

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

COALVILLE ROAD ENTERPRISES,)
INC., an Illinois corporation,)
)
 Petitioner,)
)
 vs.)
)
 ILLINOIS ENVIRONMENTAL)
 PROTECTION AGENCY,)
)
 Respondent.)

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Pollution Control Board

PCB No. 10-76
(Landfill Permit Appeal)

NOTICE OF FILING

To: Robert M. Riffle
Elias, Meginnes, Riffle & Seghetti, P.C.
416 Main Street, Suite 1400
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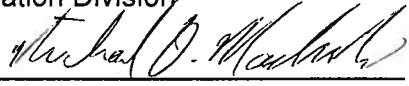
PLEASE TAKE NOTICE that on this date I mailed for filing with the Clerk of the Pollution Control Board of the State of Illinois, a corrected copy of a document filed in the AGENCY RECORD, a copy of which is attached hereto and herewith served upon you.

Respectfully submitted,

PEOPLE OF THE STATE OF ILLINOIS

LISA MADIGAN,
Attorney General of the
State of Illinois

MATTHEW J. DUNN, Chief
Environmental Enforcement/Asbestos
Litigation Division

BY: 

MICHAEL D. MANKOWSKI
Assistant Attorney General
Environmental Bureau

500 South Second Street
Springfield, Illinois 62706
217/782-9031
Dated: November 10, 2010

CERTIFICATE OF SERVICE

I hereby certify that I did on November 10, 2010, send by First Class Mail, with postage thereon fully prepaid, by depositing in a United States Post Office Box a true and correct copy of the following instruments entitled NOTICE OF FILING and a corrected copy of a document filed in the AGENCY RECORD


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Carol Webb
Hearing Officer
Illinois Pollution Control Board
1021 North Grand Avenue East
Springfield, IL 62794


MICHAEL D. MANKOKWSKI
Assistant Attorney General

This filing is submitted on recycled paper.

Memorandum

Date: November 7, 2007 *GT*
11-7-07
To: Shanti Shah
From: Brett Bersche
Re: Streator Area Landfill
1058220007 - Livingston-County
Permit Nos. 1982-24-DE and 1982-34-OP
Technical Review
Application Log No. 2007-355

A review of the groundwater portion of Supplemental Permit Application, Log No. 2007-355 for Streator Area Landfill has been completed. The application is dated August 15, 2007 and was received by the Illinois EPA on August 15, 2007. Douglas Mauntel of Andrews Environmental Engineering Inc prepared this application. Streator Area Landfill is subject to 35 IAC 807 regulations.

This application was submitted in response to Condition 23 of Attachment A, which requires an Annual Corrective Actions report, and Condition 24 of Attachment A, which requires an assessment monitoring report for G105.

Applicant's Discussion (Corrective Action Report)

"Special Condition No. 23 of Supplemental Permit No. 2005-087-SP requires the operator to prepare an assessment evaluating the effectiveness of the Corrective action ongoing at the facility. The corrective action consists of two gas vents, which were installed in the vicinity of monitoring wells G103 and G104 to reduce potential gas migration in that area. On February 14, 1995, two gas vents were installed in accordance with the facility's developmental plan. As discussed in Illinois EPA Log No. 1998-288, some organic parameters detected in groundwater samples from wells G103 and G104 correlated with the parameters detected in gas samples obtained from the gas vents installed in 1995. To further reduce the potential effects of gas migration in the groundwater, additional gas vents (two) were installed in the vicinity of G103 and G104 in December 1998. Previous gas analyses indicated that the elevated concentrations detected in groundwater samples from wells G103 and G104 were likely the result of gas migration."

"Graphical analysis for each detected parameter is included in Attachment C. A brief discussion of any noted trends is provided below. Table 3 provides a comparison of the detected organic parameters during the review period (third quarter 2005 through second quarter 2006) to the permitted specified PQLs. As shown, only concentrations of 1,1-dichloroethane, carbon disulfide, cis-1,2-dichloroethene, ethyl ether and vinyl chloride are currently above the respective PQL in well G103 or G104. A discussion is not provided for 1,1-dichloroethene, 1,2-dichloropropane, chloromethane, phenolics, toluene, trans-1,2-dichloroethene or total xylene

since these parameters have not been detected above the permitted PQL at either well and no increasing trends are apparent.”

The applicant provides a parameter by parameter discussion detailing detections and trends for the following detected parameters that are currently under corrective action at G103 and G104: 1,1-dichloroethane, acetone, benzene, bis(2-ethylhexyl)phthalate, carbon disulfide, chloroethane, cis-1,2-dichloroethene, dichlorodifluoromethane, ethyl ether, methylene chloride, tetrachloroethene, trichloroethene, and vinyl chloride.

“Assessment monitoring of the groundwater at wells G103 and G104 continues in accordance with Supplemental Permit No. 1998-288-SUP. Results show the concentrations of the majority of the subject parameters continue to decrease or have minor, yet stable fluctuations as a result of the seasonal variation of the water table. Of the previously detected organics, only four constituents (1,1-dichloroethane, cis-1,2-dichloroethene, ethyl ether and vinyl chloride) had detections above the PQL during the evaluation period (third quarter 2006 through second quarter 2007). In addition, data from the most recent quarterly sampling events typically indicate decreasing trends for parameters that had appeared to be increasing during previous annual evaluations (vinyl chloride and cis-1,2-dichloroethene). Although concentrations of both vinyl chloride and cis-1,2-dichloroethene have shown recent decreases, an increase or stabilization may occur as dechlorination of more highly chlorinated solvents such as tetrachloroethene and trichloroethene continues. The breakdown of these complex solvents produces simpler chlorinated solvents such as dichloroethene and vinyl chloride produces simpler chlorinated solvents such as dichloroethene and vinyl chloride. Dechlorination of these lower chlorinated solvents (cis-1,2-dichloroethene and vinyl chloride) requires stronger reducing conditions and therefore does not occur as readily. However, the decreases noted in tetrachloroethene and trichloroethene concentrations indicate that the corrective measures have been and continue to be effective in reducing/eliminating the landfill gas source.”

The applicant proposes to continue the corrective action measures and submit the next corrective action report by August 15, of 2008.

Illinois EPA Response

On going corrective actions have been conducted at G103 and G104 since 1998 as approved in Log No. 1998-288.

Review of the permitting history and discussions with Coleen Grey of Andrews Environmental on November 7, 2007, reveals that a formal Groundwater Management Zone has not been established for the site. A condition will be added to the permit for the applicant to delineate the horizontal and vertical extent of landfill gas impacts at the facility and propose a formal groundwater management zone (GMZ) for G103 and G104.

Review of Agency's groundwater files of the other sites monitoring wells: G101, G102, and G106 from 2nd Quarter 2000 through 2nd Quarter of 2004 reveals no detections of organic parameters or significant changes in landfill gas indicator parameters that may suggest landfill gas impacts beyond the area of corrective actions implemented. However, G105 does exhibit detections of cis-1,2-dichloroethene, tetrachloroethene and trichloroethene. G105 is under assessment and is discussed by the applicant later in this review.

Organic detections at G103 and G104 exhibit a continued decrease since 2000 with the exception of vinyl chloride and cis-1,2-dichloroethene. It is likely the slight overall increase of vinyl chloride and cis-1,2-dichloroethene concentrations observed are due to the natural degradation of organic parameters. These constituents will be re-evaluated in the 2007 corrective action report and if significant increases are observed, improvements upon the corrective action plan may be required.

The corrective actions implemented are mitigating impacts upon groundwater quality. It is recommended the current corrective action activities continue at this time.

Applicant's Discussion (Assessment Monitoring Report for G105)

"In accordance with Supplemental Permit No. 1998-288-SP, assessment monitoring of the groundwater at monitoring well G105 was implemented. Results indicate recent decreases in dissolved ammonia and dissolved chloride concentrations. TOX concentrations continue to fluctuate but are below those recorded in the upgradient wells. The assessment results for these three parameters do not establish an impact associated with the waste unit. However, the recent organic detections (cis-1,2-Dichloroethene, tetrachloroethene and trichloroethene) during the ... second quarter 2007 sampling event indicate further assessment is necessary."

"Since the detected parameters are the same as those evaluated under Condition 23 and well G105 is downgradient of the area addressed by the corrective actions for Condition 23 is it recommended to add the assessment of G105 to Special Condition No. 23 of the permit. The headspace measurements indicate that the landfill gas has not migrated further downgradient and is being mitigated by the permitted corrective actions. The elevated concentrations may be associated with migration of groundwater or may be an anomalous detection. As shown by the potentiometric surface maps provided in Attachment B, impacted groundwater at G103 and G104 flows to the southeast towards well G105. To further evaluate this possibility, it is proposed to:

- Sample well G105 for the list 4 parameters during the next four quarters; and
- Collect a leachate sample during the fourth quarter 2007 from gas vent GV-3. The sample will be analyzed for parameters contained in Lists 2 and 3."

"The results will be provided in the annual evaluation of the effectiveness of the corrective actions (Condition 23) by August 15, 2008. If the results indicate the second quarter 2007 results were anomalous, the application will propose to return well G105 to routine sampling. If further increases are noted, the application will contain recommendations for additional corrective measures, if necessary."

Illinois EPA Response

The applicant proposes to further evaluate the source of impacts (landfill gas or leachate). The corrective actions implemented are for landfill gas. If the source is determined to be leachate, then additional corrective action measures will be warranted.

As previously discussed, a formal Groundwater Management Zone has not been established for the corrective actions implemented or for the site. A condition will be added to the permit for the applicant to conduct the proposed assessment activities and delineate the source, rate, vertical and horizontal extent of contamination and propose a formal Groundwater Management Zone.

Proposed Permit Revisions for List 4

"Table 4 in approved Log No. 2006-305 contained the historical data for parameters that have never exceeded the standards set forth in Attachment A Condition 6. It was recommended that the parameters listed in Table 4 be removed from the List 4 quarter assessment monitoring list. Upon approval of Log No. 2006-305, the parameters on page two were removed from List 4, while the page one parameters were overlooked."

The applicant provides a copy of Table 4 in Attachment D.

Illinois EPA Response

Review of Log No. 2006-305 indicates that the parameters to be removed in Table 4 was approved, but only page two was removed, not page one.

List 4 of the permit contains organic parameters to be monitored quarterly as part of the corrective actions. The parameters to be removed are constituents that have been non-detect since 1997. This will be corrected upon permit issuance. It is noted, that List 2: Routine Indicator Parameters and List 3: Inorganic and Organic Annual Parameters list remains unchanged.

Proposed Correction to Background Values

The applicant contends that background for dissolved cadmium and total cyanide was developed incorrectly. The parameters are 100% non-detect in the data set, and the applicant identified the detection limit to be 2.5 ug/L where as the actual method detection limit is 5 ug/L. So, ½ the detection limit was miss labeled as the detection limit which resulted in background concentrations of 2.5 ug/L instead of 5 ug/L.

Illinois EPA Response

The applicant provides in Attachment's E and F the raw analytical reports identifying a detection limit of 5 ug/L and provides the revised calculations. Since dissolved cadmium and total cyanide data sets are 100%, the background is set at the detection limit of 5 ug/L. The proposed corrections are appropriate and the List 2 and 3 will be revised accordingly.

Illinois EPA Recommendations

With respect to groundwater issues, it is recommended that Supplemental Permit Log No. 2007-355 be approved.

Specifically, This Permit Approves:

- 2007 Annual Corrective Action Report
- Assessment Monitoring Report and continued assessment for Monitoring Well G105.
- Revisions to List 4
- Corrected background values for dissolved cadmium and total cyanide.

Changes To The Permit

- Revised the backgrounds to 5 ug/L for total cyanide and dissolved cadmium in the List 2 and List 3 of Condition 18 of Attachment A.
- Removed 34 constituents from the List 4: Quarterly Assessment Volatile Organic Parameters of Condition 18 of Attachment A.
- Condition 24 of Attachment A is revised to:

The operator shall perform assessment monitoring activities for monitoring well G105 as described in Log No. 2007-355. The operator shall submit all findings, conclusions, trend analysis, all groundwater/leachate data presented in tabular form, proposed course of actions, identification of source of impacts, and re-evaluate current corrective actions. If it is determined that the source of impacts is from Streator Area Landfill, the operator should propose a Groundwater Management Zone (GMZ) delineating the horizontal and vertical extent of contamination. Additional downgradient investigation activities will be required to establish a GMZ downgradient of G105. This should include vertical and lateral investigations. Furthermore, the operator should delineate the vertical and horizontal extent of contamination observed at G103 and G104 and propose a formal Groundwater Management Zone. *THIS ASSESSMENT SHALL BE SUBMITTED*

as a supplemental permit application to the Illinois EPA by August 15, 2008.

*BGB
11/15/07*

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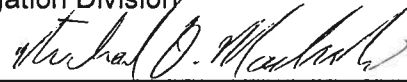
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BY:



MICHAEL D. MANKOWSKI
Assistant Attorney General
Environmental Bureau

500 South Second Street
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217/782-9031
Dated: November 10, 2010

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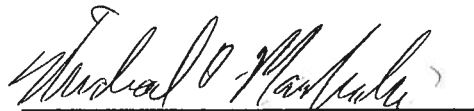
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Assistant Attorney General

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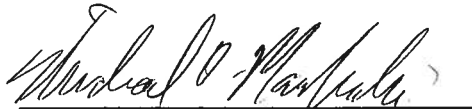
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