

**BEFORE THE ILLINOIS POLLUTION CONTROL BOARD**

ILLINOIS INTERNATIONAL PORT DISTRICT,	)	
And CLEAN HARBORS SERVICES, INC.	)	
Petitioners,	)	
	)	
v.	)	PCB 26-
	)	(RCRA – Ninety Day
ILLINOIS ENVIRONMENTAL PROTECTION	)	Extension)
AGENCY,	)	
Respondent.	)	

**NOTICE**

Don Brown, Clerk  
Illinois Pollution Control Board  
60 East Van Buren St., Suite 630  
Chicago, IL 60605  
[don.brown@illinois.gov](mailto:don.brown@illinois.gov)

Illinois International Port District  
Attn: Eric Varela  
3600 E. 95<sup>th</sup> Street  
Chicago, IL 60617

Levenfeld Pearlstein, LLC  
Attn: James Brusslan, Esq.  
120 S. Riverside Plaza, Suite 1800  
Chicago, IL 60606  
[jbrusslan@lplegal.com](mailto:jbrusslan@lplegal.com)  
[jkennedy@taftlaw.com](mailto:jkennedy@taftlaw.com)

Clean Harbors Services, Inc.  
Attn: Gregory Michael  
42 Longwater Drive  
Norwell, MA 02061

PLEASE TAKE NOTICE that I have today caused to be filed a **REQUEST FOR NINETY DAY EXTENSION OF APPEAL PERIOD** with the Illinois Pollution Control Board, copies of which are served upon you.

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY



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Melanie A. Jarvis  
Deputy Chief Counsel – Land Enforcement  
P.O. Box 19276  
Springfield, Illinois 62794-9276  
217/782-5544  
[melanie.jarvis@illinois.gov](mailto:melanie.jarvis@illinois.gov)  
Dated: August 22, 2025

**THIS FILING IS SUBMITTED ON RECYCLED PAPER**

**BEFORE THE ILLINOIS POLLUTION CONTROL BOARD**

ILLINOIS INTERNATIONAL PORT DISTRICT,	)	
And CLEAN HARBORS SERVICES, INC.	)	
Petitioners,	)	
	)	
v.	)	PCB 26-
	)	(RCRA – Ninety Day
ILLINOIS ENVIRONMENTAL PROTECTION	)	Extension)
AGENCY,	)	
Respondent.	)	

**REQUEST FOR NINETY DAY EXTENSION**  
**OF APPEAL PERIOD**

NOW COMES the Respondent, the Illinois Environmental Protection Agency (“Illinois EPA”), by one of its attorneys, Melanie A. Jarvis, Assistant Counsel, and, pursuant to Section 40(a)(1) of the Illinois Environmental Protection Act (415 ILCS 5/40(a)(1)) and 35 Ill. Adm. Code 105.208, hereby requests that the Illinois Pollution Control Board (“Board”) grant an extension of the thirty-five (35) day period for petitioning for a hearing to December 4, 2025, or any other date not more than a total of one hundred twenty-five (125) days from the date of receipt of the Illinois EPA’s final decision. In support thereof, the Illinois EPA respectfully states as follows:

1. On or about August 6, 2025, the Illinois EPA issued a final decision to the Petitioner.
2. On August 22, 2025, the Petitioner made a written request to the Illinois EPA for an extension of time by which to file a petition for review, asking the Illinois EPA to join in requesting that the Board extend the thirty-five-day period for filing a petition by ninety days. Upon information and belief, Petitioner received the final decision on or about August 6, 2025.

3. The additional time requested by the parties may eliminate the need for a hearing in this matter or, in the alternative, allow the parties to identify issues and limit the scope of any hearing that may be necessary to resolve this matter.

WHEREFORE, for the reasons stated above, the parties request that the Board, in the interest of administrative and judicial economy, grant this request for a ninety-day extension of the thirty-five-day period for petitioning for a hearing.

Respectfully submitted,

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY



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Melanie A Jarvis  
Deputy Chief Counsel – Land Enforcement  
P.O. Box 19276  
Springfield, Illinois 62794-9276  
217/782-5544  
866/273-5488 (TDD)  
[melanie.jarvis@illinois.gov](mailto:melanie.jarvis@illinois.gov)  
Dated: July 1, 2025

**THIS FILING IS SUBMITTED ON RECYCLED PAPER**

**CERTIFICATE OF SERVICE**

I, the undersigned attorney at law, hereby certify that on July 1, 2025, I served true and correct copies of a **REQUEST FOR NINETY DAY EXTENSION OF APPEAL PERIOD** by the method(s) and to the persons identified below:

Electronic Service

Don Brown, Clerk  
Illinois Pollution Control Board  
60 East Van Buren St., Suite 630  
Chicago, IL 60605  
[don.brown@illinois.gov](mailto:don.brown@illinois.gov)

Levenfeld Pearlstein, LLC  
Attn: James Brusslan, Esq.  
120 S. Riverside Plaza, Suite 1800  
Chicago, IL 60606  
[jbrusslan@lplegal.com](mailto:jbrusslan@lplegal.com)  
[jkennedy@taftlaw.com](mailto:jkennedy@taftlaw.com)

US Postal Service

Illinois International Port District  
Attn: Eric Varela  
3600 E. 95<sup>th</sup> Street  
Chicago, IL 60617

Clean Harbors Services, Inc.  
Attn: Gregory Michael  
42 Longwater Drive  
Norwell, MA 02061

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY



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Melanie A. Jarvis  
Deputy Chief Counsel – Land Enforcement  
Division of Legal Counsel  
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120 S Riverside Plaza, Suite 1800  
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lplegal.com

**James D. Brusslan**  
jbrusslan@lplegal.com  
T +1 (312) 476-7570

August 22, 2025

**CERTIFIED MAIL  
RETURN RECEIPT REQUESTED**

Illinois Environmental Protection Agency  
Division of Legal Counsel  
2520 W Iles Ave  
P.O. Box 19276  
Springfield, IL 62794-5544

**Re: 0316000051-Cook County  
Clean Harbors Services  
ILD000608471  
Log No B-16R2-CA-5; CA-6; CA-8  
Permit – 24A  
Permit CA**

Dear Counsel:

We represent the Illinois International Port District (Port District) and Clean Harbors Services (Clean Harbors), the recipients of the attached August 6, 2025 letter (Letter) from Illinois EPA. Our clients received an email attaching the Letter on August 6, 2025. Pursuant to the terms of the Letter, the Port District and Clean Harbors request a 90-day extension of the 35-day appeal period to appeal the final decision in the Letter. The new requested appeal date is December 4, 2025.

Please contact the undersigned at your earliest convenience so that the parties can agree to the extension prior to the 35-day appeal period.

Sincerely,

James D. Brusslan  
Counsel for Illinois International Port District

/s/ John F. Kennedy

John F. Kennedy  
[jkennedy@taftlaw.com](mailto:jkennedy@taftlaw.com)  
Counsel for Clean Harbors Services



# ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

2520 WEST ILES AVENUE, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276 • (217) 782-3397

JB PRITZKER, GOVERNOR

JAMES JENNINGS, ACTING DIRECTOR

217-524-3301

CERTIFIED MAIL

RETURN RECEIPT REQUESTED

AUG 06 2025

9589 0710 5270 0389 7048 55

Illinois International Port District  
Erik Varela  
3600 E 95th St  
Chicago, IL 60617

Clean Harbors Services Inc  
Gregory Michael  
42 Longwater Dr  
Norwell, MA 02061

Re: 0316000051 -- Cook County  
Clean Harbors Services Inc  
ILD000608471  
Log No B-16R2-CA-5; CA-6; CA-8  
RCRA Permit – 24A  
Permit CA

Dear Erik Varela and Gregory Michael:

This letter is in response to the following submittals made to Illinois EPA to meet the corrective action requirements of the RCRA permit (Log No B-16R2) for the above-referenced facility, located at 11800 South Stony Island Avenue in Chicago, Illinois:

Submittal No. 1: A document titled, "Interim Groundwater Monitoring Plan," dated April 5, 2024, and received by Illinois EPA on April 9, 2024. It was submitted by Daniel B Stephens & Associates Inc on behalf of Illinois International Port District and Clean Harbors Services Inc and was assigned Log No B-16R2-CA-5.

Submittal No. 2: A document titled, "Supplemental Soil Investigation Work Plan", dated May 15, 2024, and received by Illinois EPA on May 20, 2024. It was submitted by Carlson Environmental on behalf of Illinois International Port District and Clean Harbors Services Inc and was assigned Log No B-16R2-CA-6.

Submittal No. 3: A draft Environmental Land Use Control (ELUC) dated May 24, 2024, and received by Illinois EPA on May 28, 2024. It was submitted by Carlson Environmental on behalf of Illinois International Port District and Clean Harbors Services Inc and assigned Log No B-16R2-CA-8.

Each submittal was sent to satisfy the requirements of Illinois EPA's letter dated January 8, 2024 (Log No B-16R2-CA-3).

2125 S. First Street, Champaign, IL 61820 (217) 278-5800  
115 S. LaSalle Street, Suite 2203, Chicago, IL 60603  
1101 Eastport Plaza Dr., Suite 100, Collinsville, IL 62234 (618) 346-5120  
9511 Harrison Street, Des Plaines, IL 60016 (847) 294-4000

595 S. State Street, Elgin, IL 60123 (847) 608-3131  
2309 W. Main Street, Suite 116, Marion, IL 62959 (618) 993-7200  
412 SW Washington Street, Suite D, Peoria, IL 61602 (309) 671-3022  
4302 N. Main Street, Rockford, IL 61103 (815) 987-7760

0316000051 – Clean Harbors Services Inc

Log No B-16R2-CA-5; CA-6; CA-8

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The currently approved corrective measures (CM) included in the facility's RCRA permit consists of an infiltration cap and a French drain system. In addition, each solid waste management unit (SWMU) requires maintenance of existing engineered barriers.

Illinois EPA did not approve the facility's previous proposal to modify the CM in its January 8, 2024, letter. Instead, the facility is required to continue with corrective actions consistent with the facility's RCRA Permit and to complete delineation of the contamination at the site.

Submittal No. 1 was sent to address the requirements of the January 8, 2024, letter to submit a revised groundwater monitoring plan and sampling/analysis plan. Submittal No. 2 was sent to address the requirements of the January 8, 2024, letter to present a plan to investigate current soil conditions and to delineate the extent of contamination at the facility. Submittal No. 3 was sent to address Condition 13 of the January 8, 2024, letter to prepare a draft ELUC for the parcels known as North Pier – 11700 South Stony Island (PIN: 25-26-600-001-8027) and South Pier – 11800 South Stony Island (PIN: 25-26-600-001-8025).

Illinois EPA reviewed the subject submittals and made the following determinations:

1. Submittal No. 1 is approved with the conditions and modifications described in Conditions 2 and 3 of this letter. Attachment A is provided to describe the currently approved Interim Groundwater Monitoring Program at the facility.
2. Once the Illinois EPA has determined soil aspects have been adequately investigated to determine the steps for closure of the investigative areas, as required by Conditions 4 through 10 of this letter, a permanent groundwater program must be proposed if 35 IAC Part 742 will not be used for closure of groundwater. A report for Illinois EPA review and approval to establish the permanent program must be submitted in the form of a corrective action modification and must include but not be limited to:
  - a. Rationale and goals of the proposed Groundwater Monitoring Program;
  - b. A discussion of geology and hydrogeology of the proposed Groundwater Monitoring Plan areas sampled;
  - c. A discussion of all field activities conducted;
  - d. Description of the procedures utilized for sample collection, handling, and analysis;
  - e. Copies of all data collected during the quarterly sampling events;
  - f. Tabular summary of all analytical data;
  - g. Groundwater flow information including water level measurements in tabular and potentiometric map form;

- h. A discussion of the collected data;
  - i. A discussion of the nature and extent of facility related impacts to groundwater quality beneath the Interim Groundwater Monitoring Plan area based on the results of groundwater monitoring;
  - j. Conclusions and proposed course of action based on the results of available groundwater monitoring, including any necessary corrective action.
- 3. Submittal No. 2 is approved with the conditions and modifications described in Conditions 4 through 10 of this letter.
- 4. All samples must be analyzed for volatile organic compounds, semi-volatile organic compounds, total metals, pH, cyanide, and the constituents listed in 35 IAC 721.124, as described in Submittal No. 2.
- 5. Submittal No. 2 includes figures to demonstrate that a hardpan layer exists under S-SWMU-7. Three borings were extended past the hardpan layer in 2020, and significant levels of contamination were not detected. However, information from only three borings is insufficient to demonstrate that the hardpan layer is impeding migration of constituents across the entire SWMU; therefore, unless additional information is provided to demonstrate that the hardpan layer is effective in preventing downward migration, the facility must proceed with vertical delineation of the area.
- 6. Submittal No. 2 states that several of the proposed borings are intended to replicate historical exceedances at the site. If the exceedance still exists, a separate work plan will be submitted for delineation of those borings. Illinois EPA agrees that replicating historical exceedances is necessary given the time that has passed since they were last examined. In addition, Illinois EPA agrees that delineation of those borings should occur after the current conditions are verified. However, it is essential that a complete understanding of the current conditions is obtained; therefore, for each boring intended to replicate historical sampling locations, the facility must expand the intervals to be sampled and analyzed. Specifically, borings B-2001 to B-2028 must have one sample analyzed from the surface soil (0 to 3 feet) and additional samples collected and analyzed from every subsequent interval until the boring terminates or until contact with groundwater. The surface soil sample depth and sampling interval should be chosen and adjusted as needed to include the specific intervals listed in Submittal No. 2 for each boring.
- 7. Submittal No. 2 states that the former impoundments are under a Detection Monitoring Program. The RCRA Permit states the impoundments are under a Compliance Monitoring Program. Please review the RCRA Permit for the specific responsibilities associated with the Compliance Monitoring Program to ensure they are being met.



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8. Quality assurance/quality control procedures which meet the requirements of SW-846: Test Methods for Evaluating Solid Wastes must be implemented during all required sampling/analysis efforts. In addition, sample collection, handling, preservation, preparation, and analysis must be conducted in accordance with the procedures set forth in SW-846 and the requirements set forth in this letter.
9. The facility must initiate the investigations described in Submittal No. 2 within 60 days of the date of this letter. The facility must submit a report detailing the results of this investigation within 90 days of receipt of the last laboratory report associated with the proposed investigation. The report must include the following:
  - a. background information about the facility and the rationale behind the soil investigation;
  - b. drawings showing the horizontal and vertical boundaries of the contaminant plume(s) existing at the site;
  - c. documentation of the results of all sampling and analysis efforts including:
    - i. a summary of all analytical data;
    - ii. drawings showing the location where soil samples were collected;
    - iii. the depth and vertical interval from which each sample was collected;
    - iv. a description of the soil sampling procedures and chain of custody procedures;
    - v. identification of the test methods used and detection limits;
    - vi. copies of the final laboratory report sheets, including quality assurance/quality control data;
    - vii. visual classification of each soil sample according to ASTM D-2488;
    - viii. a discussion of the data and how it relates to the overall goals of the facility; and
    - ix. photo documentation of the investigation.
10. Condition 7 of Illinois EPA's January 8, 2024, letter required a plan to remediate the characteristically hazardous soils at the site. In addition, Submittal No. 2 states that a work plan will be submitted to delineate exceedances detected during the proposed soil investigation. The facility must submit these plans with the report described in Condition 9 of this letter.

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11. Submittal No. 3 cannot be approved at this time for the following reasons:
  - a. In accordance with 35 IAC 742.1010, scaled maps showing the following items must be included as part of a draft ELUC submittal: the nature, source, and direction of movement of the contaminants of concern; the horizontal and vertical extent of soil containing contaminants of concern; and the location and boundaries of any engineered barriers. These maps are not included in Submittal No. 3.
  - b. In “Addendum to Corrective Measures Phase II,” dated March 8, 2023 (Log No B-16R2-CA-3), the facility stated that all currently existing buildings will be demolished, and any future building will require a building control technology to address the indoor inhalation exposure route. However, the requirement for building control technologies for any newly constructed buildings is not present in the draft ELUC, as required by 35 IAC 742.312, 742.1000, and 742.1200.
  - c. Illinois EPA acknowledges that the facility has submitted the draft ELUC as required in Condition 13 of Illinois EPA’s January 8, 2024, letter. However, considering that delineation of the contamination is necessary, and that appropriate CM have not yet been implemented, Illinois EPA has determined that it is premature to establish an ELUC.
  - d. An ELUC developed in accordance with 35 IAC Part 742 would not be able to place the necessary restrictions on the hazardous waste management units closed as landfills and currently under post-closure care; therefore, to include those units, it will be necessary to develop an Environmental Covenant in accordance with the Uniform Environmental Covenants Act (765 Illinois Compiled Statutes 122). Illinois EPA will inform the facility when it is appropriate to develop the Environmental Covenant.
  - e. Until such time that the appropriate institutional controls are established at the facility, the Tier 2 groundwater remediation objectives developed after the Tier 2 groundwater demonstration (Log No B-16R-CA-10) cannot be utilized.
12. A completed Illinois EPA RCRA Corrective Action Certification form (LPC-632) must accompany all corrective action information submitted to Illinois EPA. The form can be found on Illinois EPA’s website.
13. Under 29 CFR 1910, cleanup operations must meet the applicable requirements of OSHA’s Hazardous Waste Operations and Emergency Response standard. These requirements include hazard communication, medical surveillance, health and safety programs, air monitoring, decontamination, and training. General site workers engaged in activities that expose or potentially expose them to hazardous substances must receive a minimum of 40 hours of safety and health training off site plus a minimum of three days of actual field experience under the direct supervision of a trained, experienced

0316000051 – Clean Harbors Services Inc  
Log No B-16R2-CA-5; CA-6; CA-8  
Page 6

supervisor. Managers and supervisors at the cleanup site must have at least and additional eight hours of specialized training on managing hazardous waste operations.

14. All waste generated as part of this project must be managed in accordance with the requirements of 35 IAC Parts 721, 722, 723, 728, 808, and 809.

This letter will constitute Illinois EPA's final decision on the subject submittals. The applicant may appeal this final decision to the Illinois Pollution Control Board in accordance with 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 not to exceed 90 days by written notice from the applicant and 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 Illinois EPA as soon as possible.

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

Illinois Environmental Protection Agency  
Division of Legal Counsel  
2520 W Iles Ave  
P.O. Box 19276  
Springfield, IL 62794-9276  
217-782-5544


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

Illinois Pollution Control Board  
60 E Van Buren St, Suite 630  
Chicago, IL 60605-1241  
312-814-3620

Work required by this letter, submittal, 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 letter 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. Illinois EPA may refer any discovered violation of these laws to the appropriate regulating authority.

Sincerely,

Sincerely,



Joshua L. Rhoaden, PG

**Attachments:** A – Interim Groundwater Monitoring Program  
B – Proposed Soil Boring Locations

JLR:BF:0316000051-RCRA-B16R2CA5-B16R2CA6-B16R2CA8-Approval.docx

BR TVH GKO AMB

cc: Scott McSorley – Carlson Environmental  
Marie Mueller – Carlson Environmental



Attachment A  
Interim Groundwater Monitoring Program

1. The facility must implement an Interim Groundwater Monitoring Program on the groundwater beneath Clean Harbors Chicago Services, Inc. at 11800 South Stony Island Avenue, Chicago, Illinois. The purpose of the monitoring program is to monitor the current conditions at the facility and to inform the development of a long-term program, if needed, while certain corrective action aspects are being completed.
2. The following 18 wells must be sampled:

G-307S	G-334S	G-343S
G-347	G-117A	MW-7
MW-6	MW-101	MW-5
G-344	G-332	G-348
MW-8	WP-6	MW-104
G-314	G-342	G-330

The locations of these wells are specified in the Interim Groundwater Monitoring Plan (Log No. B-16R2-CA-5).

3. Construction of each monitoring well must be in accordance with the "Monitoring Well Diagram" and "Well Completion Report" forms located on Illinois EPA's website, unless otherwise approved in writing by Illinois EPA. All new monitoring wells/piezometers to be installed must be continuously sampled and logged on Illinois EPA boring logs contained in the "Field Boring Log" form on Illinois EPA's website, unless otherwise approved by Illinois EPA.
4. Written approval from Illinois EPA must be obtained prior to changes being made to the facility's Interim Groundwater Monitoring Program. The facility must submit a proposal for the installation and addition, or replacement, or for the removal, of any monitoring well.
5. The facility must notify Illinois EPA within 30 days in writing if any of the wells identified in Condition 2 are damaged or the structural integrity has been compromised. A proposal for the replacement of the subject well must accompany this notification. The well must not be plugged until the new well is on-line and monitoring data has been obtained and verified unless the well is extremely damaged and would create a potential route for groundwater contamination. Prior to replacing the subject well, the facility must obtain written approval from Illinois EPA regarding the proposed installation procedures and construction.
6. Should any well become consistently dry or unserviceable; a replacement well must be provided within 10 feet of the existing well. This well must monitor the same geologic zone as the existing well and be constructed in accordance with the current Illinois EPA groundwater monitoring well construction standards at the time that the well is replaced.

A well which is more than 10 feet from the existing well or does not monitor the same geologic zone must be approved by Illinois EPA and designated a new well.

7. The facility must submit boring logs, construction diagrams and data sheets from the installation and development of a new or replacement well to Illinois EPA at the following address within 30 days of the date that installation of the well is completed. In addition, the facility must submit certification that plugging and abandonment of a well was carried out in accordance with 77 IAC Part 920 regulations and the approved procedures to Illinois EPA at the following address within 30 days of the date that the well is plugged and abandoned. All information should be submitted to the appropriate State Agencies.

Illinois Environmental Protection Agency  
Bureau of Land - #33  
Permit Section  
2520 West Iles Avenue  
P.O. Box 19276  
Springfield, Illinois 62794-9276

8. All wells must be clearly identified and must be equipped with protective caps and locks. Monitoring wells located in high traffic areas must be protected with bumper guards.
9. All groundwater monitoring wells not utilized in the approved groundwater monitoring system, but retained by the facility, must be constructed and maintained in accordance with 77 IAC Part 920 regulations. Monitoring wells and piezometers that are improperly constructed must be abandoned in accordance with Condition 7.
10. The facility must determine groundwater quality and must be analyzed for the constituents of potential concern as described in Condition 11 and field parameters at the groundwater monitoring wells described in Condition 2 on a quarterly basis. Groundwater sampled from Interim Groundwater Monitoring Program wells must be compared to Class II Groundwater Quality Standards (GQSs) in 35 IAC 620.420. Total (unfiltered) values must be used for comparison with GQS. Field parameters are listed below:

Field Parameters	Reporting Units
pH	
Specific Conductance	micromhos/cm
Temperature of Water Sample	°F
Turbidity	Ntus
Depth to Water (below land surface)	Feet
Depth to Water (below measuring point)	Feet
Elevation of Bottom of Well #	Ft-MSL
Elevation of Groundwater Surface	Ft-MSL
Elevation of Measuring Point (top of casing) ##	Ft-MSL

Note: # must be determined during the fourth sampling event of each year.  
 ## must be surveyed during the fourth sampling event every two years, or at the request of Illinois EPA, or whenever the elevation changes as required by Condition 15.

11. The Interim Groundwater Monitoring Program must conduct quarterly sampling for the first year of the program. Those constituents which are not detected during all four events may be removed from the constituent list provided in Table 1, "Water Quality Constituents of Potential Concern, Clean Harbors Services, Inc. Chicago Facility", of the Interim Groundwater Monitoring Plan (Log No. B-16R2-CA-5) following the fourth sampling event. After this, the facility may utilize the revised constituent list and continue to sample groundwater quarterly until such time as a final program is established for the areas being investigated, or the areas are closed in accordance with 35 IAC Part 742.
  - a. "Detected" is defined as a concentration equal to or above the Lower Limit of Quantitation (LLOQ) for the latest promulgated version of USEPA's "Test Methods for Evaluating Solid Wastes, Physical/Chemical Methods," Third Edition (SW-846) and finalized updates for the applicable analytical methods specified in the approved Interim Groundwater Monitoring Plan, which should not exceed the applicable 35 IAC 620.420 Class II GQSs.
  - b. Following establishment of the revised constituent list the groundwater monitoring report required by Condition 16 must include a description of constituents removed from the interim constituent list and the new revised constituent list
12. The facility must determine the groundwater flow rate and direction in the uppermost aquifer at least annually, and report this data to Illinois EPA at least annually, from the monitoring wells identified in Condition 2.
13. The facility must determine the groundwater surface elevation referenced to mean sea level (MSL) at each well each time groundwater is sampled.



14. The facility must determine the surveyed elevation of “stick-up” referenced to MSL when the well is installed (with as-built diagrams) and every two years or at the request of Illinois EPA, or whenever the elevation changes. “Stick-up” refers to the height of the referenced survey datum. This point is determined within + 0.01 foot in relation to mean seal level, which in turn is established by referenced to an established National Geodetic Vertical Datum.
15. Elevation, as referenced to MSL, of the bottom of each monitoring well (STORET 72020), is to be reported at least annually. The mandatory measurement must be taken during the fourth quarterly sampling event of each year.
16. Samples collected to meet the requirements of the Interim Groundwater Monitoring Program must be collected and reported as identified in the following table. All additional information required by the groundwater monitoring program (as specified in Conditions 10, 12, 13, 14, 15) must also be submitted to Illinois EPA at the address listed in Condition 7 in accordance with this schedule:

<b><u>Sampling Event Of Calendar Year</u></b>	<b><u>Samples To Be Collected During The Months Of</u></b>	<b><u>Results Submitted To The Agency By The Following</u></b>
First Quarter	January – February	March 15
Second Quarter	April – May	June 15
Third Quarter	July – August	September 15
Fourth Quarter	October – November	January 15

17. Report all information to Illinois EPA in a form which can be easily reviewed. All submittals must contain tables of data drawings and text (as necessary) to accurately describe the information contained in the submittal.
18. Submit a completed “RCRA Facility Groundwater, Leachate and Gas Reporting Form” (LPC 592) as a cover sheet for any notices or reports required by the facility’s Interim Groundwater Monitoring Program for identification purposes. Only one copy of the LPC 592 with wet signatures must accompany your submittal. However, the facility must submit one original paper copy with wet signatures (including the groundwater monitoring laboratory results) and a minimum of two additional copies for all reports and notifications to be submitted electronically to Illinois EPA Permit Section and Field Operations Section (FOS). Current staff with the respective Illinois EPA offices include Gabriel.Kammel-Odonnell@illinois.gov (Permit Section) and Anthony.Guido@illinois.gov (FOS). Additional paper and electronic copies must be provided upon Illinois EPA request.

# Attachment B Proposed Soil Boring Locations

