



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276
JAMES R. THOMPSON CENTER, 100 WEST RANDOLPH, SUITE 11-300, CHICAGO, IL 60601

ROD R. BLAGOJEVICH, GOVERNOR RENEE CIPRIANO, DIRECTOR

217/524-3300

December 16, 2003

Certified Mail
7001 2510 0002 1281 7636

Interstate Pollution Control, Inc.
4430 Boeing Drive
Rockford, Illinois 61109

Re: 2010300029 -- Winnebago County
Interstate Pollution Control
ILT180012577
State Permit Number 1988-05-OP
Permit No. 2003-169-SP
Log Number 2003-169-SP (1998-407, 1995-123, 1994-048, 1993-545, 1993-204, 1988-233, 1988-207)
State Permit File

Gentlemen:

Supplemental permit is hereby granted to Interstate Pollution Control, Incorporated (IPC Inc.) as owner and operator to develop and operate new tanks, all in accordance with the application and plans prepared by Gerald L. VanDerheyden, Operations Manager, IPC, Inc. dated April 30, 2003 and received on May 15, 2003. This permit allows IPC, Inc. to operate a solid waste management facility to process used oil, aqueous wastewaters and LUST water at 4430 Boeing Drive, Rockford, Illinois. The site consists of 1.3 acres, more or less, in the Southwest Quarter of the Northwest Quarter of Section 11, Township 43 North, Range 1 East of the Third Principal Meridian in Winnebago County, Illinois. Final plans, specifications, application and supporting documents as submitted and approved shall constitute part of this permit and are identified in the records of the Illinois Environmental Protection Agency, Bureau of Land by the permit number(s) and log number(s) designated in the heading above.

The application approved by 2003-169-SP consists of the following document(s):

Table with 3 columns: DOCUMENT, DATED, DATE RECEIVED. Rows include Original Application (Log No 2003-169), Waiver, and Additional Information.

ROCKFORD -- 4302 North Main Street, Rockford, IL 61103 -- (815) 987-7760 • DES PLAINES -- 9511 W. Harrison St., Des Plaines, IL 60016 -- (847) 294-4000
ELGIN -- 595 South State, Elgin, IL 60123 -- (847) 608-3131 • PEORIA -- 5415 N. University St., Peoria, IL 61614 -- (309) 693-5463
BUREAU OF LAND - PEORIA -- 7620 N. University St., Peoria, IL 61614 -- (309) 693-5462 • CHAMPAIGN -- 2125 South First Street, Champaign, IL 61820 -- (217) 278-5800
SPRINGFIELD -- 4500 S. Sixth Street Rd., Springfield, IL 62706 -- (217) 786-6892 • COLLINSVILLE -- 2009 Mall Street, Collinsville, IL 62234 -- (618) 346-5120
MARION -- 2309 W. Main St., Suite 116, Marion, IL 62959 -- (618) 993-7200

Additional Information	September 17, 2003	September 22, 2003
Waiver	September 24, 2003	September 26, 2003
Waiver	September 25, 2003	September 29, 2003
Additional Information	October 6, 2003	October 8, 2003
Waiver	October 27, 2003	October 30, 2003
Additional Information	November 10, 2003	November 14, 2003

Specifically, Supplemental Permit No. 2003-169-SP approves the modification of the plant to develop and operate new tanks. BCS1, BCS2, TA24, TA25, TA27, TA28, TA31, TA45, TA50 and TA51.

Except for the differences described in the table below, the special conditions of the Supplemental Permit No. 2003-169-SP Log No. 2003-169 are identical to Supplemental Permit No. 1998-407-SP Log No. 1998-407 issued March 18, 1999.

<u>Condition Number in Log No. 1998-407</u>	<u>Condition Number in Log No. 2003-169</u>	<u>Description of change</u>
1.A	1.A	Revised
1.B	1.B	Revised
3	3.	Revised
3.d.	3.d.	Revised
3.e.	3.e.	Revised
33.	33.	Revised

This permit is issued subject to the standard conditions attached hereto and incorporated herein by reference, and further subject to the following special conditions:

1. This permit allows Interstate Pollution Control to operate the following units:

A. Tanks

<u>Tank Designation</u>	<u>Volume (Gallons)</u>	<u>Function</u>
BCS-1	2500	Bulk Ferric Chloride
BCS-2	1000	Bulk Sulphuric Acid
TA-8	4500	Alum reactor
TA-9	2500	Flocculation reactor
TA-10	3000	Lamella tube gravity clarifier
TA-11	3500	Sludge thickener
TA-12	3500	Sludge thickener
TA-13	3500	Sludge thickener
TA-15	5000	Oil processing
TA-16a	3500	Oil Storage
TA-16b	3500	Oil Storage
TA-16c	3500	Oil Storage
TA-17	5000	Oil processing
TA-19	5000	Oil holding
TA-24	5000	Bulk Alum
TA-25	5000	Bulk Caustic
TA-26	3500	Sludge thickener
TA-27	5000	Oil processing
TA-28	100	Anionic Polymer
TA-29	1000	Filtrate Collection/Lift Tank
TA-30	100	Central floor spill sump
TA-31	100	Limestone Slurry
TA-42	17,000	Organic Treatment Equalization
TA-45	10,000	Incoming waste storage
TA-46	7000	Secondary batch clarifier
TA-47	7000	Secondary batch clarifier
TA-50	11,500	Primary Oil Stream Receiving
TA-51	17,000	Secondary Oil Stream Receiving

B. Processing Units

All other corresponding sumps, pumps, piping, controls, chemical storage and feed systems, loading and unloading areas, and appurtenances.

2. In case of conflict between the approved permit application and these special conditions, the special conditions of this permit shall govern the development and operation of the subject facility.
3. Prior to placing the BCS1, BCS2, TA24, TA25, TA27, TA28, TA31, TA45, TA50 and TA51 units into service the permittee shall:
 - a. Obtain certification by the manufacturer, for commercially available tanks, or certification by an Illinois Registered Professional Engineer, for custom fabricated tanks, that the unit and ancillary equipment were fabricated or manufactured in such a manner that the unit's integrity would not be compromised during normal service from physical damage and excessive stress due to settlement, vibration, expansion or construction.
 - b. Provide to the Illinois EPA a field inspection report certified by a Qualified Inspector/Qualified Installer that the tank system was constructed and installed in accordance with the plans and specifications. This report must address the following items:
 1. weld breaks,
 2. punctures,
 3. scrapes of protective coating,
 4. cracks,
 5. corrosion,
 6. other structural damage or inadequate construction/installation,
 7. the results of a hydrostatic leak test, consisting of filling the tank with water and observing for 24 hours, and
 8. certification of the secondary containment volume.
 - c. Obtain certification by the manufacturer, for commercially designed and built tanks, or by a Illinois Registered Professional Engineer, for custom designed to industry standards. The certification shall include a listing of the standards or criteria selected as the basis for the design, such as U.L., API, ASTM, AWWA or AWA standards. The permittee shall provide a justification as to why the design standard or criteria was selected. If no specific design standard is used in the design process, the permittee shall provide all calculations, measurements and specifications used in the design of the tank to insure the tank is designed to withstand the stresses imposed by normal service, settlement, vibration, expansion and contraction.
 - d. Contact the Illinois EPA's Bureau of Land, Field Operations Section, Rockford Regional Office at 815/987-7760 at least ten working (10) days prior to placing Units BCS1, BCS2, TA24, TA25, TA27, TA28, TA31, TA45, TA50 and TA51 into service.

- e. Correct any deficiencies prior to placing Units BCS1, BCS2, TA24, TA25, TA27, TA28, TA31, TA45, TA50 and TA51 into service.
4. Technical data, such as design drawings, specifications and engineering studies, must be certified (sealed) by a professional engineer who is licensed to practice in the State of Illinois in accordance with Ill. Rev. Stat., Par. 5101, Sec. 1 and Par. 5119, Sec.13.1.
5. Special waste generated at the facility which must be sent off-site for treatment, storage, disposal shall be (1) transported to a facility permitted to receive such waste by a licensed special waste hauler and (2) accompanied by a properly completed Illinois EPA manifest.
6. The area where tank trucks are loaded and unloaded shall be inspected after each use. Any release of material observed during this inspection shall be responded to immediately. Such response shall include containing and collecting the released material and removing all contaminated media.
7. Any spills/leaks/releases of waste observed during the operation of the facility in the processing area but outside the spill containment trench shall be responded to immediately. Such response shall be in accordance with the procedures described in condition 6 above. At a minimum, the entire processing area must be inspected at the end of each operating day for spills/leaks/releases of waste.
8. Oils, oily wastewaters or other wastes contaminated with PCBs greater than two (2) PPM, or any dioxins shall not be received at this site.
9. The permittee shall analyze each batch of blended used oil fuel which is claimed to meet the used oil specification identified in 35 Ill. Adm. Code 739.111 prior to shipping it off-site. The permittee shall maintain copies of this analysis at the facility as part of the operating record for at least three years.
10. This facility is not permitted to receive storm water from areas which are used to accumulate, store, or process hazardous waste.
11. All alarms, emergency shut down interlocks, and waste feed cut-offs shall be tested weekly. Results of this testing shall be documented and maintained as part of the facilities operating record, available for review by Illinois EPA personnel.
12. The site shall only receive wastes in tank trucks.

13. Liquids and other materials which accumulate in the secondary containment areas, including the spill containment trench, shall be removed from the areas weekly to allow for proper inspection. Results of this inspection must be documented in the operating record.
14. Any crack detected in the containment system of the building where the process takes place shall be sealed with a material which is long-wearing, resilient, and resistant to oil within 30 days of detection of the crack.
15. Wastes received at this facility shall be limited to the following nonhazardous wastes:
 - a. Used oil. Wastes containing 50% or more oil that can produce recoverable quantities of used oil equal to or greater than 1% shall be referred to as "used oil." Wastes containing less than 50% oil must be subjected to a treatability test where the waste is treated with an oil emulsion-breaking polymer to determine the amount of recoverable used oil as described in the Waste Analysis Plan. If the waste containing less than 50% oil can produce recoverable quantities of used oil equal to or greater than 1%, the waste may be managed as "used oil."
 - b. Aqueous wastewater. Wastes containing water or water plus 1% or more oil that cannot produce recoverable quantities of used oil equal to or greater than 1% shall be referred to as "special waste/aqueous wastewater."
 - c. LUST water. Petroleum contaminated liquids from leaking underground storage tank (LUST) remedial actions.
16. The permittee is authorized to accept the wastes identified in condition 15 provided the generator complies with the following requirements:
 1. The waste is analyzed in accordance with the requirements of condition 17 and complies with the acceptance criteria in the approved waste analysis plan;
 2. The waste is delivered by a Illinois licensed special waste hauler or an exempt hauler as defined in 35 Ill. Adm. Code 809.211; and
 3. The waste is accompanied by a manifest, if required.

The Illinois EPA has modified its procedures. As a result, an authorization number is no longer required. Therefore, the generator will no longer be required to identify the authorization number on the manifest when shipping waste as authorized by this permit.

17. The permittee shall obtain a completed Special Waste Preacceptance form and a preacceptance analysis from each generator. In addition, the annual generator certification

form, which certifies the waste has not changed since the last analysis, must be completed and included in the operating record within 12 months after completion of the last preacceptance or random analysis. A complete lab analysis must be provided with the exceptions listed below. Analysis shall be conducted using SW-846 test methods. The waste shall be reanalyzed at least every five years and must identify the actual concentration of each chemical constituent and state of each physical parameter. In all cases a copy of the lab analysis (on lab letterhead and signed by a responsible party such as the person conducting the analysis or his supervisor) must be included in the operating record with the preacceptance form and annual certifications as identified in attachments A and B, and may not be greater than one year old at the time. The analysis is required if the composition of the waste changes (normal variations in waste composition are expected and are not included in this requirement). All waste must be analyzed as follows:

- a. Except as allowed by conditions 17(e), 17(h), and 18, the permittee shall conduct the following lab analysis to determine the concentrations of the following parameters:

Flash point	Ammonia
Sulfide (reactive)	Cyanide
Cyanide (reactive)	Bottom sediment and Water
pH	PCBs
Toxicity Characteristic Constituents	

- b. The permittee shall conduct analysis for reactive sulfides and reactive cyanides on all wastes except used oil. Used oil need only be analyzed for reactive sulfides. For wastes containing greater than 10 ppm reactive cyanide or reactive sulfide the generator will be required to provide a signed and dated statement indicating that none of the following have occurred:
 - 1. The waste has never caused injury to a worker because of H₂S and/or HCN generation;
 - 2. That the OSHA work place air concentration limits for H₂S and/or HCN have not been exceeded in areas where the waste is generated, stored or otherwise handled;
 - 3. That air concentrations of H₂S and/or HCN, above 10 ppm, have not been encountered in areas where the waste is generated, stored or otherwise handled;
 - 4. For waste containing 250 ppm or greater reactive cyanide or 500 ppm or greater reactive sulfide, it is presumed hazardous pursuant to 35 Ill. Adm. Code 721.123(a)(5) unless specific information to show it does not present a danger to human health or the environment can be provided.

5. The used oil or aqueous wastewater shall not be accepted and must be rejected and returned to the generator if the requirements of Condition 17(b). 1-4 are not met.
- c. The Permittee shall conduct analysis for phenols on all wastes except used oil. If the total phenol concentration is greater than 500 ppm, the waste must be rejected.
- d. The Permittee shall conduct analysis for cyanide and Bottom Sediment and Water only on used oil. ASTM Method D-4007 shall be utilized to determine the amount of bottom sediments and water in samples analyzed during the preacceptance and fingerprinting waste analyses.
- e. Metal and organic analysis required by the waste analysis plan or the regulation may be conducted by utilizing either procedure (i.e. total or TCLP), but any constituent, whose total concentration exceeds the TCLP limit specified in 35 Ill. Adm. Code 721.124 must be analyzed using the TCLP test and the results reported, unless an alternative test has been approved by the Illinois EPA. TCLP test methods must be in accordance with SW 846-1311.
- f. Each sample of waste or used oil accepted for treatment at this facility shall be analyzed for total halogens (TOX) using the test methods specified in SW-846, Third Edition. Materials containing greater than 1000 ppm must be rejected as hazardous waste unless additional analysis is completed. Additional analysis must include methods SW-846-8010 or 8240. If the additional analysis indicates none of the F001 or F002 constituents are present at a concentration greater than 100 ppm, the waste may be managed as non-hazardous special waste.
- g. Wastewaters, as defined in condition 15, are subject to the hazardous waste determination identified in 35 Ill. Adm. Code 722.111 (complete TCLP analysis) and not the analysis requirements of 35 Ill. Adm. Code 739.
- h. EXCEPTIONS:
 1. The generator may certify that the eight pesticides (D012, D013, D014, D015, D016, D017, D020 and D031) would not reasonably be expected to be present in their waste and that based on the nature of the generator's business the certification statement is reasonable.
 2. Petroleum contaminated liquids from LUST sites are temporarily exempt from full TCLP analysis and the generator may limit analyses to flashpoint and TCLP lead.

3. Recovered used oil which is shipped off-site as on-specification used oil fuel need only be analyzed for flashpoint, total organic halogen or total chlorine, and totals for arsenic, cadmium, chromium, lead and PCBs.
18. Finger Print Waste Analysis (conducted upon the receipt of each load of waste at the facility).
- a. For each sample of waste oil collected from an incoming load for fingerprinting analysis, the Permittee shall determine the total organic halogens (TOX) or total chlorine concentration. This determination may be made by utilizing the Chlor-D-Tect test method (or equivalent) or by applying knowledge of the halogen or chlorine content of the used oil in light of the materials or processes used.
 - b. Wastes which do not contain TOX or total chlorine at a concentration greater than 1000 ppm and have undergone the facility's preacceptance testing may be accepted at the facility.
 - c. Wastes containing TOX or total chlorine concentration greater than 1000 ppm in which the presumption that it has been mixed with a listed hazardous waste can be successfully rebutted and the wastes have undergone the facility's preacceptance testing may be accepted at the facility.
 - d. The rebuttable presumption for wastes containing TOX or total chlorine at a concentration greater than 1000 ppm, must be demonstrated in accordance with Condition 17(f). The waste shall not be accepted and must be rejected and returned to the generator if the requirements of Condition 17(f) are not met.
19. Only non-hazardous special wastes as defined in 35 Ill. Adm. Code 722.111 may be received at this facility. No hazardous wastes as listed in 35 Ill. Adm. Code 721 Subpart D may be accepted at this facility.
20. The permittee shall maintain the concrete slab, the curbs, and walls that are used as secondary containment, with an impermeable surface coating or lining that:
- a. Is compatible with the wastes, or any other liquid, stored in the containment system, and
 - b. Will prevent migration of the waste into the concrete of the slab, wall or curb.
 - c. Interstate Pollution Control shall perform a complete inspection of the surface coating or lining yearly and perform annual maintenance to insure the integrity of the coating.

Results of this testing shall be documented and maintained as part of the facilities operating record, available for review by Illinois EPA personnel.

- d. It shall not be an act of non-compliance if the coating or lining has been installed properly but does not live up to the manufactures printed performance standards and/or if the coating, or lining fails due to excessive wear or chemical breakdown. The Permittee shall notify the agency within thirty days of becoming aware of the failure. The facility shall request modification of it's permit to install a new coating or delete the coating requirement within 180 days.
21. The following information shall be documented as part of the facility's operating record for each load of special waste:
 - a. Special tracking number assigned to each load.
 - b. Date the load was received.
 - c. Manifest number associated with the load.
 - d. Volume of waste received.
 - e. Generator name, location, and Illinois EPA generator number.
 - f. Waste name.
 - g. Results of all analysis conducted on load of waste.
 - h. Documentation as to whether the load of waste was accepted or rejected.
 - i. Results of the oil emulsion-breaking polymer treatability test for each less than 50% oil waste stream accepted as used oil in accordance with Condition 15(a).
 22. Interstate Pollution Control must keep a record of each shipment of used oil that is delivered directly to a used oil burner. These records may take the form of a log, invoice, manifest, bill of lading or other shipping documents. Records of each delivery must include the following information:
 - a. The name and address of the transporter who delivers the used oil to the burner;
 - b. The name and address of the burner who will receive the used oil;
 - c. The Illinois special waste identification number of the transporter;

- d. The Illinois special waste identification number of the burner who will receive the used oil;
 - e. Quantity of used oil shipped; and
 - f. The date of shipment.
23. The following information shall be documented in the facility's operating record for all on-site generated special waste (e.g., oil sludges, screened solids, filter cake, etc.) shipped off-site.
- a. Date that each load is shipped off-site;
 - b. Waste name;
 - c. Name, location and Illinois EPA identification number of the off-site receiving facility;
 - d. Number of the manifest under which the waste is to be shipped; and
 - e. The volume of waste shipped off-site.
24. All unloading and loading of special wastes shall be accomplished over non-earthen spill containment structures or devices.
25. In the event of a spill, such materials and equipment as is necessary must be available on-site in order to prevent waste from flowing or leaching off-site.
26. Special wastes shall be transported to this facility utilizing the Illinois EPA's Manifest System.
27. The Illinois EPA shall be notified at the initiation of the closure plan, submitted pursuant to 35 Ill. Adm. Code 807.205(1), which shall be implemented within 30 days after this unit ceases operations. Except modified below, the closure plan contained in the approved permit application is hereby approved and incorporated herein by reference.
- a. All equipment associated with the process and the entire process area shall be decontaminated. Such decontamination shall consist of steam cleaning (high pressure wash) followed by a triple rinse.

- b. The entire process area, including secondary containment structures, shall be inspected for cracks prior to and after decontamination of the area.
 - c. The results of the inspection required by condition 27.b above shall be submitted to the Illinois EPA along with a proposed plan for soil sampling and analysis between cracks in the containment system and any other areas where containment is thought to be present. Soil sampling and analysis in these areas shall not commence until such time as the Illinois EPA has approved the proposed plan.
 - d. Clean-up objectives for closure of the facility will not be established by the Illinois EPA until such time as the soil sampling and analysis required by Condition 27(c) has been completed and the Illinois EPA has reviewed the results.
 - e. The permittee shall notify the Illinois EPA in writing within thirty days after receiving the final load of waste.
 - f. The permittee shall initiate implementation of the closure plan within 30 days after the site receives its final volume of waste.
 - g. The permittee shall not file any application to modify the approved closure plan less than 180 days prior to the receipt of the final volume of waste.
28. This permit is subject to review and modification by the Illinois EPA as deemed necessary to fulfill the intent and purpose of the Environmental Protection Act, and all applicable environmental rules and regulations.
29. Waste that does not comply with the acceptance criteria in the approved waste analysis plan or is determined to be unacceptable by conditions in this permit must be rejected and returned to the generator. This rejected waste must be sent back to the generator no later than 24 hours after it is determined to be unacceptable. Storage of unacceptable waste past 24 hours will be determined to have been accepted and therefore a violation of this permit.
30. Any modification to the facility shall be the subject of an application for supplemental permit for site modification submitted to the Illinois EPA. A modification is defined as the addition or modification of any waste treatment unit, changes in operational procedures or waste storage unit, or any extension or modification of the building and spill containment system, except additions or changes in piping, pumps, or small batch/storage tanks <1000 gallons which have been approved as part of the Bureau of Water Permit or changes in the hours of operation at the facility. Changes to the facility which do not meet the definition of a modification must be documented and maintained as part of the facility's operating record.

The permittee shall submit to the Illinois EPA's Bureau of Land, Field Operations Section, Rockford Regional Office a quarterly report detailing any additions or changes which do not meet the definition of a modification and an updated facility schematic showing such changes.

31. Permittee shall notify the Illinois EPA of any changes from the information submitted to the Illinois EPA in its application for a developmental and operating permit for this site. Permittee shall notify the Illinois EPA of any changes in the names or addresses of both beneficial and legal titleholders to the here-in permitted site. Such notification shall be made in writing within fifteen (15) days of such change and shall include the name or names of any parties in interest and the address of their place of abode; or, if a corporation, the name and address of its registered agent.
32. For the purpose of this permit, the operating record shall be defined as a collection of required information organized in binders, folders, logs, etc. The operating record is not required to be a single record or stored in a central location. However, the information required to be documented in the operating record by this permit must be stored for the appropriate length time and available on request by Illinois EPA personnel.
33. Three copies of all certifications with original signatures, logs or reports which are required to be submitted to the Illinois EPA by the permittee shall be mailed to the following address:

Illinois Environmental Protection Agency
Bureau of Land
Division of Land Pollution Control
Permit Section - #33
1021 North Grand Avenue East
Post Office Box 19276
Springfield, Illinois 62794-9276


Work required by this permit, your application or the regulations may also be subject to other laws governing professional services, such as the Illinois Professional Land Surveyor Act of 1989, the Professional Engineering Practice Act of 1989, the Professional Geologist Licensing Act, and the Structural Engineering Licensing Act of 1989. This permit does not relieve anyone from compliance with these laws and the regulations adopted pursuant to these laws. All work that falls within the scope and definitions of these laws must be performed in compliance with them. The Illinois EPA may refer any discovered violation of these laws to the appropriate regulating authority.

Within 35 days after the notification of the final permit decision the applicant may petition for a hearing before the Illinois Pollution Control Board to contest the decision of the Illinois EPA, however, the 35-day period for petitioning for a hearing may be extended for a period of time not to exceed 90 days by written notice provided to the Board from the applicant and the Illinois EPA within the 35-day initial appeal period.

Sincerely,



Joyce L. Munie, P.E.
Manager, Permit Section
Bureau of Land


JLM:KSG:bjh963611s.doc

cc: Roger A. Logeson, P.E.