULTANTS  
**Project ID:** Reliable Stores, Inc #118102  
**Sample ID:** EA-1 (1-3)  
**Sample No:** 18-1193-001

**Date Collected:** 03/09/18  
**Time Collected:** 12:00  
**Date Received:** 03/12/18  
**Date Reported:** 03/19/18

Results are reported on a dry weight basis.

Analyte	Result	R.L.	Units	Flags
<b>Solids, Total</b>		<b>Method: 2540B</b>		
Analysis Date: 03/13/18 15:12				
Total Solids	84.39		%	
<b>BTEX Organic Compounds</b>		<b>Method: 5035A/8260B</b>		
Analysis Date: 03/13/18				
Benzene	< 5.0	5.0	ug/kg	
Ethylbenzene	< 5.0	5.0	ug/kg	
Methyl-tert-butylether (MTBE)	< 5.0	5.0	ug/kg	
Toluene	< 5.0	5.0	ug/kg	
Xylene, Total	< 5.0	5.0	ug/kg	

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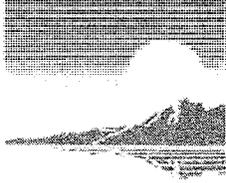
1600 Shore Road • Naperville, Illinois 60563 • Phone (630) 778-1200 • Fax (630) 778-1233

**Analytical Report**

<b>Client:</b>	EAGLE ENVIRONMENTAL CONSULTANTS	<b>Date Collected:</b>	03/09/18
<b>Project ID:</b>	Reliable Stores, Inc #118102	<b>Time Collected:</b>	12:15
<b>Sample ID:</b>	EA-1 (5-7)	<b>Date Received:</b>	03/12/18
<b>Sample No:</b>	18-1193-002	<b>Date Reported:</b>	03/19/18

Results are reported on a dry weight basis.

Analyte	Result	R.L.	Units	Flags
<b>Solids, Total</b>		<b>Method: 2540B</b>		
Analysis Date: 03/13/18 15:12				
Total Solids	83.64		%	
<b>BTEX Organic Compounds</b>		<b>Method: 5035A/8260B</b>		
Analysis Date: 03/13/18				
Benzene	< 5.0	5.0	ug/kg	
Ethylbenzene	< 5.0	5.0	ug/kg	
Methyl-tert-butylether (MTBE)	< 5.0	5.0	ug/kg	
Toluene	< 5.0	5.0	ug/kg	
Xylene, Total	< 5.0	5.0	ug/kg	



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**Analytical Report**

<b>Client:</b>	EAGLE ENVIRONMENTAL CONSULTANTS	<b>Date Collected:</b>	03/09/18
<b>Project ID:</b>	Reliable Stores, Inc #118102	<b>Time Collected:</b>	13:00
<b>Sample ID:</b>	EA-2 (1-3)	<b>Date Received:</b>	03/12/18
<b>Sample No:</b>	18-1193-003	<b>Date Reported:</b>	03/19/18

Results are reported on a dry weight basis.

Analyte	Result	R.L.	Units	Flags
<b>Solids, Total</b>		<b>Method: 2540B</b>		
Analysis Date: 03/13/18 15:12				
Total Solids	96.04		%	
<b>BTEX Organic Compounds</b>		<b>Method: 5035A/8260B</b>		
Analysis Date: 03/13/18				
Benzene	< 5.0	5.0	ug/kg	
Ethylbenzene	< 5.0	5.0	ug/kg	
Methyl-tert-butylether (MTBE)	< 5.0	5.0	ug/kg	
Toluene	< 5.0	5.0	ug/kg	
Xylene, Total	< 5.0	5.0	ug/kg	

R37



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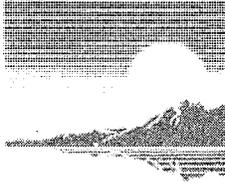
**Analytical Report**

<b>Client:</b>	EAGLE ENVIRONMENTAL CONSULTANTS	<b>Date Collected:</b>	03/09/18
<b>Project ID:</b>	Reliable Stores, Inc #118102	<b>Time Collected:</b>	13:15
<b>Sample ID:</b>	EA-2 (5-7)	<b>Date Received:</b>	03/12/18
<b>Sample No:</b>	18-1193-004	<b>Date Reported:</b>	03/19/18

Results are reported on a dry weight basis.

Analyte	Result	R.L.	Units	Flags
<b>Solids, Total</b>		<b>Method: 2540B</b>		
Analysis Date: 03/13/18 15:12				
Total Solids	81.24		%	
<b>BTEX Organic Compounds</b>		<b>Method: 5035A/8260B</b>		
Analysis Date: 03/13/18				
Benzene	< 5.0	5.0	ug/kg	
Ethylbenzene	< 5.0	5.0	ug/kg	
Methyl-tert-butylether (MTBE)	< 5.0	5.0	ug/kg	
Toluene	< 5.0	5.0	ug/kg	
Xylene, Total	< 5.0	5.0	ug/kg	

R38



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**Analytical Report**

<b>Client:</b>	EAGLE ENVIRONMENTAL CONSULTANTS	<b>Date Collected:</b>	03/09/18
<b>Project ID:</b>	Reliable Stores, Inc #118102	<b>Time Collected:</b>	14:00
<b>Sample ID:</b>	EA-3 (1-3)	<b>Date Received:</b>	03/12/18
<b>Sample No:</b>	18-1193-005	<b>Date Reported:</b>	03/19/18

Results are reported on a dry weight basis.

Analyte	Result	R.L.	Units	Flags
<b>Solids, Total</b>		<b>Method: 2540B</b>		
Analysis Date: 03/13/18 15:12				
Total Solids	80.26		%	
<b>BTEX Organic Compounds</b>		<b>Method: 5035A/8260B</b>		
Analysis Date: 03/13/18				
Benzene	30.6	5.0	ug/kg	
Ethylbenzene	8.7	5.0	ug/kg	
Methyl-tert-butylether (MTBE)	< 5.0	5.0	ug/kg	
Toluene	< 5.0	5.0	ug/kg	
Xylene, Total	18.8	5.0	ug/kg	



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### Analytical Report

**Client:** EAGLE ENVIRONMENTAL CONSULTANTS  
**Project ID:** Reliable Stores, Inc #118102  
**Sample ID:** EA-3 (5-7)  
**Sample No:** 18-1193-006

**Date Collected:** 03/09/18  
**Time Collected:** 14:15  
**Date Received:** 03/12/18  
**Date Reported:** 03/19/18

Results are reported on a dry weight basis.

Analyte	Result	R.L.	Units	Flags
<b>Solids, Total</b>		<b>Method: 2540B</b>		
Analysis Date: 03/13/18 15:12				
Total Solids	83.03		%	
<b>BTEX Organic Compounds</b>		<b>Method: 5035A/8260B</b>		
Analysis Date: 03/14/18				
Benzene	212	5.0	ug/kg	
Ethylbenzene	1,010	5.0	ug/kg	
Methyl-tert-butylether (MTBE)	< 320	5.0	ug/kg	
Toluene	< 500	5.0	ug/kg	
Xylene, Total	< 500	5.0	ug/kg	



**First Environmental Laboratories**

1600 Shore Road, Suite D  
 Naperville, Illinois 60563  
 Phone: (630) 778-1200 • Fax: (630) 778-1233  
 E-mail: firstinfo@firstenv.com • www.firstenv.com  
 IEPA Certification #100292

Company Name: Eagle Environmental Consultants, LLC  
 Street Address: 3805 Illinois Avenue  
 City: St. Charles State: IL Zip: 62014  
 Phone: on file e-mail: on file  
 Send Report To: Tahseen Qureshi  
 Sampled By: Kwil + Dahl

**Analyses**

Project I.D.: Reliable Stores, Inc.  
 P.O. #: 118102

Matrix Codes: S = Soil W = Water O = Other

Date/Time Taken	Sample Description	Matrix	BTEX/MTBE							Comments	Lab I.D.
3/9/2018 1200	EA-1 (1-3)	S	X								18-1193-001
1215	EA-1 (5-7)	S	X								002
1300	EA-2 (1-3)	S	X								003
1315	EA-2 (5-7)	S	X								004
1400	EA-3 (3-5)	S	X								005
1415	EA-3 (5-7)	S	X								006

**FOR LAB USE ONLY:**

Cooler Temperature: 0.1-6°C Yes  No  \_\_\_\_\_ °C  
 Received within 6 hrs. of collection: \_\_\_\_\_  
 Ice Present: Yes  No  \_\_\_\_\_  
 Sample Refrigerated: Yes  No  \_\_\_\_\_  
 Refrigerator Temperature: \_\_\_\_\_ °C  
 5035 Vials Frozen: Yes  No  \_\_\_\_\_  
 Freezer Temperature: \_\_\_\_\_ °C  
 Program:  TACO/SRP  CCDD  NPDES  LUST  SDWA

Notes and Special Instructions: \_\_\_\_\_

Relinquished By: [Signature] Date/Time: 3/10/18 1353 Received By: [Signature] Date/Time: 3/12/18 1335  
 Relinquished By: \_\_\_\_\_ Date/Time: \_\_\_\_\_ Received By: \_\_\_\_\_ Date/Time: \_\_\_\_\_

R40



# Illinois Environmental Protection Agency

Bureau of Land • 1021 N. Grand Avenue E. • P.O. Box 19276 • Springfield • Illinois • 62794-9276

The Agency is authorized to require this information under Section 4 and Title XVI of the Environmental Protection Act (415 ILCS 5/4, 5/57 – 57.17). Failure to disclose this information may result in a civil penalty of not to exceed \$50,000.00 for the violation and an additional civil penalty of not to exceed \$10,000.00 for each day during which the violation continues (415 ILCS 5/42). Any person who knowingly makes a false material statement or representation, orally or in writing, in any label, manifest, record, report, permit, or license, or other document filed, maintained or used for the purpose of compliance with Title XVI commits a Class 4 felony. Any second or subsequent offense after conviction hereunder is a Class 3 felony (415 ILCS 5/44 and 57.17). This form has been approved by the Forms Management Center.

## Leaking Underground Storage Tank Program Laboratory Certification for Chemical Analysis

### A. Site Identification

IEMA Incident # (6- or 8-digit): 180158 IEPA LPC# (10-digit): 0311835047  
Site Name: Reliable Stores, Inc.  
Site Address (Not a P.O. Box): 905 West Roosevelt Road  
City: Maywood County: Cook ZIP Code: 60153

Leaking UST Technical File

### B. Sample Collector

I certify that:

1. Appropriate sampling equipment/methods were utilized to obtain representative samples.
2. Chain-of-custody procedures were followed in the field.
3. Sample integrity was maintained by proper preservation.
4. All samples were properly labeled.

RR/AD  
(Initial)  
RR/AD  
(Initial)  
RR/AD  
(Initial)  
RR/AD  
(Initial)

### C. Laboratory Representative

I certify that:

1. Proper chain-of-custody procedures were followed as documented on the chain-of-custody forms
2. Sample integrity was maintained by proper preservation.
3. All samples were properly labeled.
4. Quality assurance/quality control procedures were established and carried out.
5. Sample holding times were not exceeded.

SSV  
(Initial)  
SSV  
(Initial)  
SSV  
(Initial)  
SSV  
(Initial)  
SSV  
(Initial)

R42

- 6. SW-846 Analytical Laboratory Procedure (USEPA) methods were used for the analyses.
- 7. An accredited lab performed quantitative analysis using test methods identified in 35 IAC 186.180 (for samples collected on or after January 1, 2003).

SSL ✓  
 (Initial)  
 SS ✓  
 (Initial)

**D. Signatures**

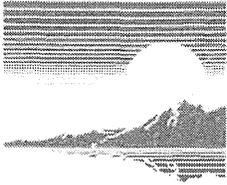
I hereby affirm that all information contained in this form is true and accurate to the best of my knowledge and belief. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations:

**Sample Collector**

Name Kevin Kwil / Alison Dahl  
 Title Senior Project Manager / Geologist I  
 Company Eagle Environmental Consultants, LLC  
 Address 3805 Illinois Avenue  
 City Saint Charles  
 State Illinois  
 Zip Code 60174  
 Phone 630-940-2540  
 Signature *Kevin Kwil / Alison Dahl*  
 Date 3/9/18

**Laboratory Representative**

Name Bill Mottashed  
 Title Project Manager  
 Company First Environmental Laboratories, Inc.  
 Address 1600 Shore Road  
 City Naperville  
 State Illinois  
 Zip Code 60563  
 Phone 630-778-1200  
 Signature *Bill Mottashed* FOR WHM  
 Date 3/9/18



**First  
Environmental  
Laboratories, Inc.**

IL ELAP / NELAC Accreditation # 100292

1600 Shore Road • Naperville, Illinois 60563 • Phone (630) 778-1200 • Fax (630) 778-1233

March 20, 2018

Mr. Tahseen Qureshi  
**EAGLE ENVIRONMENTAL CONSULTANTS**  
3805 Illinois Ave.  
St. Charles, IL 60174

Project ID: Reliable Stoves - 118102  
First Environmental File ID: 18-1225  
Date Received: March 13, 2018

Dear Mr. Tahseen Qureshi:

The above referenced project was analyzed as directed on the enclosed chain of custody record.

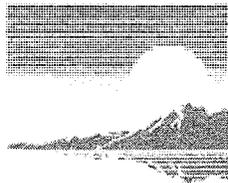
All Quality Control criteria as outlined in the methods and current IL ELAP/NELAP have been met unless otherwise noted. QA/QC documentation and raw data will remain on file for future reference. Our accreditation number is 100292 and our current certificate is number 004324; effective 02/27/2018 through 02/28/2019.

I thank you for the opportunity to be of service to you and look forward to working with you again in the future. Should you have any questions regarding any of the enclosed analytical data or need additional information, please contact me at (630) 778-1200.

Sincerely,



Stan Zaworski  
Project Manager



**First  
Environmental  
Laboratories, Inc.**

IL ELAP / NELAC Accreditation # 100292

1600 Shore Road • Naperville, Illinois 60563 • Phone (630) 778-1200 • Fax (630) 778-1233

### Case Narrative

**EAGLE ENVIRONMENTAL CONSULTANTS**

Lab File ID: **18-1225**

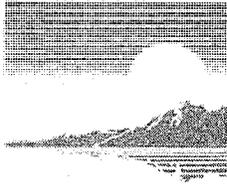
Project ID: **Reliable Stoves - 118102**

Date Received: **March 13, 2018**

All quality control criteria, as outlined in the methods, have been met except as noted below or on the following analytical report.

The results in this report apply to the samples in the following table:

Laboratory Sample ID	Client Sample Identifier	Date/Time Collected
18-1225-001	EA-4 (3-5)	03/12/18 9:00
18-1225-002	EA-4 (5-7)	03/12/18 9:05
18-1225-003	EA-5 (3-5)	03/12/18 9:15
18-1225-004	EA-5 (5-7)	03/12/18 9:20
18-1225-005	EA-6 (3-5)	03/12/18 9:30
18-1225-006	EA-6 (5-7)	03/12/18 9:35
18-1225-007	EA-7 (3-5)	03/12/18 9:45
18-1225-008	EA-7 (5-7)	03/12/18 9:50
18-1225-009	EA-8 (1-3)	03/12/18 10:10
18-1225-010	EA-8 (5-7)	03/12/18 10:15
18-1225-011	EA-9 (1-3)	03/12/18 10:30
18-1225-012	EA-9 (5-7)	03/12/18 10:35
18-1225-013	EA-10 (1-3)	03/12/18 10:50
18-1225-014	EA-10 (5-7)	03/12/18 10:55
18-1225-015	EA-11 (3-5)	03/12/18 11:10
18-1225-016	EA-11 (7-8)	03/12/18 11:15
18-1225-017	EA-12 (3-5)	03/12/18 11:30
18-1225-018	EA-12 (5-7)	03/12/18 11:35
18-1225-019	EA-13 (3-5)	03/12/18 11:50
18-1225-020	EA-13 (5-7)	03/12/18 11:55
18-1225-021	EA-14 (1-3)	03/12/18 12:10
18-1225-022	EA-14 (5-7)	03/12/18 12:15
18-1225-023	EA-15 (1-3)	03/12/18 12:30
18-1225-024	EA-15 (5-6)	03/12/18 12:35
18-1225-025	EA-16 (3-5)	03/12/18 12:50
18-1225-026	EA-16 (5-6)	03/12/18 12:55



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### Case Narrative

EAGLE ENVIRONMENTAL CONSULTANTS

Lab File ID: 18-1225

Project ID: Reliable Stoves - 118102

Date Received: March 13, 2018

All quality control criteria, as outlined in the methods, have been met except as noted below or on the following analytical report.

18-1225-027	EA-17 (1-3)	03/12/18	13:10
18-1225-028	EA-17 (5-7)	03/12/18	13:15

#### Sample Batch Comments:

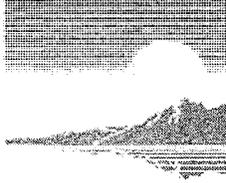
Sample acceptance criteria were met.

#### Method Comments

Lab Number	Sample ID	Comments:
18-1225-002	EA-4 (5-7)	<i>BTEX Organic Compounds</i> The reporting limits are elevated due to matrix interference.
18-1225-004	EA-5 (5-7)	<i>BTEX Organic Compounds</i> The reporting limits are elevated due to matrix interference.
18-1225-015	EA-11 (3-5)	<i>BTEX Organic Compounds</i> The reporting limits are elevated due to matrix interference.
18-1225-016	EA-11 (7-8)	<i>BTEX Organic Compounds</i> The reporting limits are elevated due to matrix interference.
18-1225-020	EA-13 (5-7)	<i>BTEX Organic Compounds</i> The reporting limits are elevated due to matrix interference.

The following is a definition of flags that may be used in this report:

Flag	Description	Flag	Description
A	Method holding time is 15 minutes from collection. Lab analysis was performed as soon as possible.		
B	Analyte was found in the method blank.	L	LCS recovery outside control limits.
<	Analyte not detected at or above the reporting limit.	M	MS recovery outside control limits; LCS acceptable.
C	Sample received in an improper container for this test.	P	Chemical preservation pH adjusted in lab.
D	Surrogates diluted out; recovery not available.	Q	Result was determined by a GC/MS database search.
E	Estimated result; concentration exceeds calibration range.	S	Analysis was subcontracted to another laboratory.
G	Surrogate recovery outside control limits.	T	Result is less than three times the MDL value.
H	Analysis or extraction holding time exceeded.	W	Reporting limit elevated due to sample matrix.
J	Estimated result; concentration is less than routine RL but greater than MDL.	N	Analyte is not part of our NELAC accreditation or accreditation may not be available for this parameter.
RL	Routine Reporting Limit (Lowest amount that can be detected when routine weights/volumes are used without dilution.)	ND	Analyte was not detected using a library search routine; No calibration standard was analyzed.



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### Analytical Report

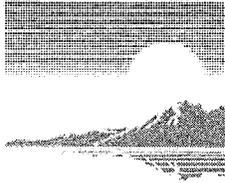
**Client:** EAGLE ENVIRONMENTAL CONSULTANTS **Date Collected:** 03/12/18  
**Project ID:** Reliable Stoves - 118102 **Time Collected:** 9:00  
**Sample ID:** EA-4 (3-5) **Date Received:** 03/13/18  
**Sample No:** 18-1225-001 **Date Reported:** 03/20/18

Results are reported on a dry weight basis.

Analyte	Result	R.L.	Units	Flags
<b>Solids, Total</b> <span style="float: right;"><b>Method: 2540B</b></span>				
Analysis Date: 03/14/18 14:00				
Total Solids	94.50		%	
<b>BTEX Organic Compounds</b> <span style="float: right;"><b>Method: 5035A/8260B</b></span>				
Analysis Date: 03/15/18				
Benzene	< 5.0	5.0	ug/kg	
Ethylbenzene	< 5.0	5.0	ug/kg	
Methyl-tert-butylether (MTBE)	< 5.0	5.0	ug/kg	
Toluene	< 5.0	5.0	ug/kg	
Xylene, Total	9.2	5.0	ug/kg	

<i>Sample QC Summary:</i>		<i>Surrogate Recovery</i>		<i>%R Limits</i>	
<i>Method</i>	<i>Analyte</i>	<i>QC Result</i>		<i>Low</i>	<i>High</i>
5035A/8260B	4-Bromofluorobenzene (Surr)	%R:	107.5	86	117
5035A/8260B	d8-Toluene (Surr)	%R:	100.9	90	110
5035A/8260B	Dibromofluoromethane (Surr)	%R:	97.2	77	120

R47



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### Analytical Report

**Client:** EAGLE ENVIRONMENTAL CONSULTANTS  
**Project ID:** Reliable Stoves - 118102  
**Sample ID:** EA-4 (5-7)  
**Sample No:** 18-1225-002

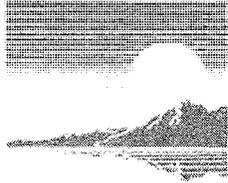
**Date Collected:** 03/12/18  
**Time Collected:** 9:05  
**Date Received:** 03/13/18  
**Date Reported:** 03/20/18

Results are reported on a dry weight basis.

Analyte	Result	R.L.	Units	Flags
<b>Solids, Total</b>		<b>Method: 2540B</b>		
Analysis Date: 03/14/18 14:00				
Total Solids	89.47		%	
<b>BTEX Organic Compounds</b>		<b>Method: 5035A/8260B</b>		
Analysis Date: 03/16/18				
Benzene	33.3	5.0	ug/kg	
Ethylbenzene	< 500	5.0	ug/kg	
Methyl-tert-butylether (MTBE)	< 320	5.0	ug/kg	
Toluene	< 500	5.0	ug/kg	
Xylene, Total	< 500	5.0	ug/kg	

**Sample QC Summary: Surrogate Recovery**

Method	Analyte	QC Result	%R Limits	
			Low	High
5035A/8260B	4-Bromofluorobenzene (Surr)	%R: 103.2	86	117
5035A/8260B	d8-Toluene (Surr)	%R: 99.7	90	110
5035A/8260B	Dibromofluoromethane (Surr)	%R: 93.2	77	120



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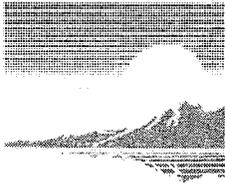
### Analytical Report

**Client:** EAGLE ENVIRONMENTAL CONSULTANTS **Date Collected:** 03/12/18  
**Project ID:** Reliable Stoves - 118102 **Time Collected:** 9:15  
**Sample ID:** EA-5 (3-5) **Date Received:** 03/13/18  
**Sample No:** 18-1225-003 **Date Reported:** 03/20/18

Results are reported on a dry weight basis.

Analyte	Result	R.L.	Units	Flags
<b>Solids, Total</b>		<b>Method: 2540B</b>		
Analysis Date: 03/14/18 14:00				
Total Solids	96.15		%	
<b>BTEX Organic Compounds</b>		<b>Method: 5035A/8260B</b>		
Analysis Date: 03/15/18				
Benzene	< 5.0	5.0	ug/kg	
Ethylbenzene	< 5.0	5.0	ug/kg	
Methyl-tert-butylether (MTBE)	< 5.0	5.0	ug/kg	
Toluene	< 5.0	5.0	ug/kg	
Xylene, Total	< 5.0	5.0	ug/kg	

<b>Sample QC Summary:</b>		<b>Surrogate Recovery</b>		<b>%R Limits</b>	
<i>Method</i>	<i>Analyte</i>	<i>QC Result</i>	<i>Low</i>	<i>High</i>	
5035A/8260B	4-Bromofluorobenzene (Surr)	%R: 104.8	86	117	
5035A/8260B	d8-Toluene (Surr)	%R: 101	90	110	
5035A/8260B	Dibromofluoromethane (Surr)	%R: 97.7	77	120	



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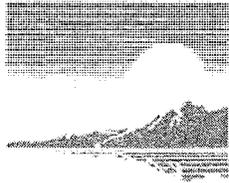
### Analytical Report

**Client:** EAGLE ENVIRONMENTAL CONSULTANTS **Date Collected:** 03/12/18  
**Project ID:** Reliable Stoves - 118102 **Time Collected:** 9:20  
**Sample ID:** EA-5 (5-7) **Date Received:** 03/13/18  
**Sample No:** 18-1225-004 **Date Reported:** 03/20/18

Results are reported on a dry weight basis.

Analyte	Result	R.L.	Units	Flags
<b>Solids, Total</b> <span style="float: right;"><b>Method: 2540B</b></span>				
Analysis Date: 03/14/18 14:00				
Total Solids	91.14		%	
<b>BTEX Organic Compounds</b> <span style="float: right;"><b>Method: 5035A/8260B</b></span>				
Analysis Date: 03/16/18				
Benzene	< 25.0	5.0	ug/kg	
Ethylbenzene	< 500	5.0	ug/kg	
Methyl-tert-butylether (MTBE)	< 320	5.0	ug/kg	
Toluene	< 500	5.0	ug/kg	
Xylene, Total	< 500	5.0	ug/kg	

<b>Sample QC Summary:</b>		<b>Surrogate Recovery</b>		<b>%R Limits</b>	
<i>Method</i>	<i>Analyte</i>	<i>QC Result</i>		<i>Low</i>	<i>High</i>
5035A/8260B	4-Bromofluorobenzene (Surr)	%R:	102.1	86 - 117	
5035A/8260B	d8-Toluene (Surr)	%R:	99.2	90 - 110	
5035A/8260B	Dibromofluoromethane (Surr)	%R:	90.2	77 - 120	



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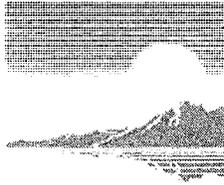
### Analytical Report

**Client:** EAGLE ENVIRONMENTAL CONSULTANTS **Date Collected:** 03/12/18  
**Project ID:** Reliable Stoves - 118102 **Time Collected:** 9:30  
**Sample ID:** EA-6 (3-5) **Date Received:** 03/13/18  
**Sample No:** 18-1225-005 **Date Reported:** 03/20/18

Results are reported on a dry weight basis.

Analyte	Result	R.L.	Units	Flags
<b>Solids, Total</b>		<b>Method: 2540B</b>		
Analysis Date: 03/14/18 14:00				
Total Solids	94.91		%	
<b>BTEX Organic Compounds</b>		<b>Method: 5035A/8260B</b>		
Analysis Date: 03/16/18				
Benzene	< 5.0	5.0	ug/kg	
Ethylbenzene	< 5.0	5.0	ug/kg	
Methyl-tert-butylether (MTBE)	< 5.0	5.0	ug/kg	
Toluene	< 5.0	5.0	ug/kg	
Xylene, Total	< 5.0	5.0	ug/kg	

<b>Sample QC Summary:</b>		<b>Surrogate Recovery</b>		<b>%R Limits</b>	
<i>Method</i>	<i>Analyte</i>	<i>QC Result</i>		<i>Low</i>	<i>High</i>
5035A/8260B	4-Bromofluorobenzene (Surr)	%R:	105.3	86 - 117	
5035A/8260B	d8-Toluene (Surr)	%R:	101.1	90 - 110	
5035A/8260B	Dibromofluoromethane (Surr)	%R:	102.7	77 - 120	



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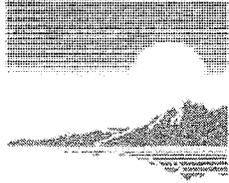
### Analytical Report

**Client:** EAGLE ENVIRONMENTAL CONSULTANTS **Date Collected:** 03/12/18  
**Project ID:** Reliable Stoves - 118102 **Time Collected:** 9:35  
**Sample ID:** EA-6 (5-7) **Date Received:** 03/13/18  
**Sample No:** 18-1225-006 **Date Reported:** 03/20/18

Results are reported on a dry weight basis.

Analyte	Result	R.L.	Units	Flags
<b>Solids, Total</b>		<b>Method: 2540B</b>		
Analysis Date: 03/14/18 14:00				
Total Solids	95.41		%	
<b>BTEX Organic Compounds</b>		<b>Method: 5035A/8260B</b>		
Analysis Date: 03/16/18				
Benzene	< 5.0	5.0	ug/kg	
Ethylbenzene	< 5.0	5.0	ug/kg	
Methyl-tert-butylether (MTBE)	< 5.0	5.0	ug/kg	
Toluene	< 5.0	5.0	ug/kg	
Xylene, Total	< 5.0	5.0	ug/kg	

<b>Sample QC Summary:</b>		<b>Surrogate Recovery</b>		<b>%R Limits</b>	
<i>Method</i>	<i>Analyte</i>	<i>QC Result</i>		<i>Low</i>	<i>High</i>
5035A/8260B	4-Bromofluorobenzene (Surr)	%R:	106.4	86 - 117	
5035A/8260B	d8-Toluene (Surr)	%R:	100	90 - 110	
5035A/8260B	Dibromofluoromethane (Surr)	%R:	99.6	77 - 120	



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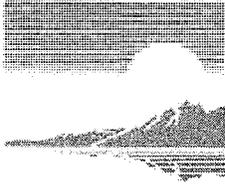
**Analytical Report**

**Client:** EAGLE ENVIRONMENTAL CONSULTANTS **Date Collected:** 03/12/18  
**Project ID:** Reliable Stoves - 118102 **Time Collected:** 9:45  
**Sample ID:** EA-7 (3-5) **Date Received:** 03/13/18  
**Sample No:** 18-1225-007 **Date Reported:** 03/20/18

Results are reported on a dry weight basis.

Analyte	Result	R.L.	Units	Flags
<b>Solids, Total</b> <span style="float: right;"><b>Method: 2540B</b></span>				
Analysis Date: 03/14/18 14:00				
Total Solids	79.92		%	
<b>BTEX Organic Compounds</b> <span style="float: right;"><b>Method: 5035A/8260B</b></span>				
Analysis Date: 03/16/18				
Benzene	< 5.0	5.0	ug/kg	
Ethylbenzene	< 5.0	5.0	ug/kg	
Methyl-tert-butylether (MTBE)	< 5.0	5.0	ug/kg	
Toluene	< 5.0	5.0	ug/kg	
Xylene, Total	< 5.0	5.0	ug/kg	

<i>Sample QC Summary:</i>		<i>Surrogate Recovery</i>		<i>%R Limits</i>	
<i>Method</i>	<i>Analyte</i>	<i>QC Result</i>		<i>Low</i>	<i>High</i>
5035A/8260B	4-Bromofluorobenzene (Surr)	%R:	107.4	86 -	117
5035A/8260B	d8-Toluene (Surr)	%R:	97.7	90 -	110
5035A/8260B	Dibromofluoromethane (Surr)	%R:	98.9	77 -	120



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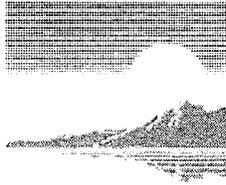
### Analytical Report

**Client:** EAGLE ENVIRONMENTAL CONSULTANTS **Date Collected:** 03/12/18  
**Project ID:** Reliable Stoves - 118102 **Time Collected:** 9:50  
**Sample ID:** EA-7 (5-7) **Date Received:** 03/13/18  
**Sample No:** 18-1225-008 **Date Reported:** 03/20/18

Results are reported on a dry weight basis.

Analyte	Result	R.L.	Units	Flags
<b>Solids, Total</b>		<b>Method: 2540B</b>		
Analysis Date: 03/14/18 14:00				
Total Solids	82.26		%	
<b>BTEX Organic Compounds</b>		<b>Method: 5035A/8260B</b>		
Analysis Date: 03/16/18				
Benzene	< 5.0	5.0	ug/kg	
Ethylbenzene	< 5.0	5.0	ug/kg	
Methyl-tert-butylether (MTBE)	< 5.0	5.0	ug/kg	
Toluene	< 5.0	5.0	ug/kg	
Xylene, Total	< 5.0	5.0	ug/kg	

<b>Sample QC Summary:</b>		<b>Surrogate Recovery</b>		<b>%R Limits</b>	
<i>Method</i>	<i>Analyte</i>	<i>QC Result</i>	<i>Low</i>	<i>High</i>	
5035A/8260B	4-Bromofluorobenzene (Surr)	%R: 105.7	86	117	
5035A/8260B	d8-Toluene (Surr)	%R: 97.5	90	110	
5035A/8260B	Dibromofluoromethane (Surr)	%R: 96.9	77	120	



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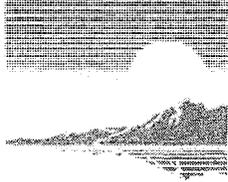
### Analytical Report

**Client:** EAGLE ENVIRONMENTAL CONSULTANTS **Date Collected:** 03/12/18  
**Project ID:** Reliable Stoves - 118102 **Time Collected:** 10:10  
**Sample ID:** EA-8 (1-3) **Date Received:** 03/13/18  
**Sample No:** 18-1225-009 **Date Reported:** 03/20/18

Results are reported on a dry weight basis.

Analyte	Result	R.L.	Units	Flags
<b>Solids, Total</b>		<b>Method: 2540B</b>		
Analysis Date: 03/14/18 14:00				
Total Solids	81.53		%	
<b>BTEX Organic Compounds</b>		<b>Method: 5035A/8260B</b>		
Analysis Date: 03/16/18				
Benzene	< 5.0	5.0	ug/kg	
Ethylbenzene	< 5.0	5.0	ug/kg	
Methyl-tert-butylether (MTBE)	< 5.0	5.0	ug/kg	
Toluene	< 5.0	5.0	ug/kg	
Xylene, Total	< 5.0	5.0	ug/kg	

<i>Sample QC Summary:</i>		<i>Surrogate Recovery</i>		<i>%R Limits</i>	
<i>Method</i>	<i>Analyte</i>	<i>QC Result</i>		<i>Low</i>	<i>High</i>
5035A/8260B	4-Bromofluorobenzene (Surr)	%R:	98.9	86 - 117	
5035A/8260B	d8-Toluene (Surr)	%R:	101.3	90 - 110	
5035A/8260B	Dibromofluoromethane (Surr)	%R:	114.1	77 - 120	



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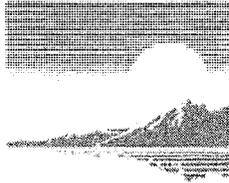
### Analytical Report

**Client:** EAGLE ENVIRONMENTAL CONSULTANTS **Date Collected:** 03/12/18  
**Project ID:** Reliable Stoves - 118102 **Time Collected:** 10:15  
**Sample ID:** EA-8 (5-7) **Date Received:** 03/13/18  
**Sample No:** 18-1225-010 **Date Reported:** 03/20/18

Results are reported on a dry weight basis.

Analyte	Result	R.L.	Units	Flags
<b>Solids, Total</b>		<b>Method: 2540B</b>		
Analysis Date: 03/14/18 14:00				
Total Solids	89.87		%	
<b>BTEX Organic Compounds</b>		<b>Method: 5035A/8260B</b>		
Analysis Date: 03/19/18				
Benzene	< 5.0	5.0	ug/kg	
Ethylbenzene	< 5.0	5.0	ug/kg	
Methyl-tert-butylether (MTBE)	< 5.0	5.0	ug/kg	
Toluene	< 5.0	5.0	ug/kg	
Xylene, Total	< 5.0	5.0	ug/kg	

<b>Sample QC Summary:</b>		<b>Surrogate Recovery</b>		<b>%R Limits</b>	
<i>Method</i>	<i>Analyte</i>	<i>QC Result</i>		<i>Low</i>	<i>High</i>
5035A/8260B	4-Bromofluorobenzene (Surr)	%R:	104.7	86	117
5035A/8260B	d8-Toluene (Surr)	%R:	97.6	90	110
5035A/8260B	Dibromofluoromethane (Surr)	%R:	99	77	120



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### Analytical Report

**Client:** EAGLE ENVIRONMENTAL CONSULTANTS **Date Collected:** 03/12/18  
**Project ID:** Reliable Stoves - 118102 **Time Collected:** 10:30  
**Sample ID:** EA-9 (1-3) **Date Received:** 03/13/18  
**Sample No:** 18-1225-011 **Date Reported:** 03/20/18

Results are reported on a dry weight basis.

Analyte	Result	R.L.	Units	Flags
<b>Solids, Total</b>		<b>Method: 2540B</b>		
Analysis Date: 03/14/18 14:00				
Total Solids	95.71		%	
<b>BTEX Organic Compounds</b>		<b>Method: 5035A/8260B</b>		
Analysis Date: 03/16/18				
Benzene	< 5.0	5.0	ug/kg	
Ethylbenzene	< 5.0	5.0	ug/kg	
Methyl-tert-butylether (MTBE)	< 5.0	5.0	ug/kg	
Toluene	< 5.0	5.0	ug/kg	
Xylene, Total	< 5.0	5.0	ug/kg	

<b>Sample QC Summary:</b>		<b>Surrogate Recovery</b>		<b>%R Limits</b>	
<i>Method</i>	<i>Analyte</i>	<i>QC Result</i>		<i>Low</i>	<i>High</i>
5035A/8260B	4-Bromofluorobenzene (Surr)	%R:	105.1	86 - 117	
5035A/8260B	d8-Toluene (Surr)	%R:	100	90 - 110	
5035A/8260B	Dibromofluoromethane (Surr)	%R:	100.4	77 - 120	



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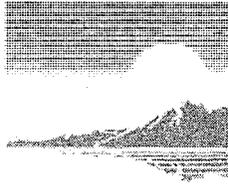
### Analytical Report

<b>Client:</b>	EAGLE ENVIRONMENTAL CONSULTANTS	<b>Date Collected:</b>	03/12/18
<b>Project ID:</b>	Reliable Stoves - 118102	<b>Time Collected:</b>	10:35
<b>Sample ID:</b>	EA-9 (5-7)	<b>Date Received:</b>	03/13/18
<b>Sample No:</b>	18-1225-012	<b>Date Reported:</b>	03/20/18

Results are reported on a dry weight basis.

Analyte	Result	R.L.	Units	Flags
<b>Solids, Total</b>		<b>Method: 2540B</b>		
Analysis Date: 03/14/18 14:00				
Total Solids	86.24		%	
<b>BTEX Organic Compounds</b>		<b>Method: 5035A/8260B</b>		
Analysis Date: 03/16/18				
Benzene	< 5.0	5.0	ug/kg	
Ethylbenzene	< 5.0	5.0	ug/kg	
Methyl-tert-butylether (MTBE)	< 5.0	5.0	ug/kg	
Toluene	< 5.0	5.0	ug/kg	
Xylene, Total	< 5.0	5.0	ug/kg	

<i>Sample QC Summary:</i>		<i>Surrogate Recovery</i>		<i>%R Limits</i>	
<i>Method</i>	<i>Analyte</i>	<i>QC Result</i>		<i>Low</i>	<i>High</i>
5035A/8260B	4-Bromofluorobenzene (Surr)	%R:	105.6	86 - 117	
5035A/8260B	d8-Toluene (Surr)	%R:	100.7	90 - 110	
5035A/8260B	Dibromofluoromethane (Surr)	%R:	107.3	77 - 120	



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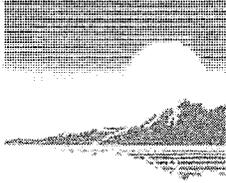
### Analytical Report

**Client:** EAGLE ENVIRONMENTAL CONSULTANTS **Date Collected:** 03/12/18  
**Project ID:** Reliable Stoves - 118102 **Time Collected:** 10:50  
**Sample ID:** EA-10 (1-3) **Date Received:** 03/13/18  
**Sample No:** 18-1225-013 **Date Reported:** 03/20/18

Results are reported on a dry weight basis.

Analyte	Result	R.L.	Units	Flags
<b>Solids, Total</b>		<b>Method: 2540B</b>		
Analysis Date: 03/14/18 14:00				
Total Solids	96.63		%	
<b>BTEX Organic Compounds</b>		<b>Method: 5035A/8260B</b>		
Analysis Date: 03/16/18				
Benzene	< 5.0	5.0	ug/kg	
Ethylbenzene	< 5.0	5.0	ug/kg	
Methyl-tert-butylether (MTBE)	< 5.0	5.0	ug/kg	
Toluene	< 5.0	5.0	ug/kg	
Xylene, Total	11.7	5.0	ug/kg	

<b>Sample QC Summary:</b>		<b>Surrogate Recovery</b>		<b>%R Limits</b>	
<i>Method</i>	<i>Analyte</i>	<i>QC Result</i>	<i>Low</i>	<i>High</i>	
5035A/8260B	4-Bromofluorobenzene (Surr)	%R: 104.6	86	117	
5035A/8260B	d8-Toluene (Surr)	%R: 100.3	90	110	
5035A/8260B	Dibromofluoromethane (Surr)	%R: 100.4	77	120	



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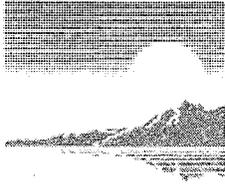
### Analytical Report

**Client:** EAGLE ENVIRONMENTAL CONSULTANTS **Date Collected:** 03/12/18  
**Project ID:** Reliable Stoves - 118102 **Time Collected:** 10:55  
**Sample ID:** EA-10 (5-7) **Date Received:** 03/13/18  
**Sample No:** 18-1225-014 **Date Reported:** 03/20/18

Results are reported on a dry weight basis.

Analyte	Result	R.L.	Units	Flags
<b>Solids, Total</b>		<b>Method: 2540B</b>		
Analysis Date: 03/14/18 14:00				
Total Solids	91.87		%	
<b>BTEX Organic Compounds</b>		<b>Method: 5035A/8260B</b>		
Analysis Date: 03/16/18				
Benzene	< 5.0	5.0	ug/kg	
Ethylbenzene	< 5.0	5.0	ug/kg	
Methyl-tert-butylether (MTBE)	< 5.0	5.0	ug/kg	
Toluene	< 5.0	5.0	ug/kg	
Xylene, Total	13.1	5.0	ug/kg	

<i>Sample QC Summary:</i>		<i>Surrogate Recovery</i>		<i>%R Limits</i>	
<i>Method</i>	<i>Analyte</i>	<i>QC Result</i>		<i>Low</i>	<i>High</i>
5035A/8260B	4-Bromofluorobenzene (Surr)	%R:	106.6	86	117
5035A/8260B	d8-Toluene (Surr)	%R:	101	90	110
5035A/8260B	Dibromofluoromethane (Surr)	%R:	101.3	77	120



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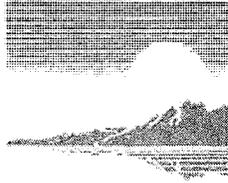
### Analytical Report

<b>Client:</b>	EAGLE ENVIRONMENTAL CONSULTANTS	<b>Date Collected:</b>	03/12/18
<b>Project ID:</b>	Reliable Stoves - 118102	<b>Time Collected:</b>	11:10
<b>Sample ID:</b>	EA-11 (3-5)	<b>Date Received:</b>	03/13/18
<b>Sample No:</b>	18-1225-015	<b>Date Reported:</b>	03/20/18

Results are reported on a dry weight basis.

Analyte	Result	R.L.	Units	Flags
<b>Solids, Total</b>		<b>Method: 2540B</b>		
Analysis Date: 03/14/18 14:00				
Total Solids	79.18		%	
<b>BTEX Organic Compounds</b>		<b>Method: 5035A/8260B</b>		
Analysis Date: 03/16/18				
Benzene	653	5.0	ug/kg	
Ethylbenzene	700	5.0	ug/kg	
Methyl-tert-butylether (MTBE)	< 320	5.0	ug/kg	
Toluene	< 500	5.0	ug/kg	
Xylene, Total	< 500	5.0	ug/kg	

<i>Sample QC Summary:</i>		<i>Surrogate Recovery</i>		<i>%R Limits</i>	
<i>Method</i>	<i>Analyte</i>	<i>QC Result</i>	<i>Low</i>	<i>High</i>	
5035A/8260B	4-Bromofluorobenzene (Surr)	%R: 102	86	117	
5035A/8260B	d8-Toluene (Surr)	%R: 97	90	110	
5035A/8260B	Dibromofluoromethane (Surr)	%R: 87.5	77	120	



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**Client:** EAGLE ENVIRONMENTAL CONSULTANTS  
**Project ID:** Reliable Stoves - 118102  
**Sample ID:** EA-11 (7-8)  
**Sample No:** 18-1225-016

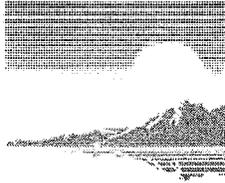
**Date Collected:** 03/12/18  
**Time Collected:** 11:15  
**Date Received:** 03/13/18  
**Date Reported:** 03/20/18

Results are reported on a dry weight basis.

Analyte	Result	R.L.	Units	Flags
<b>Solids, Total</b>		<b>Method: 2540B</b>		
Analysis Date: 03/14/18 14:00				
Total Solids	82.14		%	
<b>BTEX Organic Compounds</b>		<b>Method: 5035A/8260B</b>		
Analysis Date: 03/16/18				
Benzene	479	5.0	ug/kg	
Ethylbenzene	551	5.0	ug/kg	
Methyl-tert-butylether (MTBE)	< 320	5.0	ug/kg	
Toluene	< 500	5.0	ug/kg	
Xylene, Total	< 500	5.0	ug/kg	

**Sample QC Summary: Surrogate Recovery**

Method	Analyte	QC Result	%R Limits	
			Low	High
5035A/8260B	4-Bromofluorobenzene (Surr)	%R: 106.4	86	117
5035A/8260B	d8-Toluene (Surr)	%R: 97.2	90	110
5035A/8260B	Dibromofluoromethane (Surr)	%R: 92	77	120



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**Analytical Report**

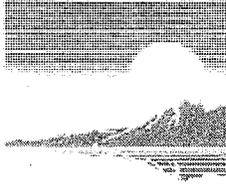
**Client:** EAGLE ENVIRONMENTAL CONSULTANTS  
**Project ID:** Reliable Stoves - 118102  
**Sample ID:** EA-12 (3-5)  
**Sample No:** 18-1225-017

**Date Collected:** 03/12/18  
**Time Collected:** 11:30  
**Date Received:** 03/13/18  
**Date Reported:** 03/20/18

Results are reported on a dry weight basis.

Analyte	Result	R.L.	Units	Flags
<b>Solids, Total</b>		<b>Method: 2540B</b>		
Analysis Date: 03/14/18 14:00				
Total Solids	88.24		%	
<b>BTEX Organic Compounds</b>		<b>Method: 5035A/8260B</b>		
Analysis Date: 03/16/18				
Benzene	< 5.0	5.0	ug/kg	
Ethylbenzene	< 5.0	5.0	ug/kg	
Methyl-tert-butylether (MTBE)	< 5.0	5.0	ug/kg	
Toluene	< 5.0	5.0	ug/kg	
Xylene, Total	< 5.0	5.0	ug/kg	

<b>Sample QC Summary:</b>		<b>Surrogate Recovery</b>		<b>%R Limits</b>	
<i>Method</i>	<i>Analyte</i>	<i>QC Result</i>	<i>Low</i>	<i>High</i>	
5035A/8260B	4-Bromofluorobenzene (Surr)	%R: 105.3	86	117	
5035A/8260B	d8-Toluene (Surr)	%R: 99.2	90	110	
5035A/8260B	Dibromofluoromethane (Surr)	%R: 93.9	77	120	



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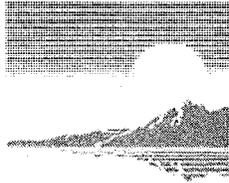
### Analytical Report

<b>Client:</b>	EAGLE ENVIRONMENTAL CONSULTANTS	<b>Date Collected:</b>	03/12/18
<b>Project ID:</b>	Reliable Stoves - 118102	<b>Time Collected:</b>	11:35
<b>Sample ID:</b>	EA-12 (5-7)	<b>Date Received:</b>	03/13/18
<b>Sample No:</b>	18-1225-018	<b>Date Reported:</b>	03/20/18

Results are reported on a dry weight basis.

Analyte	Result	R.L.	Units	Flags
<b>Solids, Total</b>		<b>Method: 2540B</b>		
Analysis Date: 03/14/18 14:00				
Total Solids	83.93		%	
<b>BTEX Organic Compounds</b>		<b>Method: 5035A/8260B</b>		
Analysis Date: 03/16/18				
Benzene	32.6	5.0	ug/kg	
Ethylbenzene	< 5.0	5.0	ug/kg	
Methyl-tert-butylether (MTBE)	< 5.0	5.0	ug/kg	
Toluene	8.8	5.0	ug/kg	
Xylene, Total	22.3	5.0	ug/kg	

<i>Sample QC Summary:</i>		<i>Surrogate Recovery</i>		<i>%R Limits</i>	
<i>Method</i>	<i>Analyte</i>	<i>QC Result</i>	<i>Low</i>	<i>High</i>	
5035A/8260B	4-Bromofluorobenzene (Surr)	%R: 107.2	86	117	
5035A/8260B	d8-Toluene (Surr)	%R: 101.2	90	110	
5035A/8260B	Dibromofluoromethane (Surr)	%R: 100	77	120	



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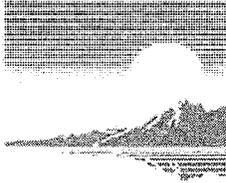
**Analytical Report**

**Client:** EAGLE ENVIRONMENTAL CONSULTANTS **Date Collected:** 03/12/18  
**Project ID:** Reliable Stoves - 118102 **Time Collected:** 11:50  
**Sample ID:** EA-13 (3-5) **Date Received:** 03/13/18  
**Sample No:** 18-1225-019 **Date Reported:** 03/20/18

Results are reported on a dry weight basis.

Analyte	Result	R.L.	Units	Flags
<b>Solids, Total</b>		<b>Method: 2540B</b>		
Analysis Date: 03/14/18 14:00				
Total Solids	81.52		%	
<b>BTEX Organic Compounds</b>		<b>Method: 5035A/8260B</b>		
Analysis Date: 03/16/18				
Benzene	< 5.0	5.0	ug/kg	
Ethylbenzene	< 5.0	5.0	ug/kg	
Methyl-tert-butylether (MTBE)	< 5.0	5.0	ug/kg	
Toluene	< 5.0	5.0	ug/kg	
Xylene, Total	< 5.0	5.0	ug/kg	

<b>Sample QC Summary: Surrogate Recovery</b>				<b>%R Limits</b>	
<i>Method</i>	<i>Analyte</i>	<i>QC Result</i>		<i>Low</i>	<i>High</i>
5035A/8260B	4-Bromofluorobenzene (Surr)	%R:	104.8	86	117
5035A/8260B	d8-Toluene (Surr)	%R:	99.5	90	110
5035A/8260B	Dibromofluoromethane (Surr)	%R:	96.1	77	120



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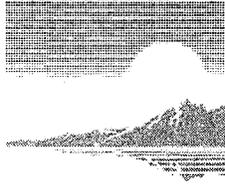
### Analytical Report

**Client:** EAGLE ENVIRONMENTAL CONSULTANTS **Date Collected:** 03/12/18  
**Project ID:** Reliable Stoves - 118102 **Time Collected:** 11:55  
**Sample ID:** EA-13 (5-7) **Date Received:** 03/13/18  
**Sample No:** 18-1225-020 **Date Reported:** 03/20/18

Results are reported on a dry weight basis.

Analyte	Result	R.L.	Units	Flags
<b>Solids, Total</b>		<b>Method: 2540B</b>		
Analysis Date: 03/14/18 14:00				
Total Solids	82.78		%	
<b>BTEX Organic Compounds</b>		<b>Method: 5035A/8260B</b>		
Analysis Date: 03/16/18				
Benzene	99.1	5.0	ug/kg	
Ethylbenzene	< 500	5.0	ug/kg	
Methyl-tert-butylether (MTBE)	< 320	5.0	ug/kg	
Toluene	< 500	5.0	ug/kg	
Xylene, Total	< 500	5.0	ug/kg	

<b>Sample QC Summary:</b>		<b>Surrogate Recovery</b>		<b>%R Limits</b>	
<i>Method</i>	<i>Analyte</i>	<i>QC Result</i>	<i>Low</i>	<i>High</i>	
5035A/8260B	4-Bromofluorobenzene (Surr)	%R: 104	86	117	
5035A/8260B	d8-Toluene (Surr)	%R: 94.9	90	110	
5035A/8260B	Dibromofluoromethane (Surr)	%R: 87.1	77	120	



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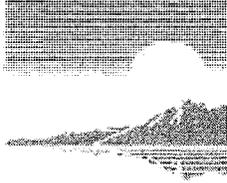
### Analytical Report

**Client:** EAGLE ENVIRONMENTAL CONSULTANTS **Date Collected:** 03/12/18  
**Project ID:** Reliable Stoves - 118102 **Time Collected:** 12:10  
**Sample ID:** EA-14 (1-3) **Date Received:** 03/13/18  
**Sample No:** 18-1225-021 **Date Reported:** 03/20/18

Results are reported on a dry weight basis.

Analyte	Result	R.L.	Units	Flags
<b>Solids, Total</b> <span style="float: right;"><b>Method: 2540B</b></span>				
Analysis Date: 03/14/18 14:00				
Total Solids	94.63		%	
<b>BTEX Organic Compounds</b> <span style="float: right;"><b>Method: 5035A/8260B</b></span>				
Analysis Date: 03/16/18				
Benzene	< 5.0	5.0	ug/kg	
Ethylbenzene	< 5.0	5.0	ug/kg	
Methyl-tert-butylether (MTBE)	< 5.0	5.0	ug/kg	
Toluene	< 5.0	5.0	ug/kg	
Xylene, Total	< 5.0	5.0	ug/kg	

<i>Sample QC Summary:</i>		<i>Surrogate Recovery</i>		<i>%R Limits</i>	
<i>Method</i>	<i>Analyte</i>	<i>QC Result</i>	<i>Low</i>	<i>High</i>	
5035A/8260B	4-Bromofluorobenzene (Surr)	%R: 106.4	86	117	
5035A/8260B	d8-Toluene (Surr)	%R: 99.9	90	110	
5035A/8260B	Dibromofluoromethane (Surr)	%R: 100.6	77	120	



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### Analytical Report

**Client:** EAGLE ENVIRONMENTAL CONSULTANTS  
**Project ID:** Reliable Stoves - 118102  
**Sample ID:** EA-14 (5-7)  
**Sample No:** 18-1225-022

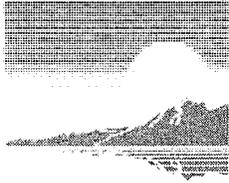
**Date Collected:** 03/12/18  
**Time Collected:** 12:15  
**Date Received:** 03/13/18  
**Date Reported:** 03/20/18

Results are reported on a dry weight basis.

Analyte	Result	R.L.	Units	Flags
<b>Solids, Total</b>		<b>Method: 2540B</b>		
Analysis Date: 03/14/18 14:00				
Total Solids	95.89		%	
<b>BTEX Organic Compounds</b>		<b>Method: 5035A/8260B</b>		
Analysis Date: 03/16/18				
Benzene	< 5.0	5.0	ug/kg	
Ethylbenzene	< 5.0	5.0	ug/kg	
Methyl-tert-butylether (MTBE)	< 5.0	5.0	ug/kg	
Toluene	< 5.0	5.0	ug/kg	
Xylene, Total	< 5.0	5.0	ug/kg	

**Sample QC Summary: Surrogate Recovery**

Method	Analyte	QC Result	%R Limits	
			Low	High
5035A/8260B	4-Bromofluorobenzene (Surr)	%R: 106.6	86	117
5035A/8260B	d8-Toluene (Surr)	%R: 101.1	90	110
5035A/8260B	Dibromofluoromethane (Surr)	%R: 101.9	77	120



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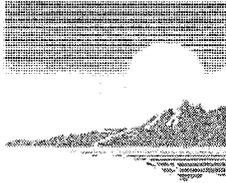
### Analytical Report

<b>Client:</b>	EAGLE ENVIRONMENTAL CONSULTANTS	<b>Date Collected:</b>	03/12/18
<b>Project ID:</b>	Reliable Stoves - 118102	<b>Time Collected:</b>	12:30
<b>Sample ID:</b>	EA-15 (1-3)	<b>Date Received:</b>	03/13/18
<b>Sample No:</b>	18-1225-023	<b>Date Reported:</b>	03/20/18

Results are reported on a dry weight basis.

Analyte	Result	R.L.	Units	Flags
<b>Solids, Total</b>		<b>Method: 2540B</b>		
Analysis Date: 03/14/18 14:00				
Total Solids	96.69		%	
<b>BTEX Organic Compounds</b>		<b>Method: 5035A/8260B</b>		
Analysis Date: 03/16/18				
Benzene	< 5.0	5.0	ug/kg	
Ethylbenzene	< 5.0	5.0	ug/kg	
Methyl-tert-butylether (MTBE)	< 5.0	5.0	ug/kg	
Toluene	< 5.0	5.0	ug/kg	
Xylene, Total	< 5.0	5.0	ug/kg	

<b>Sample QC Summary:</b>		<b>Surrogate Recovery</b>		<b>%R Limits</b>	
<i>Method</i>	<i>Analyte</i>	<i>QC Result</i>		<i>Low</i>	<i>High</i>
5035A/8260B	4-Bromofluorobenzene (Surr)	%R:	105.8	86	117
5035A/8260B	d8-Toluene (Surr)	%R:	100.9	90	110
5035A/8260B	Dibromofluoromethane (Surr)	%R:	104	77	120



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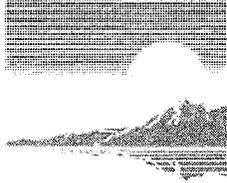
### Analytical Report

<b>Client:</b>	EAGLE ENVIRONMENTAL CONSULTANTS	<b>Date Collected:</b>	03/12/18
<b>Project ID:</b>	Reliable Stoves - 118102	<b>Time Collected:</b>	12:35
<b>Sample ID:</b>	EA-15 (5-6)	<b>Date Received:</b>	03/13/18
<b>Sample No:</b>	18-1225-024	<b>Date Reported:</b>	03/20/18

Results are reported on a dry weight basis.

Analyte	Result	R.L.	Units	Flags
<b>Solids, Total</b>		<b>Method: 2540B</b>		
Analysis Date: 03/14/18 14:00				
Total Solids	81.07		%	
<b>BTEX Organic Compounds</b>		<b>Method: 5035A/8260B</b>		
Analysis Date: 03/16/18				
Benzene	< 5.0	5.0	ug/kg	
Ethylbenzene	< 5.0	5.0	ug/kg	
Methyl-tert-butylether (MTBE)	< 5.0	5.0	ug/kg	
Toluene	< 5.0	5.0	ug/kg	
Xylene, Total	< 5.0	5.0	ug/kg	

<i>Sample QC Summary:</i>		<i>Surrogate Recovery</i>		<i>%R Limits</i>	
<i>Method</i>	<i>Analyte</i>	<i>QC Result</i>		<i>Low</i>	<i>High</i>
5035A/8260B	4-Bromofluorobenzene (Surr)	%R:	106.8	86 - 117	
5035A/8260B	d8-Toluene (Surr)	%R:	98.3	90 - 110	
5035A/8260B	Dibromofluoromethane (Surr)	%R:	94.9	77 - 120	



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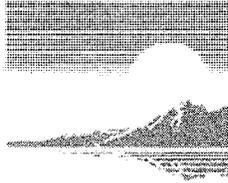
### Analytical Report

**Client:** EAGLE ENVIRONMENTAL CONSULTANTS **Date Collected:** 03/12/18  
**Project ID:** Reliable Stoves - 118102 **Time Collected:** 12:50  
**Sample ID:** EA-16 (3-5) **Date Received:** 03/13/18  
**Sample No:** 18-1225-025 **Date Reported:** 03/20/18

Results are reported on a dry weight basis.

Analyte	Result	R.L.	Units	Flags
<b>Solids, Total</b>		<b>Method: 2540B</b>		
Analysis Date: 03/14/18 14:00				
Total Solids	74.53		%	
<b>BTEX Organic Compounds</b>		<b>Method: 5035A/8260B</b>		
Analysis Date: 03/16/18				
Benzene	< 5.0	5.0	ug/kg	
Ethylbenzene	< 5.0	5.0	ug/kg	
Methyl-tert-butylether (MTBE)	< 5.0	5.0	ug/kg	
Toluene	< 5.0	5.0	ug/kg	
Xylene, Total	< 5.0	5.0	ug/kg	

<i>Sample QC Summary:</i>		<i>Surrogate Recovery</i>		<i>%R Limits</i>	
<i>Method</i>	<i>Analyte</i>	<i>QC Result</i>	<i>Low</i>	<i>High</i>	
5035A/8260B	4-Bromofluorobenzene (Surr)	%R: 105.6	86	117	
5035A/8260B	d8-Toluene (Surr)	%R: 101.2	90	110	
5035A/8260B	Dibromofluoromethane (Surr)	%R: 102.4	77	120	



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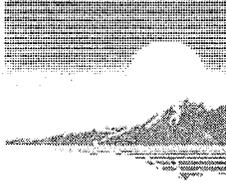
### Analytical Report

<b>Client:</b>	EAGLE ENVIRONMENTAL CONSULTANTS	<b>Date Collected:</b>	03/12/18
<b>Project ID:</b>	Reliable Stoves - 118102	<b>Time Collected:</b>	12:55
<b>Sample ID:</b>	EA-16 (5-6)	<b>Date Received:</b>	03/13/18
<b>Sample No:</b>	18-1225-026	<b>Date Reported:</b>	03/20/18

Results are reported on a dry weight basis.

Analyte	Result	R.L.	Units	Flags
<b>Solids, Total</b>		<b>Method: 2540B</b>		
Analysis Date: 03/14/18 14:00				
Total Solids	85.25		%	
<b>BTEX Organic Compounds</b>		<b>Method: 5035A/8260B</b>		
Analysis Date: 03/16/18				
Benzene	< 5.0	5.0	ug/kg	
Ethylbenzene	< 5.0	5.0	ug/kg	
Methyl-tert-butylether (MTBE)	< 5.0	5.0	ug/kg	
Toluene	< 5.0	5.0	ug/kg	
Xylene, Total	< 5.0	5.0	ug/kg	

<i>Sample QC Summary:</i>		<i>Surrogate Recovery</i>		<i>%R Limits</i>	
<i>Method</i>	<i>Analyte</i>	<i>QC Result</i>	<i>Low</i>	<i>High</i>	
5035A/8260B	4-Bromofluorobenzene (Surr)	%R: 103.9	86	117	
5035A/8260B	d8-Toluene (Surr)	%R: 100.3	90	110	
5035A/8260B	Dibromofluoromethane (Surr)	%R: 100.9	77	120	



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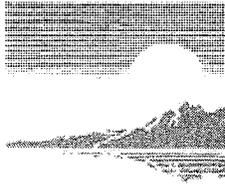
### Analytical Report

<b>Client:</b>	EAGLE ENVIRONMENTAL CONSULTANTS	<b>Date Collected:</b>	03/12/18
<b>Project ID:</b>	Reliable Stoves - 118102	<b>Time Collected:</b>	13:10
<b>Sample ID:</b>	EA-17 (1-3)	<b>Date Received:</b>	03/13/18
<b>Sample No:</b>	18-1225-027	<b>Date Reported:</b>	03/20/18

Results are reported on a dry weight basis.

Analyte	Result	R.L.	Units	Flags
<b>Solids, Total</b>		<b>Method: 2540B</b>		
Analysis Date: 03/14/18 14:00				
Total Solids	77.49		%	
<b>BTEX Organic Compounds</b>		<b>Method: 5035A/8260B</b>		
Analysis Date: 03/16/18				
Benzene	< 5.0	5.0	ug/kg	
Ethylbenzene	< 5.0	5.0	ug/kg	
Methyl-tert-butylether (MTBE)	< 5.0	5.0	ug/kg	
Toluene	< 5.0	5.0	ug/kg	
Xylene, Total	< 5.0	5.0	ug/kg	

<i>Sample QC Summary:</i>		<i>Surrogate Recovery</i>		<i>%R Limits</i>	
<i>Method</i>	<i>Analyte</i>	<i>QC Result</i>		<i>Low</i>	<i>High</i>
5035A/8260B	4-Bromofluorobenzene (Surr)	%R:	105.4	86	117
5035A/8260B	d8-Toluene (Surr)	%R:	100.7	90	110
5035A/8260B	Dibromofluoromethane (Surr)	%R:	103.7	77	120



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### Analytical Report

**Client:** EAGLE ENVIRONMENTAL CONSULTANTS  
**Project ID:** Reliable Stoves - 118102  
**Sample ID:** EA-17 (5-7)  
**Sample No:** 18-1225-028

**Date Collected:** 03/12/18  
**Time Collected:** 13:15  
**Date Received:** 03/13/18  
**Date Reported:** 03/20/18

Results are reported on a dry weight basis.

Analyte	Result	R.L.	Units	Flags
<b>Solids, Total</b>		<b>Method: 2540B</b>		
Analysis Date: 03/14/18 14:00				
Total Solids	83.47		%	
<b>BTEX Organic Compounds</b>		<b>Method: 5035A/8260B</b>		
Analysis Date: 03/16/18				
Benzene	< 5.0	5.0	ug/kg	
Ethylbenzene	< 5.0	5.0	ug/kg	
Methyl-tert-butylether (MTBE)	< 5.0	5.0	ug/kg	
Toluene	< 5.0	5.0	ug/kg	
Xylene, Total	< 5.0	5.0	ug/kg	

<i>Sample QC Summary:</i>		<i>Surrogate Recovery</i>		<i>%R Limits</i>	
<i>Method</i>	<i>Analyte</i>	<i>QC Result</i>	<i>Low</i>	<i>High</i>	
5035A/8260B	4-Bromofluorobenzene (Surr)	%R: 105.2	86	117	
5035A/8260B	d8-Toluene (Surr)	%R: 99.7	90	110	
5035A/8260B	Dibromofluoromethane (Surr)	%R: 98.5	77	120	



**First Environmental Laboratories**  
 1600 Shore Road, Suite D  
 Naperville, Illinois 60563  
 Phone: (630) 778-1200 • Fax: (630) 778-1233  
 E-mail: firstinfo@firstenv.com • www.firstenv.com  
 IEPA Certification #100292

Company Name: Eagle Environmental Consultants LLC  
 Street Address: 3805 Illinois Ave  
 City: St. Charles State: IL Zip: 60174  
 Phone: on file e-mail: on file  
 Send Report To: Tahseen Gureshi  
 Sampled By: Kwil + Dahl

**Analyses**

Project I.D.: Reliable Stores  
 P.O. #: 118102

Matrix Codes: S = Soil W = Water O = Other

Date/Time Taken	Sample Description	Matrix	BYEX/MTDE	Hold - Do Not Analyze	Comments	Lab I.D.
3/12/2018 0900	EA-4 (3-5)	S	X			18-1225-001
	0905 EA-4 (5-7)	S	X			002
	0915 EA-5 (3-5)	S	X			003
	0920 EA-5 (5-7)	S	X			004
	0930 EA-6 (3-5)	S	X			005
	0935 EA-6 (5-7)	S	X			006
	0945 EA-7 (3-5)	S	X			007
	0950 EA-7 (5-7)	S	X			008
	1010 EA-8 (1-3)	S	X			009
	1015 EA-8 (5-7)	S	X			010
	1030 EA-9 (1-3)	S	X			011
	1035 EA-9 (5-7)	S	X			012

**FOR LAB USE ONLY:**

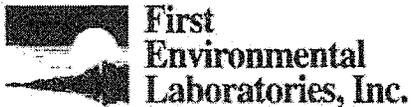
Cooler Temperature: 0.1-6°C Yes \_\_\_ No \_\_\_ °C Sample Refrigerated: Yes  No \_\_\_  
 Received within 6 hrs. of collection: \_\_\_\_\_ Refrigerator Temperature: \_\_\_\_\_ °C  
 Ice Present: Yes \_\_\_ No \_\_\_ 5035 Vials Frozen: Yes \_\_\_ No \_\_\_  
 Freezer Temperature: \_\_\_\_\_ °C  
 Program:  TACO/SRP  CCDD  NPDES  LUST  SDWA

Notes and Special Instructions: \_\_\_\_\_

Relinquished By: Alin Dahl Date/Time: 3/13/18 11:10 Received By: Ven G... Date/Time: 3/13/18 11:10  
 Relinquished By: \_\_\_\_\_ Date/Time: \_\_\_\_\_ Received By: \_\_\_\_\_ Date/Time: \_\_\_\_\_

R74

**CHAIN OF CUSTODY RECORD**



**First Environmental Laboratories**  
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 Naperville, Illinois 60563  
 Phone: (630) 778-1200 • Fax: (630) 778-1233  
 E-mail: firstinfo@firstenv.com • www.firstenv.com  
 IEPA Certification #100292

Company Name: Eagle Environmental Consultants, LLC  
 Street Address: 3805 Illinois Ave.  
 City: St Charles State: IL Zip: 60174  
 Phone: on file e-mail: on file  
 Send Report To: Yahseem Qureshi  
 Sampled By: Kwil & Dahl

**Analyses**

Project I.D.: Reliable Stores  
 P.O. #: 118102

Matrix Codes: S = Soil W = Water O = Other

Date/Time Taken	Sample Description	Matrix	Analyses							Comments	Lab I.D.
3/12/2018 1050	EA-10 (1-3)	S	X								18-1225-013
1055	EA-10 (5-7)	S	X								014
1110	EA-11 (3-5)	S	X								015
1115	EA-11 (7-8)	S	X								016
1130	EA-12 (3-5)	S	X								017
1135	EA-12 (5-7)	S	X								018
1150	EA-13 (3-5)	S	X								019
1155	EA-13 (5-7)	S	X								020
1210	EA-14 (1-3)	S	X								021
1215	EA-14 (5-7)	S	X								022
1230	EA-15 (1-3)	S	X								023
1235	EA-15 (5-6)	S	X								024

**FOR LAB USE ONLY:**

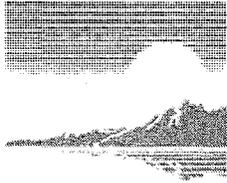
Cooler Temperature: 0.1-6°C Yes \_\_\_ No \_\_\_ °C Sample Refrigerated: Yes  No \_\_\_  
 Received within 6 hrs. of collection: \_\_\_\_\_ Refrigerator Temperature: \_\_\_\_\_ °C Program:  TACO/SRP  CCDD  NPDES  LUST  SDWA  
 Ice Present: Yes \_\_\_ No \_\_\_ 5035 Vials Frozen: Yes \_\_\_ No \_\_\_  
 Freezer Temperature: \_\_\_\_\_ °C

Notes and Special Instructions: \_\_\_\_\_

Relinquished By: Alan Dahl Date/Time: 3/13/18 11:00 Received By: Ben Glatfelter Date/Time: 3/13/18 11:10  
 Relinquished By: \_\_\_\_\_ Date/Time: \_\_\_\_\_ Received By: \_\_\_\_\_ Date/Time: \_\_\_\_\_

1275





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### Quality Control Summary

Client: EAGLE ENVIRONMENTAL CONSULTANTS

Lab File ID: 18-1225

Project ID: Reliable Stoves - 118102

QC Lab#	Time QC Code	Parameter	Reported Result	Units	QC Result	%R Limits		RPD Limit
						Low	High	
<b>Parameter:</b>	BTEX Organic Compounds	<b>Analytical Method:</b>	5035A/8260B		<b>Analytical WS #:</b>	166101	<b>Analysis Date:</b>	03/16/18
LCS457649	LCS	Benzene	56.0	ug/kg	%R: 112	75	118	
	LCS	Toluene	51.0	ug/kg	%R: 102	75	118	
LCSD457650	LCSD	Benzene	56.0	ug/kg	%R: 112	75	118	
	LCSD	Toluene	51.0	ug/kg	%R: 102	75	118	
Method Blank4576	BLK	Benzene	< 5.0	ug/kg	0	-		
	BLK	Ethylbenzene	< 5.0	ug/kg	0	-		
	BLK	Methyl-tert-butylether (MTBE)	< 5.0	ug/kg	0	-		
	BLK	Toluene	< 5.0	ug/kg	0	-		
	BLK	Xylene, Total	< 5.0	ug/kg	0	-		

\* The QC indicator is outside control limits. %R = percent recovery; RPD = Relative percent difference  
 CB = Calibration Blank; CCVS = Continuing Calibration Verification Standard; MS = Matrix Spike;  
 MSD = Matrix Spike Duplicate; LCS = Laboratory Control Spike; SURR = Surrogate Spiking Compound;  
 PB = Procedure Blank; BLK = Method Blank; D = QCI diluted out.





# Illinois Environmental Protection Agency

Bureau of Land • 1021 N. Grand Avenue E. • P.O. Box 19276 • Springfield • Illinois • 62794-9276

The Agency is authorized to require this information under Section 4 and Title XVI of the Environmental Protection Act (415 ILCS 5/4, 5/57 – 57.17). Failure to disclose this information may result in a civil penalty of not to exceed \$50,000.00 for the violation and an additional civil penalty of not to exceed \$10,000.00 for each day during which the violation continues (415 ILCS 5/42). Any person who knowingly makes a false material statement or representation, orally or in writing, in any label, manifest, record, report, permit, or license, or other document filed, maintained or used for the purpose of compliance with Title XVI commits a Class 4 felony. Any second or subsequent offense after conviction hereunder is a Class 3 felony (415 ILCS 5/44 and 57.17). This form has been approved by the Forms Management Center.

## Leaking Underground Storage Tank Program Laboratory Certification for Chemical Analysis

### A. Site Identification

IEMA Incident # (6- or 8-digit): 180158 IEPA LPC# (10-digit): 0311835047  
Site Name: Reliable Stores, Inc.  
Site Address (Not a P.O. Box): 905 West Roosevelt Road  
City: Maywood County: Cook ZIP Code: 60153

Leaking UST Technical File

### B. Sample Collector

I certify that:

1. Appropriate sampling equipment/methods were utilized to obtain representative samples.
2. Chain-of-custody procedures were followed in the field.
3. Sample integrity was maintained by proper preservation.
4. All samples were properly labeled.

AK/AD  
(Initial)  
AK/AD  
(Initial)  
AK/AD  
(Initial)  
AK/AD  
(Initial)

### C. Laboratory Representative

I certify that:

1. Proper chain-of-custody procedures were followed as documented on the chain-of-custody forms
2. Sample integrity was maintained by proper preservation.
3. All samples were properly labeled.
4. Quality assurance/quality control procedures were established and carried out.
5. Sample holding times were not exceeded.

SSU  
(Initial)  
SSU  
(Initial)  
SSU  
(Initial)  
SSU  
(Initial)  
SSU  
(Initial)

- 6. SW-846 Analytical Laboratory Procedure (USEPA) methods were used for the analyses.
- 7. An accredited lab performed quantitative analysis using test methods identified in 35 IAC 186.180 (for samples collected on or after January 1, 2003).

SSV  
(Initial)

SSV  
(Initial)

**D. Signatures**

I hereby affirm that all information contained in this form is true and accurate to the best of my knowledge and belief. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

**Sample Collector**

Name Kevin Kwil / Alison Dahl

Title Senior Project Manager / Geologist I

Company Eagle Environmental Consultants, LLC

Address 3805 Illinois Avenue

City Saint Charles

State Illinois

Zip Code 60174

Phone 630-940-2540

Signature *Kevin Kwil / Alison Dahl*

Date 3/12/18

**Laboratory Representative**

Name Bill Mottashed

Title Project Manager

Company First Environmental Laboratories, Inc.

Address 1600 Shore Road

City Naperville

State Illinois

Zip Code 60563

Phone 630-778-1200

Signature *Bill Mottashed FOR W144*

Date 3/20/18



[Return to the main IEMA website](#)

### Hazardous Materials Incident Report

**\*NOTE:** The following fields have been deleted or redacted from some of the reports contained in this database: Callback Phone, Number Injured, Number Killed, On Scene Contact Phone, Responsible Party Contact Person, Responsible Party Callback Phone.

Incident Number: H-2018-0158

Incident Report Date: 2/14/2018 3:45:31 PM

Street Address of Incident Location: 905 W Roosevelt

Incident Location City: Maywood

Incident Location County: Cook

Entered By: Kattner, Paul (IEMA)

Data Input Status: Closed

Leaking Underground Storage Tank (LUST)?: No

Caller: Vaarghese Vallikalam

Caller Represents: Reliabile Store Inc

Hazmat Incident Type: HAZMAT: Leak or spill

#### Incident Location

Date/Time Occurred:

Street: 905 W Roosevelt

City: Maywood

State:

County: Cook

Milepost: N/A

Section: N/A

Township: N/A

Range: N/A

Area Involved: Fixed Facility

Latitude: 41.86431

Longitude: -87.843593

Media or medium into which the release occurred: Ground

#### Weather Information

Temp: 41 Degrees

Wind: Calm

#### Materials Involved

Name: Gasoline

Type: Liquid

CHRIS CODE: Unknown

CAS#: Unknown

UN/NA #: Unknown

Is this a 302(a) Extremely Hazardous Substance?: Unknown

Is this a RCRA Hazardous Waste?: Unknown

Is this a RCRA regulated facility?: Unknown

Container Type: Under ground storage tank (Dispenser)

Container Size: Unknown

Amount Released: Unknown

Rate of Release/min: N/A

Duration of Release: At least 2 weeks.

Cause of Release: Loose nut in the dispenser resulted in a gasoline drip.

Estimated Spill Extent: Unknown

R81

Spill Extent Units:

Date/Time Incident Occurred:

Check if Unknown (Occurrence):

Date/Time Discovered:

Check if Unknown (Discovered):

Where Taken: N/A

On Scene Contact: Vaarghese Vallikalam

Proper safety precautions to take as a result of the release, including evacuation: None

Number of People Evacuated: 0

Assistance needed from State Agencies: None

Containment/cleanup actions and plans: North Branch (contractor) handled cleanup and remediation.

**Responsible Party**

Name: Relalable Store Inc

Facility Manager: Vaarghese Vallikalam

Facility Manager Phone #: 847/722-7598

Street: 905 W Roosevelt

**Emergency Units Contacted**

Contacted ESDA?:

ESDA on Scene?:

Specific ESDA Agency Contacted: None

Contacted Fire Department?:

Fire Department on Scene?:

Name of Fire Department Contacted: None

Contacted Police Department?:

Police Department on Scene?:

Name of Police Department Contacted: None

Sheriff Police Department?:

Sheriff Department on Scene?:

Name of Sheriff Department Contacted: None

Was an Agency Other than ESDA, Fire Police or Sheriff Contacted?:

Was this Other Agency On Scene?:

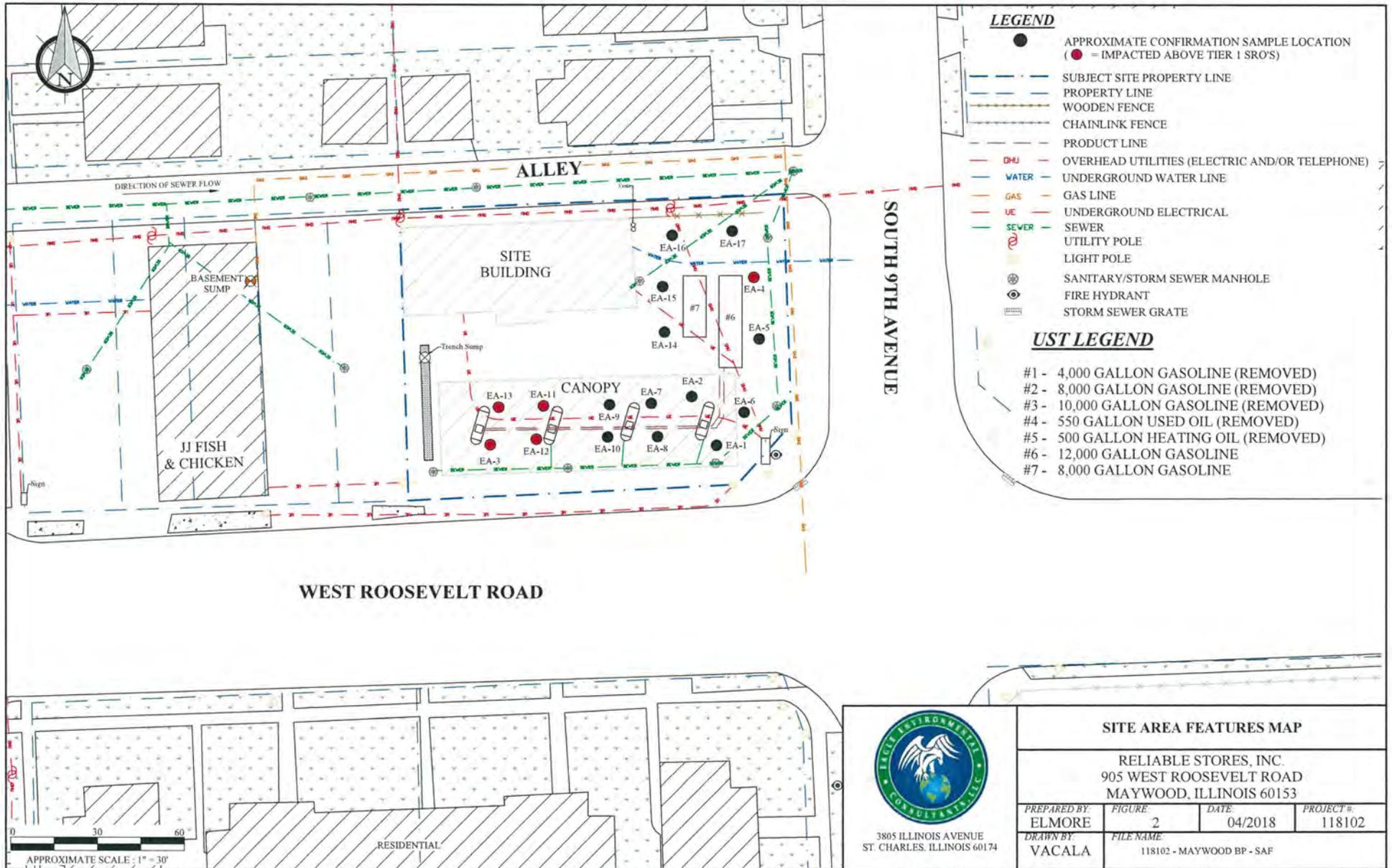
Name of Other Agency Contacted: None

**Agency or Persons Notified**

Agency	Date/Time	Name of Person	Notification Action
IEPA, OSFM, NRTP, & IEMA Region #4	2018-02-14 15:50	E-mailed	Report Sent

**Narrative**

R82



3805 ILLINOIS AVENUE  
ST. CHARLES, ILLINOIS 60174

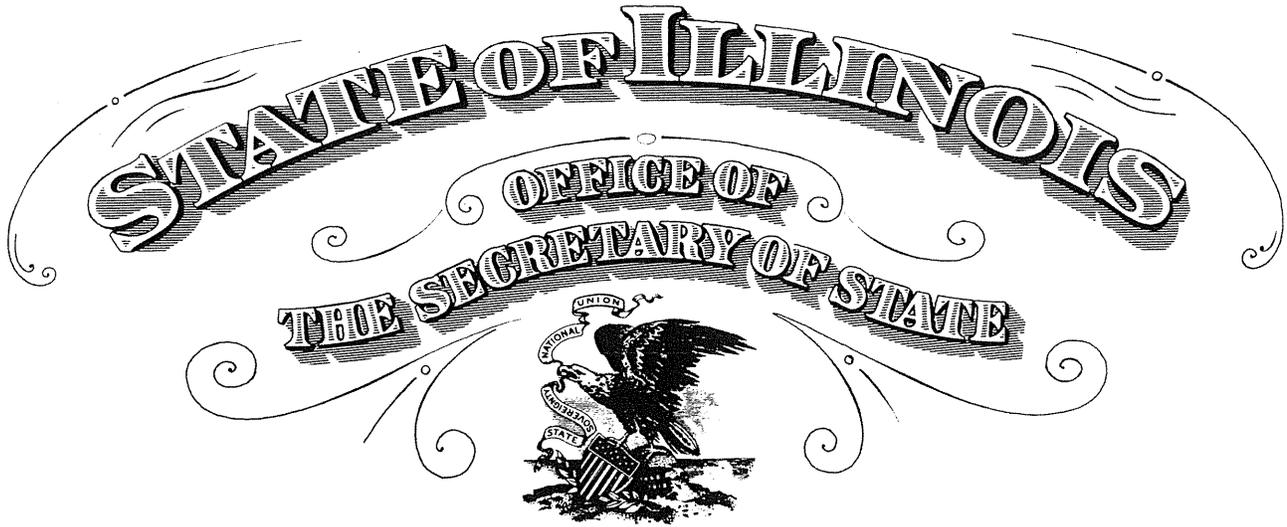
**SITE AREA FEATURES MAP**

RELIABLE STORES, INC.  
905 WEST ROOSEVELT ROAD  
MAYWOOD, ILLINOIS 60153

PREPARED BY: ELMORE	FIGURE: 2	DATE: 04/2018	PROJECT #: 118102
DRAWN BY: VACALA	FILE NAME: 118102 - MAYWOOD BP - SAF		

File Number

6791-775-8



**To all to whom these Presents Shall Come, Greeting:**

*I, Jesse White, Secretary of State of the State of Illinois, do hereby certify that I am the keeper of the records of the Department of Business Services. I certify that*

RELIABLE STORES INC., A DOMESTIC CORPORATION, INCORPORATED UNDER THE LAWS OF THIS STATE ON APRIL 15, 2011, APPEARS TO HAVE COMPLIED WITH ALL THE PROVISIONS OF THE BUSINESS CORPORATION ACT OF THIS STATE RELATING TO THE PAYMENT OF FRANCHISE TAXES, AND AS OF THIS DATE, IS IN GOOD STANDING AS A DOMESTIC CORPORATION IN THE STATE OF ILLINOIS.

***In Testimony Whereof, I hereto set my hand and cause to be affixed the Great Seal of the State of Illinois, this 3RD day of MAY A.D. 2018 .***



*Jesse White*

SECRETARY OF STATE

Bruce Rauner, Governor

Matt Perez, State Fire Marshal



Office of the State Fire Marshal

**AUTHORIZATION TO SUBMIT ELIGIBILITY AND DEDUCTIBLE APPLICATION**

The undersigned owner or operator for the underground storage tanks for facility number 2025658 located at 905 West Roosevelt Road, Maywood, IL 60153 ("this facility") certifies that:

- (1) Eagle Environmental Consultants, LLC, located at 3805 Illinois Avenue St. Charles, Il 60174  
(name of representative or consultant) (address of representative/consultant)

is fully authorized by the undersigned to submit an Eligibility and Deductible Application to the Office of the State Fire Marshal for IEMA incident number H2018-0158; and

- (2) that the undersigned owner or operator of this facility has authority to direct remediation at this facility and has directed the above representative or consultant to take all actions necessary to perfect the Eligibility and Deductible Application for this facility, including the submittal of any necessary additional information; and
- (3) that the undersigned is a corporate officer, managing member, managing partner, individual owner, or other employee or other representative of the owner/operator with full authority to direct submittals concerning the remediation in this matter and make these representations on behalf of the owner/operator.

**SIGNED:**

Under penalties for perjury as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct.

Owner/Operator Signature

Varghese Vallikalam  
Print Full Name of Person Signing

Owner  
Title (if not a sole proprietor)

5/3/18  
Date

svallikalam@gmail.com  
E-mail Address for Person Signing

R 85

BEFORE THE POLLUTION CONTROL BOARD  
OF THE STATE OF ILLINOIS

RELIABLE STORES, INC.,	)	
Petitioner,	)	
v.	)	PCB 2019-002
	)	(OSFM Appeal)
OFFICE OF THE STATE FIRE	)	
MARSHAL	)	
Respondent.	)	

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CHEMICAL SAFETY

NOTICE OF FILING AND PROOF OF SERVICE

To: Don Brown, Clerk	Division of Petroleum and Chemical Safety
Illinois Pollution Control Board	Office of the State Fire Marshal
100 West Randolph Street	1035 Stevenson Drive
State of Illinois Building, Suite 11-500	Springfield, IL 62703
Chicago, IL 60601	

PLEASE TAKE NOTICE that I have today electronically filed with the Office of the Clerk of the Illinois Pollution Control Board, pursuant to Board Procedural Rule 101.302, an AMENDED PETITION FOR REVIEW OF OSFM DETERMINATION, a copy of which is herewith served upon the above parties of record in this cause.

The undersigned hereby certifies that a true and correct copy of this Notice of Filing, together with a copy of the document described above, were today served Respondent by enclosing same in envelopes addressed as above with postage fully prepaid, and by depositing said envelopes in a U.S. Post Office Mailbox in Springfield, Illinois on the 27<sup>th</sup> day of August, 2018.

Respectfully submitted,

RELIABLE STORES, INC., Petitioner

BY: LAW OFFICE OF PATRICK D. SHAW

BY: /s/ Patrick D. Shaw

Patrick D. Shaw  
LAW OFFICE OF PATRICK D. SHAW  
80 Bellerive Road  
Springfield, IL 62704  
217-299-8484  
pdshaw1law@gmail.com

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

RELIABLE STORES, INC.,	)	
Petitioner,	)	
	)	
v.	)	PCB 2019-002
	)	(OSFM Appeal)
OFFICE OF THE STATE FIRE MARSHAL,	)	
Respondent.	)	

**AMENDED PETITION FOR REVIEW OF OSFM DETERMINATION**

NOW COMES Petitioner, RELIABLE STORES, INC. (hereinafter "RELIABLE"), pursuant to Section 57.9(c)(2) of the Illinois Environmental Protection Act, 415 ILCS 5/57.9(c)(2), and hereby appeals the UST determination dated July 2, 2018 by Respondent Office of the State Fire Marshal ( hereinafter "OSFM"), stating as follows:

1. RELIABLE owns or operates an active service station containing two gasoline underground storage tanks, which is located in Maywood, Cook County, Illinois, and assigned LPC#0311835047. Both of these tanks were first put into service and registered in 2004.

2. On February 14, 2018, the underground storage tanks experienced a release, which was assigned IEMA Incident No. 20180158.

3. The release was determined to be from an underground dispenser sump, which was cracked or improperly sealed, allowing gasoline to enter the environment.

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4. On May 9, 2018, an application for an eligibility and deductibility determination was submitted to OSFM.

5. On June 12, 2018, OSFM issued its eligibility and deductibility determination letter, finding that the tanks were ineligible. A true and correct copy of which is attached hereto

as Exhibit A.

6. On July 3, 2018, consultants petitioned the Board for review of the OSFM determination on behalf of RELIABLE, which was timely filed as acknowledged in the Board's July 26, 2018, order. The Board further gave RELIABLE until August 27, 2018 to file an amended petition for review, correcting the errors noted in said Board order, and therefore this amended petition is also timely filed.

7. By reason and belief, OSFM views the incident as resulting from one or more leaks in the above-ground dispenser. However, as explained herein, any such leaks would have been contained by the underground dispenser sump, but for the fact that it was leaking gasoline into the environment. And more importantly, as a matter of law, such containment discharges are releases from an underground storage tank system.

8. Pursuant to the Board's regulations, a "UST system" means "an underground storage tank, connected underground piping, underground ancillary equipment, and containment system, if any." (35 Ill. Adm. Code § 734.115 (emphasis added))

9. Pursuant to OSFM's regulations, "Under-dispenser Containment" means "factory manufactured containment underneath a dispenser that will prevent leaks from the dispenser from reaching soil or groundwater. The containment must be liquid-tight on its sides, bottom and at any penetrations . . . ." (41 Ill. Adm. Code § 174.100 (emphasis added); see also 40 CFR § 280.12 ("Under-dispenser containment or UDC means containment underneath a dispenser system designed to prevent leaks from the dispenser and piping within or above the UDC from reaching soil or groundwater." (emphasis added))

10. Pursuant to the description in OSFM regulations, the underground dispenser sump

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is a containment system. See also Harlem Township v. IEPA, PCB 92-83, slip op. at 5 (Oct. 16, 1992) (“A containment system holds or retains a substance.”) Therefore, the release from the underground dispenser sump is a release eligible for reimbursement from the Leaking Underground Storage Tank Fund.

WHEREFORE, Petitioner, RELIABLE, prays that: (a) OSFM produce the Record; (b) a hearing be held; (c) the Board find OSFM erred in its decision, (d) the Board direct OSFM issue a new eligibility and deductibility determination, and (e) grant such other and further relief as it deems meet and just.

Respectfully submitted,

RELIABLE STORES, INC., Petitioner

BY: LAW OFFICE OF PATRICK D. SHAW

BY: /s/ Patrick D. Shaw

Patrick D. Shaw  
LAW OFFICE OF PATRICK D. SHAW  
80 Bellerive Road  
Springfield, IL 62704  
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Electronic Filing: Received, Clerk's Office 09/21/2018  
Office of the Illinois  
State Fire Marshal

R89

6/12/2018

Reliable Stores, Inc  
C/O Varghese Vallikalam  
905 West Roosevelt Road  
Maywood, IL 60153

In Re: Facility No. 2025658  
IEMA Incident No. 20180158  
Roosevelt 66  
905 W. Roosevelt  
Maywood, Cook, IL 60153

Dear Applicant:

The Reimbursement Eligibility and Deductible Application received on May 09, 2018 for the above referenced occurrence has been reviewed. The following determinations have been made based upon this review.

It has been determined that you are ineligible to seek payment of costs of corrective action or indemnification associated with the following tanks:

- Tank 6 12000 gallon Gasoline
- Tank 7 8000 gallon Gasoline

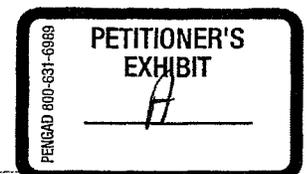
An owner or operator is eligible to access the Underground Storage Tank Fund if the eligibility requirements are satisfied:

1. Neither the owner nor the operator is the United States Government,
2. The tank does not contain fuel which is exempt from the Motor Fuel Tax Law,
3. The costs were incurred as a result of a confirmed release of any of the following substances:
  - "Fuel", as defined in Section 1.19 of the Motor Fuel Tax Law
  - Aviation fuel
  - Heating oil
  - Kerosene
  - Used oil, which has been refined from crude oil used in a motor vehicle, as defined in Section 1.3 of the Motor Fuel Tax Law.
4. The owner or operator registered the tank and paid all fees in accordance with the statutory and regulatory requirements of the Gasoline Storage Act.
5. The owner or operator notified the Illinois Emergency Management Agency of a confirmed release, the costs were incurred after the notification and the costs were a result of a release of a substance listed in this Section. Costs of corrective action or indemnification incurred before providing that notification shall not be eligible for payment.
6. The costs have not already been paid to the owner or operator under a private insurance policy, other written agreement, or court order.
7. The costs were associated with "corrective action".

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You are ineligible for reimbursement from the fund for the following reason(s):



Tank 7 8000 gallon Gasoline - Non UST related release - (415 ILCS 5/57.9) .

This constitutes the final decision as it relates to your eligibility and the set deductible. We reserve the right to change the deductible determination should additional information that would change the determination become available. An underground storage tank owner or operator may appeal the decision to the Illinois Pollution Control Board (Board), pursuant to Section 57.9 (c) (2). An owner or operator who seeks to appeal the decision shall file a petition for a hearing before the Board within 35 days of the date of issuance of the final decision, (35 Illinois Administrative Code 105.504(b)).

For information regarding the filing of an appeal, please contact:

Clerk  
Illinois Pollution Control Board  
State of Illinois Center  
100 West Randolph, Suite 11-500  
Chicago, Illinois 60601  
(312) 814-3620

The following tanks are also listed for this site:

- Tank 1 4000 gallon Gasoline
- Tank 2 8000 gallon Gasoline
- Tank 3 10000 gallon Gasoline
- Tank 4 550 gallon Used Oil
- Tank 5 500 gallon Heating Oil

Your application indicates that there has not been a release from these tanks under this incident number. You may be eligible to seek payment of corrective action costs associated with these tanks if it is determined that there has been a release from one or more of these tanks. Once it is determined that there has been a release from one or more of these tanks you may submit a separate application for an eligibility determination to seek corrective action costs associated with this/these tanks.

If you have any questions, please contact our Office at (217) 785-1020.

Sincerely,

Deanne Lock

Division of Petroleum and Chemical Safety

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**CERTIFICATE OF SERVICE**

I, DANIEL ROBERTSON, an Assistant Attorney General, do certify that I caused to be served this 21st day of September, 2018, the attached Notice of Electronic Filing and Record on Appeal (R1-90), and Certificate of Record on Appeal, including Index of Record on Appeal pursuant to 35 Ill. Admin. Code 105.116 and 105.212 upon the persons listed on the Notice of Electronic Filing *via email*.

/s/ Daniel Robertson  
DANIEL ROBERTSON  
Assistant Attorney General  
Environmental Bureau  
69 W. Washington St., 18<sup>th</sup> Floor  
Chicago, IL 60602  
(312) 814-3532  
drobertson@atg.state.il.us