



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF

C-14J

March 9, 2006

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Raymond Vintika
Vice President
Beaver Oil Company, Inc.
6037 Lenzi Avenue
Hodgkins, IL 60525

Re: Issuance of Administrative Order under Section 113 (a) of the Federal Clean Air Act (42 U.S.C. § 7413(a)), Notice of Violation under Resource Conservation and Recovery Act, and Findings of Violation and Order of Compliance Under Section 309(a) of the Clean Water Act (33 U.S.C § 1319(a)) to Beaver Oil Company, Inc. Facility in Hodgkins, IL

Dear Mr. Vintika:

The U.S. Environmental Protection Agency (U.S. EPA), Region 5, is issuing the above referenced Notice and Orders to the Beaver Oil Company (Beaver Oil or Respondent) concerning its facility located at 6037 Lenzi Avenue, Hodgkins, Illinois (the Beaver Facility or Facility).

This action follows a multimedia inspection conducted by U.S. EPA at the Beaver Facility on April 26-30, 2004. During the inspection, U.S. EPA staff reviewed the compliance status of operations at the Beaver facility with respect to the requirements of applicable environmental laws and regulations. The Agency followed up this inspection with a formal multimedia Request for Information sent to Beaver on February 28, 2005. As you will see in the enclosed documents, U.S. EPA alleges violations of certain applicable requirements at the Beaver facility for which compliance actions are required. U.S. EPA also orders the production of certain information and documents previously requested but not provided by Beaver at the inspection or in response to the above referenced Information Request.

We encourage you to give this matter your immediate attention. The enclosed notice and orders are separate actions, so please review the individual instructions in each document to determine by when you are instructed to take action and/or respond. Questions concerning the contents of the attached should be referred to the individual contacts listed in each document.

If you have any other questions, please call me at 312-886-4273.

Sincerely,

Debra A. Klassman for

Thomas Martin
Associate Regional Counsel

Enclosures

cc: Elizabeth Harvey (w/encl.)
Swanson, Martin & Bell

William Stuba (w/encl.)
Metropolitan Water Reclamation District of Greater Chicago

Roger Callaway (w/encl.)
Illinois Environmental Protection Agency

Julie Armitage, (w/encl.)
Illinois Environmental Protection Agency

Todd Marvell (w/encl.)
Illinois Environmental Protection Agency

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5**

IN THE MATTER OF:)
)
Beaver Oil Company, Inc.) **ADMINISTRATIVE ORDER**
)
Proceeding Under) **EPA-5-06-113(a) IL-02**
Section 113(a)(3) of)
the Clean Air Act,)
42 U.S.C. § 7413(a)(3))
)

Administrative Order

1. The Director of the Air and Radiation Division, United States Environmental Protection Agency (U.S. EPA), Region 5, is issuing this Order to Beaver Oil Company, Inc. (Beaver) under Section 113(a)(3) of the Clean Air Act (Act), 42 U.S.C. § 7413(a)(3).

Statutory Authority

2. The Administrator of U.S. EPA may require any person who owns or operates an emission source to provide information required by the Administrator under Section 114(a)(1) of the Act, 42 U.S.C. § 7414(a)(1). The Administrator has delegated this authority to the Director of the Air and Radiation Division.

3. Under Section 113(a)(3) of the Act, 42 U.S.C. § 7413(a)(3), the Administrator of U.S. EPA may issue an order requiring compliance to any person who has violated or is violating any requirement of an information request issued under Section 114 of the Act (Section 114 Request). The Administrator has delegated this authority to the Director of the Air and Radiation Division.

Findings

4. Beaver owns and operates a Central Waste Treatment facility (facility) located at 6037 Lenzi Avenue, Hodgkins, Illinois.
5. Beaver Oil owns or operates an "emission source" within the meaning of Section 114(a)(1) of the Act, 42 U.S.C. § 7414(a)(1).
6. On February 28, 2005, the Director of the Water Division, U.S. EPA, Region 5, issued a Multi-Media Request for Information to Beaver which includes a request pursuant to Clean Air Act Section 114(a), 42 U.S.C. § 7414(a). Exhibit 1 of this Order is a copy of the Section 114 Request included in the Multi-Media Request for Information.
7. The Request required Beaver to submit information concerning the air sources at the facility, including but not limited to the waste streams, the hazardous tanks, the non-hazardous tanks and the boilers. The information was required to be submitted within 45 calendar days of receipt.
8. The information requested is reasonably related to the purpose of determining whether Beaver is in violation of Clean Air Act standards relating to its facility.
9. Beaver received the Section 114 Request March 2, 2005.
10. Beaver violated the Section 114 Request by failing to provide information and documents requested in U.S. EPA's Request for Information. Specifically, Beaver's response U.S. EPA's request failed to submit the information and documents listed in Exhibit 2.

Compliance Program

11. Beaver must comply with all requirements of the Section 114 Request. Specifically, Beaver must submit complete answers to the questions it failed to answer and provide all the missing documents specified in Exhibit 2 within 20 days of receipt of this Order.
12. Beaver must send the response, information and

documentation required by this Order to:

Compliance Tracker (AE-17J)
Air Enforcement and Compliance Assurance Branch
U.S. EPA, Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604.

General Provisions

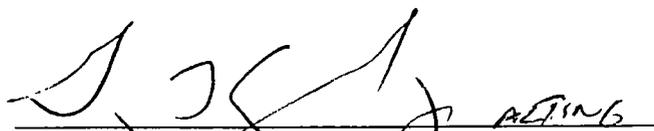
13. This Order does not affect Beaver's responsibility to comply with other local, state, and federal laws and regulations.
14. This Order does not restrict U.S. EPA's authority to enforce Section 114 of the Act, or any other section of the Act.
15. Nothing in this Order limits U.S. EPA's authority to seek appropriate relief, including penalties under Section 113 of the Act, 42 U.S.C. § 7413, for Beaver's violations of the Section 114 Request.
16. Failure to comply with this Order may subject Beaver to penalties of up to \$32,500 per day for each violation under Section 113 of the Act, 42 U.S.C. § 7413, and 69 Fed. Reg. 7121 (Feb. 13, 2004) (amending 40 C.F.R. Part 19).
17. The terms of this Order are binding on Beaver, its assignees and successors. Beaver must give notice of this Order to any successors in interest, prior to transferring ownership, and must simultaneously verify to U.S. EPA, at the above address, that Beaver has given the notice.
18. This Order is not subject to the Paperwork Reduction Act, 44 U.S.C. § 3501 et seq., because it seeks collection of information by an agency from specific individuals or entities as part of an administrative action or investigation. To aid in our electronic record keeping efforts, please provide your response to this Order without staples. Paper clips, binder clips, and 3-ring binders are acceptable.
19. U.S. EPA may use any information submitted under this Order in an administrative, civil, or criminal action.

20. Section 113(a)(4) of the Act, 42 U.S.C. § 7413(a)(4), states that an Order shall not take effect until the person to whom it is issued has had an opportunity to confer with U.S. EPA about the alleged violation. Therefore, U.S. EPA is giving Beaver an opportunity to confer with U.S. EPA concerning this Order. Beaver may schedule a conference with U.S. EPA by calling Thomas Martin at 312 886-4273 within 10 days of Beaver's receipt of this Order.

21. This Order is effective upon signature of the Director of the Air and Radiation Division.

3/9/06

Date



Stephen Rothblatt, Director
Air and Radiation Division

Enclosures

Protecting the environment is everyone's responsibility. Help EPA fight pollution by reporting possible harmful environmental activity. To do so, visit EPA's website at <http://www.epa.gov/compliance/complaints/index.html>

Exhibit 1



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF

FEB 2 2005

WC-15J

CERTIFIED MAIL 7001 0320 0006 0292 4901
RETURN RECEIPT REQUESTED

Mr. Raymond Vintika
Vice President
Beaver Oil Company, Inc.
6037 Lenzi Avenue
Hodgkins, IL 60525

Re: Multi-Media Request for Information

Dear Mr. Vintika:

The U.S. Environmental Protection Agency (U.S. EPA), Region 5, hereby requires Beaver Oil Company (Beaver Oil or Respondent) to submit certain information about its facility located at 6037 Lenzi Avenue, Hodgkins, Illinois (the Beaver Facility or Facility).

This Request for Information follows a multi-media inspection that was conducted by Carol Staniec and staff at the Beaver Facility on April 26-30, 2004. During the inspection, Ms. Staniec and staff reviewed the compliance status of operations at the Beaver Facility with respect to the requirements of the Clean Air Act (CAA), 42 U.S.C. §§ 7401-7642; Clean Water Act (CWA), 33 U.S.C. §§ 1251-1387; the Resource Conservation and Recovery Act, as amended (RCRA), 42 U.S.C. §§ 690-6991i; and the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), 42 U.S.C. §§ 9601-9675; the Spill Prevention Control and Countermeasure law and regulations (SPCC), 33 U.S.C. § 1321 and 40 C.F.R. § 112; and the Underground Storage Tank (UST) law and regulations, 42 U.S.C. § 6991 and 40 C.F.R. Part 280 (collectively, the "statutes").

The Administrator of U.S. EPA is authorized to require Beaver Oil to respond to this Information Request pursuant to CAA Section 114(a), 42 U.S.C. § 7414(a); CWA Sections 308(a) and 311(m)(2), 33 U.S.C. §§ 1318(a) and 1321(m)(2); RCRA Sections 3007 and 9005, 42 U.S.C. §§ 6927 and 6991d; and CERCLA Section 104(e), 42 U.S.C. § 9604(e). Authority to require submittal of information under each of these statutes has been delegated to the Regional Administrator. Authority to require submittal of information under the CWA has been further delegated to the Director of the Water Division. Authority under the other statutes has been further delegated to the Regional Counsel.

We encourage you to give this matter your immediate attention. The information required by the questions in Attachment 3 must be submitted within 45 calendar days of receipt of this Request. Definitions of some of the terms used in this Information Request are in Attachment 1. Instructions to guide you in the preparation of your response are in Attachment 2.

The information requested herein must be provided notwithstanding its possible characterization as confidential business information or trade secrets. You may, if you desire, assert a business confidentiality claim covering part or all of the information requested, in the manner described by 40 C.F.R. § 2.203(b). Information covered by such a claim will be disclosed by U.S. EPA only to the extent, and only by means of the procedures set forth in 40 C.F.R. Part 2, Subpart B [See 41 *Federal Register* 36902 *et seq.* (September 1, 1976); 43 *Federal Register* 4000 *et seq.* (December 18, 1985)]. If no such claim accompanies the information when it is received by U.S. EPA, it may be made available to the public by U.S. EPA without further notice to you. You should read carefully the above-cited regulations, together with the standards set forth in Section 308(b) of CWA; Section 114(c) of CAA; Sections 3007(b) and 9005(b) of RCRA; and Section 104(e)(7) of CERCLA (33 U.S.C. § 1318(b); 42 U.S.C. § 7414(c); 42 U.S.C. §§ 6927(b) and 6991d(b); and 42 U.S.C. § 9604(e)(7), respectively) before asserting a business confidentiality claim, since certain categories of information are not properly the subject of such a claim, for example emission data, as defined in 40 C.F.R. § 2.301(a)(2) (CAA Section 114(c)), effluent data, as defined in 40 C.F.R. § 2.302(a)(2) (CWA Section 114(c)), and certain health and safety effects data (CERCLA Section 104(e)(7)).

Compliance with this information request is mandatory. The statutes provide that a failure to answer the questions fully and truthfully, and within the prescribed time frame, can result in an enforcement action and penalties.

You must submit all requested information under an authorized signature certifying that the information is true, accurate and complete to the best knowledge of the certifying official after due inquiry. Knowingly providing false information may be actionable under the statutes and 18 U.S.C. §§ 1001 and 1341.

U.S. EPA has the authority to use the information that it requests in an administrative, civil or criminal action.

This Information Request is not subject to the approval requirements of the Paperwork Reduction Act of 1995, 44 U.S.C. § 3501, *et seq.*

Return your response within 45 calendar days to:

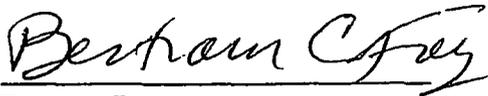
Ms. Carol Staniec
Pretreatment Program Enforcement Manager
Water Division (WC-15J)

U.S. Environmental Protection Agency
77 West Jackson Boulevard
Chicago, Illinois 60604

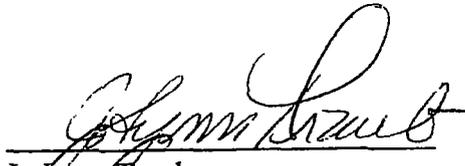
If you have technical questions, please direct them to Ms. Carol Staniec, Pretreatment Program Enforcement Manager, Water Division, Water Enforcement and Compliance Assurance Section, at (312) 886-1436. If you have legal questions, please call Mr. Thomas Martin, Associate Regional Counsel, at (312) 886-4273.

We appreciate your assistance and look forward to your prompt response to this Information Request.

Sincerely,



Bertram Frey
Bertram Frey
Acting Regional Counsel



Jo Lynn Traub
Jo Lynn Traub
Director, Water Division

Enclosures

cc: Mr. William Stubba
Metropolitan Water Reclamation District of Greater Chicago
100 East Erie St
Chicago, IL 60611

Mr. Roger Callaway, Manager
Illinois Environmental Protection Agency
Division of Water Pollution Control
Compliance Assurance Section
1021 North Grand Avenue East
Mail Code #19
P.O. Box 19276
Springfield, IL 62794-9276

ATTACHMENT 1
DEFINITIONS

For the purpose of the Instructions and the Information Request set forth herein, the following definitions shall apply:

1. The term "you" or "Respondent" means "Beaver Oil", the addressee of the Information Request, the addressee's officers, managers, employees, contractors, trustees, and agents.
2. "Beaver Oil Facility", "Beaver Facility" or the "Facility" mean the entire facility currently operated by the Respondent at 6037 Lenzi Avenue, Hodgkins, Illinois.
3. The term "person" as used herein, in the plural as well as the singular, shall mean any natural person, firm, contractor, corporation, partnership, trust or governmental entity, unless the context indicates otherwise.
4. The term "identify" means, with respect to a natural person, to set forth the person's full name, present or last known business address and telephone number, present or last known home address and telephone number, and present or last known job title, position or business.
5. The term "identify" means, with respect to a corporation, partnership, business trust or other association or business entity (including a sole proprietorship), to set forth its full name, address, legal form (e.g., corporation, partnership, etc.), organization, if any, and a brief description of the business.
6. The term "identify" means, with respect to a document, to provide its customary business description, its date, ID number if any (e.g., invoice number, purchase order number, manifest number), the identity of its author, addressee and recipient, and the substance of the subject matter.
7. The term "hazardous substance" shall have the same definition as that contained in Section 101(14) of CERCLA, including mixtures of hazardous substances with other substances, including petroleum products.
8. "And" as well as "or" shall be construed either conjunctively or disjunctively as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside their scope.
9. All terms not defined herein shall have their ordinary meaning unless such terms are defined in regulations promulgated pursuant to such statutes; in which case the regulatory definitions shall apply. The following is a list of questions (from Attachment 3) and the regulatory statute that applies:

- a. For questions 10 through 15, such terms are defined in the CAA;
- b. For questions 16 through 34, such terms are defined in the CWA;
- c. For questions 35 through 50, such terms are defined in RCRA;
- d. For questions 51 through 54, such terms are defined in CERCLA;
- e. For questions 55 through 56, such terms are defined in the SPCC law; and
- f. For question 57 through 63, such terms are defined in the UST law.



ATTACHMENT 3
QUESTIONS

GENERAL

1. Identify the person(s) currently responsible for environmental issues at Beaver Oil. Also identify the corporate structure (names and titles) of Beaver Oil, including all persons in the Environmental Department, or equivalent, at Respondent's corporate headquarters.
2. For each question contained herein, identify each person responding to the question on behalf of Respondent, as well as each person consulted in the preparation of a response.
3. Identify all documentation consulted, examined, or referred to in the preparation of the answers to this request. Provide copies of all documents consulted, examined, or referred to in your response to this Information Request.
4. What is the monetary value of Respondent's annual income from volume of material handled?
5. How many employees are employed by Respondent at the Beaver Oil Facility? How many employees are employed by Respondent corporate-wide?
6. Please state the address and telephone number of the Respondent's headquarters and/or principal place of business.
7. Please describe in detail any enforcement actions (e.g. notices of violation, findings of violation, etc.) initiated by the Illinois EPA with respect to the Beaver Oil Facility. Provide copies of all documents describing, referencing or regarding each such enforcement action.
8. Provide copies of all documents describing, referencing, or regarding any and all citizen complaints received by Beaver Oil regarding the Beaver Facility for all programs since January 1, 2000. Include any records that document the response by Beaver Oil and any sample analysis conducted, if applicable.
9. List all Beaver facilities operating in the United States and the extent to which oil is transferred to or from such facilities. In particular, state whether and to what extent the Hodgkins, Illinois Facility transfers or receives used oil and/or other material from Beaver Oil Facility in Gary, Indiana.

CLEAN AIR ACT

10. Please provide a list, from the period of January 1, 2000, until the day of receipt of this

request, of all hazardous and non-hazardous waste streams transported to and generated from the Beaver Oil Facility. The list must include: name of generator, generator's Standard Industrial Code (SIC), length of time in business with generator, amount of waste received and treated (in pounds or gallons or both), and chemical/physical data such as density and chemical analysis for benzene, toluene, ethylbenzene, xylenes, and other organic compounds for each waste stream.

11. If Beaver conducts on-site waste analysis for the organic compounds listed in paragraph 10 above, indicate the type of equipment used and analytical methods.
12. Provide the following information for the carbon canisters and condensers used for controlling volatile organic compounds in the hazardous waste building:
 - a. How is the control efficiency calculated and how often?
 - b. How often is the carbon replaced?
 - c. Does Beaver Oil regenerate the used carbon?
 - d. Include the name(s) and location(s) of the regenerator(s), the average size of the shipment(s) and the time elapsed, in days, between shipments.
13. For the two scrubbers operated at the Beaver Oil Facility, provide the date of construction and installation, purpose, and control efficiency.
14. Please provide the following information about tanks F-3, F-4, and T-39 at the Facility:
 - a. Dimensions;
 - b. Storage capacity (in gallons);
 - c. Exact date of construction/installation and cost;
 - d. Exact date of any physical change to these tanks. If a specific change occurred, please describe;
 - e. True vapor pressure of the fuel stored;
 - f. Average annual throughput (in pounds or gallons or both); and
 - g. Characteristic and type of waste typically stored.
15. Please provide the following information about the boilers operated at Beaver Oil:

- a. Firing rates (in MMBtu/hr);
- b. Type of fuel used, monthly amount, and the heat content (in BTU/lb);
- c. Any recent physical changes in the boilers (and/or changes in the type and amount of fuel used); and
- d. Sulfur content in the fuel.

CLEAN WATER ACT

16. Provide a complete description of all wastewater flow, including storm water, sanitary wastewater and process wastewater, from the Beaver Oil Facility. This description will include, but not be limited to, a diagram showing all sewer lines, sumps, bypass locations and collection, sampling, monitoring and discharge points, as well as a narrative explanation of the diagram. Include a mass balance analysis of the intake water against the water used in the process, evaporated or discharged.
17. Section 403.12(b) requires submittal of a Baseline Monitoring Report (BMR) to the Control Authority within 180 days after the effective date of a Categorical Pretreatment Standard. The effective date for 40 C.F.R. § 437 was January 22, 2001, and as a result a BMR was due July 21, 2001. At the time of the May 2004, U.S. EPA inspection, Beaver Oil had not submitted a BMR for the Beaver facility located in Hodgkins, Illinois. Please submit a completed BMR. The BMR must contain the following information, at a minimum:
 - a. The name and address of the Facility, including names of certified operator(s) and owner(s). Please include a copy of the operator's certification(s). Also include all certificate(s) that are applicable for the time frame of July 21, 2001 until the day of the receipt of the request;
 - b. A list of all environmental control permits held by or for the Beaver Oil Facility;
 - c. A brief description of the nature, average production rate and SIC for each operation(s) conducted by the Facility. Include a schematic process diagram which indicates all discharge points from the regulated, non-regulated and dilutional process waste streams to the POTW;
 - d. A description of the sampling locations, noted on the schematic process diagram referenced above in Request 17(c), above, used to show compliance with the categorical standards and with the limitations contained in the Metropolitan Water Reclamation District of Greater Chicago (MWRDGC) Sewer Use Ordinance;

- e. Flow measurement information for 1) regulated process streams discharged to the MWRDGC and for 2) dilutional waste streams that would necessitate the application of the combined waste stream formula to determine effluent limits;
 - f. A list of the pretreatment standards applicable to each regulated process waste stream and the results of pollutant concentrations and/or mass measurements in the discharge of each regulated process;
 - g. Beaver Oil's Statement of Certification concerning compliance or noncompliance with the Pretreatment Standards; and
 - h. If Beaver Oil cannot certify compliance, the BMR must contain a compliance schedule that describes the proposed actions and a timetable for completing those actions to achieve compliance with the standards.
18. For existing indirect dischargers, 40 C.F.R. § 437.41(a) requires submittal of an Initial Certification to the Control Authority by December 22, 2003. Beaver Oil had not submitted an Initial Certification at the time of the May 2004 U.S. EPA inspection for the Hodgkins, Illinois facility, and the Beaver Facility sampled the combined wastestreams rather than the individual streams, placing the facility under 40 C.F.R. 437 Subpart D- Multiple Wastestreams. Please submit an Initial Certification to the U.S. EPA, which includes the following [from Section 8.2 in Small Entity Compliance Guide to the CWT Effluent Limitations Guidelines and Pretreatment Standards (40 C.F.R. § 437) EPA 821-B-01-003, June 2001, a.k.a. CWT Guidance Manual (Attachment 6). The subcategories referred to in this question are: A- Metals Treatment and Recovery, B- Oils Treatment and Recovery, C- Organics Treatment and Recovery and D - Multiple Wastestreams]:
- a. A list/table describing the wastes that have been accepted for treatment from January 2003 to December 2003 and their appropriate subcategory classification (per Table 5-1 of the CWT Guidance Manual). For all waste streams not classified in Table 5-1, describe the decision process of how Beaver Oil placed that waste stream in a subcategory;
 - b. A list describing treatment systems and operating conditions for each waste subcategory; and
 - c. Information and supporting data establishing equivalent treatment (as required by Subpart D for facilities who combine their wastestreams). Equivalent treatment is defined "as a wastewater treatment system that gives comparable pollutant removals to the applicable technology selected as the basis for pretreatment standards." Table 3-1 in the CWT guidance manual lists the technologies which provide the basis for the CWT pretreatment standards. Comparable removals may

be measured by percent pollutant removals (listed in Table 8-3 & 8-4 of the CWT Compliance Guide) or journal references, treatability tests, or self-monitoring data. Please submit the information and supporting data establishing equivalent treatment.

19. A 90 Day Compliance Report was due to U.S. EPA on March 22, 2004, as required by 40 C.F.R. § 403.12(d). At the time of the May 2004 U.S. EPA inspection, Beaver Oil had not submitted this report. Please submit the 90 Day Compliance Report, which should include the following information:
 - a. The chemical name and concentration of all regulated pollutants in the Facility's regulated process waste streams;
 - b. The average and maximum daily flows of the regulated streams;
 - c. A statement of whether compliance is consistently being achieved, and if not,
 - d. What additional operation and maintenance and/or pretreatment is necessary to achieve compliance.
20. Describe, in detail, Beaver Oil's waste acceptance procedures, including examples of any sampling results or charts used in the process.
21. Describe in detail how wastewater is processed, including: (1) procedures used to determine the appropriate waste treatment, and (2) influent, intermediary (internal sampling of treatment tanks) and effluent (end of treatment) sampling (locations and parameters) that is done to assist in the process.
22. Provide the RD 202 Monitoring Reports, as required by the MWRDGC, from January 2004 until present, and continue submitting monthly reports on a quarterly basis beginning on April 15, 2005 (for the monitoring results for January through March, 2005), and on July 15 (for the monitoring results for April through June), etc. until told to cease.
23. Document the waste acceptance and subsequent waste treatment for all incoming loads accepted between April 26 and April 30, 2004. Include waste manifests, fingerprints, and classification (using both Beaver Oil lab analysis classification system and the sub-category classification per Table 5-1 of the CWT guidance). Describe the treatment process for each classification, include internal sampling data and tank residence times. Finally, provide documentation showing that the waste received equivalent treatment.
24. Describe the circumstances which necessitate transporting wastes for treatment or storage between the Beaver Oil facility in Gary, Indiana, and the Beaver Oil facility in Hodgkins, Illinois.
25. Describe/indicate circumstances when waste treatment is initiated at a Beaver Oil Facility, but is only partially treated. Describe the ensuing procedures, including off-site treatment or product sale.

26. Indicate why Beaver Oil is considering constructing a new wastewater treatment facility.
27. If Beaver Oil is planning on constructing a new wastewater treatment facility, please provide documents/engineering plans detailing the nature and scope of the new wastewater treatment facilities and include:
 - a. Expected completion/operating date;
 - b. Capital, operations and maintenance costs;
 - c. Supporting data demonstrating that the new wastewater facility will achieve equivalent treatment;
 - d. Design flow and pollutant specifications; and
 - e. Permit applications to install/construct the treatment facility.
28. Describe the current operation and maintenance procedures adopted by Beaver Oil for the treatment facility and explain the adequacy of these procedures (See page 8-13 of the CWT Guidance).
29. Provide the Facility's operation and maintenance logs, including logs documenting tank cleaning and repairs, from January 2004 until present for the treatment facility.
30. Please provide a copy of all permits issued by the Illinois EPA, permit applications and correspondence regarding storm water drainage at the Beaver Oil Facility.
31. During the inspection, U.S. EPA noted two 4" PVC storm lines. The first storm line (Pipe #1) originated at an inlet draining the area located between the two loading areas. The second storm line consisted of a main PVC pipe (Pipe #2), which drained the low point at the southeast corner of the garage, and a PVC connector pipe (Pipe 2A), which drained the trench in the garage floor. The PVC connector pipe was apparently disconnected and removed by Respondent during the course of the inspection.
 - a. When were the PVC pipes (Pipes 1, 2 and 2A) installed and how long have they been in operation? What was purpose of the PVC pipes?
 - b. Were/are the PVC pipes permitted or represented in the storm water permit/application? Are the PVC pipes represented in any other plans or documents for the Facility? If so, please provide these plans/documents.
 - c. Describe and characterize the water drained by the PVC pipes. Include a detailed map that depicts the direction of the storm water flow, include the industrial activity contact areas drained by the PVC pipes and the potential impact on the storm water's pollutant characteristics. Describe any treatment the water received prior to discharge.
 - d. Explain the existing conditions of the PVC pipes and the areas drained by the pipes. Include drawings and the answers to the following questions:

1. How is the water drained, treated, discharged from the garage floor trench? Has the connector pipe been reconnected? (Pipe 2A);
 2. How is the water drained, treated, discharged from the low point located at the southeast corner of the garage? (Pipe 2); and
 3. How is the water drained, treated, discharged from the area served by the inlet located between the two loading areas? (Pipe 1)
32. What operations currently take place in the newly annexed property north of the Facility? Does Beaver Oil intend to change the current use of this area in the next several years?
 33. Where does water, which enters the manhole located in the most easterly building of the newly annexed property, drain? What measures are taken to prevent contaminated storm water from reaching this manhole?
 34. Describe the outside truck and the inside tank washing procedures at the Beaver Oil Facility. Include, at a minimum, the name of the company which conducts the washing (if other than Beaver), the substances in the wash water, including any water that is mixed with off specification products, the type of trucks and the pollutant loads that they were transporting, the method for capturing the runoff from the washing operation, any treatment for the waste water, the location of the discharge, the average number of trucks washed in a month, and the ownership of the trucks. Also indicate on a site map of the Beaver Facility all areas where outside trucks and inside tanks are washed. Indicate any manholes/sanitary that could potentially receive run-off from truck or tank washings.

RESOURCE CONSERVATION AND RECOVERY ACT

35. For calendar years 2002 through 2004, provide copies of analysis showing that the used oil marketed by Beaver Oil for energy recovery meets the fuel specifications for on-specification used oil required by 40 C.F.R. Part 279, specifically 40 C.F.R. §§ 279.11 and 279.72. Provide any analytical results for polychlorinated biphenols (PCBs) required by 40 C.F.R. § 761.20(e) for all on-specification used oil sold by Beaver Oil during calendar years 2002 through 2004.
36. Beaver Oil's Waste Analysis Plan ("WAP," Section 7 of the October 2003 Part B Permit 1st renewal - Revision 1), at Table 7-2, identifies the following test method, test method reference and rationale for test selection, respectively, as applicable to PCBs in inbound used oil streams: (a) first screened for total chlorine (Cl), then test by GC-w/ECD; (b) U.S. EPA SW-846 Method 8082 or equivalent; and (c) greater than 49 ppm can cause waste to be a TSCA regulated waste that cannot be accepted at the Facility. Provide PCB analyses for the following streams: (i) Mid-America Steel Drum Co., Beaver Oil's assigned project number 10680639; (ii) Mid-America Steel Drum Co., project number A235BJ32; (iii) Betz Dearborn, Inc., project number B121JA; (iv) AAA Environmental Ind., project number A294A; (v) AAA Environmental Ind., project number A294C; (vi) Degussa Goldschmidt Chemical, project number D101BJB; (vii) Exact Machine Co., Inc., project number 36; and (viii) Rollex Corp. project number R101J.
37. At page 7-3 of the WAP, reference is made to several forms when explanation of the Facility's waste constituent analysis is presented. These forms include: the "waste sample evaluation sheet," the "general waste survey information," and the "generator

certification.” Provide blank copies of each of these forms. Provide the rationale for selection of the specific criteria for which Beaver Oil tests its incoming loads. What measures, if any, are in place to ensure the validity of the generator’s waste certification?

38. At page 7-4 of the WAP, Beaver Oil identifies a total organic halogen test method, 9020 or equivalent. Provide the rationale for selecting this particular test method over and against other methods identified in SW-846, such as Method 5050 in conjunction with Method 9056, 9075, 9076, 9077 or 9253.
39. Beaver Oil’s WAP further states, at page 7-14, “[i]f the total chlorine is greater than 1,000 ppm, then analysis for chlorinated solvent species will be performed — this by GC-ECD with purge and trap sampling.” The preceding statement was confirmed during an on-site interview with Lázaro López, Beaver Oil’s Laboratory Director, on April 27, 2004, during a walk-through of the lab. At that time, Mr. López informed U.S. EPA inspectors that Beaver Oil tests for total chlorine by employing X-ray fluorescence (ASTM Method 97), and runs F-scans¹ by running purge and trap with Method 8021 by GC-ECD, interphased with a flame ionization detector for aromatics. Provide the following: (a) test method employed for Beaver Oil’s F-scans (state whether it is Method 8021 or 8010); (b) rationale for selection of 29 halogens within Beaver Oil’s suite of halogenated compounds; (c) rationale for excluding 1,1,2-trichloro-1,2,2-trifluoroethane from the F-scan parameters; (d) state whether it is Beaver’s practice pursuant to its WAP to run F-scans on every load for which total halogens (or total chlorine) exceeds 1,000 ppm; and (e) provide any internal policy or rationale, so stated in the WAP or otherwise, for excluding F-scan analysis on received loads for which total halogens (or total chlorine) exceeds 1,000 ppm.
40. If sample analyses are used to make a total halogen determination, state the sampling method employed (*e.g.*, COLIWASA or other), the frequency of sampling, whether analyses are performed on-site or off-site, and the rationale for deciding sampling frequency and location. Also, state which test methods are employed by Beaver Oil for the following metals: arsenic, cadmium, chromium and lead. Provide the rationale for selection of these test methods.
41. Form 7-3 on page 7-10 of the WAP does not include total halogen determination. The text on page 7-3 implies that “chlorine” is on Form 7-3, but it is not. As it is not on the form, no boundary deviation levels are specified on Form 7-3, and total halogens are never a basis for load rejection. Provide a logic train or the rationale employed by Beaver Oil if, in fact, total halogens exceeding 1,000 ppm do not result in load rejection. If this is not the case, provide waste analyses, invoices, manifests, and any other documentation which demonstrates that Beaver Oil has rejected loads on the basis of total halogens during calendar years 2002 through 2004.
42. The total halogen text on page 7-14 of the WAP is inconsistent with Forms 7-2 and 7-3 and the parameter/constituent and analytical procedure list on page 7-4. Form 7-2, Form 7-3, and the list on page 7-4 do not identify total halogens (organic *and* inorganic) or

¹Beaver Oil Company’s F-scan analyses consists of 29 organic halogenated compounds (test method identified is 8010). Included within this list of 29 compounds are nine of the ten halogenated solvents identified as F001 or F002 listed hazardous wastes at 40 C.F.R. § 261.31. The sole exclusion from the F001/F002 list is 1,1,2-trichloro-1,2,2-trifluoroethane.

XRF or GC-ECD analytical procedures. Similarly, a GC-ECD unit is not included in the laboratory equipment list. If total halogens using XRF or chlorinated solvents using GC-ECD will be conducted off-site, this should be made clear in the plan. Provide an explanation of these apparent discrepancies.

43. If the general acceptance criteria on page 7-17 are correct, then only combustion units allowed by 40 C.F.R. § 761.20(e) are allowed to burn the waste-as-fuel produced by Beaver Oil. The Toxic Substance Control Act rules at 40 C.F.R. § 761.20(e) apply to used oil fuel with 2 to 50 ppm PCBs. If this is so, provide the basis upon which Beaver Oil provides used fuel oil, both off-specification and on-specification, to its customers USX, Inland Steel, and Orange Crush.
44. The WAP does not address the requirements of 40 C.F.R. § 279.55(b) for on-specification used oil fuel. It is not clear from the WAP whether Beaver Oil actually markets on- or off-specification used oil fuel. If Beaver does market on-spec used oil fuel, then its analysis plan should also include sampling and total analysis (not TCLP) for arsenic, cadmium, chromium, and lead plus total halogens and flash point on the blended fuel. Provide an explanation for this deficiency in the WAP, and provide a description of the sample preparation for analysis.
45. During the course of the April 26 - 30, 2004, multimedia and compliance investigation at the Beaver Oil Facility (MMI), U.S. EPA conducted a file search which consisted of random review of shipping manifests and analytical results for various Beaver Oil customers and their waste streams, respectively. U.S. EPA observed instances where it appeared that Beaver Oil did not implement its WAP, as several received waste streams which were found to have total chlorine content in excess of 1,000 ppm failed to undergo followup F-scan analyses for individual halogenated compounds. These waste streams, along with information to help Beaver Oil identify the particular stream, and respective chlorine concentrations, include the following: (a) Exact Machine; Beaver Oil Report # E36-040698 (dated 4/6/98); 4,183 ppm Cl; (b) Degussa Goldschmidt Chemical; Beaver Oil project # D101BJB; fingerprint analysis performed on 1/15/02; waste stream identified as "Varonic LI-520 off-spec"; 7,630 ppm Cl; and (c) Betz Dearborn, Inc.; used oil from single tank collection; Beaver Oil project # B121JA; fingerprint analysis performed on 5/15/98; 1,578 ppm Cl. Provide for each the following: (a) F-scan analysis, if available; (b) explanation for not performing an F-scan on all shipments where no F-scan was performed; (c) dates of first and last receipt by Beaver Oil of each of these waste streams; and (d) demonstration of how Beaver Oil rebuts the regulatory presumption that used oil containing greater than 1,000 ppm total halogens is a hazardous waste because it has been mixed with listed halogenated hazardous wastes (See 40 C.F.R. § 279.10(b)(ii)).
46. During the MMI, inspection at the site, U.S. EPA reviewed F-scan results for several waste streams which indicated significant concentrations of individual halogenated organic compounds. These waste streams, along with information to help Beaver Oil identify the particular stream, and the concentrations of individual halogenated compounds deemed significant (*i.e.*, greater than 100 ppm), include the following: (a) Mid-America Steel Drum; Beaver Oil project # A235BJ32; F-scan dated 5/22/03; results indicate tetrachloroethylene (PCE) at 280 ppm (or mg/L); (b) Mid-America Steel Drum; Beaver Oil project # A235BJ32; F-scan dated 5/23/03; results indicate PCE at 525 ppm; (c) Mid-America Steel Drum; Beaver project # A235BJ32; F-scan dated 6/5/03; results indicate PCE at 320 ppm, trichloroethylene (TCE) at 120 ppm; (d) Mid-America Steel Drum; Beaver Oil project # A235BJ32; F-scan dated 11/11/03; results indicate PCE at

274 ppm and TCE at 1094 ppm; (e) Mid-America Steel Drum; Beaver Oil project # 10680639; F-scan dated 4/7/04; results indicate PCE at 938 ppm and TCE at 367 ppm; and (f) AAA Environmental Ind.; Waste Survey # A294A; F-scan dated 11/15/03; PCE at 463 ppm. For each of these waste streams, provide all available analyses and information to rebut the presumption that these waste streams are hazardous due to mixing with listed halogenated hazardous waste.

47. For the waste stream identified in Request No. 46(e) above, Beaver Oil ran a fingerprint analysis on 10/24/03, indicating a chlorine concentration of 17,000 ppm. Subsequent analyses performed by Beaver Oil (Incoming Product Lab Class 3 Report Plant #1), reported on 11/15/03, indicated 37,290 ppm Cl. The fingerprint analysis further indicated bottom sediments and water (BS&W) content to be 80%, while the November 2003 analytical report indicated BS&W content to be 95%. For this waste stream, provide the following information: (a) reason for discrepancy (*i.e.*, greater than two-fold difference), between the 10/24/03 and 11/15/03 results, in Cl content; (b) reason for discrepancy, between the 10/24/03 and 11/15/03 results, for total BS&W; (c) true percent solids in this waste stream; and (d) explanation of presence of PCE in this waste stream.
48. For the waste streams identified in Request No. 46 (a) - (d) above, state the disposition of inbound loads received under Illinois manifests IL10680638 and IL10680639. Insofar as disposition of these incoming loads is concerned, provide the following: (a) identify which tanks they were sent to; (b) what treatment, if any, these loads received at Beaver Oil; (c) state whether they were ultimately sent out as off-spec or on-spec used oils; (d) and if the response to (c) above is "yes, provide all shipping manifests, invoices and/or bills of lading with respect to these outbound used oil loads; and (e) provide any and all analytical results for any outbound off-spec or on-spec loads identified in (c) above.
49. For each tank, pump, flange, valve or other piece of equipment serving the hazardous waste storage and treatment facility, provide identification numbers for each item, including a description of the individual item (*e.g.*, tank number, flange number, etc.).
50. During the course of the MMI, U.S. EPA Region 5 inspectors observed a surface depression along the southeast side of the garage which houses the oil filter crusher. This surface depression contained standing water with an oil sheen on its surface. Vertical PVC piping rising from the depression, flanges, surrounding surface soils and the base of the garage's cinder block wall were observed to have oil staining. This depression lacked secondary containment. The extent of staining on the cinder block and the presence of heavily caked soils are indicative of historical releases. Provide any information, including analytical results on the liquid observed in the depression, contractor requests and job orders, bills for services rendered, photographic evidence, post-excavation soil sampling results, and any reports prepared by or correspondence with contractors which would demonstrate that Beaver Oil removed the oil and underlying soils. Provide the following: (a) the source(s) of the oil resulting in this release; (b) measures undertaken since April 2004 to prevent further releases to the soil; and (c) any changes in Facility operating practice intended to rapidly recover future releases of used oil.

CERCLA § 103/EMERGENCY PLANNING AND COMMUNITY RIGHT TO KNOW ACT (EPCRA)

51. Provide a copy of your emergency plan which outlines the notification procedures for accidental releases at the Beaver Facility.

52. Provide documentation regarding the training of your employees on the procedures for notification of accidental releases at the Beaver Facility.
53. Identify all hazardous substance releases since January 1, 2000, and its Chemical Abstract Service (CAS) number. State the date and time of the release, including, for each:
- The amount of each hazardous substance that was released, including whether the release was on a surface area, the soil, into the Facility sewer system, or into the air. Describe your method or source of information in calculating the quantity released and provide the calculations;
 - The concentration of each hazardous substance. Describe your method or source of information in determining the concentration;
 - Provide copies of any and all relevant descriptions of each hazardous substance(s) released, i.e., Material Safety Data Sheet (MSDS), Manifest, Analytical Data, etc.;
 - Provide the RCRA identification number for each hazardous substance released, if one exists;
 - Was there any known environmental damage, e.g., fish kills, vegetation damage. If the answer is yes, please describe in detail; and
 - Did Beaver Oil notify the National Response Center regarding the above described releases? If the answer is yes, provide the name of the individual that provided the notification, the agency notified, and the date and time of each call.
54. For 2001, the Beaver facility reported, under EPCRA section 312, an annual release of 648,000 pounds of lead. Provide the annual reports for lead and mercury for the years 2002 and 2003. What is the source of the Facility's lead releases and has anything been done to reduce the release of lead?

SPILL PREVENTION CONTROL AND COUNTERMEASURES

55. At the SPCC exit meeting after the visit to your Facility on April 28, 2004, U.S. EPA discussed the following deficiencies about your SPCC plan with you (Mr. Ray Vintika) and your consultant (Mr. John Karrow):
- No management approval (40 C.F.R. § 112.7);
 - Does not follow the sequence of the regulation or provide a cross-reference table (§112.7);
 - There is no tank listing, indicating contents and capacities of each tank, in the Plan. Drawings do not show all oil tanks (§112.7(a)(3));
 - The Plan should indicate where the inspection procedures and records are kept (§112.7(e)) (they are in RCRA Part B, Section 10b);
 - Training record is missing (§112.7(f));

ATTACHMENT 4
DOCUMENT REQUEST

As stated in Attachment 3 of this Information Request, you are required to provide copies of all documents consulted, examined, or referred to in your response to the questions set out in Attachment 3 of this Information Request. For the purposes of clarity, we specifically request that Beaver Oil produce a copy of the following documents in response to this Request, in addition to others that are consulted, examined, or referred to in your response to the questions:

GENERAL

1. Facility map and plot plant.
2. Description of facility and operations.
3. Current organizational chart for the facility including organizational chart for the Environmental Control Department(s)/Division(s).

CLEAN AIR ACT

4. Provide copies of all annual emission reports submitted to the Illinois EPA, from 2000 up until 2004.
5. Please provide any written request by Beaver Oil to update or revise the October 2, 2002, lifetime operating permit-NSPS-Source (LTOP). If no such request was submitted, please so state.
6. For the period of January 1, 2000, to the day of receipt of this request, provide copies of all records kept to comply with the emission limits specified in paragraphs 3, 4, 5, and 6 of the LTOP for the following tanks: F-1, F-2, F-3, F-4, R-1, R-2, R-3, S-1, S-2, S-3, S-4, T-29, T-30, T-31, T-32, T-33, T-34, T-35, T-36, T-37, T-38, and T-39. Also provide documents showing compliance with condition 2(c) of the LTOP.
7. For all leak detection and repair (LDAR) testing conducted by Respondent (by either EPA Method 21 or any approved method] at any of the tanks listed in condition 3 of the LTOP, please provide the results from the period of January 1, 2000 to the day of receipt of this Information Request.
8. Provide a copy of Beaver Oil's initial report summarizing the regulatory status of each waste stream subject to 40 C.F.R. § 61.342 which are determined, by procedures specified in 40 C.F.R. § 62.355(c) to contain benzene, pursuant to 40 C.F.R. § 61.357. If no such initial report was submitted, please so state and give your reasons why no such report was submitted.
9. Provide a copy of Beaver Oil's Total Annual Benzene (TAB) reports submitted to either the Illinois EPA or U.S. EPA, pursuant to 40 C.F.R. § 61.357. If no such reports were submitted, please so state and give your reasons why no such report was submitted.

CLEAN WATER ACT

The following is the complete list of documents requested for submittal under the Clean Water Act. Some of these documents were also requested in Attachment 3, where the required content of the document is described in detail. Only one copy of the requested document needs to be submitted.

10. Current NPDES or Storm Water permit(s) and application including any permit modifications occurring as a result of the April 2004 inspection.
11. The original storm water management plan(s) and any other reports plans required by permit(s), and any amendments.
12. Current pretreatment ordinance(s)/permit(s)/administrative order(s) for wastewater discharges to the local POTW.
13. Reports required by the wastewater discharge permits including best practice plans, water quality assessments, toxicity studies, sludge management plan, slug control plans.
14. Any compliance order, schedule, or other enforcement actions issued in the last three years and related correspondence.
15. Any correspondence regarding exceedances of discharge limitations during the last three years.
16. Copies of self-monitoring report for NPDES discharges for the last three years.
17. RD-202 Monitoring Reports from January 2004 until present.
18. Wastewater violation notices from the POTW.
19. Baseline Monitoring Report for categorical Pretreatment Standards.
20. 90 day Compliance Report.
21. Initial Certification.
22. Periodic reports on continued compliance with categorical Pretreatment Standards for the last three years (40 C.F.R. § 403.12(e)) submitted to either the IEPA or MWRDGC.
23. Procedures/ manuals for the operations of wastewater treatment units.
24. Notifications of changed discharge and hazardous waste discharge to local POTW.
25. Slug discharge control plan(s).
26. Any MWRDGC Discharge Authorizations issued from January 2000 to present also include any Discharge Authorization correspondence.
27. Documents/engineering plans/permit to install detailing new wastewater treatment facilities.
28. Monthly Lab Reports documenting internal sampling of individual treatment tanks in the nonhazardous treatment area and wastewater holding tanks from January 2004 to present.

29. Operation and Maintenance Certification.
30. Operating Logs documenting tank cleaning (January 2004 to present).
31. Preventative Maintenance Records.
32. The waste stream survey forms, fingerprint analysis and waste classification from all customers that contributed to the wastewaters that were generated on April 27, through April 30, 2004, when the U.S. EPA was sampling or the MWRDGC was sampling for compliance.
33. Facility sewer diagram.

RESOURCE CONSERVATION AND RECOVERY ACT

34. Tank integrity tests for all hazardous waste storage and/or treatment tanks.
35. Copies of daily hazardous waste tank inspection logs, years 2002 through 2004, inclusive.
36. Copies of weekly hazardous waste container inspection logs, years 2002 through 2004, inclusive.
37. Two most recent biennial reports filed with the Illinois EPA.
38. Annual Subpart BB and Subpart CC inspections for tanks, pumps, valves and other equipment conducted for those tanks and components in light duty service for the past three years. Include all sampling results and reports submitted to Beaver by its independent *registered professional engineer*. The most recent three (3) years of reports at the time of the MMI were dated 9/10/01, 6/28/02 and 8/14/03. If the 2004 Subpart BB and Subpart CC tests were completed as of the date of this request for information, provide that report along with the 2002 and 2003 reports identified above.
39. Monthly Subpart BB inspection and repair logs for pumps, flanges and valves in light duty service for calendar years 2002 through 2004.

EMERGENCY PLANNING AND COMMUNITY RIGHT-TO-KNOW ACT

40. EPCRA notification of State Emergency Response Commission (SERC).
41. Designated facility emergency coordinators.
42. List of all releases into the environment for the past three years.
43. Written follow-up emergency release notifications for the past three years.
44. Material Safety Data Sheet report to SERC, Local Emergency Planning Committee (LEPC), and fire department(s).
45. EPA Form R submittals for the past three years.

46. Tier I/Tier II submittals to the SERC, the LEPC, and Fire Department for the last three years
47. A list of all chemicals on-site for the last three years and the maximum quantity in pound for each year.
48. Risk Management Prevention Plan and supporting documentation.
49. Documentation used to complete Form Rs for the last three years.

SPILL PREVENTION CONTROL AND COUNTERMEASURES

50. Current SPCC plan(s) required by 40 C.F.R. Part 112.
51. Tank inspection procedure and inspection records for the last three years.
52. Training records for oil handling personnel.
53. Certificate of substantial harm (40 C.F.R. § 112.20).
54. Tank listings of capacity and content.
55. Management approval of the SPCC plan.

UNDERGROUND STORAGE TANKS

56. List of all federally regulated underground storage tanks (USTs) ever in operation, including tanks currently in operation, temporarily closed or permanently closed.
57. State Notifications/Registration reports for any federally regulated USTs.
58. Reports of any releases, spills, or overflows from any federally regulated USTs.
59. Reports summarizing remedial activities/corrective action plans at confirmed release sites (if necessary).
60. Documentation of the operation of any corrosion protection equipment required on active or temporary abandoned federally regulated USTs.
61. Documentation for complying with any UST release detection requirements any active federally regulated USTs, with the exception of the two 8000 gallon UST inspected on May 6, 2004.
62. Results of any site assessments conducted upon closure of any federally regulated USTs.

TOXIC SUBSTANCES CONTROL ACT

63. List or description of all polychlorinated biphenyl (PCB) items and all PCB storage areas.

64. Annual document required by 40 C.F.R. § 761.180(a) for the last three years.
65. Monthly inspection records for storage areas subject to 40 C.F.R. § 761.65.
66. PCB transformer and hydraulic systems inventory and PCB analyses.
67. Inspection and maintenance records for PCB transformers and hydraulic systems for the last three years.
68. Manifests for PCB items shipped off-site.
69. Certifications of Destruction for PCB Transformer disposal.

ATTACHMENT 5
INFORMATION REQUEST CERTIFICATION

I, _____, certify that I have personally examined and am familiar with the information submitted in responding to this information request. Based on my review of relevant documents and discussions with individuals immediately responsible for providing relevant information and documents, I believe that the information provided is true, accurate and complete, to the best of my knowledge. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Certified this _____ day of _____, 2005.

[Signature]

[Signatory's Name and Title]

Exhibit 2

Exhibit 2

Reference and Reference Number	Page number	Information missing
CAA Questions 10	A-3(1-2)	Standard Industrial Code (SIC), length of time in business with generator and chemical/physical data such as density and chemical analysis for benzene, toluene, ethylbenzene, xylenes, and other organic compounds for each waste stream
12D -Carbon canisters and condensers	A-3(2)	the average size of the shipment(s) and the time elapsed, in days, between shipments
13- Air scrubbers	A-3(2)	control efficiency
14c	A-3(2)	Exact date of construction /installation and cost of tanks F-3, F-4, and T-39
14d	A-3(2)	Exact date of any physical change to these tanks. If specific change occurred, please describe
14e	A-3(2)	True vapor pressure of the fuel stored
14g	A-3(2)	Characteristic and type of waste typically stored

CAA Document Request 4	A-4(1)	Provide copies of all annual emission reports submitted to the Illinois EPA for: 2000 2001 2003 2004
6	A-4(1)	For the period of January 1, 2000, to the day of receipt of this request, provide copies of all records kept to comply with the emission limits specified in paragraphs 3, 4, 5, and 6 of the LTOP for the following tanks: F-1, F-2, F-3, F-4, R-1, R-2, R-3, S-1, S-2, S-3, S-4, T-29, T-30, T-31, T-32, T-33, T-34, T-35, T-36, T-37, T-38, and T-39. Also provide documents showing compliance with condition 2(c) of the LTOP.
7	A-4(1)	For all leak detection and repair (LDAR) testing conducted by Respondent (by either EPA Method 21 or any approved method] at any of the tanks listed in condition 3 of the LTOP, please provide the results from the period of January 1, 2000 to the day of receipt of this Information Request.

8	A-4(1)	Provide a copy of Beaver Oil's initial report summarizing the regulatory status of each waste stream subject to 40 C.F.R. § 61.342 which are determined, by procedures specified in 40 C.F.R. § 62.355(c) to contain benzene, pursuant to 40 C.F.R. § 61.357. If no such initial report was submitted, please so state and give your reasons why no such report was submitted.
9	A-4(1)	Provide a copy of Beaver Oil's Total Annual Benzene (TAB) reports submitted to either the Illinois EPA or U.S. EPA, pursuant to 40 C.F.R. § 61.537. If no such reports were submitted, please so state and give your reasons why no such report was submitted.