

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

CONGRESS DEVELOPMENT,)
COMPANY)
)
Petitioner,)
)
v.)
)
ILLINOIS ENVIRONMENTAL)
PROTECTION AGENCY,)
)
Respondent.)

RECEIVED
CLERK'S OFFICE

JUN 28 2013

PCB 13-57
(Permit Appeal - Land)

STATE OF ILLINOIS
Pollution Control Board

CERTIFICATE OF SERVICE

I hereby certify that on June 28, 2013, I served copy of the foregoing Petitioner's Motion

To Dismiss by electronic mail on:

Elizabeth Wallace
Jamie Davidson
Assistant Attorneys General
69 West Washington Street, 18th Floor
Chicago, Illinois 60602

By: 

Russell R. Eggert
Andrew L. Schulkin
LATHROP & GAGE LLP
155 N. Wacker Drive
Suite 3050
Chicago, Illinois 60606
312.920.3300 (Telephone)
312.920.3301 (Facsimile)

Attorneys for Petitioner Congress
Development Company



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276 • (217) 782-2829

PAT QUINN, GOVERNOR

LISA BONNETT, DIRECTOR

CERTIFIED MAIL #7008 1140 0004 7345 2325
RETURN RECEIPT REQUESTED

JUN 25 2013

Tamara Sands
Project Manager
Cornerstone Environmental Group, LLC
400 Quadrangle Drive, Suite E
Bolingbrook, Illinois 60440

**RE: Congress Development Company – Hillside Landfill
I.D. 031123ABP
Request for Positive Pressure Limits for Active Landfill Gas Extraction
Collectors**

Dear Ms. Sands:

The Illinois Environmental Protection Agency (“Illinois EPA”) received your letter, dated May 10, 2013, submitted on behalf of Congress Development Company – Hillside Landfill (“Congress”), requesting positive pressure limits for four (4) active landfill gas extraction collectors named as CD00GW36, CD00RW93, CD0WN105, CD0WN205.

35 Ill. Adm. Code 220.250(b) requires the owner or operator of a landfill to operate each interior wellhead with negative pressure except under certain conditions. 35 Ill. Adm. Code 220.250(b)(2) allows an owner or operator of a source that utilizes a geomembrane or synthetic cover to develop pressure limits associated with such a cover for Illinois EPA approval. Congress has a geomembrane cover and several feet of additional cover soils on top of this cover.

The Illinois EPA has reviewed your request and supporting documents and is granting temporary approval until September 30, 2013, as follows:

Collector ID	Collector Type	Soil Cover Depth (ft)	Maximum Positive Pressure (" H ₂ O)
CD00GW36	Vertical	5	20
CD00RW93	Vertical	25	100
CD0WN105	Horizontal	5	20
CD0WN205	Horizontal	5	20

4302 N. Main St., Rockford, IL 61103 (815) 987-7760
595 S. State, Elgin, IL 60123 (847) 608-3131
2125 S. First St., Champaign, IL 61820 (217) 278-5800
2009 Mail St., Collinsville, IL 62234 (618) 346-5120

9511 Harrison St., Des Plaines, IL 60016 (847) 294-4000
5407 N. University St., Arbor 113, Peoria, IL 61614 (309) 693-5462
2309 W. Main St., Suite 116, Marion, IL 62959 (618) 993-7200
100 W. Randolph, Suite 10-300, Chicago, IL 60601 (312) 814-6026

Congress Development Company – Hillside Landfill

I.D. 031123ABP

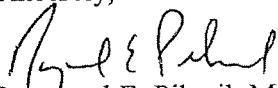
Request for Positive Pressure Limits for Active Landfill Gas Extraction Collectors

Page 2

Long term approval of the positive pressure parameters, however, must be obtained by submittal and approval of a revised gas collection and control design (“GCCS”) plan for the site. By July 30, 2013, Congress shall submit a revised GCCS to the Illinois EPA for review and acceptance.

Questions regarding this matter should be directed to Yasmine Keppner-Bauman of my staff at 217/524-0908.

Sincerely,



Raymond E. Pilapil, Manager

Compliance Section

Bureau of Air

REP: ykb

Bcc: YKB
MW
Bill Franek
Reg. 1
I.D. file



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276 • (217)782-2829

PAT QUINN, GOVERNOR

LISA BONNETT, DIRECTOR

JUN 25 2013

CERTIFIED MAIL #7008 1140 0004 7345 2332
RETURN RECEIPT REQUESTED

Tamara Sands
Project Manager
Cornerstone Environmental Group, LLC
400 Quadrangle Drive, Suite E
Bolingbrook, Illinois 60440

**RE: Congress Development Company – Hillside Landfill
I.D. 031123ABP
Requests for Alternate Operating Parameters for Oxygen and Temperature
for Active Landfill Gas Extraction Collectors**

Dear Ms. Sands:

The Illinois Environmental Protection Agency (“Illinois EPA”) received your letters, dated May 10, 2013, submitted on behalf of Congress Development Company – Hillside Landfill (“Congress”), requesting alternate operating parameters for oxygen and temperature for several active landfill gas extraction collectors. The collectors exhibit exceedances of the oxygen and temperature standards found in 35 Ill. Adm. Code Part 220.

Congress states in its requests the cause for these exceedances is due to an abiotic exothermic process within the permitted waste boundaries of the landfill resulting in elevated oxygen concentration, production of liquids and hydrogen, and high temperatures. Further, Congress states that the nature of the abiotic exothermic process is such that methane concentrations in these collectors do not exhibit typical responses to corrective measures such as changes in vacuum or increases or decreases in temperatures, and that additionally, changes in temperature and oxygen concentrations are typically independent of any corrective measures applied and are a product of the abiotic exothermic process. For these reasons Congress is seeking higher oxygen and temperature operating values for multiple collectors in accordance with 35 Ill. Adm. Code 220.205(c).

35 Ill. Adm. Code 220.205(c) provides that a higher operating value may be established at a particular well, provided that a higher operating value demonstration with supporting data showing that the elevated parameter does not cause fires or significantly inhibit anaerobic decomposition by killing methagens is submitted to and approved by the Illinois EPA. Information submitted by Congress indicates that while the abiotic exothermic process is affecting wells in portions of the entire landfill, the majority of the exceedances are occurring on the western one-third of the landfill in the proximity of the origin of the abiotic exothermic process.

4302 N. Main St., Rockford, IL 61103 (815) 987-7760
595 S. State, Elgin, IL 60123 (847) 608-3131
2125 S. First St., Champaign, IL 61820 (217) 278-5800
2009 Mall St., Collinsville, IL 62234 (618) 346-5120

9511 Harrison St., Des Plaines, IL 60016 (847) 294-4000
5407 N. University St., Arbor 113, Peoria, IL 61614 (309) 693-5462
2309 W. Main St., Suite 116, Marion, IL 62959 (618) 993-7200
100 W. Randolph, Suite 10-300, Chicago, IL 60601 (312) 814-6026

Congress Development Company – Hillside Landfill

I.D. 031123ABP

Request for Alternate Operating Parameters for Oxygen and Temperature for Active
Landfill Gas Extraction Collectors

Page 2

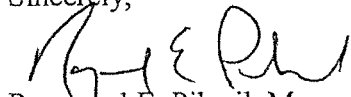
The Illinois EPA has reviewed your request and supporting data for higher oxygen and temperature operating values and is granting your request until December 31, 2013. Specific approved wells and allowable parameters are outline in the attached tables.

Approval of this request is subject to the following conditions:

- Congress must perform monthly carbon monoxide monitoring of these wells in conjunction with oxygen, temperature, and pressure monitoring. Congress must report the results of this monitoring to the Illinois EPA within 30 days of the monitoring event.
- Congress shall conduct surface monitoring around the wells in accordance with regulatory requirements and appropriate corrective actions shall be taken as necessary.
- Congress must make observations for substantial settlement over a short period of time, smoke or smoldering odor emanating from the gas extraction system or landfill in the area of the wells, and combustion residue in the extraction wells and/or headers.
- The higher temperature and/or oxygen value shall terminate if temperature or oxygen levels in the wells drops below, and can be maintained below, the regulatory limit.

Questions regarding this matter should be directed to Yasmine Keppner-Bauman of my staff at 217/524-0908.

Sincerely,



Raymond E. Pilapil, Manager

Compliance Section

Bureau of Air

REP: ykb

Bcc: Maureen Wozniak
Bill Franek
John Waligore
Mark Gurnik
Reg 1

Approved Higher Operating Values: Oxygen

Landfill Location	Well Type	Well ID	Approved Oxygen HOV
Western 1/3	Vertical	CD00RW84	10
		CD0RW104	
		CD00GW74	15
		CD00GW98	
		CD00RW77	
		CD00RW89	
		CD00RW92	
		CD00RW94	
		CD0GW107	
		CD0GW120	
		CD0GW123	
		CD00GW73	20
		CD00GW99	
		C00GW101	
		C00GW112	
		C00GW113	
		CD0GW114	
		CD0GW119	
	CD0RW106		
	Horizontal	CD0WE101	10
		CD0WN107	
		CD0WS105	
		CD0WS106	
		CD0WS107	
		CD0WS108	
		CD0WE105	15
		CD0WN104	
		CD0WN110	20
		CD0PHR02	
		CD0PHR03	
		CD0PHR04	
		CD0PHR05	
		CD0PHR06	
		CD0PHR07	
		CD0WE104	
		CD0WN101	
		CD0WN102	
		CD0WN103	
		CD0WN106	
		CD0WN204	
		CD0WN205	
		CD0WS103	
		CD0WS201	
		CD0WS203	
		CD0WS204	
CD0WW103			
CD0WW104			
CD0WW105			
CD0WW201			
CD0WW202			
CD0WE102	21		
CD0WN108			
CD0WN109			
CD0WN201			
CD0WW203			
CD0WW204			
CD0WW205			

Approved Higher Operating Values: Oxygen (continued)

Landfill location	Well Type	Well ID	Approved Oxygen HOV	
Eastern 2/3	Vertical	CD00GW01	10	
		CD00GW43		
		CD00GW61		
		CD00RW38		
		CD00GW42	15	
		CD00RW50		
		CD00RW51		
		CD00RW55		
		CD00RW70	20	
		CD00GW08		
		CD00GW18		
		CD00GW20		
		CD00GW30		
		CD00RW09		
		CD00RW24		
		CD00RW57		
		CD00RW58		
		CD00RW69		
	Horizontal	Horizontal	CD0PHR13	10
			CD0PHR14	
			CD0PHR15	
			CD0PHR16	
			CD0PHR18	
			CD0PHR19	
			CD0PHR21	
		CD0PHR12	15	
		CD0PHR20		
		CD00HR01	20	
CD0PHR09				
CD0PHR11				
CD0PHR22				
CD0PHR23				
CD0PHR24				
CD0PHR25				
CD0PHR27				
CD0PHR28				

Approved Higher Operating Values: Temperature

Landfill location	Well ID	Approved Temperature HOV
Western 1/3	CD00RW85	170
	CD00RW88	
	CD00RW97	
	CD0GW111	
	CD0GW122	
	CD0RW104	
	CD00GW54	175
	CD00RW87	
	CD00RW92	
	CD0GW100	
	CD0GW113	
	CD0RW105	
	CD00GW74	180
	CD00RW84	
	CD00RW95	
	CD0GW101	
	CD0GW119	
CD0RW116		
Eastern 2/3	CD00RW93	184
	CD0GW107	
	CD00RW78	145
	CD00RW57	155
	CD00RW68	156
	CD00RW55	190