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Clerk of the Board Illinois Pollution Control Board 100 W. Randolph Suite 11-500 Chicago, IL 60601

STATE OF ILLINOIS PORCHOE Control Board Dec. 31, 2007 JAN 0 4 2008 STATE OF ILLINOIS Pollution Control Board

PLB08-42

Re: Request for time extension to appeal IPCB permit to PDC

Dear Sirs:

With this letter we hereby request :

An extension of one month, January, to file appeals of the IEPA's new permit (termed "permit renewal") issued by the IEPA for the continued operation of the Peoria Disposal Co.'s hazardous waste landfill at Peoria with no terminal date.

Enclosed is an "overview" of objections and history, which will be followed with detailed objections and suggestions.

Explanation:

1) The period given by the IEPA to respond to its permit decision was precisely coterminous with the Christmas holiday season (Thanksgiving to New Year's Day) when people are deeply preoccupied with family and friends -- as I have been with my far-flung children and grandchildren.

2) This is a vital matter to the health and welfare of the people, and vitality, of the Peoria area, perhaps the most vital local issue in its history. Yet there has been no publicity about the existence of the revision of this hugely important permit.

3) There is <u>no need</u> to rush public response to this very technical document. It has been in effect, with IEPA extensions, for 20 years and has two years to go (2009) under its present extension. Its proposed replacement by the IEPA -- and first ever provision for public review -- deserves much more appropriate time for this needed review.

Thank you,

Tom Edwards

Tom Edwards/*River Rescue* 902 W. Moss Ave. Peoria, IL 61606

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To: Illinois Pollution Control Board: Dec. 31, 2007 From: Tom Edwards/*River Rescue* 902 W. Moss Ave., Peoria, IL 61606

Submitted with request for one month time extension for: Appeal of IEPA's Nov. 27, '07 RCRA permit renewal for PDC's Peoria landfill <u>Preview</u> of appeal follows:

Overview: Toxic Waste Landfill Endangers Peoria Area

Why would a government agency want to extend operation of what is now realized to be a dangerously located toxic waste landfill that puts the people of a major community in harms way? That is the situation with Peoria Disposal Co.'s hazardous waste landfill.

The daily dumping of highly toxic waste from much of the nation at PDC's Peoria landfill risks the well being of people of this area to benefit other communities -- and the landfill's owners. *It is a sacrifice* that does not have to be made, or permitted by EPA.

Instead, we need to have Illinois become a leader in safe, sane disposal of toxic, poisonous waste. But at present the state and federal EPAs permit <u>843</u> of the nation's most toxic chemicals from, so far, 15 states to either be put on a hilltop on Peoria's west edge to, later, be dirt covered and called a "landfill" -- or volatilize into the air, as much does.

PDC's toxic waste landfill, the only operating one in Illinois, is also the *only* one of 16 in 13 states that even sits <u>near</u> an aquifer from which most of a city's water is pumped.
And PDC's sits directly over Peoria's aquifer, as close as 50 feet above it.
PDC's landfill is <u>also</u> the only such one nationally that is immediately upwind of a municipality and the air its people breathe -- and that also has a dense population living right up to the perimeter of such a landfill let alone near one.

<u>But staff of the Illinois EPA say they are **not allowed** to take into consideration the above two hugely vital matters to health and welfare. Also, neither were weighed in the issuance of PDC's toxic waste permit in 1987 by just learning government regulators. It was superimposed upon PDC's then 60-year-old general dumping site.</u>

And now with less than two years left on PDC's present greatly extended permit -instead of closure the IEPA is putting its efforts into "permit renewal" despite the Peoria County Board having exercised its legal right and voted "**no**" to a new permit. PDC appealed, but the county denial was upheld by the Illinois Pollution Control Board.

Recent scientific analyses of people elsewhere living near such toxic landfills have shown higher rates of birth defects, premature births, and strokes in older people. The federal EPA ranks Peoria County by far highest in Illinois for toxic chemical releases, and l6th in nation, with PDC's releases 21 times greater than the next highest in Peoria County.

While the IEPA presses to keep the PDC landfill in operation, there is no indication it is even suggesting safer, superior sites. IEPA staffers emphasize they are **not** allowed to do that, either. <u>Yet Peoria County is surrounded by over 100,000 acres of stripmined land</u>, including 17,000 acres of such vacant land owned by Cook County Sanitary District.

EPA's permit to PDC was originally for 10 years. But via extensions it is now in its 21st year. EPA has until now been regularly granting extensions <u>without</u> public hearings that it is mandated to hold. Now the IEPA has been preparing substitute permit language rather than preparing for closure of the landfill. The new permit issue has been before the county board for 4 years, the length of World War II.

Yet IEPA is giving just this month -- the Christmas holiday period when people are most preoccupied -- for the public to digest its new 197-page highly technical permit.

Yet, PDC has already well exceeded the EPA's original permitted waste volume, though it is titularly still in effect. And PDC has applied for a permit to triple its volume -- which would make its humongous hill of toxic waste the *highest* hill, by far, in its vicinity.

If we knew in 1987 what we know now, such a landfill in that location would certainly never have been permitted. State and federal officials <u>need</u> to correct that mistake. They can if they will.

We ask that, rather than a new permit, the EPA concentrate on simply getting:

- 1) Closure and post-closure regulations greatly strengthened;
- 2) And stronger state laws regarding such landfills.

(Note: Sources are available for all the above points.)

Yom Edwards