

THIROS AND STRACCI
PROFESSIONAL CORPORATION
ATTORNEYS AT LAW
WESTON COURT
200 EAST 90TH DRIVE
MERRILLVILLE, INDIANA 46410-8102
TELEPHONE (219) 769-1600
FAX NUMBER (219) 738-3769

NICK J. THIROS
MARK A. THIROS
JAMES N. THIROS
PAUL G. STRACCI

STEPHEN C. BOWER
T. EDWARD PAGE
ALISON L. BENJAMIN
SAMUEL G. VAZANELLIS*
*ALSO ADMITTED IN ILLINOIS

October 6, 2009

United States Environmental
Protection Agency
Region 5
Attn: Spiros Bourgikos
77 West Jackson Blvd., LR-8J
Chicago, Illinois 60604

RE: Summit, Inc.

Dear Mr. Bourgikos:

Please be advised that our law firm represents Summit, Inc. Enclosed please find Summit's response to your request for information dated September 15, 2009.

Should you have any questions or concerns, please do not hesitate to contact me.

Very truly yours,

THIROS AND STRACCI



BY: ALISON L. BENJAMIN

ALB/clk
Enclosures

RESPONSE TO EPA REQUEST FOR INFORMATION

- 1. Identify all persons consulted in preparing the answers to this Request for Information. Provide the full name and title for each person identified.**

ANSWER:

Peter Coulopoulos, General Manager, Summit, Inc.
Dennis Bloom, Shredder Manager, Summit, Inc.
Jamie Mulcahey, Supervisor, Summit, Inc.
Joe Rizer, Comptroller, Summit, Inc.

- 2. Provide a copy of all waste determinations performed on liquids removed from containers (e.g., drums, buckets) and tanks from March 19, 2009, to the present.**

ANSWER:

Summit, Inc., believes that Beaver Oil possesses all relevant waste determinations.

For the liquids removed from your site from March 19, 2009 to the date of receipt of this request provide the following information:

- a. **Copies of all results of physical and chemical tests performed on the liquids;**
- b. **Copies of all waste determinations based on knowledge of the hazard characteristic of the waste in light of the materials or processes used;**
- c. **For each shipment of liquids, identify the transporter/marketer/wholesaler/retailer/seller/broker of the liquids;**
- d. **For each shipment, what facility was designated to receive the shipment?**
- e. **Provide any and all documents related to each shipment of liquids including but not limited to Uniform Hazardous Waste Manifest, invoice, work order, job ticket, bill of lading/tracking document and other similar shipping documents.**

ANSWER:

Summit, Inc., believes that Beaver Oil possesses all relevant waste determinations.

Date	Origin	Hauler	Type	Ticket#	Gallons
3/21/09	Beaver	Beaver	Oil	28672	3,000
3/23/09	Beaver	Beaver	Fuel	184548	2,650
4/09/09	Beaver	Beaver	Oil	28941	1,800

Date	Origin	Hauler	Type	Ticket#	Gallons
4/28/09	Beaver	Beaver	Oil	28997	400
6/29/09	Beaver	Beaver	Oil	28704	400
6/29/09	Beaver	Beaver	Fuel	186038	800
7/30/09	Beaver	Beaver	Fuel	180834	3,000
8/05/09	Beaver	Beaver	Oil	29786	350
9/16/09	Beaver	Beaver	AntiFreeze/ Coolant	30039	400
9/16/09	Beaver	Beaver	Oil	30029	230

All other relevant documents are enclosed herewith.

3. Identify the Summit, Inc. employee responsible for compliance with the Resource Conservation and Recovery Act.

ANSWER:

Peter Coulopoulos.

4. For each shipment identified in response to question 2 above, how was the shipment disposed or recycled (e.g., made into a fuel to be burned for energy recovery, processed for reuse)?

ANSWER:

Recycled at Beaver Oil's facility.

5. Have all drums containing liquid wastes from the area near Crusher 1 and the gasoline recovery shed been pumped out between March 18, 2009, and the present?

ANSWER:

Yes.

6. If the answer to request 5 is no, describe the drums that have not been pumped out and their location(s) since March 18, 2009.

ANSWER:

N/A.

7. **If the answer to request 5 is yes, how were the liquids managed (stored, treated, transported, etc.) after they were pumped out of the drums?**

ANSWER:

The liquids were pumped from the 55 gallon drums into the double walled holding tank inside of the containment prior to being picked up by Beaver Oil. Beaver Oil pumped the liquids out of the tank and took the liquids to their facility.

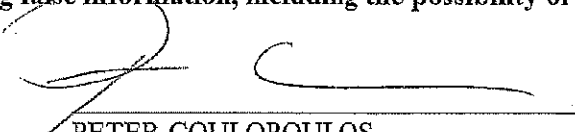
8. **On March 18, 2009, EPA collected samples from drums located at the Gasoline Recovery Area. Attached are pictures of those drums. For those drums answer the following questions:**
- a. **specify the contents of the drums;**
 - b. **where did the contents of the drums come from;**
 - c. **when were the contents placed in the drums;**
 - d. **provide copies of all waste determination(s) made related to those drums and their contents;**
 - e. **what did you do with the drums and their contents after March 18, 2009;**
 - f. **provide copies of all manifest, shipping and billing documents related to the off-site shipment of those drums or their contents;**
 - g. **provide copies of all sampling or analytical results of the contents of the drums.**

ANSWER:

Waste Oil. The waste oil came from the drain pad. Since waste oil was last picked from the yard on March 5, 2009, it is presumed that the waste oil was pumped into the drums from March 5, 2009 through March 18, 2009. After March 18, 2009, the waste oil was picked up by Beaver Oil. Summit, Inc., shredded the drums after the waste oil was transferred into the holding tank. See enclosed tickets and manifests.

9. **Provide the following certification by a responsible corporate officer:**

I certify under the penalty of law that I have examined and am familiar with the information submitted in responding to this information request for production of documents. Based on my review of all relevant documents and inquiring of those individuals immediately responsible for providing all relevant information and documents, I believe that the information submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.


PETER COULOPOULOS
General Manager, Summit, Inc.

BEAVER OIL CO. INC.

6037 LENZI AVE. • HODGKINS, IL 60525 • 708/354-4040

CUSTOMER

SUMMIT INC
6901 CHICAGO AVE,
GARY IN 46406

RECEIVING FACILITY

.BEAVER OIL CO INC
6037 LENZI AVE
HODGKINS IL 60525

INVOICE DATE

04/01/2009

NO.

152262

DATE SHIPPED	HAULER	YOUR ORDER NO.	CUSTOMER NO.	TERMS	
03/21/2009	.BEAVER OIL CO INC.		S300GRB	NET / 15	
QUANTITY	DESCRIPTION		RATE	AMOUNT	
750	GAL	REMOVED OIL	-\$0.40	\$-300.00	
2,250	GAL	REMOVED WATER	\$0.18	\$405.00	
<p>MANIFEST # GR TKT # 28672</p> <p>JOB SITE: SUMMIT INC</p> <p> 6901 CHICAGO AVE</p> <p> GARY IN 46406</p>					
THANK YOU - WE DO APPRECIATE YOUR BUSINESS				INVOICE TOTAL	\$105.00

An Interest Charge of 1 1/2% Per Month Will Be Added For Invoices Not Paid By Terms.

28612

ALCOHOL FREE

TO: Summit Int'l
FROM: Summit Inc
8901 Chicago Ave
Gary IN 46405

RE: Beaver Oil Co Inc
Beaver Oil Co Inc - Hodgkins

DATE: _____
TIME: _____

3000-6

Driver: Paul
Down Road Place
with R/T - H/O - 5000 Gals

TIME: 9:30
Customer: _____

Signature: _____

THANK YOU - WE

TOTAL

aid By Terms.

CX 000744