

**BEFORE THE ILLINOIS POLLUTION CONTROL BOARD**

CLINTON LANDFILL, INC., )  
 )  
 Petitioner, )  
 )  
 v. )  
 )  
 ILLINOIS ENVIRONMENTAL )  
 PROTECTION AGENCY, )  
 )  
 Respondent. )



ORIGINAL

RECEIVED  
OFFICE OF THE CLERK  
JAN 13 2015  
OFFICE OF THE CLERK  
ILLINOIS POLLUTION CONTROL BOARD

PCB 15-60  
PCB 15-76  
(Permit Appeal - Land)

**NOTICE OF FILING**

PLEASE TAKE NOTICE that on the 13th day of January 2015, I have filed with the Office of the Clerk of the Pollution Control Board a supplement to the Administrative Record with Modifications Nos. 18 and 46 of Permit No. 2005-070-LF and a revised Index on behalf of Respondent, Illinois Environmental Protection Agency. The supplement to the Administrative Record and a revised Index are attached hereto and served upon the persons listed in the attached Service List.

ILLINOIS ENVIRONMENTAL  
PROTECTION AGENCY

By LISA MADIGAN  
Attorney General of the  
State of Illinois

Jennifer A. Van Wie  
Assistant Attorney General  
Environmental Bureau  
69 W. Washington Street, Suite 1800  
Chicago Illinois, 60602  
(312) 814-0609  
jvanwie@atg.state.il.us

Date: January 13, 2015

**THIS FILING IS SUBMITTED ON RECYCLED PAPER**

RECEIVED  
CLERK'S OFFICE

JAN 13 2015

STATE OF ILLINOIS  
Pollution Control Board

**SERVICE LIST**

For Petitioner:

Brian J. Meginnes

Janaki Nair

Elias, Meginnes, Riffle & Seghetti, P.C.

416 Main Street, Suite 1400

Peoria, Illinois 61602-1153

(By electronic mail at [bmeginnes@emrslaw.com](mailto:bmeginnes@emrslaw.com) and [jnair@emrslaw.com](mailto:jnair@emrslaw.com))

For Respondent:

James Jennings

Division of Legal Counsel

Illinois Environmental Protection Agency

1021 North Grand Avenue East

P.O. Box 19276

Springfield, Illinois 62794-9276

(Notice and Certification Only - by electronic mail)

For the Illinois Pollution Control Board:

Carol Webb

Hearing Officer

Illinois Pollution Control Board

1021 North Grand Avenue East

P.O. Box 19274

Springfield, Illinois 62794-9274

(Notice and Certification Only - by electronic mail at [carol.webb@illinois.gov](mailto:carol.webb@illinois.gov))

**CERTIFICATE OF SERVICE**

I, JENNIFER A. VAN WIE, an Assistant Attorney General, do certify that I caused a supplement to the Administrative Record with Modifications Nos. 18 and 46 of Permit No. 2005-070-LF and a revised Index in this matter to be served upon the persons listed in the Service List in the manner specified by the Service List.

  
JENNIFER A. VAN WIE

Date: January 13, 2015

**BEFORE THE ILLINOIS POLLUTION CONTROL BOARD**

**RECEIVED**  
CLERK'S OFFICE  
JAN 18 2015  
STATE OF ILLINOIS  
Pollution Control Board

CLINTON LANDFILL, INC.,            )  
  )  
    Petitioner,                        )  
  )  
    v.                                    )  
  )  
ILLINOIS ENVIRONMENTAL        )  
PROTECTION AGENCY,            )  
  )  
    Respondent.                      )

PCB 15-60  
PCB 15-76  
(Permit Appeal - Land)

**RECORD INDEX – THIRD REVISED (January 13, 2015)**

Respondent, ILLINOIS ENVIRONMENTAL PROTECTION AGENCY (“Illinois EPA”), in accordance with the procedural rules of the Illinois Pollution Control Board (“Board”) as set forth in 35 Ill. Adm. Code 105.212 and 105.116, files in this cause the Illinois EPA's Administrative Record of Modification No. 47 to Permit No. 2005-070-LF (“Record”), issued to Clinton Landfill, Inc. (“CLI”) on July 31, 2014, which is attached and consists of the following documents:

1. Initial Application to Develop a New Non-Hazardous Solid Waste Landfill, Clinton Landfill, PDC Technical Services, Inc., Volume 1, dated February 28, 2005. (00000001-00000507).
2. Initial Application to Develop a New Non-Hazardous Solid Waste Landfill, Clinton Landfill, PDC Technical Services, Inc., Volume 2, dated February 2005. (00000508-00001399).
3. Initial Application to Develop a New Non-Hazardous Solid Waste Landfill, Clinton Landfill, PDC Technical Services, Inc., Volume 3, dated February 2005. (00001400-00002190).
4. Initial Application to Develop a New Non-Hazardous Solid Waste Landfill, Clinton Landfill, PDC Technical Services, Inc., Volume 4, dated February 2005. (00002191-00002968).

5. Initial Application to Develop a New Non-Hazardous Solid Waste Landfill, Clinton Landfill, PDC Technical Services, Inc., Volume 5, dated February 2005. (00002969-00003580).
6. Letter from George Armstrong, PDC Technical Services, Inc. to Illinois EPA, Bureau of Land, additional information, dated April 15, 2005. (00003581-00003656).
7. Letter from John R. Berry, PDC Technical Services, Inc. to Illinois EPA, supplying additional information in response to Illinois EPA's letter of incompleteness, dated July 7, 2005. (00003657-00003671).
8. Letter from John R. Berry, PDC Technical Services, Inc. to Joyce L. Munie, Illinois EPA, regarding a 45-day extension to review, dated October 12, 2005. (00003672).
9. Facsimile from John R. Berry, PDC Technical Services, Inc. to Imran Syed, Illinois EPA with attached 45-day extension letter, dated October 12, 2005. (00003673-00003674).
10. Letter from George Armstrong, PDC Technical Services, Inc. to Imran Syed, Illinois EPA, regarding a 45-day extension to review, dated November 21, 2005. (00003675).
11. Facsimile from George Armstrong, PDC Technical Services, Inc. to Imran Syed, Illinois EPA with attached 45 day extension letter, dated November 21, 2005. (00003676-00003677).
12. Letter from George Armstrong, PDC Technical Services, Inc. to Joyce L. Munie, Illinois EPA, regarding a 45-day extension to review, dated December 29, 2005. (00003678).
13. Facsimile from George Armstrong, PDC Technical Services, Inc. to Imran Syed, Illinois EPA with attached 45-day extension letter, dated December 29, 2005. (00003679-00003680).
14. Letter from George Armstrong, PDC Technical Services, Inc. to Joyce L. Munie, Illinois EPA, regarding a clarification of the 45-day extension to review with new deadline of February 20, 2006, dated December 30, 2005. (00003681).
15. Facsimile from George Armstrong, PDC Technical Services, Inc. to Imran Syed, Illinois EPA with attached 45-day extension clarification letter, dated December 30, 2005. (00003682-00003683).
16. Letter from John Berry, PDC Technical Services, Inc. to Joyce L. Munie, Illinois EPA regarding a 90-day extension to review until May 21, 2005, dated February 16, 2006. (00003684).
17. Facsimile from John Berry, PDC Technical Services, Inc. to Imran Syed, Illinois EPA, with attached 90-day extension letter, dated February 16, 2006. (00003685-00003686).

18. Letter from John Berry, PDC Technical Services, Inc. to Joyce L. Munie, Illinois EPA regarding a 90-day extension to review until May 21, 2005, dated February 16, 2006. (00003687).
19. Facsimile from John Berry, PDC Technical Services, Inc. to Imran Syed, Illinois EPA, with attached 90-day extension letter, dated February 16, 2006. (00003688-00003689).
20. Letter from George Armstrong, PDC Technical Services, Inc. to Steve Nightingale, Illinois EPA regarding a 45-day extension to review with deadline July 5, 2006, dated May 3, 2006. (00003690).
21. Facsimile from George Armstrong, PDC Technical Services, Inc. to Imran Syed, Illinois EPA, with attached 45-day extension letter, dated May 3, 2006. (00003691-00003692).
22. Additional Information Supporting an Application for Permit to Develop a Non-Hazardous Solid Waste Landfill, Clinton Landfill, Volume 1, received June 12, 2006. (00003693-00003991).
23. Additional Information Supporting an Application for Permit to Develop a Non-Hazardous Solid Waste Landfill, Clinton Landfill, Volume 2, received June 12, 2006. (00003992-00004334).
24. Additional Information Supporting an Application for Permit to Develop a Non-Hazardous Solid Waste Landfill, Clinton Landfill, Volume 3, received June 12, 2006. (00004335-00005748).
25. Additional Information Supporting an Application to Develop a Non-Hazardous Solid Waste Landfill, Clinton Landfill, Volume 1, received November 21, 2006. (00005749-00006440).
26. Additional Information Supporting an Application to Develop a Non-Hazardous Solid Waste Landfill, Clinton Landfill, Volume 2, received November 21, 2006. (00006441-00006639).
27. Additional Information Supporting an Application to Develop a Non-Hazardous Solid Waste Landfill, Clinton Landfill, Volume 1 of 1, received January 12, 2007. (00006640-00006940).
28. Letter from George Armstrong, PDC Technical Services, Inc. to Stephen Nightingale, Illinois EPA providing additional information consisting of revised post-closure, dated February 8, 2007. (00006941-00006951).

29. Letter from George Armstrong, PDC Technical Services, Inc. to Stephen Nightingale, Illinois EPA providing additional information consisting of revised post-closure, dated February 8, 2007. (00006952-00006961).
30. Letter from George Armstrong, PDC Technical Services, Inc. to Stephen Nightingale, Illinois EPA providing additional information, dated February 15, 2007. (00006962-00006967).
31. Facsimile from George Armstrong, PDC Technical Services, Inc. to Imran Syed, Illinois EPA with attached additional information letter, dated February 15, 2007. (00006968-00006975).
32. Letter from Stephen F. Nightingale, Bureau of Land, Illinois EPA to Ron L. Edwards, Clinton Landfill, Inc. granting permit (2005-070-LF) to Clinton Landfill, Inc. and approving the development of new municipal solid waste and non-hazardous special waste landfill with attachments, dated March 2, 2007. (00006976-00007488).
33. Letter from Stephen F. Nightingale, Bureau of Land, Illinois EPA to Ron L. Edwards, Clinton Landfill, Inc., regarding 2005-070-LF with attachments, dated May 7, 2008. (00007489-00007553).
34. Memorandum from Ted Dragovich, Illinois EPA to Chris Lichman, Illinois EPA regarding response to CROPA memo, dated November 16, 2007. (00007554-00007556).
35. Letter from George L. Armstrong, PDC Technical Services, Inc. to Stephen F. Nightingale, Bureau of Land, Illinois EPA regarding Significant Modification Application to Develop a Rail Off Leading Facility, dated November 1, 2007. (00007557-00007560).
36. DIS Location Worksheet, not dated. (00007561).
37. Review Notes – Imran Syed, Clinton Landfill #3, Log No. 2007-459, regarding development of rail off loading facility, not dated. (00007562-00007569).
38. Letter from Stephen F. Nightingale, Illinois EPA to Ron Edwards, Clinton Landfill, Inc. regarding completeness determination, dated November 30, 2007. (00007570-00007576).
39. Facsimile from Illinois EPA to George Armstrong, regarding Draft denial letter for the rail-off loading facility, dated January 9, 2008. (00007577-00007579).
40. Meeting sign-in sheet, dated January 23, 2008. (00007580).
41. File notes regarding rail road transfer station, dated January 23, 2008. (00007581).

42. Permit Modification Application to Develop a Rail Off-Loading facility, Clinton Landfill, received November 2, 2007. (00007582-00007661).
43. Letter from George Armstrong, PDC Technical Services, Inc. to Stephen F. Nightingale, Illinois EPA, regarding Significant Modification Application to Develop a Rail Off-Loading Facility with IEPA permit application forms attached, dated November 26, 2007. (00007662-00007667).
44. Letter from George L. Armstrong, PDC Technical Services, Inc. to Stephen Nightingale, Illinois EPA granting a 45-day extension of review deadline, dated January 29, 2008. (00007668).
45. Facsimile from George Armstrong to Imran Syed, Illinois EPA with attached 45-day extension letter, dated January 29, 2008. (00007669-00007670).
46. Letter from George Armstrong, PDC Technical Services, Inc. to Stephen Nightingale, Illinois EPA providing additional information on the application to develop rail off loading facility, dated February 11, 2008. (00007671-00007783).
47. Letter from William Bicher, PDC Technical Services, Inc. to Stephen Nightingale, Illinois EPA granting the Illinois EPA a 30 day extension of the review deadline, dated March 12, 2008. (00007784).
48. Facsimile from William Bicher, PDC Technical Services, Inc. to Imran Syed, Illinois EPA with attached 30 day extension letter, dated March 12, 2008. (00007785-00007786).
49. Letter from William Bicher and George Armstrong, PDC Technical Services, Inc. to Stephen Nightingale, Illinois EPA regarding additional information on the application to develop a rail off loading facility, dated April 10, 2007. (00007787-00007853).
50. Letter from Stephen Nightingale, Illinois EPA to Ron Edwards, Clinton Landfill, Inc. permit granted for the development of a new municipal solid waste and non-hazardous special waste landfill, dated January 8, 2010. (00007854-00007919).
51. Application completeness checklist, undated. (00007920-00007939).
52. Memorandum from Steve Nightingale to Ed Bakowski, notice of lead project for Coordinated Permit Review Consolidation, dated July 1, 2008. (00007940-00007941).
53. BOL Reference Sheet, undated. (00007942-00007943).
54. Public Comment listing. Portions redacted. (00007944).
55. Email Mitchell to King/Nightingale, November 23, 2009. Portions redacted. (00007945).



56. Email Holt to Mitchell, December 1, 2009. Portions redacted. (00007946).
57. Determination of the time of travel capture zones and time-dependent recharge areas for the Clinton, Illinois water supply wells, Illinois State University, 1996. (00007947-00008125).
58. Letter from University of Illinois to Doug Scott, Director Illinois EPA regarding proposed PCB waste landfill in DeWitt County, dated January 5, 2010. (00008126-00008132).
59. Memorandum from Michael Summers to Imran Syed providing technical review groundwater impact assessment, dated November 4, 2005. (00008133-00008168).
60. Technical review, dated December 27, 2006. (00008169-00008185).
61. Technical review, dated February 15, 2007. (00008186-00008359).
62. Public comment listing (00008360).
63. Public comment from Laurel Prussing, City of Urbana Mayor, dated October 12, 2009. (00008361).
64. Public comments. Portions redacted. (00008362-00008412).
65. Letter from David Holt to Mahomet Sole Source Aquifer Working Group, Preliminary draft Petition for the Designation of the Mahomet Aquifer in DeWitt County, Illinois as a Sole Source Aquifer, dated December 3, 2009. Portions redacted. (00008413-00008434).
66. Email string from Steve Nightingale to Gary King, regarding proposed Clinton PCB landfill, January 6, 2010. (00008435).
67. Email from Allen Wehrmann to Doug Scott regarding proposed Clinton PCB landfill, January 5, 2010. (00008436).
68. Letter from Allen Wehrmann to Doug Scott regarding proposed Clinton PCB waste landfill in DeWitt County, dated January 3, 2010. (00008437-00008443).
69. Facsimile from Imran Syed to Bill Spencer regarding application for permit to develop a non-hazardous landfill, dated May 14, 2009. (00008444-00008447).
70. Citizen correspondence. Portions redacted. (00008448-00008451).
71. Public comments. (00008452-00008459).

72. Pantagraph article, dated December 18, 2007. (00008460).
73. Solid waste reviewer's notes and permit history. (00008461-00008545).
74. Evaluation of the Potential for Area Disposal Company Proposed Chemical Waste Unit Landfill to Pollute the County Water Resources with Hazardous Chemicals, G. Fred Lee, PhD, G. Fred Lee & Associates, May 7, 2009. (00008546-00008635).
75. Letter from Stephen Nightingale to Chris Coulter, Clinton Landfill, Inc., requesting a 60 day extension, dated December 3, 2009. (00008636).
76. Email string between Chris Lieberman to Jayne Wilson, Steve Nightingale, Ron Edwards and Gary Yaske, date range December 7, 2009 through December 8, 2009. (00008637).
77. Letter from Ron Edwards, Clinton Landfill, Inc., to Stephen Nightingale, Illinois EPA regarding a 17 day extension, dated December 7, 2009. (00008638-00008639).
78. Letter from Stephen Nightingale, Illinois EPA to Ron Edwards, Clinton Landfill, Inc., regarding application addendum submitted by Shaw Environmental, dated October 9, 2009. (00008640-00008643).
79. Letter from Dan Drommerhausen, Shaw Environmental, Inc. to Stephen Nightingale, Illinois EPA, providing revised Monitoring Well Phasing Plan, September 22, 2009. (00008644-00008650).
80. Letter from Stephen Nightingale, Illinois EPA to Ron Edwards, Clinton Landfill, Inc., regarding an application addendum from George Armstrong, dated July 2, 2009. (00008651-00008656).
81. Letter from Stephen Nightingale, Illinois EPA to Ron Edwards, Clinton Landfill, Inc. regarding completeness review, dated March 6, 2008. (00008657).
82. Completeness checklist. (00008658-00008669).
83. Facsimile from Imran Syed, Illinois EPA to Dan Drommerhausen, Shaw Environmental, Inc. regarding permit application, dated September 3, 2009. (00008670-00008672).
84. Facsimile from Imran Syed to George Armstrong, PDC Technical Services with letter, dated July 21, 2009. (00008673-00008676).
85. Facsimile from Imran Syed to George Armstrong, PDC Technical Services with letter, dated May 5, 2009. (00008677-00008679).
86. Facsimile from Imran Syed to George Armstrong, PDC Technical Services with letter, dated May 5, 2009. (00008680-00008683).

87. Facsimile from Imran Syed to George Armstrong, PDC Technical Services with letter, dated August 13, 2008. (00008684-00008689).
88. Facsimile from Imran Syed to George Armstrong, PDC Technical Services with letter, dated July 2, 2008. (00008690-00008695).
89. Letter from George Armstrong, PDC Technical Services, Inc. to Stephen Nightingale, Illinois EPA, Application for Significant Modification, Volume 1, Clinton Landfill, dated February 1, 2008. (00008696-00009620).
90. Application for Significant Modification, Permit No. 2005-070, Clinton Landfill, Volume 2, dated February 1, 2008. (00009621-00009960).
91. Additional Information, Appendix C, Chemical Waste Unit Operating Plan, Clinton Landfill, PDC Technical Services Inc., revised January 2009. (00009961-00010016).
92. Letter from John Berry, PDC Technical Services, Inc. to Steve Nightingale, Illinois EPA regarding a 60 day extension of the review deadline, dated May 1, 2008. (00010017).
93. Facsimile from John Berry, PDC Technical Services, Inc. to Gwenyth Thompson, Illinois EPA, with attached 60 day extension letter, dated May 1, 2008. (00010018-00010019).
94. Letter from George Armstrong, PDC Technical Services, Inc. to Steve Nightingale, Illinois EPA regarding a 60day extension of the review deadline, dated July 2, 2008. (00010020).
95. Facsimile from George Armstrong, PDC Technical Services, Inc. to Imran Syed, Illinois EPA, with attached 60 day extension letter, dated July 2, 2008. (00010021-00010022).
96. Letter from George Armstrong, PDC Technical Services, Inc. to Steve Nightingale, Illinois EPA regarding a 60 day extension of the review deadline, dated August 27, 2008. (00010023).
97. Facsimile from George Armstrong, PDC Technical Services, Inc. to Imran Syed, Illinois EPA, with attached 60 day extension letter, dated August 27, 2008. (00010024-00010025).
98. Letter from George Armstrong, PDC Technical Services, Inc. to Steve Nightingale, Illinois EPA regarding 85 day extension of the review deadline, dated October 29, 2008. (00010026).
99. Facsimile from George Armstrong, PDC Technical Services, Inc. to Imran Syed, Illinois EPA, with attached 85 day extension letter, dated October 29, 2008. (00010027-00010028).

100. Letter from Jesse Varsho, Shaw Environmental, Inc. to Stephen Nightingale, Illinois EPA, regarding responses to draft denial points (addendum), dated January 13, 2009. (00010029-00010041).
101. Application for Significant Modification, Permit No. 2005-070, Clinton Landfill, Volume 3, received January 14, 2009. (00010042-00012529).
102. Additional Information Application for Significant Modification, Permit No. 2005-070, Clinton Landfill, Volume 1, dated January 23, 2009. (00012530-00012722).
103. Letter from George Armstrong, PDC Technical Services, Inc. to Stephen Nightingale, Illinois EPA, an additional copy of Response to Draft Denial Points (January 13, 2009) and Additional Information (January 23, 2009), dated February 20, 2009. (00012723).
104. Letter from George Armstrong, PDC Technical Services, Inc. to Stephen Nightingale, Illinois EPA regarding a 30 day extension to the review deadline, dated April 21, 2009. (00012724).
105. Facsimile from George Armstrong, PDC Technical Services, Inc. to Imran Syed, Illinois EPA, with attached 30 day extension letter, dated April 21, 2009. (00012725-00012726).
106. Letter from George Armstrong, PDC Technical Services, Inc. to Stephen Nightingale, Illinois EPA regarding a 30 day extension to the review deadline, dated May 20, 2009. (00012727).
107. Facsimile from George Armstrong, PDC Technical Services, Inc. to Imran Syed, Illinois EPA, with attached 30 day extension letter, dated May 20, 2009. (00012728-00012729).
108. Additional Information Application for Significant Modification, Permit No. 2005-070, Volume 1, Clinton Landfill, dated June 10, 2009. (00012730-00012907).
109. Letter from Dan Drommerhausen, Shaw Environmental, Inc. to Stephen Nightingale, Illinois EPA, regarding responses to draft denial points, dated June 24, 2009. (00012908-00013124).
110. Letter from George Armstrong, PDC Technical Services to Stephen Nightingale, Illinois EPA, providing additional information in response to draft denial points 9 and 10, dated July 28, 2009. (00013125-00013270).
111. Letter from Dan Drommerhausen, Shaw Environmental, Inc. to Stephen Nightingale, Illinois EPA, response to comments received from IEPA (July 21, 2009), dated August 18, 2009. (00013271-00014456).

112. Letter from George Armstrong, PDC Technical Services, Inc. to Stephen Nightingale, Illinois EPA, regarding revisions to pages 2, 3 and 18 of the permit application, dated August 27, 2009. (00014457-00014463).
113. Letter from Dan Drommerhausen, Shaw Environmental, Inc. to Stephen Nightingale, Illinois EPA, providing response to IEPA draft denial letter (September 3, 2009), dated September 4, 2009. (00014464-00014716).
114. Letter from George Armstrong, PDC Technical Services, Inc. to Stephen Nightingale, Illinois EPA, providing revisions to pages 24 and 25 of the application, dated September 14, 2009. (00014717-00014720).
115. Facsimile from George Armstrong, PDC Technical Services, Inc. to Imran Syed, Illinois EPA, with attached September 14, 2009 letter, dated September 14, 2009. (00014721-00014725).
116. Letter from Dan Drommerhausen, Shaw Environmental, Inc. to Stephen Nightingale, Illinois EPA, revised Monitoring Well Phasing plan, dated September 22, 2009. (00014726-00014740).
117. Letter from Stephen Nightingale, Illinois EPA to Chris Coulter, Clinton Landfill, Inc. requesting a 60 day extension, dated December 3, 2009. (00014741-00014743).
118. Letter from Ron Edwards, Clinton Landfill, Inc. to Stephen Nightingale, Illinois EPA, granting a 17 day extension to review, dated December 7, 2009. (00014744-00014745).
119. Public Hearing Notice. (00014746).
120. Public Comments. (00014747-00014754).
121. Public Comment listing. (00014755).
122. IEPA approval of permit to Clinton Landfill, Inc. for development of a new municipal solid waste and non-hazardous special waste landfill, dated July 5, 2012. (00014756-00014833).
123. Completeness review checklist. (00014834-00014848).
124. Public Comments. (00014849-00014893).
125. Memorandum from Kimberly A. Rawe, Illinois EPA to Imran Syed, Illinois EPA reviewing significant modification application for Clinton Landfill, dated April 19, 2012 revised June 20, 2012. (00014894-00014906).

126. Letter from David L. Wentworth II, Hasselberg, Williams, Grebe, Snodgrass & Birdsall to Stan Black, Illinois EPA pertaining to the protection of Mahomet Aquifer, dated April 17, 2012. (00014907-00014909).
127. Exempt document, Email from Stan Black, Illinois EPA, dated April 17, 2012. (00014910).
128. Public Comments. (00014911-00014937).
129. Email string from Joyce Day, PDC Technical Services, Inc. to Kimberly Rawe, Illinois EPA regarding Clinton 3 CWU leachate evaluation-4<sup>th</sup> quarter 2001-revised, dated June 19, 2012. (00014938-00014997).
130. Groundwater Technical review, Clinton Landfill, dated June 19, 2012. (00014998-00014999).
131. Email from Kimberly Rawe, Illinois EPA to Imran Syed, Illinois EPA regarding Clinton #3 renewal comments, dated April 19, 2012. (00015000).
132. Groundwater Technical review, Clinton Landfill, dated April 23, 2012. (00015001-00015002).
133. Solid Waste reviewers' notes. (00015003-00015019).
134. Email string from Bur Filson to Imran Syed, regarding Clinton landfill data and site ID, dated June 12, 2012. (00015020-00015022).
135. Email from George Armstrong, PDC Technical Services Inc. to Imran Syed, Illinois EPA regarding signed PA-16 certified mail receipts 1-14-12, dated March 6, 2012. (00015023-00015028).
136. Solid Waste reviewers' notes and permit application history for site number 0390055036. (00015029-00015038).
137. Letter from Steve Nightingale, Illinois EPA to Ron Welk, Clinton Landfill, Inc. regarding the completeness review with completeness checklist and notes, dated December 14, 2011. (00015039-00015043).
138. Email from Imran Syed, Illinois EPA to George Armstrong, PDC Technical Services, Inc., regarding Clinton 3 draft denial, dated June 19, 2012. (00015044-00015047).
139. Email from Imran Syed, Illinois EPA to George Armstrong, PDC Technical Services, Inc., regarding Clinton 3 draft denial, dated April 19, 2012. (00015048-00015051).

140. Email from Imran Syed, Illinois EPA to George Armstrong, PDC Technical Services, Inc., regarding Clinton 3 draft denial, dated April 23, 2012. (00015052-00015055).
141. Meeting notes February 28, 2012. (00015056-00015061).
142. Meeting notes March 26, 2012. (00015062-00015063).
143. Permit Renewal Application, Clinton Landfill, November 17, 2011. (00015064-00015398).
144. Letter from George Armstrong, PDC Technical Services, Inc. to Stephen Nightingale, Illinois EPA providing additional information, dated November 23, 2011. (00015399-00015401).
145. Letter from William Bicher, PDC Technical Services, Inc. to Stephen Nightingale, Illinois EPA making necessary changes with the approved Operating Plan, dated January 27, 2012. (00015402-00015404).
146. Letter from George Armstrong, PDC Technical Services, Inc. to Stephen Nightingale, Illinois EPA providing supplemental drawings, dated February 2, 2012. (00015405-00015406).
147. Letters from George Armstrong, PDC Technical Services, Inc. Notices of Application for Permit to Manage Waste, dated February 14, 2012. (00015407-00015416).
148. Letter from George Armstrong, PDC Technical Services, Inc. to Stephen Nightingale, Illinois EPA granting an extension of decision deadline, dated March 7, 2012. (00015417).
149. Letter from William Bicher, PDC Technical Services, Inc. to Stephen Nightingale, Illinois EPA, additional information, dated April 9, 2012. (00015418-00015442).
150. Letter from George Armstrong, PDC Technical Services, Inc. to Stephen Nightingale, Illinois EPA granting a 45 day extension of the decision deadline, dated April 19, 2012. (00015443).
151. Letter from Dan Drommerhausen, Shaw Environmental, Inc. to Stephen Nightingale, Illinois EPA regarding groundwater impact assessment, dated May 21, 2012. (00015444-00015547).
152. Letter from George Armstrong, Joyce Day, PDC Technical Services, Inc. to Stephen Nightingale, Illinois EPA, additional information in response to November 17, 2011 draft denial letter, dated May 24, 2012. (00015548-00015577).

153. Letter from George Armstrong, PDC Technical Services, Inc. to Stephen Nightingale, Illinois EPA, additional information in response to June 19, 2012 draft denial letter, dated June 21, 2012. (00015578-00015706).
154. Email from George Armstrong, PDC Technical Services, Inc. to Imran Syed, Illinois EPA, additional information in response to draft denial letter, dated June 21, 2012. (00015707).
155. Email from Doug Clay, Illinois EPA to Kyle Rominger, Illinois EPA regarding a portion of the July 11 & 15, 2002 hearings transcript siting issues, dated May 18, 2012. (00015708-00015744).
156. Letter from Lisa Bonnett, Illinois EPA to Bill Spencer, WATCH Clinton Landfill, response to May 16, 2011 WATCH letter, dated June 10, 2011. (00015745-00015746).
157. Letter from Chris Koos, Town of Normal Mayor to Governor Pat Quinn and Director Lisa Bonnett, meeting comments, dated May 9, 2014. (00015747-00015748).
158. Letter from Karle Koritz, DeWitt County State's Attorney to John J. Kim, Chief Legal Counsel, Illinois EPA, regarding Clinton Landfill siting approval, dated July 25, 2014. (00015749-00015751).
159. Letter from Stephen Nightingale, Illinois EPA to Ronald Welk, Clinton Landfill, Inc. modifying the permit, dated July 31, 2014. (00015752-00015755).
160. Letter from Stephen Nightingale, Illinois EPA to Ronald Welk, Clinton Landfill, Inc. granting permit approving the development of a new municipal solid waste and non-hazardous special waste landfill, dated July 31, 2014. (00015756-00015835).
161. Completeness review checklist. (00015836-00015837).
162. Letter from John J. Kim, Illinois EPA to Sherrie Brown, DeWitt County Board and Karle Koritz, DeWitt County State's Attorney response to letters, dated July 22, 2014. (00015838).
163. Letter from Sherrie Brown, DeWitt County Board to John J. Kim, Illinois EPA regarding the acceptance of polychlorinated biphenyl (PCB) waste, dated July 24, 2014. (00015839-00015840).
164. Excerpt of Operating Plan, April 2002. (00015841-00015851).<sup>1</sup>

---

<sup>1</sup> On January 13, 2015, the Hearing Officer granted the IEPA's Motion to Supplement the Record, which was filed on January 6, 2015, allowing for the inclusion of a missing page that was inadvertently excluded during copying and numbering. The missing page is inserted between pages 15841 and 15842 of the record and is numbered 15841A.



165. Resolution of DeWitt County Board, November 2013. (00015852-00015854).
166. Excerpt of July 11, 2002 hearing transcript. (00015855-00015864).
167. Review Notes, Clinton Landfill, Imran Syed. Portions redacted. (00015865-00015868).
168. Letter from Steve Nightingale, Illinois EPA, to Ronald J. Welk, Clinton Landfill, Inc., modifying the landfill permit (Mod 48), dated September 17, 2014. (00015869-00015950).
169. Permit Approving Development of New Non-Hazardous Solid Waste Landfill, Clinton Landfill, PDC Technical Services, Inc., dated April 1, 2011. (00015951-00016031).
170. Memorandum from Gwenyth Thompson, Illinois EPA to Imran Syed, Illinois EPA, dated March 18, 2011. (00016032-00016039).
171. Email from Gwenyth Thompson, Illinois EPA, to Imran Syed, Illinois EPA, dated September 9, 2010. (00016040).
172. Email from Gwenyth Thompson, Illinois EPA to Imran Syed, Illinois EPA, dated September 13, 2010. (00016041-00016042).
173. Review notes of Imran Syed, Illinois EPA. (00016043-00016053).
174. Draft denial for Clinton Landfill 3 application Log No. 2010-268, dated September 19, 2010. (00016054-00016059).
175. Letter and attachments from Daniel J. Drommerhausen, Shaw Environmental, Inc. to Stephen Nightingale, Illinois EPA, dated May 27, 2010. (00016060-00016122).
176. Letter from Joyce A. Day, PDC Technical Services, to Stephen Nightingale, Illinois EPA, dated August 24, 2010. (00016123-00016125).
177. Letter from Daniel Drommerhausen, Shaw Environmental Solutions, to Imran Syed, Illinois EPA, dated September 27, 2010. (00016126-00016128).
178. Letter from Daniel Drommerhausen, Shaw Environmental, Inc., to Stephen Nightingale, Illinois EPA, dated October 27, 2010. (00016129-00016168).
179. Letter from Daniel Drommerhausen, Shaw Environmental, Inc. to Imran Syed, Illinois EPA, dated November 22, 2010. (00016169-00016171).

180. Letter from Daniel Drommerhausen, Shaw Environmental, Inc. to Imran Syed, Illinois EPA, dated December 21, 2010. (00016172-00016175).
181. Letter from Daniel Drommerhausen, Shaw Environmental, Inc. to Stephen Nightingale, Illinois EPA, dated January 27, 2011. (00016176-00016194).
182. Letter from Daniel Drommerhausen, Shaw Environmental, Inc. to Stephen Nightingale, Illinois EPA, dated February 18, 2011. (00016195-00016206).
183. Letter from Daniel Drommerhausen, Shaw Environmental, Inc. to Stephen Nightingale, Illinois EPA, dated March 3, 2011. (00016207-00016213).
184. Email and Inspection Report from Dustin Burger, Illinois EPA, to Imran Syed, Illinois EPA, dated March 15, 2011. (00016214-00016230).
185. Email from Robert Mathis, Illinois EPA, to Imran Syed, Illinois EPA, dated March 29, 2011. (00016231-00016231).
186. Review Notes of Imran Syed. (00016232-00016257).
187. Draft Denial for Clinton Landfill 3 Log No. 2011-024, dated February 4, 2011. (00016258-00016261).
188. Draft Denial for Clinton Landfill 3 Log No. 2011-024, dated March 7, 2011. (00016262-00016267).
189. CQA Report and Certification for Clinton Landfill 3, dated January 21, 2011. (00016268-00017767).
190. Letter from William N. Dicer, PDC Technical Services, Inc. to Stephen Nightingale, Illinois EPA, dated February 25, 2011. (00017768-00017804).
191. Letter from George L. Armstrong, PDC Technical Services, Inc. to Stephen Nightingale, Illinois EPA, dated March 10, 2011. (00017805-00017817).
192. Letter from George L. Armstrong, PDC Technical Services, Inc. to Stephen Nightingale, Illinois EPA, dated March 14, 2011. (00017818-00017827).

193. Additional Information Requested by the Illinois Environmental Protection Agency provided by SKS Engineers, Inc., dated March 15, 2011. (00017828-00017948).
194. Additional Information Application for Significant Modification, Permit No. 2005-070-LF, Log No. 2011-024, Clinton Landfill No. 3, dated March 18, 2011. (00017949-00018182).
195. Draft Denial email for Clinton Landfill 3 Log No. 2011-024, dated March 18, 2011. (00018183).
196. Letter from George L. Armstrong, PDC Technical Services, Inc. to Stephen Nightingale, Illinois EPA, dated March 18, 2011. (00018184-00018260).
197. Letter from Joyce A. Day, PDC Technical Services, Inc. to Illinois EPA, dated March 24, 2011. (00018261-00018302).
198. Email and attachments from Michael A. Smith to Imran Syed, dated March 18, 2011. (00018303-00018330).
199. Permit Modification No. 46 issued by Illinois EPA to Clinton Landfill, Inc., dated July 30, 2014. (00018331-00018424).
200. Review Notes of Imran Syed. (00018425-00018444).
201. Email and draft denial from Imran Syed, Illinois EPA, to Andrew Whelpley, PDC Technical Services, Inc., dated March 11, 2014. (00018445-00018447).
202. Notice of Application for Permit to Manage Waste, dated December 13, 2013. (00018448-00018453).
203. Application for Significant Modification by PDC Technical Services to Illinois EPA, dated December 13, 2013. (00018454-00018477).
204. Letter from Andrew Whelpley, PDC Technical Services, Inc. to Stephen Nightingale, Illinois EPA, dated March 14, 2014. (00018478-00018481).
205. Letter from Andrew Whelpley, PDC Technical Services, Inc. to Stephen Nightingale, Illinois EPA, dated April 14, 2014. (00018482-00018484).

206. Letter from Andrew Whelpley, PDC Technical Services, Inc. to Stephen Nightingale, Illinois EPA, dated May 13, 2014. (00018485-00018487).
207. Additional information submitted by PDC Technical Services, Inc. to Illinois EPA, dated May 16, 2014. (00018488-00018498).
208. Letter from Andrew Whelpley, PDC Technical Services, Inc. to Stephen Nightingale, Illinois EPA, dated May 16, 2014. (00018499-00018511).
209. Letter from Andrew Whelpley, PDC Technical Services, Inc. to Stephen Nightingale, Illinois EPA, dated June 13, 2014. (00018512-00018513).
210. Letter from Andrew Whelpley, PDC Technical Services, Inc. to Stephen Nightingale, Illinois EPA, dated July 10, 2014. (00018514-00018518).
211. Memorandum from Michael Summers, Illinois EPA, to Imran Syed, Illinois EPA, dated July 28, 2014. (00018519-00018521).
212. Review Notes of Imran Syed. (00018522-00018527).
213. Email from Bill Bicher, PDC Technical Services, Inc., to Imran Syed, Illinois EPA, dated June 30, 2014. (00018528-00018528).
214. Email from Joe Up, Illinois EPA, to Imran Syed, Illinois EPA, dated June 25, 2014. (00018529-00018531).
215. Draft denial for Clinton Landfill 3, Log No. 2013-145, dated June 30, 2014. (00018532-00018534).
216. General Application for Permit, dated April 17, 2014. (00018535-00018539).
217. Notice of Application for Permit to Manage Waste, dated April 18, 2014. (00018540).
218. Letter from William Bicher, PDC Technical Services, Inc., to Stephen Nightingale, Illinois EPA, dated April 18, 2014. (00018541-00018665).
219. Letter from William Bicher, PDC Technical Services, Inc., to Stephen Nightingale, Illinois EPA, dated June 6, 2014. (00018666-00018671).

220. Letter from William Bicher, PDC Technical Services, Inc. to Stephen Nightingale, Illinois EPA, dated July 1, 2014. (00018672-00018681).

Respectfully submitted,  
LISA MADIGAN,  
Attorney General of the  
State of Illinois,

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

By:



Jennifer A. Van Wie  
Stephen Sylvester  
Assistant Attorneys General  
Environmental Bureau  
69 West Washington Street, 18<sup>th</sup> Floor  
Chicago, Illinois 60602  
(312) 814-0609  
(312) 814-2087  
jvanwie@atg.state.il.us  
ssylvester@atg.state.il.us

**THIS FILING IS SUBMITTED ON RECYCLED PAPER**