



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

2009 MALL STREET, COLLINSVILLE, ILLINOIS 62234

THOMAS V. SKINNER, DIRECTOR

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

November 2, 2000

CERTIFIED MAIL #7099 3400 0002 6815 3463
RETURN RECEIPT REQUESTED

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

Re: Violation Notice, L-2000-01302
#1894925001 -- Washington County
Prior Oil Company
Compliance File

Dear Mr. Prior :

This constitutes a Violation Notice pursuant to Section 31(a)(1) of the Illinois Environmental Protection Act, 415 ILCS 5/31(a)(1), and is based upon an inspection completed on August 22, 2000 by a representative of the Illinois Environmental Protection Agency ("Illinois EPA").

The Illinois EPA hereby provides notice of violations of environmental statutes, regulations, or permits as set forth in Attachment A to this letter. Attachment A includes an explanation of the activities that the Illinois EPA believes may resolve the specified violations, including an estimate of a reasonable time period to complete the necessary activities. Due to the nature and seriousness of the violations cited, please be advised that resolution of the violations may require the involvement of a prosecutorial authority for purposes that may include, among others, the imposition of statutory penalties.

A written response, which may include a request for a meeting with representatives of the Illinois EPA, must be submitted via certified mail to the Illinois EPA within 45 days of receipt of this letter. The response must address each violation specified in Attachment A and include for each an explanation of the activities that will be implemented and the time schedule for the completion of that activity. The written response will constitute a proposed Compliance Commitment Agreement ("CCA") pursuant to Section 31 of the Act. The Illinois EPA will review the proposed CCA and will accept or reject it within 30 days of receipt.

If a timely written response to this Violation Notice is not provided, it shall be considered to be a waiver of the opportunity to respond and to meet and the Illinois EPA may proceed with a referral to the prosecutorial authority.

**PEOPLE'S
EXHIBIT**

3

PLB.02177

#1894925001 -- Washington County
Prior Oil Company

Page 2

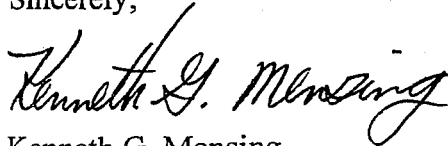
Written communications should be directed to:

Illinois EPA
Attn: Kenneth Mensing
2009 Mall Street
Collinsville, Illinois 62234

All communications must include reference to this **VIOLATION NOTICE NUMBER, L-2000-01302.**

Questions regarding this matter should be directed to **CHRIS CAHNOVSKY** at **618/346-5120.**

Sincerely,

A handwritten signature in cursive script that reads "Kenneth G. Mensing".

Kenneth G. Mensing
Regional Manager
Bureau of Land

KGM:CNC:cas
Attachment

bcc: BOL - Records Unit
bcc: DLC - Chris Perzan
bcc: DLC - Todd Retting
bcc: BOL - Collinsville

1894925001 -- Washington County
Prior Oil Company

ATTACHMENT A

1. Pursuant to Section 21(a) of the [Illinois] Environmental Protection Act (415 ILCS 5/21(a)), no person shall cause or allow the open dumping of any waste.

A violation of Section 21(a) of the [Illinois] Environmental Protection Act (415 ILCS 5/21(a)) is alleged for the following reason: **Evidence of open dumping of waste was observed during the inspections.**

2. Pursuant to Section 21(d) of the [Illinois] Environmental Protection Act (415 ILCS 5/21(d)), no person shall conduct any waste-storage, waste-treatment, or waste-disposal operation:

1. Without a permit granted by the Agency or in violation of any conditions imposed by such permit, including periodic reports and full access to adequate records and the inspection of facilities, as may be necessary to assure compliance with this Act and with regulations and standards adopted thereunder...

2. In violation of any regulations or standards adopted by the Board under this Act.

This subsection (d) shall not apply to hazardous waste.

A violation of Section 21(d) of the [Illinois] Environmental Protection Act (415 ILCS 5/21(d)) is alleged for the following reason: **Waste was disposed without a permit granted by the Illinois EPA.**

3. Pursuant to Section 21(e) of the [Illinois] Environmental Protection Act (415 ILCS 5/21(e)), no person shall dispose, treat, store or abandon any waste, or transport any waste into this State for disposal, treatment, storage or abandonment, except at a site or facility which meets the requirements of this Act and of regulations and standards thereunder.

A violation of Section 21(e) of the [Illinois] Environmental Protection Act (415 ILCS 5/21(e)) is alleged for the following reason: **Waste was disposed at this site which does not meet the requirements of the Act and regulations thereunder.**

4. Pursuant to Section 21(p)(1) & (6) of the [Illinois] Environmental Protection Act (415 ILCS 5/21(p)), no person shall, in violation of subdivision (a) of this Section[21], cause or allow the open dumping of any waste in a manner which results in litter and standing or flowing liquid discharge from the dump site.

The prohibitions specified in this subsection (p) shall be enforceable by the Agency either by administrative citation under Section 31.1 of this Act or as otherwise provided by this Act. The specific prohibitions in this subsection do not limit the power of the Board to establish regulations or standards applicable to open dumping.

A violation of Section 21(p)(1) & (6) of the [Illinois] Environmental Protection Act (415 ILCS 5/21(p)(1) & (6)) is alleged for the following reason: **Evidence of open dumping of waste was observed during the inspections. Liquid crude oil was observed in a pit on Prior Oil Company's property.**

5. Pursuant to 35 Ill. Adm. Code 722.111, a person who generates a solid waste, as defined in Section 721.102, must determine if that waste is a hazardous waste using the following method:
- a) The person should first determine if the waste is excluded from regulation under 35 Ill. Adm. Code 721.104.
 - b) The person should then determine if the waste is listed as a hazardous waste in 35 Ill. Adm. Code 721.Subpart D.

Board Note: Even if a waste is listed, the generator still has an opportunity under 35 Ill. Adm. Code 720.122 to demonstrate that the waste from the generator's particular facility or operation is not a hazardous waste.

- c) For purposes of compliance with 35 Ill. Adm. Code 728, or if the waste is not listed as a hazardous waste in 35 Ill. Adm. Code 721.Subpart D the generator shall then determine whether the waste is identified in 35 Ill. Adm. Code 721.Subpart C by either:

- 1) Testing the waste according to the methods set forth in 35 Ill. Adm. Code 721.Subpart C, or according to an equivalent method approved by the Board under 35 Ill. Adm. Code 720.121; or
- 2) Applying knowledge of the hazard characteristic of the waste in light of the materials or the processes used.
- d) If the generator determines that the waste is hazardous, the generator shall refer to 35 Ill. Adm. Code 724, 725 and 728 for possible exclusions or restrictions pertaining to the management of the specific waste.

A violation of 35 Ill. Adm. Code 722.111 is alleged for the following reason: **Prior Oil Company failed to make a hazardous waste determination of the two drums of used oil on the side of the southwest side of the shop.**

6. Pursuant to 35 Ill. Adm. Code 739.122(c), containers and aboveground tanks used to store used oil at generator facilities must be labeled with the words "Used Oil".

A violation of 35 Ill. Adm. Code 739.122(c) is alleged for the following reason: **Prior Oil Company failed to label the two drums of used oil on the southwest side of the shop with the words "Used Oil".**

7. Pursuant to 35 Ill. Adm. Code 739.122(d), upon detection of a release of used oil to the environment, a generator shall perform the following cleanup steps:
 - 1) Stop the release;
 - 2) Contain the released used oil;
 - 3) Clean up and properly manage the released used oil and other material; and
 - 4) If necessary, prevent further releases, repair or replace any leaking used oil storage containers or tanks prior returning them to service.

A violation of 35 Ill. Adm. Code 739.122(d) is alleged for the following reason: **Oil was observed on the ground around the two drums of used oil on the southwest side of the Shop.**

8. Pursuant to 35 Ill. Adm. Code 808.121(a), Each person who generates waste shall determine whether the waste is a special waste.

A violation of 35 Ill. Adm. Code 808.121(a) is alleged for the following reason: **Prior Oil Company failed to make a special waste determination of the two drums of used oil on the side of the southwest side of the shop.**

SUGGESTED RESOLUTIONS

1. **IMMEDIATELY** cease all open dumping.
2. **IMMEDIATELY** label all containers of used oil with the words "Used Oil."
3. **IMMEDIATELY** begin cleaning up the released oil from the two drums of used oil on the southwest side of the shop. The oil contaminated soil must be taken to a permitted landfill. A special waste manifest must be used to accompany the load to the landfill.
4. By December 14, 2000 submit what steps Prior Oil Company has taken to clean up the crude oil in the pit. Once this waste is no longer a liquid, it may be disposed of as a special waste in a permitted landfill. A special waste manifest must be used to accompany the load to the landfill.
5. By December 14, 2000 conduct a hazardous waste determination of the two drums of used oil on the southwest side of the shop. This determination must at a minimum consist of an analysis for flash point (SW846 Method 1010).
6. All waste must be removed from the site by December 14, 2000.

The written response to this Violation Notice must include information in rebuttal, explanation, or justification of each alleged violation. The written response must also include a proposed Compliance Commitment Agreement that commits to specific remedial actions, includes specified times for achieving each commitment, and may include a statement that compliance has been achieved.

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

Open Dump Inspection Checklist

County: Washington LPC#: 1894925001 Region: Collinsville

Location/Site Name: Prior Oil Company

Date: August 22, 2000 Time: From 12:00 To 13:00 Previous Inspection Date: _____

Inspector(s): Chris Cahnovsky Weather: 82° F hot

No. of Photos Taken: # 13 Est. Amt. of Waste: 20 yds³ Samples Taken: Yes# X No _____

Interviewed: John Prior Complaint #: _____

Responsible Party
Mailing Address(es)
and Phone Number(s):

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

	SECTION	DESCRIPTION	VIOL.
ILLINOIS ENVIRONMENTAL PROTECTION ACT REQUIREMENTS			
1.	9(a)	CAUSE, THREATEN OR ALLOW AIR POLLUTION IN ILLINOIS	
2.	9(c)	CAUSE OR ALLOW OPEN BURNING	
3.	12(a)	CAUSE, THREATEN OR ALLOW WATER POLLUTION IN ILLINOIS	
4.	12(d)	CREATE A WATER POLLUTION HAZARD	
5.	21(a)	CAUSE OR ALLOW OPEN DUMPING	X
6.	21(d)	CONDUCT ANY WASTE-STORAGE, WASTE-TREATMENT, OR WASTE- DISPOSAL OPERATION:	
	(1)	Without a Permit	X
	(2)	In Violation of Any Regulations or Standards Adopted by the Board	X
7.	21(e)	DISPOSE, TREAT, STORE, OR ABANDON ANY WASTE, OR TRANSPORT ANY WASTE INTO THE STATE AT/TO SITES NOT MEETING REQUIREMENTS OF ACT AND REGULATIONS	X
8.	21(p)	CAUSE OR ALLOW THE OPEN DUMPING OF ANY WASTE IN A MANNER WHICH RESULTS IN ANY OF THE FOLLOWING OCCURRENCES AT THE DUMP SITE:	
	(1)	Litter	X
	(2)	Scavenging	
	(3)	Open Burning	
	(4)	Deposition of Waste in Standing or Flowing Waters	
	(5)	Proliferation of Disease Vectors	
	(6)	Standing or Flowing Liquid Discharge from the Dump Site	X
	(7)	Deposition of General Construction or Demolition Debris; or Clean Demolition Debris	

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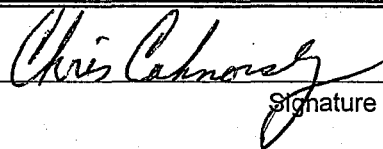
RELEASABLE

NOV 22 2000

(Open Dump - 1)

REVIEWER MD

9.	55(a)	NO PERSON SHALL:	
	(1)	Cause or Allow Open Dumping of Any Used or Waste Tire	
	(2)	Cause or Allow Open Burning of Any Used or Waste Tire	
35 ILLINOIS ADMINISTRATIVE CODE REQUIREMENTS SUBTITLE G			
10.	812.101(a)	FAILURE TO SUBMIT AN APPLICATION FOR A PERMIT TO DEVELOP AND OPERATE A LANDFILL	
11.	722.111	HAZARDOUS WASTE DETERMINATION	X
12.	808.121	SPECIAL WASTE DETERMINATION	X
13.	809.302(a)	ACCEPTANCE OF SPECIAL WASTE FROM A WASTE TRANSPORTER WITHOUT A WASTE HAULING PERMIT, UNIFORM WASTE PROGRAM REGISTRATION AND PERMIT AND/OR MANIFEST	
OTHER REQUIREMENTS			
14.		APPARENT VIOLATION OF: () PCB; () CIRCUIT COURT CASE NUMBER: ORDER ENTERED ON:	
15.	739.122(c)	CONTAINERS USED TO STORE USED OIL MUST BE LABELED WITH THE WORDS "USED OIL"	X
	739.122(d)	UPON DETECTION OF A RELEASE OF USED OIL TO THE ENVIRONMENT, A GENERATOR SHALL PERFORM CLEANUP STEP PROVIDED IN THIS SUBSECTION	X



Signature of Inspector(s)

Informational Notes

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

1894925001 -- Washington County
Prior Oil Company
Date of Inspection: August 22, 29 and 31, 2000
Prepared by: Chris Cahnovsky

NARRATIVE

On August 22, 2000, while investigating an unrelated complaint in Wamac, Illinois, I entered property owned by John Prior, Prior Oil Company. This property is at 140 Gompers Street and is the location of Prior Oil Company's office, shop and equipment storage. I entered the property from a field to the north. I observed a large pit containing waste and an oily liquid. This pit was 25 feet long by 10 feet wide by about seven feet deep. The pit contained an old BBQ grill, car parts, plastic containers, paint cans, cloths, used oil absorbent pads and landscape waste. In the pit I observed a large amount of oil. I observed oil pooled on the bottom of the pit and oil coating the side walls of the pit. There was a large concentration of oil in the deepest part of the pit covering an area about seven feet by ten feet.

I proceeded to the office and met Mr. John Prior. Mr. Prior and I walked back to the pit. I asked Mr. Prior what he knows about the pit and the oil in the pit. He stated he had no idea, none. He went on to say the he does not know who put the waste in the pit. He stated he did not know the pit was there. I asked if this was crude oil. Mr. Prior stated that he does not think it is crude oil because it is too black. Mr. Prior claimed that one of the neighbors or Harold Alexander dumped the oil on his property.

Mr. Prior said he would immediately begin cleaning up the pit. I stated that the waste must be dug out and taken to a landfill. Mr. Prior wanted to begin the removal the next day. I stated that he may want to wait until I have a chance to sample the oil in the pit. He claimed that he is about to sell his tractor and will not have access to it anymore so he wanted to begin right away. I told him I wanted to be present for the removal. We arranged to meet at the site at 9:00 a.m. on August 24, 2000.

Tom Miller and I returned to this site on August 23, 2000 to obtain a sample of the oil in the pit. No one representing Prior Oil Company was present during this sampling inspection. The sample was labeled X201. I observed that the pool of oil in the pit was about eight to ten inches deep and had a kerosine like odor.

Sample X201 was taken using a 32-ounce glass jar. The sample was placed into two 2-ounce, one 32-ounce and one 9-ounce glass jar. The sample was placed in a cooler of "blue ice" and transported to the Collinsville Regional Office. In Collinsville, the samples were sealed with evidence tape and repacked for shipment to the IEPA's Springfield Organics laboratory. The requested analysis were flash point, PCB, TCLP volatile organics and TCLP semi-volatile organics. A request was also made to compare the sample against crude oil standards to determine if the oil was crude oil or used motor oil.

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IEPA-DLPC

On August 24, 2000, Mr. Prior called to inform me that he would not be able to remove the waste because the area had received an inch of rain overnight. He said he would call me when he would begin excavation. John Senjan and I returned to the site on August 29, 2000. The pit has remained unchanged since my August 22, 2000, inspection. I spoke with Mr. Prior during this inspection and he told me he would begin excavation on August 31, 2000. He also told me that he had the pit dug over one month ago to bury concrete. I did not observe any concrete in the ditch.

Mr. Prior called me on August 30, 2000 and told me that he had dug out the ditch yesterday and today. He stated that he had the equipment and the manpower on hand and did the work. I asked if the waste was still on-site. Mr. Prior stated that it was still on-site in a lined roll-off box. I told Mr. Prior that I had received some preliminary lab results and that the material in the box may be a hazardous waste. I explained that he should not move the box until I received all of the analysis back from the lab. He agreed not to move the box until I had the lab results.

On August 31, 2000, I conducted an inspection at this site. No one was present. I observed that the waste had been removed from the pit. I observed a 20-yd³ roll off-box of oily contaminated dirt. The box was on the back of a truck. The name on the side of the truck was H&H Ship Service Co. San Francisco, CA USDOT 193737.

On the southwest side of the shop, I observed two 30-gallon drums of used oil. Neither drum was labeled used oil. Also, a large amount of oil was observed on the top of the drums and on the ground around the drums. I went in the office and informed Prior Oil employee, Jenni Dining, that the oil drums were leaking and the released oil must be cleaned up. I told her that the oil contaminated soil could probably go into the roll-off box of oil contaminated soil. She stated she would tell the guys in the shop.

The Collinsville Office received the laboratory results of October 27, 2000. The laboratory report for the oil in the pit shows that the oil appears to match the pattern of crude oil and not used motor oil. Pursuant to 35 Ill. Adm. Code 721.104(b)(5) drilling fluids, produced water and other waste associated with the exploration, development or production of crude oil are solid wastes. This oily waste in the pit would also meet the definition of special waste.

SUMMARY OF APPARENT VIOLATIONS

1. 21(a) - causing or allowing the open dumping of waste.
2. 21(d) - disposing of waste with out a permit
3. 21(e) - disposing of waste at a site that is not in compliance
4. 21(p)(1)(6) - open dumping and standing liquid discharge from a dump site.
5. 722.111 - Haz determination of used oil by the shop
6. 808.121(a) - Special waste determination of the used oil by the shop
7. 739.122(c) - no label on drums of used oil
8. 739.122(d) - used oil on ground



THE ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF LAND POLLUTION
RECEIPT FOR SAMPLES

Site Inventory #: 1894925001 Facility Name: Prior Oil Company
Federal I.D. #: N/A County: Washington

Sample #:	Consisting of the Indicated # of Bottles	Date Collected
<u>X201</u>	<u>4</u>	<u>8/23/00</u>
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

Duplicate Samples requested: ☐ Yes ☒ No

Receipt for samples listed above is hereby acknowledged.

<u>X John Prior / Jenni Auning</u>		<u>8-23</u>
Signature Owner/Operator/Agent	Title	Date
<u>Ch. Kelly</u>	<u>EPS</u>	<u>8/23/00</u>
Agency Representative	Title	Date

COMMENTS: TCLP VOC + SVOC Flash + PCB

NOTE: White Copy - Division File
Yellow Copy - Regions
Pink Copy - Owner/Operator/Agent

GS:TH:lh:AC-XI

ORGANIC BOTTLES

CONSTITUENT	PWELL	GWOT	GWDIS	SURFW	TOTL1 TOTL2 TOTL3 TOTL4	TCLP1 TCLP2	VOC Volatiles by GC/MS F=Focused subset Method 8260 (soils, 5035) D=Drinking Water subset by GC Method 502.1	SVOC Semivolatiles by GC/MS F=Focused subset Method 8270	Test	Bottles Required (by Matrix)										
										Water	Soil	Organic								
Alkalinity	310.2'	310.2'	310.2'	310.2'	—	—	1,1-Dichloroethane	FD	1,2-Dinitrobenzene	Benzo(b)fluoranthene	F	VOC	(2) 40 ml vials+blank	(3) EnCore™ tubes	(1) 2 oz jar					
Aluminum	200.7'	6010A	6010A	200.7'	6010A	1, 2, 3, 4	1,1,2,2-Tetrachloroethane	D	1,2,4,5-Tetrachlorobenzene	Benzo(g,h,i)perylene	F	FOC VOC	(2) 40 ml vials+blank	(3) EnCore™ tubes	(1) 2 oz jar					
Ammonia-Nit.	350.1'	350.1'	350.1'	350.1'	—	—	1,1,2-Trichloroethane	D	1,4-Dinitrobenzene	Benzo(k)fluoranthene	F	VOC/GC	(2) 40 ml vials+blank	N/A	N/A					
Antimony	—	7041	7041	—	7041	1, 2, 3, 4	1,1,1-Trichloroethane	FD	1,3-Dinitrobenzene	Benzo(a)anthracene	F	SVOC	(1) 80 oz bottle ^{1,2}	(1) 8 oz jar ¹	(1) 8 oz jar					
Arsenic	—	7060	7060	—	7060	1, 2, 3, 4	1,1,1,2-Tetrachloroethane	D only	2,2'-Oxybis-1-chloropropane	Benzyl Alcohol	F	FOC SVOC	(1) 80 oz bottle ^{1,2}	(1) 8 oz jar ¹	(1) 8 oz jar					
Barium	200.7'	6010A	6010A	200.7'	6010A	1, 2, 3, 4	1,2-Dichlorobenzene	D only	2,3,4,6-Tetrachlorophenol	Bis (2-ethylhexyl) Phthalate	F	PEST/ECOD ¹	(1) 80 oz bottle ^{1,2}	(1) 8 oz jar ¹	(1) 8 oz jar					
Beryllium	200.7'	6010A	6010A	200.7'	6010A	1, 2, 3, 4	1,2-Dichloropropene	D only	4-Chlorophenylphenylether	Bis (2-chloroethyl) Ether	F	FOC PEST/ECOD ¹	(1) 80 oz bottle ^{1,2}	(1) 8 oz jar ¹	(1) 8 oz jar					
Boron	200.7'	6010A	6010A	200.7'	6010A	1, 2, 3, 4	1,2,3-Trichloropropene	D	4-Nitrophenol	Bis (2-chloroisopropyl) Ether	F	PEST/NPD ¹	(1) 80 oz bottle ^{1,2}	(1) 8 oz jar ¹	(1) 8 oz jar					
Cadmium	200.7'	6010A	6010A	200.7'	6010A	1, 2, 3, 4	1,3-Dichlorobenzene	D only	5-Nitro-o-toluidine	Bis (2-chloroisopropyl) Ether	F	FOC PEST/NPD ¹	(1) 80 oz bottle ^{1,2}	(1) 8 oz jar ¹	(1) 8 oz jar					
Calcium	200.7'	6010A	6010A	200.7'	6010A	1, 2, 3, 4	1,3-Dichloropropene	D only	7,12-Dimethylbenzo(a)anthracene	Benzyl Benzyl Phthalate	F	PCB ¹	(1) 80 oz bottle ^{1,2}	(1) 8 oz jar ¹	(1) 8 oz jar					
Chloride	325.2'	9251	9251	325.2'	—	—	1,4-Dichlorobenzene	D only	Chrysene	Chrysene	F	HERB/ECOD	(1) 80 oz bottle ^{1,2}	(1) 8 oz jar ¹	(1) 8 oz jar					
Chromium	200.7'	6010A	6010A	200.7'	6010A	1, 2, 3, 4	1,1-Dichloropropene	D	Di-n-butylphthalate	TOXAPHENE	F	TOXAPHENE	(1) 80 oz bottle ^{1,2}	(1) 8 oz jar ¹	(1) 8 oz jar					
Cobalt	200.7'	6010A	6010A	200.7'	6010A	1, 2, 3, 4	1,2-Dichloroethane	FD	Di-n-octylphthalate	TCLP VOC	F	TCLP VOC	(4) 40 ml vials+ blank	(8) EnCore™ tubes	(2) 2 oz jars					
Copper	200.7'	6010A	6010A	200.7'	6010A	1, 2, 3, 4	1,1-Dichloroethane	D	Dibenz(a,h)anthracene	TCLP SVOC	F	TCLP SVOC	(1) 80 oz bottle ^{1,2}	(1) 8 oz jar ¹	(1) 8 oz jar					
Cyanide	335.4'	9010A	—	335.4'	9010A	3, 4	1,4-Dichlorobenzene	D only	Dibenzofuran	TCLP PEST	F	TCLP PEST	(1) 80 oz bottle ^{1,2}	(1) 8 oz jar ¹	(1) 8 oz jar					
Fluoride	432785'	432785'	—	432785'	—	—	2,2-Dichloropropene	D	Diethylphthalate	TCLP HERB	F	TCLP HERB	(1) 80 oz bottle ^{1,2}	(1) 8 oz jar ¹	(1) 8 oz jar					
Hardness	200.7'	—	—	200.7'	—	—	2-Chloroethylvinyl Ether	D	Dimethylphthalate	FUEL ID	F	FUEL ID	(1) 80 oz bottle ^{1,2}	(1) 8 oz jar ¹	(1) 8 oz jar					
Iron	—	7421	7421	—	7421	1, 2, 3, 4	2-Hexanone (MIBK)	—	Ethylmethanesulfonate	HPLC PNA (TACO)	F	HPLC PNA (TACO)	(1) 80 oz bottle ^{1,2}	(1) 8 oz jar ¹	N/A					
Lead	—	7421	7421	—	7421	1, 2, 3, 4	4-Methyl-2-pentanone (MIBK)	—	Fluoranthene	FLASH	F	FLASH	N/A	N/A	(1) 8 oz jar					
Magnesium	200.7'	6010A	6010A	200.7'	6010A	1, 2, 3, 4	Acetone	—	Fluorene	PAINTFILTER	F	PAINTFILTER	N/A	N/A	(1) 8 oz jar					
Manganese	200.7'	6010A	6010A	200.7'	6010A	1, 2, 3, 4	Benzene	F	Hexachlorobenzene	pH	F	pH	Any Container	Any Container	Any Container					
Mercury	245.1'	7470A	7470A	245.1'	7470A	1, 2, 3, 4	Bromobenzene	D	Hexachlorocyclopentadiene	Footnotes:										
Nickel	200.7'	6010A	6010A	200.7'	6010A	1, 2, 3, 4	Bromochloromethane	D	Hexachloroethane	'For the cleanest sample, collect 2 extra bottles for QA/QC										
Nitrite/Nitrate	353.2'	353.2'	353.2'	—	353.2'	—	Bromophenol	D	Hexachloropropene											
pH	150.1'	9040A	—	150.1'	9040A	3, 4	Carbon Disulfide	FD	Indeno(1,2,3-CD)pyrene											
Phenols	420.4'	9066	—	420.4'	9066	3, 4	Carbon Disulfide	FD	Isophorone											
Phosphorus	365.1'	365.1'	—	365.1'	—	—	Carbon Disulfide	FD	Isosaffrole											
Potassium	200.7'	6010A	6010A	200.7'	6010A	1, 2, 3, 4	Chlorobenzene	D	Methylmethanesulfonate											
Selenium	—	7740	7740	—	7740	1, 2, 3, 4	Chlorodibromomethane	D	n-Nitroso-di-n-propylamine											
Silver	200.7'	6010A	6010A	200.7'	6010A	1, 2, 3, 4	Chloroethane	FD	n-Nitrosopiperidine											
Sodium	200.7'	6010A	6010A	200.7'	6010A	1, 2, 3, 4	Chloroform	FD	o-Anisidine											
Sp. Cond.	—	9050	—	—	9050	—	Chloromethane	FD	o-Toluidine											
Strontium	200.7'	6010A	6010A	200.7'	6010A	1, 2, 3, 4	Cis-1,2-Dichloroethylene	FD	Naphthalene											
Sulfate	375.2'	9036	9036	375.2'	—	—	Cis-1,3-Dichloropropene	D	Nitrobenzene											
Sulfide	—	7841	7841	—	7841	3, 4	Dibromomethane	D	4-Chlorophenyl Phenyl Ether											
Thallium	—	—	—	—	—	—	Dichlorobromomethane	D	4-Nitrophenol											
TDS/ROE	160.1'	160.1'	—	160.1'	—	—	Dichlorobenzene	FD	4-Nitrophenol											
TSS	—	—	—	—	—	—	Dichlorobenzene	FD	4-Nitrophenol											
TOC	200.7'	6010A	6010A	200.7'	6010A	3, 4	Dichlorobenzene	FD	4-Nitrophenol											
Vanadium	200.7'	6010A	6010A	200.7'	6010A	1, 2, 3, 4	Dichlorobenzene	FD	4-Nitrophenol											
Zinc	200.7'	6010A	6010A	200.7'	6010A	1, 2, 3, 4	Dichlorobenzene	FD	4-Nitrophenol											
1200.8' for cleaner samples; 200.9' for more concentrated ones. #6020 for cleaner samples; indicated method for more concentrated ones. EPA 600/4-79-020 EPA 600/R-94/111 USGS							Numbers 1-4 correspond to groups TOTL1 through TOTL4. For example, TOTL1 contains all constituents that have a 1 listed after them, TOTL2 contains all constituents with a 2 listed after them, etc.		TCLP extraction by Method 1311, then analyzed by indicated method. *Mercury is 7470A for aqueous, 7471A for non-aqueous.			Bottle Descriptions: (All are glass except EnCore™) *40 ml vial, polypropylene cap with Teflon-lined Septum, 5 drops 50% i/ci *80 oz or 1 gallon, polypropylene cap w/Teflon liner *2 oz, polypropylene cap w/Teflon liner *8 oz, polypropylene cap w/Teflon liner *16 oz, polypropylene cap w/Teflon liner *32 oz, polypropylene cap w/Teflon liner *5 g carbon polymer EnCore™ tube Metric Conversion: 40 ml = 1.35 oz								
INORGANIC PARAMETER GROUP DESCRIPTIONS PWELL: Private wells, total inorganics. Bottles: Cyanide, Metals (8 oz), Nutrients, Phenol, Unpreserved (16 oz) Total volume: 44 oz. GWOT: Groundwater monitoring wells, total inorganics. Bottles: Cyanide, Metals (32 oz), Nutrients, Phenol, Unpreserved (16 oz) Total volume: 66 oz. GWDIS: Groundwater monitoring wells, dissolved inorganics. Bottles: Metals (32 oz), Nutrients, Unpreserved (16 oz). Total volume: 52 oz. SURFW: Surface waters and leachate flows and seeps, total inorganics. Bottles: Cyanide, Metals (8 oz), Nutrients, Phenol, Sulfide, Unpreserved (64 oz). Total volume: 122 oz. TOTL1: Aqueous wastes, wastewaters & leachate collection system samples, total metals. Bottles: Metals (32 oz). Total volume: 32 oz. TOTL2: Waste, soil, sediment, sludge, and organic matrices, total metals. Bottles: Glass bottle (16 oz) [from Springfield Laboratory]. Total volume: 16 oz. TOTL3: Aqueous wastes, wastewaters & leachate collection system samples, total inorganics. Bottles: Cyanide, Metals (32 oz), Nutrients, Phenol, Sulfide, Unpreserved (16 oz). Total volume: 98 oz. TOTL4: Waste, soil, sediment, sludge, and organic matrices, total inorganics. Bottles: Glass bottle (16 oz) [from Springfield Laboratory]. Total volume: 16 oz. TCLP1: Aqueous wastes, wastewaters & leachate collection system samples, TCLP metals. Bottles: Unpreserved (32 oz). Total volume: 32 oz. TCLP2: Waste, soil, sediment, sludge, and organic matrices, TCLP metals. Bottles: Glass bottle (16 oz) [from Springfield Laboratory]. Total volume: 16 oz. AWAST (same as TOTL3 + TCLP1): Bottles: Cyanide, Metals (32 oz), Nutrients, Phenol, Sulfide, Unpreserved (64 oz). Total volume: 146 oz. SWAST (same as TOTL4 + TCLP2): Bottles: Glass bottle (16 oz) [from Springfield Laboratory]. Total volume: 16 oz.							OTHER TESTS BOD (32 oz) — 405.1' TURBIDITY (50 ml) — 180.1' pH (50 ml) — 9040A SP. CONDUCTANCE (50 ml) — 9050 SP. GRAVITY (32 oz) — D1298-67 Run from unpreserved PE bottles; volume required listed after test name. EPA 600/4-79-020 SW-846 ANSI/ASTM		INORGANIC BOTTLES CYANIDE: 8 oz PE, 1.25 ml 5N NaOH METALS: 32 oz PE, 20 ml 50% HNO ₃ METALS: 8 oz PE NUTRIENTS: 4 oz PE, 1.25 ml 20% H ₂ SO ₄ PHENOL: 6 oz glass, 1.8 ml 20% H ₂ SO ₄ SULFIDE: 32 oz PE, 2 ml 2N Zn(CH ₃ COO) ₂ ·H ₂ O UNPRESERVED: 16, 32, or 64 oz PE PE = Polyethylene bottle glass = glass bottle caps = polypropylene w/pulp & Saran liner except Nutrient (unlined)		PEST/ECOD Routine Pesticides/Herbicides by Electron Capture Detector F=Focused subset Method 8081A Aldrin Aldrin Aldrin α-BHC γ-BHC (Lindane) Captan α-Chlordane γ-Chlordane Cyazinyl Dieldrin Endrin Heptachlor Epoxide Heptachlor Hexachlorobenzene Methoxychlor Metolachlor Metribuzin P.P.-DOE P.P.-DDO P.P.-DDT Pendimethalin Trifluralin		PEST/NPD Routine Pesticides/Herbicides by Nitrogen Phosphorous Detector F=Focused subset Method 8141A Atrazine Butylate Chlorpyrifos Diazinon EPTC Fenofos Malathion Methyl Parathion Phorate Terbufos HERB Phenoxy Herbicides by Electron Capture Detector Method 8151A 2,4-D 2,4,5-TP (Silvex) Dalapon Dicamba Dinoseb Picloram		OTHER TESTS TCLP VOC—1311+8260 TCLP SVOC—1311+8270 TCLP PEST—1311+8081A TCLP HERB—1311+8151A PCB—8082 pH—9040A FLASHPOINT—1010 PAINTFILTER—9095 FUEL ID—1651 TOXAPHENE—8091A Special Pesticides (request by pesticide name)			Brief Instructions for the Chain of Custody Document 1. Do not write in any areas totally shaded in gray. These are FOR USE ONLY. (Areas for which part of the heading is shaded but the rest is not shaded ARE intended for FOS to write in; the shaded heading merely alerts the lab to input data from this area.) 2. Complete form heading information: indicate funding code, comp file heading, indicate project manager (head sampler, who needs to receive the results) name, address, and phone number, circle or write receiving laboratory information, and indicate case number if this is criminal investigation. 3. In column heading areas under "Parameter Group and other analysis list the parameter groups or other tests which will be requested. ("Focused" Organics are for screening purposes only, not compliance/enforcement.) List list each sample, one per row, under Sample #. Then for each sample (row), check the required group or indicate whether the sample was split with the facility and whether it must be retained after analysis for evidentiary purposes, indicate the number of bottles submitted and the volume in ounces for the sample. Complete "Date Collected and Sealed" through "Collector or Laboratory Comments." "Collector or Laboratory Comments" may be used by th or FOS for miscellaneous comments. If more space is needed, attach separate sheet of paper. 4. For the "Receipt for Samples" section, circle "y" or "n" to indicate whether splits were offered and/or accepted, then have the facility representative sign and put his/her title and the date in the indicated space. 5. Complete "Samplers," "Sealer," and "Carriers" sections. If the sample to be shipped, the last custodian relinquishing prior to shipping should do the "To container for shipment" box.		

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

AMPLE NUMBER : D009949

AMPLING POINT DESC. : X201/WASHINGTON/WAMAC/PRIOR OIL COMPANY

SUBMITTING SOURCE # :

SITE # :

DATE COLLECTED : 000823

TIME COLLECTED : 1200

SAMPLING PROGRAM :

COLLECTED BY : C.C.

DELIVERED BY : UPS

COMMENTS : TCLP VOC/SVOC/FLASHPOINT/PCB/LEGAL HOLD RUSH ON FLASHPOINT

FINDING CODE : LP41

AGENCY ROUTING : --

UNIT CODE :

M TYPE CODE :

SAMPLE PURPOSE CODE : F REPORTING INDICATOR : B

DATE RECEIVED : 000824

TIME RECEIVED : 0900

RECEIVED BY : MAH

OBSERVATIONS : 1-160Z/1-80Z/2-20Z

TRIP BL SAM# :

SUPERVISORS INITIALS : CMC

NOTE : K = LESS THAN VALUE

8300 FLASH POINT DEG.F : 139

39519 TOTAL PCBS

UG/G : 1.0K

74694 PHENOL

UG/G : 130K

4273 BIS(2-CHLOROETHYL)ETHER

UG/G : 130K

34586 2-CHLOROPHENOL

UG/G : 130K

4566 1,3-DICHLOROBENZENE

UG/G : 130K

4571 1,4-DICHLOROBENZENE

UG/G : 130K

77147 BENZYL ALCOHOL

UG/G : -----

4536 1,2-DICHLOROBENZENE

UG/G : 130K

00000 2-METHYLPHENOL

UG/G : 130K

74283 BIS(2-CHLOROISOPROPYL)ETHER

UG/G : -----

0000 4-METHYLPHENOL

UG/G : 130K

54428 N-NITROSO-DI-N-PROPYLAMINE

UG/G : 130K

4396 HEXACHLOROETHANE

UG/G : 130K

4447 NITROBENZENE

UG/G : 130K

34408 ISOPHORONE

UG/G : 130K

4591 2-NITROPHENOL

UG/G : 130K

34606 2,4-DIMETHYLPHENOL

UG/G : 130K

77247 BENZOIC ACID

UG/G : -----

4278 BIS(2-CHLOROETHOXY)METHANE

UG/G : 130K

34601 2,4-DICHLOROPHENOL

UG/G : 130K

4551 1,2,4-TRICHLOROBENZENE

UG/G : 130K

4696 NAPHTHALENE

UG/G : 130K

00000 4-CHLOROANILINE

UG/G : 130K

74391 HEXACHLOROBUTADIENE

UG/G : 130K

34452 4-CHLORO-3-METHYLPHENOL

UG/G : 130K

77416 2-METHYLNAPHTHALENE

UG/G : 130K

4386 HEXACHLOROCYCLOPENTADIENE

UG/G : 430K#

4621 2,4,6-TRICHLOROPHENOL

UG/G : 130K

RECEIVED
IEPA

OCT 27 2000

COLLINSVILLE OFFICE

77687	2,4,5-TRICHLOROPHENOL	UG/G : 130K
4581	2-CHLORONAPHTHALENE	UG/G : 130K#
00000	2-NITROANILINE	UG/G : 130K
34341	DIMETHYLPHTHALATE	UG/G : 130K
4200	ACENAPHTHYLENE	UG/G : 130K
34626	2,6-DINITROTOLUENE	UG/G : 130K
8300	3-NITROANILINE	UG/G : 130K
4205	ACENAPHTHENE	UG/G : 130K
34616	2,4-DINITROPHENOL	UG/G : 1300K#
4646	4-NITROPHENOL	UG/G : 130K
01302	DIBENZOFURAN	UG/G : 130K
34611	2,4-DINITROTOLUENE	UG/G : 130K
4336	DIETHYLPHTHALATE	UG/G : 130K
34641	4-CHLOROPHENYL PHENYL ETHER	UG/G : 130K
4381	FLUORENE	UG/G : 130K
0000	4-NITROANILINE	UG/G : 130K
00000	4,6-DINITRO-2-METHYLPHENOL	UG/G : 430K
4636	4-BROMOPHENYL PHENYL ETHER	UG/G : 130K
9700	HEXACHLOROBENZENE	UG/G : 130K
39032	PENTACHLOROPHENOL	UG/G : 430K#
4461	PHENANTHRENE	UG/G : 130K
34220	ANTHRACENE	UG/G : 130K
9110	DI-N-BUTYLPHTHALATE	UG/G : 130K
4376	FLUORANTHENE	UG/G : 130K
34469	PYRENE	UG/G : 130K
4292	BUTYL BENZYL PHTHALATE	UG/G : 130K
4631	3,3'-DICHLOROBENZIDINE	UG/G : 130K
34526	BENZO(A)ANTHRACENE	UG/G : 130K
4320	CHRYSENE	UG/G : 130K
39100	BIS(2-ETHYLHEXYL)PHTHALATE	UG/G : 130K
34596	DI-N-OCTYLPHTHALATE	UG/G : 130K#
4230	BENZO(B)FLUORANTHENE	UG/G : 130K#
34242	BENZO(K)FLUORANTHENE	UG/G : 130K
4247	BENZO(A)PYRENE	UG/G : 130K
4403	INDENO(1,2,3-CD)PYRENE	UG/G : 130K#
34556	DIBENZO(AH)ANTHRACENE	UG/G : 130K#
4521	BENZO(GHI)PERYLENE	UG/G : 130K#

#ACCEPTABLE QUALITY CONTROL COULD NOT BE OBTAINED FOR THIS ANALYTE.

THIS SAMPLE WAS ANALYZED AFTER THE 30-DAY HOLDING PERIOD.

FILE NUMBER : D009949

34418 CHLOROMETHANE	UG/G : 0.45K
34413 BROMOMETHANE	UG/G : 0.45K
39175 VINYL CHLORIDE	UG/G : 0.45K
34311 CHLOROETHANE	UG/G : 0.45K
34423 METHYLENE CHLORIDE	UG/G : 1.1K
31552 ACETONE	UG/G : 2.2K
34488 TRICHLOROFLUOROMETHANE	UG/G : 0.45K
77277 BROMOCHLOROMETHANE	UG/G : 0.45K
77041 CARBON DISULFIDE	UG/G : 0.45K
34501 1,1-DICHLOROETHYLENE	UG/G : 0.45K
34496 1,1-DICHLOROETHANE	UG/G : 0.45K
34546 TRANS-1,2-DICHLOROETHYLENE	UG/G : 0.45K
7093 CIS-1,2-DICHLOROETHYLENE	UG/G : 0.45K
72106 CHLOROFORM	UG/G : 0.45K
34531 1,2-DICHLOROETHANE	UG/G : 0.45K
81595 2-BUTANONE(MEK)	UG/G : 0.45K
34506 1,1,1-TRICHLOROETHANE	UG/G : 0.45K
32102 CARBON TETRACHLORIDE	UG/G : 0.45K
46491 METHYL TERT BUTYL ETHER	UG/G : 0.45K
32101 DICHLOROBROMOMETHANE	UG/G : 0.45K
34541 1,2-DICHLOROPROPANE	UG/G : 0.45K
34704 CIS-1,3-DICHLOROPROPENE	UG/G : 0.45K
39180 TRICHLOROETHYLENE	UG/G : 0.45K
32105 CHLORODIBROMOMETHANE	UG/G : 0.45K
34511 1,1,2-TRICHLOROETHANE	UG/G : 0.45K
8124 BENZENE	UG/G : 0.45K
34699 TRANS-1,3-DICHLOROPROPENE	UG/G : 0.45K
34576 2-CHLOROETHYL VINYL ETHER	UG/G : 0.45K
32104 BROMOFORM	UG/G : 0.45K
78133 4-METHYL-2-PENTANONE(MIBK)	UG/G : 0.45K
7103 2-HEXANONE(MBK)	UG/G : 2.2K#
34475 TETRACHLOROETHYLENE	UG/G : 0.45K
34516 1,1,2,2-TETRACHLOROETHANE	UG/G : 0.45K
8131 TOLUENE	UG/G : 0.64
34301 CHLOROBENZENE	UG/G : 0.45K
78113 ETHYLBENZENE	UG/G : 1.4
7128 STYRENE	UG/G : 0.45K
81551 XYLENE	UG/G : 7.7
ISOPROPYLBENZENE	UG/G 2.8

QUANTITATION IS APPROXIMATE.

NO TCLP COMPOUND ABOVE REGULATORY LIMITS

AMPLE NUMBER : D009949

- DETECTED IN TOTAL SAMPLE ANALYSIS.
- THE FOLLOWING QUANTITATIONS ARE APPROXIMATE
- 2,4,6-TRIBROMOPHENOL# UG/G: 790

- MISC. PNAS UG/G: 4300
- ALIPHATIC HYDROCARBONS UG/G: 42000
- OTHER ORGANIC COMPOUNDS UG/G: 15000
- #TENTATIVE IDENTIFICATION

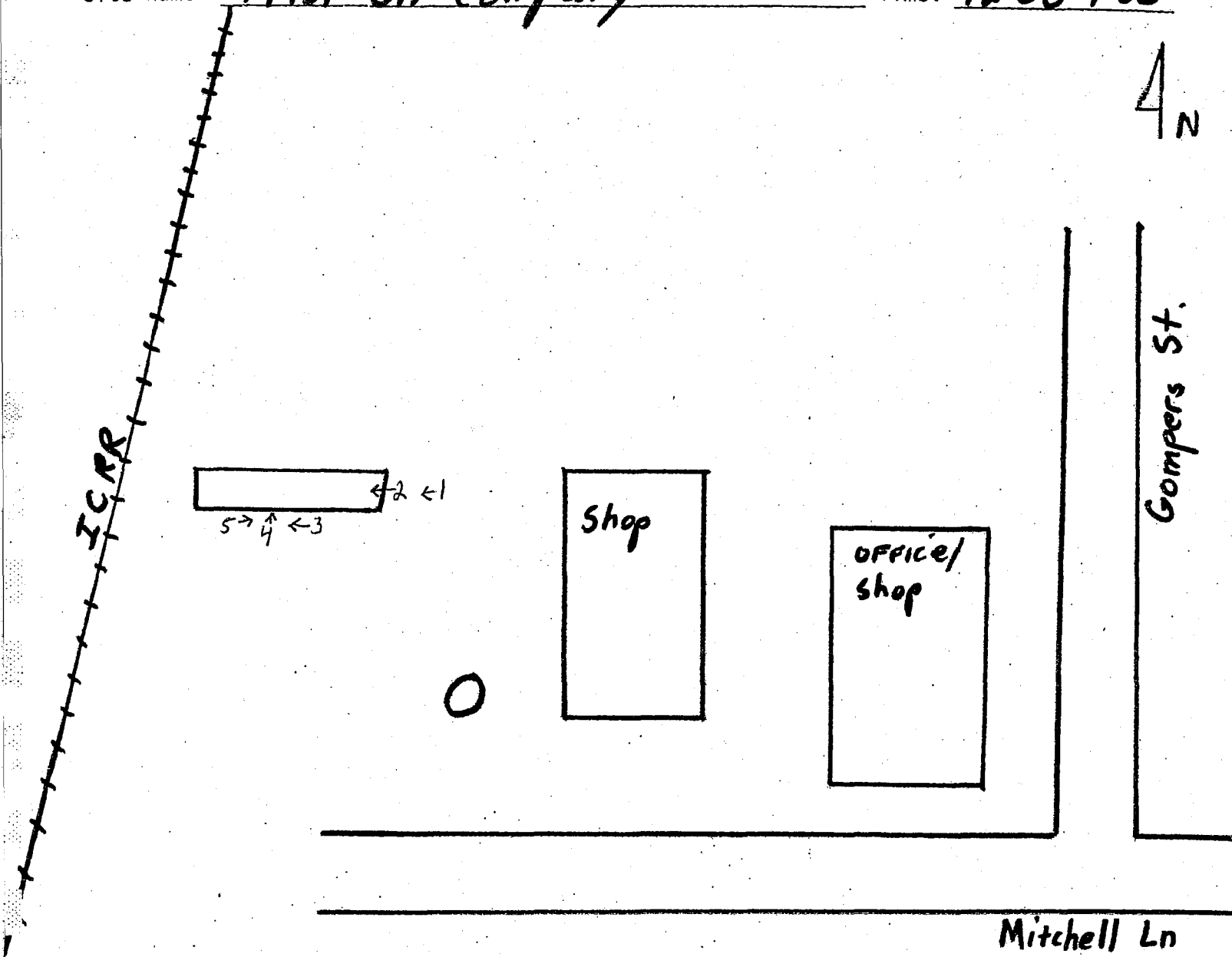
- SAMPLE RE-RELEASED FOLLOWING INITIAL
- COMPLETION DUE TO LATE ARIVAL OF CRUDE
- OIL STANDARD FROM CHEMICAL STANDARD SUPPLIER
- - SAMPLE PATTERN APPEARS TO MATCH PATTERN OF
- CRUDE OIL STANDARD.

CMC
CS

STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY

SITE SKETCH

Date of Inspection: 08/22/2000 Inspector: Chris Cahnovsky
Site Code: 1894925001 County: Washington
Site Name: Prior Oil Company Time: 12:00-1:00



1894925001 – Washington County
Prior Oil Company
FOS

DIGITAL PHOTOGRAPH PHOTOCOPIES

Date: August 22, 2000
Time: 12:00-13:00
Direction: West
Photo by: Chris Cahnovsky
Photo Number:
1894925001~08222000-001



Date: August 22, 2000
Time: 12:00-13:00
Direction: West
Photo by: Chris Cahnovsky
Photo Number:
1894925001~08222000-002



1894925001 – Washington County
Prior Oil Company
FOS

DIGITAL PHOTOGRAPH PHOTOCOPIES

Date: August 22, 2000
Time: 12:00-13:00
Direction: West
Photo by: Chris Cahnovsky
Photo Number:
1894925001~08222000-003



Date: August 22, 2000
Time: 12:00-13:00
Direction: North
Photo by: Chris Cahnovsky
Photo Number:
1894925001~08222000-004



1894925001 – Washington County
Prior Oil Company
FOS

DIGITAL PHOTOGRAPH PHOTOCOPIES

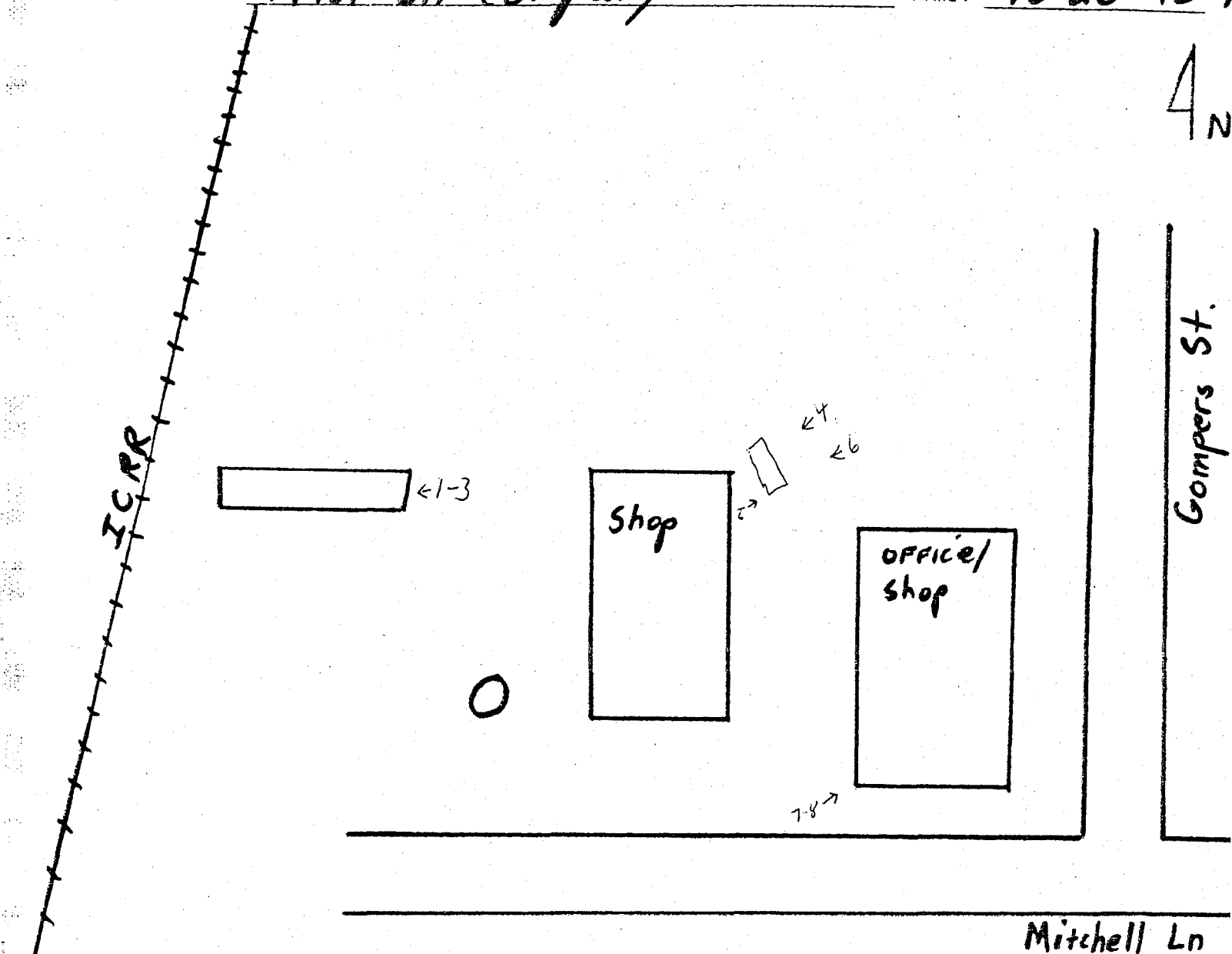
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Time: 12:00-13:00
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Photo Number:
1894925001~08222000-005



STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY

SITE SKETCH

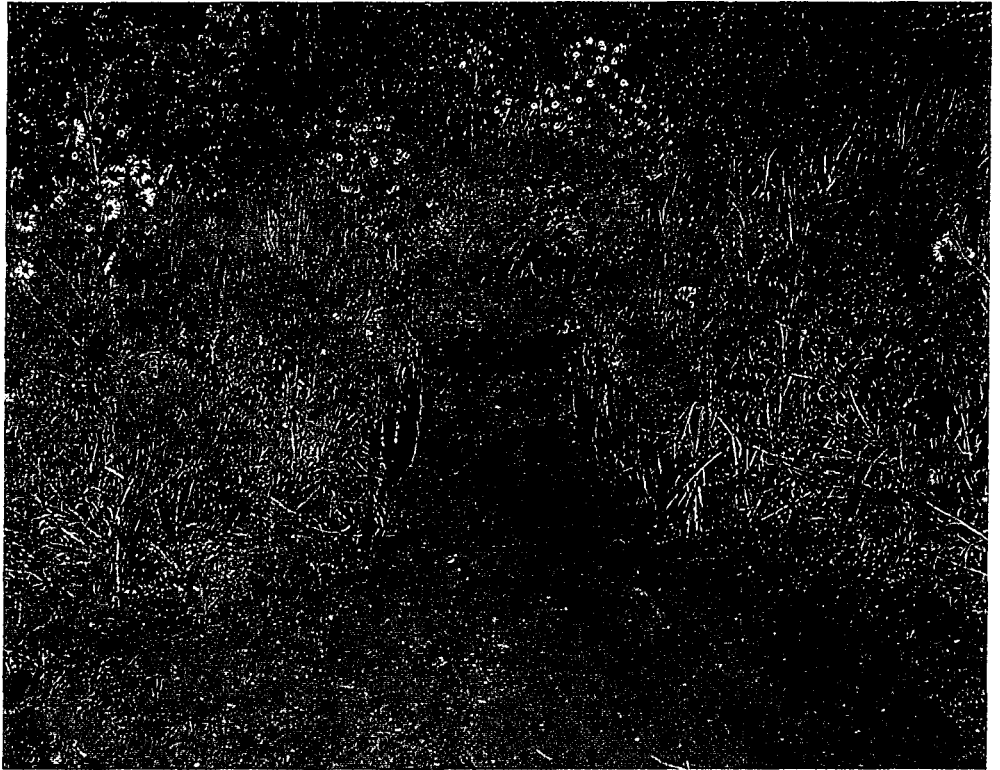
Date of Inspection: 08/31/2000 Inspector: Chris Cahnowsky
Site Code: 1894925001 County: Washington
Site Name: Prior Oil Company Time: 10:20-10:4



1894925001 – Washington County
Prior Oil Company
FOS

DIGITAL PHOTOGRAPH PHOTOCOPIES

Date: August 31, 2000
Time: 10:20-10:40
Direction: West
Photo by: Chris Cahnovsky
Photo Number:
1894925001~08312000-001



Date: August 31, 2000
Time: 10:20-10:40
Direction: West
Photo by: Chris Cahnovsky
Photo Number:
1894925001~08312000-002



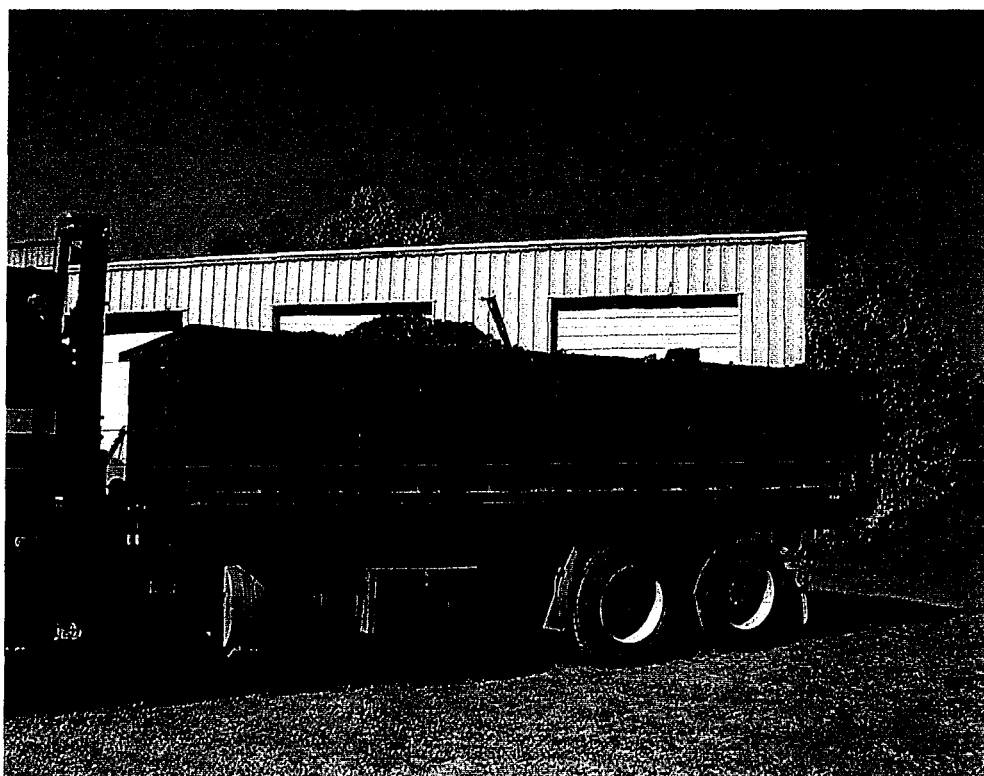
1894925001 – Washington County
Prior Oil Company
FOS

DIGITAL PHOTOGRAPH PHOTOCOPIES

Date: August 31, 2000
Time: 10:20-10:40
Direction: West
Photo by: Chris Cahnovsky
Photo Number:
1894925001~08312000-003



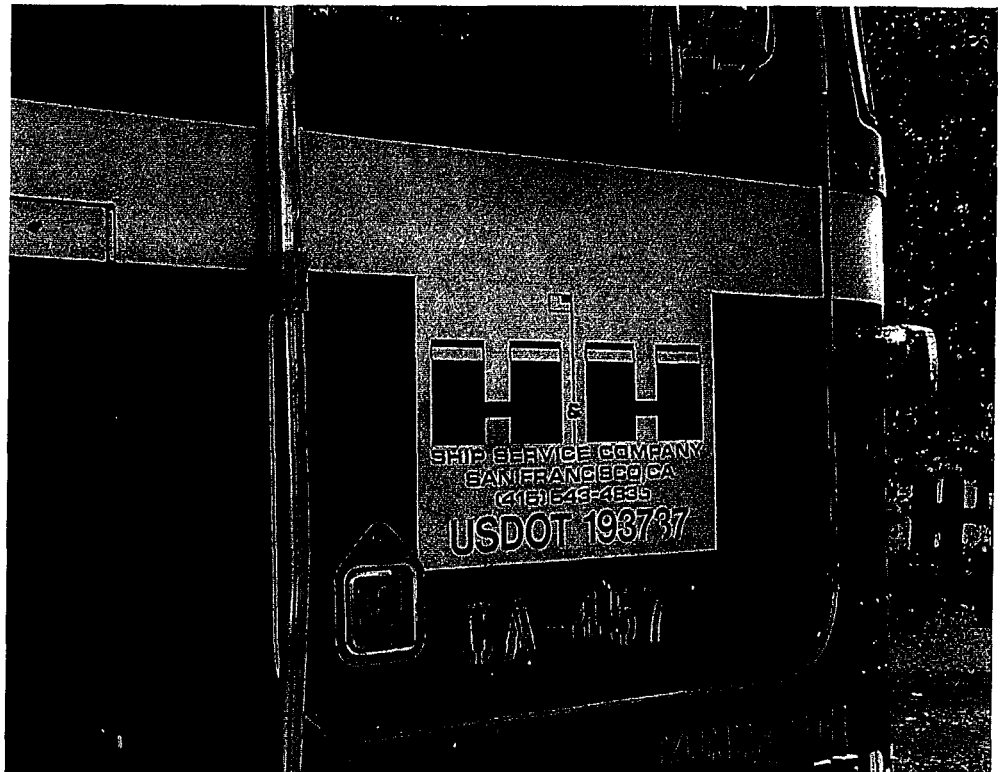
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1894925001~08312000-004



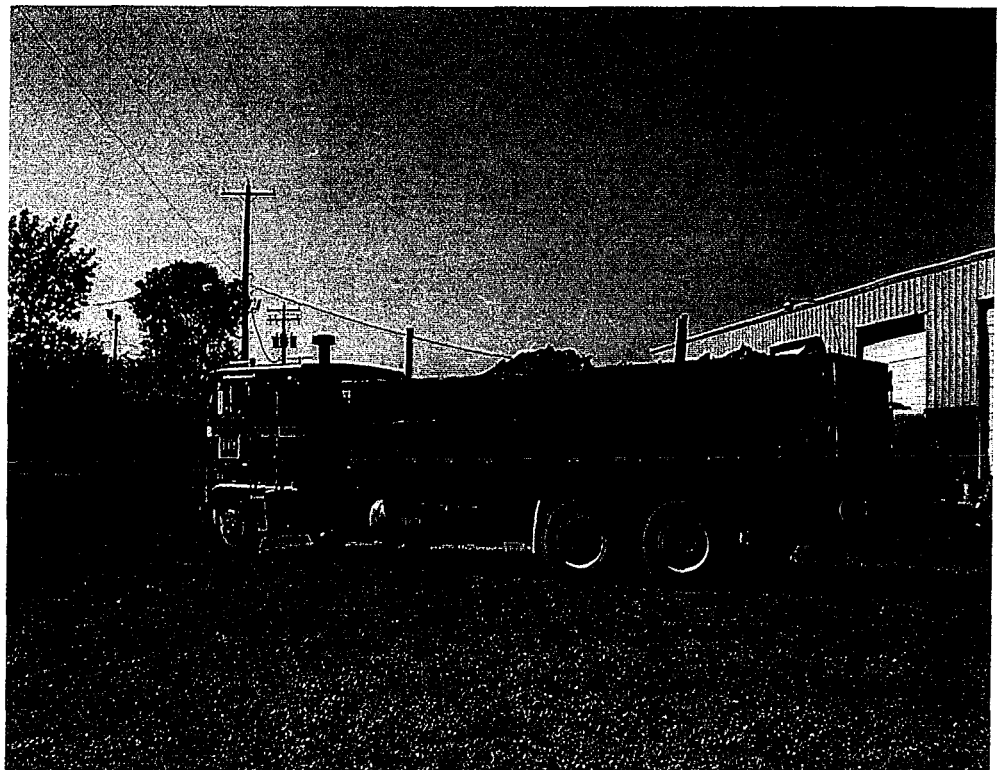
1894925001 – Washington County
Prior Oil Company
FOS

DIGITAL PHOTOGRAPH PHOTOCOPIES

Date: August 31, 2000
Time: 10:20-10:40
Direction: Northeast
Photo by: Chris Cahnovsky
Photo Number:
1894925001~08222000-005



Date: August 31, 2000
Time: 10:20-10:40
Direction: Southwest
Photo by: Chris Cahnovsky
Photo Number:
1894925001~08222000-006



1894925001 – Washington County
Prior Oil Company
FOS

DIGITAL PHOTOGRAPH PHOTOCOPIES

Date: August 31, 2000
Time: 10:20-10:40
Direction: Northeast
Photo by: Chris Cahnovsky
Photo Number:
1894925001~08222000-007



Date: August 31, 2000
Time: 10:20-10:40
Direction: Northeast
Photo by: Chris Cahnovsky
Photo Number:
1894925001~08222000-008

