American Bottom Conservancy
P.O. Box 4242, Fairview Heights, IL 62208
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September 13, 2007

John Therriault, Deputy Clerk
Illinois Pollution Control Board
James R. Thompson Center
100 W. Randolph
Suite 11-500
Chicago, IL 60601

pc#25

Re: PCB 2007-084 North Milam

American Bottom Conservancy submits this public comment on behalf of its members living in Illinois, especially those living in the American Bottom floodplain of the Mississippi River, where Waste Management is proposing to locate its North Milam landfill.

On August 15, 2007, the U.S. Army Corps of Engineers (USACE) and the Federal Emergency Management Agency (FEMA) held a Levee Summit at Alton to report important findings with regard to Metro East Corps levees in place to protect the floodplain from the Mississippi River. They reported that our levees, from Prairie du Pont (south of East St. Louis) north to Alton, lack structural integrity, especially with regard to under-seepage during floods.

During the 1993 flood, I lived very near the Metro East levee at Granite City, where sand boils developed. Officials checked the levee several times a day. We were told the levee could go at any moment. I drove around with a U-Haul filled with possessions for days before the levee downstream at Valmeyer broke, relieving the pressure on our levee. Although the Corps has done some rehabilitation of the levees, Corps officials report that there is still under-seepage and the area is vulnerable to flooding.

At the August 15 meeting, FEMA indicated that residents and businesses located in the floodplain would be required to obtain flood insurance.

This is the same floodplain where Waste Management proposes to construct yet another new landfill. If it is constructed and floods, it would be a disaster. Municipal waste contains many toxins and poisons. In addition, North Milam proposes to take in special wastes, including industrial sludges, which could end up in floodwater.

Landfills do not belong in the floodplain. Waste Management's expert said there is no base flood elevation at the site, but no one disputes its location. It is located on the Cahokia Canal; it would be constructed within a few feet of the groundwater level. When the river rises, so does the groundwater. In 1993 the river was within one or two feet of the top of our levee. In 1995, we had severe interior flooding. Both times we were declared a federal disaster area. We urge the Board to take that into consideration.

We direct you to the USACE website, which has much information on the findings by the Corps and FEMA presented at the levee summit.

http://www.mvs.usace.army.mil/pa/levee-summit-pres.html

At the left of the page, there are links to maps and handouts, and links in the center of the page to presentations. We are enclosing several of the documents and are having color copies sent separately.

Although the Levee Summit was held and the reports released after the siting hearing, we believe they are of such importance and relevance that the Board should consider them as it weighs its decision on whether Waste Management meets the siting criteria and whether this landfill should be allowed to be constructed in the floodplain.

We also direct the Board's attention to ABC-Sierra Club Comment 2 to the City of Madison (C2097-2122), dated January 20, 2007, on the Madison County Soil Survey, which clearly shows the site to be in the floodplain and shows that the soils on the site are unsuitable for use by a landfill. The soils have severe restrictions against siting an area sanitary landfill because of wetness, seepage or ponding. One soil type is listed as associated with flooding.

Thank you for your consideration of our comments.

Sincerely,

Kathy Andria
President

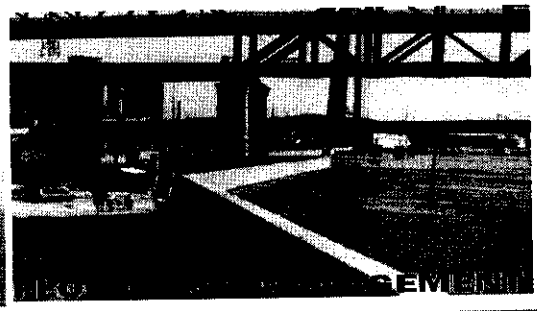
St. Louis District Flood Risk Management
http://www.mvs.usace.army.mil/pa/floodriskmang.html

Metro East Levees
http://www.mvs.usace.army.mil/pa/levee-summit-pres.html

Illinois Levee Summit—August 15, 2007
Levee Status Handout
http://www.mvs.usace.army.mil/pa/leveesummit-hand/Illinois%20Levee%20Summit%20-%20Handout.pdf

Encs.

US Army Corps of Engineers®
St. Louis District



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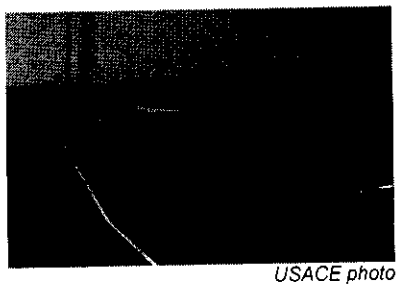
Overview

The St. Louis District's flood risk management system is comprised of three major components: urban levees or floodwalls, agricultural levees and multi-purpose reservoirs. When performance of a flood damage reduction system is evaluated, all components must be considered and evaluated as a whole system and not as separate features. As a Federal leader in Flood Risk Management, it is our vision to provide and sustain a comprehensive flood risk reduction system within the St. Louis District watershed boundaries that reliably minimizes risk to lives and property damage.

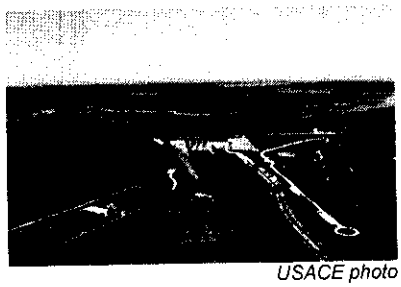


USACE photo

The Prairie Du Rocher Levee in Illinois protects 13,000 acres along the Mississippi River.

Urban levees are built very high to protect cities and towns against floods of great magnitude. Agricultural levees are smaller levees that provide relatively lower levels of protection to millions of acres of cropland against more frequent, less severe floods. Multi-purpose reservoirs provide flood storage capacity and support other Corps' missions, such as water supply, hydropower, environmental stewardship and recreation.

Levees fall within three categories: Federal, non-federal and private. There are over 700 miles of levees within the boundaries of the St. Louis District. Forty seven of them are federal levees and 42 are non-federal, protecting 578,365 acres. Since 1960 the system has prevented more than $11 billion in damages within the St. Louis District.



USACE photo

Army Corps of Engineers multi-purpose reservoirs are an important part of the flood damage reduction system. During the Flood of 1993, the water held back by Army Corps reservoirs decreased the crest in St. Louis by four feet.

Federal levees are built by the Corps and then turned over to the customer (city, county, levee district) for operation and maintenance. One exception in the St. Louis District is the Chain of Rocks Levee, which is operated and maintained by the Army Corps of Engineers.

Non-federal levees are built by public entities or are publicly sponsored. In order to qualify for federal assistance following a flood event, these privately-funded levees must be built to Corps standards and pass annual inspections. Private levees, built by private concerns, are typically built to a lower level of protection than Corps standards, although some private levees may meet or exceed Corps standards. If an eligibility inspection is requested and passed, private levees can be eligible for federal funding to help recover from damages.

US Army Corps of Engineers ®
St. Louis District

Illinois Levee Summit
August 15, 2007

Wood River Drainage and Levee District

Authorized level of protection: 500 year
Length: 20.8 miles
Protects: 13,700 acres, urban residential, refinery and chemical manufacturing area
Concern: Inadequate seepage controls and deteriorating corrugated metal pipes (CMP).
Status:

- Reevaluation Report examining underseepage issues approved and funding requested
- Continuing design work for first contract (portion of relief wells)
- Funding required to start construction
- Remaining reconstruction features are pending approval

Solution:

- Approved work includes replacing existing relief wells and installing new relief wells
- Recommend reconstruction or replacement of various components of closure structures, gravity drains and pump stations (this work is pending authorization)

E. St. Louis Drainage and Levee District

Authorized level of protection: 500 year
Length: 19.8 miles (includes Chain of Rocks Canal East Levee)
Protects: 61,645 acres, 250,000 residents, $1 billion in economic value
Concern: Inadequate seepage controls and deteriorating corrugated metal pipes (CMP), pump stations and closure structures.
Status:

- Ongoing rehabilitation of system infrastructure is 93 percent complete
- Sponsor's funding in place for authorized work
- Addressing underseepage requires additional study and authorization
- General Design Memorandum Supplement – pending completion

Solution:

- Ongoing work includes rehabilitation of gravity drains, closure structures, relief wells, pumping stations, and closure structures
- Solutions for underseepage requires additional study

Chain of Rocks Canal East Levee

Authorized level of protection: 500 year
Length: 19.8 miles (includes E. St. Louis Drainage and Levee District - MESD)
Protects: 61,645 acres, 250,000 residents, $1 billion in economic value
Concern: Inadequate seepage controls.
Status:

- Chain of Rocks Canal Design Deficiency Report is approved
- Funding requested
- Under construction – approximately 35 percent complete

Solution:

- Installation of new relief wells; construction of levee berms and a pump station

Prairie Du Pont Levee & Sanitary District

Authorized level of protection: 500 year
Length: 10.3 miles
Protects: 9,560 acres
Concern: Inadequate seepage controls and deteriorating corrugated metal pipes (CMP).
Status:

- Reconnaissance Report identified design deficiencies and reconstruction needs
- Recommended follow-on investigation
- Awaiting funds to begin study

Solution:

- Still to be determined but will likely include the rehabilitation and replacement of existing relief wells and possibly the construction of additional relief wells, and rehabilitation of some corrugated metal pipes.

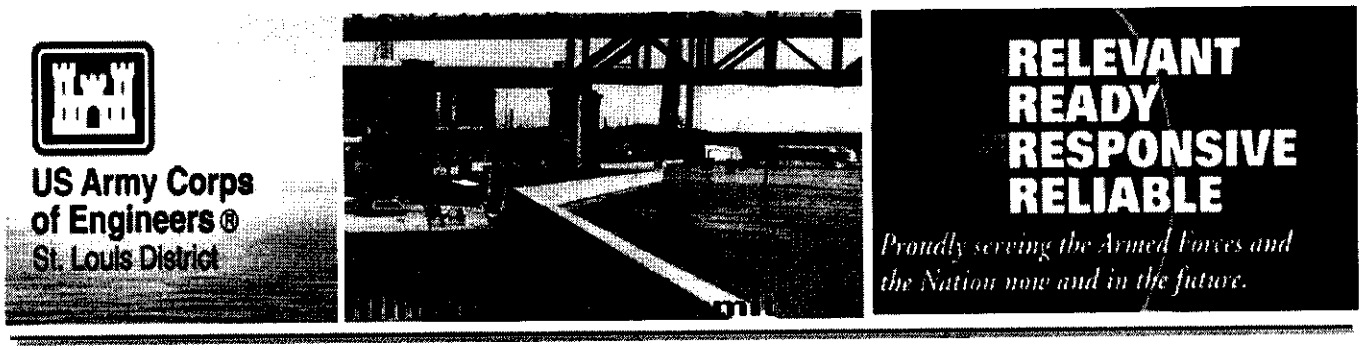
Fish Lake Drainage & Levee District

Authorized level of protection: 500 year
Length: 4.9 miles
Protects: 2,440 acres
Concern: Inadequate seepage controls and deteriorating corrugated metal pipes (CMP).
Status:

- Reconnaissance Report identified design deficiencies and reconstruction needs
- Recommended follow-on investigation
- Awaiting funds to begin study

Solution:

- Still to be determined but will likely include the rehabilitation and replacement of existing relief wells and possibly the construction of additional relief wells, and rehabilitation of some corrugated metal pipes.



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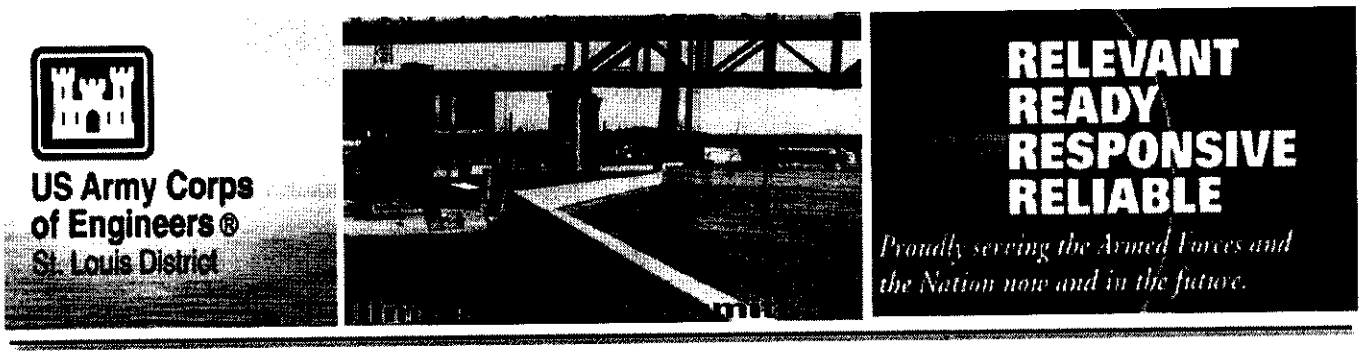
LTC David Berczek	Risk Assessment Model

Last updated:
08/17/2007 09:18

Technical point-of-contact:
Nicole Dalrymple



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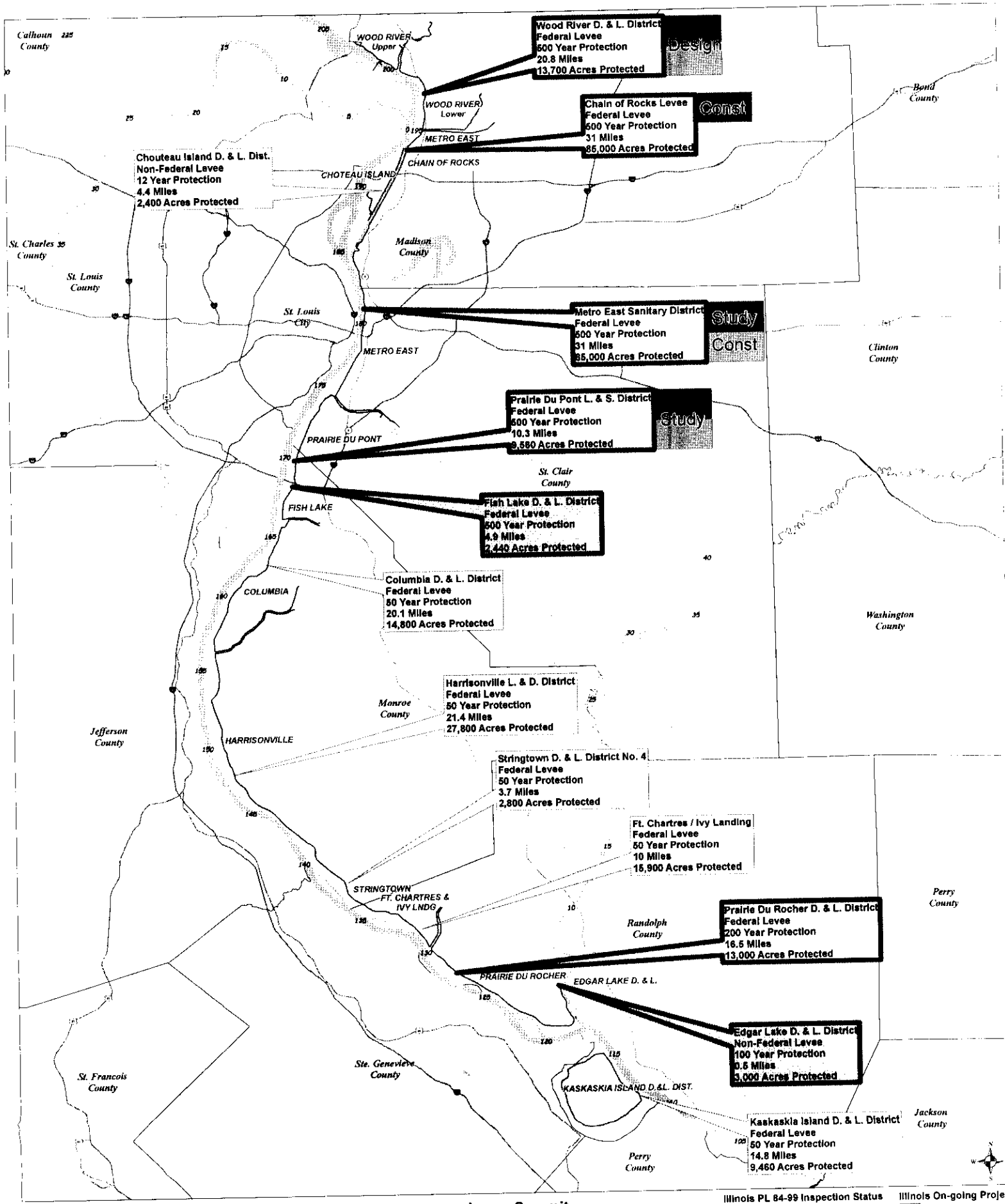

Levee Summit
State of Illinois Mississippi River Levees
Alton to Kaskaskia

0 1.5 3 6 9 12 Miles

US Army Corps of Engineers ®
St. Louis District

Illinois PL 84-99 Inspection Status
- Acceptable
- Minimum Acceptable
- Unacceptable

Illinois On-going Projects
- Design Deficiency
- Reconstruction
- New Levee or Levee Raise

Flood Protection
- </= 1% annual chance of flooding in a given year (Requires Certification)