

7135 W. Cantrell
Decatur, IL 62522
June 2, 2010

Illinois Pollution Control Board
Attn: Clerk
100 W. Randolph St.
Chicago, IL 60601

Re: Case #2010-031
Veolia ES Valley View Landfill, Inc.
Vs.
County Board of Macon County, Illinois

The purpose of this communication is to provide comments from the Coalition of Harristown Residents (Coalition) concerning the Criteria II Conditions imposed by the Macon County Board (Board) to which Veolia has expressed disagreement.

Condition #8 – Pumping

The Coalition expresses support for the Board's condition. The Pollution Control Board has authority over the Illinois Environmental Protection Agency (IEPA) to assign the ultimate releasing responsibility to the Board. This Board is responsible to see that reliable safeguards are in place to protect the Coalition residents and the responsibility to see that such safeguards are timely and adequately monitored with results and exceptions being communicated to residents.

Condition #9 – Financial Assurance

The Coalition supports this condition as written. Again, the Board is responsible to protect the residents from financial harm which may result from the Landfill at some future time. A perpetual care trust fund must be established, and under no circumstances should the IEPA release Veolia from this financial assurance.

The Coalition also questions the basis for concluding a \$50,000 annual payment is adequate. Further, what is the required timing of the annual payment?

Condition #11 – Leachate Elevations

The Coalition supports stringent and frequent leachate controls, monitoring of test results, and the timely reporting of those results and the related corrective action required. We are especially concerned about leachate because of the history of the landfill ownership and our lack of confidence in consultant testimony during the proceedings which proffered that there was no concern regarding potential adverse effects upon residential water supplies. Water supply issues were raised by the Coalition as far back as the Host Agreement proceedings. We requested consideration of extending Decatur water to area residents which could have been financed via a waste tariff over the estimated twenty eight years of additional landfill generation. It is

imperative that the PCB, IEPA and Macon County Board take all positive steps necessary to assure the quality and quantity of residential water supplies.

Condition #19 – Gradient Control System

The Coalition supports stringent groundwater testing. This condition as presently written requires only one annual test. We believe this is inadequate and further question the absence of any requirement to test groundwater **around** the landfill.

Condition #27 – Visual Barriers

The Coalition firmly believes that visual barriers are essential to the appearance of the landfill within a residential area. Erosion on the sides of the present landfill has been unsightly for too long. Other landfills within Illinois have been relatively successful with landscaping (i.e. Cahokia and Pontiac.) In some cases winding roadways have been neatly constructed (like a winding mountain road) for equipment access to the landfill.

Summary Position of the Coalition

Thus far in the landfill expansion proceedings, which began with the new host agreement, the coalition has not had a feeling of confidence that expansion issues impacting quality of life have been sincerely addressed. Standards for water testing, leachate controls, and visual barriers are only as effective as the agency performing the monitoring and driving accountability for results. At the end of the day, Veolia and any of the above regulatory agencies should all want an operational landfill, especially one with expansion in a residential area, to be recognized for excellence in safe operations. This would lead to the resolution of many quality of life and property value issues for the neighborhood and improve Veolia/residential relations.

Respectfully submitted,
Elmer R. Turner
Chairman, Harristown Coalition of Residents