

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

**RECEIVED**  
CLERK'S OFFICE

JUN 09 2005

IN THE MATTER OF )  
)  
PETITION OF WASTE MANAGEMENT OF )  
ILLINOIS, INC. FOR AN ADJUSTED )  
STANDARD FROM SUBPART D OF )  
35 ILL. ADM. CODE 721 AND FOR RCRA )  
WASTE DELISTING UNDER 35 ILL. ADM. )  
CODE 720.122 FOR TREATMENT RESIDUAL )  
OF CID RECYCLING AND DISPOSAL )  
FACILITY BIOLOGICAL LIQUID )  
TREATMENT CENTER )

AS 05-07  
(Adjusted Standard - Land)

STATE OF ILLINOIS  
Pollution Control Board

**NOTICE OF FILING**

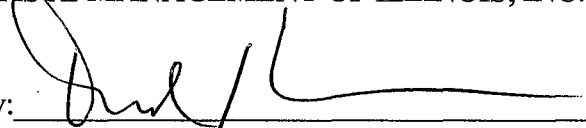
TO: USEPA  
Office of Solid Waste and  
Emergency Response  
1200 Pennsylvania Avenue, N.W.  
Washington, D.C. 20460

USEPA, Region 5  
77 West Jackson Boulevard  
Chicago, Illinois 60604

Division of Legal Counsel  
Illinois Environmental Protection Agency  
1021 North Grand Avenue East  
P.O. Box 19276  
Springfield, Illinois 62794-9276

PLEASE TAKE NOTICE that on June 9, 2005, we filed with the Illinois Pollution Control Board, an original and four copies of the attached Waste Management of Illinois, Inc.'s Motion for Expedited Review.

WASTE MANAGEMENT OF ILLINOIS, INC.

By:   
One of Its Attorneys

Donald J. Moran  
PEDERSEN & HOUP  
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(312) 641-6888  
Attorney Registration No. 1953923

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**MOTION FOR EXPEDITED REVIEW**

Waste Management of Illinois, Inc. ("WMII"), by its attorneys Pedersen & Houpt, P.C. and pursuant to 35 Ill. Adm. Code 101.512, requests that the Board expedite its review and determination of the petition for adjusted standard. In support of this motion, WMII states as follows:

1. As set forth in the RCRA Delisting Adjusted Standard Petition, WMII seeks a Resource Conservation and Recovery Act ("RCRA") hazardous waste delisting for the lime-conditioned filter cake generated from the treatment of hazardous and non-hazardous leachate and wastewater ("petitioned waste"), at the CID Recycling and Disposal Facility in Calumet City, Illinois ("CID"). The petitioned waste is disposed in Area 4, an on-site RCRA Subtitle C landfill unit. As such, the costs of managing the petitioned waste have been reasonable.

2. To permit continued on-site management of the petitioned waste, WMII has limited the amount of off-site waste received in Area 4. The cost to maintain Area 4 with a minimal amount of waste being disposed continues to be incurred.

3. Expedited review and determination of the petition will likely allow efficient and final closure of Area 4, thereby reducing costs to CID and the regulatory agencies associated

with the continuing maintenance and oversight of this RCRA Subtitle C landfill. This would also facilitate installation of the synthetic cap on Area 4 within a shorter time frame, thereby reducing the potential for any effects on human health or the environment.

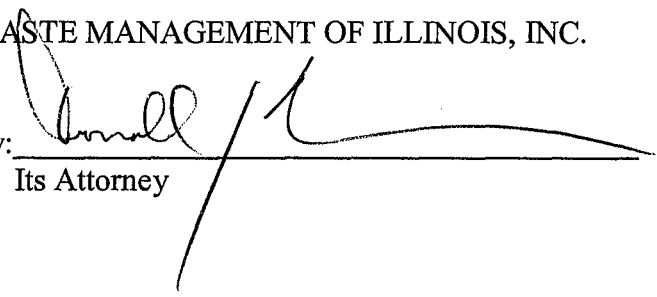
4. In the event Area 4 is filled prior to a final decision in this matter, the petitioned waste must be sent off-site to a permitted RCRA Subtitle C landfill. The additional costs to transport and dispose the petitioned waste at an off-site RCRA Subtitle C landfill would be substantial. These costs would be incurred both by WMII and CID customers. With the increased cost of disposal, CID customers may select less efficient or appropriate options for managing their waste.

5. Expediting review and determination of the petition will (a) allow the existing RCRA Subtitle C landfill unit to be closed in a timely and effective manner, (b) ensure the proper and efficient management of the petitioned waste, (c) save unnecessary cost and expense to both CID and the regulatory agencies, and (d) maintain disposal options for waste generators.

WHEREFORE, WMII requests that the Board grant this motion, expedite review of the Petition, and provide such further relief as the Board deems appropriate.

Respectfully submitted,

WASTE MANAGEMENT OF ILLINOIS, INC.

By:   
Its Attorney

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