

**BEFORE THE ILLINOIS POLLUTION CONTROL BOARD**

WASTE MANAGEMENT OF ILLINOIS,	)	
INC.,	)	
	)	
Petitioner,	)	
	)	
v.	)	PCB _____
	)	
ILLINOIS ENVIRONMENTAL	)	
PROTECTION AGENCY,	)	
	)	
Respondent.	)	

**PETITION FOR REVIEW OF PERMIT APPLICATION DENIAL**

Waste Management of Illinois, Inc. (“WM”), by its attorneys, Taft, Stettinius & Hollister LLP, pursuant to Section 40(a)(1) of the Illinois Environmental Protection Act, 415 ILCS 5/40(a)(1), petitions the Pollution Control Board for review and reversal of the Illinois Environmental Protection Agency’s (“Illinois EPA” or “Agency”) denial of WM’s application for a permit to accept leachate from Peoria City-County Landfill No. 2 (“PCC #2”) at its Prairie Hill RDF leachate evaporator. In support of its petition, WM states as follows:

**I. Background**

1. WM is the permitted operator of the Prairie Hill RDF, a municipal solid waste landfill located in Whiteside County, Illinois.
2. Whiteside County granted local siting approval for Prairie Hill in 1992.
3. In February 2023, the Illinois EPA Bureau of Land issued a permit modification approving the request for WM to construct a leachate evaporator at the site with a 40,000 gpd capacity to treat site-generated landfill leachate.
4. Prairie Hill currently generates approximately 20,000 gallons of leachate per day that is managed by the evaporator.

5. WM is also the permitted operator of PCC #2, a municipal solid waste landfill located in Peoria County, Illinois.

6. On January 12, 2024, WM submitted an application to the Illinois EPA requesting a permit to allow it to accept leachate from PCC #2 at the Prairie Hill evaporator. (Exhibit A).

7. The permit application did not request an increase in the permitted capacity of the evaporator or any other changes to the operation of the evaporator.

8. The Illinois EPA denied the permit application by letter dated June 18, 2024. (Exhibit B).

9. As sole reason for denying the application, the letter said:

The Illinois Environmental Protection Act (Act), Section 3.330(b)(3) states that a new pollution control facility is “a permitted pollution control facility requesting approval to store, dispose of, transfer or incinerate, for the first time, any special or hazardous waste.” Prairie Hill Landfill is proposing using a treatment facility (leachate evaporator) that would be accepting leachate, which is a special waste, from other facilities for the first time. Therefore, proof of local siting approval for a new treatment facility, granted by the County of Whiteside, shall need to be submitted to the Illinois EPA before the leachate evaporator can be approved.

## **II. The Agency Improperly Denied WM’s Permit Application**

A. *The Leachate Evaporator is Not a “Pollution Control Facility.”*

10. The leachate evaporator falls within the statutory exemption to the definition of “pollution control facility” set out in Section 3.330(a)(3) of the Act:

The following are not pollution control facilities:

\* \* \*

(3) sites or facilities used by any person conducting a waste storage, waste treatment, waste disposal, waste transfer or waste incineration operation, or a combination thereof, for wastes generated by such person’s own activities, when such wastes are stored, treated, disposed of, transferred or incinerated within the site or facility owned, controlled or operated by such person, *or*

*when such wastes are transported within or between sites or facilities owned, controlled or operated by such person*[.] (emphasis added).

11. WM is a “person” under the Act. *See* 415 ILCS 5/3.315.
  12. Leachate from both Prairie Hill and PCC #2 is waste generated by WM’s own activities.
  13. The exemption in Section 3.330(a)(3) applies to WM’s request to transport waste between two sites it operates and controls for the purpose of treatment.
  14. The application does not seek to alter WM’s current practice of treating leachate generated at Prairie Hill with the evaporator.
  15. Treating third-party generated waste in addition to operator-generated waste does not negate the Section 3.330(a)(3) exemption. *See Northern Trust Co. v. County. of Lake*, 353 Ill. App. 3d 268, 281 (2nd Dist. 2004) (rejecting “the proposition that a facility is excluded as a new pollution control facility only if the owner, controller, or operator is also its sole user...[b]ecause it conflicts with the plain language of the statute[.]”)
- B. The Illinois EPA May Not Require Proof of Local Siting Approval as a Condition for a Permit to Treat an Additional Source of Waste.*
16. Section 39(c) provides that:

no permit *for the development or construction* of a *new pollution control facility* may be granted by the Agency unless the applicant submits proof to the Agency that the location of the facility has been approved by the county board of the county if in an unincorporated area, or the governing body of the municipality when in an incorporated area, in which the facility is to be located in accordance with Section 39.2 of this Act. (415 ILCS 5/39(c)) (emphasis added).
  17. WM is not seeking a permit that falls within this provision.
  18. WM is not seeking a permit for “development or construction.”

19. The Illinois EPA already fully permitted the development and construction of the leachate evaporator, which began operating in 2023.

20. Nor is WM seeking a permit to make any physical alterations to the evaporator.

21. Even if the leachate evaporator were a pollution control facility (which as explained above, it is not), it is not a new pollution control facility.

22. A new pollution control facility is only:

- (1) a pollution control facility initially permitted for development or construction after July 1, 1981; or
- (2) the area of expansion beyond the boundary of a currently permitted pollution control facility; or
- (3) a permitted pollution control facility requesting approval to store, dispose of, transfer or incinerate, *for the first time*, any special or hazardous waste. (415 ILCS 5/3.330(b) (emphasis added)).

23. The evaporator is already permitted to store and treat leachate.

24. WM is only seeking to treat leachate—the same special waste the evaporator is already permitted treat—from a different source.

25. The Illinois EPA’s contention that the evaporator is a “new” pollution control facility because it “would be accepting leachate, which is a special waste, from other facilities for the first time” is contrary to the language of the Act.

26. Under the Agency’s interpretation, whenever any permitted pollution control facility proposed to accept a special or hazardous waste from a new customer, it would become a “new pollution control facility” and be required to repeat the local siting process.

27. This result would be contrary to both longstanding Agency practice and judicial constructions of this provision. *See, e.g., Sierra Club v. Illinois Pollution Control Bd.*, 403 Ill. App. 3d 1012, 1022 (3d Dist. 2010) (vacated on other grounds in 2011 IL 110882) (finding that a

hazardous waste treatment facility seeking to accept a new type of hazardous waste for the first time was not a “new pollution control facility” and thus new siting approval was not required).

WHEREFORE, for the reasons stated above, Petitioner Waste Management of Illinois, Inc. respectfully petitions the Pollution Control Board for entry of an order:

- A. Setting a hearing on this petition for review of the Illinois EPA’s decision to deny WM’s application to accept leachate from PCC #2 for treatment at the leachate evaporator at Prairie Hill RDF;
- B. Reversing the Illinois EPA’s denial and ordering the Illinois EPA to issue a permit authorizing WM to accept leachate from PCC #2 for treatment at the leachate evaporator at Prairie Hill RDF; and
- C. Providing such other and further relief as the Board deems appropriate.

Dated: July 23, 2024

Respectfully submitted,

/s/ Philip L. Comella

Philip L. Comella

Philip L. Comella (ARDC No. 6185243)  
Ryan G. Rudich (ARDC No. 6310060)  
TAFT STETTINIUS & HOLLISTER LLP  
111 East Wacker Drive, Suite 2600  
Chicago, IL 60601  
(312) 527-4000  
[pcomella@taftlaw.com](mailto:pcomella@taftlaw.com)  
[rrudich@taftlaw.com](mailto:rrudich@taftlaw.com)

COUNSEL FOR WASTE MANAGEMENT  
OF ILLINOIS, INC.

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ILLINOIS ENVIRONMENTAL	)	
PROTECTION AGENCY,	)	
	)	
Respondent.	)	

**APPEARANCE OF PHILIP L. COMELLA AND CONSENT TO E-MAIL SERVICE**

I hereby file my appearance in this proceeding on behalf of Waste Management of Illinois, Inc. and authorize the service of documents on me by email in lieu of receiving paper documents in this matter. My email address is [pcomella@taftlaw.com](mailto:pcomella@taftlaw.com).

/s/ Philip L. Comella  
Philip L. Comella

Philip L. Comella (ARDC No. 6185243)  
Ryan G. Rudich (ARDC No. 6310060)  
TAFT STETTINIUS & HOLLISTER LLP  
111 East Wacker Drive, Suite 2600  
Chicago, IL 60601  
(312) 527-4000  
[pcomella@taftlaw.com](mailto:pcomella@taftlaw.com)  
[rrudich@taftlaw.com](mailto:rrudich@taftlaw.com)

COUNSEL FOR WASTE MANAGEMENT  
OF ILLINOIS, INC.

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	)	
Respondent.	)	

**APPEARANCE OF RYAN G. RUDICH AND CONSENT TO E-MAIL SERVICE**

I hereby file my appearance in this proceeding on behalf of Waste Management of Illinois, Inc. and authorize the service of documents on me by email in lieu of receiving paper documents in this matter. My email address is [rrudich@taftlaw.com](mailto:rrudich@taftlaw.com).

/s/ Ryan G. Rudich  
Ryan G. Rudich

Philip L. Comella (ARDC No. 6185243)  
Ryan G. Rudich (ARDC No. 6310060)  
TAFT STETTINIUS & HOLLISTER LLP  
111 East Wacker Drive, Suite 2600  
Chicago, IL 60601  
(312) 527-4000  
[pcomella@taftlaw.com](mailto:pcomella@taftlaw.com)  
[rrudich@taftlaw.com](mailto:rrudich@taftlaw.com)

COUNSEL FOR WASTE MANAGEMENT  
OF ILLINOIS, INC.

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**NOTICE OF FILING**

To:	Pollution Control Board, Attn: Clerk	Division of Legal Counsel
	Illinois Pollution Control Board	Illinois Environmental Protection Agency
	60 E. Van Buren St., Ste. 630	1021 North Grand Avenue East
	Chicago, Illinois 60605	P.O. Box 19276
	<a href="mailto:PCB.Clerks@illinois.gov">PCB.Clerks@illinois.gov</a>	Springfield IL 62794-9276
		<a href="mailto:epa.dlc@illinois.gov">epa.dlc@illinois.gov</a>

PLEASE TAKE NOTICE that I have today, July 23, 2024, filed with the Office of the Clerk of the Pollution Control Board the foregoing Petition for Review of Permit Application Denial, Appearance of Philip L. Comella, and Appearance of Ryan G. Rudich, copies of which are herewith served upon you.

/s/ Ryan G. Rudich  
Ryan G. Rudich

Philip L. Comella (ARDC No. 6185243)  
Ryan G. Rudich (ARDC No. 6310060)  
TAFT STETTINIUS & HOLLISTER LLP  
111 East Wacker Drive, Suite 2600  
Chicago, IL 60601  
(312) 527-4000  
[pcomella@taftlaw.com](mailto:pcomella@taftlaw.com)  
[rrudich@taftlaw.com](mailto:rrudich@taftlaw.com)

COUNSEL FOR WASTE MANAGEMENT  
OF ILLINOIS, INC.



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	)	
Respondent.	)	

**CERTIFICATE OF SERVICE**

I, the undersigned, certify that I have served on the date of July 23, 2024 the attached Petition for Review of Permit Application Denial, Appearance of Philip L. Comella, Appearance of Ryan G. Rudich, and Notice of Filing of same, upon the following persons by email and third-party overnight carrier before 4:30 p.m. The documents consist collectively of 40 pages.

Pollution Control Board, Attn: Clerk  
60 E. Van Buren St., Ste. 630  
Chicago, Illinois 60605  
[PCB.Clerks@illinois.gov](mailto:PCB.Clerks@illinois.gov)

Division of Legal Counsel  
Illinois Environmental Protection Agency  
1021 North Grand Avenue East  
P.O. Box 19276  
Springfield IL 62794-9276  
[epa.dlc@illinois.gov](mailto:epa.dlc@illinois.gov)

\_\_\_\_\_  
*/s/ Ryan G. Rudich*  
Ryan G. Rudich

Dated: July 23, 2024

# **Exhibit A**



Prairie Hill Landfill  
18762 Lincoln Road  
Morrison, IL 61270

January 12, 2024

Ms. Jacki Cooperider, P.E.  
Manager, Permit Section  
IEPA - Bureau of Land  
1021 North Grand Ave. East  
Springfield, Illinois 62702

RE: **Prairie Hill RDF**  
**IEPA #1950350014 - Whiteside County, Illinois**  
**Permit 1994-579-LF**  
**Application to Accept Offsite Leachate for Disposal in Leachate Evaporator**

Dear Ms. Cooperider:

Submitted herein is an application for permit to allow the acceptance of offsite leachate for disposal in Prairie Hill Landfill's leachate evaporator. WM would like to utilize its excess capacity in the leachate evaporator as an alternative leachate disposal option for Peoria City-County Landfill No. 2 (PCC #2), a WM operated facility, located at 11501 West Cottonwood Road, Brimfield, IL 61517. PCC operates under landfill Permit No. 1996-089-LF and BOL ID No. 1438165003.

1. This letter;
2. LPC-PA1, General Application for Permit;
3. LPC-PA3, Treatment/Storage Facilities;
4. LPC-PA16, Public Notification Letters;
5. Section 39(i) Certifications;
6. Attachments

The information provided in this letter addresses the requirements in the LPC-PA3 form and is organized in the same order.

**Location Information**

Prairie Hill RDF is located in Sections 13, 14, 23, and 24, Township 21 North and Range 5 East of the Morrison Quadrangle. A copy of the USGS 7.5 minute Morrison Quadrangle showing the location of the facility is provided as Attachment 1.

## **Facility Background**

Prairie Hill RDF is an existing facility that began operation in 1995 under Permit No. 1994-579-LF. In April of 2023, the facility completed construction and began operation of a 40,000 gallon per day leachate evaporation unit for the disposal of site generated leachate. The facility currently has nine leachate collection cell sump risers as well as various wellfield leachate pumps that convey liquid via perimeter forcemain to a 20,000 gallon underground storage tank near the evaporator. Leachate from the underground tank is then pumped to a 40,000 gallon aboveground storage tank which is used to feed the evaporation unit.

The evaporator is currently managing approximately 20,000 gallons per day and has the capacity to receive and process additional leachate.

## **General Facility Information**

### *Plan Sheet of the Site*

The leachate evaporator unit is located on the northwest side of the closed landfill unit (near Phase 4, Cell 2) as shown on the Liquid Management Infrastructure and Evaporator Layout drawings included in Attachment 2.

### *Process Flow Diagram*

A Process Flow Diagram for offsite leachate acceptance operations is provided as Attachment 3.

### *Narrative Description of the Site's Offsite Leachate Acceptance Operations*

The evaporator unit is equipped to operate, as necessary, 24 hours per day / 7 days per week. The technology consists of injecting hot gas from landfill gas combustion into a reservoir containing leachate, which generates water vapor. The vapor is discharged directly to the atmosphere through three stacks of equal diameter and a concentrated residual is left behind. Fresh leachate is continuously fed into the reservoir and the residual is directed to a clarifier for further concentration of solids. The residual is removed from the clarifier and deposited in a temporary storage tank. Periodically, the solids are removed from the storage tank and deposited within the landfill for disposal.

As the evaporator is currently operating under its designed capacity, the site would like to utilize some of this excess capacity as an alternative disposal option for leachate from other WM operated facilities. Leachate will be hauled to the site via tanker truck, and the trucks will utilize the existing facility roads to reach the evaporator area. The existing underground storage tank near the evaporator is equipped with a load out pad that was used for emptying the tank prior to installation of the evaporator. This load out will be modified to allow tanker trucks to offload leachate directly into the underground tank, which is then pumped to the

aboveground tank to feed the evaporator. Locations of the underground tank and load out pad can be seen on the figures provided in Attachment 1.

#### *Waste Characterization and Analysis Plan*

The only waste to be accepted at the site as part of this operation will be leachate generated by PCC #2 . PCC #2 maintains analytical records for its site generated leachate, the composition of which is akin to typical landfill leachate.

#### *Residuals*

Leachate evaporated in the unit produces an approximately 8% - 10% by volume residual sludge. The residual is removed from the clarifier and deposited in a temporary storage tank. Periodically, the solids are removed from the storage tank and deposited within the landfill for disposal.

#### *Contingency Plan*

The operations being proposed in this application should not require an independent contingency plan. The only new operation being proposed is the offloading of leachate tanker trucks into an existing underground storage tank. The site will utilize the existing contingency plan included in the site operations plan approved under Permit No. 1994-579-LF.

#### *Containment System*

The underground storage tank that will be used for offloading of offsite leachate is equipped with a concrete loadout containment pad to prevent spills during leachate unloading. The aboveground storage tank that feeds the evaporator is a dual walled tank installed on a concrete containment pad. The evaporator building itself is fit with concrete containment and floor drains that collect any spills and convey these liquids back into the evaporation unit. No additional containment systems will be necessary.

#### *Run-on/Run-off*

The proposed operation will not have any impact on stormwater run-on/run-off. The site will continue to utilize the existing stormwater control measures.

#### *Inspection Procedures*

The evaporator has existing inspection and maintenance programs as part of routine operations, as well as the landfill's current Spill Prevention Control and Countermeasure Plan. No additional inspections for the proposed operations will be required. The offloading area near the underground storage tank will be monitored for leaks/spills when tankers are depositing leachate.

*Operating Record*

Leachate throughput in the evaporator is tracked by volume on an operating log. For offsite leachate, an additional column dedicated to offsite tanker trucks will be added to the log for tracking. An example of the current operating log for the month of September 2023 is included as Attachment 4.

A manifest generated by PCC #2 will accompany each tanker load brought to the site for disposal. This will include a date, manifest number, the generator's name (PCC #2), and the total gallons being received.

*Closure/Post-Closure Plan*

The operations being proposed in this application should not require an independent Closure/Post-Closure Plan. The site will utilize the existing plan approved under Permit No. 1994-579-LF.

*Site Suitability*

The operations proposed in this application are taking place at an existing landfill facility already determined to be suitable under Permit No. 1994-579-LF. The addition of these operations will not create any additional hazards to public health and safety.

Attached please find an original and two copies of this application.

Should you have any questions, please do not hesitate to contact me at 224-545-2229

Sincerely,

**Waste Management of Illinois, Inc.**

A handwritten signature in black ink, appearing to read 'JH' followed by a stylized flourish.

Joshua Hey, P.E.  
Engineer



# Illinois Environmental Protection Agency

1021 North Grand Avenue East • P.O. Box 19276 • Springfield • Illinois • 62794-9276 • (217) 782-3397

## General Application for Permit (LPC - PA1)

This form must be used for any application for permit from the Bureau of Land, except for landscape waste composting or hazardous waste management facilities regulated in accordance with RCRA, Subtitle C. One original, and two copies, or three if applicable, of all permit application forms must be submitted. Attach the original and appropriate number of copies of any necessary plans, specifications, reports, etc. to fully support and describe the activities and modifications being proposed. Attach sufficient information to demonstrate the compliance with all regulatory requirements. Incomplete applications will be rejected. Please refer to the instructions for further guidance. **Note: Applicants must provide a physical address; the post office will not deliver a certified letter (final action letter) to a P.O. Box only. Please provide an extended ZIP+4 code for the site identification and owner/operator information.**

You may complete this form online, save a copy locally, print, sign and submit it to the Bureau of Land at the address below. Note: Hand-delivered permit applications must be delivered between 8:30 am and 5:00 pm, Monday through Friday (excluding State holidays) to

Bureau of Land, Permit Section, Mail Code #33  
1021 North Grand Avenue East, P.O. Box 19276  
Springfield, IL 62794-9276

[Instructions](#)

### I. Site Identification

Site Name: Prairie Hill RDF IEPA BOL No. 1950350014  
 Street Address: 18762 Lincoln Road P.O. Box: \_\_\_\_\_  
 City: Morrison State: IL Zip + 4: \*61270-9587 \*Notification letters will not be sent without a 9-digit zip code. County: Whiteside  
 Existing DE/OP Permit Numbers (if applicable): 1994-579-LF

### II. Applicant Identification

#### Owner

Name: County of Whiteside  
 Street Address: 200 E. Knox Street  
 PO Box: \_\_\_\_\_  
 City: Morrison State: IL  
 Zip + 4: 61270-9587 Phone: 815 772-7651  
 Contact: Russ Renner  
 Email Address: rrenner@whiteside.org  
 FEIN ID No. \_\_\_\_\_

#### Operator (if Different)

Name: Waste Management of Illinois, Inc.  
 Street Address: 18762 Lincoln Road  
 PO Box: \_\_\_\_\_  
 City: Morrison State: IL  
 Zip + 4: 61270-9587 Phone: 224-525-2229  
 Contact: Joshua Hey  
 Email Address: jhey@wm.com  
 FEIN ID No. \_\_\_\_\_

Agency correspondence mailed to:

Owner  Operator  Other - Explain: \_\_\_\_\_

#### TYPE OF SUBMISSION/REVIEW PERIOD:

- New Landfill/180 days (35 IAC Part 813)
- Landfill Expansion/180 days (35 IAC Part 813)
- Sig. Mod. to Operate/90 days (35 IAC Part 813)
- Other Sig. Mod./90 days (35 IAC Part 813)
- Renewal of Landfill/90 days (35 IAC Part 813)
- Development/90 days (35 IAC Part 807)
- Operating/45 days (35 IAC Part 807)
- Operating/90 days (35 IAC Part 848)
- Supplemental/90 days (35 IAC Part 807)
- Permit Transfer/90 days (35 IAC Part 807)
- Renewal of Experimental Permit (35 IAC Part 807)

#### TYPE OF FACILITY:

- Landfill
- Land Treatment
- Transfer Station
- Treatment Facility
- Storage
- Incinerator
- Composting
- Recycling/Reclamation
- Used Tire Storage/Processing Facility
- Other (Specify)

#### TYPE OF WASTE:

- General Municipal Refuse
- Hazardous
- Special (Non-Hazardous)
- Chemical Only (exec. putrescible)
- Inert Only (exec. chem. & putrescible)
- Used Oil
- Potentially Infectious Medical Waste
- Landscape/Yard Waste
- Used Tires
- Other (Specify)

This Agency is authorized to require this information under Section 4 and Title X of the Environmental Protection Act (415 ILCS 5/4, 5/39). Failure to disclose this information may result in: a civil penalty of not to exceed \$50,000 for the violation and an additional civil penalty of not to exceed \$10,000 for each day during which the violation continues (415 ILCS 5/42).

**III. Description of this Permit Request:** (Note: The box below will expand as needed)

Application requesting accept offsite leachate from other WM operated facilities for disposal in the leachate evaporator

**IV. Completeness Requirements**

1. Have all required public notice letters been mailed in accordance with the LPC-PA16 instructions? Yes  No  N/A

(If so, provide a list of those recipients of the required public notice letters for Illinois EPA retention.

Such retention shall not imply any Illinois EPA review and/or confirmation of the list.)

**Public Notice Recipients**

Name: <u>Hon. Tony McCombie</u>	Title: <u>Representative District 71</u>
Street Address: <u>2510 Locust Street</u>	P.O. Box: _____
City: <u>Sterling</u> State: <u>IL</u>	Zip Code: <u>61081</u>
Name: <u>Hon. Neil Anderson</u>	Title: <u>Senate District 36</u>
Street Address: <u>1523 47th Avenue, Suite 2</u>	P.O. Box: _____
City: <u>Moline</u> State: <u>IL</u>	Zip Code: <u>61265</u>
Name: <u>Illinois State's Attorney</u>	Title: <u>State's Attorney</u>
Street Address: <u>200 E. Knox Street</u>	P.O. Box: _____
City: <u>Morrison</u> State: <u>IL</u>	Zip Code: <u>61270</u>
Name: <u>James Duffy</u>	Title: <u>County Board Chairman</u>
Street Address: <u>200 E. Knox Street</u>	P.O. Box: _____
City: <u>Morrison</u> State: <u>IL</u>	Zip Code: <u>61270</u>
Name: <u>Morrison City Clerk</u>	Title: <u>City Clerk</u>
Street Address: <u>200 W. Main Street</u>	P.O. Box: _____
City: <u>Morrison</u> State: <u>IL</u>	Zip Code: <u>61270</u>
Name: <u>Whiteside County Clerk</u>	Title: <u>County Clerk</u>
Street Address: <u>200 E. Knox Street</u>	P.O. Box: _____
City: <u>Morrison</u> State: <u>IL</u>	Zip Code: <u>61270</u>
Name: <u>Mt. Pleasant Township Clerk</u>	Title: <u>Township Clerk</u>
Street Address: <u>210 W. Morris Street</u>	P.O. Box: _____
City: <u>Morrison</u> State: <u>IL</u>	Zip Code: <u>61270</u>
Name: <u>Hopkins Township Clerk</u>	Title: <u>Township Clerk</u>
Street Address: <u>24719 Emerson Road</u>	P.O. Box: _____
City: <u>Sterling</u> State: <u>IL</u>	Zip Code: <u>61081</u>
Name: <u>Lyndon Township</u>	Title: <u>Township Clerk</u>
Street Address: <u>302 2nd Avenue St.</u>	P.O. Box: _____
City: <u>Lyndon</u> State: <u>IL</u>	Zip Code: <u>61261</u>

- |  | Yes                              | No                               | N/A                              |
|--|----------------------------------|----------------------------------|----------------------------------|
| 2. a. Is the Siting Certification Form (LPC-PA8) completed and enclosed?                               | <input type="radio"/>            | <input type="radio"/>            | <input checked="" type="radio"/> |
| b. Is siting approval currently under litigation?  | <input type="radio"/>            | <input type="radio"/>            | <input checked="" type="radio"/> |
| 3. a. Is a closure, and if necessary a post-closure plan covering these activities being submitted, or | <input type="radio"/>            | <input checked="" type="radio"/> | <input type="radio"/>            |
| b. has one already been approved?  | <input checked="" type="radio"/> | <input type="radio"/>            | <input type="radio"/>            |



If yes, provide the permit number: 1994-579

- 4. a. For operating waste disposal sites, only: Has any employee, owner, operator, officer or director of the owner or operator had a prior conduct certification denied, canceled or revoked?
- b. Have you included a demonstration of how you comply or intend to comply with 35 Ill. Adm. Code 745?
- 5. a. For waste disposal sites, only: Is the property for the facility held in a beneficial trust?
- b. If yes, is a beneficial trust certification form (LPC-PA9) completed and enclosed?
- 6. a. Does the application contain information or proposals regarding the hydrogeology; groundwater monitoring, modeling or classification; a groundwater impact assessment; or vadosezone monitoring for which you are requesting approval?
- b. If yes, have you submitted a third copy of the application (4 total) and supporting documents?
- 7. Has the required 39(i) certification been attached? A 39(i) certification must be submitted with information concerning the following persons or entities:
  - a. the owner of the business entity applying for the permit;
  - b. the operator of the business entity applying for the permit;
  - c. each employee or officer of the owner or operator who signed the permit application or has managerial authority at the site; and
  - d. any additional owner, operator, or officer or employee of the owner or operator from whom a certification is requested by the Illinois EPA, including any officer or employee who will be responsible for overseeing or implementing regulated activities governed by the permit.

If no, then complete this certification as indicated.

**V. Signatures:**

Original signatures are required. Signature stamps or applications transmitted electronically or by FAX are not acceptable.

All applications shall be signed by the person designated below as a duly authorized representative of the owner an/or operator. A printed name for each signature should also be provided.


- Corporation - By a principal executive officer of the level of vice-president or above
- Partnership or Sole Proprietorship - By a general partner or the proprietor, respectively.
- Government - By either a principal executive officer or a ranking elected official.

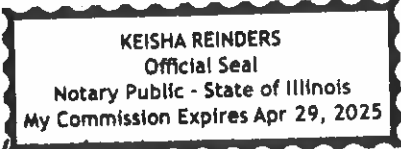
A person is a duly authorized representative of the owner and operator only if:

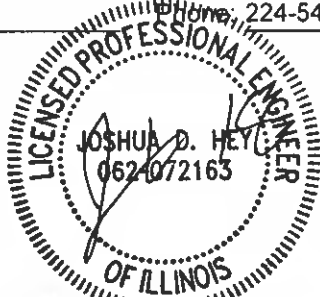
1. They meet the criteria above or the authorization has been granted in writing by a person described above; and
2. Is submitted with this application (a copy of a previously submitted authorization can be used).

I hereby affirm that all information contained in this application is true and accurate to the best of my knowledge and belief. I do herein swear that I am a duly authorized representative of the owner/operator and I am authorized to sign this permit application form.

**Any person who knowingly makes a false, fictitious, or fraudulent material statement, orally or in writing, to the Illinois EPA commits a Class 4 felony. A second or subsequent offense after conviction is a Class 3 felony. (415 ILCS 5/44(h))**

<p><u>Martin Koster</u>                  _____                  Owner Signature</p> <p><u>Martin Koster</u>                  _____                  Printed Name</p>	<p><u>10/6/2023</u>                  _____                  Date</p> <p><u>County Board Chairman</u>                  _____                  Title</p>
<p><b>Notary:</b> Subscribed and Sworn before me                  this <u>10</u> day of <u>Oct</u> 20<u>23</u>.</p>	
	
<p>My commission expires on: <u>April 11 2027</u></p>	
<p><u>Dawn Housenga</u>                  _____                  Signature &amp; Stamp/Seal of Notary Public</p>	

<p><u>Joshua Hey</u>                  _____                  Operator Signature</p> <p><u>Joshua Hey</u>                  _____                  Printed Name</p>	<p><u>11/2/2023</u>                  _____                  Date</p> <p><u>Engineer</u>                  _____                  Title</p>
<p><b>Notary:</b> Subscribed and Sworn before me                  this <u>2</u> day of <u>November</u> 20<u>23</u>.</p>	
	
<p>My commission expires on: <u>April 29, 2025</u></p>	
<p><u>Keisha Reinders</u>                  _____                  Signature &amp; Stamp/Seal of Notary Public</p>	

<p>Engineer's Name: <u>Joshua Hey, P.E.</u></p> <p>Company: <u>WM</u></p> <p>Street Address: <u>18370 Somonauk Road</u></p> <p>City: <u>Dekalb</u> State: <u>IL</u></p> <p>Email Address: <u>jhey@wm.com</u></p> <p>License Expiration Date: <del>Nov 20, 2025</del> <u>11/30/2025</u></p>	<p>Engineer's Title: <u>Engineer</u></p> <p>Registration Number: <u>062-072163</u></p> <p>PO Box: _____</p> <p>Zip Code: <u>60115</u> Phone: <u>224-545-2229</u></p>
<p>Signature: <u>Joshua Hey</u>                  _____</p>	
<p>Date: <u>1/12/2024</u></p>	
	



# Illinois Environmental Protection Agency

1021 North Grand Avenue East • P.O. Box 19276 • Springfield • Illinois • 62794-9276 • (217) 782-3397

## Application for a Solid Waste Management Permit to Develop Treatment and/or Storage Facilities (LPC-PA3)

Persons requesting a permit to develop a new solid waste treatment, storage, incineration, recycling, or land treatment site or requesting a permit for the first time for such a facility should use this application form. Facilities that are expanding, or adding new units (i.e., new storage area, new treatment units, etc.) should utilize this application as guidance, but the completed form is not required. Note: Hand-delivered Permit applications must be delivered between 8:30 am and 5:00 pm, Monday through Friday (excluding State holidays) to:

Bureau of Land, Permit Section, Mail Code #33  
 1021 North Grand Avenue East, P.O. Box 19276  
 Springfield, IL 62794-9276

You may also complete this form in Acrobat, save a copy, print, sign, and submit it to the Bureau of Land, Permit Section at the above address.

### I. Site Identification

Site Name: Prairie Hill RDF IEPA BOL No.: 1950350014  
 Street Address: 18762 Lincoln Road P.O. Box: \_\_\_\_\_ County: Whiteside  
 City: Morrison State: IL Zip + 4: 61270-9587 Notification letters will not be sent without a 9-digit zip code.

### II. Applicant Identification

<p>1. <b>Owner</b>                  Name: <u>County of Whiteside</u>                  Street Address: <u>200 E. Knox Street</u>                  PO Box: _____                  City: <u>Morrison</u> State: <u>IL</u>                  Zip + 4: <u>61270-9587</u> Phone: <u>815-772-7651</u>                  Contact: <u>Russ Renner</u>                  Email Address: <u>rrenner@whiteside.org</u>                  FEIN ID No. _____</p>	<p><b>Operator (if different)</b>                  Name: <u>Waste Management of Illinois, Inc.</u>                  Street Address: <u>18762 Lincoln Road</u>                  PO Box: _____                  City: <u>Morrison</u> State: <u>IL</u>                  Zip + 4: <u>61270-9587</u> Phone: <u>224-545-2229</u>                  Contact: <u>Joshua Hey</u>                  Email Address: <u>jhey@wm.com</u>                  FEIN ID No. _____</p>
--	---

### 2. Ownership and Operator Status:

Owner	Operator	
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Corporation (ILL)
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Government Body
<input type="checkbox"/>	<input type="checkbox"/>	Individual
<input type="checkbox"/>	<input type="checkbox"/>	Partnership
<input type="checkbox"/>	<input type="checkbox"/>	Sole Proprietor
<input type="checkbox"/>	<input type="checkbox"/>	Trust
<input type="checkbox"/>	<input type="checkbox"/>	Other: _____

**Land is Owned by:**

Owner  
 Operator  
 Leased by Applicant  
 Leased by Applicant for \_\_\_ years  
 Years of Lease Remaining: \_\_\_  
 Beginning Date of Lease: \_\_\_\_\_  
 Expiration Date of Lease: \_\_\_\_\_

Held in Trust\*  
 Name of Trust: \_\_\_\_\_

\*(Note: Lands that are held in trust and owners and operators of disposal sites must complete form LPC-PA9.)

### III. Location Information

Attach a copy of the United States Geological Survey (USGS) quadrangle map (7.5 minute quadrangle, if published) and/or a topographic map of the area which contains the site. Also provide a legal description of the site.

Name of Quadrangle Map provided: Morrison Quadrangle Date: 2021  
423 Acres in \_\_\_\_\_ Quarter, \_\_\_\_\_ Quarter, \_\_\_\_\_ Quarter, of Section 13,14,23,24  
 Township 21N, Range 5 East P.M. Local Description: Lot \_\_\_\_\_ Block \_\_\_\_\_

Present Zoning Classification and Restrictions (if any): \_\_\_\_\_

This Agency is authorized to require this information under Section 4 and Title X of the Environmental Protection Act (415 ILCS 5/4, 5/39). Failure to disclose this information may result in: a civil penalty of not to exceed \$50,000 for the violation and an additional civil penalty of not to exceed \$10,000 for each day during which the violation continues (415 ILCS 5/42).

**IV. Facility Background**

- This is an existing facility. Operation began: 7/10/1995
- This is a proposed development.
- This is a proposed expansion to an existing facility. IEPA BOL No.: 1994-579-LF
- Other existing environmental facility permits: \_\_\_\_\_

Consult instructions for the contents of Sections V-VIII.

**V. General Facility Information**

The following information must accompany the application. Please indicate the location in the application for the document being submitted for this application.

Page number or location of information	
Attachment 2	1. A plan sheet of the site
Attachment 3	2. A process flow diagram of the treatment or storage operation
Page 2 Letter	3. A narrative description of the site's operation, including the days and hours of operation
Page 3 Letter	4. Waste characterization plan (Identify wastes to be accepted and how they are to be managed.)
Page 3 Letter	5. Waste analysis plan (a description of analysis methods used to screen and test waste types)
Page 3 Letter	6. Residuals (a description of methods used to treat, transfer or dispose of residual wastes generated from the operation of the site)
Page 3 Letter	7. Contingency plan
Page 3 Letter	8. Containment system
Page 3 Letter	9. Run-on/Run-off
Page 3 Letter	10. A description of inspection procedures
Page 4 Letter	11. Operating record
Page 4 Letter	12. Closure plan
Page 4 Letter	13. Post closure use of site
Page 4 Letter	14. Site suitability

**VI. Treatment and/or Storage**

1. This application is for treatment  and/or storage  in the following: (check the appropriate box(es)):

- Tanks
- Surface Impoundments
- Drums
- Waste Piles
- Barrels
- Landfarms
- Roll-off Boxes
- Other: Leachate Evaporator

2. General Information: For each box checked above, provide the following information, where applicable.

- A. Location drawings
- B. Material of construction
- C. Number of units
- D. Duration of storage
- E. Age of units
- F. Type of waste(s) contained in each area
- G. Tank Design
- H. Container design
- I. Surface Impoundment and waste pile design
- J. Treatment processes

**VII. Incineration/Thermal Treatment**

Is an incinerator or thermal treatment unit included in this application? (Refer to the instructions).  Yes  No

**VIII. Hydrogeology**

Is a site hydrogeology plan required for this application?  Yes  No (Refer to the instructions).



# Illinois Environmental Protection Agency

1021 North Grand Avenue East • P.O. Box 19276 • Springfield • Illinois • 62794-9276 • (217) 782-3397

## 39(i) Certification for Operating a Waste Management Facility

*Pursuant to 415 ILCS 5/39(i), prior to issuing any RCRA permit, or any permit for a waste storage site, sanitary landfill, waste disposal site, waste transfer station, waste treatment facility, waste incinerator, clean construction or demolition debris fill operation, or used tire storage site, the Illinois EPA must conduct an evaluation of the prospective owner's or operator's prior experience in waste management operations, clean construction or demolition debris fill operations, and tire storage site management. As part of that evaluation please complete and submit this form with your permit application.*

This form may be completed online and saved locally before printing, signing and submitting it to the Illinois EPA at the address below. If the form is completed manually, please type or print clearly.

Illinois Environmental Protection Agency  
Division of Land Pollution Control - #33  
39(i) Certification  
1021 North Grand Avenue East  
P.O. Box 19276  
Springfield, IL 62794-9276

### I. Applicant Information

Site Name Prairie Hill RDF IEPA BOL No.: 1950350014

Site Address 18762 Lincoln Road

City: Morrison State: IL Zip Code: 61270-9587

Permit Numbers (if applicable): 1994-579-LF

#### Owner

Owner Name: County of Whiteside

Street Address: 18819 Lincoln Road

City: Morrison State: IL Zip: 61270

#### Operator

Operator Name: Waste Management of Illinois, Inc.

Street Address: 18762 Lincoln Road

City: Morrison State: IL Zip: 61270

Is this 39(i) certification for the owner or the operator?

Owner  Operator  Owner and operator are the same entity

### II. Officers and Employees with Site Responsibility

Unless the owner and operator are the same entity, a separate 39(i) form must be submitted for both the owner and operator. Persons operating under the authority of the owner should be listed on the owner's 39(i) form and persons operating under authority of the operator should be listed on the operator's 39(i) form.

A. Officers: List the name and title of all officers of the owner or operator that will have personal involvement or active participation in the operation or management of the site or facility for which the application is submitted.

Name	Title

B. Employees: List the name and title of each employee of the owner or operator that will have personal involvement or active participation in the overall operation or management of the site or facility for which the application is submitted (e.g. site managers, site engineers, and other persons who direct or control the overall day-to-day management of the operation, but not persons whose duties are exclusively limited to equipment operation, labor, or similar non-managerial functions).

Name	Title
Josh Hey (as agent of WM, not as individual)	Engineer III

III. Owner, Operator, Officer, and Employee Information

A. Prior Conduct Identification

The applicant must answer each of the following questions for every owner or operator, and for any officer or employee identified under Section II. If the answer to any of the following questions is affirmative, the applicant must complete an Attachment A for each person for whom the answer is affirmative and include a copy of each final administrative or judicial determination that required an affirmative response. If the information for each owner, operator, officer, and employee has not changed since the applicant's last submission of a 39(i) certification, the applicant can skip to Section III(C), below.

- 1) Has there been a finding that any person named in Section II violated federal, State, or local laws, regulations, standards, or ordinances in the operation of one or more waste management facilities or sites, clean construction or demolition debris fill operation facilities or sites, or tire storage sites?  Yes  
 No
- 2) Has any person named in Section II ever been convicted in this or another State of any crime which is a felony under the laws of this State, or convicted of a felony in a federal court; or convicted in this or another state or federal court of any of the following crimes: forgery, official misconduct, bribery, perjury, or knowingly submitting false information under any environmental law, regulation, or permit term or condition?  Yes  
 No
- 3) Has there been a finding against any person named in Section II of gross carelessness or incompetence in handling, storing, processing, transporting or disposing of waste, clean construction or demolition debris, or used or waste tires, or a finding of gross carelessness or incompetence in using clean construction or demolition debris as fill?  Yes  
 No

B. Pending Proceedings

The applicant must answer each of the following questions for every owner or operator, and for any officer or employee identified in Section II. If the answer to any of the following questions is affirmative, the applicant must complete an Attachment A for each person for whom the answer is affirmative and provide information identified in Attachment A regarding the pending proceeding.

- 1. Is there any proceeding currently pending against any person named in Section II that could result in a conviction or finding described in subsection A, above?  Yes  
 No
- 2. Is there any proceeding currently pending against any person named in Section II that could result in the reversal of a conviction or finding described in subsection A, above?  Yes  
 No

C. Prior Application Information

If (i) the applicant has previously submitted the Attachments required pursuant to subsections A and B above and (ii) the Attachments previously submitted are still complete, true, and correct, then the applicant does not need to include Attachments with this submission if the following box is checked:

By checking this box, I affirm that the Attachments previously submitted are still complete, true, and correct and wish to incorporate them into this Certification.

If the above box is checked, identify the application that contains the previously submitted Attachments that are complete, true, and correct.

**Authorization for Release of Information**

This Certification must be signed by an officer of the applicant.


The undersigned authorizes any representative of the Illinois Environmental Protection Agency bearing this release to obtain any information from the Illinois State Police pertaining to the criminal records of the applicant and hereby directs the Illinois State Police to release such information upon request of the bearer. The undersigned authorizes a review of and full disclosure of all records, or any part thereof, concerning the applicant's criminal records by and to a duly authorized agent of the Illinois Environmental Protection Agency, whether the records are of public, private, or confidential nature. The intent of this authorization is to give consent for full and complete disclosure of the applicant's criminal records.

The undersigned fully understands that any information which is developed directly or indirectly, in whole or in part, as a result of this authorization will be considered in determining whether a permit shall be issued by the Illinois Environmental Protection Agency under the Environmental Protection Act [415 ILCS 5]. The undersigned further agrees to release the Illinois State Police and the Illinois Environmental Protection Agency, its agents and designees under this release, from any and all liability which may be incurred as a result of compliance with this authorization for release of information.

**Certification Statements**

I certify under penalty of law that the information submitted, including information on any Attachments submitted as part of or incorporated into this Certification, is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

**Any person who knowingly makes a false, fictitious, or fraudulent material statement, orally or in writing, to the Illinois EPA commits a Class 4 felony. A second or subsequent offense after conviction is a Class 3 felony. (415 ILCS 5/44(h))**

  
\_\_\_\_\_  
Signature of Applicant Officer

1/12/2024  
\_\_\_\_\_  
Date

Josh Hey (as agent of WM, not as individual)  
\_\_\_\_\_  
Printed Name

Engineer III  
\_\_\_\_\_  
Title



# Illinois Environmental Protection Agency

1021 North Grand Avenue East • P.O. Box 19276 • Springfield • Illinois • 62794-9276 • (217) 782-3397

## 39(i) Certification for Operating a Waste Management Facility

Pursuant to 415 ILCS 5/39(i), prior to issuing any RCRA permit, or any permit for a waste storage site, sanitary landfill, waste disposal site, waste transfer station, waste treatment facility, waste incinerator, clean construction or demolition debris fill operation, or used tire storage site, the Illinois EPA must conduct an evaluation of the prospective owner's or operator's prior experience in waste management operations, clean construction or demolition debris fill operations, and tire storage site management. As part of that evaluation please complete and submit this form with your permit application.

This form may be completed online and saved locally before printing, signing and submitting it to the Illinois EPA at the address below. If the form is completed manually, please type or print clearly.

Illinois Environmental Protection Agency  
Division of Land Pollution Control - #33  
39(i) Certification  
1021 North Grand Avenue East  
P.O. Box 19276  
Springfield, IL 62794-9276

### I. Applicant Information

Site Name Prairie Hill RDF IEPA BOL No.: 1950350014

Site Address 18762 Lincoln Road

City: Morrison State: IL Zip Code: 61270-9587

Permit Numbers (if applicable): 1994-579-LF

Owner  
Owner Name: County of Whiteside  
Street Address: 18819 Lincoln Road  
City: Morrison State: IL Zip: 61270

Operator  
Operator Name: Waste Management of Illinois, Inc.  
Street Address: 18762 Lincoln Road  
City: Morrison State: IL Zip: 61270

Is this 39(i) certification for the owner or the operator?

Owner       Operator       Owner and operator are the same entity

### II. Officers and Employees with Site Responsibility

Unless the owner and operator are the same entity, a separate 39(i) form must be submitted for both the owner and operator. Persons operating under the authority of the owner should be listed on the owner's 39(i) form and persons operating under authority of the operator should be listed on the operator's 39(i) form.

A. Officers: List the name and title of all officers of the owner or operator that will have personal involvement or active participation in the operation or management of the site or facility for which the application is submitted.

Name	Title



B. Employees: List the name and title of each employee of the owner or operator that will have personal involvement or active participation in the overall operation or management of the site or facility for which the application is submitted (e.g. site managers, site engineers, and other persons who direct or control the overall day-to-day management of the operation, but not persons whose duties are exclusively limited to equipment operation, labor, or similar non-managerial functions).

Name	Title
Russell Renner, P.E.	County Engineer
Martin Koster	County Board Chairman

III. Owner, Operator, Officer, and Employee Information

A. Prior Conduct Identification

The applicant must answer each of the following questions for every owner or operator, and for any officer or employee identified under Section II. If the answer to any of the following questions is affirmative, the applicant must complete an Attachment A for each person for whom the answer is affirmative and include a copy of each final administrative or judicial determination that required an affirmative response. If the information for each owner, operator, officer, and employee has not changed since the applicant's last submission of a 39(i) certification, the applicant can skip to Section III(C), below.

- 1) Has there been a finding that any person named in Section II violated federal, State, or local laws, regulations, standards, or ordinances in the operation of one or more waste management facilities or sites, clean construction or demolition debris fill operation facilities or sites, or tire storage sites?  Yes  
 No
- 2) Has any person named in Section II ever been convicted in this or another State of any crime which is a felony under the laws of this State, or convicted of a felony in a federal court; or convicted in this or another state or federal court of any of the following crimes: forgery, official misconduct, bribery, perjury, or knowingly submitting false information under any environmental law, regulation, or permit term or condition?  Yes  
 No
- 3) Has there been a finding against any person named in Section II of gross carelessness or incompetence in handling, storing, processing, transporting or disposing of waste, clean construction or demolition debris, or used or waste tires, or a finding of gross carelessness or incompetence in using clean construction or demolition debris as fill?  Yes  
 No

B. Pending Proceedings

The applicant must answer each of the following questions for every owner or operator, and for any officer or employee identified in Section II. If the answer to any of the following questions is affirmative, the applicant must complete an Attachment A for each person for whom the answer is affirmative and provide information identified in Attachment A regarding the pending proceeding.

- 1. Is there any proceeding currently pending against any person named in Section II that could result in a conviction or finding described in subsection A, above?  Yes  
 No
- 2. Is there any proceeding currently pending against any person named in Section II that could result in the reversal of a conviction or finding described in subsection A, above?  Yes  
 No

C. Prior Application Information

If (i) the applicant has previously submitted the Attachments required pursuant to subsections A and B above and (ii) the Attachments previously submitted are still complete, true, and correct, then the applicant does not need to include Attachments with this submission if the following box is checked:

By checking this box, I affirm that the Attachments previously submitted are still complete, true, and correct and wish to incorporate them into this Certification.

If the above box is checked, identify the application that contains the previously submitted Attachments that are complete, true, and correct.

**Authorization for Release of Information**

This Certification must be signed by an officer of the applicant.

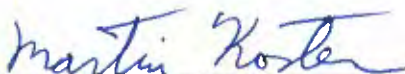
The undersigned authorizes any representative of the Illinois Environmental Protection Agency bearing this release to obtain any information from the Illinois State Police pertaining to the criminal records of the applicant and hereby directs the Illinois State Police to release such information upon request of the bearer. The undersigned authorizes a review of and full disclosure of all records, or any part thereof, concerning the applicant's criminal records by and to a duly authorized agent of the Illinois Environmental Protection Agency, whether the records are of public, private, or confidential nature. The intent of this authorization is to give consent for full and complete disclosure of the applicant's criminal records.

The undersigned fully understands that any information which is developed directly or indirectly, in whole or in part, as a result of this authorization will be considered in determining whether a permit shall be issued by the Illinois Environmental Protection Agency under the Environmental Protection Act [415 ILCS 5]. The undersigned further agrees to release the Illinois State Police and the Illinois Environmental Protection Agency, its agents and designees under this release, from any and all liability which may be incurred as a result of compliance with this authorization for release of information.

**Certification Statements**

I certify under penalty of law that the information submitted, including information on any Attachments submitted as part of or incorporated into this Certification, is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

**Any person who knowingly makes a false, fictitious, or fraudulent material statement, orally or in writing, to the Illinois EPA commits a Class 4 felony. A second or subsequent offense after conviction is a Class 3 felony. (415 ILCS 5/44(h))**



Signature of Applicant Officer



Date

Martin Koster

Printed Name

County Board Chairman

Title



# Illinois Environmental Protection Agency

Bureau of Land • 1021 N. Grand Avenue E. • Box 19276 • Springfield • Illinois • 62794-9276

## Notice of Application for Permit to Manage Waste (LPC-PA16)

Date: January 12, 2024

### To Elected Officials and Concerned Citizens:

The purpose of this notice is to inform you that a permit application has been submitted to the Illinois EPA, Bureau of Land, for a solid waste project described below. You are not obligated to respond to this notice, however, if you have any comments, please submit them in writing to the Bureau of Land, Attn: Permit Section, at the above address, or contact the Permit Section at 217/524-3300 within 21 days.

**NOTE: Please complete this form online, save a copy locally, print and submit it to the Permit Section #33, at the above.**

The permit application, which is identified below, is for a project described at the bottom of this page.

### Site Identification:

Site Name: Prairie Hill RDF IEPA ID Number: 1950350014

Street Address: 18762 Lincoln Road P.O. Box: \_\_\_\_\_

City: Morrison State: IL Zip Code: 61270 County: Whiteside

#### TYPE OF PERMIT SUBMISSIONS:

#### TYPE OF FACILITY:

#### TYPE OF WASTE:

- |  |  |   |
|--|--|---|
| <input type="checkbox"/> New Landfill                        | <input checked="" type="checkbox"/> Landfill   | <input checked="" type="checkbox"/> General Municipal Refuse    |
| <input type="checkbox"/> Landfill Expansion                  | <input type="checkbox"/> Land Treatment        | <input type="checkbox"/> Hazardous                              |
| <input type="checkbox"/> First Significant Modification      | <input type="checkbox"/> Transfer Station      | <input checked="" type="checkbox"/> Special (Non-Hazardous)     |
| <input type="checkbox"/> Significant Modification to Operate | <input type="checkbox"/> Treatment Facility    | <input type="checkbox"/> Chemical Only (exec. putrescible)      |
| <input type="checkbox"/> Other Significant Modification      | <input type="checkbox"/> Storage               | <input type="checkbox"/> Inert Only (exec. chem. & putrescible) |
| <input type="checkbox"/> Renewal of Landfill                 | <input type="checkbox"/> Incinerator           | <input type="checkbox"/> Used Oil                               |
| <input type="checkbox"/> Development                         | <input type="checkbox"/> Composting            | <input type="checkbox"/> Solvents                               |
| <input checked="" type="checkbox"/> Operating                | <input type="checkbox"/> Recycling/Reclamation | <input type="checkbox"/> Landscape/Yard Waste                   |
| <input type="checkbox"/> Supplemental                        | <input type="checkbox"/> Other (Specify)       | <input type="checkbox"/> Other (Specify)                        |
| <input type="checkbox"/> Transfer                            | _____  | _____   |
| <input type="checkbox"/> Name Change                         | _____  | _____   |
| <input type="checkbox"/> Generic                             | _____  | _____   |

### Description of Project:

Application proposing to accept off site leachate from other WM operated facilities for processing in the leachate evaporator

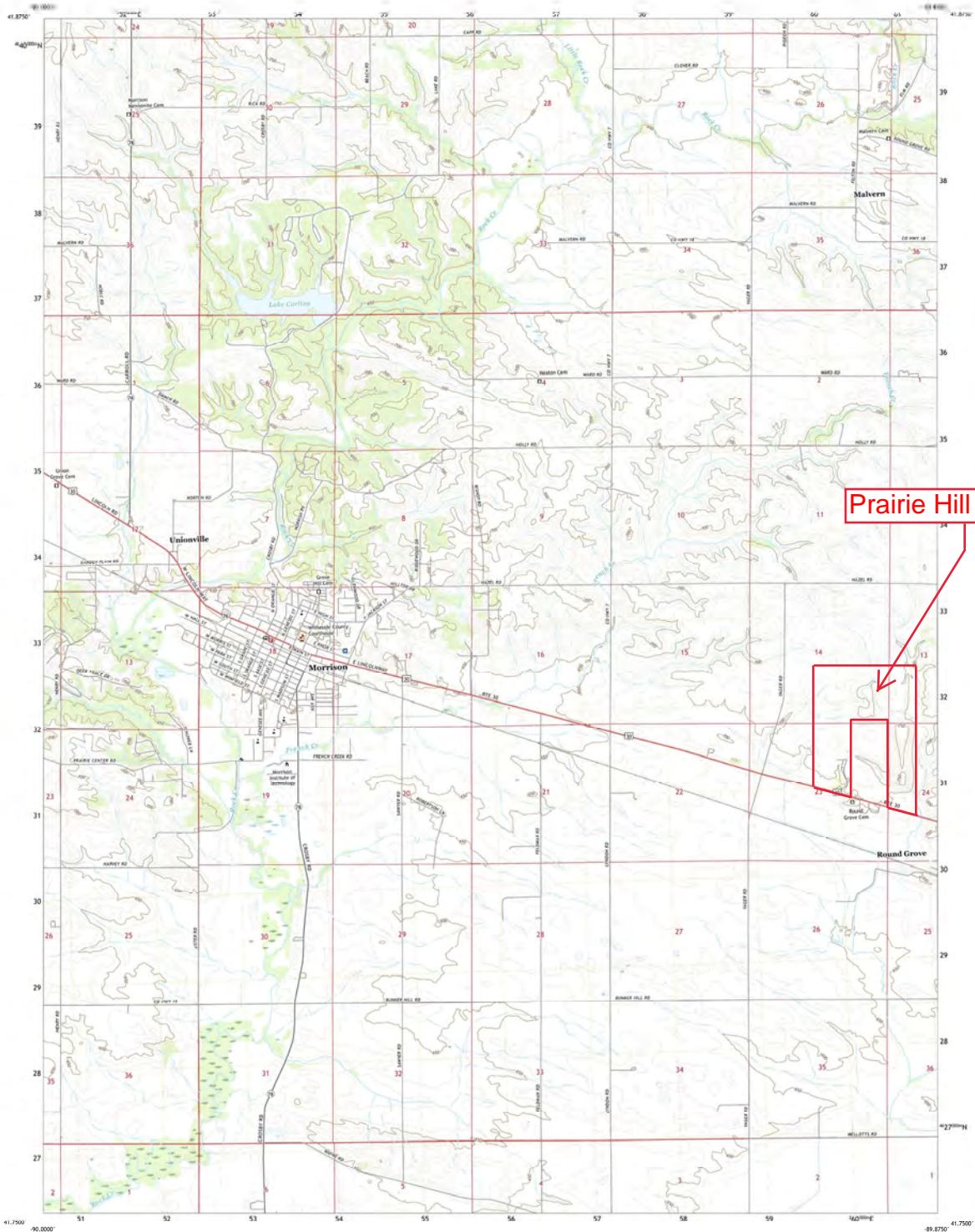
**ATTACHMENT 1**  
**SITE LOCATION MAP**



U.S. DEPARTMENT OF THE INTERIOR  
U.S. GEOLOGICAL SURVEY



MORRISON QUADRANGLE  
ILLINOIS - WHITEHSE COUNTY  
7.5-MINUTE SERIES



Prairie Hill Landfill

Produced by the United States Geological Survey  
North American Datum of 1983 (NAD83)  
World Geodetic System of 1984 (WGS84) Projection used  
1:50,000 scale projection to provide horizontal. Date 10/1/18  
This map is not a legal document. Boundary lines are  
generalized for this map scale. Property lines without government  
survey data are for general information only. State permission is  
required for other uses.

Scale bar and coordinate information



1:24,000  
NATIONAL CENTER OF GEOGRAPHIC INFORMATION  
This map was produced in cooperation with the  
Illinois Department of Transportation.

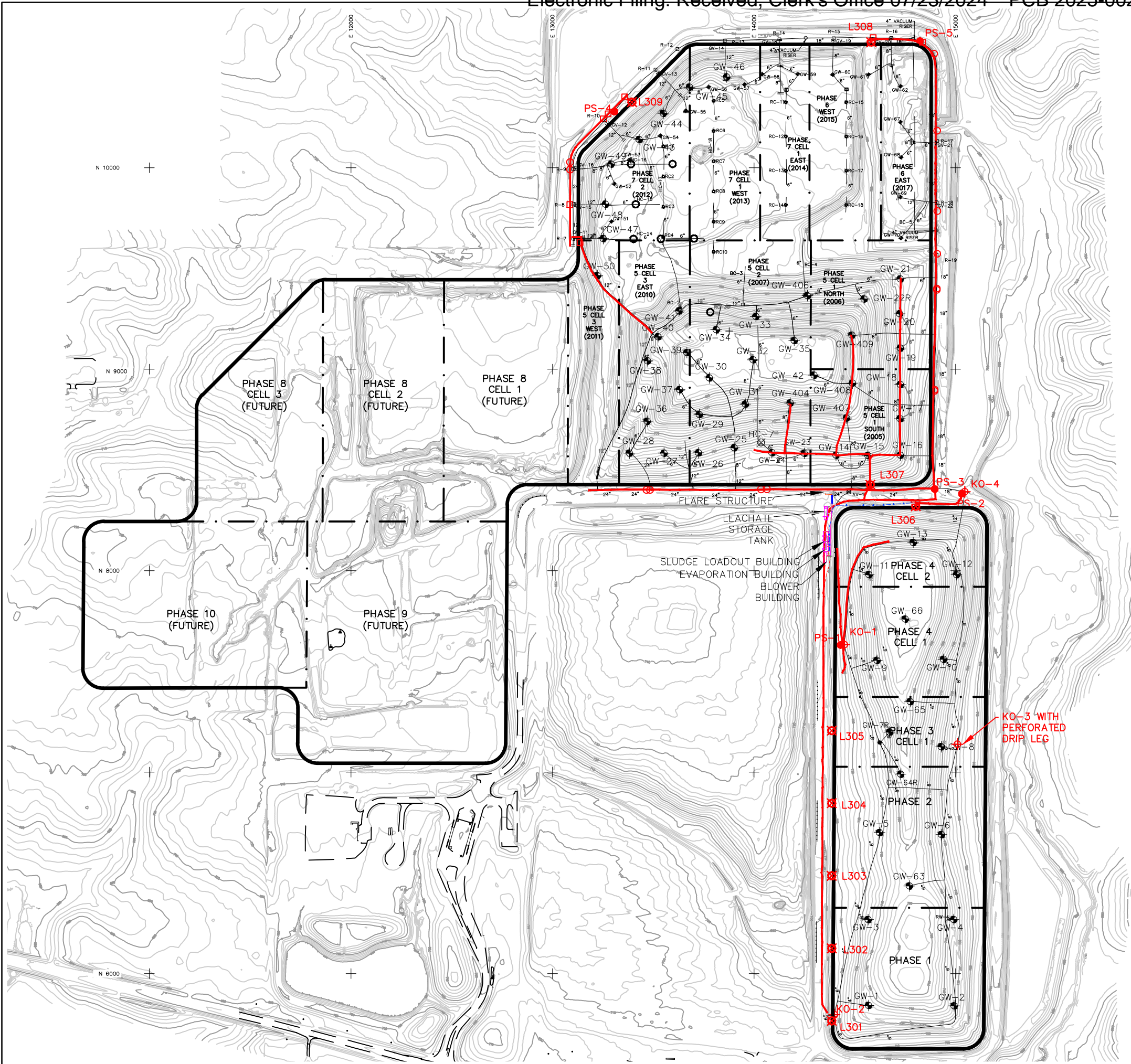
ADJOINING QUADRANGLES table



MORRISON, IL  
2021



**ATTACHMENT 2**  
**EVAPORATOR LOCATION AND LAYOUT**



**LEGEND**

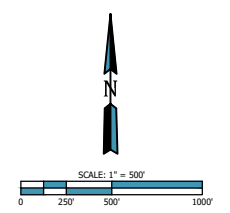
- APPROXIMATE SOLID WASTE BOUNDARY
- APPROXIMATE PHASE BOUNDARY
- 10' CONTOUR
- 2' CONTOUR
- EXISTING LFG PIPE
- EXISTING FORCEMAIN
- EXISTING CLEANOUT
- PS-1 EXISTING PUMPING STATION
- EXISTING FORCEMAIN RISER
- KO-1 EXISTING KNOCKOUT
- EXISTING ROCK COLUMN
- EXISTING GAS WELL
- EXISTING HORIZONTAL WELLHEAD
- L307 EXISTING SUMP RISER
- EXISTING ELECTRICAL UNDERGROUND
- RECORD LEACHATE FORCEMAIN PIPE
- RECORD AIRLINE PIPE
- RECORD WATERLINE PIPE
- RECORD CONCRETE PAD
- RECORD HORIZONTAL COLLECTOR WELLHEAD
- RECORD BLIND FLANGE

**NOTES:**

1. THIS DRAWING SHOWS THE EXTENT OF THE GAS MANAGEMENT SYSTEM AS OF 01/04/20.
2. CONTOURS SHOWN ARE FROM TOPOGRAPHIC BASE MAP FLOWN ON APRIL 18, 2017 BY WEAVER CONSULTANTS GROUP.

**LEACHATE STORAGE AREA**

~20,000 UNDERGROUND GAL CAPACITY  
 ~40,000 ABOVEGROUND GAL CAPACITY



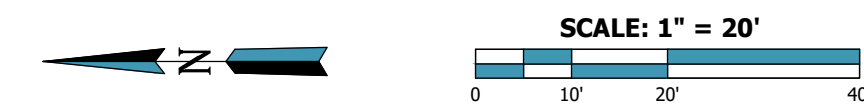
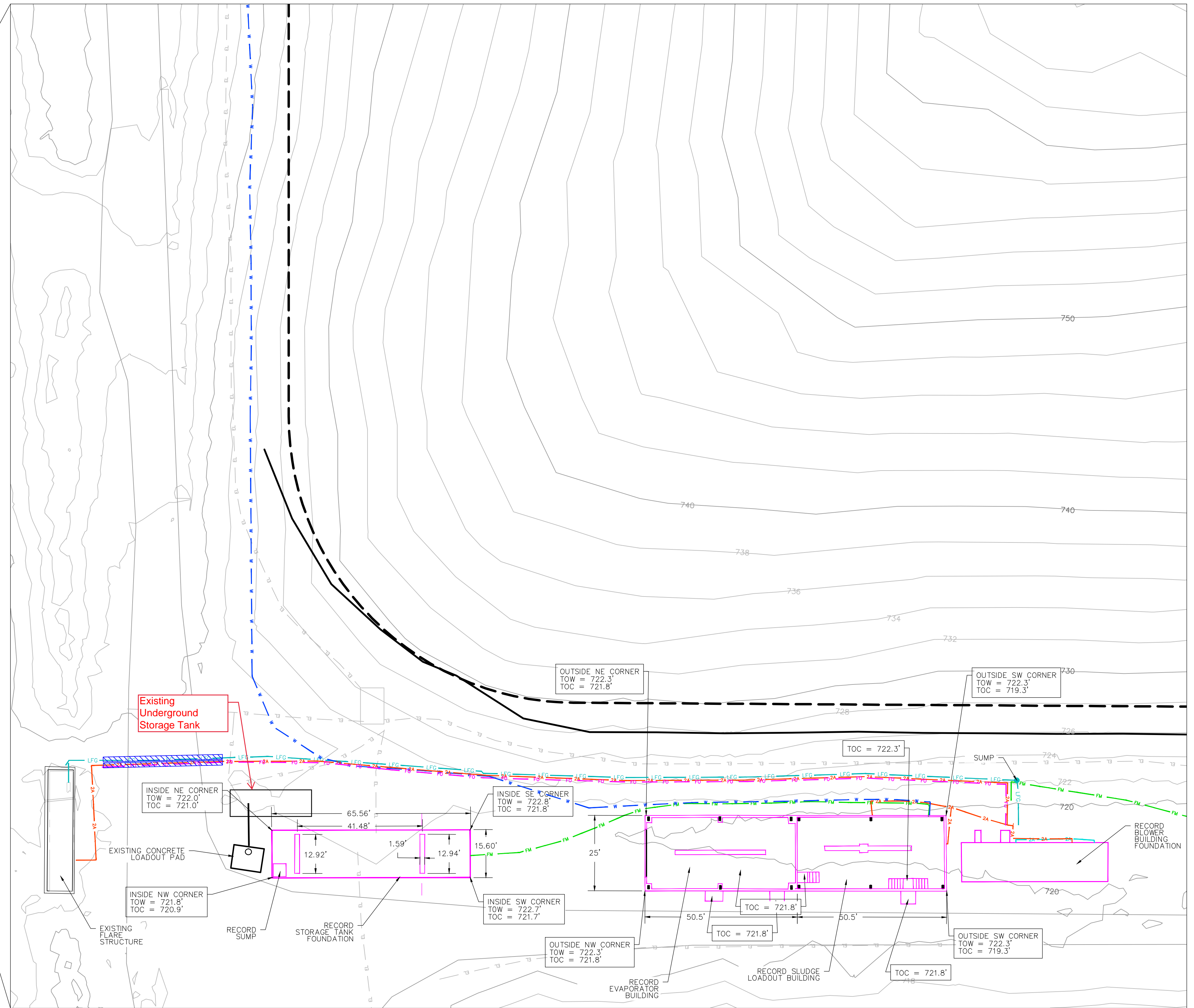
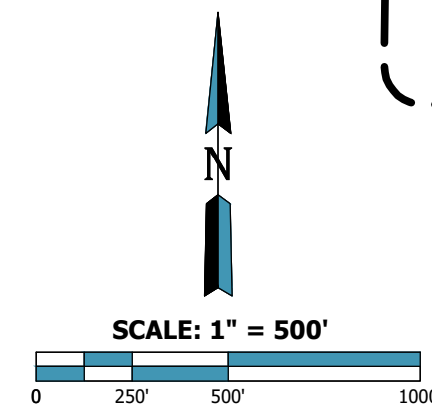
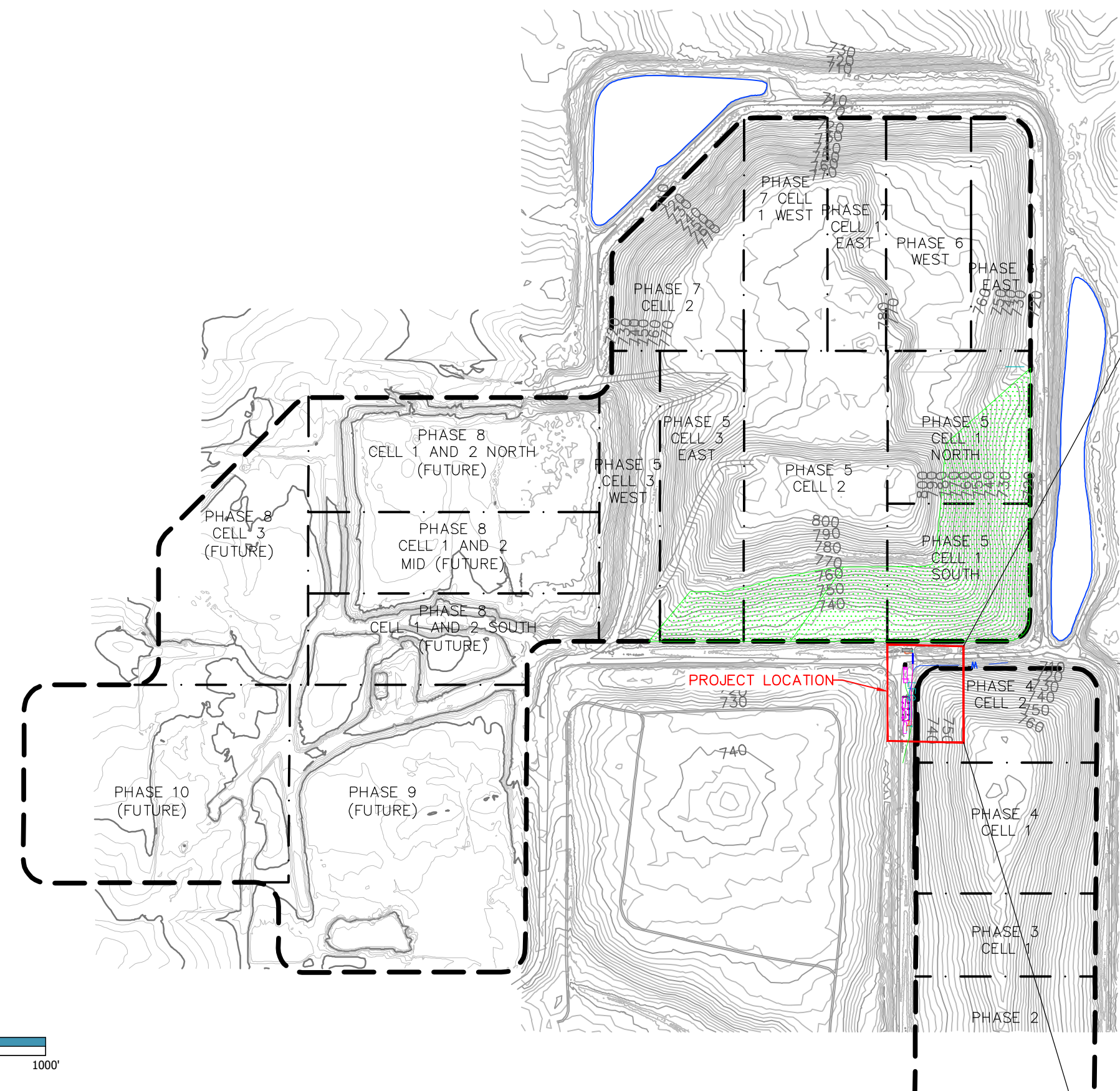
PREPARED FOR:  
**LIQUID MANAGEMENT INFRASTRUCTURE**  
 PRAIRIE HILL RDF  
 MORRISON, ILLINOIS

WEAVER CONSULTANTS GROUP  
 1346 BOND STREET SUITE 308  
 NAPERVILLE, ILLINOIS 60563  
 (630) 717-4848  
 www.wcgrp.com

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DRAWN BY: BYL  
 REVIEWED BY: CJB  
 DATE: 9/22/2023  
 FILE: 0086-006-52  
 CAD: PH001356.dwg

**SHEET 1**



KEY	
	SOLID WASTE BOUNDARY
	PHASE BOUNDARY
	EXISTING ANCHOR TRENCH
	EXISTING ELECTRICAL UNDERGROUND
	RECORD LEACHATE FORCEMAIN PIPE
	RECORD AIRLINE PIPE
	RECORD WATERLINE PIPE
	RECORD CONCRETE PAD
	RECORD SURVEY POINT

- NOTES:**
- EXISTING GRADE CONTOURS CREATED FROM FIELD SURVEYS PERFORMED BY WEAVER CONSULTANTS GROUP ON APRIL 5, 2022.
  - ELEVATIONS ARE USGS MEAN SEA LEVEL DATUM.
  - HORIZONTAL DATUM IS BASED ON ILLINOIS STATE PLANE COORDINATE SYSTEM. VERTICAL DATUM IS BASED ON USGS MEAN SEA LEVEL.
  - AS-BUILT POINTS PROVIDED BY WEAVER CONSULTANTS GROUP ON AUGUST 15, 2022 AND SEPTEMBER 9, 2022.

PREPARED FOR:

DRAFT  
 RELEASED FOR BID  
 APPROVED FOR CONSTRUCTION  
 CLIENT APPROVAL BY: \_\_\_\_\_  
 OTHER:



**PRAIRIE HILL LEACHATE EVAPORATOR**  
**LAYOUT DRAWING**  
 PRAIRIE HILL RDF  
 MORRISON, ILLINOIS

NO.	DATE	REVISION DESCRIPTION

**Weaver Consultants Group**



WEAVER CONSULTANTS GROUP  
 1318 BOND STREET, SUITE 108  
 NAPERVILLE, ILLINOIS 60563  
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DRAWN BY: **STB**  
 REVIEWED BY: **DAN**  
 DATE: **11/09/2022**  
 FILE: **0086-006-DWG**  
 CAD: **PH001311.dwg**

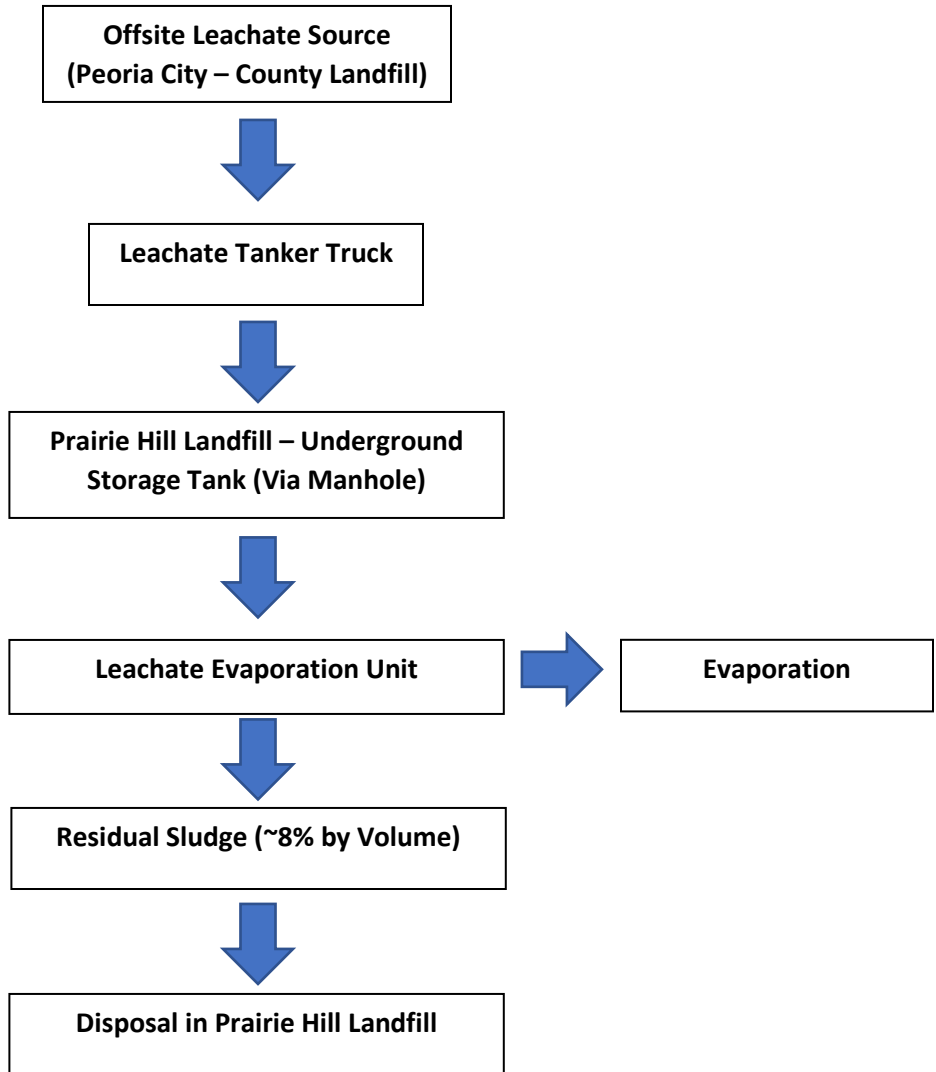
**SHEET 2**

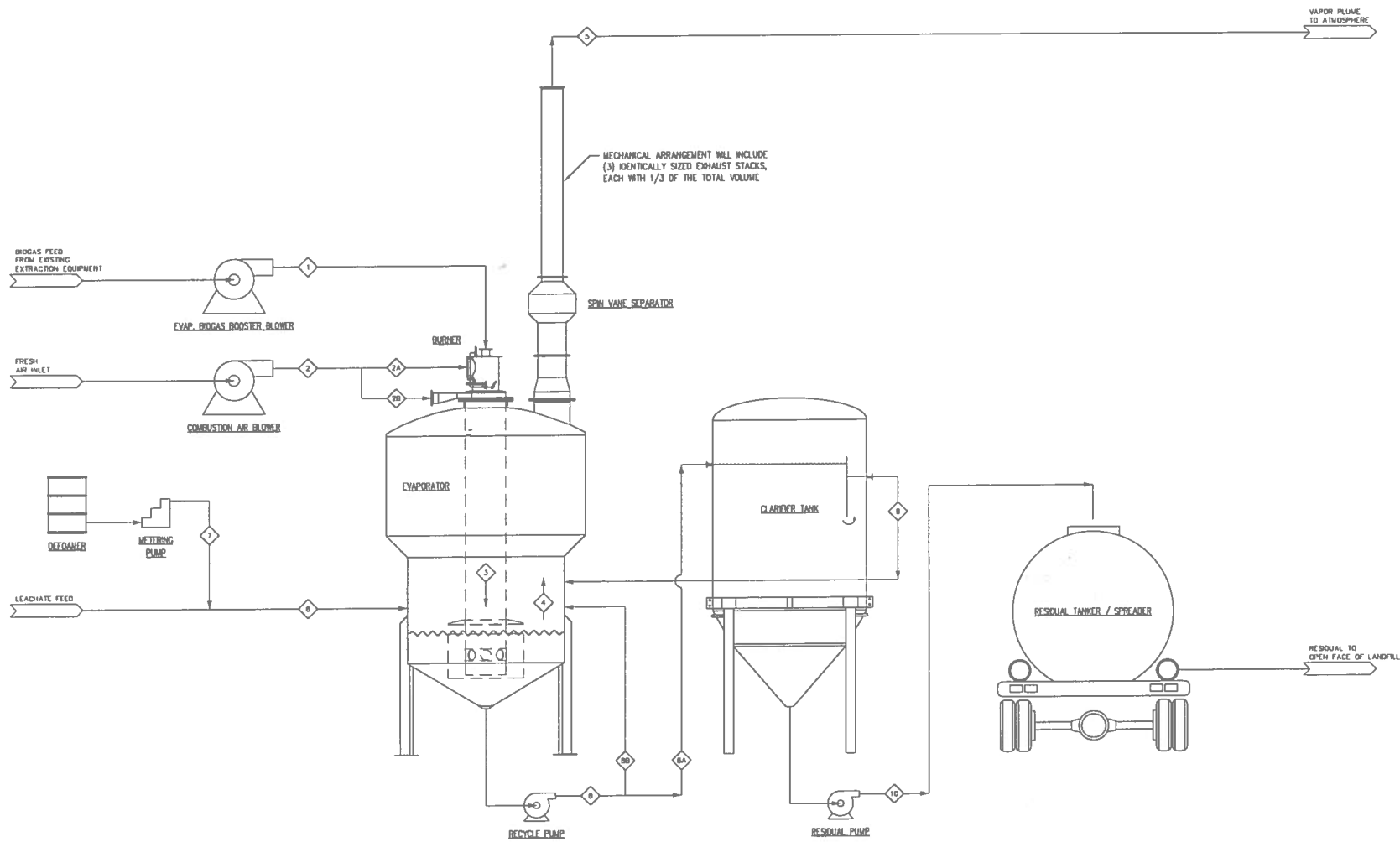


**ATTACHMENT 3**  
**PROCESS FLOW DIAGRAM**

## Process Flow Diagram

### Offsite Leachate Acceptance for Disposal in Prairie Hill Evaporator Unit





	<b>LFG Specialties</b> 16406 US ROUTE 224 E FINDLAY, OH 45840-9761 TELEPHONE: (419) 424-4999 WEBSITE: www.APTIM.com	THIS DRAWING REPRESENTS INTELLECTUAL PROPERTY OF LFG SPECIALTIES, L.L.C. ANY MODIFICATIONS TO THE ORIGINAL BY OTHER THAN LFG SPECIALTIES, L.L.C. PERSONNEL VIOLATES ITS ORIGINAL PURPOSE AND AS SUCH IS RENDERED VOID. LFG SPECIALTIES, L.L.C. WILL NOT BE HELD LIABLE FOR ANY CHANGES MADE TO THIS DOCUMENT WITHOUT THE EXPRESS WRITTEN CONSENT OF THE ORIGINATOR.	TOLERANCE:  NBS COST CODES: 1003110 - PROJECT MANAGEMENT 1003111 - MECHANICAL CAD 1003112 - PROCUREMENT 2003101 - SHOP SUPERVISION 2003785 - MECHANICAL LABOR 2003113 - MECHANICAL MATERIALS 2003920 - CARRYING FREIGHT 0003780 - STARTUP SERVICES 0003780 - CONSTRUCTION SERVICES	PROCESS FLOW DIAGRAM				PROJECT NAME LEACHATE EVAPORATOR SYSTEM 41,000 GPD	SHEET NO. P/091719
				DRAWN BY C. KOHRING	DESIGNED BY R. KECKLER	APPROVED BY R. KECKLER	DATE 12/04/12	SCALE NONE	SHEET NO. 1

**ATTACHMENT 4**  
**OPERATING LOG**

DATE	LEACHATE	EFFLUENT	EVAPORATION	LEACHATE TOTALIZER	EFFLUENT TOTALIZER	307 TOTALIZER	308 TOTALIZER	309 TOTALIZER	NOTES
9/1/2023	21134	693	20441	1811263	200549	456418	518573	366544	
9/2/2023	21162	1346	19816	1833244	200756	456418	518573	366544	
9/3/2023	0	0	0	1845163	200756	456418	518573	366544	
9/4/2023	0	0	0	1845163	200756	456418	518573	366544	
9/5/2023	0	0	0	1845921	200956	468239	522547	376061	start up at 1007
9/6/2023	10105	557	9548	1864391	201313	473399	535182	376061	
9/7/2023	21603	662	20941	1884568	201975	477735	542525	383105	
9/8/2023	21489	199	21290	1902404	202641	480718	552732	392412	loss of power shutdown at 0436/start up 1455
9/9/2023	12048	469	11435	1918182	202643	480718	552732	392412	
9/10/2023	0	0	0	1918182	202643	480718	552732	392412	
9/11/2023	0	0	0	1928039	202643	486924	557564	394847	
9/12/2023	10364	204	10160	1948068	203031	503930	562091	399881	shutdown at 1345 for monthly cleaning
9/13/2023	10229	184	10045	1948632	203031	504606	571863	408122	
9/14/2023	2235	700	1535	1950867	209008	504606	571863	408122	start up at 0938
9/15/2023	13425	0	13425	1973425	209008	511997	573382	409603	
9/16/2023	11218	0	11218	1975510	209008	511997	573382	409603	
9/17/2023	0	0	0	1975510	209008	511997	573382	409603	
9/18/2023	0	0	0	1976164	209720	522786	577692	413238	start up at 1034
9/19/2023	10823	712	10111	1994347	210100	524602	577692	413238	
9/20/2023	21715	481	21234	2012300	210201	531550	581941	413238	loss of power shutdown at 0449/start up 1455
9/21/2023	18690	6923	11767	2034255	217124	536670	584904	420370	
9/22/2023	20022	0	20022	2055418	217124	544157	592969	427512	
9/23/2023	13603	2562	11829	2082845	219435	544157	592969	427512	
9/24/2023	0	0	0	2082845	219435	544157	592969	427512	
9/25/2023	0	0	0	2082845	220135	550031	602740	441868	start up at 1255
9/26/2023	11476	1611	9865	2100655	222565	564678	602943	452742	
9/27/2023	19623	2327	17296	2123806	225222	567327	613120	452742	
9/28/2023	24052	2975	21077	2139561	227164	578650	613603	457665	shutdown at 0205 low leachate
9/29/2023	0	0	0	2139561	227164	579335	614225	457665	
9/30/2023	0	0	0	2139561	227164	579335	614225	457665	
<b>Total</b>	<b>295016</b>	<b>22605</b>	<b>273055</b>						

# **Exhibit B**



# ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276 • (217) 782-3397

JB PRITZKER, GOVERNOR

JOHN J. KIM, DIRECTOR

217/524-3301

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

JUN 18 2024

9589 0710 5270 0477 0573 37

OWNER

County of Whiteside  
Attn: Mr. Russell Renner  
200 East Knox Street  
Morrison, Illinois 61270

OPERATOR

Waste Management of Illinois, Inc.  
Attn: Mr. Joshua Hey  
18762 Lincoln Road  
Morrison, Illinois 61270

Re: 1950350014 -- Whiteside County  
Prairie Hill RDF (Leachate STPR)  
Log No. 2024-014  
Permit Storage/Treatment 807 File – 03R  
Permit Denial

Dear Mr. Renner and Mr. Hey:

This will acknowledge receipt of your permit application to accept offsite leachate from other Waste Management operated facilities for treatment in the leachate evaporator at the above-referenced solid waste management site, dated January 12, 2024 and March 19, 2024, and received by the Illinois EPA on January 17, 2024 and March 20, 2024.

Your permit application to accept leachate from other Waste Management facilities for disposal in the leachate evaporator is denied.

You have failed to provide proof that granting this permit would not result in violations of the Illinois Environmental Protection Act (Act). Section 39(a) of the Act [415 ILCS 5/39(a)] requires the Illinois EPA to provide the applicant with specific reasons for the denial of permit. The following reason(s) are given:

The Illinois Environmental Protection Act (Act), Section 3.330(b)(3) states that a new pollution control facility is “a permitted pollution control facility requesting approval to store, dispose of, transfer or incinerate, for the first time, any special or hazardous waste.” Prairie Hill Landfill is proposing using a treatment facility (leachate evaporator) that would be accepting leachate, which is a special waste, from other facilities for the first time. Therefore, proof of local siting approval for a new treatment facility, granted by the County of Whiteside, shall need to be submitted to the Illinois EPA before the leachate evaporator can be approved.

Page 2

The applicant may appeal this final decision to the Illinois Pollution Control Board pursuant to Section 40 of the Act by filing a petition for a hearing within 35 days after the date of issuance of the final decision. However, the 35-day period may be extended for a period of time not to exceed 90 days by written notice from the applicant and the Illinois EPA within the initial 35-day appeal period. If the owner or operator wishes to receive a 90-day extension, a written request that includes a statement of the date the final decision was received, along with a copy of this decision, must be sent to the Illinois EPA as soon as possible.

For information regarding the request for an extension, please contact:

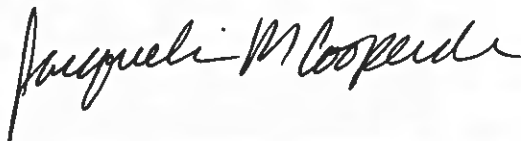
Illinois Environmental Protection Agency  
Division of Legal Counsel  
1021 North Grand Avenue East  
Post Office Box 19276  
Springfield, IL 62794-9276  
217/782-5544

For information regarding the filing of an appeal, please contact:

Illinois Pollution Control Board, Clerk  
State of Illinois Center  
100 West Randolph, Suite 11-500  
Chicago, IL 60601  
312/814-3620

Should you wish to reapply or have any questions regarding this application, please contact Carlos Khairallah at 217/557-1435.

Sincerely,



Jacqueline M. Cooperider, P.E.  
Permit Section Manager  
Bureau of Land

JMC:TWH:CGK\1950350014-STPR-2024014DEOP-2024014-Denial

cc: Joshua D. Hey, P.E. – Waste Management of Illinois, Inc.