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Monitoring data assists in determining if temperatures pose a risk of a fire hazard. If high temperatures are noted, the location will be isolated, excavated and allowed to cool. The goal is to minimize heat generation during the stacked leaf storage period.

Pile dimensions at the Kramer Tree Specialists LWCF are designed to be compatible with their standard operating equipment, and will normally range less than 25 feet in height.

Despite careful monitoring of temperature, piles may emit odors if being excavated to reduce high temperatures. Operators should use the following methods in this situation.

- a. Estimate the odor potential of each pile based on heat content and age of the pile. Be prepared with odor neutralizing agents such as approved chemicals or use the material immediately as mulch.
- b. Use available on-line weather data sites to determine the direction and wind speed. Excavate piles when wind speeds are higher and wind direction is away from sensitive and more populated areas.
- c. Excavate piles during cooler parts of the day. Early morning and late afternoon are usually coolest
- Methods to control storm water and landscape waste leachate in accordance with section 830 205 are demonstrated in Section 3: Storm Water Controls of this application
- Methods to control noise, vectors and litter, in accordance with section 830.205 are demonstrated in Section 4¹ Operating Standards (g,h,j) of this application.
- j. Methods to control dust emissions in accordance with Section 830.205 (f) are demonstrated in Section 4: Operating Standards (f) and Section 11: Contingency Plan (a)(6) of this application
- k Methods for monitoring temperature oxygen level and moisture level of the leaf landscape waste material in accordance with Section 830 205 (a) are as follows:

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Only temperature will be monitored because the processed leaf storage piles will be maintained to minimize oxygen and moisture content, and these parameters are not important to the quality of processed leaf material when used for mulch production.

A pile monitoring program is essential to maintain optimum temperature and density that will produce a high quality product and prevent the formation of decomposed leaves. The program for the KTS site will require that temperatures be measured on a weekly basis, using an appropriate probe. on all formed piles

A Recordkeeping Plan will be maintained as a guide for managing the piles. Temperature probes will be inserted into the pile at a depth of three to four feet, and the readings will be confirmed every 75 feet along the length of the pile. These measurements will used to indicate times when maintenance, such as cooling of the pile, is required. When the temperature in the pile is greater than 60°C, conditions warrant action.

Monitoring of this parameter plays an important role in producing leaf mulch. Methods for adjusting temperature of the stored material, in accordance with Section 830.205 (a), are to cool the pile. This can be accomplished by excavating the pile or adding water.

- I. Recordkeeping and reporting procedures pursuant to Section 830.211 are demonstrated within Section 10; Recordkeeping of this application.
- m. Methods to obtain composite samples and test end-product:

1. Determination of Finished Product

A leaf mulch pile is maintained to preserve the processed leaves in their original state prior to sale as a mulch product. The material is used when seasonal demand warrants excavation of the stored leaves for use in the mulch production process.

2. Classification of Compost (830.502):

The stored processed leaves and final mulch products do not have classification or testing methods associated with their production, sale and end use. Kramer

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Tree Specialists requests that the testing requirement of Section 830.502 be waived for the production and sale of blended leaf mulch.

3. Performance Standards for General Use Compost (830.503)

Kramer Tree Service will not produce compost at the Mulch Yard. The following standards will be applied to the blended leaf mulch product that is produced for sale:

General Use Mulch:

- a. Must be free of any materials which pose a definite hazard to human health due to physical characteristics, such as glass or metal shards.
- b. Must not contain man-made materials larger than four millimeters in size exceeding 1% of the end product multiplication on a dry weight basis.

4. Testing Requirements for End Product Compost Derived from Landscape Waste (830.504)

Standards do not exist for blended mulch produced with processed leaves. Kramer Tree Specialists requests that the testing requirement of Section 830.504 be waived for the production and sale of blended leaf mulch.

5. Sampling Methods (830.507)

Kramer Tree Specialists requests that the sampling methods requirements of Section 830.507 be waived for the production and sale of blended leaf mulch.

6. Plans for Use of Finished General Use Compost

Blended leaf mulch will be offered to wholesale markets by Kramer Tree Specialist, such as landscape contractors and to municipalities, for general use in mulching applications. Kramer Tree Service already has a market base for which to utilize the end product.

7. Off-Specification Compost (830.508)

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All of the blended leaf mulch product will be offered for sale. In the event that blended leaf mulch does not meet customer specifications, it will be screened

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and reprocessed, or disposed of at a facility permitted to use it for production of compost.

6.0 SALVAGING (830.207)

Salvaging will not be allowed at the Kramer Tree Specialists LWCF.

7.0 ACCESS CONTROL (830.208)

All vehicles entering the facility will do so through a secured main entrance gate off of Charles Court and will proceed to the staging area. The entry gates to the LWCF will be locked during non-operating hours. The gates are shown on **Drawing 1** in **Attachment 2** and are also secured during times of operation. The Site Yard Monitor will make every effort to ensure 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.

The concrete road surface will reduce the potential for mud to be tracked onto the public roadways. Should mud accumulate on the roadways belonging to the public or the facility, it will be removed by KTS equipment.

Access routes that are not gate-restricted into the facility from Charles Court, are restricted by a six (6) feet high chain link fence and a four (4) feet tall concrete jersey block wall. Access from the adjacent properties is restricted using in-place vegetated buffers on the north, south, east and west.

8.0

LOAD CHECKING (830.209)

a. A Site Monitor will inspect incoming loads arriving at the staging area, located within the mulch yard. Loads will be inspected for extraneous unwanted materials inconsistent with landscape waste and undesirable malodors. The Site Yard Monitor will be responsible for entering load information into the database and printing a load ticket. The load ticket will contain information on the volume of material, the type of material and customer information.

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b. The Site Yard Monitor will be trained in the management of unacceptable loads and will follow the LMPF Operations Contingency Plan and Odor Minimization Plan in the event that an unacceptable load is presented. Once the load information is collected, the vehicle will be instructed to unload at the staging area.

9.0 PERSONNEL TRAINING (830.210)

The operator of the LMPF will provide training to all personnel prior to initial operation of the facility. In addition, annual personnel training will be provided which will include, at a minimum, a thorough explanation of the operating procedures for both normal and emergency situations. KTS maintains a Standard Operating Procedure for an annual Spring orientation meeting for employees of the mulch yard. This procedure in included as **Attachment 9, Appendix E**.

- a. New employees shall be trained, prior to participating in operations at the facility, in facility operations, maintenance procedures and safety and emergency procedures relevant to their employment.
- c. The operator will have personnel sign an acknowledgement stating that they have received the training required pursuant to this section.
- d. The facility operating plan required pursuant to Section 830.206 will be made available and explained to all employees.

Samples of Standard Operating Procedures for training of KTS personnel are included in Attachment 9

10.0 RECORDKEEPING (830.211)

The following methods outline the procedures used to comply with 35 IAC 830 211, which requires all facilities to develop recordkeeping procedures for operations. This regulation also requires that each facility keep copies of facility permits operating plans and required reports on-site for inspections.



 Copies of permits reports and inspections will also be kept at the Kramer Tree Specialists main office located at:

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300 Charles Court West Chicago, Illinois 60185

- b. The operator will record the following information:
 - 1. Quantity of each load of leaf landscape waste received and quantity of end product removed:

The volume of all loads received will be entered into the company's computer database and a hard copy record will be printed. Additionally, the Site Yard Monitor may track incoming volumes on a spreadsheet or other digital format.

2. Dates of Excavation or Watering of a Pile:

Attachment 11 contains the pile cooling form.

3. Pile Monitoring Data:

Attachment 11 contains the form used to track temperature monitoring data.

4. Conditions evaluated:

Conditions evaluated relevant to the items in Section 830.206 will be documented and summarized in a daily report prepared by the operator.

5. Odor Complaint Records:

Attachment 10 contains the Odor Complaint Reporting Form.

6. Record Of Any Event That Results In Implementation Of Contingency Plan:

Attachment 11 contains the form for reporting the activation of the Contingency Plan for emergency situations.

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7. Sampling and Testing Records and Results

There is no existing sampling and testing requirement for processed leaf mulch, therefore records and results are not applicable to the proposed leaf collection, processing, storage and mulch production facility.

8. The daily quantity of each type of end-product removed from the facility:

All of the produced mulch that is removed from the facility will be tracked and reported according to amount removed and date removed. Attachment 13 contains the form for reporting amount of mulch removed from the facility.

9. Training Records:

Records will be kept for each employee of Kramer Tree Service who is trained in Facility Operations and the record will be updated on a yearly basis.

Maintenance of Records:

All records shall be kept for a minimum of three years and will be available during normal business hours for inspection and photocopying by the Agency. Additionally, records must be sent to the Agency on request.

11.0 CONTINGENCY PLAN (831.07)

- A contingency plan has been established that addresses the contingencies set forth in Section 830.202(c) and the following additional contingencies:
 - 1. Equipment Breakdowns:

Kramer Tree Service maintains a fully operational tree care business on property where the LMPF is planned. Some of the equipment used for the facility is also used in this business. Duplicate equipment and qualified repair technicians are available at the site to deal with breakdown of equipment. Careful records are maintained on each piece of equipment to ensure that it stays in service. In the

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event of equipment failure that impairs the ability of the site to function, additional equipment will be supplied through a rental.

2. Odors

When a complaint is logged, the cause of the odor will be determined and remedied by implementing procedures outlined in Section 4: Operating Standards (g).

3. Unecceptable Waste Delivered to the Facility

Unacceptable waste will be rejected, prior to unloading, by the Site Yard Monitor. If municipal solid waste or other unacceptable landscape waste is dumped at the facility, it will be promptly removed from the facility and disposed of off-site at a permitted disposal facility. The closest facility is the DuKane Transfer Station operated by Groot Industries.

Often, small non-mulching materials are inadvertently accepted as "incidental" to the load (rocks, plastic bags, etc.). These materials are removed during the grinding and screening process and disposed of properly.

4. Groundwater Contamination

A reinforced concrete pad will be maintained at all times between the water table and the processed leaf storage piles. Groundwater contamination from the LMPF is highly unlikely.

5. Accidental Release of Special Waste

Should processed leaf materials become contaminated by antifreeze, diesel fuel or hydraulic oil from trucks and heavy equipment, the suspect material will undergo Special Waste Testing and Approval protocols as necessary by an IEPA approved sanitary landfill capable of accepting Special Waste. Once the waste is approved, it will be transported by a licensed special waste hauler and disposed of properly. The nearest facility is the DeKalb Landfill operated by Waste Management.

6. Fires, Dust, Noise, Vectors, Power Outages and Unusual Traffic Conditions

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Fires can occur within piles when temperatures rise above the combustion temperature of the materials. This is unlikely in a properly maintained leaf storage pile where temperatures average 40° C. The **Site Contingency Plan** in **Attachment 9**, list some procedures to be implemented in case of a fire or other emergency. Water is available from hydrants located at the mulch yard and hoses are kept in the equipment maintenance building on the property.

Dust problems will be remedied by watering access roads as needed. When excavating dry processed leaf piles, water should be used to suppress dust.

Noise is controlled through the use of mufflers on all vehicles. Maintenance of vehicles insures that excessive noise is keep to a minimum. The location of the site in a predominately industrial and manufacturing area and the distance from Roosevelt Road should mitigate noise issues from potential receptors.

In the event of a power outage, the Site Yard Monitor will revert to the use of hand recorded sheets to register the receipt of loads. The receiving hours for the site are such that daylight will be adequate for this task. All vehicles are equipped with lights to allow safe operation. Workers on the site receive and send communications by cell phone and/or two way radios. A power outage should not affect communications.

Rodent problems will be remedied by contracting with an extermination contractor who will visit the site and provide traps for rodents. Insect populations will be controlled using good housekeeping measures and selective use of pesticides. Mosquitoes will be kept to a minimum by preventing standing water to accumulate.

Traffic on Charles Court is light near the facility, and if adverse weather conditions or accidents occur, the facility will suspend deliveries until the episode is over. Alternatively, in the case of adverse weather, steps will be taken to slow traffic into and out of the facility to avoid accidents. Such steps might include the removal of snow, directing traffic manually in the appropriate safety clothing, and temporary repairs to roads. In the case of an accident, traffic will be re-routed or slowed to allow emergency personnel to gain access to the situation.

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b. The facility contingency plan will be available on-site and implemented as necessary.

12.0 CLOSURE PLAN (830.213)

- a. The following written closure plan has been developed and contains the following:
 - 1. Premature closing of the facility:

Should the Facility be closed prematurely, the following steps would be followed:

A. Kramer Tree Service shall immediately post signs in letters not less than three inches high:

"This facility is closed for all leaf processing and storage activities and receipt of leaf waste materials. No dumping allowed. Violators will be prosecuted."

- B. Written notification will be sent to large customers notifying them of the premature closure of the site and directing them to possible alternative permitted landscape waste transfer or composting sites.
- C. Any processed leaf material will be prepared as mulch and sold or allowed for pick-up before the 180-day clock expires.
- D. Any waste material or contaminated mulch would be disposed of properly.
- 2. Routine final closure of the facility:
 - A. The operator of the facility will maintain a copy of the closure plan at the facility. This will be available in the facility main office. Kramer Tree Service will initiate implementation of the closure plan within 30 days following the beginning of closure.

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- B. Upon the decision to close the Leaf Mulch Production Facility, a thirty-day (30) notice will be sent to the Agency
- C. Commensurate with the notification to the State, all large-scale customers who disposed of leaf landscape waste will be notified that the facility no longer is accepting landscape waste.
- D. Thirty days after the initiation of closure, signage with three inch text will be posted at all access gates to the facility and will read:

"This facility is closed for all leaf processing and storage activities and receipt of all leaf landscape waste materials. No dumping allowed, Violators will be prosecuted."

- E. Finished processed leaf storage and blended mutch pites will be managed as described in the Premature Closure Plan.
- F. Existing Financial Assurance shall be maintained until a Certificate of Closure is approved by the Agency
- G. An affidavit on an Agency supplied form will be submitted upon completion of closure.
- H. On or before April 1 of the year following closure, a Modified Annual Report will be filed with the Agency covering the period of time since the last Annual Report was submitted (April 1 of the previous year). The final report will verify that closure has been completed.
- 3 Steps to be taken to prevent damage to the environment during temporary suspension:

In the event that there is suspension of activities, the leaf landscape waste can be re-routed to another permitted landscape waste transfer facility located in West Chicago, the DuPage Yard Waste Transfer Station.

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4. A revised closure plan will be developed and submitted to the Agency if a modification of the operation of the facility is proposed that would affect the cost of closure of the facility or any portion thereof. This would include; a temporary suspension of leaf landscape waste acceptance at the facility; or an increase of the design capacity to process leaf landscape waste.

13.0 SUBPART F: FINANCIAL ASSURANCE PLAN (830.601, 830.602, 830.603, 830.604, 830.605, 830.606)

a. Written Cost Estimate

For the purposes of preparing this written cost estimate, the following is assumed:

- The rate of leaf landscape waste that enters the facility is based on the maximum volume of leaf landscape waste permitted, which is 30,000 cubic yards.
- The maximum volume of landscape waste on site is equal to the annual maximum, 30,000 cubic yards. This is the total volume of processed leaf material that will require removal, during a 180 day closure period,
- The volume available for blending into mulch, can consume the leaf storage pile at closure (20,000 cubic yards after consolidation) under worst case scenario conditions. The worst case scenario is described as follows:
 - a. In late December, all leaves have been collected, processed and are waiting to be utilized for sale as mulch.
 - b. One equipment operators will work at the facility during 60 working days within the required 90 day closure period, in order to complete the mulch production and then loading it into tucks for removal. Estimated removal rate of 2,000 cubic yards per day.

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- c. The mutch material will be sold at a bulk rate in order to serve as an incentive to facilitate its removal.
- d. The estimated quantity of raw material accumulated at the site for the 90 days prior to closure is 30,000 cubic yards as described in 2) and 3) above. The quantity available for sale as mulch is 20,000 cubic yards.
- e. Closure Costs are limited to the 60 days of operation required to process and load the material. Any remaining processed leaf material not blended into mulch will be delivered to the West DuPage Landscape Waste Transfer Station less than one-quarter mile away located on Washington Street. The amount of material is estimated to be less than 75 cubic yards and the tipping fees are estimated at \$15.00 per cubic yard.

item	Unit Cost	Total Cost
11 days of Operation: Labor and Equipment loading @\$120.00 hour	\$960.00 per day	\$10,560
30,000 cubic yards of leaves processed	\$1.50 per cubic yard	\$45,000
Closure Certification and Annual Report	12 hours @\$80 per hour consultant fee	\$ 900
Removal of Unsuitable Material for Disposal @ 75 cubic yards	\$15.00 cubic yards	\$1,125
Bulk Mulch Revenue for 20,000 cubic yards	\$4.00 per cubic yard	(\$80,000)
· · · · · · · · · · · · · · · · · · ·	Total:	\$(22,415)

f. The itemized cost of closure is as follows:

b. Financial Assurance Mechanism

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Kramer Tree Service will not be required to fund the cost of closure for this facility due to the net positive outcome for closure of the LMPF.

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The operator will submit to the Agency a Facility Financial Assurance Plan Compliance Certification with the information required by III. Adm.Code 830.606, a), b) c), d) and e).

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ATTACHMENT 1: USGS WEST CHICAGO 7.5 MINUTE QUADRANGLE MAP

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ATTACHMENT 2:

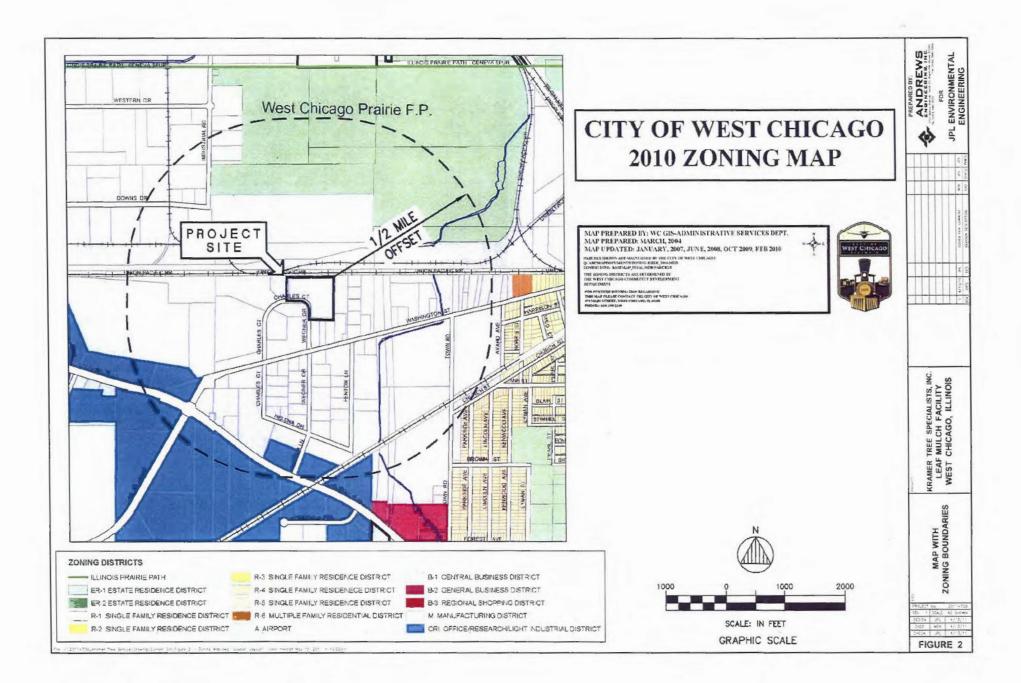
FIGURE 1: USGS SITE LOCATION MAP

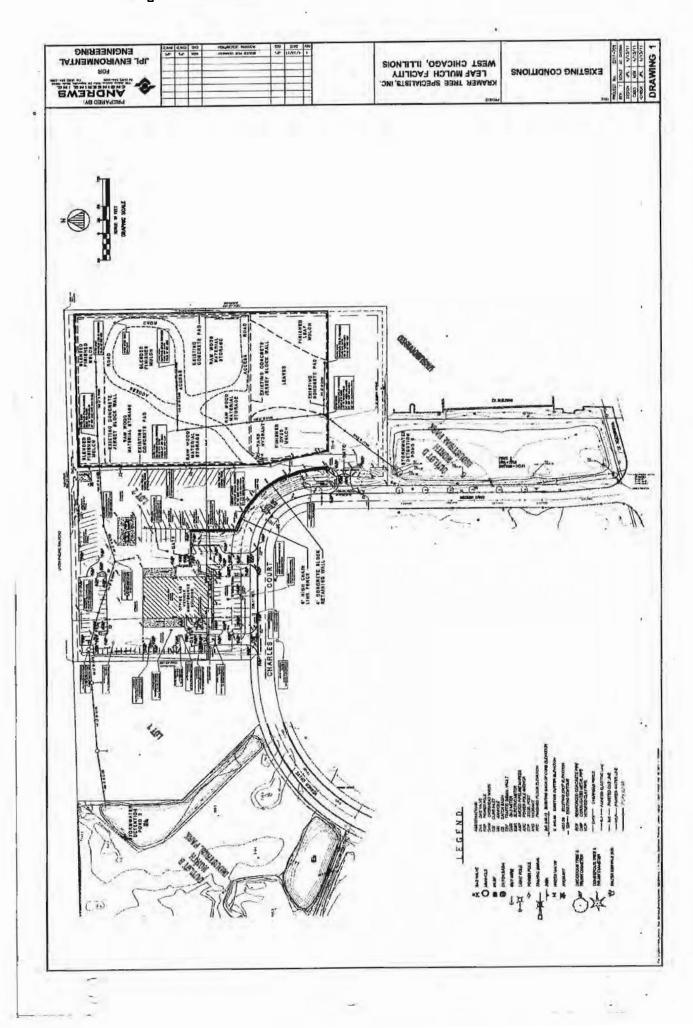
FIGURE 2: LAND USE/SITE ZONING MAP

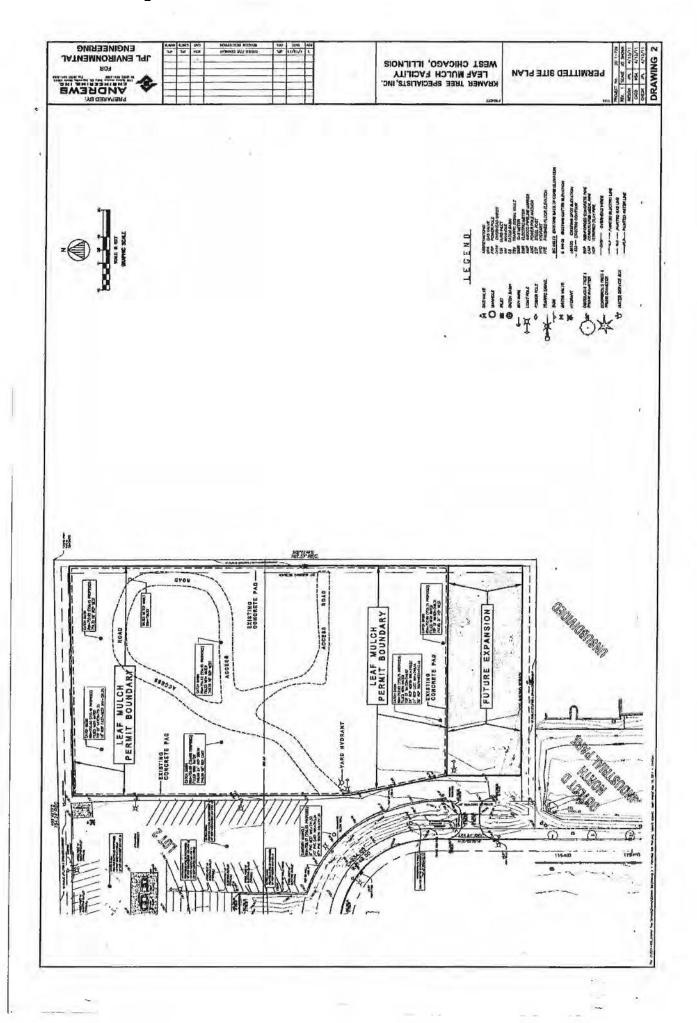
SHEET 1: EXISTING CONDITIONS SITE PLAN

SHEET 2: PERMIT SITE PLAN









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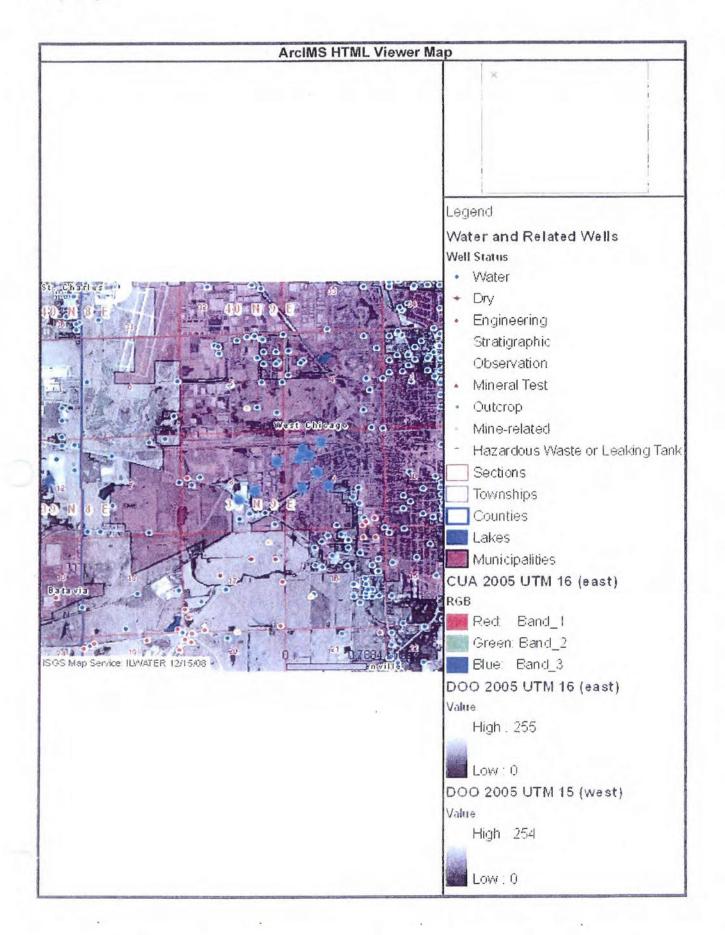
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ATTACHMENT 3: POTABLE WATER WELL LOCATION MAP AND INFORMATION LOGS

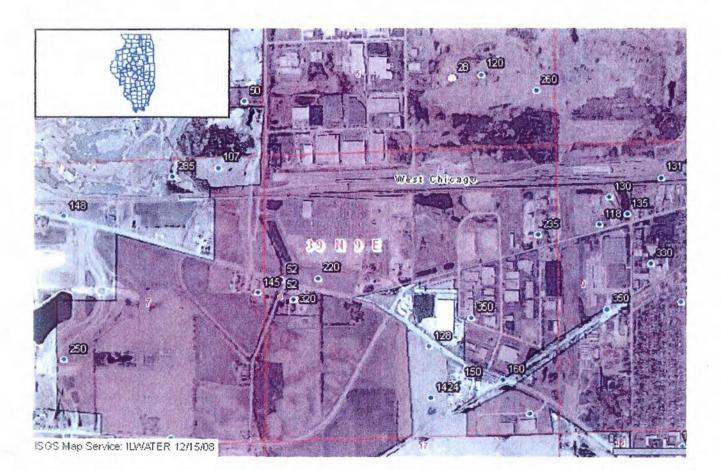
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Map Output

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Page 1 ILLINOIS STATE GEOLOGICAL SURVEY

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clay & boulders	13	92
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gray lime	103	107
porque white lime	107	123
hard white lime	123	199
gray lime	199	210
white lime	210	255
gray lime	255	345
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LOCATION 2250'N line, 1750'W line of section LATITODE 41.879171 LONGITUDE ~88.2175		
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