4. Completeness Requirements

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Page 2 of 5

The following items must be checked Yes, No or N/A. Each item will be reviewed for completeness by the log clerk. Blank items will result in rejection of the application. Please refer to the instructions for further guidance.

_____. Have all required public notice letters been mailed in accordance with the LPC-PA16 instructions? 🛛 Yes 🔲 No 🛄 N/A

(If so, provide a list of those recipients of the required public notice letters for illinois EPA retention. Such retention shall not imply any Illinois EPA review and/or confirmation of the list.)

Public Notice Recipients

Name: Thomas Johnson		Titie: State Senator	
Street Address: 1725 S Naperville Road, Suit	te 200		P.O. Box:
City: Wheaton Stat		60069 Phone:	630-682-8100
Name: Mike Fortner		Title: State Representativ	e
Street Address: 135 Fremont Street			P.O. Box:
City: West Chicago Stat	te: II Zip Code:	60185 Phone:	<u>630-293-9344</u>
Name: Dan Cronin		Title: DuPage County Bo	ard Chairman
Street Address: 421 N. County Farm Road			P.O. Box:
City: Wheaton Stat	te: IL Zip Code:	60187 Phone:	630-407-6060
Name: Gary King		Title: County Clerk	
street Address: 421 N. County Farm Road			P.O. Box:
City: Wheaton Stat	te: IL Zip Code:	60187 Phone:	630-407-5500
Name: Robert Berlin		Title: States Attorney	
Street Address: 503 N. County Farm Road			P.O. Box:
City: Wheaton Stat	te: IL Zip Code:	60187 Phone:	630-407-8000
Name: Nancy Smith	· · · · · · · · · · · · · · · · · · ·	Title: Clerk	
Name: <u>Nancy Smith</u> Street Address: <u>West Chicago City Hall, 475 I</u>		Title: <u>Clerk</u>	P.O. Box:
	Main Street		
Street Address: West Chicago City Hall, 475 I	Main Street te: ILZip Code:		
Street Address: <u>West Chicago City Hall, 475 I</u> City: <u>West Chicago</u> Stat Name: <u>Heidi Wetzel</u>	Main Street te: ILZip Code:	60185 Phone: Title: <u>Clerk</u>	630-203-2200
Street Address: West Chicago City Hall, 475 I City: West Chicago State Name: Heidi Wetzel Street Address: 100 North Island	Main Street te: IL Zip Code:	60185 Phone: Title: <u>Clerk</u>	<u>630-203-2200</u> Р.О. Вох:
Street Address: West Chicago City Hall, 475 I City: West Chicago Stat Name: Heidi Wetzel Street Address: 100 North Island City: Batavia Stat Name: Anne Mareachen Stat	Main Street te: IL Zip Code: te: IL Zip Code:	60185 Phone: Title: Clerk	<u>630-203-2200</u> Р.О. Вох:
Street Address: West Chicago City Hall, 475 I City: West Chicago Stat Name: Heidi Wetzel Street Address: 100 North Island City: Batavia Stat	Main Street te: IL Zip Code: te: IL Zip Code:	60185 Phone: Title: <u>Clerk</u> 60510-1930 Phone:	<u>630-203-2200</u> Р.О. Вох:

.

	Nar	me: Emily Larson			Title: Clerk				Pa	age 3 of 5
		et Address: City Hall, 28W701 Sta					P.(O. Box:		
	City	: Warrenville	State: IL	Zip Code:	60555	Phone:	630-3	93-9427		
	Nar	ne: Beth Melody			Title: Clerk					
	Stre	eet Address: 500 N. Gary Avenue					P.0	D. Box: _		
	City	Carol Stream	State: IL	_ Zip Code:	60188	Phone:	630-8	71-6250	_	
		· · · · · · · · · · · · · · · · · · ·								
	Nan	me: Nancy Garrison			Title: Clerk					
	Stre	et Address: 2 East Main Street						O. Box: _		
	City	: St Charles	State: IL	_ Zip Code:	60174	Phone:	630-3	77-4444	_	
	Nan	ne: Patti Engston			Title: <u>Clerk</u>					
	Stre	eet Address: 5N430 Railroad Stree	et				P.0	D. Box: _		
	City	Wayne	State: IL	Zip Code:	60184	Phone:	630-5	84-3090	_	
	Ĺ									
2	. а.	Is the Siting Certification Form (LP	C-PA8) complet	ed and enclo	osed?			🗌 Yes		
		Is siting approval currently under lit	, ,							_
		is sung approval currently under th	igaton					🗌 Yes		✓ N/A
	، رب									
		is a closure, and if necessary a pos	st-closure plan d	overing thes	e activities bei	na submitted	1. or	✓ Yes		
		has one already been approved?		_		-				
	υ.	Has one already been approved :	ti yes, provide	nie heinwir						
4	. а.	For waste disposal sites, only: Has	s anv emplovee.	owner. ope	rator, officer or	director of th	he	☐ Yes		[7] N/A
		owner or operator had a prior cond								
	Ь.	Have you included a demonstration	n of how you cor	mply or inter	d to comply wit	th		🗌 Yes	Na	√ N/A
		35 Ill. Adm. Code 745?						_		
_										
5.	. a.	Is land ownership held in beneficial	l trust?					🗌 Yes	✓ No	🗌 N/A
	b.	If yes, is a beneficial trust certificati	on form (LPC-P	A9) complet	ed and enclose	ed?		🗌 Yes	No 🗌	🗌 N/A
6.	а.	Does the application contain inform	ation or propos	als regarding	the hydrogeol	ogy; ground	water	🗌 Yes	🗸 No	🗌 N/A
		monitoring, modeling or classification monitoring for which you are reque		er impact as	sessment; or v	adose zone				
	h						-4-7		—	
~		If yes, have you submitted a third c	opy or the apple	Ladon (4 tot	any any support	ing docume	1(8 /	Yes	No	∐ N/A

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Page 4 of 5

5. Signatures:

Page 5 of 5

Original signatures are required. Signature stamps or applications transmitted electronically or by FAX are not acceptable.

applications shall be signed by the person designated below as a duly authorized representative of the owner an/or operator.

Corporation - By a principal executive officer of the level of vice-president or above.

Partnership or Sole Proprietorship - By a general partner or the proprietor, respectively.

Government - By either a principal executive officer or a ranking elected official.

A person is a duly authorized representative of the owner and operator only if:

- 1. They meet the criteria above or the authorization has been granted in writing by a person described above; and
- 2. Is submitted with this application (a copy of a previously submitted authorization can be used).

I hereby affirm that all information contained in this application is true and accurate to the best of my knowledge and belief. I do herein swear that I am a duly authorized representative of the owner/operator end I am authorized to sign this permit application form.

Any person who knowingly makes a false, fictitious, or fraudulent material statement, orally or in writing, to the Illinois EPA commits a Class 4 felony. A second or subsequent offense after conviction is a Class 3 felony. (415 ILCS 5/44(n))

Joseph Kramer	5-18-11
Joseph Kramer	Daté: / President
Printed Name:	Title:
Notary: Subscribed and Sworn before me this 18 day of Notary:	1ay_ 2011
My commission expires on: 9514	Stiendie C. P. tur
	Signature & Stamp/Seal of Notary Public
Operator Signature: Joseph Kramer	5-18-1/ OFFICIAL SEAL LUICINDIA C PETERS Date: NOTARY PUBLIC - STATE OF ILLINOIS MY COMMISSION EXPIRES (1006/14)
Printed Name:	
Notary: Subscribed and Sworn before me this 18 day of My commission expires on: $9/5/14$	Stelivedia C. Peters
E NOTAR	OFFICIAL SEAL UCINDIA C PETERS Y PUBLIC - STATE OF ALLNOIS OMMASSION EXPIRES:0405/14 Engineer's Tile; Senior Project Engineer
Company: JPL Environmental Engineertng	Registration Number. 062038498
Street Address: 1122 North Clark Street, #3803	PO Box:
City: Chicago State: IL	Zip Code: 60610-7899 Phone: 630-06224223
Email Address: jlardnerpe@aol.com	License Expiration Date: 11/30/2011
Signature: John P. Landren De	ate: 5/18/2011 Professional monores services



Bureau of Land • 1021 N. Grand Avenue E. • P.O. Box 19276 • Springfield • Illinois • 62794-9276

Application for Permit Relating to a Composting Facility for Landscape Waste (LPC-PA12)

1. Site Identification:

 A. IEPA ID Number: <u>N/A</u>

 Facility Name: <u>Kramer Tree Specialists Leef Mutch Facility</u>

 County: <u>DuPage</u>

 Street Address: <u>300 Charles Court</u>

 P.O. Box: ______

 City or Township: <u>West Chicago</u>

State: <u>IL</u> Zip Code: <u>60185</u>

B. Legal description of the site and legal description of the facility boundary, if different than the property boundary. You may provide additional information, if necessary, by clicking on the button below.

5.5 acres within a10 acre parcel described as a resubdivision of Lot 2 in North Industrial Park, in the Northeast Quarter of Section 8, Township 39 North, Range 9 East of the third principal meridian, according to the plan thereof recorded September 19,20005, as document R2005-206729, in DuPage County, Illinois

		_		·····			
Latitude:	41	52	56	Longitude:	88	13	36
	(Deg)	(Min)	(Sec)		(Deg)	(Min)	(Sec)

2. Facility Description:

Facility Type: New Facility

Existing BOL Permit Number: N/A

If a renewal, also list the Permit Modification Numbers: _____

3. Brief Narrative of the Proposed Activities Related to the Composting Operation:

Kramer Tree Specialists seeks a permit to collect store and process leaves in order to produce leaf mutch on 5.5 acres of concrete surface that currently serves as their mulch yard. The leaves will be stacked in piles up to 25 feet in height.

This Agency is authorized to require this information under Section 4 and Title X of the Environmental Protection Act (415 ILCS 5/4, 5/39). Failure to disclose this information may result in: a civil penalty of not to exceed \$50,000 for the violation and an additional civil penalty of not to exceed \$10,000 for each day during which the violation continues (415 ILCS 5/42). This form has been approved by the Forms Management Center.

Page 2 of 5

4. Applicant Identification:

Are the property owner and operator the same entity? (Yes C No

	Property On	wher		Q	perator. if different	
Name:	Kramer Land Dev	elopment LLC	Name:	Kramer Tree Specialists, Inc.		
Street Address:	300 Charles Court	<u> </u>	Street Address:	300 Charles Co	urt	
PO Box:		_	PO Box:			
City:	West Chicago	State: <u>IL</u>	City:	West Chicago	State: <u>IL</u>	
Zip Code:	60185	Phone: <u>630-293-5444</u>	Zip Code:	60185	_ Phone: <u>630-293-5444</u>	
Contact:	Joseph Kramer		Contact	Joseph Kramer		
Email Address:	ioe@kramertree.c	от	Email Address:	rthomas@kram	ertree.com	
		0	ther:			
		·	Name:			
		Operator	Street Address:		······································	
Mail Agency cor	respondence to:	Operator	PO Box:			
			City:		State:	
			Zip Code:	· · · ·	_Phone:	
5 Proof of La	nd Ownership	and Certification:	Contact.	·····		
			Emall Address:			
Operated by:						
🖌 Illinois Corpo	pration	Trust				
🔲 Individual		Government				
> C] Partnership		Other:				
\sim						
Presently ow	ned by Operator		oplicant for <u>5</u> year	5		
		Years of Lease Ren	- ,	5		
		Beginning Date of L	ease: 3/2008			
		Ending Date of Leas	se: <u>3/2013</u>			

6. Location Information:

Attach a copy of the United States Geological Survey (USGS) quadrangle map (7.5 minute quadrangle, if published) and a topographic map of the area which contains the comosting facility. Also provide a legal description of the site including the size in acres, present zoning classification and restrictions (if any).

Quadrangle Map provided: West Chicago	Jan 1, 1998
Name:	Date:
Other maps:	

7. Site Plan Map:

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Provide a copy of the plan map or plan sheets showing the boundaries of the facility, contours of the land relief and the location of all structures, utilities and improvements pertinent to the facility operation. Refer to item 7 of the instructions for information to be included on maps or plan sheets.

8. Detailed Description of the Facility:

Page 3 of 5

A written description of the facility, including the design and operating procedures that will be used at the facility to comply with the requirements of 35 IAC, Parts 830 and 831 must be provided. In the spaces provided below, indicate the page number or ion within the application where this information can be found (See number 8 in the instructions).

The following information must accompany the application. In the space provided, identify the page number or location in the supporting documentation where this information can be found.

Page number or location of information:

P. 8 Section 3:	Α.	Stormwater and landscape waste leachate controls as required pursuant to 35 IAC 830.204.
P. 15 Section 5	В.	An estimate of the maximum annual volume and peak daily volume of landscape waste the facility will be able to process and place into windrows or piles under proper conditions for composting within the time limits required by 35 IAC 830.203(a)(4) or 35 IAC 830.205.
Attachment 3	C.	Proof that the facility includes a setback of at least 200' from the nearest potable water supply well.
Attachment 4	D.	Proof that the facility is located outside the boundary of the 10-year floodplain or the site will be floodproofed.
Attachment 5	E.	Proof that the facility is located so as to minimize incompatibility with the character of the surrounding area, including at least 660' from the nearest residence (other than a residence located on the same property as the facility) and health facilities pursuant to 35 IAC 830.203(a)(3) (A-C).
Page 6	F.	Proof that the design of the facility will prevent any compost material from being placed within 5 feet of the water table, will adequately control runoff from the site and will collect and manage any leachate that is generated on the site in accordance with 35 IAC 830.203(a)(5).
Attachment 7	G.	All authorizations, permits and approvals required from each Bureau of the Agency have been applied for or obtained.
Page 15 Section 15	Н.	An operating plan satisfying the applicable requirements set forth in 35 IAC 830.206, a commitment to those applicable requirements and information to demonstrate how they will be achieved at the proposed facility.
Page 14. Section 4	I.	An early detection or groundwater monitoring system design in accordance with 35 IAC 830, Appendix A, if an early detection and groundwater monitoring program is required pursuant to 35 IAC 830.205(b)(1)(A)(iii) or 35 IAC 830.205(b)(2)(A)(iii).
Page 24. Section 6	J.	A salvaging plan if applicable, including markets, maximum storage volumes, storage times and nuisance controls.
Section 11. Att. 9	К.	A contingency plan satisfying the requirements set forth in 35 IAC 830.212.
Page 24, Section 8	L.	A load checking plan for inspection, removal of non-compostable waste from incoming loads or rejection of contaminated loads.
Page 15	Μ.	Specification of the operating hours of the facility.
Pages 1, 15	N.	The types of landscape waste that are proposed to be received by the facility.
Section 4, p10	0.	Descriptions of the storage areas, including their capacities, that will be used to stage the waste before processing and placement into windrows or piles, to store bulking agents or additives and to store end-product compost.
Section 9 Att. 9	Ρ.	Description of personnel training procedures satisfying the requirements of 35 IAC 830.210.
Page 22	Q.	Description of compost sampling and testing procedures to demonstrate compliance with 35 IAC 830 507 and 35 IAC 830 504 for the compost quality standards set forth in 35 IAC 830 503

9. Record Keeping:

Specify the location where the facility permit, design plans, operating plan, contingency plan, closure plan, reports and monitoring records will be kept so as to be available during inspection of the facility pursuant to 35 IAC 830.211. Describe the type of information that will be included in these records.

ation:

....cords and plans will be kept at the Kramer Tree Specialists, Inc. office at 300 Charles Court (see Drawing 1).

10. Closure Plan:

Provide a closure plan which contains a description of closure plans and methods to demonstrate compliance with all closure in irrements in 35 IAC, Part 830. The closure plan must contain the itemized steps which will be taken to close the facility iding a time line and cost estimate for labor equipment, reporting and certification of completion of closure.

Location:

Page 30, Section 12

11. Financial Assurance:

Provide a financial assurance plan containing a written cost estimate and identifying the financial mechanism chosen to cover the cost of closure. An operator of a new facility choosing to use a cash reserve account to cover the cost of closure shall fully fund the account within one year after initial receipt of waste.

Location:

Page 32, Section 13

12. Reporting:

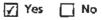
Describe the procedures that will be used to collect information and file an annual report with the illinois EPA by April 1st of each year. The annual report must include information on the amount of material in tons received for composting, the amount and type requirement marketed, the amount of material remaining on site and a certification of compliance with the financial assurance

jirements of 35 IAC, Subpart F.

Location: See Section 2, Page 5.

13. Public Notification:

A. Are a copy of the Notice of Application for Permit to Manage Waste (LPC-PA16) and a list of persons to whom it was sent, along with copies of the mailing receipt included with this application?



B. If this is for a new facility or an expansion, has a copy of the newspaper notice, the name and telephone number of the newspaper used, and the dates of publication been included? This information may be submitted up to 30 day s after the date the application is filed with the Agency.

🖌 Yes 📋 No

C. If this is for a new facility or expansion, has a copy of the "Notice of Application for Permit to Manage Waste form (LPC-PA16) been sent to owners of all real property within 250' in each direction of the tot line of the subject property, and a copy of the mailing receipts been included?

🖌 Yes 🗌 No

Page 5 of 5

14. Required Signatures:

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I hereby affirm that all information contained in this application is true and accurate to the best of my knowledge and belief. I do in swear that I am a duly authorized representative of the owner/operator and I am authorized to sign this permit application it.

Any person who knowingly makes a false, fictitious, or fraudulent material statement, orally or in writing, to the Illinois EPA commits a Class 4 felony. A second or subsequent offense after conviction is a Class 3 felony. (415 ILCS 5/44(b)}

Jaroh Kuanna	5-18-11
Ouph Kutemen Owner Signature:	Date:
Joseph Kramer J	President
Printed Name:	Title:
Notary: Subscribed and Swom before me this 18th day of .	Mary 2011.
My commission expires on: 9514	Theindia C Peters
∂	Signature & Stamp/Seal of Notary Public
Jaseph Krames	<u>5-18-11</u> OFFICIAL SEAL
	Date LUCINDIA C PETERS
Joseph Kramer Printed Name	President NY COMMISSION EXPRESSIONS/14
tary: Subscribed and Swom before me this 18th day of _	
My commission expires on: 9514	· P. I. A.D. I
OFFICIA LUCINDIA NOTARY PUBLIC - 1 MY COMMISSION Engineer's Name: John P Lardner	CPETERS Signature & Stamp/Seal of Notary Public
Company: JPL Environmental Engineering	Registration Number: 062038498
Street Address: 1122 North Clark Street #3803	PO Box:
City: Chicago State: IL	Zip Code: 60610-7899 Phone: 630-362-4287
Email Address: jlardnerpe@aol.com	License Expiration Date: 11-30-2011
Preparer's Signature: <u>John P. Lawner</u>	Date: <u>5/18/2011</u> Date: <u>5/18/2011</u> Sector <u>5/18/2011</u>
	KINO

a information submitted as part of the Application is available to the public except when specifically designated by the Applicant to be treated confidentially as a trade secret or secret process in accordance with Section 7(a) of the Act, applicable rules and regulations of the Illinois Pollution Control Board and applicable Illinois EPA rules and guidelines.

RE: Legal Notice for Publication

Page 1 of 1

From: legale <legals@dailyherald.com> To: John Lardner <jlardnerpe@aol.com> Subject: RE: Legal Notice for Publication Date: Thu, May 19, 2011 9:30 am

will do - Kathleen

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---Original Message---From: John Lardner [mailto:jlardnerpe@aol.com] Sent: Thursday, May 19, 2011 9:20 AM To: legals Subject: RE: Legal Notice for Publication

The schedule is good. Please proceed. John Lardner

From: legals Sent: Thursday, May 19, 2011 8:10 AM To: John Lardner Subject: RE: Legal Notice for Publication

John - I will publish 5/ 21, 28 & 6/4 and send the invoice and certificate to your attention - thanks, Kathleen

---Original Message----From: John Lardner [malito:ilardnerpe@aol.com] Sent: Wednesday, May 18, 2011 4:35 PM To: legals Subject: Legal Notice for Publication

We would like to have the attached notice published in the legal notice section of the Daily Herald newspaper, with circulation to the City of West Chicago. Publish once a week for three successive weeks, with proof of publication provided. Please advise on the cost for this service. Please direct response and billing to:

Mr. John P Lardner, PE JPL Environmental Engineering 1122 North Clark Street, #3803 Chicago, IL 60810-7899 630-362-4287 (cell)

Thank-you,

John Lardner

Kramer Tree Specialists, Inc. located at 300 Charles Court in West Chicago, Illinois in DuPage County is applying to the Illinois Environmental Protection Agency (IEPA) for a permit to operate a leaf mulch production facility. The permit seeks to create a leaf mulch production area on 5.5 acres within 10 acres of property owned by the operator and currently used for their tree care business and production of wood mulch. The entrance to the facility is from Charles Court via Washington Street. The facility will accept landscape waste consisting of brush, branches and leaves. The facility received a special use from the City of West Chicago on December 6, 2006 to construct an outside storage yard for processing and storage of mulch and landscape waste materials within an M zoning area subject to conditions in Ordinance No. 06-O-0102 . Questions regarding the application can be directed to Kramer Tree Specialists, Inc. at 630-293-5444.Comments can be directed to the IEPA in writing to the address below, or by phone, by June 27, 2011. Illinois Environmental Protection Agency Permit Section, Division of Land Pollution Control 1021 North Grand Avenue East, P.O. Box 19276

Springfield, II 62974-9276

(217) \$24-3300

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Bureau of Land • 1021 N. Grand Avenue E. • Box 19276 • Springfield • Illinois • 62794-9276

# Notice of Application for Permit to Manage Waste (LPC-PA16)

To Elected Officials and Concerned Citizens:

The purpose of this notice is to inform you that a permit application has been submitted to the Illinois EPA, Bureau of Land, for a solid waste project described below. You are not obligated to respond to this notice, however, if you have any comments, please submit them in writing to the Bureau of Land, Attn: Permit Section, at the above address, or contact the Permit Section at 218/524-3300 within 21 days.

# NOTE: Please complete this form online, save a copy locally, print and submit it to the Permit Section #33, at the above,

The permit application, which is identified below, is for a project described at the bottom of this page.

#### Site Identification:

| Site Name: Kramer Tree Specialis    | ts <u>, In</u> | c. Leaf Mulch Production | Facility | IEPA ID Number: (New)                  |              |
|-------------------------------------|----------------|--------------------------|----------|----------------------------------------|--------------|
| Street Address: 300 Charles Cour    | <u>t</u>       |                          |          | Р.О. Вох:                              | ····=        |
| ty: West Chicago                    | _,             | _ State: IL Zip Code: 6  | 0185     | County: DuPage                         |              |
| TYPE OF PERMIT SUBMISSIONS          | : ]            | YPE OF FACILITY:         |          | TYPE OF WASTE:                         |              |
| New Landfill                        |                | Landfill                 |          | General Municipal Refuse               |              |
| Landfill Expansion                  | $\Box$         | Land Treatment           |          | Hazardous                              |              |
| First Significant Modification      |                | Transfer Station         |          | Special (Non-Hazardous)                |              |
| Significant Modification to Operate |                | Treatment Facility       |          | Chemical Only (exec. putrescible)      |              |
| Other Significant Modification      |                | Storage                  |          | Inert Only (exec. chem. & putrescible) |              |
| Renewal of Landfill                 |                | Incinerator              |          | Used Oil                               |              |
| Development                         |                | Composting               |          | Solvents                               |              |
| Operating                           | $\Box$         | Recycling/Reclamation    |          | Landscape/Yard Waste                   | $\checkmark$ |
| Supplemental                        |                | Other                    |          | Other (Specify)                        |              |
| Transfer                            |                | Leaf Mulch               |          |                                        |              |
| Name Change                         |                |                          |          |                                        |              |
| Generic                             |                |                          |          |                                        |              |

### **Description of Project:**

Application to accept lanscape waste consisting of leaves in order to stack, store and process them into leaf mulch on 5.5 acres out of a 10 acre parcel located on the owner's existing tree care facility. Leaf mulch will be "voduced on an existing concrete pad that is also used for production of wood mulch at the facility.

IL 532-0334 LPC 040 Rev. 4/2010 This Agency is authorized to require this information under Section 4 and Title X of the Environmental Protection Act (415 ILCS 5/4, 5/39). Failure to disclose this information may result in: a civil penalty of not to exceed \$50,000 for the violation and an edditional civil penalty of not to exceed \$10,000 for each day during which the violation continues (415 ILCS 5/42). This form has been approved by the Forms Management Center.

Date: May 23, 2011

State Senator Thomas Johnson 1725 S Naperville Road, Suite 200 Wheaton, IL 60089

County Clerk Gary King Jack T. Knuepfer Admin. Bldg. 421 N. County Farm Road Wheaton, IL 60187

City Clerk Nancy Smith West Chicago City Hall 475 Main Street West Chicago, IL 60185

Tornado Innovation's Cleaning Systems 333 Charles Court, Suite 109 West Chicago, IL 60185

R. J. Lipscomb Engineering 1215 Washington Street West Chicago, IL 60185

< 1.</p>

City Clerk Heidl Wetzel 100 North Island Ave Batavia, IL 60510-1930

Village Clerk Beth Melody 500 N. Gary Avenue Carol Stream, IL 60188 State Representative Mike Fortner 135 Fremont Street West Chicago, IL 60185

States Attorney Robert Berlin 503 N. County Farm Road Wheaton, IL 60187

NIP Lot 2A LLC 2775 Norton Creek Drive West Chicago, IL 60185

Prairie Materials 7601 W. 79<sup>th</sup> Street Bridgeview, IL 60455

R.C. Coil Spring Mfg. Co. C/o Lee Development/West Chicago Os 020 Quail Run Court Winfield, IL 60190

Village Cierk Anne Mareachen 27 W 465 Jewell Road Winfield, IL 60190

City Clerk Nancy Garrison 2 East Main Street 5t. Charles, IL 60174 County Board Chairman Dan Cronin Jack T. Knuepfer Admin. Bldg. 421 N. County Farm Road Wheaton, iL 60187

Dona L. Smith, Township Supervisor 130 Arbor Avenue West Chicago, IL 60185

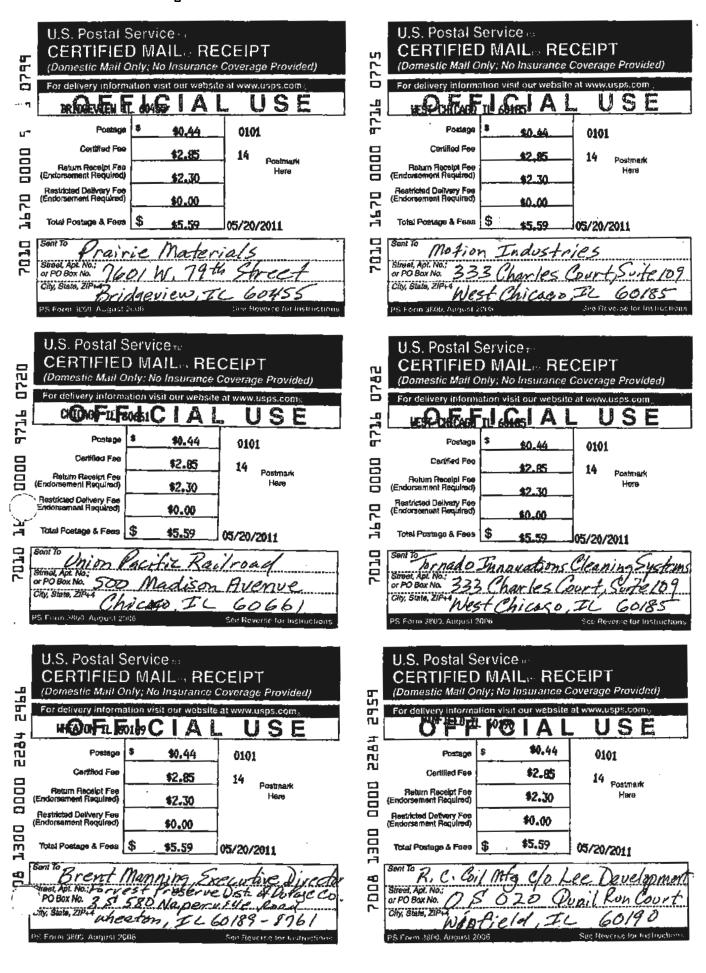
Motion Industries 333 Charles Court, Suite 109 West Chicago, IL 60185

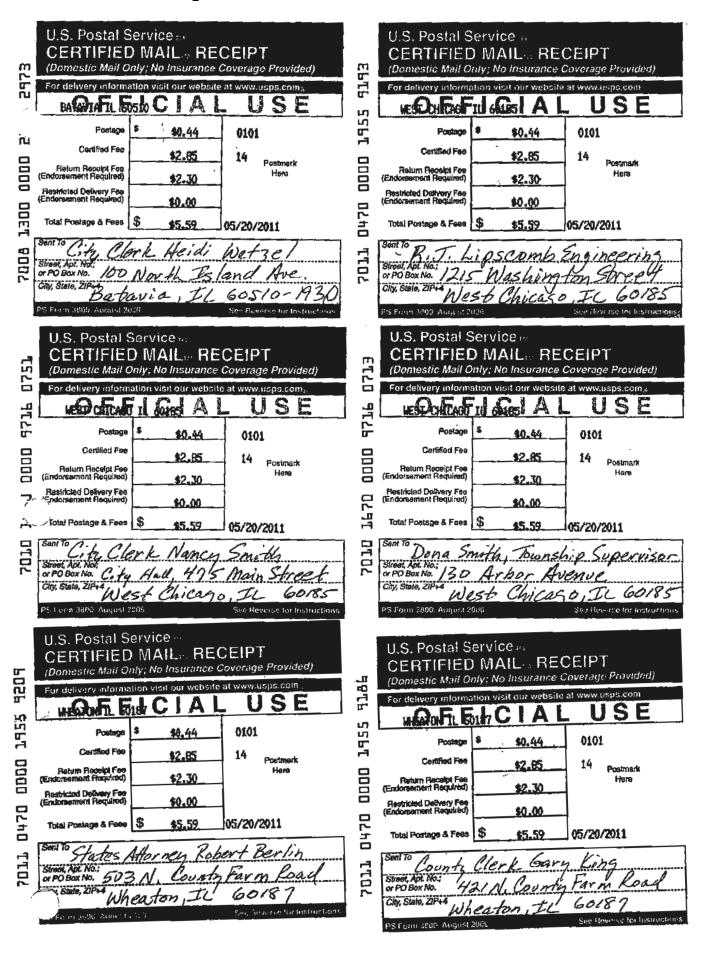
Union Pacific Railroad 500 Madison Avenue Chicago, IL 60661

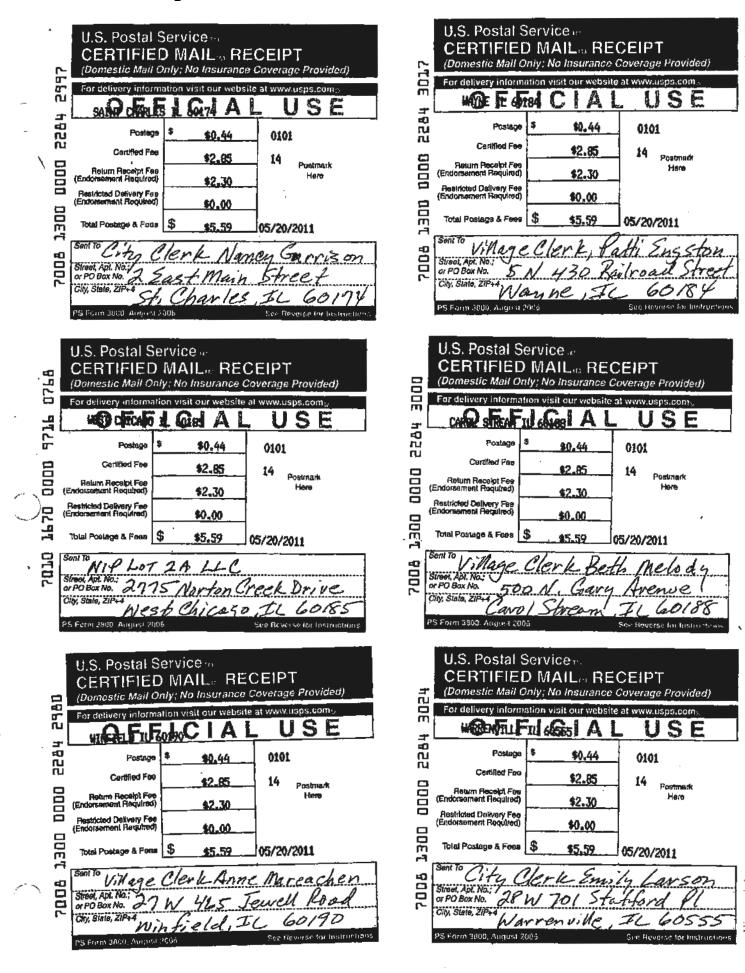
Brent Manning, Executive Director Forest Preserve District of DuPage County 3S 580 Naperville Road Wheaton, IL 60189-8761

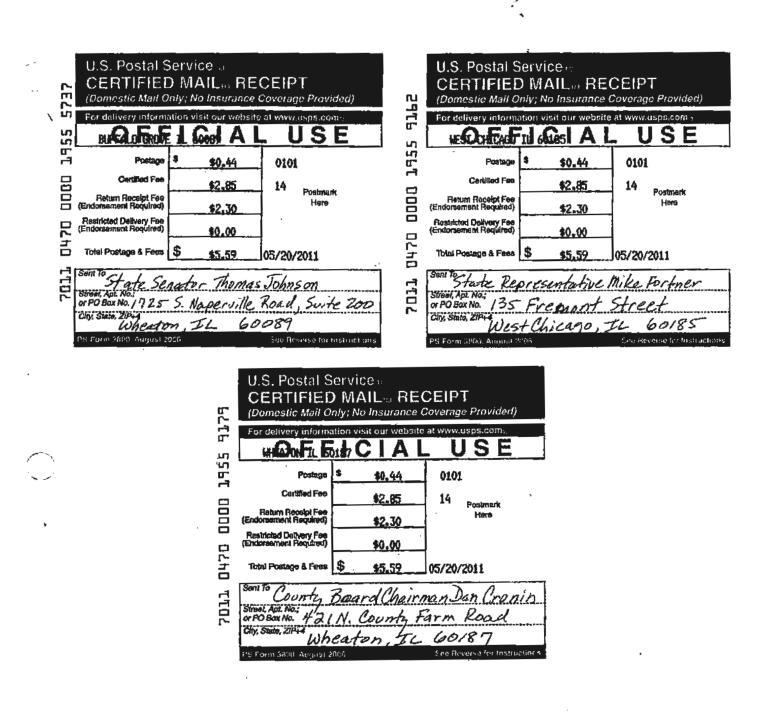
City Clerk Emily Larson City Hall 28W701 Stafford Pl Warrenville, IL 60555

Patti Engston, Village Clerk 5N430 Railroad Street Wayne, IL 60184









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May 2011

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2011-003

# PERMIT APPLICATION FOR A LANDSCAPE WASTE LEAF MULCH PRODUCTION FACILITY

KRAMER TREE SPECIALISTS, INC. WEST CHICAGO, ILLINOIS [PROJECT NO. 2011-003] MAY 2011

<u>For Submission to:</u> Illinois Environmental Protection Agency Division of Land Pollution Control Bureau of Land – Permit Section Springfield, Illinois

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| May 2011 | 2 | 2011-003 |
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| May 2011 |   | 2011-000 |
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### **KRAMER TREE SPECIALISTS**

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### TABLE OF CONTENTS

.....

\_ \_ \_ \_ . \_ . .

1

| SECT | ION                                                                                        |
|------|--------------------------------------------------------------------------------------------|
| 1.0  | INTRODUCTION4                                                                              |
| 2.0  | MINIMUM PERFORMANCE STANDARDS (830.202) AND LOCATION STANDARDS (830.203)                   |
| 3.0  | STORM WATER CONTROLS (830.204)                                                             |
| 4.0  | OPERATING STANDARDS (830.205)                                                              |
| 5.0  | OPERATING PLAN (830.206)15                                                                 |
| 6.0  | SALVAGING (830.207)                                                                        |
| 7.0  | ACCESS CONTROL (830.208)                                                                   |
| 8.0  | LOAD CHECKING (830.209)                                                                    |
| 9.0  | PERSONNEL TRAINING (830.210)                                                               |
| 10.0 | RECORDKEEPING (830.211)25                                                                  |
| 11.0 | CONTINGENCY PLAN (831.07)                                                                  |
| 12.0 | CLOSURE PLAN (830.213)                                                                     |
| 13.0 | SUBPART F: FINANCIAL ASSURANCE PLAN (830.601, 830.602, 830.603, 830.604, 830.605, 830.606) |
| ΑΤΤΑ | CHMENT 1:                                                                                  |
| US   | GS SITE MAP                                                                                |
| ATTA | CHMENT 2:                                                                                  |
| FIG  | URE 1 - USGS SITE LOCATION MAP                                                             |
| FIG  | URE 2: SITE ZONING/ LANDUSE MAP                                                            |
| SH   | EET 1: EXISTING CONDITIONS SITE PLAN                                                       |
| SH   | EET 2:PERMIT SITE PLAN                                                                     |
| ΑΤΤΑ | CHMENT 3: POTABLE WATER WELL LOCATION MAP                                                  |
| ΑΤΤΑ | CHMENT 4: FLOOD INSURANCE RATE MAP                                                         |
| ΑΤΤΑ | CHMENT 5: AERIAL PHOTOGRAPH OF NEAREST RESIDENCE                                           |
| ΑΤΤΑ | CHMENT 6: STORM WATER CONTROLS & SUPPORTING CALCULATIONS                                   |

JPL Environmental Engineering

| May 2011              | 3                            | 2011-003            |
|-----------------------|------------------------------|---------------------|
|                       | S DEPARMENT OF NATURAL RESOU |                     |
| ATTACHMENT 8: STORM   | WATER CALCULATIONS           |                     |
| ATTACHMENT 9 CONTING  | SENCY PLAN .:                | 43                  |
| ATTACHMENT 10: : ODOR | COMPLAINT FORM               |                     |
| ATTACHMENT 11 PILE TE | MPERATURE MONITORING FORM, P | LE EXCAVATION FORM, |
| CONTINGENCY IMPLEME   | NTATION PLAN                 | 45                  |
| ATTACHMENT 12 LEAF M  | ULCH QUANTITY REMOVED FORM   |                     |
| ATTACHMENT 13 PLAT OF | SURVEY & LEGAL DESCRIPTION   |                     |
| ATTACHMENT 14 OWNER   | SHIP DOCUMENTATION           |                     |
| ATTACHMENT 15: WIND R | OSE                          |                     |

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### May 2011

4

#### 2011-003

### 1.0 INTRODUCTION

A landscape waste leaf mulch production facility (LMPF) is proposed within the boundary of property owned by Kramer Land Development and leased to Kramer Tree Specialists, Inc. (KTS). The purpose of the facility is to collect, store and process leaves, brush and branches, generated from internal and external sources, for the production of leaf mulch. The leaf mulch is then marketed for sale to private contractors and municipalities. The application was the result of consultations with the Illinois Environmental Protection Agency (Agency) whereby the Agency stated the requirement for a permit under Section 830 Standards for Compost Facilities, or a permit under Section 807 Solid Waste, in order to collect, store and process leaves, and produce a mulch product from them.

The property controlled by the owners includes 10 (ten) acres within West Chicago, Illinois, DuPage County. The new LMPF will be located as illustrated on drawing Sheet 2 in Attachment 2. It will encompass approximately 5.5 acres within the overall property controlled by the owner. The application contained herein is a demonstration that the facility meets the standards of 35 IAC Part 830 subject to; the minimum performance standards in Subpart B, Section 830.202, the location standards in Section 830.203, the additional operating standards and requirements in Sections 830.204 through 830.213; and the financial assurance requirements of Subpart F. The application follows the sequence of sections in the regulations and includes information attachments as necessary to support the demonstrations. The end-product quality standards of Subpart E do not apply to this application because only leaf mulch is produced and there will be no finished compost produced.

### 2.0 PERFORMANCE STANDARDS (830.202) AND LOCATION STANDARDS (830.203)

### Performance Standards

Separate plans have been prepared in later parts of this application that demonstrate that the applicant will comply with the requirements of 35 IAC Part 830, Subpart B, Section 830.202.

May 2011 5 2011-003

The operator will post a permanent sign at the entrance along Charles Court at the entrance, and the text will specify in letters not less than three inches high, the following information:

- 1) The name and mailing address of the operation which is Kramer Tree Specialists, 300 Charles Court, West Chicago, Illinois.
- The operating hours which will be from Monday through Saturday from 5:30 am to 6:00 pm.
- The materials which can be accepted shall include only organic landscape waste limited to brush, branches and leaves.
- 4) The statement "COMPLAINTS CONCERNING THIS FACILITY CAN BE MADE TO THE FOLLOWING PERSONS", which will be followed by the name and phone number of the operator, and the name and telephone number of the Bureau of Land, Illinois Environmental Protection Agency, Springfield, Illinois

The operator will submit a written annual statement to the Agency, on a form provided by the Agency, on or before April 1 of each year that includes:

- A) An estimate of the amount of leaf material in tons or cubic yards, received for production of leaf mulch in the previous calendar year;
- B) An estimate of the amount and disposition of leaf mulch material in the previous calendar year;
- C) A Facility Financial Assurance Plan Compliance Certification.

### Location Standards

1 The proposed LMPF is more than 200 feet from the nearest potable water supply well, which is located east of the property as shown in the Potable Water Well Location Map (Illinois Geological Survey) included in **Attachment 3**. Other nearby potable water well locations, and their well location diagrams, are also included in the attachment.

<u>May 2011 6 2011-003</u>

- A copy of the current Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) is included in Attachment 4. The LMPF location is not within the 10-year or 100-yr floodplains.
- 3. An aerial photograph of the site, showing the proposed LMPF and the nearest residences, is included in Attachment 5. The site is more than 1/6<sup>th</sup> mile from the nearest residence. The nearest residence is located approximately 2500 feet east of the facility boundary as illustrated on the map in Attachment 5 and on Figure 1 in Attachment 2. There are no facilities that meet the description of 830.203, 3(A), (B) and (C) within 1/8<sup>th</sup> mile of the site.
- 4. A map of areas within ½ mile of the facility boundary is also included on Figure 2 in Attachment 2. The map illustrates the types of land use immediately adjacent to the facility and the zoning classification of properties. The property for the proposed LMPF is zoned Manufacturing and has been granted a Special Use, by ordinance, to construct an outside storage yard for the processing and storage of mulch and landscape waste materials. A copy of Ordinance No. 06-O-0102 from the City of West Chicago is included in Attachment 6.
- 5. The site is not located within 1/4 mile of the nearest residence as shown on the aerial map in **Attachment 5**. The site is therefore not subject to Section 830.203(4).
- The location used for storage and production of leaf mulch is entirely situated upon a concrete surface. At no time is the material in contact with the ground surface. Therefore, piezometers were not installed to determine the water table distance from the concrete pad surface as required by Section 830.203 (5).
- There is no Wild and Scenic River located near the site, therefore, the proposed site will meet the requirements under the Wild and Scenic Rivers Act as per Section 830.203(6).
- 8. The LMPF will not restrict the flow of the 100-year flood because the proposed facility is located outside the limits of the 100-year floodplain (Section 830.203(7)).
- 9. The Illinois Department of Natural Resources (IDNR) EcoCAT database was consulted. A determination of endangered species or critical habitat was performed using the EcoCAT database. Results of the database search are included in

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7

<u>May 2011</u>

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2011-003

Attachment 7. The IDNR concluded that adverse effects are unlikely. The proposed LMPF pad and adjacent office building have been constructed, therefore the Illinois Historic Preservation Agency was not consulted to assess whether or not the facility is located in an area where it may pose a threat of harm or destruction to features such as a historic or archaeological site, natural landmark or natural area as described in Section 830.203 (8)

10. Figure 1 of Attachment 1 contains a USGS site location map outlining the facility permit area and all adjacent property extending ½ mile beyond the property boundary.

8

May 2011

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13

<u>2011-003</u>

### 3.0 STORM WATER CONTROLS (830.204)

The LMPF pad has been designed and constructed such that run-on will be diverted around the perimeter. Precipitation falling directly on to the pad is the only runoff that will be generated from the active leaf mulch production area. Surface water runoff from the facility, resulting from precipitation less than or equal to the 10- year, 24 hour precipitation event, will be controlled so as not to cause or contribute to a violation of the Act. The City of West Chicago (City) requirements are equal to, or more stringent than, these requirements and require storm water detention for runoff from a 100 year, 24 hour precipitation event. The City also requires storm sewer collection and discharge pipe structures to be designed to control a 10-year, 24-hour storm. The storm water detention basins that serve the proposed leaf mulch production area are Ponds 3 and 6 on the site drawings, Sheets 1 and 2 in Attachment 2. The entire concrete pad is approximately 5.55 acres, with 0.96 acres of the pad draining toward Pond 3, and 4.59 acres draining to Pond 6. These basins and the incoming storm sewer pipes were constructed to meet the City ordinance requirements. Detailed analyses and design calculations are included in Attachment 8. The storm water detention pond calculations were performed by SPACECO, Inc. for the site developer, Lee Development Corporation. The storm sewer calculations were prepared by Peter F. Olson (now AMENT, Inc.) for the site construction contractor, Triad Construction Services, Inc.

a. Storm water or other water which comes into contact with the interior piles of landscape waste that is received, stored, processed or mulched, or which mixes with landscape waste leachate, will be considered landscape waste leachate and will be re-circulated into the pile, collected and properly disposed of off-site, or treated as necessary prior to discharge off-site to meet applicable standards of 35 III. Adm. Code Subtitle C.

Surface water runoff from the concrete pad is collected at each of the drainage inlets shown on Sheets 1 and 2. Shallow runoff diversion barriers, such as sand bags or filter socks, will be placed at the toe of the leaf mulch piles in order to collect any leachate draining from within the pile. During heavy precipitation events, surface water runoff will flow directly to the storm drain inlets. For less intense precipitation events, most will be absorbed by the stored and processed leaves. A small portable collection pump will be operated by Kramer Tree Specialists to collect leachate that accumulates from within the leaf storage and mulch piles. It will then be re-circulated

JPL Environmental Engineering

| May 2011 | 9 | 2011-003 |
|----------|---|----------|
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into the pile, or discharged to a waste water treatment facility. Except during large precipitation events, surface water runoff that comes in contact with leaf mulch will not be allowed to leave the Kramer Tree Specialists property without treatment. In general, the stored and processed leaf piles will be stacked as steep as possible to maximize runoff and prevent moisture infiltration.

- b. Ponding of landscape waste leachate within the leaf mulch production area will be prevented by positioning orderly and well-maintained runoff collection barriers and removing the accumulated water in a timely manner. The pad was constructed with sloping surfaces to each of the catch basins to maintain effective removal of storm water during heavy precipitation events. Each catch basin is served by a reinforced concrete drainage pipe to convey storm water into the detention ponds.
- c. The concrete surface used for leaf mulch production is a non-porous material that will dry quickly after surface water runoff is collected, and then discharged from it.

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May 2011 10 2011-003

### 4.0 OPERATING STANDARDS (830.205)

The proposed LMPF will comply with the following operating standards in addition to those set forth in Sections 830.202 and 830.204:

- a. Leaf Mulch Process
  - 1. The LMPF will meet the following leaf mulch process standards:
    - A. Landscape waste approved for storage and processing at the site will be stored within 24 hours after receipt at the facility by stacking into piles.
    - B. The operator shall take measures to maintain the pile density in order to inhibit aerobic decomposition.
    - C. The operator shall take measures to minimize moisture infiltration by keeping the outward slope as steep as possible while maintaining stability of the pile.
    - D. Landscape waste entering the site will be delivered to the designated leaf mulch production area of the concrete pad. The staging area is illustrated on Sheet 1 in Attachment 2. The size of the staging areas may vary depending on the volume of leaves accepted at the facility. In general, the leaf piles will be no more than twenty-five (25) feet in height with an outward slope of less than 1 vertical to 1 horizontal (1V:1H) or less depending on the stability of the stored and processed leaves. During removal of the processed leaves after storage in the piles, site operators will follow Standard Operating Procedures (SOP's) established by Kramer Tree Specialists.
    - E. Decomposing material will not be mixed with end-product leaf mulch ready to be sold or offered for use. Chipped tree limbs and trunks, and shredded wood waste, may be added to the processed leaves in order to create another mulch product for sale.
    - F. Sufficient equipment and personnel will be available at the site to stack and store incoming volumes of landscape leaf waste within the required

| <u>May 2011</u> | <br>11 | 2011-003 |
|-----------------|--------|----------|
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timeframe stipulated in Section 830.205. Personnel associated with the mulch yard at KTS are available during the operating hours of the LMPF.

- G. Written authorization from the Agency will be obtained prior to use of any additives. Additives to the processed leave are not planned for the production of leaf mulch.
- Each affected portion of the pile will be turned if temperatures in the pile exceed 180 degrees Fahrenheit, indicating that degradation is taking place. The piles of stored and processed leaves will be maintained to prevent infiltration of moisture and air that can sustain degradation of the leaves.
- The LMPF is not being operated as a contained leaf mulch production facility. Therefore, no mechanisms to control moisture, air flow and air emissions pertaining to the operation of a contained facility will be constructed.
- 4. The mulch production process involves storing the leaves and processing them in their original condition when they are needed for seasonal use in landscaping. Therefore, applicable thermal processing to reduce pathogens is unnecessary.
- b. Processing and Storage Surface
  - 1. Open Processes

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- A. Leaf Mulch Production areas:
  - i. The proposed leaf mulch production area will be constructed on a continuous slab surface of reinforced concrete with a minimum thickness of approximately eight (8) inches.
  - ii. The proposed leaf mulch production area design will manage run-on and run-off water from the landscape waste in accordance with 830.204. All-weather hard surface access roads into the site have been constructed to allow the site to operate during changing weather conditions.

JPL Environmental Engineering

 iii. Early detection and groundwater monitoring, pursuant to 830.205(b)(1)(A) or 830.205(b)(2)(A), will not be required because no portion of the leaf mulch production will be located on bare ground.

8. The leaf stacking and storage area, and leaf mulch storage surface, will be constructed and maintained such that:

- As shown on Sheet 1 in Attachment 2, run-on waters are diverted away from the leaf mulch production facility as a result of the grading performed during construction of the concrete pad;
- Runoff waters and landscape waste leachate will be managed in accordance with Section 830.204; and
- iii. The facility will operate during all weather conditions.
- C. As shown on Sheet 2 in Attachment 2, all surfaces of the proposed leaf mulch production area will be located on a concrete pad with slopes to prevent ponding of surface water runoff.
- All utilities necessary for the safe operation of the LMPF already exist at the adjacent KTS shop facility, and are available for use
- d. The owner will maintain and operate all systems, related appurtenances and structures for the proposed facility as described in Section V: Operating Plan.
- e. Open burning will not be allowed at the Kramer Tree Specialists LMPF.
- f. Dust will be minimized by keeping the access roads and travel paths between piles free of mud and debris, and by watering access roads as needed. Dust emissions from leaf mulch production operations will be controlled by spraying with irrigation water and orienting the piles to minimize wind exposure.
- g Noise levels in the proposed leaf mulch production area will be kept as low as reasonably achievable using methods presented herein. Noise will be controlled through the use of mufflers on all vehicles to be used at the LMPF. Maintenance of vehicles will insure that excessive noise is kept to a minimum. Provided that

| May 2011 | 13 | 2011-003 |
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equipment is kept in good repair, the active work areas will have adequate separation distance from nearby noise receptors.

- h. Vectors will be controlled, so as not to cause or contribute to a violation of the Environmental Protection Act. Problems associated with rodents will be corrected using a licensed extermination contractor who will visit the site and provide traps and other measures for controlling rodents. Insect populations will be corrected by eliminating the source of their propagation and by selective use of pesticides or fly strips. Mosquitoes will be kept to a minimum by preventing standing water to accumulate.
- i. On-site fire protection measures will include maintaining firefighting equipment and telephone access to the West Chicago Fire Protection District (District). The District maintains a fire station less than two miles from the proposed LMPF. Fire extinguishers will be provided at the on-site equipment maintenance building. Fire contingency measures are detailed within the Site Safety Contingency Plan in Attachment 9.
- j. The LMPF will be patrolled daily for the retrieval of litter that may result from stacking, grinding and leaf mulch production activities. Retrieved litter shall be placed in a secure container at the equipment maintenance and office building for later disposal. Any litter that may escape the facility boundaries will be collected and disposed of properly by laborers employed in the operation of the mulch yard.
- Management procedures for the collection, containment and disposal of wastes that are received and deemed unsuitable for mulch production are detailed in Section V: Operating Plan (f) of this application.
- 1. The existing hard surface access roads will be used to prevent mud tracking from the proposed facility. Mud tracked along the entrance roads will be cleaned by Kramer Tree Service.
- m Monitoring:

Monitoring procedures are described in detail in Section V: Operating Plan (k).

1. For each of the piles located on the Kramer Tree Specialists LWCF property:

- A. The temperature of each pile of stored and processed leaf material will be monitored on a minimum weekly basis.
- B. The piles will be maintained to limit oxygen infiltration that will initiate the degradation of the processed leaves. Therefore the oxygen level of each pile of stored and processed leaf material will not be monitored.
- The Kramer Tree Specialists LMPF will not be operated as an in-vessel continuous feed system. Therefore, Section 830.205, Part m, subpart 2, does not apply.
- Early detection and groundwater monitoring, pursuant to 830.205(b)(1)(A) or 830.205(b)(2)(A), will not be required as a result of establishing a working pad surface constructed entirely of concrete.

25

May 2011 15 2011-003

### 5.0 OPERATING PLAN (830.206)

The following Operating Plan defines the methods that will be used by Kramer Tree Specialists to manage landscape waste received at its facilities in compliance with 35 IAC 830, 831, and 832. By following this Plan, KTS ensures both compliance with the aforementioned regulations and a consistent high quality end product. This Plan is also intended as a guideline for current personnel and as a training document for new employees.

This facility's operating hours are:Monday through Friday:5:30 am to 6:00 pmSaturday:5:30 am to 6:00 pm

- a. The facility will be operated, maintained, and controlled by the director of operation, yard manager, and the equipment operators and laborers employed at Kramer Tree Specialists. The mulch yard manager is Tim Peters and the operations director is Rick Thomas.
- b. A description of the anticipated quantity and variation, throughout the year, of landscape waste to be received is as follows:

This facility can accept a maximum volume of 30,000 cubic yards of leaf landscape waste per year for production of leaf mulch, utilizing the area illustrated on **Sheet 1** in **Appendix 2**. The concrete mulch processing pad area consists of approximately 5.5 acres. The active leaf mulch production period for the leaf piles is approximately ten (10) months (October through July). The space allocated for storage of leaves is 5.5 acres, of which some will be used for the production of leaf mulch and the remainder for wood mulch. Therefore, the average throughput of leaves for this facility is 30,000 cubic yards, which produces approximately 20,000 cubic yards of leaf mulch after processing.

During the life of the proposed LMPF, the capacity will range up to the maximum amount presented in this section, with the variation a result of the actual acreage utilized for leaves and leaf mulch storage in the operations, and seasonal fluctuation in leaf landscape waste generated The seasonal quantities of the landscape leaf waste accepted for mulch production will vary throughout the fall.

| May 2011 | 16 | 2011-003 |
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The outcome of seasonal quantity of leaf landscape waste will be determined by the landscape maintenance and construction companies and municipalities that use the site.

c. The Methods for measuring incoming waste are as follows:

Daily Records will be kept by the Site Yard Manager, using a site ticketing program and database to track the volume of incoming leaf landscape waste that is received and the volume of sold finished leaf mulch. Daily Records will be kept as a backup to the site program and as a readily accessible account of the status of the facility. Methods for measuring incoming landscape waste are described in further detail in Section 10 Recordkeeping and Reporting.

d. Methods to control the types of waste received, in accordance with Section 830.209, and methods for removing, recovering and disposing of non-mulching materials, in accordance with Sections 830.205(k), 830.207 and 830.209, are as follows:

This facility will only accept leaf waste within the definition of landscape waste as described in Section 830.102. A Site Yard Monitor will inspect incoming loads arriving at the staging area. Loads will be inspected for extraneous unwanted materials inconsistent with leaf landscape waste and those with malodors. The Site Yard Manager will be responsible for entering load information onto a form that will be later entered into the database. The load form will contain information on the volume of leaves, and if applicable, the customer information. The Site Yard Monitor will be trained in the management of unacceptable loads and will follow the Operating Plan in the event that an unacceptable load is presented. Once the load information is collected, the vehicle will be instructed to unload.

 Methods to control traffic and to expedite unloading in accordance with Section 830 205(a)(1)(D) are as follows:

All vehicles entering the facility must do so through the main entrance gate off Charles Court which is locked at all times. After checking-in at the ticket office, they will be allowed to proceed through the gate and into the staging area. The entry gates to the KTS property will also be locked during non-operating hours <u>May 2011</u>

17

2011-003

The Site Yard Monitor will make every effort to ensure that trucks entering and leaving the facility are instructed to proceed to and from the staging area in a safe and organized fashion. Traffic may be controlled by the use of road signs, pavement markings and traffic cones to indicate areas of caution, direction to the staging area, exits and speed limits. All site personnel will be instructed to ensure that vehicles entering and exiting the facility are doing so in a safe and organized manner. Inappropriate speeds and maneuvers will be documented and frequent occurrences may be grounds for excluding a customer from the facility.

- f. Management procedures that will be used in leaf mulch production will include:
  - Landscape leaf waste entering the site will be delivered to the designated staging areas on the concrete pad and then stacked into piles within 24 hours after receipt.

The staging area is located within the property leased by the operator that encompasses the proposed mulch yard area. The current staging area is illustrated on **Sheet 1** in **Attachment 2**. A Site Yard Monitor trained to inspect incoming leaf landscape waste will staff the staging area. The staging area will be used for depositing of leaf landscape waste prior to pile formation. If the load is discovered to contain a large amount of unusable, non-organic material incapable of being used for mulch, the load may be rejected at the staging area and removed by the driver of the vehicle. Plastic bags, whether degradable or not, are to be removed by the individual delivering the load and will be discouraged from being accepted. In the event that incidental materials are inadvertently received, these materials are to be removed and disposed of offsite. Roll-off boxes will be provided on the property for this purpose.

Stacking of leaf landscape waste will take place in the staging area to; reduce the amount of non-organic material that is not capable of being used for mulch; reject unsuitable materials in order to make the end product more attractive and marketable; speed up the delivery process; and provide quality control of materials placed into piles. Each load will be segregated and then stacked based on the volume content.

| May 2011 18 2011-00 |
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Processing for size reduction of incoming leaves for leaf mulch production will be performed using a portable horizontal grinder such as a Vermeer HG-6000, or other similar machine. Size reduction will enhance the storage of the processed leaves as leaf mulch.

2. Leaf landscape waste processed in the staging areas of the proposed leaf mulch production facility will be stacked into piles approximately twenty-five (25) feet in height. The length of the piles will vary according to their location within the leaf mulch production area. Sufficient space, approximately ten (10) feet to twelve (12) feet, will be maintained between piles for unobstructed maneuvering of vehicles and equipment. The pile heights will be constructed based on climate conditions and to a size that increases compaction of the processed material. Piles will be oriented so as to minimize the exposed face in the predominant wind direction in order to minimize wind born movement and will be approximately 120 feet wide. A front end loader with bucket attachment or a conveyor stacker will place leaf landscape waste into piles of various lengths depending on orientation on the pad. The front end loader will be used to turn the piles if temperatures rise to 180 degrees Fahrenheit and the material degradation process has initiated.

The existing LMPF facility has a capacity to store approximately 30,000 cubic yards of incoming leaf landscape waste per year. This volume of leaves will produce approximately 20,000 cubic yards of leaf mulch.

A finished product storage area has also been delineated on plan Sheet 1 in order to illustrate their current location. The curing area consists of a pile approximately 25 feet tall by 75 feet wide by 75 feet long, to hold approximately 3,000 cubic yards of processed leaves as leaf mulch. As the leaves are processed to create mulch, and stacked into a finished mulch pile, they will be used immediately (within 5 to 7 days) by the operator. A minimal end product storage area is shown because the finished mulch is used immediately for sale to commercial landscape companies and municipalities.

Signs mounted on a wood post and anchored in a concrete 5 gallon container will be placed at the locations of the leaf storage pile and the finished leaf mulch

120

| May 2011 | 19 | 2011-003 |
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storage pile. These signs will be moved as necessary to identify the leaf mulch production areas within the footprint of the 5.5 acre concrete pad.

- 3. Written authorization from the Agency will be obtained prior to use of any additive, other than water.
- 4. The proposed LMPF facility will have an initial capacity to handle approximately 30,000 cubic yards of landscape waste per year assuming an initial working area of 5.5 acres and that one (1), 300-day leaf collection, storage and processing cycle can be completed from October to July of the following year.
- g. The methods to minimize odors in addition to the requirements specified in 830.202(e) include:
  - 1. A management plan for bad loads:

In the event a load arrives at the gate emitting objectionable odors, the Site Yard Monitor will reject the load if he/she determines that the load cannot be managed with prompt processing into a pile due to the quantity or the quality of the material in question, wind direction and speed, and the extent of the odors.

If a vehicle arrives at the staging area and objectionable odors are detected as the load dumps, the Site Yard Monitor will reject the load.

A record of rejected loads will be kept with the Site Yard Manager and customers who repeatedly deliver bad loads will be warned and possibly banned from the facility.

2. Operation during all weather conditions:

In order to keep leaf piles from decomposing and becoming anaerobic, operations need to be completed during all types of weather conditions. To accomplish this, personnel will be supplied with rain gear and equipment will be properly enclosed to protect operators from the elements. The facility will be appropriately staffed throughout the leaf generating months of the year to accommodate the incoming raw landscape leaf waste material. Personnel requirements at the facility will vary with the season. Additional operators will be

| May 2011 | 20 | 2011-003 |
|----------|----|----------|
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added during peak seasons. A designated area near the staging area will be reserved for placement of leaf landscape waste during wet weather if the material cannot be immediately stacked.

3. Odor complaint procedures:

The LWCF will have a permanent sign that will instruct the public to direct their complaints to both the operator and the IEPA. KTS employees receiving an odor complaint should follow the following procedures:

- a. Record and report to IEPA, within 24 hours after receiving the odor complaint, the following information, if it is volunteered upon request: (1) the date and time received; (2) the name of complainant; (3) the address and phone number of complainant; and (4) the name of the employee receiving the complaint.
- b. Record and report to IEPA within seven days: the date, time and nature of any action taken in response to an odor complaint.
- c. An example of this form is included in Attachment 10.
- 4. Additional odor-minimizing measures:

Anaerobic conditions occur when the decomposition process has begun and oxygen is depleted from the pile. This results in the demise of aerobic bacteria that use oxygen in the degradation process. When these bacteria are removed from the process, anaerobic bacteria begin to flourish. Anaerobic bacteria produce ammonia and methane gases from carbon and nitrogen sources contained in the raw material.

The best method for preventing a leaf pile from becoming anaerobic is to ensure that only leaves are added and that they are stacked to maximize density. The piles must be maintained to reduce moisture and oxygen infiltration. Green materials, such as grass clippings, have a high nitrogen ratio that contributes to the formation of ammonia. Materials like this need to be avoided in the stacked leaf material. To maintain the integrity of the mixture, site personnel will monitor the temperature of each pile on a regular basis as defined in the Operating Plan.