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Clerk of the Board *c/o Jon Therriault*
 Illinois Pollution Control Bd., Case No. AS 08-10
 100 W. Randolph St., Suite 11-500
 Chicago, IL 60601

STATE OF ILLINOIS
 Pollution Control Board
 Tom Edwards
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PC#327

(Addendum to testimony: The IPCB is being asked by Peoria Disposal Co. to approve a new "secret" and little explored method of treating and disposing of very hazardous, highly toxic waste, specifically, EO61 electric arc furnace (EAF) dust. PDC wants, it says, to keep open its toxic waste landfill in Peoria to process such waste for eventual re-shipment to landfills for only non-hazardous waste.)

-- Even if this new "secret" process eventually would prove to temporarily immobilize some of the myriad of contaminants of such waste, how long they would possibly remain immobile is still an apparent unknown.

-- Samples were collected in December, 2007, and February, 2008, by the firm RMT hired by PDC. PDC also had to later send samples for the IEPA to check. The samples were reported by RMT to be "pre-selected" at PDC from loads trucked across country from several of its 10 steel mill customers (in six states). After arrival at PDC they were reported to have been "processed" in small (3.5-ton) batches in a "mixer" containing the secret "treatment" additions. After being "thoroughly blended," the mixture was transferred to "rolloff boxes" where it would be "stored on-site for a period of time." There it could be tested to see if the toxics then met allowable contaminant standards. If so the EAF waste could be allowed to be re-trucked to a non-hazardous landfill.

... in effect, PDC controlled what went in for sampling -
 -- No reason is given why PDC's proposed new but secret treatment process could not be done at the steel mills themselves -- or right at the many landfills for non-toxic waste to avoid the manifold road hazards and cost of extensive truck transfers.

However, this proposed new process addresses only non-volatile heavy metals. The multitude of "volatile" chemicals in EAF dust would continue to dissipate into our air.

Moreover, the IEPA only stated that PDC's "electric arc furnace dust will likely meet the required" low level of toxic waste. Likely also means maybe. (Part II, Sect. 104.406, IEPA filing, 6/12/08).

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