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BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

|                                     |   |                     |
|-------------------------------------|---|---------------------|
| IN THE MATTER OF:                   | ) |                     |
|                                     | ) |                     |
| PROPOSED AMENDMENTS TO THE          | ) | R06-20              |
| BOARD'S SPECIAL WASTE               | ) | (Rulemaking - Land) |
| REGULATIONS CONCERNING              | ) |                     |
| USED OIL, 35 ILL. ADM. CODE 808,809 | ) |                     |

NOTICE OF FILING

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Illinois Pollution Control Board  
James R. Thompson Center  
100 W. Randolph, Suite 11-500  
Chicago, Illinois 60601

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Deirdre K. Himer, Executive Director  
Illinois Environmental Regulatory Group  
3150 Roland Avenue  
Springfield, Illinois 62703

PLEASE TAKE NOTICE that I have today filed with the Office of the Clerk of the Illinois Pollution Control Board ADDITIONAL TESTIMONY OF THEODORE J. DRAGOVICH and TESTIMONY OF CHRISTOPHER N. CAHNOVSKY a copy of each of which is herewith served upon you

ILLINOIS ENVIRONMENTAL PROTECTION  
AGENCY

By: *Stephanie Flowers*  
Stephanie Flowers  
Assistant Counsel  
Division of Legal Counsel

DATE: *6-15-06*  
1021 North Grand Avenue East  
P.O. Box 19276  
Springfield, Illinois 62794-9276  
(217) 782-5544

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ADDITIONAL TESTIMONY OF THEODORE J. DRAGOVICH

My name is Theodore Dragovich. I am the manager of the Disposal Alternatives Unit in the Bureau of Land Permit Section of the Illinois Environmental Protection Agency ("Agency"). I was present and testified at the first hearing in this matter on May 25, 2006. At that hearing, the Illinois Pollution Control Board ("Board") requested that the Agency provide a response to questions raised by the Board's panel. I submit the following testimony in response to those inquiries and in response to the testimony of NORA at the May 25<sup>th</sup> hearing.

**1. Exempt only used oil or also materials regulated as used oil:**

The Agency believes that only used oil and not materials subject to regulation as used oil should be exempt from manifests. There are two main reasons for this decision: to encourage proper recycling and to insure proper management of wastes that are added to used oil.

As defined in 35 Ill. Adm. Code 739 ("Part 739"), used oil is oil that has been used and has been contaminated through use. Other materials that are added to used oil after it has been generated, that are not themselves used oil, do not become used oil, but become regulated as used oil because they contain used oil. These other wastes may exhibit characteristics different from used oil and may be managed differently when separate from used oil.

Part 739 was adopted by the Board in the identical in substance rulemaking of 40 CFR 279 ("Part 279"). The United States Environmental Protection Agency ("USEPA") formulated Part 279 to regulate as used oil materials that contain used oil or are contaminated with used oil until the free flowing oil is removed. USEPA considered this approach more restrictive since they do not regulate non-hazardous waste management prior to disposal.

USEPA in promulgating Part 279 acknowledged that the states may impose other regulations on both used oil and the used oil contaminated materials. Prior to the used oil regulations in Part 279 and Part 739, all nonhazardous pollution control wastes and industrial process wastes including used oil were regulated as special waste in Illinois. The USEPA Part 279 subjected non-hazardous material contaminated with used oil to federal regulation for the first time. Therefore, to exempt all materials regulated under Part 739 from special waste manifest and permitting requirements would reduce the regulatory requirements for special waste that has been mixed with used oil.

It is the Agency's belief that an exemption from manifest that is extended to materials regulated as used oil will lead to more waste being mixed with used oil after generation. Illinois has a system to regulate non-hazardous special waste transportation, storage treatment and disposal. These wastes are different from used oil as defined in Part 739 and the impact of managing these wastes solely as used oil has not been evaluated. Therefore the Agency does not believe it is appropriate to encourage mixing other wastes into used oil by offering a manifest exemption for the mixture. USEPA has identified the regulatory requirements for used oil mixed with hazardous waste, but the Agency has not evaluated the impact of regulating non-hazardous waste that has been mixed with used oil after generation solely under the used oil regulations. For these reasons, the Agency believes that other non-hazardous wastes mixed with used oil after

generation must be subject to both the used oil standards and the appropriate waste management standards that applied to the waste before the mixture occurred.

However, to clarify, materials that are added to the used oil that are not wastes would not become subject to the used oil manifesting or additional waste management requirements if the material is a fuel. NORA members testified that diesel fuel is sometimes added to the used oil by the generator. USEPA has previously concluded that the diesel fuel is not waste because it is a fuel and will still be used for a fuel after it is mixed with the used oil. (See the attached November 30, 1998, USEPA letter from Cotsworth to McPoland, RCRA Online Number 14305.) The Agency has also concluded that the used oil and diesel fuel mixture is regulated under Section 739.110(d) and not 35 Ill. Adm. Code 807 ("Part 807").

Furthermore, NORA members testified that it would be burdensome for the used oil transporter to determine if the used oil has been adulterated with other wastes. They concluded that all materials regulated as used oil should receive the exemption from manifest. However, it is the waste generators obligation to complete the manifest and provide it to the transporter and it is the generators responsibility to determine the type and quantity of the waste. NORA testified that it is not possible for the transporter to make a determination in the field if the used oil is adulterated after use. However, other than the rebuttable presumption at Section 739.144, nowhere in Part 739 or Part 809 does it require the transporter to determine if the used oil has been mixed with other waste. The generator will be responsible for completing a manifest when the generator mixes the used oil with other special waste that is not exempt from manifests. The manifest will alert the transporter that the used oil contains other special waste. Therefore, the Agency does not see that limiting the manifest exemption to used oil as defined in Part 739 as burdensome to the transporter.

Wastes are more amenable to recycling when they are segregated. USEPA made clear that they encourage the segregation of waste streams to make them more amenable for reclamation. (See 57 FR 41581 dated September 10, 1992.) In other words they do not encourage mixing other wastes into used oil destined for recycling. The USEPA regulations at Part 279 were designed to address used oil contaminated through use. (See 57 FR 41574 dated September 10, 1992.) The Agency believes it is likely that other waste added into the mixtures (e.g., inks, solvents and coolants) will not be recycled, but will be burned with the used oil or treated in a waste water treatment unit. Some of the wastes added to used oil which will be blended for fuel do not have fuel value themselves and may contain constituents that are not appropriate to burn in that setting. In the attached letter from Michael Shapiro to Douglas Green dated August 14, 1996, USEPA stated that oil contaminated materials must have a heating value of 5,000 BTUs to be burned for energy recovery. The Agency believes that if the other wastes are kept separate by the generator, the potential that these wastes will be recycled in an appropriate manner is higher.

In addition, NORA testified that material that is collected and ultimately sold for fuel is subject to more stringent testing and examination to find concentrations of materials that might be problematic. However, the used oil specification in Part 739 only establishes limits for arsenic, cadmium, chromium, lead, flash point and total halogens. Other constituents could be present in special waste that is not used oil that would be problematic when added to the used oil. These constituents could reduce viscosity or BTU content or increase ash content or emissions from burning the oil. Mixtures of used oil and other special waste that were subject to regulation as used oil could meet the specification in Part 739 for used oil and still not be marketable as a used oil fuel. Some examples of waste that have been mixed with used oil and managed under

Part 739 include: plastic pellets, carbon filter media, surfactants, water based paint, water based ink, emulsion solutions, grain/water/oil mixture, cleaning compound, sludge, wash water, super abrasive, sand tank sludge, water based coolants and barge bilge water.

There is a fundamental difference between exempting used oil as defined and managed in compliance with Part 739 and exempting materials subject to regulation under Part 739. This is because these materials are not used oil but are only subject to these regulations because they contain used oil. Used oil as defined in Part 739 includes the oil and the contaminants that are mixed with the oil during use. The Agency is concerned with other materials that are added to the used oil after it is generated. These materials may not behave like used oil and therefore the use of a manifest that accompanies the load would be beneficial to emergency response personnel and the end receiver of the materials. The used oil tracking system does not require that the shipping paper accompany the load. The Department of Transportation regulations only include requirements to manifest shipments of hazardous materials. Other shipping documents, such as a log or bill of lading that may be required by the Department of Transportation for shipments that are not hazardous materials may mislead the reader to believe that the cargo is only used oil when it could be mainly other wastes mixed with used oil.

In sum, the Agency's position is that the addition of other wastes to used oil after recycling should be discouraged because it makes the used oil and other waste less amenable to recycling. The exemption of these materials from the manifest and hauling requirements after mixing with used oil may, in fact, encourage this type of mixing. Other materials added to the used oil after generation should only be exempted from the manifest and hauling requirements if the exemptions currently existing in Sections 809.210 or 211 apply. The language proposed to

the Board by the Agency is still the best alternative and the Agency objects to the language proposed by NORA in the errata.

## **2. Language added to Sections 809.301, 302 and 501:**

The Board asked if the language added to Sections 809,301,302 and 501 creates the risk of doubt whether the eleven exemptions in Section 809.211 still apply to Sections 809,301,302 and 501. The Agency does not believe that adding this language will impact the other exemptions found in Part 809.

Used oil transporters may transport other special waste on the same load. This could occur in separate containers, separate compartments, or within the same compartment. Used oil transporters may also use the same truck to transport exclusively used oil on one load and at other times to transport other special wastes that are not regulated under Part 739. Therefore, the additional language in Sections 809.301, 302 and 501 is necessary to specify two separate exemptions, a manifest exemption and a hauling permit exemption. The manifest exemption will work independently from the hauling permit exemption because a generator would be exempt from initiating a manifest if the waste given to the transporter is only used oil as defined and managed in accordance with Part 739; the transporter would not be exempt from the hauling permit requirements unless all the loads that are picked up by that truck are used oil as defined and managed in accordance with Part 739. The transporter may choose to pick up other loads of non-exempt waste, but must have a haulers permit and a manifest for the non-exempt waste.

### 3. Quantity of manifests:

The Board asked the Agency to identify the number of manifests that were bought by used oil facilities. The Agency has identified the number of manifests purchased by facilities that notified of their used oil activity. The numbers provided may not be an accurate representation of the number of manifests that accompany used oil shipments for two reasons: the used oil notifiers may have used some of these manifests for the transportation of non-hazardous special waste that is not used oil; and the count does not include used oil generators that purchased their own manifests, but are not registered used oil facilities. With that in mind, the total number of manifests purchased from the Agency by registered used oil facilities was determined to be 525,824 in a two and one half year period or 210,330 manifests per year. Considering that some of the registered used oil facilities' main business is non-hazardous special waste other than used oil the Agency's best estimate is that of these 525,824 manifests about 168,650 manifests were purchased to transport used oil in a two and one half year period or 67,460 manifests per year. NORA may be able to provide better statistics on the percentage of waste managed by NORA members that is not regulated as used oil and also what percentage of NORA members' customers purchase their own manifests. It should also be noted that NORA testified to business growth of 25% per year. No growth factor has been included in these estimates. Therefore, the Agency estimates that the number of shipments of used oil that would be exempt from manifesting is about 67,460, but could be more than 210,330 shipments per year.



#### 4. Reporting requirements:

The Board also asked the Agency about the effect of an exemption on the reporting requirements. Although Section 739.157 requires processors to send a biennial report to USEPA concerning their used oil activities, the Agency relies on the annual non-hazardous special waste report in Section 809.501 to collect information on used oil. Pursuant to Section 809.501 generators that ship special waste out-of-state must provide an annual report of the waste they have shipped out-of-state. Also, treatment, storage and disposal facilities located in Illinois must submit a report to the Agency regarding special waste received at their facility and special waste shipped out-of-state from the facility. In the report, the generators and facilities designate the amount of used oil separately from other special waste. Therefore the Agency would maintain that any used oil exempt from manifesting as a result of this rule making is still subject to the annual reporting requirements of Section 809.501.

In addition, the Board asked the Agency if eliminating manifesting requirements will in any way frustrate recordkeeping efforts of the Agency under the special waste rules. If the Board expands the manifest exemption to materials regulated as used oil in Part 739 as NORA requests, there will be confusion as to the annual non-hazardous waste reporting requirements of Section 809.501 because it will be unclear whether the quantity of used oil that is reported is used oil as defined in Part 739 or the total quantity of special waste regulated as used oil. The used oil regulations do not specify a minimum amount of used oil that must be mixed with non-hazardous special waste before the non-hazardous special waste becomes subject to regulation as used oil, so the waste may be mainly waste that is not used oil as defined in Part 739. Limiting the manifest exemption to used oil as defined and managed in accordance with Part 739 as the Agency requests and maintaining the reporting requirements for used oil from Section 809.501

will establish a bright line where only used oil as defined in Part 739 would be reported as used oil, while all other non-hazardous special wastes would be reported together.

5. Manifest and tracking requirements for other states:

NORA testified that Illinois is the only state that classifies used oil as a special waste or requires generators to manifest used oil. A quick review of some other states used oil requirements indicates that the requirements do vary from state to state and some other states do have specific state hauling and recording keeping requirements, even though they do not designate the used oil as special waste. For instance, Alabama requires a hauler to have a Alabama Hazardous Waste and/or Used oil Transporter Permit (Ala. Adm. Code 335-14-17-.05), California requires a modified hazardous waste manifest (Health and Safety Code, Section 25250.8b), and Michigan requires a permitted transporter (Mich. Adm. Code R 299.9812) and a manifest (Mich. Adm. Code R 324.12103). Also, Missouri requires transporters to have a Missouri Hazardous Waste Transporter License and use a "Transporter's Used Oil Shipment Record" on forms provided by the state (10 CSR 25-11.279). New Hampshire requires that used oil be transported by a New Hampshire permitted hazardous waste transporter and be accompanied by a three-copy bill of lading (N.H. Adm. Code R. Env-Wm 807.07). Both New Jersey (N.J.A.C. 7:26A-6.6(g)) and South Carolina (SC ADC 61-107.279) require a manifest. And Wisconsin requires a used oil transporter to obtain a solid waste transportation license (NR. 590, Wis. Adm. Code).


The Agency acknowledges that regulation does vary by state but contends that Illinois is not the only state that has imposed more stringent transportation requirements. NORA has stated that all materials regulated as used oil should be included in the exemption to be consistent with

other states. But the regulations for the management of used oil are not consistent between other states, as just illustrated. The Agency supports the exemption from manifests and hauling permits for used oil that is defined and managed in accordance with Part 739, not because it will make the regulations consistent with other states, but because the used oil tracking and transportation requirements in Part 739 are adequate for the tracking and transportation of used oil as defined and managed in accordance with Part 739.

In addition, no detailed review has been conducted of the impact of exempting special waste from Parts 807, 808 and 809 when the waste is managed in accordance with Part 739 and the non-hazardous regulations do not contemplate the regulatory requirements for non-hazardous waste that is mixed with used oil and becomes subject to regulation as used oil. The wording proposed by NORA would exempt any non-hazardous waste once a small amount of used oil has been added to it. But the Agency insists that other non-hazardous special wastes be evaluated separately to determine if they should be exempted from hauling permits and manifests, not exempt because the waste was mixed with used oil and not because other states allow an exemption.

#### **6. Removal of Board note in Part 739:**

During the hearing, the Board asked NORA whether, in NORA's opinion, the Board Notes in Part 739 regarding state special waste hauling permits requirements would still apply. The note in question explains that generators of small quantity used oil that transport their own used oil or have a contractual hauler may still be subject to the hauling permit requirements in Part 809. Although NORA believed the note would become irrelevant, the Agency believes this note is still necessary because the used oil may be transported along with other special waste that is not used oil.

By   
Theodore J. Dragovich, P.E.

DATED: 6-15-06

Illinois Environmental Protection Agency  
1021 North Grand Avenue East  
P.O. Box 19276  
Springfield, IL 62794-9276



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460

10 1998

OFFICE OF  
SOLID WASTE AND EMERGENCY  
RESPONSE

Ms. Fran McPoland  
Federal Environmental Executive  
Office of the Federal Environmental Executive  
401 M Street SW (MC 1600)  
Washington, DC 20460

Dear Ms. McPoland:

Thank you for your letter regarding the regulatory status of used oil that is mixed with JP-8 fuel under the federal used oil management standards (40 CFR Part 279). You asked if JP-8 fuel mixed with used oil from military vehicles would meet the exemption at 40 CFR 279.10(d)(2) for mixtures of used oil and diesel fuel that are burned in a generator's own vehicles.

*Used Oil/Diesel Fuel Mixture Exemption*

The Used Oil Management Standards specifically exempt from the used oil regulations mixtures of used oil and diesel fuel on the conditions that (1) a used oil generator only mixes used oil that they generate on-site and (2) such mixtures are used as fuel in the generator's own vehicles (see 40 CFR 279.10(d)(2)). Prior to mixing, the used oil is subject to the used oil generator requirements of 40 CFR 279 subpart C.

*Used Oil/JP-8 Mixtures*

JP-8 is a multipurpose fuel similar to diesel fuel, and it is burned in diesel-type engines in military vehicles. Based on the information you provided, the U.S. Army is proposing to mix used oil they generate with JP-8 fuel and burn it in their own trucks in the same way that many trucking companies mix their used oil with diesel fuel to be burned in their own trucks. For the purposes of the exemption for used oil and diesel fuel mixtures, JP-8 can be considered to be analogous to diesel fuel. Therefore, mixtures of used oil and JP-8 are exempt from the used oil regulations if they are managed in accordance with 40 CFR 279.10(d)(2).

Faxback 14305

*Clean Air Act*

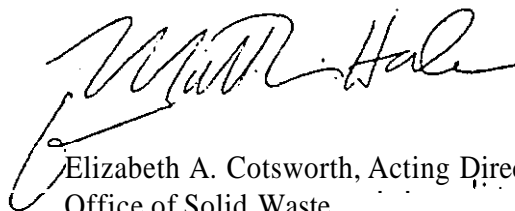
40 CFR 279.10(d)(2) excludes used oil and diesel fuel or JP-8 Fuel mixtures from only the Used Oil Management Standards. It does not preclude or supersede regulation under the Clean Air Act (CAA) or any other applicable laws. Please be aware that mixtures of used oil and JP-8 that are burned, and any engines or vehicles in which they are burned, are still subject to any applicable regulations promulgated under the CAA. Depending on how the mixture is accomplished, and by whom, sections 202(a)(4), 203, 206(a)(3)(b), and 211(a)-(f) of the CAA may place restrictions on such a practice as it relates to motor vehicles. For further information on these restrictions, please contact Mr. Bruce Fergusson ((202) 564-1261) or Mr. Rich Ackerman ((202) 564-1301) of the Office of Enforcement and Compliance (OECA) and/or Mr. David Kortum ((202) 564-9022) of the Office of Mobile Sources (OMS).

*State Specific Regulations*

States may adopt regulations that are more stringent than the federal used oil regulations. In fact, some states regulate used oil as hazardous waste and others do not allow burning of used oil. Many states also have comprehensive air quality programs that may restrict burning of used oil/JP-8 fuel mixtures. The Army should contact each state in which they would like to conduct used oil/JP-8 mixing for a state specific regulatory determination.

If you have any further questions about the Used Oil Management Standards, please contact Mike Swizzero, of my staff, at (703) 308-0046.

Sincerely,



Elizabeth A. Cotsworth, Acting Director  
Office of Solid Waste

cc: Paul Machiele, OMS  
Greg Orehowsky, OMS  
Jane Armstrong, OMS  
Dave Kortum, OMS  
Jim Caldwell, OMS  
Rich Ackerman, OECA  
Bruce Fergusson, OECA

PPC 9592.1996(04)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

OFFICE OF  
SOLID WASTE AND EMERGENCY RESPONSE

August 14, 1996

Douglas Green  
Piper and Marbury  
1200 Nineteenth St., NW  
Washington, D.C. 20035-2430

Dear Mr. Green:

This letter is in response to Edison Electric Institute's request for clarification of the applicability of the Used Oil Management Standards (Part 279) to materials that are contaminated with used oil and provide little or no energy when burned.

Unless burned for energy recovery, ~~materials contaminated with used oil are not covered under Part 279~~ if "the used oil has been properly drained or removed to the extent possible such that no visible signs of free-flowing oil remain in or on the material" (see, 40 CFR 279.10(c)). The recycling of any oil drained from the material is regulated under Part 279.

Contaminated materials (after draining) are regulated under Part 279 if the material is burned for energy recovery (see 40 CFR Part 279.10(c)(2)). For example, some sorbents have a high British thermal unit (BTU) value and once contaminated with used oil are managed by burning for energy recovery and, therefore, are regulated under Part 279. Contaminated materials (after draining) which provide little or no energy when burned, such as soil or clay-based sorbents, are not subject to Part 279. Whether a material is "burned for energy recovery" depends on the type of materials being burned and the combustion equipment being used. For purposes of the EPA regulations governing boilers and industrial furnaces, burning for energy recovery is limited to materials that have a heating value of at least 5,000 BTUs/pound (see, 40 CFR 266.100(c)(2)(ii); 56 FR 7134,7143, February

RO 14111

21,1991). EPA believes it is reasonable and consistent with the regulations to apply the same interpretation under Part 279. Of course, an authorized state may interpret what constitutes "burning for energy recovery" more stringently than EPA and that interpretation could be controlling to the extent that the state's used oil management standards are in effect (as distinguished from the federal used oil management standards set out at 40 CFR Part 279).

Any material from which free-flowing used oil has been drained and that is subject to a hazardous waste determination as described in 40 CFR Part 262.11 may therefore be subject to Resource Conservation and Recovery Act Subtitle C regulation as hazardous waste. Materials that do not meet the definition of hazardous waste may still be subject to other applicable Federal, State, and local solid waste regulations.

Thank you for your interest in the safe and proper management of used oil.

Sincerely,

Michael Shapiro, Director  
Office of Solid Waste

RO 14111



**BEFORE THE ILLINOIS POLLUTION CONTROL BOARD**

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**TESTIMONY OF CHRISTOPHER N CAHNOVSKY**

My name is Christopher Cahnovsky. I am Regional Manager for the Bureau of Land Collinsville, Illinois Regional Office. I have worked in this capacity since 2001. Previous to this position I was an Environmental Protection Specialist and Life Science Career Trainee for the Bureau of Land Collinsville Regional Office. I held this position from 1990 to 2001. During this time, I have conducted over 1,300 inspections at facilities that generate solid waste. I received a Bachelor of Science in Animal Science from Southern Illinois University in Carbondale in 1988 and a Master of Science from Southern Illinois University at Edwardsville in 1993. I am a Certified Hazardous Material Manager. My testimony today will focus on observations made and documents obtain during inspections at solid waste generators, transporters and receiving facilities that have co-mingling non-used oil special waste with used oil and managing the mixture as used oil. In some cases non-used oil special waste was transported directly to a used oil transfer facility and subsequently managed as used oil.

The attached examples are:

**Attachment 1:** Illinois Manifest IL8097851

Illinois Manifest IL8097851 shows that 440 gallons of fixer (Not USDOT or USEPA Hazardous Material) was picked up at Schwartzkopf Printing, Inc. on September 3, 1999 by Safety-Ween Systems, Inc. and delivered to Safety-Kleen Systems, Inc. East St. Louis Rail Site. Box J states that Tanker Truck SK55173 off loaded the fixer into rail car UTLX67980 at Safety-Kleen's East St. Louis Rail Site. During an October 29, 1999 inspection at Safety-Kleen Systems, Inc. East St. Louis Rail Site discovered that rail car UTLX67980 was shipped to Safety-Kleen in Baton Rouge, Louisiana on September 16, 1999 as Used Oil and Water (not USDOT Hazardous Material). The fixer waste does not meet the definition of used oil in 35 Ill. Adm. Code 739. It was picked up by Safety-Kleen and managed as used oil at Safety-Kleen's East St. Louis Rail Site. This document was obtained during an October 7, 1999 inspection at Schwartzkopf Printing, Inc. in Alton, Illinois

**Attachment 2:** Illinois Manifest IL8154584 dated March 13, 1998  
 Safety-Kleen Oil Recovery Placement Form dated March 13, 1998  
 Generator Used Oil Certification/Indemnification dated March 13, 1998

These documents were obtained during an April 2, 1998 inspection of Roger Cartage

Illinois Manifest IL8154584 shows that 1,492 gallons of Used Oil and Water Mixture (Not USDOT Hazardous Material) was picked up from Rogers Cartage Company in Sauget, Illinois by Safety-Ween Corporation on March 13, 1998 and delivered to Safety-Kleen Systems, Inc. East St. Louis rail site. Through my interviews with plant personnel and review of Rogers Cartage records I discovered that the waste on Illinois Manifest IL8154584 contains sludge and water from a three tank wastewater treatment system used to treat wastewater from the cleaning of the residues from the insides of tanker trucks that contained chlorobenzene and international shipping containers that contained para-nitrochlorobenzene. The service bays where the used oil is generated are not connected to this wastewater treatment system.

The Safety-Kleen Oil Recovery Placement Form dated March 13, 1998 confirms this by listing 712 gallons of solids and 100 gallons of wash water were mixed with 680 gallons of other liquids. The documents also show that the sludge and wastewater were mixed with Roger Cartages' automotive service used oil. The sludge and wastewater from the water treatment system do not meet the definition of used oil. The previous shipment of this waste by Rogers Cartage was managed as a hazardous waste for ignitability (D001).

**Attachment 3:** Illinois Manifest IL8642755  
 Illinois Manifest IL8876533  
 Safety-Kleen Sample Analysis Report for wastewater & water based paint

These documents were obtained during a January 31, 2001 inspection at the Canadian National and Illinois Central rail yard in Centralia, Illinois.

Illinois Manifests IL8642755 and IL8876533 show that on July 7, 1999 2,800 gallons and 2,064 gallon, respectively, of water and paint (Not USDOT or USEPA Hazardous Material) were shipped from the Canadian National and Illinois Central rail yard in Centralia, Illinois to Safety-Kleen Systems, Inc. East St. Louis, Illinois Rail Site. This paint waste was shipped directly to East St. Louis and mixed with used oil at the East St. Louis Rail Site. The Safety-Kleen Sample Analysis Report for wastewater & water based paint show that this waste contains barium and methyl ethyl ketone. The Safety-Kleen Sample Analysis Report for wastewater & water based paint approved this wastewater and water based paint waste stream for its Vacuum Truck Service. The wastewater and water based paint waste do not meet the definition of Used Oil in 35 Ill. Adm. Code 739. This waste was taken to Safety-Kleen's East St. Louis Rail Site and mixed with used oil and subsequently managed as used oil.

During inspections, meetings and file reviews at a used oil transporter and used oil transfer facility I discovered that it is common practice by this transporter to mix non used oil waste with used oil waste and manage the mixtures as used oil. Some examples are included in the following attachments.

**Attachment 4:** Non-Oil Waste Streams

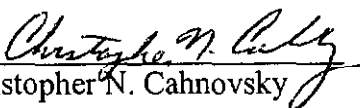
This document was obtained from Kevin Farmer of Safety-Kleen during a January 26, 2001 meeting. This is a list of non-oil waste streams that Safety-Kleen intends to accept with used oil and manage as used oil once mixed. The wastes include plastic pellets, carbon filter media, surfactants, water based paint, emulsion solutions, grain/oil/water mixture, cleaning compound, sludge, wash water, super abrasive, sand, tank sludge and water based coolants.

**Attachment 5:** Non-Oil Waste Streams

This document was obtained from Kevin Farmer of Safety-Kleen. The document is a February 13, 2001 revision of the Non-Oil Waste Streams accepted by Safety-Kleen at their East St. Louis Used Oil Transfer Station. This list includes plastic pellets, carbon filter media, surfactants, water based paint, emulsion solutions, grain/oil/water mixture, cleaning compound, sludge, wash water, super abrasive, sand, tank sludge, water based coolants and barge bilge water.

**Attachment 6:** Pages 282 and 283 of a Safety Kleen Facility Waste Report

This document is pages 282 and 283 of a Safety Kleen Facility Waste Report. This 283 page report summarizes all waste received at Safety-Kleen's East St. Louis rail site from November 1, 1999 to December 31, 2002. This document shows that the Safety-Kleen facility accepts combustible liquid, water, wash water, fixer, grease, soil, ink oily sludge, sludge, waste liquid, mineral oil, oil sludge, diesel, asphalt and combustible liquids. The aforementioned non-used oil wastes are mixed with used oil and managed by Safety-Kleen pursuant to 35 Ill. Adm. Code 739. Safety-Kleen maintains that the East St. Louis Rail Yard is only regulated under the 35 Ill. Adm. Code 739 regulations.

By:   
Christopher N. Cahnovsky

DATED: June 13, 2006

Illinois Environmental Protection Agency  
1021 North Grand Avenue East  
P.O. Box 19276  
Springfield, IL 62794-9276

SAFETY-KLEEN CORP  
EPA PRESCRIBED FORM

P.O. BOX 9276

SPRINGFIELD, ILLINOIS 62794-9276 (217) 781-1791  
State Form LPC 62 B/81 IL532-06

FOR SHIPMENT OF HAZARDOUS  
AND SPECIAL WASTE.

NOTE: FORM DESIGNED TO PRINT 8 LINES PER INCH

UNIFORM HAZARDOUS WASTE MANIFEST

|   |   |   |  |
|---|---|---|--|
| 1. Generator's US EPA ID No.<br><b>CE506</b>  | Manifest Document No.<br><b>97451</b>       | 2. Page 1 of 1  | Information in the shaded areas is not required by Federal law, but is required by Illinois law. |
| 3. Generator's Name and Mailing Address<br><b>Schwartzkopf Printing<br/>4121 Humboldt Rd.<br/>Alton, IL 62002</b>   |   | A. Illinois Manifest Document Number<br><b>IL 8097851</b> | MANIFEST RECEIVED  |
| 4. Generator's Phone<br><b>(618) 463-0747</b>   |   | B. Illinois Generator's ID<br><b>U1180V 052377</b>        |  |
| 5. Transporter 1 Company Name<br><b>SAFETY-KLEEN SYSTEMS, INC</b>   | 6. US EPA ID Number<br><b>ILD 984908202</b> | C. Illinois Transporter's ID<br><b>UPH154001</b>          | D. Transporter's Phone<br><b>618 398-6880</b>  |
| 7. Transporter 2 Company Name   | 8. US EPA ID Number                         | E. Illinois Transporter's ID                              | F. Transporter's Phone   |
| 9. Designated Facility Name and Site Address<br><b>SAFETY-KLEEN SYSTEMS, INC<br/>1700 S. 20TH ST. - B<br/>EAST ST. LOUIS IL 62207</b>   |   | 10. US EPA ID Number<br><b>ILR 000040410</b>              | G. Illinois Facility's ID<br><b>1630455153</b>   |
|   |   | H. Facility's Phone<br><b>618 398-6880</b>                |  |
| 11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)   |   |   |  |
| a. <b>USED OIL AND WATER MIXTURE<br/>(NOT USDOT HAZARDOUS MATERIAL)</b>   |   | 12. Containers<br>No. Type                                | 13. Total Quantity   |
|   |   |   | 14. Unit W/Vol   |
| b. <b>FIXER<br/>(NOT USDOT or USEPA HAZARDOUS MATERIAL)</b>   |   | 1   | TT   |
|   |   |   | G  |
| c. <b>RAILCAR UTLXG 1980 TRUCK SK55173</b>  |   |   |  |
|   |   |   |  |
| d. <b>PP# M51979</b>  |   |   |  |
|   |   |   |  |
| J. Additional Descriptions for Materials Listed Above   |   | K. Handling Codes for Wastes Listed Above in item #14     |  |
| <b>RAILCAR UTLXG 1980 TRUCK SK55173</b>   |   | <b>97961184</b>   |  |
| 15. Special Handling Instructions and Additional Information  |   | MFST R/T# 00000000-0-000-00                               |  |
| <b>EMERGENCY RESP 800-468-1760 (24 HR). IF UNDELIVERABLE RETURN TO GENERATOR. SK CORP AUTHORIZED TO RETAIN LICENSED SUBSEQUENT CARRIERS AS NECESSARY. SKDOT# A: 927 B: 5178 C: D:</b>   |   |   |  |
| 16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations, and Illinois regulations.   |   |   |  |
| If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment. OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford. |   |   |  |
| Printed/Typed Name<br><b>X GEORGE HERMANN</b>   |   | Signature<br><i>George Hermann</i>                        | DATE<br>Month Day Year<br><b>9 3 99</b>  |
| 17. Transporter 1 Acknowledgement of Receipt of Materials   |   | DATE  |  |
| Printed/Typed Name<br><b>X Kris Tucker-Love</b>   |   | Signature<br><i>Kris Tucker-Love</i>                      | DATE<br>Month Day Year<br><b>9 3 99</b>  |
| 18. Transporter 2 Acknowledgement of Receipt of Materials   |   | DATE  |  |
| Printed/Typed Name  |   | Signature   | DATE<br>Month Day Year   |
| 19. Discrepancy Indication Space  |   |   |  |
| 20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.   |   |   |  |
| Printed/Typed Name<br><b>Indira Das</b>   |   | Signature<br><i>Indira Das</i>                            | DATE<br>Month Day Year<br><b>10 3 99</b>   |

This Agency is authorized to recover reasonable costs for the Hazardous Waste Manifest (114) Container 1004 and 1005. The fee is \$10.00 per manifest form. The fee is payable to the State of Illinois, Department of Transportation, Hazardous Waste Division, 1001 East St. Louis, Illinois 62201. The fee is payable by check or money order payable to the State of Illinois. The fee is payable by the generator or transporter. The fee is payable by the generator or transporter. The fee is payable by the generator or transporter. The fee is payable by the generator or transporter.

S1363-R4505 (REPRINT)  
PARTS WASHER SERVICE  
FLUID RECOVERY SERVICES

PREQUALIFICATION EVALUATION

PAGE 1 OF 5  
COMPLETED: 08/18/99  
REVISED:  
RUN: 08/28/99

ACCEPT FOR SHIPMENT

BRANCH/SUBMITTER: 616033  
ST LOUIS

CONTROL #: 1935477-6  
LAB #: 9935477-4  
PROFILE REF #: 2131955

GENERATOR INFORMATION: CUSTOMER NUMBER: 5160-03-3502

SCHWARTZKOPF PRINTING  
4121 HUMBERT RD  
ALTON IL 62002

RTTN: JIM SCHWARTZKOPF

BRANCH: 516003 - ST LOUIS

A. GENERATOR INFORMATION:

GENERATOR NAME & FACILITY ADDRESS:  
SCHWARTZKOPF PRINTING  
4121 HUMBERT RD  
ALTON IL 62002

BILLING COMPANY & ADDRESS:

PHONE: 618-463-0747

S.I.C.: 27520101

STATUS: US EPA ID: CESQG

STATE ID: IL 1190105134

B. SHIPPING INFORMATION: 001' ASSISTANCE REQUESTED

DOT SHIP NAME: FLEXER (NOT USDOT OR USEPA HAZARDOUS MATERIAL)

HAZ CLASS/DIVISION: NO ID# (UH/NA):

PACK GRP:

NON-BULK SHIPPING CONTAINERS

55 POLY

QTY: 12 FREQ: QUARTERLY

*Sep 3rd Fri.  
9 AM.*

ACCEPT FOR SHIPMENT

CONTINUED ON NEXT PAGE

81363-R4505 (REPRINT) PREQUALIFICATION EVALUATION  
PARTS WASHER SERVICE  
FLUID RECOVERY SERVICES

PAGE 2 OF 5  
COMPLETED: 08/18/99  
REVISED:  
RUN: 86/28/99

ACCEPT FOR SHIPMENT

BRANCH/SUBMITTER: S16003  
ST LOUIS

CONTRACT #: 9935477-0  
PROFILE REF #: 2131956

C. GENERAL MATERIAL & REGULATORY INFORMATION:

NAME OF MATERIAL: FIXER DEVELOPER

PROCESS DESCRIPTION: PRINTING

ODOR: NONE

YES NO

- X REGULATED OR LICENSED RADIOACTIVE WASTE
- X REGULATEO MEDICAL / INFECTIOUS WASTE
- X WASTE SUBJECT TO BENZENE NESHAP REGULATIONS
- X TSCA REGULATED PCB WASTE
- X REGULATEO SUBPART CC WASTE (VOC'S >= 500 PPM)
- X REGULATEO OZONE DEPLETING SUBSTANCE
- X CERCLR REGULATEO (SUPERFUND) WASTE
- X HAZARDOUS DEBRIS
- X WASTE CONTAINS UHC'S/CONSTITUENTS OF CONCERN (NON-HAZ)
- X UHC IN SECTION D
- X UHC IN ADDENDUM
- X MEETS LOR STANDARDS
- X PARTIALLY MEETS (FOR LANDFILL ONLY)
- X COMMINOED WASTE
- X SORBENT ADDEO
- X BIODEGRADABLE?
- X EXEMPT WASTE; IF YES, LIST REFERENCE 40 CFR
- X STATE HAZAROOUS WASTE
- X EPA HAZARDOUS WRSTE

STATE WASTE CODES: TX OUTS1191  
EPA WASTE CODES: NONE

CTRY: USA

\*\*\* ACCEPT FOR SHIPMENT

CONTINUED 011 NEXT PAGE

81353-R4505 (REPRINT) PREQUALIFICATION EVALUATION ON  
 PARTS WASHER SERVICE  
 FLUID RECOVERY SERVICES

PAGE 3 OF 5  
 COMPLETED: 08/18/99  
 REVISED:  
 RUN: 08/28/99

ACCEPT FOR SHIPMENT

BRANCH/SUBMITTER: S15003  
 ST LOUIS

CONTROL b: 1935477-6  
 LAB #: 9935477-4  
 PROFILE REF b: 2131955

D. MATERIAL COMPOSITION:

1. CHEMICAL/PHYSICAL CONSTITUENTS:

NO VOLATILE ORGANICS DETECTED (<0.1% EACH)

0 WT%

NOH-VOLATILE ORGANICS  
 WATER CONTENT

14.0 WT%  
 86.0 WT%

2. ELEMENTAL CONSTITUENTS:

THE FOLLOWING VALUES ASSOCIATED WITH THE "<" ARE NON-DETECTED. THE VALUE LISTED IS THE REPORTING LIMIT.

|                 |   |       |       |
|-----------------|---|-------|-------|
| ANTIMONY        | < | 3.00  | MG/KG |
| ARSENIC (0004)  | < | 2.00  | MG/KG |
| BARIUM (0005)   | < | 8.00  | MG/KG |
| BERYLLIUM       | < | .10   | MG/KG |
| CADMIUM (0006)  | < | .60   | MG/KG |
| CHROMIUM (0007) | < | .40   | MG/KG |
| COBALT          | < | .60   | MG/KG |
| COPPER          | < | .60   | MG/KG |
| IRON            | < | 2.00  | MG/KG |
| LEAD (0008)     | < | 1.00  | MG/KG |
| MAGNESIUM       | < | 27.00 | MG/KG |
| MANGANESE       | < | .40   | MG/KG |
| MERCURY (0009)  | < | 2.00  | MG/KG |
| NICKEL          | < | .80   | MG/KG |
| PHOSPHORUS      | < | 4.90  | MG/KG |
| SELENIUM (0010) | < | 4.00  | MG/KG |
| SILVER (0011)   | < | 1.80  | MG/KG |
| THALLIUM        | < | 6.00  | MG/KG |
| TITANIUM        | < | .40   | MG/KG |
| VANADIUM        | < | .40   | MG/KG |
| ZINC            | < | 2.00  | MG/KG |

E. REACTIVE CHARACTERISTICS: WASTE EXHIBITS NO REACTIVE CHARACTERISTICS

|     |    |                  |    |
|-----|----|------------------|----|
| YES | NO |                  |    |
| X   |    | EXPLOSIVE        |    |
| X   |    | SHOCK SENSITIVE  |    |
| X   |    | PYROPHORIC       |    |
| X   |    | OXIDIZER         |    |
| X   |    | WATER REACTIVE   |    |
| X   |    | AIR REACTIVE     |    |
| X   |    | REACTIVE CYANIDE | .0 |
| X   |    | REACTIVE SULFIDE | .0 |
| X   |    | POLYMERIZABLE    |    |

\*\*\* ACCEPT FOR SHIPMENT

CONTINUED ON NEXT PAGE

81363-R4505 (REPRINT) PREQUALIFICATION EVALUATION  
PARTS WASHER SERVICE  
FLUID RECOVERY SERVICES

PAGE 4 OF 5  
COMPLETED: 08/18/99  
REVISED:  
RUN: 08/28/99

ACCEPT FOR SHIPMENT

BRANCH/SUBMITTER: 515003  
ST LOUIS

CONTROL b: 1935477-6  
LAB it: 9935477-4  
PROFILE REF #: 2131955

F. MATERIAL PHYSICAL CHARACTERISTICS @ 70F:  
# OF PHASES 1.000  
LIQUID % 100.300  
COLOR BLUE-GREEN  
VISCOSITY <50  
DENSITY 1.010  
NO FLASH AT 140.000 F  
ASH % 2.100 WT%  
PH LIQUIDS >20% H2O  
PH 6.900  
BTU'S / LB. OR RANGE < 500.000 BTU/LB

COMMENTS: BULK DENSITY: 1.01 WATER COMPATIBILITY: COMPATIBLE

CORPORATE REVIEW:

DISPOSITION: ACCEPT FOR SHIP PART NUMBER: 0890315 BCSNR6 WJ(25%OL 55  
REVIEW DATE: 08/18/1999 REVIEWERS: RBV

APPROVED FACILITIES:

1 SAFETY-KLEEN SYSTEMS, INC. 2 SAFETY-KLEEN SYSTEMS, INC.  
3700 LAGRANGE ROAD 1722 COPPER CREEK ROAD  
SMITHFIELD, KY 40068 DENTON, TX 76238  
FED EPA#: KYD053348108 TXD077603371  
STATE EPA#: 65124  
TELEPHONE: 5028452553 9404835200  
STATE AUTH:

APPROVED DOT SHIPPING DESCRIPTION  
0005478 DRUM OR BULK FIXER

(NOT USOOT OR USEPA HAZARDOUS MATERIAL)

STATE/PROV. CODES: TX OUTS1191

US EPA WASTE CODES: NONE

USA

REVIEW COMMENTS:

- \* OK FOR SAFETY-KLEEN VACUUM SERVICES.
- \* PROPER SHIPPING DESCRIPTION WAS BASED ON THIS SINGLE ANALYSIS. GENERATOR
- \* MUST CERTIFY THAT SHIPMENT IS NOT HAZARDOUS. PER COMPANY POLICY, FRS
- \* CUSTOMERS MUST COMPLETE GENERATOR CERTIFICATKON WITH EACH SHIPMENT
- \* AND BRANCH WILL FILE IN CUSTOMER RECORDS.
- \* OK FOR WASTE WATER FUEL. WASTE SHIPPED IN DRUMS FROM THE CUSTOMERS SITE
- \* MUST HRVE A PROPERLY CLOSED LIO OR BUNG PRIOR TO SHIPMENT.

THIS SERVES AS NOTICE PER FEDERAL AND STATE REGULATIONS THAT EACH FACILIYY  
NOTED ABOVE HAS THE APPROPRIATE PERMITS, CAPABILITIES, CAPACITY, AND IS  
WILLING TO ACCEPT THE MATERIAL AS DESCRIBED IN THE APPROVAL SECTION.  
IT IS THE RESPONSIBILITY OF THE GENERATOR TO NOTIFY SAFETY-KLEEN CORP. OF  
ANY CHANGES IN THE PROCCSS GENERATING THIS WASTE STREAM.

\*\*\* ACCEPT FOR SHIPMENT

CONTINUED ON NEXT PAGE



61363-R4506 (REPRINT)  
 PARTS LJASHER SERVICE  
 FLUID RECOVERY SERVICES

PREQUALIFICATION EVALUATION

PAGE 5 OF 5  
 COMPLETED: 08/18/99  
 REVISED:  
 RUN: 08/28/99

ACCEPT FOR SHIPMENT

BRANCH/SUBMITTER: 516003  
 ST LOUIS

CONTROL #: 1935477-6  
 LAB #: 9935477-4  
 PRJFILE REF #: 2131955

ADDITIONAL ANALYTICAL

RESULT DESCRIPTION/ELEMENT

RESULT

NON-VOLATILE ORGANICS

14

PCB

NONE

PCB AMOUNT

OTHER.

< 1.0 MG/KG

RADIOACTIVITY

NONE DETECTED

WATER COMPATIBILITY

COMPATIBLE

WATER CONTENT

86

THE ANALYSIS CONTAINED HEREIN WAS PERFORMED SOLELY FOR THE PURPOSE OF  
 QUALIFYING THE ANALYZED MATERIALS FOR ACCEPTANCE BY SAFETY-KLEEN CORP. IN  
 ACCORDANCE WITH ITS PERMITS AND PROCESSING CAPABILITIES.

NOTICE OF LAND DISPOSAL RESTRICTION OF WASTE IS NOT REQUIRED.

\*\*\* ACCEPT FOR SHIPMENT

END OF DOCUMENT



STATE OF ILLINOIS

SAFETY-KLEEN CORP.  
STATE PRESCRIBED FORM  
0-000-00

P.O. BOX

SPRINGFIELD, ILLINOIS 62794-9276 (217) 782  
State Form - LPC 62 8/81 IL532-0610

FOR SHIPMENT OF  
AND SPECIAL WASTE.

NOTE: FORM DESIGNED TO PRINT 8 LINES PER INCH

EPA Form 8700-22 (8-89)

Form Approved. OMB No. 2050-0039

|  |  |   |  |  |                                  |   |                    |  |   |
|--|--|---|--|--|----------------------------------|---|--------------------|--|---|
| UNIFORM WASTE MANIFEST   |  | 1. Generator's US EPA ID No.<br><b>IL0053965067</b> |  | Manifest Document No.<br><b>44457</b>        |                                  | 2. Page 1 of 1  |                    | Information in the shaded areas is not required by Federal law, but is required by Illinois law. |   |
| 3. Generator's Name and Mailing Address<br><b>ROGERS CARTAGE CO.<br/>2900 FALLING SPRINGS RD.<br/>SAUGET, IL 62206</b>   |  |   |  |  |                                  | A. Illinois Manifest Document Number<br><b>IL 8154584</b> |                    |  |   |
| 4. Generator's Phone<br><b>618 337-5555</b>  |  |   |  |  |                                  | B. Illinois Generator's ID<br><b>1163104510110</b>        |                    |  |   |
| 5. Transporter 1 Company Name<br><b>SAFETY-KLEEN CORP.</b>   |  |   |  | 6. US EPA ID Number<br><b>ILD 984908202</b>  |                                  | C. Illinois Transporter's ID<br><b>1123</b>               |                    | D. <b>800-1669-5740</b> Transporter's Phone  |   |
| 7. Transporter 2 Company Name  |  |   |  | 8. US EPA ID Number                          |                                  | E. Illinois Transporter's ID                              |                    | F. Transporter's Phone   |   |
| 9. Designated Facility Name and Site Address<br><b>SAFETY-KLEEN CORP.<br/>1700 S. 20TH ST.<br/>EAST ST. LOUIS IL 62207</b>   |  |   |  | 10. US EPA ID Number<br><b>ILR 000040410</b> |                                  | G. Illinois Facility ID<br><b>1610455151</b>              |                    | H. Facility's Phone<br><b>618 398-6880</b>   |   |
| 11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)  |  |   |  |  | 12. Containers                   |   | 13. Total Quantity | 14. Unit Wt/Vol  | 15. Waste No.                             |
| a. USED OIL AND WATER MIXTURE (NOT USDOT HAZARDOUS MATERIAL)   |  |   |  |  | 01                               |   | 01,492             | G  | EPA HW Number XIX<br>Authorization Number |
| b.   |  |   |  |  |                                  |   |                    |  | EPA HW Number XIX<br>Authorization Number |
| c.   |  |   |  |  |                                  |   |                    |  | EPA HW Number XIX<br>Authorization Number |
| d.   |  |   |  |  |                                  |   |                    |  | EPA HW Number XIX<br>Authorization Number |
| J. Additional Descriptions for Materials Listed Above<br><b>PP# P4457 S.G. 12 LBS/GAL<br/>TK# 55158<br/>ELP# P44567 RC# UTK 75700</b>  |  |   |  |  |                                  | K. Handling Codes for Wastes Listed Above in Item #14     |                    |  |   |
| 15. Special Handling Instructions and Additional Information<br><b>EMERGENCY RESP 800-468-1760 (24 HR). IF UNDELIVERABLE RETURN TO GENERATOR.<br/>SK CORP AUTHORIZED TO RETAIN LICENSED SUBSEQUENT CARRIERS AS NECESSARY.<br/>SKDOT# A: 927 B: C: D:</b>   |  |   |  |  |                                  |   |                    |  |   |
| 16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in proper condition for transport by highway according to applicable international and national government regulations.<br>If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford. |  |   |  |  |                                  |   |                    |  |   |
| Printed/Typed Name<br><b>RAY PAYTON</b>  |  |   |  |  | Signature<br><i>Ray Payton</i>   |   |                    | DATE<br><b>03/13/98</b>  |   |
| 17. Transporter 1 Acknowledgement of Receipt of Materials  |  |   |  |  |                                  |   |                    |  |   |
| Printed/Typed Name<br><i>Terry Bechel</i>  |  |   |  |  | Signature<br><i>Terry Bechel</i> |   |                    | DATE<br><b>03/13/98</b>  |   |
| 18. Transporter 2 Acknowledgement of Receipt of Materials  |  |   |  |  |                                  |   |                    |  |   |
| Printed/Typed Name   |  |   |  |  | Signature                        |   |                    | DATE   |   |
| 19. Discrepancy Indication Space   |  |   |  |  |                                  |   |                    |  |   |
| 20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.  |  |   |  |  |                                  |   |                    |  |   |
| Printed/Typed Name<br><i>Linda Davis</i>   |  |   |  |  | Signature<br><i>Linda Davis</i>  |   |                    | DATE<br><b>03/13/98</b>  |   |

In case of a spill call the Illinois Office of Emergency Response at 217/782-3637 and the National Response Center at 800-124-8802 or 202/426-2675.

This Agency is authorized to require, pursuant to Illinois Revised Statutes 1989, Chapter 111.5 Sections 1004 and 102, that this information be submitted to the Agency. Failure to provide the information may result in a civil penalty against the owner or operator not to exceed \$25,000 per day of violation. Falsification of this information may result in a fine up to \$50,000 per day of violation and imprisonment up to 5 years. This form has been approved by the Forms Management Center.



1000 W. RANDALL ROAD  
ELGIN, ILLINOIS 60123-7857

OIL RECOVERY PLACEMENT FORM

|                  |                |           |                  |
|------------------|----------------|-----------|------------------|
| FOR SERVICE CALL | TRANSPORTER    | DOC. EXP. | REFERENCE NUMBER |
| 618 398-6880     | LEROY SCHLUTER |           | P44457           |

5 160-72 NEW

DUNS NO. 05106-0408 FED. ID NO. 39-6090019

|               |               |      |
|---------------|---------------|------|
| NAME          | TITLE         | SIGN |
| 1. RAY PATTON | SHOP (S.M.A.) |      |
| 2.            |               |      |

|               |             |                   |          |
|---------------|-------------|-------------------|----------|
| BRANCH NO.    | 5           | 160               | 02       |
| BUSINESS TYPE | CHAIN       | CUTER COUNTY      | SVC. P/C |
| 06            |             |                   |          |
| TERRITORY     | CREDIT CODE | TAX EXEMPTION NO. |          |
|               |             |                   |          |

GENERATOR SHIPPER/LOCATION

NAME: ROGERS CARTAGE CO.

INFORMATION / ATTENTION LINE: TANK MAINTENANCE - A.L.

DELIVERY ADDRESS: 2900 FALLING SPRINGS RD. SAUGET, IL 62206

NAME: [Blank]

INFORMATION / ATTENTION LINE: [Blank]

DELIVERY ADDRESS: [Blank]

CITY: [Blank] STATE: [Blank]

DP: [Blank]

BILL TO: (IF DIFFERENT FROM LOCATION)

VAC SERV.

|              |               |                      |                  |           |               |             |             |              |             |
|--------------|---------------|----------------------|------------------|-----------|---------------|-------------|-------------|--------------|-------------|
| SERVICE DATE | SALES REP NO. | CUSTOMER P.O. NUMBER | CUSTOMER PHONE # | TAX CODE  | HANDLING CODE | ASSOC. CODE | SERVICE TAX | C.O.M.S. TAX | PRODUCT TAX |
| 3-17-98      | 5621          |                      | 618-337-5555     | 145107310 |               |             |             |              |             |

| DEPT                   | SERVICE/PRODUCT  | UNIT PRICE | QUANTITY | CHARGE | SALES TAX | TOTAL CHARGE | CHLORINE TEST RESULTS    |                          | SK DOT NUMBER | CC | SERVICE TERM | CHANGE SERVICE TERM (WEEKS INITIAL) | CHANGE SCH. DATE (Y/M/Y) | PROMO NO. | RELEASE NO. |
|------------------------|------------------|------------|----------|--------|-----------|--------------|--------------------------|--------------------------|---------------|----|--------------|-------------------------------------|--------------------------|-----------|-------------|
|                        |                  |            |          |        |           |              | HALOGEN TESTER PASS      | HALOGEN TESTER FAIL      |               |    |              |                                     |                          |           |             |
| 1                      | 44447 LIQUIDS    | 6.90       | 680      | 669.00 | ---       | 669.00       | <input type="checkbox"/> | <input type="checkbox"/> | 927           |    | 12           |                                     | 98                       |           |             |
| 2                      | 44447 SOLIDS     | 3.15       | 719      | 245.40 | ---       | 245.40       | <input type="checkbox"/> | <input type="checkbox"/> | 927           |    | 12           |                                     | 98                       |           |             |
| 3                      | 10903 SERVICE    | 225.00     | 1        | 225.00 | ---       | 225.00       | <input type="checkbox"/> | <input type="checkbox"/> |               |    |              |                                     |                          |           |             |
| 4                      | 10921 WASH. WAT. | N/A        | 100      | N/A    | ---       | N/A          | <input type="checkbox"/> | <input type="checkbox"/> |               |    |              |                                     |                          |           |             |
| TOTAL SERVICE/PRODUCTS |                  | 75.00      | 1        | 75.00  | 5.25      | 80.25        |                          |                          |               |    |              |                                     |                          |           |             |

GENERATOR STATUS: CHECK ONLY ONE BOX BELOW

MANIFEST NO.: TLR154584 USEPA TRANSPORTER ID NO.: ILD984908202

GENERATOR USEPA ID NO.: TLD053965067 GENERATOR STATE ID NO.: 1630455010

TRANSPORTER: TERRY BACHTEL DATE: 3/13/98

FACILITY: [Blank] DATE: 1/1

|  |                            |                            |  |  |                                     |   |                                       |
|--|----------------------------|----------------------------|--|--|-------------------------------------|---|---------------------------------------|
| GENERATOR HAZARDOUS WASTE CLASSIFICATION | VEHICLE FLUIDS ONLY        | OTHER NON-VEHICLE FLUIDS   | 1 NO PREQUAL REQUIRED. NO HALOGEN TEST | 2 NO PREQUAL REQUIRED. HALOGEN TEST AT PICK-UP | 3 PREQUAL REQUIRED. NO HALOGEN TEST | 4 PREQUAL REQUIRED. HALOGEN TEST AT PICK-UP | REFER TO REVERSE SIDE FOR DEFINITIONS |
| CESQG <input type="checkbox"/> 1         | <input type="checkbox"/> 2 | <input type="checkbox"/> 3 | <input type="checkbox"/> 4             |  |                                     |   |                                       |

|  |                    |                    |                 |               |
|--|--------------------|--------------------|-----------------|---------------|
| 11. US DOT DESCRIPTION (INCLUDING PROPER SHIPPING NAME, HAZARD CLASS, AND ID.) | 12. CONTAINERS NO. | 13. TOTAL QUANTITY | 14. UNIT WT/VOL | SK DOT NUMBER |
| A. USED OIL (NOT USDOT HAZARDOUS MATERIAL)                                     |                    |                    |                 | 850           |
| B. USED OIL AND WATER MIXTURE (NOT USDOT HAZARDOUS MATERIAL)                   | 1 TT               | 0.492              | G               | 927           |
| C. USED ANTIFREEZE (NOT USEPA OR USDOT REGULATED)                              |                    |                    |                 | 1176          |

INTERMEDIATE FACILITY NAME AND ADDRESS: SAFETY-KLEEN CORP. EAST ST. LOUIS, IL 62207

USA EPA ID NO.: TLR00040410 STATE ID NO.: 1630455153

TOTAL DUE: 3373.65

CASH  TOTAL RECEIVED

CHECK NUMBER

APPLY PAYMENT TO:  TODAY'S SERVICE/SALE  PREVIOUS BALANCE AS FOLLOWS

INVOICE # AMOUNT \$ INVOICE # AMOUNT \$

PREVIOUS CREDIT CARD NO.

CREDIT CARD NO. AMEX VISA MC EXP. DATE

MANIFEST CODE: 8 D

IN THE EVENT OF AN EMERGENCY CALL

CHARGE MY ACCOUNT FOR THIS TRANSACTION UNLESS OTHERWISE INDICATED IN THE PAYMENT RECEIVED SECTION. SEE ADDITIONAL TERMS AND CONDITIONS ON REVERSE SIDE AND MADE A PART HEREOF.

Print Name: RAY PATTON

GENERATOR/SHIPPER DESIGNATED REPRESENTATIVE SIGNATURE: [Signature]

P44457

5621

Attachment 2





Illinois Generators

# GENERATOR USED OIL CERTIFICATION/INDEMNIFICATION

## Generator Information

Date 3-13-98

ROGERS CARTAGE CO.  
 Company  
2900 FALLING SPRING RD.  
 Address  
SAUGET, IL 62206  
 City State Zip

S K Customer No 5621  
 S K Oil Services Sales Rep 5-160-72  
 S-K Branch No \_\_\_\_\_

### Used Oil Certification (check appropriate box)

- Used oils generated at this facility originate only from automotive sources. Automotive sources include, but are not limited to, commercial service service stations, oil change stations, and truck 1 automobile fleet maintenance.  
 This facility generates; (check appropriate box)
  - 41001 gal 1 quarter
  - 1000 gal 1 quarter
- Used oils generated at this facility may include oils from sources other than automotive including, but not limited to, industrial lubricating oils, cutting oils, or gear oils.

### Hazardous Waste Certification (check appropriate box)

- This facility generates less than 100 kg of hazardous waste in a calendar month (approximately 27 gallons), and is classified as a CESOG.
- This facility generates between 100 kg and 1000 kg of hazardous waste in a calendar month (approximately 27 to 270 gallons), and is classified as a SOG.
- This facility generates more than 1000 kg of hazardous waste in a calendar month (approximately 270 gallons), and is classified as a LOG

### Waste Segregation Certification (check if applicable)

- This facility has available on-site the equipment 1 services necessary to properly segregate all waste streams generated at the facility, and ensure that RCRA hazardous wastes are not mixed into the used oils.

### Total Chlorine Analysis

- Analysis Not Required  
Automotive Oil Only / CESOG
- Automotive Oil Only and segregates the oil from all hazardous wastes
- Analysis Required  
(Complete information at right)

### Automotive Oil:

Chlorine: \_\_\_\_\_ 41000 ppm  
 \_\_\_\_\_ 1000 ppm  
 (If 1000 ppm, a sample must be sent to the Tech Center for rebuttal)

### Industrial Oil:

Date of Preshipment \_\_\_\_\_  
 Approval: \_\_\_\_\_  
 Chlorine Test: \_\_\_\_\_  
 (must be performed at the time of each service to ensure the oil matches the preshipment analysis)

Generator hereby certifies that the information provided above is true and correct. Generator also certifies that the used oils supplied to Safety-Kleen or its subsidiary will not be mixed, combined, or otherwise blended in any quantity with materials containing polychlorinated biphenyls (PCBs), halogenated solvents, or any other material defined as hazardous waste under 40 CFA Part 261 or applicable State regulations. Generator agrees to indemnify and hold Safety-Kleen or its subsidiary harmless for any damages, costs, attorneys and experts fees, arising out of or in any way related to a breach of any of the above certifications by Generator.



SAFETY-KLEEN CORP.  
 1000 North Randall Road  
 Elgin, Illinois 60123

Attachment 2

By: RAY DAVISON  
 (Print Customer's Name)  
[Signature]  
 (Signature)  
[Title]  
 (Title)



PLEASE TYPE (Form designed for use on elite (12 pitch) typewriter.)

EPA Form 8700-22 (Rev. 6-85)

Form Approved, OMB No. 2050-0039

|  |  |   |  |   |  |  |  |  |  |
|--|--|---|--|---|--|--|--|--|--|
| <b>UNIFORM HAZARDOUS WASTE MANIFEST</b>  |  | 1. Generator's US EPA ID No.<br>ILD000806034 155577 |  | Municipal Document No.                                |  | 5. Page 1 of 1                                     |  | Information in the shaded areas is not required by Federal law, but is required by Illinois law. |  |
| 2. Generator Name and Mailing Address<br>ILLINOIS CENTRAL RAILROAD<br>3006 ILMORE ST.<br>CENTRALIA IL 62501<br>24 HOUR EMERGENCY AND SPILL ASSISTANCE NUMBERS  |  |   |  | Location of Facility                                  |  | A. Illinois Manifest Document Number<br>IL 8642755 |  |  |  |
| 3. Transporter 1 Company Name<br>SAFETY KLEEN SYSTEMS  |  | 6. US EPA ID Number<br>ILD099490920                 |  | C. Transporter's ID Number                            |  | 118W615123704                                      |  |  |  |
| 7. Transporter 2 Company Name  |  | 8. US EPA ID Number                                 |  | D. Transporter's Phone                                |  | 317-328-2000                                       |  |  |  |
| 9. Designated Facility Name and Site Address:<br>SAFETY KLEEN SYSTEMS<br>1700 S. 20TH ST - B<br>EAST ST. LOUIS IL 62207  |  |   |  | 10. US EPA ID Number<br>ILR00040410                   |  | F. Transporter's Phone ( )                         |  |  |  |
| 11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)   |  |   |  | 12. Containers  |  | 13. Total Quantity                                 |  | 14. Unit Wt/Vol  |  |
| a. WATER & PAINT   |  |   |  | No. Type  |  |  |  |  |  |
| c. NOT US DOT OR USEPA HAZARDOUS MATERIALS   |  |   |  |   |  |  |  | EPA HW Number  |  |
|  |  |   |  |   |  |  |  | EPA HW Number  |  |
|  |  |   |  |   |  |  |  | EPA HW Number  |  |
|  |  |   |  |   |  |  |  | EPA HW Number  |  |
| Additional Description for Materials Listed Above<br>RAILCAR TRUCK   |  |   |  | K. Handling Codes for Wastes Listed Above in Item #14 |  |  |  |  |  |
| 15. Special Handling Instructions and Additional Information<br>EMERGENCY RESP. 1800 468-1760 (24 HRS) IF UNDELIVERABLE<br>RETURN TO GENERATOR   |  |   |  |   |  |  |  |  |  |
| 16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.<br>If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford. |  |   |  |   |  |  |  |  |  |
| Printed/Typed Name<br>DAVID A. BEER  |  |   |  | Signature<br>David A. Beer                            |  | Date<br>070799                                     |  | Date   |  |
| 17. Transporter 1 Acknowledgement of Receipt of Materials  |  |   |  |   |  |  |  |  |  |
| Printed/Typed Name<br>DAVID KING   |  |   |  | Signature<br>David King                               |  | Date<br>070799                                     |  | Date   |  |
| 18. Transporter 2 Acknowledgement of Receipt of Materials  |  |   |  |   |  |  |  |  |  |
| Printed/Typed Name   |  |   |  | Signature   |  | Date   |  | Date   |  |
| 19. Discrepancy Indication Space   |  |   |  |   |  |  |  |  |  |
| 20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.   |  |   |  |   |  |  |  |  |  |
| Printed/Typed Name   |  |   |  | Signature   |  | Date   |  | Date   |  |

This Agency is authorized to require, pursuant to Illinois Revised Statute, 1969, Chapter 111, 1/2, Section 1004 and 1021, the information information may result in a civil penalty against the owner or operator not to exceed \$25,000 per day of violation. Falsification of this information may result in a civil penalty up to 5 years. This form has been approved by the Farms Management Center.

Office of Emergency Response at 217 / 792-7650 and the National Response Center at 800 / 424-8902 or 202 / 426-2575.



NOTE: FORM DESIGNED TO PRINT 8 LINES PER INCH

FOR SHIPMENT OF HAZARDOUS AND SPECIAL WASTE.

|  |  |   |                                       |   |  |   |                           |
|--|--|---|---------------------------------------|---|--|---|---------------------------|
| <b>UNIFORM HAZARDOUS WASTE MANIFEST</b>  |  | 1. Generator's US EPA ID No.<br><i>ILD000806034</i> | Manifest Document No.<br><i>55571</i> | 2. Page 1 of 1  | Information in the shaded areas is not required by Federal law, but is required by Illinois law. |   |                           |
| 3. Generator's Name and Mailing Address<br><i>ILLINOIS CENTRAL RAILROAD<br/>600 GILMORE<br/>CENTRALIA, IL 62501</i>  |  |   |                                       | A. Illinois Manifest Document Number<br><b>IL 8876533</b> |  | MANIFEST FEE PAID                                   |                           |
| 4. Generator's Phone<br><i>(618) 533-3360</i>  |  |   |                                       | B. Generator's IL ID Number<br><i>URVWR2156720</i>        |  | C. Illinois Transporter's ID<br><i>UPW015128901</i> |                           |
| 5. Transporter 1 Company Name<br><i>SAFETY-KLEEN SYSTEMS, INC</i>  |  | 6. US EPA ID Number<br><i>ILD 984908203</i>         |                                       | D. (217) 328-2000   |  | Transporter's Phone                                 |                           |
| 7. Transporter 2 Company Name  |  | 8. US EPA ID Number                                 |                                       | E. Illinois Transporter's ID                              |  | F. ( ) Transporter's Phone                          |                           |
| 9. Designated Facility Name and Site Address<br><i>SAFETY-KLEEN SYSTEMS INC<br/>1990 E WASHINGTON-B<br/>EAST PEORIA IL 61611</i>   |  | 10. US EPA ID Number<br><i>ILA 000058933</i>        |                                       | G. Facility's IL ID Number<br><i>1790205112</i>           |  | H. Facility's Phone<br><i>309 346-1813</i>          |                           |
| 11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)  |  |   |                                       | 12. Containers  | 13. Total Quantity   | 14. Unit Wt/Vol                                     | I. Waste No.              |
| a. <del>USED OIL AND FILTER MATERIAL<br/>(NOT US DOT HAZARDOUS MATERIAL)</del>   |  |   |                                       | No.   | Type   |   | EPA HW Number<br><i>A</i> |
| b. <i>WATER + PAINT<br/>(NOT US DOT OR USEPA HAZARDOUS MATERIAL)</i>   |  |   |                                       | <i>XXXX</i>   | <i>TC</i>  | <i>XXXX</i>   | EPA HW Number             |
| c.   |  |   |                                       |   |  |   | EPA HW Number             |
| d.   |  |   |                                       |   |  |   | EPA HW Number             |
| J. Additional Descriptions for Materials Listed Above  |  |   |                                       | K. Handling Codes for Wastes Listed Above in Item #14     |  |   |                           |
| 15. Special Handling Instructions and Additional Information<br><i>EMERGENCY RESP 800-468-1780 (24 HR). IF UNDELIVERABLE RETURN TO GENERATOR.<br/>SK CORP AUTHORIZED TO RETAIN LICENSED SUBSEQUENT CARRIERS AS NECESSARY.<br/>SKDOT# A: <i>347</i> B: <i>927</i> C: D:</i>   |  |   |                                       |   |  |   |                           |
| 16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations, and Illinois regulations.<br>If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford. |  |   |                                       |   |  |   |                           |
| Printed/Typed Name<br><i>DAVID A. BEER</i>   |  |   |                                       | Signature<br><i>David A. Beer</i>                         |  | DATE<br><i>07/07/99</i>                             |                           |
| 17. Transporter 1 Acknowledgement of Receipt of Materials  |  |   |                                       | Printed/Typed Name<br><i>DAVID KING</i>                   |  | Signature<br><i>David King</i>                      |                           |
| 18. Transporter 2 Acknowledgement of Receipt of Materials  |  |   |                                       | Printed/Typed Name  |  | Signature   |                           |
| 19. Discrepancy/Indication Space   |  |   |                                       |   |  |   |                           |
| 20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.  |  |   |                                       | Printed/Typed Name<br><i>Shawn Hoehn</i>                  |  | Signature<br><i>Shawn Hoehn</i>                     |                           |
|  |  |   |                                       |   |  | DATE<br><i>10/18/99</i>                             |                           |

GENERATOR

TRANSPORTER

FACILITY

Case or a spill call the Illinois Office of Emergency Response at 217/782-3637 and the National Response Center at 800/424-8802 or 202/426-2675.



**SAFETY-KLEEN SAMPLE ANALYSIS REPORT**  
**Prequalification TCLP Report**

|   |                            |  |
|---|----------------------------|--|
| <b>SAMPLE DESCRIPTION:</b><br>WASTE WATER & WATER BASED PAINT     | <b>ACCEPT FOR SHIPMENT</b> | <b>PAGE 1</b>  |
| <b>S-K REPRESENTATIVE:</b> KEVIN WILSON<br><b>BRANCH#:</b> 503301 |                            | <b>REPORT DATE:</b> 04/07/1999   |
| <b>CUSTOMER #:</b> 9312   |                            | <b>CONTROL #:</b> 1910886-2<br><b>SURVEY #:</b> 2015681<br><b>LAB #:</b> 9910886 |

**Generator:** IL CENTRAL RAILROAD  
600 GILMORE ST  
CENTRALIA, IL 62801

**Attention:** JOHN BURCH

The enclosed TCLP Analysis and/or suitable generator knowledge as applied to your company on the sample in question **DOES NOT SHOW** **my** TCLP Characteristic Waste Code.

For the material to be classified as non-hazardous, the generator must determine that the waste is not defined as a "listed hazardous waste, not mixed with a "listed" hazardous waste, not derived from a "listed" hazardous waste, and obtain adequate information pertaining to the hazardous characteristics of:

- |               |                         |
|---------------|-------------------------|
| Ignitability  | Waste Code D001         |
| Corrosivity   | Waste Code D002         |
| Reactivity    | Waste Code D003         |
| TCLP Toxicity | Waste Codes D004 - D043 |

reviewed and accepted for shipment

A Safety-Kleen representative will be contacting you with further detail regarding the shipping handling, and processing of your material.

If you have any questions regarding the above analysis, please contact Customer Service at (773)825-7338

Continued on next page

Control #: 1910886-2  
 Survey #: 2015681

ACCEPT FOR SHIPMENT

PAGE 2  
 IL CENTRAL RAILROAD

**MISCELLANEOUS**

| EPA Waste # | Test              | Date Analyzed | EPA Method | TCLP Reg Limit | Result | Units |
|-------------|-------------------|---------------|------------|----------------|--------|-------|
|             | Cyanide Screening | 03/29/1999    | D5049-90   | 250            | NEG    | mg/L  |
|             | Sulfide Screening | 03/29/1999    | D4978-89A  | 500            | NEG    | mg/L  |
| D001        | Flash Point       | 03/29/1999    | 1020       | ≤140           | >142   | °F    |
| D002        | pH                | 03/29/1995    | 9040       | ≤2, ≥12.5      | 7.67   | mg/L  |

**SEMI-VOLATILES IN TCLP LEACHATE**

| EPA Waste # | Analyte               | Date Analyzed | EPA Method | TCLP Reg Limit mg/L | Result mg/L |
|-------------|-----------------------|---------------|------------|---------------------|-------------|
| D023        | 2-Methylphenol        | 04/02/1999    | 8270       | 200                 | <0.98       |
| D024/25     | 3+4-Methylphenol      | 04/03/1999    | 8270       | 200                 | <1.3        |
| D030        | 2,4-Dinitrotoluene    | 04/03/1999    | 8270       | 0.13                | <0.67       |
| D032        | Hexachlorobenzene     | 04/02/1999    | 8270       | 0.13                | <1.1        |
| D033        | Hexachlorobutadiene   | 04/02/1999    | 8270       | 0.5                 | <1.1        |
| D034        | Hexachloroethane      | 04/02/1999    | 8270       | 3                   | <1 oil      |
| D036        | Nitrobenzene          | 04/02/1999    | 8270       | 2                   | <0.97       |
| 0037        | Pentachlorophenol     | 04/02/1999    | 8270       | 100                 | <2.4        |
| D038        | Pyridine              | 04/02/1999    | 8270       | 5                   | <2.9        |
| D041        | 2,4,5-Trichlorophenol | 03/02/1999    | 8270       | 400                 | <1.0        |
| D042        | 2,4,6-Trichlorophenol | 04/02/1999    | 8270       | 2                   | <1.5        |



Control #: 1910886-2  
Swey #: 2015651

ACCEPT FOR SHIPMENT

PAGE 3

IL CENTRAL RAILROAD

**METALS IN TCLP LEACHATE**

| EPX Waste # | Analyte  | Date Analyzed | EPX Method | TCLP Reg Limit mg/L | Result mg/L |
|-------------|----------|---------------|------------|---------------------|-------------|
| D004        | Arsenic  | 0313011999    | 6010       | 5                   | <5.00       |
| D005        | Barium   | 0313011999    | 6010       | 100                 | 42.5        |
| D006        | Cadmium  | 0313011999    | 6010       | 1                   | <0.500      |
| D007        | Chromium | 030011999     | 6010       | 5                   | <0.500      |
| D008        | Lead     | 0313011999    | 6010       | 1                   | <4.00       |
| D009        | Mercury  | 0313011999    | 7471       | 0.2                 | <0.10       |
| D010        | Selenium | 03/31/1999    | 7730       | 1                   | <0.45       |
| D011        | Silver   | 0313011999    | 6010       | 5                   | <0.500      |

**VOLATILE ORGANICS IN TCLP LEACHATE**

| EPA Waste # | Analyte              | Date Analyzed | EPA Method | TCLP Reg Limit mg/L | Result mg/L |
|-------------|----------------------|---------------|------------|---------------------|-------------|
| D018        | Benzene              | 0312911999    | 8260       | 0.5                 | <0.20       |
| D019        | Carbon Tetrachloride | 0312911999    | 8260       | 0.5                 | <0.20       |
| D021        | Chlorobenzene        | 0312911999    | 8260       | 100                 | <0.20       |
| D022        | Chloroform           | 0312911999    | 8260       | 6                   | <0.20       |
| D027        | 1,4-Dichlorobenzene  | 03/29/1999    | 8260       | 7.5                 | <0.20       |
| D028        | 1,2-Dichloroethane   | 03/29/1999    | 8360       | 0.5                 | <0.20       |
| D029        | 1,1-Dichloroethylene | 0312911999    | 8260       | 0.7                 | <0.20       |
| D035        | Methyl Ethyl Ketone  | 0312911999    | 8260       | 200                 | 1.01        |
| D039        | Tetrachloroethylene  | 03/29/1999    | 8260       | 0.7                 | <0.20       |
| D040        | Trichloroethylene    | 03/29/1999    | 8260       | 0.5                 | <0.20       |
| D043        | Vinyl Chloride       | 03/29/1999    | 8260       | 0.2                 | <0.14       |

Control #: 1910886-2  
Survey #: 2015681

ACCEPT FOR SHIPMENT

PAGE 4  
IL CENTRAL RAILROAD

**Sample Description:**

WASTE WATER & WATER BASED PAINT

**SAMPLE HANDLING DATES**

Date Sampled: 03/25/1999  
Date Received: 03/26/1999

**SAMPLE COMPOSITION**

Number of Phases: 1  
Percent Solids (Method 1311): 0.44%  
Percent Dry Solids (Method 1311): 0.08%

**LEACHING/EXTRACTION DATES**

|                 | Method | Date         |
|-----------------|--------|--------------|
| Bottle Leach:   | 1311   | Not Required |
| ZHE Leach:      | 1311   | Not Required |
| BNA Extraction: | 3510   | 03/29/1999   |

The analysis contained herein are performed to provide Safety-Kleen Corp. and its customers a means of determining compliant waste handling practices that are consistent with applicable permits and processing capability.



**SAFETY-KLEEN SAMPLE ANALYSIS REPORT**  
*Prequalification TCLP Combination Report*

Oil Services

STATUS

RECENED 3/30/1999

S-K REPRESENTATIVE: Kevin Wilson  
BRANCH/ARM#: 503301

**ACCEPT FOR  
SHIPMENT**

COMPLETED: 4/5/1999  
**REVISED** 4/7/1999  
REPORT DATE: 4/7/1999

SAMPLE DESCRIPTION: Waste Water &amp; Waterbased Paint

CONTROL #: 1911256-8  
SURVEY #: 2015681  
LAB 9911256  
#

Nature of Business: Railroad

S.I.C.:

Status: SQG

Facility Address:  
600 Gilmore St  
Centralia, IL 62801-5212

Billing Address:

Process Description: Painting Of Railcars  
Material Description: Waste Water & Waterbased Paint  
Generation Amount: 7000 Gallons Yearly  
Gallons On Hand:

P.O. #: Date Survey Signed: 03/16/1999  
Contact: John Burch Title: Manager  
Phone: (618)533-3366

Survey Comments: Looking for SKVS Approval. TCLP Combo w/9910886

The analysis contained herein are performed solely for the purpose of qualifying the analyzed materials for acceptance by Safety-Kleen Corp. in accordance with its permits and processing capability. This report shall not be reproduced in except in full, without the written permission of the Safety-Kleen Techninal Center

**CORPORATE REVIEW**

Disposition: Accept for shipment Attachment 3 Part Number: 87174 Waste Water  
Review Date: 4/5/1999 Reviewers: RBU CAS AS

Continued on next page

Control #: 1911256-8

) ACCEPT FOR SHIPMENT )

PAGE 4

Survey #: 2015681

Central Railroad

**APPROVED FACILITIES:**Safety-Kleen Corp.  
1722 Cooper Creek Road

FED EPA Number : TXD077603371

State EPA Number : 65124

Telephone : 817-383-2611

Denton, TX 76208

State Authorization :

Additional Description:

Safety-Kleen Corp.  
633 East 138th Sneet

FED EPA Number : ILD980613913

State EPA Number : 0310690006

Telephone : 708-849-1850

Dolton, IL 60419

State Authorization :

Additional Description:

Safety-Kleen Corp.  
3700 LaGrange Road

FED EPA Number : KYD053348108

State EPA Number :

Telephone : 502-845-2453

Smithfield, KY 40068

State Authorization :

Additional Description:

**APPROVED DOT - SHIPPING DESCRIPTION**

SKDOT #: 0001037

WATER AND PAINT

(NOT USDOT OR USEPA HAZARDOUS MATERIAL)

State/Prov. Codes: TX OUTS1141

US EPA Waste Codes: NONE

**REVIEW COMMENTS**

OK for waste water fuel. Waste shipped in drums from the customers site need robs equipped with a bung in the top lid prior to shipment. Drums received from the customer lacking bungs will be returned to the customer by the SK TSDF.

Proper shipping description was based on this single analysis. Generator must certify that shipment is not hazardous. Per company policy, FRS customers must complete Generator Certification with each shipment and branch will file in customer records.

OK for Safety-Kleen vacuum services.

USEPA Non-hazardous per TCLP Lims#9910886

**This** serves as notice per federal and shte regulations that each facility noted above **has** the **appropriate** permits, capabilities, capacity; and is willing to accept the material as described in the **approval section**. **It is the** responsibility of the generator to notify Safety-Kleen **Corp.** of any changes in **the process generating this** waste stream..

Control #: 1911256-8  
Survey #: 2015681

ACCEPT FOR SHIPMENT

PAGE 5  
Ill Central Railroad**GENERAL ANALYSIS**

| Phase:                | Parameter             | Date Analyzed        | Result               | Units         |
|-----------------------|-----------------------|----------------------|----------------------|---------------|
| TOTAL                 | Water Compatibility   | 3/30/1999            | Compatible           |               |
|                       | pH by Meter Direct    | 3/30/1999            | 7.0                  |               |
|                       | Water Content         | 3/30/1999            | 100                  | wt. %         |
|                       | Viscosity             | 3/31/1999            | <50                  | cps           |
|                       | Color                 | 3/30/1999            | GREY, LT GREY        |               |
|                       | Radioactivity         | 3/30/1999            | None Detected        |               |
|                       | Bulk Density          | 3/31/1999            | 1.00                 |               |
|                       | Flammability at 73 F  | 3/31/1999            | No Flash             |               |
|                       | Flammability at 140 F | 3/31/1999            | No Flash             |               |
|                       | Phase: AQUEOUS        | <u>Parameter</u>     | <u>Date Analyzed</u> | <u>Result</u> |
| Phase % by Centrifuge |                       | 3/31/1999            | 80                   | vol. %        |
| Phase % by Appearance |                       | 3/33/1999            | 99                   | vol. %        |
| Phase: AQUEOUS 2      | <u>Parameter</u>      | <u>Date Analyzed</u> | <u>Result</u>        | <u>Units</u>  |
|                       | Phase % by Centrifuge | 3/31/1999            | 19                   | vol. %        |
| Phase: SOLIDS         | <u>Parameter</u>      | <u>Date Analyzed</u> | <u>Result</u>        | <u>Units</u>  |
|                       | Phase % by Centrifuge | 3/31/1999            | 1.0                  | vol. %        |
|                       | Phase % by Appearance | 3/31/1999            | 1.0                  | vol. %        |

Control #: 1911256-8  
 Survey #: 2015681

ACCEPT FOR SHIPMENT

PAGE 6  
 Ill Central Railroad

**ELEMENTAL ANALYSIS**

Phase: TOTAL

| <u>Element</u> | <u>Symbol</u> | <u>Characteristic Waste Code</u> | <u>Date Analyzed</u> | <u>Result</u> | <u>Units</u> |
|----------------|---------------|----------------------------------|----------------------|---------------|--------------|
| Antimony       | Sb            |                                  | 4/1/1999             | <6.9          | mg/Kg        |
| Arsenic        | As            | D004                             | 4/1/1999             | <4.6          | mg/Kg        |
| Barium         | Ba            | D005                             | 4/1/1999             | 54            | mg/Kg        |
| Beryllium      | Be            |                                  | 4/1/1999             | <0.92         | mg/Kg        |
| Cadmium        | Cd            | D006                             | 4/1/1999             | <1.4          | mg/Kg        |
| Chromium       | Cr            | D007                             | 4/1/1999             | <0.92         | mg/Kg        |
| Cobalt         | Co            |                                  | 4/1/1999             | <1.4          | mg/Kg        |
| Copper         | Cu            |                                  | 4/1/1999             | <1.4          | mg/Kg        |
| Iron           | Fe            |                                  | 4/1/1999             | 74            | mg/Kg        |
| Lead           | Pb            | D008                             | 4/1/1999             | <2.3          | mg/Kg        |
| Magnesium      | Mg            |                                  | 4/1/1999             | 13            | mg/Kg        |
| Manganese      | Mn            |                                  | 4/1/1999             | <0.92         | mg/Kg        |
| Mercury        | Hg            | D009                             | 4/1/1999             | <4.6          | mg/Kg        |
| Nickel         | Ni            |                                  | 4/1/1999             | <1.8          | mg/Kg        |
| Phosphorus     | P             |                                  | 4/1/1999             | 5.5           | mg/Kg        |
| Selenium       | Se            | D010                             | 3/1/1999             | <9.2          | mg/Kg        |
| Silver         | Ag            | D011                             | 4/1/1999             | <0.46         | mg/Kg        |
| Thallium       | Tl            |                                  | 4/1/1999             | <14           | mg/Kg        |
| Titanium       | Ti            |                                  | 4/1/1999             | 4.2           | mg/Kg        |
| Vanadium       | V             |                                  | 4/1/1999             | <0.92         | mg/Kg        |
| Zinc           | Zn            |                                  | 4/1/1999             | <4.6          | mg/Kg        |

**FUEL EVALUATION**

Phase: TOTAL

|                     | <u>Date Analyzed</u> | <u>Result</u> | <u>Units</u> |
|---------------------|----------------------|---------------|--------------|
| Heat Content        | 3/31/1999            | <500          | Btu/lb       |
| Ash Upon Combustion | 3/31/1999            | 6.8           | wt. %        |
| Total Halogens      | 4/1/1999             | <0.10         | wt. %        |
| Total Fluorine      | 3/31/1999            | <0.015        | wt. %        |
| Total Chlorine      | 3/31/1999            | <0.021        | wt. %        |
| Total Bromine       | 3/31/1999            | <0.019        | wt. %        |
| Total Sulfur        | 3/31/1999            | <0.029        | wt. %        |

**VOLATILE ORGANIC COMPOSITION**

Phase: TOTAL

| <u>Compound Name</u>                                 | <u>CAS Number</u> | <u>Result</u> | <u>Units</u> |
|--|-------------------|---------------|--------------|
| Traces of Volatile Organics Detected<br>(<1.0% Each) |                   | 0.15          | wt. %        |

Control #: 1911256-8

ACCEPT FOR SHIPMENT

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Survey #: 2015681

Central Railroad

**SPECIFIC ORGANIC COMPOSITION****POLYCHLORINATED BIPHENYLS (PCBs):**

| <u>Compound Name</u> | <u>Result</u> | <u>Units</u> |
|----------------------|---------------|--------------|
| Aroclor 1016         | <1.0          | mg/Kg        |
| Aroclor 1221         | <1.0          | mg/Kg        |
| Aroclor 1232         | <1.0          | mg/Kg        |
| Aroclor 1242         | <1.0          | mg/Kg        |
| Aroclor 1248         | <1.0          | mg/Kg        |
| Aroclor 1254         | <1.0          | mg/Kg        |
| Aroclor 1260         | <1.0          | mg/Kg        |
| Aroclor <b>1262</b>  | <1.0          | mg/Kg        |
| Aroclor 1368         | <1.0          | mg/Kg        |

**ANALYTICAL SERVICES**

Comments: ,

Control # 19112568

ACCEPT FOR SHIPMENT

PAGE 7

Survey # 2015681

Ill Central Railroad

**SPECIFIC ORGANIC COMPOSITION**

**POLYCHLORINATED BIPHENYLS (PCBs):**

| <u>Compound Name</u> | <u>Result</u> | <u>Units</u> |
|----------------------|---------------|--------------|
| Aroclor 1016         | <1.0          | mg/Kg        |
| Aroclor 1221         | <1.0          | mg/Kg        |
| Aroclor 17-32        | <1.0          | mg/Kg        |
| Aroclor 1242         | <1.0          | mg/Kg        |
| Aroclor 11-48        | <1.0          | mg/Kg        |
| Aroclor 1254         | <1.0          | mg/Kg        |
| Aroclor 1260         | <1.0          | mg/Kg        |
| Aroclor 1262         | <1.0          | mg/Kg        |
| Aroclor 1268         | <1.0          | mg/Kg        |

**ANALYTICAL SERVICES**

Comments: .



## **NON-OIL WASTE STREAMS**

Examples of previously sampled waste streams

- Plastic Pellets
- Carbon Filter Media
- Surfactants
- Water Based Paint
- Water Based **Ink**
- Emulsion Solution
- **Grain/Oil/Water** Mixture
- Cleaning Compound
- Sludge
- Wash Water
- Super Abrasive
- Sand
- Tank Sludge
- Water Based Coolants

*Safety-Kleen  
East St. Louis/  
Safety-Kleen*

Revised 2-13-01

## NON-OIL WASTE STREAMS

### Examples of previously sampled waste streams

- Plastic Pellets
- Carbon Filter Media
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- Cleaning Compound
- Sludge
- Wash Water
- Super Abrasive
- Sand
- Tank Sludge
- Water Based Coolants
- Barge Bilge Water

DATE: 11/06/94  
 PRINT LDC PAGE: 285  
 515002

SAFETY-KLEEN SYSTEMS, INC.  
 FACILITY WASTE REPORT

SEL TO: 11/06/94  
 11/06/94

FILE NO. 11900000410 SAFETY-KLEEN SYSTEMS, INC. J-502-64  
 NOT TO BE USED AS SOLE SOURCE FOR REPORTING PURPOSES. REG BY: MAINDABB WIERZBACKI.  
 EAST ST. LOUIS IL 62207

00000004 SAFETY-KLEEN SYSTEMS, INC. 1700 S. 20TH ST. - B  
 11900000410  
 000000045153  
 000000045150 HORE TT 1 G 512.0 0001002 USED OIL AND WATER MIXTURE (NOT USDOT HAZARDOUS MATERIAL) IL 079656405  
 000000045150 NONE TT 1 G 512.0 0037072 NON RCRA/NON DOT REGULATED MATERIAL (ANTIFREEZE, OIL AND WATER MIXTURE) IL 079656405

REGULATOR  
 NONE  
 NONE  
 NONE

REGULATOR  
 NONE  
 NONE  
 NONE

| Facility    | Regulator | Quantity | Material Description       | Material ID | Material Name              | Material Description       |
|-------------|-----------|----------|----------------------------|-------------|----------------------------|----------------------------|
| 50,469.0    |           |          | USED OIL AND WATER MIXTURE | 0000850     | USED OIL AND WATER MIXTURE | USED OIL AND WATER MIXTURE |
| 1,148,261.0 |           |          | USED OIL                   | 0000927     | USED OIL                   | USED OIL                   |
| 12,657.0    |           |          | USED OIL                   | 0001001     | USED OIL                   | USED OIL                   |
| 53,320.0    |           |          | USED OIL                   | 0001002     | USED OIL                   | USED OIL                   |
| 42.0        |           |          | WASTE OIL                  | 0001075     | WASTE OIL                  | WASTE OIL                  |
| 4,192.0     |           |          | COMBUSTIBLE LIQUID, N.O.S. | 0003063     | COMBUSTIBLE LIQUID, N.O.S. | COMBUSTIBLE LIQUID, N.O.S. |
| 425.0       |           |          | WASH WATER                 | 0005468     | WASH WATER                 | WASH WATER                 |
| 495.0       |           |          | FIXER                      | 0005469     | FIXER                      | FIXER                      |
| 350.0       |           |          | GREASE                     | 0005478     | GREASE                     | GREASE                     |
| 265.0       |           |          | SOIL                       | 0005479     | SOIL                       | SOIL                       |
| 12,130.0    |           |          | INK                        | 0005480     | INK                        | INK                        |
| 46,492.0    |           |          | OILY SLUDGE                | 0005544     | OILY SLUDGE                | OILY SLUDGE                |
| 6,390.0     |           |          | NON-REGULATED              | 0005585     | NON-REGULATED              | NON-REGULATED              |
| 27,450.0    |           |          | DILY WATER                 | 0005776     | DILY WATER                 | DILY WATER                 |
| 1,625.0     |           |          | NON REGULATED              | 0007187     | NON REGULATED              | NON REGULATED              |
| 979.0       |           |          | NON REGULATED              | 0007743     | NON REGULATED              | NON REGULATED              |
| 7,075.0     |           |          | NON REGULATED              | 0023136     | NON REGULATED              | NON REGULATED              |
| 1,560.0     |           |          | NON REGULATED              | 0023138     | NON REGULATED              | NON REGULATED              |
| 6,035.0     |           |          | NON REGULATED              | 0023149     | NON REGULATED              | NON REGULATED              |
| 6,910.0     |           |          | NON REGULATED              | 0025091     | NON REGULATED              | NON REGULATED              |
| 3,202.0     |           |          | NON REGULATED              | 0033262     | NON REGULATED              | NON REGULATED              |
| 1,009.0     |           |          | NON REGULATED              | 0033264     | NON REGULATED              | NON REGULATED              |
| 1,510.0     |           |          | NON REGULATED              | 0033240     | NON REGULATED              | NON REGULATED              |
| 5,025.0     |           |          | NON REGULATED              | 0037072     | NON REGULATED              | NON REGULATED              |
| 2,900.0     |           |          | NON REGULATED              | 0038033     | NON REGULATED              | NON REGULATED              |
| 2,104.0     |           |          | NON REGULATED              | 0038690     | NON REGULATED              | NON REGULATED              |
| 2,000.0     |           |          | NON REGULATED              | 0051785     | NON REGULATED              | NON REGULATED              |
| 1,403,199.0 |           |          | NON REGULATED              | 0115325     | NON REGULATED              | NON REGULATED              |
|             |           |          | COMBUSTIBLE LIQUID, N.O.S. | 0220137     | COMBUSTIBLE LIQUID, N.O.S. | COMBUSTIBLE LIQUID, N.O.S. |
| 50,469.0    |           |          | USED OIL AND WATER MIXTURE | 0000850     | USED OIL AND WATER MIXTURE | USED OIL AND WATER MIXTURE |
| 1,148,261.0 |           |          | USED OIL                   | 0000927     | USED OIL                   | USED OIL                   |
| 12,657.0    |           |          | USED OIL                   | 0001001     | USED OIL                   | USED OIL                   |
| 53,320.0    |           |          | USED OIL                   | 0001002     | USED OIL                   | USED OIL                   |
| 42.0        |           |          | WASTE OIL                  | 0001075     | WASTE OIL                  | WASTE OIL                  |
| 4,192.0     |           |          | COMBUSTIBLE LIQUID, N.O.S. | 0003063     | COMBUSTIBLE LIQUID, N.O.S. | COMBUSTIBLE LIQUID, N.O.S. |
| 425.0       |           |          | WASH WATER                 | 0005468     | WASH WATER                 | WASH WATER                 |
| 495.0       |           |          | FIXER                      | 0005469     | FIXER                      | FIXER                      |
| 350.0       |           |          | GREASE                     | 0005478     | GREASE                     | GREASE                     |
| 265.0       |           |          | SOIL                       | 0005479     | SOIL                       | SOIL                       |
| 12,130.0    |           |          | INK                        | 0005480     | INK                        | INK                        |
| 46,492.0    |           |          | OILY SLUDGE                | 0005544     | OILY SLUDGE                | OILY SLUDGE                |
| 6,390.0     |           |          | NON-REGULATED              | 0005585     | NON-REGULATED              | NON-REGULATED              |
| 27,450.0    |           |          | DILY WATER                 | 0005776     | DILY WATER                 | DILY WATER                 |
| 1,625.0     |           |          | NON REGULATED              | 0007187     | NON REGULATED              | NON REGULATED              |
| 979.0       |           |          | NON REGULATED              | 0007743     | NON REGULATED              | NON REGULATED              |
| 7,075.0     |           |          | NON REGULATED              | 0023136     | NON REGULATED              | NON REGULATED              |
| 1,560.0     |           |          | NON REGULATED              | 0023138     | NON REGULATED              | NON REGULATED              |
| 6,035.0     |           |          | NON REGULATED              | 0023149     | NON REGULATED              | NON REGULATED              |
| 6,910.0     |           |          | NON REGULATED              | 0025091     | NON REGULATED              | NON REGULATED              |
| 3,202.0     |           |          | NON REGULATED              | 0033262     | NON REGULATED              | NON REGULATED              |
| 1,009.0     |           |          | NON REGULATED              | 0033264     | NON REGULATED              | NON REGULATED              |
| 1,510.0     |           |          | NON REGULATED              | 0033240     | NON REGULATED              | NON REGULATED              |
| 5,025.0     |           |          | NON REGULATED              | 0037072     | NON REGULATED              | NON REGULATED              |
| 2,900.0     |           |          | NON REGULATED              | 0038033     | NON REGULATED              | NON REGULATED              |
| 2,104.0     |           |          | NON REGULATED              | 0038690     | NON REGULATED              | NON REGULATED              |
| 2,000.0     |           |          | NON REGULATED              | 0051785     | NON REGULATED              | NON REGULATED              |
| 1,403,199.0 |           |          | NON REGULATED              | 0115325     | NON REGULATED              | NON REGULATED              |
|             |           |          | COMBUSTIBLE LIQUID, N.O.S. | 0220137     | COMBUSTIBLE LIQUID, N.O.S. | COMBUSTIBLE LIQUID, N.O.S. |

DATE: 11/08/04  
PAGE: 583  
PRINT LOC: 510002

SAFETY-KLEEN SYSTEMS, INC.  
FACILITY WASTE REPORT

FED ID: 1100000410 SAFETY-KLEEN SYSTEMS, INC. 0-502-64  
REG BY: MARGA OB WIERZBICKI,  
NOT TO BE USED AS SOLE SOURCE FOR REPORTING PURPOSES.

EAST ST. LOUIS IL 62207

1700 S. 20TH ST. - B

SAFETY-KLEEN SYSTEMS, INC. 1700 S. 20TH ST. - B  
1100000410  
12-20451133

HAZL/ADU/EEB/IDS

|      |         |   |          |
|------|---------|---|----------|
| NONE | 0005469 | WASH WATER                              | 425.00   |
| NONE | 0005478 | FIXER                                   | 495.00   |
| NONE | 0005479 | GREASE                                  | 350.00   |
| NONE | 0005483 | SOIL                                    | 265.00   |
| NONE | 0005489 | INK                                     | 12.1300  |
| NONE | 0005544 | OILY SLUDGE                             | 46.4960  |
| NONE | 0005586 | SLUDGE                                  | 6.6880   |
| NONE | 0005776 | NON-REGULATED OILY WATER                | 27.3900  |
| NONE | 0007187 | NON-REGULATED WASTE LIQUID (WASHWATER)  | 1.0000   |
| NONE | 0007743 | NON-REGULATED LIQUID                    | 3.0000   |
| NONE | 0023138 | NON-REGULATED MATERIAL                  | 1.0000   |
| NONE | 0023149 | NON-REGULATED MATERIAL (MINERAL OIL)    | 6.0000   |
| NONE | 0023513 | NON-REGULATED MATERIAL (OIL SLUDGE)     | 7.9710   |
| NONE | 0025091 | NON-REGULATED LIQUID (OIL SLUDGE)       | 3.7250   |
| NONE | 0033322 | NON-REGULATED MATERIAL                  | 3.2020   |
| NONE | 0033324 | NON-REGULATED MATERIAL                  | 1.0090   |
| NONE | 0037072 | NON-RCRA/NON-DOE REGULATED MATERIAL     | 1.5100   |
| NONE | 0038336 | NON-RCRA HAZARDOUS WASTE LIQUID (DIESE) | 5.0250   |
| NONE | 0038690 | NON-REGULATED MATERIAL                  | 3.1040   |
| NONE | 0051725 | NON-REGULATED MATERIAL                  | 2.0000   |
| NONE | 0115325 | NON-RCRA HAZARDOUS WASTE LIQUID         | 1.403199 |
| NONE | 0220137 | COMBUSTIBLE LIQUID, N.O.S.              | 0.0000   |

CHRISTOPHER N. CAHNOVSKY, CHMM  
Illinois Environmental Protection Agency  
Bureau of Land - Field Operations Section  
2009 Mall Street Collinsville, Illinois 62234  
618/346-5120

## WORK EXPERIENCE

Senior Public **Service** Administrator - Illinois Environmental Protection Agency.  
August 2001 to Present.

Regional Manager for the Bureau of Land - Field Operations Section's Collinsville Regional Office. Supervise eight technical staff and one student intern.

Responsible for the planning, direction, organization, control and implementation of Agency policies and procedures pertaining to all Bureau of Land program areas in the operations of the Collinsville Regional Field Office.

Responsible for the evaluation of technical, scientific, regulatory and legal reports and documents.

Responsible for making recommendations on pollution control, **compliance** and enforcement issues.

Provide technical assistance and testimony to support civil and criminal enforcement cases brought by the Illinois Attorney General and local State Attorneys before the Illinois Pollution Control Board and Illinois Circuit Court.

Responsible for solid waste programs, hazardous waste programs for a nine county region. These counties include St. Clair, Madison, Randolph, Monroe, Clinton, Marion, Fayette, Bond and Washington. The Collinsville Region has a large population and a significant industrial base.

Supervise the Madison and St. Clair County's solid waste enforcement grant and delegated agreement.

Project Manager for the Hartford Free Phase Hydrocarbon Plume investigation and remediation project in Hartford, Illinois. Responsible for State oversight of the groundwater and vapor intrusion investigation of a large plume of hydrocarbons underneath the northern part of the Village of Hartford. Over 200 homes are affected. Responsible for responding to vapor complaints at all hours of the day and night, residential evaluation and monitor. Attend public meetings and press conferences. Intimately deal with the public on vapor intrusion issues in their home. Responsible for State oversight in negotiating with the responsible parties in finding a final remedy for the groundwater and vapor intrusions issues in Hartford, Illinois.

CHRISTOPHER N. CAHNOVSKY

PAGE 3 OF 3

Fire Fighter - Captain/Emergency Medical Technician Alhambra Community Fire Department, Alhambra, Illinois 1998 to 2002. Responsible for the leadership and command of 27 firefighters in many types of emergency situations, including fire, rescue and medical emergencies. Serve as incident command in absents of the Fire Chief and Assistant Chief. Relied upon to make decisions in stressful emergency situations. Serve as Infection Control Officer who is responsible for the administration and implementation of the Department's Blood Borne Pathogen program. Wrote a \$190,000 grant application to the Federal Emergency Management Agency. Northwest St. Clair County Fire Protection District, Belleville, Illinois. August 1990 to January 1995. Served as Chairperson of the Safety Committee.

## ORGANIZATIONS

Gateway Society of Hazardous Materials Managers - 1995 to Present. The GSHMM is a non-for-profit environmental organization with over 160 members. Served as President for 2002-2003. Served as President-Elect in 2001, Secretary 2000 and Director at Large and Chairperson of the Meetings and Public Relations Committee 1998 through 1999.

Lodge of Ondessonk - 1977 to Present. An organization affiliated with Camp Ondessonk in Ozark, Illinois. The Lodge of Ondessonk is the Honor Camping Societies of Camp Ondessonk. The purpose of the Lodge is to promote, through outstanding citizenship, the ideals of Christian living and the interest of Camp Ondessonk, both at Camp Ondessonk and in the community.

## AWARDS

**2002** Young CHMM of the Year – Academy of Hazardous Materials Managers. Given to the outstanding, peer nominated young (35 years of age or younger) Academy member, who, during the previous year, has made significant accomplishments in the Environmental, Health & Safety field while promoting the vision & mission of the Academy.

**2002** Champion of Excellence - Academy of Hazardous Materials Managers

American Bottoms Conservancy Clean Water Hero **2002** – Outstanding efforts in the discovery, enforcement and prosecution of the illegal discharge into the Waters of the United States by Chemetco, Inc.

Award for Public Service from the U.S. Department of Justice December 5, 1997. This award was for assisting law enforcement and the Department of Justice in the criminal prosecution and conviction in United States v. Terminal Railroad Association of St. Louis.

STATE OF ILLINOIS            )  
  )  
COUNTY OF SANGAMON        )

**PROOF OF SERVICE**

I, the undersigned, on oath state that I have served the attached ADDITIONAL TESTIMONY OF THEODORE J. DRAGOVICH and TESTIMONY OF CHRISTOPHER N. CAHNOVSKY upon the persons to whom they are directed, by placing a copy of each in an envelope addressed to:

Dorothy Gunn, Clerk,  
Illinois Pollution Control Board  
James R. Thompson Center  
100 W. Randolph, Suite 11-500  
Chicago, Illinois 60601

William Richardson, Chief Legal Counsel  
Office of Legal Counsel  
Illinois Dept. of Natural Resources  
One Natural Resources Way  
Springfield, Illinois 62702-1271

Matthew J. Dunn  
Environmental Bureau Chief  
Office of the Attorney General  
James R. Thompson Center  
100 W. Randolph, 12<sup>th</sup> Floor  
Chicago, Illinois 60601

Tim Fox, Hearing Officer  
Illinois Pollution Control Board  
James R. Thompson Center  
100 W. Randolph St.  
Suite 11-500  
Chicago, Illinois 60601

Claire A. Manning  
Brown, Hay & Stephens, LLP  
700 First Mercantile Bank Building  
205 South Fifth St., P.O. Box 2459  
Springfield, Illinois 62705-2459

Deirdre K. Himer, Executive Director  
Illinois Environmental Regulatory Group  
3150 Roland Avenue  
Springfield, Illinois 62703

and mailing it by First Class Mail from Springfield, Illinois on June 15<sup>th</sup>, 2006, with sufficient postage affixed

Melinda A. Brant

SUBSCRIBED AND SWORN TO BEFORE ME  
This 15<sup>th</sup> day of June, 2006.

Blenda Boehner  
Notary Public

