



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276 • (217) 782-3397

PAT QUINN, GOVERNOR

JOHN J. KIM, INTERIM DIRECTOR

(217) 782-9817

TDD: (217) 782-9143

January 8, 2013

John Therriault, Clerk
Illinois Pollution Control Board
James R. Thompson Center
100 West Randolph Street, Suite 11-500

Chicago, Illinois 60601

Re: Illinois Environmental Protection Agency v. Teddy G. Brown, Trustee & Lawana R. Brown, Trustee and T&T Recycling, Inc.
IEPA File No.315-12-AC: 1990455003—Williamson County

Dear Mr. Therriault:

Enclosed for filing with the Illinois Pollution Control Board, please find the original and nine true and correct copies of the Administrative Citation Package, consisting of the Administrative Citation, the inspector's Affidavit, and the inspector's Illinois Environmental Protection Agency Tire Storage Site Inspection Checklist, issued to the above-referenced respondent(s).

On this date, a copy of the Administrative Citation Package was sent to the Respondent(s) via Certified Mail. As soon as I receive the return receipt, I will promptly file a copy with you, so that the Illinois Pollution Control Board may calculate the thirty-five (35) day appeal period for purposes of entering a default judgment in the event the Respondent(s) fails or elects not to file a petition for review contesting the Administrative Citation.

If you have any questions or concerns, please do not hesitate to contact me at the number above. Thank you for your cooperation.

Sincerely,

Michelle M. Ryan
Assistant Counsel

Enclosures



ORIGINAL

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JAN 11 2013
STATE OF ILLINOIS
Pollution Control Board

AC13-29

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

ADMINISTRATIVE CITATION

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JAN 11 2013
STATE OF ILLINOIS
Pollution Control Board

ILLINOIS ENVIRONMENTAL
PROTECTION AGENCY,

Complainant,

v.

TEDDY G. BROWN, TRUSTEE & LAWANA R.
BROWN, TRUSTEE, and T & T RECYCLING, INC.,

Respondents.

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) AC 13-29
)
) (IEPA No. 315-12-AC)
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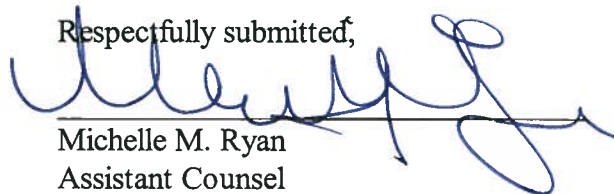
NOTICE OF FILING

To: Teddy G. Brown, Trustee
Lawana R. Brown, Trustee
P.O. Box 443
Hurst, IL 62949

T & T Recycling, Inc.
ATTN: Ted Brown
16917 State Highway 149
P.O. Box 443
Hurst, IL 62949

PLEASE TAKE NOTICE that on this date I mailed for filing with the Clerk of the Pollution Control Board of the State of Illinois the following instrument(s) entitled ADMINISTRATIVE CITATION, AFFIDAVIT, and TIRE STORAGE SITE INSPECTION CHECKLIST.

Respectfully submitted,



Michelle M. Ryan
Assistant Counsel

Illinois Environmental Protection Agency
1021 North Grand Avenue East
P.O. Box 19276
Springfield, Illinois 62794-9276
(217) 782-5544

Dated: January 8, 2013

THIS FILING SUBMITTED ON RECYCLED PAPER

RECEIVED
CLERK'S OFFICE

JAN 11 2013

STATE OF ILLINOIS
Pollution Control Board

AC

13-29

(IEPA No. 315-12-AC)

Respondents.

This Administrative Citation is issued pursuant to the authority vested in the Illinois Environmental Protection Agency by Section 31.1 of the Illinois Environmental Protection Act, 415 ILCS 5/31.1 (2010).

1. That Teddy G. Brown, Trustee and Lawana R. Brown, Trustee, are the current owners and T & T Recycling, Inc. is the current operator ("Respondents") of a property located at 16917 State Highway 149, Hurst, Williamson County, Illinois. The property is commonly known to the Illinois Environmental Protection Agency as T&T Recycling, Inc.

2. That said facility is an open dump operating without an Illinois Environmental Protection Agency Operating Permit and is designated with Site Code No. 1990455003.

3. That Respondents have owned/operated said facility at all times pertinent hereto.

4. That on December 12, 2012, Garrison Gross of the Illinois Environmental Protection Agency's ("Illinois EPA") Marion Regional Office inspected the above-described facility. A copy of

his inspection report setting forth the results of said inspection is attached hereto and made a part hereof.

5. That on 1-8-13, Illinois EPA sent this Administrative Citation via Certified Mail No. 7010 2780 0002 1167 5645.
7010 2780 0002 1167 5621

VIOLATIONS

Based upon direct observations made by Garrison Gross during the course of his December 12, 2012 inspection of the above-named facility, the Illinois Environmental Protection Agency has determined that Respondents have violated the Illinois Environmental Protection Act (hereinafter, the "Act") as follows:

- (1) That Respondent's caused or allowed the open dumping of waste in a manner resulting in litter, a violation of Section 21(p)(1) of the Act, 415 ILCS 5/21(p)(1) (2010).
- (2) That Respondent's caused or allowed the open dumping of waste in a manner resulting in open burning, a violation of Section 21(p)(3) of the Act, 415 ILCS 5/21(p)(3) (2010).
- (3) That Respondent's caused or allowed the deposition of waste in standing or flowing water, a violation of Section 21(p)(4) of the Act, 415 ILCS 21(p)(4) (2010).
- (4) That Respondent's caused or allowed standing or flowing liquid discharge from the dump site, a violation of Section 21(p)(6) of the Act, 415 ILCS 21(p)(6) (2010).

CIVIL PENALTY

Pursuant to Section 42(b)(4-5) of the Act, 415 ILCS 5/42(b)(4-5) (2010), Respondents are subject to a civil penalty of One Thousand Five Hundred Dollars (\$1,500.00) for each of the violations identified above, for a total of Six Thousand Dollars (\$6,000.00). If Respondents elect not to petition the Illinois Pollution Control Board, the statutory civil penalty specified above shall be due and payable no later than February 28, 2013 unless otherwise provided by order of the Illinois Pollution Control Board.

If Respondents elect to contest this Administrative Citation by petitioning the Illinois Pollution Control Board in accordance with Section 31.1 of the Act, 415 ILCS 5/31.1 (2010), and if the Illinois Pollution Control Board issues a finding of violation as alleged herein, after an adjudicatory hearing, Respondents shall be assessed the associated hearing costs incurred by the Illinois Environmental Protection Agency and the Illinois Pollution Control Board. Those hearing costs shall be assessed in addition to the One Thousand Five Hundred Dollar (\$1,500.00) statutory civil penalty for each violation.

Pursuant to Section 31.1(d)(1) of the Act, 415 ILCS 5/31.1(d)(1) (2010), if Respondents fail to petition or elect not to petition the Illinois Pollution Control Board for review of this Administrative Citation within thirty-five (35) days of the date of service, the Illinois Pollution Control Board shall adopt a final order, which shall include this Administrative Citation and findings of violation as alleged herein, and shall impose the statutory civil penalty specified above.

When payment is made, Respondent's check shall be made payable to the Illinois Environmental Protection Trust Fund and mailed to the attention of Fiscal Services, Illinois Environmental Protection Agency, 1021 North Grand Avenue East, P.O. Box 19276, Springfield, Illinois 62794-9276. Along with payment, Respondents shall complete and return the enclosed

Remittance Form to ensure proper documentation of payment.

If any civil penalty and/or hearing costs are not paid within the time prescribed by order of the Illinois Pollution Control Board, interest on said penalty and/or hearing costs shall be assessed against the Respondents from the date payment is due up to and including the date that payment is received. The Office of the Illinois Attorney General may be requested to initiate proceedings against Respondents in Circuit Court to collect said penalty and/or hearing costs, plus any interest accrued.

PROCEDURE FOR CONTESTING THIS
ADMINISTRATIVE CITATION

Respondents have the right to contest this Administrative Citation pursuant to and in accordance with Section 31.1 of the Act, 415 ILCS 5/31/1 (2010). If Respondents elect to contest this Administrative Citation, then Respondents shall file a signed Petition for Review, including a Notice of Filing, Certificate of Service, and Notice of Appearance, with the Clerk of the Illinois Pollution Control Board, State of Illinois Center, 100 West Randolph, Suite 11-500, Chicago, Illinois 60601. A copy of said Petition for Review shall be filed with the Illinois Environmental Protection Agency's Division of Legal Counsel at 1021 North Grand Avenue East, P.O. Box 19276, Springfield, Illinois 62794-9276. Section 31.1 of the Act provides that any Petition for Review shall be filed within thirty-five (35) days of the date of service of this Administrative Citation or the Illinois Pollution Control Board shall enter a default judgment against the Respondents.



John J. Kim, Interim Director
Illinois Environmental Protection Agency

Date: 1/3/13

Prepared by: Susan E. Konzelmann, Legal Assistant
Division of Legal Counsel
Illinois Environmental Protection Agency
1021 North Grand Avenue East
P.O. Box 19276
Springfield, Illinois 62794-9276
(217) 782-5544

REMITTANCE FORM

RECEIVED
CLERK'S OFFICE

JAN 11 2013

STATE OF ILLINOIS
Pollution Control Board

ILLINOIS ENVIRONMENTAL
PROTECTION AGENCY,

Complainant,

v.

TEDDY G. BROWN, TRUSTEE & LAWANA
R. BROWN, TRUSTEE, and T & T
RECYCLING, INC.,

Respondents.

AC

(IEPA No. 315-12-AC)

FACILITY: T & T Recycling, Inc.

SITE CODE NO.: 1990455003

COUNTY: Williamson

CIVIL PENALTY: \$6,000.00

DATE OF INSPECTION: December 12, 2012

DATE REMITTED:

SS/FEIN NUMBER:

SIGNATURE:

NOTE

Please enter the date of your remittance, your Social Security number (SS) if an individual or Federal Employer Identification Number (FEIN) if a corporation, and sign this Remittance Form. Be sure your check is enclosed and mail, along with Remittance Form, to Illinois Environmental Protection Agency, Attn.: Fiscal Services, P.O. Box 19276, Springfield, Illinois 62794-9276.

STATE OF ILLINOIS)
) SS
COUNTY OF WILLIAMSON)

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JAN 11 2013
STATE OF ILLINOIS
Pollution Control Board

AFFIDAVIT

AC13-29

I, Garrison Gross, being first duly sworn upon oath, depose and state as follows:

1. Affiant is a field inspector employed by the Land Pollution Control Division of the Illinois Environmental Protection Agency and has been so employed at all times pertinent hereto.

2. On December 12, 2012, between 9:45 A.M. and 10:40 A.M., Affiant conducted an inspection of T & T Recycling, Inc. in Williamson County, Illinois, known as T & T Recycling, Inc. by the Illinois Environmental Protection Agency. Said site has been assigned site code number 1990455003 by the Agency.

3. Affiant inspected said T & T Recycling, Inc. site by an on-site inspection, which included walking and photographing the site.

4. As a result of the material actions referred to in paragraph 3 above, Affiant completed the Inspection Report form attached hereto and made a part hereof, which, to the best of Affiant's knowledge and belief, is an accurate representation of Affiant's observations and factual conclusions with respect to said T & T Recycling, Inc. site.

FURTHER AFFIANT SAYETH NOT.

/s/ Garrison Gross

Subscribed and Sworn to before
me this 19th day of December, 2012

Gail Stricklin
Notary Public



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

Tire Storage Site Inspection Checklist

County: Williamson LPC#: 1990455003 Region: 7- Marion

Facility Name: T & T Recycling, Inc.

Facility Location: 16917 State Highway 149, Hurst, Illinois 62949 Telephone: 618-987-2088

Date: December 12, 2012 Time: From 9:45 A.M. To 10:40 A.M. Previous Inspection Date: February 25, 2005

Inspector: Garrison Gross No. of Photos Taken: # 27

Weather: clear skies, 40° F, light breeze No. of Samples Taken: N/A

Interviewed: Brandon McMahon Complaint #: N/A - routine

Waste Tire Hauler Used: self-hauling **unregistered** Hauler Registration Number: **unregistered**

Responsible Party Mailing Address(es): T & T Recycling, Inc.
Attn: Teddy G. Brown
P.O. Box 443
Hurst, Illinois 62949

Owner(s): Teddy G. Brown & Lawana R. Brown, Trustees
P.O. Box 443
Hurst, Illinois 62949

RECEIVED
CLEARANCE OFFICE
JAN 11 2013

STATE OF ILLINOIS
Pollution Control Board

~700 Estimated Number of Used Tires Located At This Facility, including altered, converted and reprocessed tires.

SECTION	DESCRIPTION	VIOL
ILLINOIS ENVIRONMENTAL PROTECTION ACT REQUIREMENTS		
1	21(k) FAIL OR REFUSE TO PAY ANY FEE IMPOSED UNDER THIS ACT	<input checked="" type="checkbox"/>
2	55(a)(4) CAUSE OR ALLOW THE OPERATION OF A TIRE STORAGE SITE EXCEPT IN COMPLIANCE WITH BOARD REGULATIONS Note: Also Mark appropriate Violations of Part 848	<input checked="" type="checkbox"/>
3	55(b-1) NO PERSON SHALL KNOWINGLY MIX ANY USED OR WASTE TIRE, EITHER WHOLE OR CUT, WITH MUNICIPAL WASTE	<input type="checkbox"/>
4	55(c) FAILURE TO FILE THE REQUIRED NOTIFICATION WITH THE AGENCY BY 1/1/90 OR WITHIN 30 DAYS OF COMMENCEMENT OF THE STORAGE ACTIVITY.	<input checked="" type="checkbox"/>
5	55(d)(1) CAUSE OR ALLOW THE OPERATION OF A TIRE STORAGE SITE WHICH CONTAINS MORE THAN 50 USED TIRES WITHOUT MEETING THE FOLLOWING REQUIREMENTS BY JANUARY 1 OF EACH YEAR: i. Register the Site with the Agency ii. Certify to the Agency that the Site Complies with any Applicable Standards Adopted by the Board Pursuant to Section 55.2 iii. Report to the Agency the Number of Tires Accumulated, the Status of Vector Controls, and the Actions Taken to Handle and Process the Tires iv. Pay the Fee Required under Subsection (b) of Section 55.6	<input checked="" type="checkbox"/>
6	55(e) CAUSE OR ALLOW THE STORAGE, DISPOSAL, TREATMENT OR PROCESSING OF ANY USED OR WASTE TIRE IN VIOLATION OF ANY REGULATION OR STANDARD ADOPTED BY THE BOARD. Note: Also Mark appropriate Violations of Part 848	<input checked="" type="checkbox"/>
7	55(f) ARRANGE FOR THE TRANSPORTATION OF USED OR WASTE TIRES AWAY FROM THE SITE OF GENERATION WITH A PERSON KNOWN TO OPENLY DUMP SUCH TIRES	<input type="checkbox"/>
8	55(g) ENGAGE IN ANY OPERATION AS A USED OR WASTE TIRE TRANSPORTER EXCEPT IN COMPLIANCE WITH BOARD REGULATIONS. Note: Also Mark a Violation of Subpart F	<input checked="" type="checkbox"/>
9	55(h) CAUSE OR ALLOW THE COMBUSTION OF ANY USED OR WASTE TIRE IN AN ENCLOSED DEVICE UNLESS A PERMIT HAS BEEN ISSUED BY THE AGENCY	<input type="checkbox"/>

10	55(i)	CAUSE OR ALLOW THE USE OF PESTICIDES TO TREAT TIRES EXCEPT AS PRESCRIBED BY BOARD REGULATIONS Note: Also Mark a Violation of 848.205	<input type="checkbox"/>
11	55.6(b)	FAILURE OF THE OWNER OR OPERATOR OF A TIRE STORAGE SITE TO PAY TO THE AGENCY AN ANNUAL FEE OF \$100.00 BY JANUARY 1 OF EACH YEAR.	<input checked="" type="checkbox"/>
12	55.8(a)	ANY PERSON SELLING TIRES AT RETAIL OR OFFERING TIRES FOR RETAIL SALE IN THIS STATE SHALL:	
	(1)	Collect from Retail Customers a Fee of \$2.50 Per Tire Sold to be Paid to the Department of Revenue.	<input type="checkbox"/>
	(2)	Accept for Recycling Used Tires from Customers, at the Point of Transfer, in Quantity Equal to the Number of New Tires Purchased.	<input type="checkbox"/>
	(3)	Post in a Conspicuous Place a Written Notice at Least 8.5 by 11 Inches in Size that Includes the Universal Recycling Symbol and the Following Statements: "DO NOT put used tires in the trash.", and "State law requires us to accept used tires for recycling, in exchange for new tires purchased."	<input type="checkbox"/>
13	55.8(b)	A PERSON WHO ACCEPTS USED TIRES FOR RECYCLING UNDER 55.8(a) SHALL NOT ALLOW THE TIRES TO ACCUMULATE FOR PERIODS OF MORE THAN 90 DAYS	<input type="checkbox"/>
14	55.9	RETAILERS SHALL COLLECT THE FEE FROM PURCHASER BY ADDING THE FEE TO THE SELLING PRICE OF THE TIRE. THE FEE IMPOSED SHALL BE STATED AS A DISTINCT ITEM SEPARATE AND APART FROM THE SELLING PRICE	<input type="checkbox"/>
PART 848, SUBPART B: MANAGEMENT STANDARDS			
15	848.202(b)	AT SITES AT WHICH MORE THAN 50 USED OR WASTE TIRES ARE LOCATED THE OWNER OR OPERATOR SHALL:	
	(1)	NOT Place on or Accumulate Any Used or Waste Tire in Any Pile Outside of Any Building Unless the Pile is Separated from All Other Piles by 25 Feet and Aisle Space Is Maintained To Allow the Unobstructed Movement of Personnel and Equipment	<input type="checkbox"/>
	(2)	NOT Accumulate Any Used or Waste Tire in Any Area Located Outside of Any Building Unless the Accumulation is Separated from All Buildings, Whether on or off the Site, by 25 Feet	<input type="checkbox"/>
	(3)	NOT Place On or Accumulate Any Used or Waste Tire in Any Pile Which is Less than 250 Feet from any Potential Ignition Source, including Cutting and Welding Devices, and Open Fires unless all such activities are Carried Out Within A Building	<input type="checkbox"/>
	(4)	Drain Any Used or Waste Tire on the Day of Generation or Receipt	<input type="checkbox"/>
	(5)	NOT Store Any Used or Waste Tire for More Than 14 Days after Receipt Without Altering, Reprocessing, Converting, Covering or Otherwise Preventing the Tire from Accumulating Water	<input type="checkbox"/>
	(7)	NOT Accept Any Used or Waste Tire from a Vehicle in Which More than 20 Tires Are Loaded Unless the Vehicle Displays a Placard Issued by the Agency Under Part 848: Subpart F	<input type="checkbox"/>
	(8)	NOT Accumulate Any Tires in an Area with a Grade Exceeding 2% Without Meeting the Requirements of 848.202(d)(3)	<input type="checkbox"/>
16	848.202(c)	IN ADDITION TO THE REQUIREMENTS SET FORTH IN 848.202 (b), THE OWNER OR OPERATOR OF A SITE AT WHICH MORE THAN 500 USED OR WASTE TIRES ARE LOCATED SHALL:	
	(1)	Maintain a Contingency Plan Which Meets the Requirements of Section 848.203	<input checked="" type="checkbox"/>
	(2)	Meet the Record Keeping and Reporting Requirements of Part 848: Subpart C Note: Also Mark a Violation of Subpart C	<input checked="" type="checkbox"/>
	(3)	NOT Place or Accumulate any Used or Waste Tire in Any Pile Less Than 50 Feet From Grass, Weeds, Brush, Over-hanging Tree Limbs and Similar Vegetative Growth	<input type="checkbox"/>
	(4)	NOT Place or Accumulate any Used or Waste Tire in Any Tire Storage Unit That is More Than 20 Feet High by 250 Feet Wide by 250 Feet Long(Aisle Space Between Any Piles Within the Unit Shall Be Included in Determining the Width or Length of the Unit)	<input type="checkbox"/>

	(5)	NOT Place or Accumulate any Used or Waste Tires in any Tire Storage Unit Unless they meet: (A) <input type="checkbox"/> Tires are separated by a Berm 1.5 times the height of the tire pile (B) <input type="checkbox"/> Separation Requirements of this part.	<input type="checkbox"/>
17	848.202(d)	IN ADDITION TO THE REQUIREMENTS SET FORTH IN 848.202 (b) AND (c), THE OWNER OR OPERATOR AT SITES AT WHICH MORE THAN 10,000 USED OR WASTE TIRES ARE LOCATED SHALL:	
	(1)	Completely Surround the Site by Fencing in Good Repair Which Is Not less than 6 Feet in Height	<input type="checkbox"/>
	(2)	Maintain an Entrance to the Area Where Used or Waste Tires are Located, Which is Controlled At all Times by an Attendant, Locked Entrance, Television Monitors, Controlled Roadway Access or Other Equivalent Mechanism	<input type="checkbox"/>
	(3)	Completely Surround the Area Where Used or Waste Tires Are Stored by an Earthen Berm or Other Structures Not Less Than 2 Feet in Height Capable of Containing Runoff Resulting from Tire Fires, and Accessible by Fire Fighting Equipment, Except that the Owner or Operator Shall Provide a Means for Access through or Over the Berm or Other Structure	<input type="checkbox"/>
18	848.203	CONTINGENCY PLAN REQUIREMENTS FOR STORAGE SITES WITH MORE THAN 500 TIRES	
	(a)	The owner/operator must meet the requirements of Section 848.203 Note: Also Mark a Violation of 848.203(b), (c), (d), (e), (f), (g), or (h)	<input checked="" type="checkbox"/>
	(b)	The contingency plan must be designed to minimize the hazard to human health and the environment from fires and run-off of contaminants resulting from fires and from disease spreading mosquitos and other nuisance organisms which may breed in water accumulations in used or waste tires.	<input checked="" type="checkbox"/>
	(c)	Immediately implement the contingency plan whenever there is a fire or run-off resulting from a tire fire, or whenever there is evidence of mosquito production.	<input type="checkbox"/>
	(d)	The contingency plan must describe the actions that must be taken in response to fires, run-off resulting from tire fires and mosquito breeding in used or waste tires.	<input checked="" type="checkbox"/>
	(e)	The contingency plan must include evacuation procedures for site personnel, including signals, evacuation routes and alternate evacuation routes as well as provisions for pesticide application.	<input checked="" type="checkbox"/>
	(f)	The contingency plan must be maintained at the site and submitted to state and local authorities.	<input checked="" type="checkbox"/>
	(g)	The contingency plan must be reviewed and amended within 30 days if the plan fails or the emergency coordinator changes.	<input type="checkbox"/>
	(h)	At all times, there must be one employee on site or on call with responsibility for coordinating emergency response procedures. The emergency coordinator must be familiar with the plan and all aspects of the site, and have the authority to commit the resources to carry out the plan.	<input type="checkbox"/>
STORAGE OF USED AND WASTE TIRES WITHIN BUILDINGS			
19	848.204(a)	FAILURE TO MEET THE REQUIREMENTS OF SECTION 848.204 Note: Also Mark a Violation of 848.204(b), (c), or (d)	<input checked="" type="checkbox"/>
20	848.204(b)	STORAGE OF LESS THAN 500 TIRES WITHIN A BUILDING ALLOWED IF: (1) <input type="checkbox"/> Tires Drained of All Water Prior to Placement in the Building (2) <input checked="" type="checkbox"/> All of the Buildings Windows and Doors Maintained in Working Order and Secured to Prevent Unauthorized Access. (3) <input type="checkbox"/> The Building Is Maintained So That it Is Fully Enclosed and Has a Roof and Sides Which Are Impermeable to Precipitation (4) <input type="checkbox"/> The Storage of Used or Waste Tires Is not in a Single Family Home or a Residential Dwelling	<input checked="" type="checkbox"/>
21	848.204(c)	IN ADDITION TO THE REQUIREMENTS SET FORTH IN SECTION 848.204(b), THE OWNER OPERATOR OF A SITE WITH 500 OR MORE USED OR WASTE TIRES STORED WITHIN BUILDINGS SHALL:	

	(1)	Develop a tire storage plan in consultation with fire officials meeting the requirements of: 848.204 (c)(1) (A) <input checked="" type="checkbox"/> considering the type of building to be used for the tire storage (B) <input checked="" type="checkbox"/> the plan shall include tire storage arrangement; aisle space; clearance distances between tire piles and sprinkler deflectors; and access to fire fighting personnel and equipment (C) <input checked="" type="checkbox"/> a copy of the plan shall be filed with the Agency within 60 days and implemented within 14 days of filing with the Agency.	<input checked="" type="checkbox"/>
	(2)	Have and maintain a contingency plan which meets the requirements of Section 848.203	<input checked="" type="checkbox"/>
	(3)	Meet the record keeping and reporting requirements of Subpart C Note: Also Mark a Violation of Section 848, Subpart C	<input checked="" type="checkbox"/>
22	848.204(d)	A BUILDING THAT STORES MORE THAN 10,000 USED OR WASTE TIRES, AND WAS CONSTRUCTED AFTER 5/10/91, FOR THE PRIMARY PURPOSE OF STORING USED OR WASTE TIRES, SHALL COMPLY WITH THE NFPA 231D BUILDING STANDARD.	<input type="checkbox"/>
PESTICIDE TREATMENT			
23	848.205	OWNERS OR OPERATORS OF TIRE STORAGE SITES TREATING USED OR WASTE TIRES WITH PESTICIDES PURSUANT TO THIS PART OF TITLE XIV OF THE ACT (SHALL):	
	(a)	Use a Pesticide Labeled for Control of Mosquito Larvae Unless an Adult Mosquito Problem is Identified	<input type="checkbox"/>
	(b)	Maintain a record of pesticide use at the site which shall include for each application: (1) <input type="checkbox"/> Date of Pesticide Application (2) <input type="checkbox"/> Number of Used or Waste Tires Treated (3) <input type="checkbox"/> Amount of Pesticide Applied (4) <input type="checkbox"/> Type of Pesticide Used	<input type="checkbox"/>
	(c)	Notify the Agency of Pesticide Use Within 10 Days of Each Application. Notification shall include the information in 848.205(b).	<input type="checkbox"/>
24	848.205(d)	Persons Applying Pesticides to Used and Waste Tires Must Comply with the Requirements of the Illinois Pesticide Act (Ill. Rev. Stat. 1989, ch. 5, par. 801 et seq.)	<input type="checkbox"/>
PART 848: SUBPART C: RECORD KEEPING AND REPORTING Note: Applies to Storage Sites with More than 500 Used or Waste Tires			
25	848.302(a)	The owner/operator shall keep on site a: (1) <input checked="" type="checkbox"/> Daily Tire Record (2) <input checked="" type="checkbox"/> Annual Tire Summary	<input checked="" type="checkbox"/>
26	848.303(a)	FAILURE TO MAINTAIN A DAILY TIRE RECORD THAT INCLUDES: <input type="checkbox"/> Day of the Week <input type="checkbox"/> Date <input type="checkbox"/> Agency Site Number <input type="checkbox"/> Site Name and Address	<input type="checkbox"/>
27	848.303(b)	FAILURE TO RECORD IN THE DAILY TIRE RECORD THE FOLLOWING INFORMATION (1) <input type="checkbox"/> Weight or volume of used or waste tires received at the site during the operating day (2) <input type="checkbox"/> Weight or volume of used or waste tires transported from the site and the destination of the tires so transported. (3) <input type="checkbox"/> Total number of used or waste tires remaining in storage at the conclusion of the day. (4) <input type="checkbox"/> Weight or volume of used or waste tires burned or combusted during the day.	<input type="checkbox"/>
28	848.304	FAILURE TO MAINTAIN ON SITE AN ANNUAL TIRE SUMMARY FOR EACH CALENDAR YEAR THAT INCLUDES:	
	(a)	The site number, name and address and the calendar year for which the summary applies.	<input type="checkbox"/>
	(b)(1)	The weight or volume of used or waste tires received at the site during the calendar year.	<input type="checkbox"/>
	(b)(2)	The weight or volume of used or waste tires transported from the site during the calendar year.	<input type="checkbox"/>
	(b)(3)	The total number of used or waste tires determined in PTE remaining in storage at the conclusion of the calendar year	<input type="checkbox"/>

	(b)(4)	The weight or volume of used or waste tires combusted during the calendar year.	<input type="checkbox"/>
29	848.304(c)	FAILURE TO SUBMIT THE ANNUAL TIRE SUMMARY BY JANUARY 31 OF EACH YEAR	<input type="checkbox"/>
30	848.305	FAILURE TO RETAIN REQUIRED RECORDS ON SITE FOR 3 YEARS	<input type="checkbox"/>
<p align="center">PART 848: SUBPART D: FINANCIAL ASSURANCE NOTE: Applies to Sites which have Stored 5000 or More Used or Waste Tires</p>			
31	848.400(b)(1)	AT TIRE STORAGE SITES AT WHICH TIRES ARE FIRST STORED ON OR AFTER 1/1/92, FAILURE TO COMPLY WITH SUBPART D PRIOR TO STORING ANY USED OR WASTE TIRES Note: Also Mark a Violation of 848.401 or 848.404	<input type="checkbox"/>
32	848.400(b)(2)	AT TIRE STORAGE SITES AT WHICH TIRES ARE STORED PRIOR TO 1/1/92, FAILURE TO COMPLY WITH SUBPART D BY 1/1/92. Note: Also Mark a Violation of 848.401 or 848.404	<input type="checkbox"/>
33	848.401(a)	FAILURE TO MAINTAIN FINANCIAL ASSURANCE EQUAL TO OR GREATER THAN THE CURRENT COST ESTIMATE CALCULATED PURSUANT TO SECTION 848.404 AT ALL TIMES, EXCEPT AS OTHERWISE PROVIDED BY 848.401 (b).	<input type="checkbox"/>
34	848.401(b)	FAILURE TO INCREASE THE TOTAL AMOUNT OF FINANCIAL ASSURANCE SO AS TO EQUAL THE CURRENT COST ESTIMATE WITHIN 90 DAYS AFTER ANY OF THE FOLLOWING: (1) <input type="checkbox"/> an increase in the current cost estimate (2) <input type="checkbox"/> a decrease in the value of a trust fund (3) <input type="checkbox"/> a determination by the Agency that an owner or operator no longer meets the financial test of Section 848.415 (4) <input type="checkbox"/> notification by the owner or operator that the owner or operator intends to substitute alternative financial assurance, as specified in Section 848.406 for self-insurance	<input type="checkbox"/>
35	848.404(a)(2)	BY JANUARY 1 OF EACH YEAR, FAILURE TO SUBMIT A WRITTEN COST ESTIMATE OF THE COST OF REMOVING ALL TIRES.	<input type="checkbox"/>
36	848.404(b)	FAILURE TO REVISE THE COST ESTIMATE WHEN COST ESTIMATES INCREASE.	<input type="checkbox"/>
<p align="center">PART 848: SUBPART F: TIRE TRANSPORTATION REQUIREMENTS</p>			
37	848.601(a)	NO PERSON SHALL TRANSPORT MORE THAN 20 USED OR WASTE TIRES IN A VEHICLE UNLESS THE FOLLOWING REQUIREMENTS ARE MET: (1) <input checked="" type="checkbox"/> the owner or operator has registered the vehicle with the Agency in accordance with Subpart F, received approval of such registration from the Agency, and such registration is current, valid and in effect (2) <input type="checkbox"/> the owner or operator displays a placard on the vehicle, issued by the Agency following registration, in accordance with the requirements of Subpart F.	<input checked="" type="checkbox"/>
38	848.601(b)	NO PERSON SHALL PROVIDE, DELIVER OR TRANSPORT USED OR WASTE TIRES TO A TIRE TRANSPORTER FOR TRANSPORT UNLESS THE TRANSPORTER'S VEHICLE DISPLAYS A PLACARD ISSUED BY THE AGENCY UNDER SUBPART F IDENTIFYING THE TRANSPORTER AS A REGISTERED TIRE HAULER.	<input type="checkbox"/>
39	848.606(a)	UPON APPROVAL OF A REGISTRATION AS A TIRE TRANSPORTER, THE OWNER OR OPERATOR OF ANY VEHICLE REGISTERED TO TRANSPORT USED OR WASTE TIRES SHALL PLACE A PLACARD ON OPPOSITE SIDES OF THE VEHICLES WHICH DISPLAYS A NUMBER ISSUED BY THE AGENCY FOLLOWING THE WORDS "Registered Tire Transporter: (number)."	<input type="checkbox"/>
40	848.606(b)	REGISTERED TIRE TRANSPORTER NUMBERS AND LETTERS SHALL BE REMOVABLE ONLY BY DESTRUCTION. DIRECTLY ADJACENT TO THE WORDS AND NUMBER, THE VEHICLE OWNER AND OPERATOR SHALL DISPLAY A SEAL FURNISHED BY THE AGENCY WHICH SHALL DESIGNATE THE DATE ON WHICH THE REGISTRATION EXPIRES.	<input type="checkbox"/>
<p align="center">THE FOLLOWING VIOLATIONS MAY BE CITED WHEN WASTES, INCLUDING TIRES, HAVE BEEN <u>DISPOSED</u> AT A TIRE STORAGE SITE</p>			
41	9(a)	CAUSE, THREATEN OR ALLOW AIR POLLUTION IN ILLINOIS.	<input checked="" type="checkbox"/>
42	9(c)	CAUSE OR ALLOW OPEN BURNING	<input checked="" type="checkbox"/>

43	12(a)	CAUSE, THREATEN OR ALLOW WATER POLLUTION IN ILLINOIS	<input checked="" type="checkbox"/>
44	12(d)	CREATE A WATER POLLUTION HAZARD	<input checked="" type="checkbox"/>
45	21(a)	CAUSE OR ALLOW OPEN DUMPING <input type="checkbox"/> USED TIRES <input checked="" type="checkbox"/> OTHER WASTE	<input checked="" type="checkbox"/>
46	21(d)(2)	CONDUCT ANY WASTE- STORAGE, WASTE-TREATMENT, OR WASTE-DISPOSAL OPERATION IN VIOLATION OF ANY REGULATIONS OR STANDARDS ADOPTED BY THE BOARD UNDER THIS ACT. Note: Also Mark appropriate Violations of Part 848	<input checked="" type="checkbox"/>
47	21(e)	DISPOSE, TREAT, STORE, OR ABANDON ANY WASTE AT A SITE WHICH DOES NOT MEET THE REQUIREMENTS OF THIS ACT AND REGULATIONS. Note: Also Mark appropriate Violations of Part 848	<input checked="" type="checkbox"/>
48	21(p)	CAUSE OR ALLOW THE OPEN DUMPING OF ANY WASTE IN A MANNER WHICH RESULTS IN ANY OF THE FOLLOWING	
	(1)	Litter	<input checked="" type="checkbox"/>
	(2)	Scavenging	<input checked="" type="checkbox"/>
	(3)	Open Burning	<input checked="" type="checkbox"/>
	(4)	Deposition of Waste in Standing or Flowing Waters	<input checked="" type="checkbox"/>
	(5)	Proliferation of Disease Vectors	<input type="checkbox"/>
	(6)	Standing or Flowing Liquid Discharge from the Dump Site	<input checked="" type="checkbox"/>
	(7)	Deposition of General Construction or Demolition Debris; or Clean Construction or Demolition Debris	<input type="checkbox"/>
49	55(k)(1)	No person shall cause or allow water to accumulate in used or waste tires. The prohibition set forth in this paragraph (1) of subsection (k) shall not apply to used or waste tires located at a residential household, as long as not more than 12 used or waste tires are located at the site.	<input checked="" type="checkbox"/>
50	722.111	Hazardous Waste Determination (Auto Salvage Residue)	<input checked="" type="checkbox"/>
51	808.121	Special Waste Determination (Auto Salvage Residue)	<input checked="" type="checkbox"/>
52	733.114(d)(1)	Failure to properly label universal waste mercury containing equipment or containers	<input type="checkbox"/>
53	733.115	Failure to document the start date for collection of universal waste mercury containing equipment	<input type="checkbox"/>
54	739.122(c)	Failure to properly label used oil containers as "Used Oil"	<input checked="" type="checkbox"/>
55	12(b)	Operate any equipment or facility capable of causing or contributing to water pollution	<input checked="" type="checkbox"/>
56	309.102(a)	NPDES Permit Required (Automobile Salvage Yard)	<input checked="" type="checkbox"/>
57	10(a)	Mercury Switch Removal Act; Failure to properly manage mercury switches from end-of-life vehicles	<input type="checkbox"/>
58	10(d)	Mercury Switch Removal Act; Failure to submit mercury switch annual report	<input type="checkbox"/>

Informational Notes:

- [Illinois] Environmental Protection Act: 415 ILCS 5/1 et seq.
- Illinois Pollution Control Board: 35 Ill. Adm. Code, Subtitle G.
- Illinois Pollution Control Board: 35 Ill. Adm. Code, Subtitle G, Chapter I, Subchapter m, Part 848.
- Statutory and regulatory references herein are provided for convenience only and should not be construed as legal conclusions of the Agency or as limiting the Agency's statutory or regulatory powers. Requirements of some statutes and regulations cited are in summary format. Full text of requirements can be found in the references listed in #1, #2, and #3 above.
- The provisions of subsection (p) of Section 21 and (k) of Section 55 of the [Illinois] Environmental Protection Act shall be enforceable either by administrative citation under Section 31.1 of the Act or by complaint under Section 31 of the Act.
- This inspection was conducted in accordance with Sections 4(c) and 4(d) of the [Illinois] Environmental Protection Act: 415 ILCS 5/4(c) and (d).



State of Illinois
ENVIRONMENTAL PROTECTION AGENCY
Narrative Inspection Report

LPC #: 1990455003 – Williamson County

Site Name: T & T Recycling, Inc.

Date of Inspection: December 12, 2012

Inspector: Garrison Gross

Subject: Tire Storage Inspection at T & T Recycling, Inc.

General Remarks: A Tire Storage Inspection was conducted on Wednesday, December 12, 2012, at T & T Recycling, Inc. The inspection was conducted by Garrison Gross representing the Illinois EPA Bureau of Land. Becky Jayne representing the Illinois EPA Pollution Prevention Program accompanied me during the inspection. The site is located at 16917 State Highway 149, Hurst, Illinois 62949. The inspection was routine in nature. Weather conditions at the time of the inspection were clear skies, 40° F, with a light breeze. Surface conditions at the site were muddy.

Inspection Findings: The inspection began at approximately 9:45 A.M. The inspectors entered the site and met with Brandon McMahon, facility manager. We introduced ourselves and explained the reason for the inspection. Mr. McMahon stated that he had worked at the facility for approximately four years. We continued the inspection by walking and photographing the facility. The facility accepts vehicles, white goods, and other ferrous and non-ferrous metals for recycling. The business is registered with the Secretary of State as an auto parts recycler. Vehicles are processed to remove the engine block, fluids, batteries and wheels. Vehicle processing is performed outside on a concrete pad. Once the components are removed, they are stored in designated locations.

Area A: We walked to the tire storage area. Used / waste tires were being stored in enclosed box trailers (photos 001 and 002). The box trailers were located at the northeast corner of the site and one was used for passenger tires, the other was used for semi-truck and tractor tires. Upon observation, we noted that all of the tires were not being stored inside. Several tires were outside and exposed to the element. A few tires had accumulated water (ice) (photo 003). We also noted that the entrance ramps prevented the rear doors from closing and locking. Approximately 700 used / waste tires were located in this area. Mr. McMahon told us that the business hauls their used / waste tires to Kentucky for disposal. We asked about the sale of new or used tires. Mr. McMahon told us the facility did not sell tires. He told us that tires are accepted for disposal and customers are charged twelve cents per pound for disposal.

We informed him that the facility was not registered as a tire storage site and they were not properly handling used / waste tires. We explained that procedures would need to be changed to prevent the tires from accumulating water. We recommended that the doors to the box trailers be closed when not in use and that tires be stored upon generation / receipt.

Area B: We observed the building where engines were being dismantled and drained of fluids. The building is enclosed and the floor is pitched toward a sump pit in the center of the room. Mr. McMahon stated that the sump was sealed and not connected to any drains. He told us that spilled fluids are recovered and stored in a tote to be sold to Safety-Kleen. We observed two dumpster boxes located outside the building. The boxes were being used to store engines and transmission cases. Automotive fluids had been allowed to spill on the concrete pad (photo 004). One of the dumpster boxes had holes in the bottom and side which allowed fluids to spill onto the ground (photos 005 and 006). We informed Mr. McMahon that the facility needed to prevent spillage of automotive fluids during crushing and / or dismantling operations.

Used oil and gasoline containers were stored in a nearby maintenance building (photos 018 and 019). The containers were not properly labeled. We recommended that the automotive fluid containers be labeled

**1990455003 – Williamson County
T & T Recycling, Inc.
December 12, 2012**

indicating the appropriate type of waste fluid. Universal waste batteries were being stored in cardboard / pallet Gaylord-type containers (photo 020). The batteries were stored out of the weather and damaged or leaking batteries could be identified because pallets were being used. The battery storage area was not properly labeled. We recommended that the battery storage area be labeled as “universal waste batteries.” We informed him that waste batteries should not be allowed to accumulate for more than one year and records should be kept to document the receipt and disposal of waste batteries.

Area C: We walked to the west side of the site. We observed the area where vehicles engine and transmissions are taken for storage after being drained of fluids. We observed two (2) roll-off-boxes being used for this purpose. The roll-off-boxes were located next to a drainage ditch. Both roll-off-boxes had holes near the bottom and automotive fluids were spilling onto the ground and into the drainage ditch (photos 007 and 008). Stormwater was flowing west through a drainage pipe and exiting the facility (photo 009). A petroleum product odor was detected and a visible sheen was observed on the water surface. Scattered debris was also observed in the water. A few used / waste tires were observed in the nearby scrap metal pile. Mr. McMahon told us that axels are periodically unloaded that still have tires mounted on the wheel. He explained that the tires are sheered from the wheel, collected and taken to the tire storage area. One of the tires contained mud and water (photo 011).

Area D: A pile of engine blocks was observed north of the scrap metal pile. The engine blocks were not being stored in roll-off-boxes. Automotive fluids had spilled onto the ground and the surrounding soil was dark in color (photo 012). A petroleum product odor was detected. Small puddles of spilled automotive fluids were also observed in this area (photo 013). A pile of automotive / metal salvage residue (ASR) was observed near the pile of engine blocks (photos 014 and 015). Approximately 80 cubic yards of ASR were present and was comprised of soil and gravel comingled with metal, plastic, foam, rubber and glass. I asked Mr. McMahon about the disposal of the ASR. He told us that he wasn't aware that any ASR had been removed from the site. We recommended that automotive salvage residue (ASR) not be allowed to accumulate for more than a year and ensure that it was disposed at a permitted landfill.

Evidence of open burning was observed at the northwest corner of the facility (photos 016 and 017). Lumber, charred wood, plastic, insulation and small metal fragments were observed in the ash. The area was L shaped and measured approximately 16 yards long by 2 yards wide and contained approximately 5-10 cubic yards of ash and waste. We asked Mr. McMahon what the facility had been burning. He told us that waste pallets were routinely burned at the location. He also told us that approximately ten (10) utility trailers had been burned at the location to remove wooden decking. We informed him that open burning and scavenging should cease immediately. We told him that wastes other than on-site generated landscape wastes should not be burned at the site. We also told him that metals should not be burned to remove insulation or other non-metal components. We suggested that the pallets be recycled or hauled to a permitted landfill or transfer station for disposal.

Mercury Switches: We asked Mr. McMahon whether mercury switches were removed from vehicles prior to crushing the vehicles or sending them off-site for scrap processing. He stated that T & T did not accept vehicles from anyone unless the mercury switches had been removed. Mr. McMahon further stated that T & T employees verified that switches had been removed prior to accepting vehicles. Vehicle recyclers and scrap metal processors that do not remove switches are not required to maintain any records under the Mercury Switch Removal Act.

1990455003 – Williamson County
T & T Recycling, Inc.
December 12, 2012

We returned to the office. We asked to review disposal receipts for tires and automotive fluids. T & T Recycling provided two receipts showing they had disposed of 80 tons of tires at Liberty Tire Recycling on March 6, 2012 (Invoice # 77011) and April 3, 2011 (Invoice # 73578). We reviewed two receipts for used oil disposal. Safety-Kleen removed 558 gallons on November 2, 2102 and 631 gallons on April 4, 2012. We informed Mr. McMahon that the facility would be receiving a letter in the near future. The inspection ended at approximately 10:40 A.M.

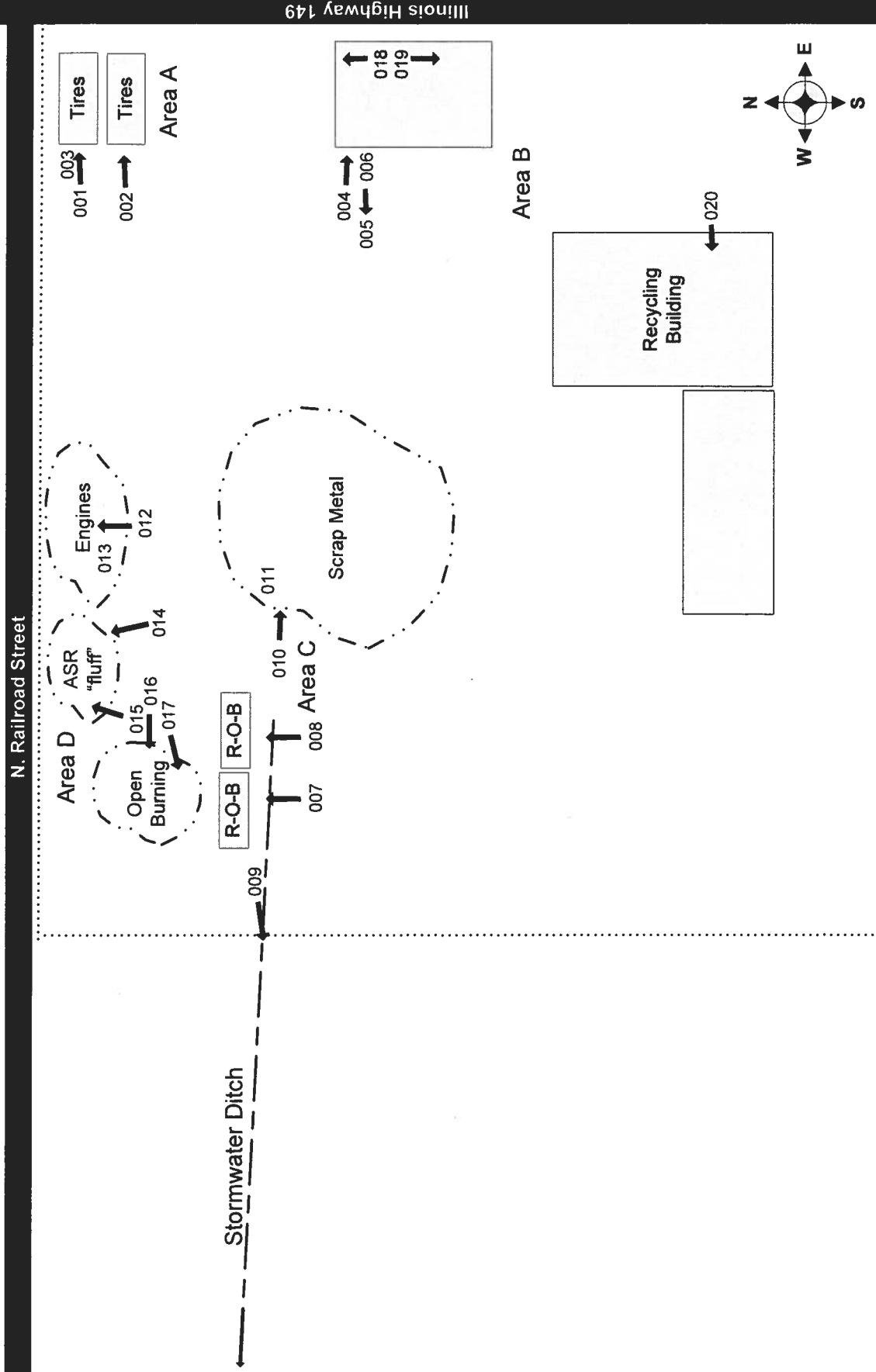
Additional Remarks: Agency records indicate that T & T Recycling, Inc. failed to submit a Used / Waste Tire Activity Notification & Registration Form for tire storage activities. The facility notified as tire storage-exempt in August 2, 1999. Agency records indicate that the facility was registered as a used tire transporter (T-7041) but the registration expired on February 28, 2009. Agency records also indicate that the facility has not filed for an NPDES Stormwater Permit. Information obtained from the Williamson County Supervisor of Assessment's Office indicated that tax bills are mailed to Teddy G. Brown, Trustee & Lawana R. Brown, Trustee, P.O. Box 443, Hurst, Illinois 62949. The site consists of four parcels: 01-07-403-001, 01-07-406-001, 01-07-406-002, 01-07-406-003 (containing approximately 19.67 acres). An adjoining parcel 01-07-405-005 (containing 1.15 acres) is owned by T & T Recycling, Inc., 16917 Route 149, Hurst, Illinois 62949. T & T Recycling, Inc. is registered with the Illinois Secretary of State and their status is listed as active.

Summary of Apparent Violations:

21(k)	848.202(c)(2)	848.204(c)(1)	12(d)	21(p)(6)
55(a)(4)	848.203(a)	848.204(c)(2)	21(a)	55(k)(1)
55(c)	848.203(b)	848.204(c)(3)	21(d)(2)	722.111
55(d)(1)	848.203(d)	848.302(a)	21(e)	808.121
55(e)	848.203(e)	848.601(a)	21(p)(1)	739.122(c)
55(g)	848.203(f)	9(a)	21(p)(2)	12(b)
55.6(b)	848.204(a)	9(c)	21(p)(3)	309.102(a)
848.202(c)(1)	848.204(b)	12(a)	21(p)(4)	

State of Illinois
ENVIRONMENTAL PROTECTION AGENCY
 Inspection Site Sketch

Date: December 12, 2012
 BOL ID #: 1990455003 – Williamson County
 Site Name: T & T Recycling, Inc.
 Inspector: Garrison Gross
 Not Drawn to Scale: All Locations Are Approximate





DIGITAL PHOTOGRAPHS



Date: 12/12/2012
Time: 9:52 A.M.
Direction: east
Photo by: Garrison Gross
Exposure #: 001
Comments: tire storage
area; tires outside and off
the rim

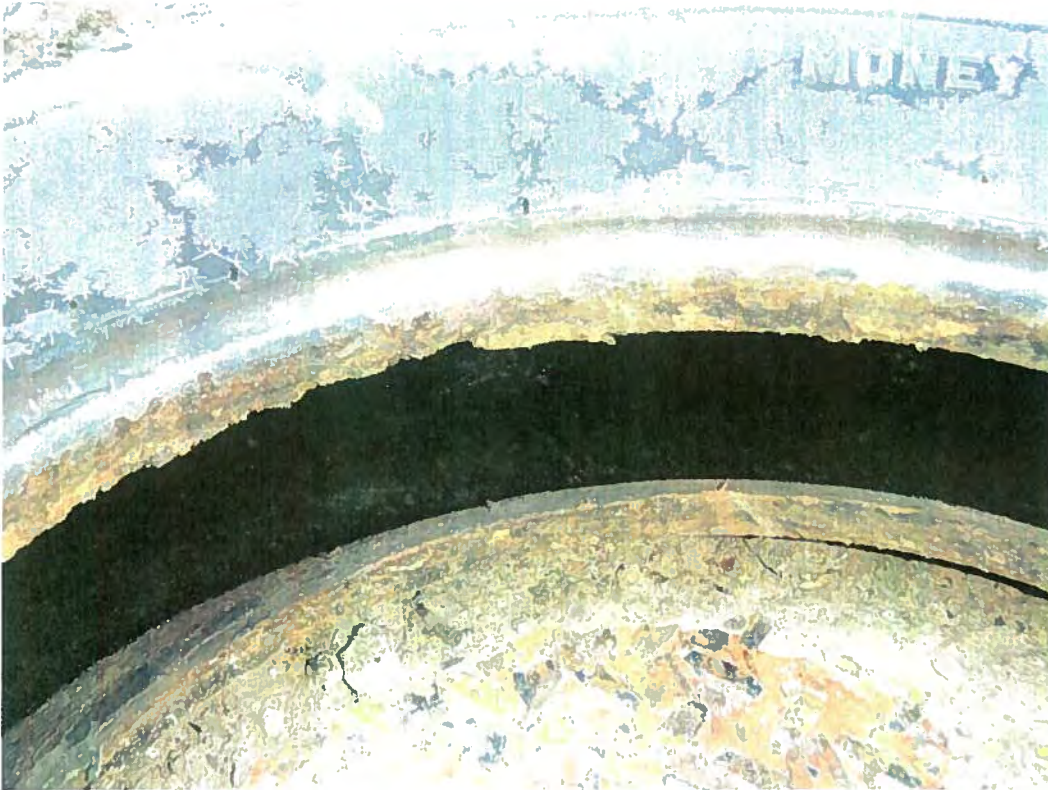


Date: 12/12/2012
Time: 9:52 A.M.
Direction: east
Photo by: Garrison Gross
Exposure #: 002
Comments: tire storage
area

File Names: 1990455003~12122012-[001-020].jpg



DIGITAL PHOTOGRAPHS



Date: 12/12/2012
Time: 9:54 A.M.
Direction: down
Photo by: Garrison Gross
Exposure #: 003
Comments: water in tires
(partially frozen)



Date: 12/12/2012
Time: 9:59 A.M.
Direction: east
Photo by: Garrison Gross
Exposure #: 004
Comments: spillage of
automotive fluids onto
ground

File Names: 1990455003~12122012-[001-020].jpg



DIGITAL PHOTOGRAPHS



Date: 12/12/2012
Time: 10:00 A.M.
Direction: down
Photo by: Garrison Gross
Exposure #: 005
Comments: holes in
dumpster used to store
vehicle engines and
transmissions



Date: 12/12/2012
Time: 10:00 A.M.
Direction: west
Photo by: Garrison Gross
Exposure #: 006
Comments: spillage of
automotive fluids onto
ground

File Names: 1990455003~12122012-[001-020].jpg



DIGITAL PHOTOGRAPHS



Date: 12/12/2012
Time: 10:04 A.M.
Direction: north
Photo by: Garrison Gross
Exposure #: 007
Comments: spillage of
automotive fluids onto
ground and into
stormwater ditch



Date: 12/12/2012
Time: 10:04 A.M.
Direction: north
Photo by: Garrison Gross
Exposure #: 008
Comments: spillage of
automotive fluids onto
ground and into
stormwater ditch

File Names: 1990455003~12122012-[001-020].jpg



DIGITAL PHOTOGRAPHS



Date: 12/12/2012
Time: 10:05 A.M.
Direction: west
Photo by: Garrison Gross
Exposure #: 009
Comments: stormwater
leaving site; petroleum
sheen on water; litter in
water



Date: 12/12/2012
Time: 10:09 A.M.
Direction: east
Photo by: Garrison Gross
Exposure #: 010
Comments: used / waste
tires in scrap metal pile

File Names: 1990455003~12122012-[001-020].jpg



DIGITAL PHOTOGRAPHS



Date: 12/12/2012
Time: 10:09 A.M.
Direction: down
Photo by: Garrison Gross
Exposure #: 011
Comments: mud and
water in used / waste tire



Date: 12/12/2012
Time: 10:11 A.M.
Direction: north
Photo by: Garrison Gross
Exposure #: 012
Comments: spillage of
automotive fluids from
vehicle engines

File Names: 1990455003~12122012-[001-020].jpg



DIGITAL PHOTOGRAPHS



Date: 12/12/2012
Time: 10:11 A.M.
Direction: down
Photo by: Garrison Gross
Exposure #: 013
Comments: spillage of
automotive fluids



Date: 12/12/2012
Time: 10:11 A.M.
Direction: north
Photo by: Garrison Gross
Exposure #: 014
Comments: pile of
automotive salvage
residue

File Names: 1990455003~12122012-[001-020].jpg



DIGITAL PHOTOGRAPHS



Date: 12/12/2012
Time: 10:12 A.M.
Direction: north
Photo by: Garrison Gross
Exposure #: 015
Comments: pile of
automotive salvage
residue



Date: 12/12/2012
Time: 10:12 A.M.
Direction: west
Photo by: Garrison Gross
Exposure #: 016
Comments: evidence of
open burning and
scavenging

File Names: 1990455003~12122012-[001-020].jpg



DIGITAL PHOTOGRAPHS



Date: 12/12/2012
Time: 10:15 A.M.
Direction: southwest
Photo by: Garrison Gross
Exposure #: 017
Comments: evidence of
open burning and
scavenging



Date: 12/12/2012
Time: 10:19 A.M.
Direction: north
Photo by: Garrison Gross
Exposure #: 018
Comments: used oil; not
properly labeled

File Names: 1990455003~12122012-[001-020].jpg



DIGITAL PHOTOGRAPHS



Date: 12/12/2012
Time: 10:20 A.M.
Direction: south
Photo by: Garrison Gross
Exposure #: 019
Comments: used gasoline;
not properly labeled



Date: 12/12/2012
Time: 10:23 A.M.
Direction: west
Photo by: Garrison Gross
Exposure #: 020
Comments: universal
waste battery storage
area; not properly labeled

File Names: 1990455003~12122012-[001-020].jpg

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JAN 11 2013

STATE OF ILLINOIS
Pollution Control Board

PROOF OF SERVICE

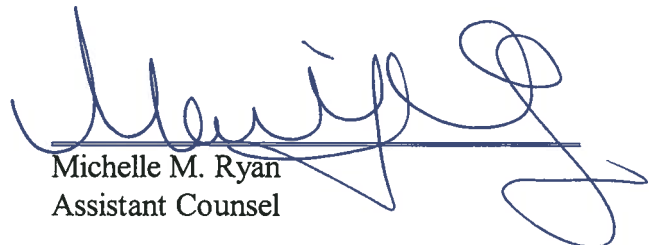
I hereby certify that I did on the 8th day of January 2013, send by Certified Mail, Return Receipt Requested, with postage thereon fully prepaid, by depositing in a United States Post Office Box a true and correct copy of the following instrument(s) entitled ADMINISTRATIVE CITATION, AFFIDAVIT, and TIRE STORAGE SITE INSPECTION CHECKLIST

To: Teddy G. Brown, Trustee
Lawana R. Brown, Trustee
P.O. Box 443
Hurst, IL 62949

T & T Recycling, Inc.
ATTN: Ted Brown
16917 State Highway 149
P.O. Box 443
Hurst, IL 62949

and the original and nine (9) true and correct copies of the same foregoing instruments on the same date by Certified Mail, Return Receipt Requested, with postage thereon fully prepaid

To: John Therriault, Clerk
Pollution Control Board
James R. Thompson Center
100 West Randolph Street, Suite 11-500
Chicago, Illinois 60601



Michelle M. Ryan
Assistant Counsel

Illinois Environmental Protection Agency
1021 North Grand Avenue East
P.O. Box 19276
Springfield, Illinois 62794-9276
(217) 782-5544

THIS FILING SUBMITTED ON RECYCLED PAPER