



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276 • (217) 782-2829
PAT QUINN, GOVERNOR LISA BONNETT, DIRECTOR

July 31, 2014

CERTIFIED MAIL
7010 2780 0002 1196 6934

Clinton Landfill, Inc.
Attn: Mr. Ronald J. Welk
4700 North Sterling Avenue
P.O. Box 9071
Peoria, Illinois 61612-9071

Re: 0390055036 – DeWitt County
Clinton Landfill 3
Permit No. 2005-070-LF
Log No. 2014-359
Expiration Date: February 15, 2017
Permit File

Dear Mr. Welk:

In accordance with 35 Ill. Admin. Code 813.201(b), the Illinois Environmental Protection Agency is hereby modifying the permit granted to Clinton Landfill, Inc. as owner and operator. On February 5, 2008, the Agency received from Clinton Landfill, Inc. a permit application to modify Permit No. 2005-070-LF to create an area designated as a “chemical waste unit” that would accept wastes Clinton Landfill No. 3 was already permitted to accept as well as wastes it was not yet permitted to accept. The application did not contain a Certification of Siting Approval. Instead, Section 812.105 of the application stated that “[t]his application does not propose a new nor expansion to the currently permitted Clinton Landfill No. 3 and, therefore, local siting approval is not required for this permit modification.” On January 8, 2010, the Agency issued Permit Modification No. 9, which incorporated the information contained in the February 5, 2008 application. Since issuing Permit Modification No. 9, the Agency has received information indicating that the necessary local siting approval has not been granted for the modifications in Permit Modification No. 9.

This modification, which is Modification No. 47 and is designated in the Agency files as application Log No. 2014-359, includes several revisions to the introductory section included in Modification No. 46 to Permit No. 2005-070-LF. The introductory section of Modification No. 47 includes the following new language:

Under the provisions of 35 Ill. Adm. Code 813.201(b)(1), Modification No. 9 to Permit No. 2005-070-LF, which was originally issued on January 8, 2010 and approved development of the Chemical Waste Unit (CWU) at Clinton Landfill 3, is being revised, on July 31, 2014, through an Agency initiated modification (Modification No. 47) to prohibit acceptance of the following wastes at Clinton Landfill 3:

1. Manufactured Gas Plant (MGP) waste exceeding the regulatory levels specified in 35 Ill. Adm. Code 721.124(b) in the CWU; and
2. Polychlorinated Biphenyl (PCB) wastes, as defined in 40 Code of Federal Regulations (CFR) 761.3 in the CWU, unless:

- a. The local siting authority for Clinton Landfill 3 (currently the DeWitt County Board) grants local siting approval specifically allowing such waste to be disposed of in the CWU; and
- b. The U.S. Environmental Protection Agency (USEPA) approves the CWU as a “chemical waste landfill” as defined in 40 CFR 761.3.

Except for the differences indicated in the table below, the special conditions in Modification No. 47 are identical to the special conditions in Modification No. 46 to Permit No. 2005-070-LF, issued on July 30, 2014.

<u>Special Condition in Modification No. 46</u>	<u>Special Condition in Modification No. 47</u>	<u>Description of Modification</u>
<u>II.10.f</u>	<u>II.10.f</u>	<u>Amended to add obtaining local siting approval as a precondition to accepting PCB waste.</u>
<u>II.27.d and II.27.g</u>	<u>II.27.d and II.27.g</u>	<u>Revised to reference Modification No. 47 and Log No. 2014-359.</u>
<u>III.A.2.f</u>	<u>III.A.2.f</u>	<u>Amended to prohibit the disposal of Manufactured Gas Plant (MGP) waste exceeding the regulatory levels specified in 35 Ill. Adm. Code 721.124(b) in the CWU.</u>
<u>VII.12</u>	<u>VII.12</u>	<u>Amended to reflect the need to obtain local siting approval before accepting PCB waste and correct a typographical error.</u>
<u>VII.13</u>	<u>VII.13</u>	<u>Revised to correct a typographical error.</u>

In addition, Modification No. 47 includes the following revisions to the special conditions included in Modification No. 46 (added text is underlined; deleted text is ~~stricken~~):

Section II.10.f

- f. Only those types of polychlorinated biphenyls (PCB) wastes, as defined in 40 CFR 761.3 and subject to Toxic Substances Control Act (TSCA), that are allowed by 40 CFR Part 761 or TSCA to be disposed in a municipal solid waste landfill may be disposed in the MSW unit. PCB wastes which are allowed by 40 CFR 761 to be disposed in a “chemical waste landfill” as defined in 40 CFR 761.3 may be disposed in the CWU Unit, if and when all of the following conditions have been met:
 - i. The local siting authority for Clinton Landfill 3 (currently the DeWitt County Board) grants local siting approval specifically allowing such waste to be disposed of in the CWU;
 - ii. The U.S. Environmental Protection Agency (USEPA) permits the CWU as a “chemical waste landfill” as defined in 40 CFR 761.3;
 - iii. The CWU is constructed; and
 - iv. The Illinois EPA has approved operation authorization for the CWU, pursuant to 35 Ill. Adm. Code 813.203, allowing waste disposal to begin.

Section II.27.d

- d. The approximately 4.5 acres of Phase 1A of CWU, in accordance with application and plans provided in permit application Log Nos. 2011-024 and 2014-359 and approved by Modification Nos. 18 and 47, respectively;

Section II.27.g

- g. The approximately 1.64 acres of Phase 1A of CWU, in accordance with application and plans provided in permit application Log Nos. 2011-024, 2012-047 and 2014-359 and approved by Modification Nos.18, 28 and 47, respectively;

Section III.A.2.f

- f. CLARIFICATIONS:

Notwithstanding the exception for manufactured gas plant waste contained in 35 Ill. Adm. Code 721.124(a), no manufactured gas plant waste shall be disposed in Clinton Landfill 3's MSW unit or the CWU, unless: i) the waste has been tested in accordance with subsection (d) of this special condition, and ii) the analysis has demonstrated that the waste does not exceed the regulatory levels for any contaminant given in the table contained in 35 Ill. Adm. Code 721.124(b).

~~Manufactured gas plant waste exceeding the regulatory levels specified in 35 Ill. Adm. Code 721.124(b) can be disposed in the CWU.~~

Section VII.12


- 12. If and when the local siting authority for Clinton Landfill 3 grants local siting approval specifically allowing PCB waste to be disposed of in the CWU and the USEPA permits the CWU as a "chemical waste landfill" as defined in 40 CFR 761.3, leachate from the CWU must be managed in accordance with Condition No. VII.11 (a) and (b) of this permit. In the event the operator wants to transport leachate offsite for treatment and discharge under a NPDES permit, the operator shall provide written notification to the Illinois EPA, Bureau of Land, Permit Section that necessary approval has been obtained from the wastewater treatment plant to accept leachate from the CWU. The wastewater treatment facility must be made aware that PCB wastes which are allowed by 40 CFR 761 to be disposed in a "chemical waste landfill" as defined in 40 CFR 761.3 are being accepted in the CWU. This documentation shall be provided prior to commencement of shipping of leachate to the wastewater treatment plant and must include a copy of letter of approval from the wastewater treatment plant.

Section VII.13

13. Leachate from the CWU shall be pumped to the CWU leachate storage tank and managed in accordance with Condition No. VII.11. Leachate from the CWU shall not be recirculated in the MSW unit or in any way comingled with the leachate from the MSW unit.

This modification, which is Modification No. 47 and is designated in the Agency files as application Log No. 2014-359, is enclosed with this letter.

Sincerely,



Stephen F. Nightingale, P.E.
Manager, Permit Section
Bureau of Land

CTL
SFN:IMS:0390055036-811LF-SM47-2014359-CoverLtr.docx

IMS
Enclosures: Clinton Landfill 3 – Modification No. 47



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276 • (217)782-2829
PAT QUINN, GOVERNOR LISA BONNETT, DIRECTOR

217/524-3300

July 31, 2014

Clinton Landfill, Inc.
Attn: Mr. Ronald J. Welk
4700 North Sterling Avenue
P.O. Box 9071
Peoria, Illinois 61612-9071

Re: 0390055036 – DeWitt County
Clinton Landfill 3
Permit No. 2005-070-LF
Log No. 2014-359
Modification No. 47
Expiration Date: February 15, 2017
Permit Landfill 811 File
Permit Approval

Dear Mr. Welk:

Permit is hereby granted to Clinton Landfill, Inc. as owner and operator, approving the development of a new municipal solid waste and non-hazardous special waste landfill all in accordance with the application and plans prepared by George L. Armstrong, P.E. of PDC Technical Services, Inc. Final plans, specifications, application, and supporting documents, as submitted and approved, shall constitute part of this permit and are identified in the records of the Illinois Environmental Protection Agency (Illinois EPA), Bureau of Land, Division of Land Pollution Control by the permit number and log number designated in the heading above.

Specifically, Permit No. 2005-070-LF issued March 2, 2007 approved:

- a. The development of this landfill so as to comply with the applicable requirements of Title 35, Illinois Administrative Code (hereinafter 35 Ill. Adm. Code), Subtitle G, Parts 811 and 812, pursuant to 35 Ill. Adm. Code, Section 813.104;
- b. The development of a new Municipal Solid Waste Landfill (MSWLF) unit consisting of a 266.533 acre facility with a single waste disposal unit of approximately 157.451 acres with a gross airspace of approximately 32,014,225 cubic yards, including daily cover and intermediate cover; and excluding leachate sand drainage layer, sidewall liner protective soils and final cover. The maximum final elevation shall be approximately 870 feet above mean sea level. Based on the anticipated waste acceptance rate of 426,000 tons

Page 2

per year (compacted in place density of 1,200 lbs/cubic yard) the facility is estimated to have an operating life of 45 years;

- c. The lower waste boundaries and the waste footprint approved by this permit are shown on Drawing No. P-LCS1 entitled "Leachate Drainage and Collection Plan". The lower waste boundaries approved by this permit are defined by the top of liner grades shown on Drawing No. P-LCS1 plus 1-foot for the leachate sand drainage layer on the floor liner and 1.5-feet for the protective soils on the sidewall liner. The final contours approved by this permit are shown on Drawing No. P-FG4 entitled "Final Waste Grade Plan." Both Drawings are in the addendum dated June 9, 2006; and
- d. Acceptance of special waste streams without individual special waste stream authorizations, in accordance with the special conditions listed in Part III of this permit.

Modification No. 9 to Permit No. 2005-070-LF issued January 8, 2010¹ approved the reconfiguration of Clinton Landfill 3 into a Municipal Solid Waste (MSW) unit and a Chemical Waste Unit (CWU) as described below:

- a. The CWU covers approximately 22.495 acres in the southwestern corner of landfill. The MSW unit comprises the remainder of Clinton Landfill 3. A portion of the MSW unit overlies (piggybacks) the CWU. The MSW unit and CWU are not independent landfill units. They share a common groundwater monitoring network, will be certified to have completed closure together, and will have the same post-closure care period.
- b. After the CWU has been constructed and has received operating authorization from the Illinois EPA allowing waste disposal to begin, it will be able to accept a variety of non-hazardous industrial process wastes, non-hazardous pollution control wastes, certified non-special wastes, chemical wastes, inert wastes and putrescible wastes. Manufactured Gas Plant waste exceeding the regulatory levels specified in 35 Ill. Adm. Code 721.124(b) is among the waste that may be accepted at the CWU. The CWU will be able to accept Polychlorinated Biphenyl (PCB) wastes, as defined in 40 Code of Federal Regulations (CFR) 761.3, if the U.S. Environmental Protection Agency (USEPA) permits the CWU as a "chemical waste landfill" as defined in 40 CFR 761.3.
- c. The CWU will have a gross airspace (inclusive of daily and intermediate cover and the separation layer between the CWU and Municipal Solid Waste Unit, and exclusive of protective soil on sidewall liner and leachate drainage layer) of 2,529,506 cubic yards. Based on the anticipated waste acceptance rate of 75,000 tons per year (compacted in place density of 2000 lbs/cubic yard) the CWU is estimated to have an operating life of 34 years. The MSW unit covers approximately 146.453 acres (including the piggyback over CWU) and will have a gross airspace of 29,259,566 cubic yards. The MSW unit is

¹Modification No. 9 is being revised through an Agency initiated modification, designated as Modification No 47.

Page 3

estimated to have an operating life of 41 years at the anticipated waste acceptance rate of 426,000 tons per year (compacted in place density of 1200 lbs/cubic yard).

- d. A composite liner system in the CWU consists of 3-foot thick compacted soil liner with a maximum permeability of 1×10^{-7} cm/sec, 60-mil high density polyethylene (HDPE) textured geomembrane, a geocomposite drainage layer and a second layer of 60-mil HDPE textured geomembrane throughout the CWU. The floor and the lower portions of the sidewall also include a geosynthetic clay liner and a third 60-mil HDPE textured geomembrane. The liner system in the MSW unit approved in Permit No. 2005-070-LF remains unchanged.
- e. The lower waste boundaries and waste footprint for the CWU are shown on the Drawing No. D7 entitled "Proposed Leachate Collection Grades" provided in Attachment 6 of application Log No. 2008-054, addendum dated June 10, 2009. The final contours for the landfill are the same as those approved in Permit No. 2005-070-LF.
- f. Modification No. 9 also made the following changes, associated with the CWU, to Permit No. 2005-070-LF:
 - i. An Operating Plan for CWU.
 - ii. Revised closure/post-closure care plan and cost estimates.
 - iii. Revised geomembrane and geocomposite drainage layer specifications; and
 - iv. Revision of the gas management system to exclude gas collection from within the CWU unless and until problems with gas from the CWU occur.

Under the provisions of 35 Ill. Adm. Code 813.201(b)(1), Modification No. 9 to Permit No. 2005-070-LF, which was originally issued on January 8, 2010 and approved development of the Chemical Waste Unit (CWU) at Clinton Landfill 3, is being revised, on August 1, 2014, through an Agency initiated modification (Modification No. 47) to prohibit acceptance of the following wastes at Clinton Landfill 3:

1. Manufactured Gas Plant (MGP) waste exceeding the regulatory levels specified in 35 Ill. Adm. Code 721.124(b) in the CWU; and
2. Polychlorinated Biphenyl (PCB) wastes, as defined in 40 Code of Federal Regulations (CFR) 761.3 in the CWU, unless:
 - a. The local siting authority for Clinton Landfill 3 (currently the DeWitt County Board) grants local siting approval specifically allowing such waste to be disposed of in the CWU; and

- b. The U.S. Environmental Protection Agency (USEPA) approves the CWU as a “chemical waste landfill” as defined in 40 CFR 761.3.

Except for the differences indicated in the table below, the special conditions in Modification No. 47 are identical to the special conditions in Modification No. 46 to Permit No. 2005-070-LF, issued on July 30, 2014.

Special Condition in Modification No. 46	Special Condition in Modification No. 47	Description of Modification
II.10.f	II.10.f	Amended to add obtaining local siting approval as a precondition to accepting PCB waste.
II.27.d and II.27.g	II.27.d and II.27.g	Revised to reference Modification No. 47 and Log No. 2014-359.
III.A.2.f	III.A.2.f	Amended to prohibit the disposal of Manufactured Gas Plant (MGP) waste exceeding the regulatory levels specified in 35 Ill. Adm. Code 721.124(b) in the CWU.
VII.12	VII.12	Amended to reflect the need to obtain local siting approval before accepting PCB waste and correct a typographical error.
VII.13	VII.13	Revised to correct a typographical error.

Pursuant to Section 39(a) of Illinois Environmental Protection Act (Act) [415 ILCS 5/39(a)] and 35 Ill. Adm. Code, 813.104(b), this permit is issued subject to the development, operating and reporting requirements for non-hazardous waste landfills in 35 Ill. Adm. Code, Parts 810, 811, 812 and 813, the standard conditions attached hereto, and the following special conditions. In case of conflict between the permit application and these conditions (both standard and special), the conditions of this permit shall govern.

I. CONSTRUCTION QUALITY ASSURANCE

- 1. All necessary surface drainage control facilities shall be constructed prior to other disturbance in any area.
- 2. No part of the unit shall be placed into service or accept waste until an acceptance report for all the activities listed below has been submitted to and approved by the Illinois EPA as a significant modification pursuant to 35 Ill. Adm. Code, Sections 811.505(d) and 813.203.
 - a. Preparation of the subgrade and foundation to design parameters;

Page 5

- b. Installation of the compacted earth/synthetic liner;
 - c. Installation of the leachate drainage, collection and management systems;
 - d. Placement of final cover;
 - e. Installation of leachate re-circulation system;
 - f. Installation of gas control facilities, except as provided in Condition No. IX.11 of this permit;
 - g. Construction of ponds, ditches, lagoons and berms; and
 - h. Construction of cutoff trench.
3. The permittee shall designate an independent third party contractor as the Construction Quality Assurance (CQA) Officer(s). The CQA Officer(s) shall be an Illinois Certified Professional Engineer who is independent from and not under the control or influence of the operator, any employee of the operator, or any other corporation, company or legal entity that is a subsidiary, affiliate, parent corporation or holding corporation associated with the operator.
 4. Except as provided below, the CQA Officer(s) designated pursuant to Condition I.3 shall personally be present during all construction and testing that is subject to CQA certification pursuant to 35 Ill. Adm. Code, Section 811.503(a). If the CQA Officer(s) is unable to be present as required, then a written explanation and signed statement must be provided for each absence pursuant to 35 Ill. Adm. Code, Section 811.503(b).
 5. The clay liner shall be tested for density and moisture content a minimum of five tests per lift per acre.
 6. A minimum of one laboratory hydraulic conductivity test shall be performed for every 10,000 cubic yards of soil placed in the liner. Additionally, each lift of the soil liner shall be tested for hydraulic conductivity at least once for each phase of construction.
 7. If the clay portion of the liner is exposed to freezing conditions, it must be recertified. The designated CQA Officer(s) shall then certify that the clay portion of the liner and all necessary repairs to the liner geomembrane and leachate drainage layer meet the required design standards. This certification must be provided to the Illinois EPA prior to disposal of waste on the subject portion of the liner. If operating authorization has not yet been issued for that area, the

recertification shall be included in the application for Significant Modification of Permit to obtain Operating Authorization for that area.

8. Pursuant to 35 Ill. Adm. Code, Section 811.505(d), upon completion of construction of each major phase, the CQA Officer(s) shall submit an acceptance report to the Illinois EPA. The acceptance report shall be submitted before the structure is placed into service and shall contain the following:
 - a. A certification by the CQA Officer(s) that the construction has been prepared and constructed in accordance with the engineering design;
 - b. As-built drawings; and
 - c. All daily summary reports.
9. Construction of Sidewall Liner:
 - a. The operator shall maintain a minimum "freeboard" of one (1) foot between the top of the sidewall liner and the top of the waste;
 - b. Prior to installing an increment of the sidewall liner, the sidewall liner in that area shall be inspected. Any areas damaged by desiccation, frost action, etc. shall be excavated and reconstructed in accordance with the Construction Quality Assurance program approved by this permit;
 - c. After each increment of the composite liner up the sidewall is completed, the operator shall provide written notification of its completion to the Illinois EPA's Champaign Regional Office. Upon receipt of the notification, the inspector shall be allowed fifteen working days to examine the construction. The Illinois EPA is not obligated to approve the construction or certification. The operator may dispose of refuse in the subphase after the fifteen day period if, having complied with the terms of this condition, the operator is not informed of a problem by the Illinois EPA or its agents; and
 - d. At the same time the Champaign Regional Office or delegated government is given notification that an increment of the sidewall liner has been completed, the Permit Section shall be provided with the information required in an Acceptance Report pursuant to 35 Ill. Adm. Code, 811.505(d) on its construction.
10. Applications for operating authorization shall not be made for areas of less than 1.5 acre increments of constructed liner.

11. All stakes and monuments marking the facility boundary and the permitted disposal area shall be maintained, inspected annually and surveyed no less frequently than once in five years by a professional land surveyor. Any lost or damaged monuments shall be replaced.
12. All standards for testing the characteristics and performance of materials, products, systems and services shall be those established by the American Society for Testing and Materials (ASTM) unless otherwise stated in the permit application.
13. Effective upon issuance of Modification No. 26 (Log No. 2011-424), all testing including conformance and seaming of the geomembrane used at the landfill shall meet Geosynthetic Research Institute's requirements with the following exceptions: For the geomembrane used in the bottom liner, the minimum thickness must be within 5% of nominal for all samples, i.e. 60 mil liner must be at least 57 mil; and UV resistance testing is not necessary unless the geomembrane is exposed for more than 30 days.
14. A cutoff trench shall be installed at the toe of the landfill invert sidewalls, along the eastern and southern edges of the MSW unit, as shown on Drawings P-EX1 and P-EX2, submitted in application Log No. 2005-070, addendum dated June 9, 2006. As proposed in application Log No. 2008-054, addendum dated August 18, 2009, the cutoff trench shall be installed along the southern edge of the CWU if Upper Radnor Till Sand is encountered during future investigations along the southern boundary of CWU. The cutoff trench material, placement and compaction shall meet the Earth Liner specifications of the CQA plan.
15. Notwithstanding the survey tolerances for the landfill liner and final cover grades included in the CQA plan and design drawings, the as-built top of liner grades shall not be below the approved design grades and the as-built final waste grades shall not be above the approved design grades.
16. Prior to placement of waste (on the cell floor) or protective soil layer (against the sidewall) in areas of the landfill that have been approved for waste disposal, the filter geotextile must be inspected for any signs of damage or degradation due to exposure. All geotextiles showing signs of damage or degradation must be replaced before being covered with waste or protective soils.
17. The 18-inch protective soil layer atop the landfill liner sideslopes may be placed in increments. The inspection, documentation and notification requirements specified in Condition Nos. I.9 and I.16 of this permit apply to the placement of protective soil layer on the liner sideslopes as well.

II. OPERATING CONDITIONS

1. Pursuant to 35 Ill. Adm. Code, Sections 811.107(a) and 811.107(b), throughout the operating life of this landfill, waste shall not be placed in a manner or at a rate which results in unstable internal or external slopes or interference with construction, operation or monitoring activities.
2. The operator of this solid waste facility shall not conduct the operation in a manner which results in any of the following:
 - a. refuse in standing or flowing waters;
 - b. leachate flows entering waters of the State;
 - c. leachate flows exiting the landfill confines (i.e., the facility boundaries established for the landfill in a permit or permits issued by the Illinois EPA);
 - d. open burning of refuse in violation of Section 9 of the Act;
 - e. uncovered refuse remaining from any previous operating day or at the conclusion of any operating day, unless authorized by permit;
 - f. failure to provide final cover within time limits established by Board regulations;
 - g. acceptance of wastes without necessary permits;
 - h. scavenging as defined by Board regulations;
 - i. deposition of refuse in any unpermitted (i.e., without an Illinois EPA approved significant modification authorizing operation) portion of the landfill;
 - j. acceptance of a special waste without a required manifest and identification record;
 - k. failure to submit reports required by permits or Board regulations;
 - l. failure to collect and contain litter from the site by the end of each operating day; and

Page 9

- m. failure to submit any cost estimate or any financial assurance mechanism for the facility as required by Section 21.o.13 of the Act.
3. Moveable, temporary fencing shall be used to prevent blowing litter when the refuse is above the natural ground line.
4. At the end of each day of operation, all exposed waste shall be covered with:
 - a. Clean soil at least six (6) inches thick (i.e., conventional daily cover);
 - b. Polypropylene non-woven and woven geotextile such as Fabrisoil, Typar 3601, Amoco 2002 or their equivalents;
 - c. Cement kiln by-products;
 - d. Chipped or shredded tires;
 - e. Clean concrete debris;
 - f. Clean demolition debris;
 - g. Coal combustion by-products;
 - h. End product compost;
 - i. Foundry castings;
 - j. Foundry sand;
 - k. Non-hazardous contaminated soil;
 - l. Paper pulp;
 - m. Processed asphalt shingles;
 - n. Refractory brick;
 - o. Solidified leachate;
 - p. Wastewater treatment plant (WWTP) sludge;
 - q. Wood chips; or
 - r. Crushed cathode ray tube (CRT) panel glass.

Page 10

5. The materials listed in Special Condition II.4(b) through (r) are approved as alternate daily cover materials (ADCM) pursuant to 35 Ill. Adm. Code, Sections 811.106(b) and 812.111(b). Use of ADCMs shall be subject to the following conditions:
 - a. If any ADCMs other than those approved by this permit are to be used, their use must be approved by the Illinois EPA through the permit process;
 - b. At any one time, the total area, using ADCMs, shall be no more than 7,500 square yards. Beyond this maximum, daily cover soil shall be used on all areas where waste has been disposed and to which intermediate or final cover has not been applied;
 - c. Unless otherwise specified below, areas upon which ADCM has been used must be covered with either conventional cover or additional waste within ten (10) calendar days of initial application;
 - d. Conventional daily cover in accordance with 35 Ill. Adm. Code 811.106(a) shall be used if weather or other conditions adversely affect the ability of the ADCMs to prevent problems with blowing litter, fire, odors, or vectors;
 - e. Only conventional soil daily cover and polypropylene geotextile products mentioned in Condition No. II.4(b) shall be used as daily cover within the Chemical Waste Unit;
 - f. All ADCMs, with the exception of manufactured ADCMs included in Condition No. II.4(b), shall be applied in continuous layers at least six-inches thick;
 - g. Geotextile fabric shall be anchored adequately to prevent wind damage. If the geotextile fabric is torn during or after placement, it must be repaired immediately or the damaged area must be covered with six inches of daily cover soil. If tires are used as weights for the geotextile fabric, they shall be converted tires, in accordance with 35 Ill. Adm. Code, Part 848: Management of Used and Waste Tires;
 - h. When an ADCM is applied, the operator shall keep a record including a description of the weather conditions, the type of alternate daily cover used and its performance. A summary of this information shall be provided with this facility's annual reports;
 - i. Any ADCM which has been used for daily cover may not be reused for any purpose (including road underlayment and erosion control) outside of permitted disposal boundaries;

Page 11

- j. All ADCMs must meet the requirements of 35 Ill. Adm. Code, 811.106(b)(1) through (4) at all times;
- k. The condition of the alternate materials used as daily cover shall be inspected at the beginning of each shift to determine if its integrity or continuity has been damaged by sun exposure, wind or physical contact. If the inspection reveals that the structural integrity or continuity has been damaged or if uncovered refuse is observed in the covered areas the damaged or uncovered areas shall be repaired immediately to restore a continuous uniform cover over the waste. If any problems develop from covering the waste with a particular alternate cover, the use of offending cover shall immediately cease until the cause of the problem is determined and necessary corrective action taken. A record of the inspection and subsequent corrective action taken shall be made available to the Illinois EPA personnel upon request;
- l. If the Illinois EPA's Champaign Regional Office determines that any ADCM is not performing satisfactorily as daily cover, the operator shall cease using it as daily cover immediately upon receipt of a written notification of such determination and manage the material appropriately;
- m. Special wastes received at the site to be used as ADCM shall be transported to the facility using the Illinois EPA's special waste manifest system. Additionally, these ADCMs shall meet all the applicable conditions specified in Section III of this permit and comply with the facility's load checking program. Section 22.48 of the Act allows for the de-classification of certain special wastes;
- n. All runoff from the ADCM areas shall be directed to the leachate collection system and treated as leachate. ADCM shall only be used in areas of the landfill where leachate flowing off the cover would drain into the leachate collection system and not to surface water, e.g., never place ADCMs on outside slopes;
- o. The following conditions apply for the management of stockpiles of materials to be used as alternate daily covers:
 - i. The following ADCMs may be stockpiled in an amount not to exceed ten (10) day supply for use as daily cover: chipped or shredded tires, clean concrete debris, clean demolition debris, end product compost, foundry castings, processed asphalt roof shingles, refractory brick and wood chips. All other ADCMs (except for the manufactured ADCMs listed in Condition No. II.4(b)) shall be used for daily cover or disposed in the active face of the landfill by the end of the same operating day;
 - ii. The stockpiles shall be located as close as practicable to the active face in an area with a certified liner and leachate collection system. All runoff from the stockpiles shall be managed as leachate;

- iii. ADCMs shall not be stockpiled on areas of the landfill that have received final cover;
 - iv. ADCMs shall not be stockpiled in areas of the landfill that would result in exceedence of permitted final waste elevations; and
 - v. The stockpiles shall be managed so as to avoid development of nuisance conditions including blowing litter, fire potential, malodors etc
- p. The use of cement kiln by-products, coal combustion by-products and foundry sand as ADCM is subject to the following conditions:
- i. No stockpiling of cement kiln by products, coal combustion by-products and foundry sand is allowed. All the materials received each day must be used as daily cover or disposed off in the active face of the landfill;
 - ii. Foundry sand used as ADCM shall meet the Waste Classification Limits of a Beneficially Usable Waste or a Potentially Usable Waste defined in 35 Ill. Adm. Code Part 817;
 - iii. Cement kiln by-products, coal combustion by-products and foundry sand once applied as ADCM shall not be removed;
 - iv. Measures shall be taken to prevent dust-related problems. These measures may include use of the cement kiln by-products, coal combustion by-products and foundry sand below surrounding grade, receiving the materials in a damp condition and use only when weather conditions (wind) will not cause fugitive dust emissions. "Wetting" disposal areas covered with cement kiln by-products, coal combustion by-products or foundry sand is prohibited; and
 - v. Areas where cement kiln by-products and coal combustion by-products are used as ADCM must be covered with either conventional daily cover or additional waste within 24-hours of initial placement.
- q. Chipped or shredded tires used as ADCM shall be managed in accordance with 35 Ill. Adm. Code Part 848, Management of Used and Waste Tires and shall be no larger than 2 inches in size. Chipped or shredded tires once applied as ADCM shall not be removed;
- r. The use of clean concrete debris and clean demolition debris as ADCM is subject to the following conditions:
- i. Only clean construction and demolition debris, as defined in Section 3.160(b) of the Act, may be used as ADCM;
 - ii. Clean concrete debris and clean demolition debris utilized as ADCM shall be processed to a gradation of less than 2 inches;
 - iii. If necessary, measures shall be taken to prevent dust-related problems. These measures may include use of clean concrete debris and clean demolition debris below surrounding grade and use only when weather conditions (wind) will not cause fugitive dust emissions. "Wetting"

- disposal areas covered with Clean concrete debris and clean demolition debris is prohibited; and
- iv. During removal of clean concrete debris and clean demolition debris used as ADCM for the purpose of reuse, measures shall be taken to keep the collected materials free of refuse. Collected clean concrete debris and clean demolition debris which contains visible quantities of waste materials may not be stockpiled for reuse unless the waste materials are removed to the active face of the landfill.
 - s. The use of End Product Compost as ADCM is subject to the following conditions:
 - i. End product compost used as ADCM shall meet the definition of End Product Compost found in 35 Ill. Adm. Code 830.102;
 - ii. The end product compost shall be thoroughly biodegraded to the point such that odors emanating from the material are not in violation of 35 Ill. Adm. Code 811.106(b), and the potential for fire sustainment is minimized;
 - iii. End product compost may be used in combination with clean soil as a mixture to improve the performance as daily cover and to prevent odor problems; and
 - iv. During removal of end product compost ADCM for the purpose of reuse, measures shall be taken to keep the collected end product compost free of refuse materials. Collected end product compost which contains visible quantities of waste materials may not be stockpiled for reuse unless the waste materials are removed to the active face of the landfill.
 - t. Foundry castings and refractory brick must be sized 2 inches or less to ensure that the requirements of 811.106(b) are met. Foundry castings and refractory brick once applied as ADCM shall not be removed;
 - u. Paper pulp once applied as ADCM shall not be removed. Additionally, no stockpiling of paper pulp is allowed. All the materials received each day must be used as daily cover or disposed of in the active face of the landfill;
 - v. Only non-hazardous materials that can be legally disposed in this municipal solid waste and non-hazardous special waste landfill may be used as ADCM;
 - w. The following conditions apply to non-hazardous contaminated soil used as ADCM:
 - i. Contaminated soil with obnoxious odors or soil with debris shall not be used as ADCM;
 - ii. No soils from manufactured gas plant (MGP) remediation sites shall be used as ADCM;

- iii. Each load of non-hazardous contaminated soil to be used as ADCM shall be inspected to ensure that its use will not generate odors and will prevent threat of fires. The operator shall maintain a log of these inspections including, but not limited to, the date, a description of soil contaminant, the generator name, number and address; and the amount in cubic yards. The logs shall be made part of the operating record and shall be available for Illinois EPA inspection upon request ;
 - iv. No stockpiling of non-hazardous contaminated soil is allowed. All the materials received each day must be used as daily cover or disposed of in the active face of the landfill;
 - v. Non-hazardous contaminated soil must be of a moisture content, consistency and gradation that the requirements of 35 Ill. Adm. Code 811.106(b) are met; and
 - vi. Once placed, non-hazardous contaminated soil used as ADCM shall not be removed.
- x. Processed asphalt shingles shall be non-asbestos and free of metals, wood, and other deleterious materials and sized 2 inches or less. Asphalt shingles once applied as ADCM shall not be removed;
- y. The following conditions apply to solidified leachate used as ADCM:
- i. Only leachate solidified at this landfill's MSW Unit can be used as ADCM;
 - ii. Only leachate solidified with reagents listed in Condition No. III.B.6(a) and soil may be used as ADCM. Leachate solidified with absorbents (with the exception of soil) shall not be used as ADCM;
 - iii. No stockpiles of solidified leachate shall be maintained. Solidified leachate removed from the solidification unit shall be applied as ADCM or disposed of in the active face by the end of the same operating day;
 - iv. Solidified leachate once applied as ADCM shall not removed; and
 - v. Solidified leachate shall be covered with either conventional soil daily cover or additional waste within a 24-hour period of initial placement.
- z. The following conditions apply to wastewater treatment plant (WWTP) sludge as ADCM:
- i. The WWTP sludge must meet the definition of 'Digested Sludge' contained in 35 Ill. Adm. Code 391.102;
 - ii. The WWTP sludge must contain at least 50% solids when it is received at the landfill;
 - iii. WWTP sludge containing the minimum 50% solids shall be mixed with clean soil at a ratio of 50% sludge to 50% soil;
 - iv. As the percentage of solids increase, the mixing ratio with soil may decrease, but in no case shall be less than 90% sludge to 10% soils;

- v. WWTP sludge must always be blended with sufficient clean soil to ensure compliance with the requirements of 35 Ill. Adm. Code 811.106(b);
 - vi. WWTP sludge once applied as ADCM shall not be removed;
 - vii. Areas where WWTP sludge is used as ADCM must be covered with either conventional daily cover or additional waste within 24-hours of initial placement;
 - viii. No stockpiling of WWTP sludge is allowed. All the materials received each day must be used as daily cover or disposed of in the active face of the landfill;
 - ix. A sample of WWTP sludge used at this facility shall be tested for the parameters included in 35 Ill. Adm. Code Subtitle C Section 391.501(a). This information shall be included in the facility annual report; and
 - x. Any vehicle used for transporting WWTP sludge to the landfill shall be covered to prevent spillage or windblown particles.
- aa. The following conditions apply to wood chips used as ADCM:
- i. Wood chips used as ADCM shall be from clean non-waste commodity wood that does not exhibit dust, odor, and other nuisance problems. Furthermore, the wood shall not contain any painted or treated wood;
 - ii. Wood chips utilized as ADCM shall be processed to a gradation of less than 2-inches;
 - iii. Areas where wood chips is used as ADCM must be covered with either conventional daily cover, another type of approved ADCM, or additional waste, within 24-hour period of initial placement; and
 - iv. During removal of wood chips as ADCM for the purpose of reuse, measures shall be taken to keep the collected wood chips free of refuse materials. Collected wood chips which contain visible quantities of waste materials may not be stockpiled for reuse unless the waste materials are removed to the active face of the landfill.
- ab. The following conditions apply to crushed Cathode Ray Tube (CRT) panel glass used as ADCM:
- i. CRT panel glass is a special waste and shall be managed in accordance with Section III.A of this permit. Furthermore, the generator self-certification procedure described in Section 22.48 of the Act cannot be used to make it a non-special waste;
 - ii. The landfill is prohibited from receiving CRT glass or CRT glass residue that is a hazardous waste as defined in 35 Ill. Adm. Code 721.103 and all CRT glass or CRT glass treatment residue at the landfill must comply with the applicable requirements of 35 Ill. Adm. Code 728.107;
 - iii. CRT panel glass generated only at Materials Processing Corporation (MPC) located in Mendota Heights, Minnesota can be use as ADCM. CRT panel glass from any other generator(s), recycler(s), or broker(s) will have to be approved by the Illinois EPA through the permit process prior

- iv. to its use as ADCM;
 - iv. The operator shall review recycler's method and procedures for separating panel and funnel glass to verify efficacy of the process; request and review all existing TCLP analytical data that represent the panel glass; and require at least one additional TCLP metals analysis to independently check generator's data. The frequency of independent TCLP testing shall be in accordance the testing frequency described in addendum dated September 9, 2013 for application Log No. 2013-304. The operator shall keep these records at the facility for inspection by the Illinois EPA upon request;
 - v. CRT panel glass utilized as ADCM shall be processed to a gradation of less than 2-inches and applied at a minimum thickness of 6 inches;
 - vi. Once applied as alternate daily cover, crushed CRT panel glass shall not be removed;
 - vii. Areas where CRT panel glass was used as ADCM must be covered with either conventional soil daily cover or additional waste within a 24-hour period of initial placement; and
 - viii. No stockpiling of CRT panel glass is allowed. All CRT panel glass received each day must be used as ADCM or disposed of at the active face.
6. No later than 60 days after placement of the final lift of waste in any area, the area shall receive a final cover system meeting the design specifications approved in Permit No. 2005-070-LF. The final cover system for the entire facility consists of the following layers from bottom of cover to top of cover:
- 12-inches of soil foundation layer
 - 12-inches of compacted clay with hydraulic conductivity no greater than 1×10^{-7} cm/sec.
 - 40-mil HDPE geomembrane (textured on the sideslopes)
 - Drainage layer consisting of a geotextile and HDPE geonet. [Alternatively, a geocomposite drainage layer can be used.]
 - 3-foot thick protective cover capable of supporting vegetation.
7. All waste not covered within sixty days of placement with additional waste or final cover shall have an intermediate cover of compacted clean soil with a minimum thickness of one foot applied to it.
8. The operator shall implement a load checking program that meets the requirements of 35 Ill. Adm. Code, Section 811.323. If regulated hazardous waste is discovered, the Illinois EPA shall be notified no later than 5:00 p.m. the next business day after the day it is detected. The load checker shall prepare a

report describing the results of each inspection. A summary of these reports shall be submitted to the Illinois EPA as part of this facility's annual report.

9. Acceptance of Asbestos Containing Waste Materials (ACWM) shall be subject to the procedures for safe handling and management of friable and non-friable ACWM provided in application Log No. 2010-145 (Modification No. 12) and requirements of National Emission Standards for Hazardous Air Pollutants (NESHAPS).
10. Management of Unauthorized Waste
 - a. Landscape waste found to be mixed with municipal waste will be removed the same day and transported to a facility that is operating in accordance with the Act, Title V, Section 21;
 - b. Lead-acid batteries will be removed the same day and transported either to a drop-off center handling such waste, or to a lead-acid battery retailer;
 - c. Potentially infectious medical waste (PIMW) found to be mixed with municipal waste shall be managed in accordance with 35 Ill. Adm. Code, Subtitle M;
 - d. Tires found to be mixed with municipal waste shall be removed and managed in accordance with 35 Ill. Adm. Code, Part 848;
 - e. White good components mixed with municipal waste shall be removed and managed in accordance with Section 22.28 of the Act;
 - f. Only those types of polychlorinated biphenyls (PCB) wastes, as defined in 40 CFR 761.3 and subject to Toxic Substances Control Act (TSCA), that are allowed by 40 CFR Part 761 or TSCA to be disposed in a municipal solid waste landfill may be disposed in the MSW unit. PCB wastes which are allowed by 40 CFR 761 to be disposed in a "chemical waste landfill" as defined in 40 CFR 761.3 may be disposed in the CWU Unit, if and when all of the following conditions have been met:
 - i. The local siting authority for Clinton Landfill 3 (currently the DeWitt County Board) grants local siting approval specifically allowing such waste to be disposed of in CWU;
 - ii. The U.S. Environmental Protection Agency (USEPA) permits the CWU as a "chemical waste landfill" as defined in 40 CFR 761.3;
 - iii. The CWU is constructed; and

- iv. The Illinois EPA has approved operation authorization for the CWU, pursuant to 35 Ill. Adm. Code 813.203, allowing waste disposal to begin.
- g. No liquid waste (special or non-special) as determined by the Paint Filter Test shall be disposed unless the waste is from a household or is in a small container similar in size to that normally found in household waste and the container was designed for use other than storage. The prohibition applies to on-site generated wastes except for leachate or gas condensate that is specifically approved by permit for recirculation into the landfill. However, minor amounts of liquid resulting from precipitation (rain, sleet, hail or snow) during transport and disposal operations shall not be construed as a violation of this condition;
- h. In accordance with Section 21.6 of the Act, beginning July 1, 1996, no owner or operator of a sanitary landfill shall accept liquid used oil for final disposal that is discernable in the course of prudent business operation;
- i. After the unauthorized waste has been removed, a thorough cleanup of the affected area will be made according to the type of unauthorized waste managed. Records shall be kept for three (3) years and will be made available to the Illinois EPA; and
- j. In accordance with Subsection 95(b) of the Electronics Products Recycling and Reuse Act (415 ILCS 150), beginning January 1, 2012, no person may knowingly cause or allow the disposal of a CED [covered electronic device] or any other computer, computer monitor, printer, television, electronic keyboard, facsimile machine, videocassette recorder, portable digital music player, digital video disc player, video game console, electronic mouse, scanner, digital converter box, cable receiver, satellite receiver, digital video disc recorder, or small-scale server in a sanitary landfill, except as may be allowed by a waiver obtained pursuant to Subsection 95(e) of the Electronics Products Recycling and Reuse Act; and
- k. In accordance with Section 22.54(a) of the Illinois Environmental Protection Act (415 ILCS 5/1 et seq.), beginning January 1, 2014: *No owner or operator of a sanitary landfill that is located within a 25-mile radius of a site where asphalt roofing shingles are recycled under a Beneficial Use Determination (BUD) issued by the Agency pursuant to Section 22.54 of this Act shall accept for disposal loads of whole or processed asphalt roofing shingles. Nothing in this Section [Section 22.54a] shall prohibit or restrict a sanitary landfill from accepting for*

disposal asphalt roofing shingles that are commingled with municipal waste, including, but not limited to, general construction or demolition debris. A map showing the locations of the permitted, operating, non-hazardous waste landfills in Illinois with respect to the sites that have current BUD's from the Agency to recycle asphalt roofing shingles can be viewed at:

<http://www.arcgis.com/home/webmap/viewer.html?webmap=0647481cd5b24af4978df042ddb25b58&extent=-94.3475,36.6842,-83.7567,42.7614> .

11. Operating hours are those hours during which waste may be accepted. For this facility, the operating hours shall be limited to 6:00 a.m. to 6:00 p.m., Monday through Friday, and 6:00 a.m. to 3:00 p.m. on Saturday. Adequate lighting shall be provided for outdoor activities at the landfill occurring before sunrise or after sunset.
12. If it is required for the facility to be open beyond normal operating hours to respond to emergency situations, a written record of the date(s), times and reason the facility was open shall be made part of the operating record for the facility. The Illinois EPA Champaign Regional Office and, when applicable, the county authority responsible for inspections of this facility per a delegation agreement with the Illinois EPA shall be notified no later than 5:00 p.m. the next business day following the acceptance of waste outside the specified operating hours.
13. Road building materials used to construct roads at the facility that are not solid waste may be stockpiled on-site in the amount estimated to be needed within the next construction season provided they are managed in accordance with 35 Ill. Adm. Code, Section 811.108(c)(1).
14. Equipment shall be maintained and available for use at the facility during all hours of operation to allow proper operation of the landfill. If breakdowns occur that would prevent proper facility operation, back-up equipment shall be brought onto the site.
15. All utilities, including but not limited to heat, lights, power, communications equipment and sanitary facilities necessary for safe, efficient and proper operation of the landfill shall be available at the facility at all times.
16. Waste shall be deposited at the fill face and compacted upward into the fill face unless precluded by extreme weather conditions or for reasons of safety.
17. The operator shall implement methods for controlling dust so as to prevent wind dispersal of particulate matter off-site.

Page 20

18. The facility shall be constructed and operated to minimize the level of equipment noise audible outside the facility. The facility shall not cause or contribute to a violation of 35 Ill. Adm. Code, Parts 900 through 905.
19. The operator shall implement measures to control the population of disease and nuisance vectors.
20. The operator shall institute fire protection measures in accordance with the proposed Hazard Protection and Emergency Response Plan.
21. The operator shall implement methods to prevent tracking of mud by hauling vehicles onto public roadways.
22. Access to the active area and all other areas within the boundaries of the facility shall be controlled by use of fences, gates and natural barriers to prevent unauthorized entry at all times.
23. A permanent sign shall be maintained at the facility entrance containing the information required under 35 Ill. Adm. Code, Section 811.109(b)(1) through (5).
24. Waste received at the MSW Unit and CWU must be handled, analyzed, documented and disposed in accordance with the approved Operating Plans. Operating Plan for the CWU was provided in application Log No. 2011-505, addendum dated June 21, 2012 and approved in Modification No. 29. Operating Plan for the MSW Unit was provided in application Log No. 2013-496 and approved in Modification No. 44.
25. As proposed in the Operating Plan for the CWU, all waste loads destined for disposal in the CWU shall be inspected. The inspections shall ascertain that the waste does not contain any unacceptable materials, meets the waste acceptance criteria specified in the Operating Plan for CWU and is in accordance with the Special Conditions included in Section III.A of this permit. The information and observations derived from these inspections shall be recorded in accordance with 35 Ill. Adm. Code 811.323(c)(2).
26. If any regulated hazardous wastes are identified during load checking, they should be handled in accordance with 35 Ill. Adm. Code 811.323(d).
27. Waste disposal operations shall be restricted to areas of the landfill specifically approved by the Illinois EPA for operation or granted operating authorization pursuant to 35 Ill. Adm. Code, Section 813.203. Such areas of the landfill are presently limited to:

- a. The approximately 6.65 acres of Phase 1A of MSW Unit, in accordance with the application and plans provided in permit application Log No. 2008-063 and approved by Modification No. 5;
 - b. The approximately 4.15 acres of Phase 1B of MSW Unit, in accordance with the application and plans provided in permit application Log No. 2009-564 and approved by Modification No. 10;
 - c. The approximately 2.84 acres of Phase 1C of MSW Unit, in accordance with the application and plans provided in permit application Log No. 2010-466 and approved by Modification No. 16;
 - d. The approximately 4.5 acres of Phase 1A of CWU, in accordance with application and plans provided in permit application Log Nos. 2011-024 and 2014-359 and approved by Modification Nos. 18 and 47, respectively;
 - e. The approximately 5.94 acres of Phase 3A of MSW Unit, in accordance with the application and plans provided in permit application Log No. 2011-072 and approved by Modification No. 21;
 - f. The approximately 4.57 acres of Phase 3B (3.8 acres) and Phase 3A2 (0.77 acres) of MSW Unit, in accordance with the application and plans provided in permit application Log No. 2011-550 and approved by Modification No. 27;
 - g. The approximately 1.64 acres of Phase 1A of CWU, in accordance with application and plans provided in permit application Log Nos. 2011-024, 2012-047 and 2014-359 and approved by Modification Nos. 18, 28 and 47, respectively;
 - h. The approximately 4.56 acres of Phase 5A1 of MSW Unit, in accordance with the application and plans provided in permit application Log No. 2013-009 and approved by Modification No. 39; and
 - i. The approximately 3.75 acres of Phases 5A2 (1.19 acres) and 5A3 (2.56 acres) of MSW Unit, in accordance with the application and plans provided in permit application Log Nos. 2013-009 and 2013-384 and approved by Modification No. 39 and 40.
28. A separation layer shall be placed on the northern and eastern slopes of the CWU to physically separate wastes placed in the MSW Unit from wastes placed in the CWU. The separation layer shall consist of the following from top to bottom:

Page 22

- 40 mil textured HDPE geomembrane
 - 12 inches of compacted soil (minimum)
29. Wastes received at the Customer Convenience Facility (CCF) shall be collected in a container placed on a concrete pad and disposed at the active face of the landfill by the end of each operating day. The location of the CCF is shown on the drawing titled Customer Convenience Facility Site Plan (Drawing number P-CCF-1) provided in application Log No. 2011-424. No special wastes shall be received at the CCF. Wastes shall be received at the CCF only during the landfill operating hours specified in Condition No. II.11 of this permit (Modification No. 26).
30. Modification No. 25 and 32, respectively, approved installation of a temporary storm water diversion geomembrane along the sidewall liner system and floor of the developed portions of the landfill. The temporary storm water diversion geomembranes shall be installed in developed portions of the landfill that are yet to receive waste. The developed portions of the landfill are listed in Condition No. II.27 of this permit. All liquids that have been or is in contact with waste is leachate, as defined in 35 Ill. Adm. Code 810.103 and shall continue to be managed as such.

III. SPECIAL WASTE

A. DISPOSAL OF SPECIAL WASTE

1. The permittee is authorized to accept non-hazardous special waste that meets the definition of industrial process waste or pollution control waste as found in Sections 3.235 and 3.335, respectively, of the Illinois Environmental Protection Act, in accordance with the following requirements:
 - a. The waste is analyzed in accordance with the requirements described below and complies with the acceptance criteria in the approved waste analysis plan;
 - b. The waste is delivered by an Illinois licensed special waste hauler or an exempt hauler as defined in 35 Ill. Adm. Code, Section 809.211; and
 - c. The waste is accompanied by a manifest, if required.
2. The permittee shall obtain a completed Special Waste Preacceptance Form (enclosed along with Permit No. 2005-070-LF) and a preacceptance analysis from each generator for each waste to be accepted. In addition, the Annual Generator Special Waste and Recertification for Disposal of Special Waste form (enclosed

along with Permit No. 2005-070-LF), which certifies the waste has not changed since the last analysis, must be completed and included in the operating record. A complete laboratory analysis must be provided with the exceptions listed below.

Analysis shall be conducted using SW-846 test methods. The waste shall be reanalyzed at least every five years and must identify the actual concentration of each chemical constituent and state of each physical parameter. In all cases, a copy of the lab analysis (on lab letterhead and signed by a responsible party such as the person conducting the analysis or his/her supervisor) must be included in the operating record with the Special Waste Preacceptance Form (Profile Identification Sheet). The analysis may not be greater than one year old at the time. A new analysis is required if the composition of the waste changes (normal variations in waste composition are expected and are not included in this requirement). All waste must be analyzed as follows:

- a. The permittee shall obtain the following lab analyses to determine the concentrations of the following parameters.

- Paint Filter Test
- Flash point
- Sulfide (reactive)
- Cyanide (reactive)
- Phenol (total)
- pH
- Toxicity Characteristic Constituents

- b. The permittee shall obtain analysis for reactive sulfides (H_2S) and cyanides (HCN). Waste containing 250 ppm or greater reactive cyanide or 500 ppm or greater reactive sulfide is presumed to be hazardous waste pursuant to 35 Ill. Adm. Code, Section 721.123(a)(5) unless specific information to show it does not present a danger to human health or the environment is provided. Analysis for total sulfide and/or cyanide may be substituted for reactive concentrations if they are equal to or less than 10 ppm. For wastes containing greater than 10 ppm reactive cyanide or reactive sulfide, the permittee shall not accept the waste unless the generator provides a signed and dated statement indicating the following:

- i. The waste has never caused injury to a worker because of H_2S and/or HCN generation;
- ii. That the OSHA work place air concentration limits for H_2S and/or HCN have not been exceeded in areas where the waste is generated, stored or otherwise handled; and

- iii. That air concentrations of H₂S and/or HCN above 10 ppm have not been encountered in areas where the waste is generated, stored or otherwise handled.
- c. The permittee shall obtain analysis for phenols. If the total phenol concentration is greater than 1000 ppm, the waste will be required to be drummed and labeled, unless justification that this precaution is not necessary is provided. The justification must demonstrate skin contact is unlikely during transport or disposal.
- d. The permittee shall obtain metals and organics analysis. Either procedure may be utilized (i.e., total or TCLP), but any constituent whose total concentration exceeds the TCLP limit specified in 35 Ill. Adm. Code, Section 721.124 must be analyzed using the TCLP test and the results reported, unless an alternative test has been approved by the Illinois EPA. TCLP test methods must be in accordance with SW 846-1311.
- e. EXCEPTIONS:
 - i. The generator may certify that the eight pesticides (D012, D013, D014, D015, D016, D017, D020 and D031) would not reasonably be expected to be present in the waste based on the nature of the process generating the waste.
 - ii. Petroleum contaminated media and debris from LUST sites subject to corrective action regulation under 35 Ill. Adm. Code, Parts 731 and 732 are temporarily exempt from complete TCLP analysis and the generator may limit analyses to flashpoint, paint filter test and TCLP lead.
 - iii. For off-specification, unused or discarded commercial or chemical products, an MSDS to determine the hazardous constituents present may be provided in lieu of analytical results.
- f. CLARIFICATIONS:

Notwithstanding the exception for manufactured gas plant waste contained in 35 Ill. Adm. Code 721.124(a), no manufactured gas plant waste shall be disposed in Clinton Landfill 3's MSW unit or the CWU, unless: i) the waste has been tested in accordance with subsection (d) of this special condition, and ii) the analysis has demonstrated that the waste does not

exceed the regulatory levels for any contaminant given in the table contained in 35 Ill. Adm. Code 721.124(b).

- g. Pursuant to 35 Ill. Adm. Code 722.111, the generator of a solid waste is required to determine if the waste is hazardous and comply with all applicable hazardous waste regulations. For any waste that has been determined to be hazardous, the results of quality assurance testing for the treatment program, taken at an appropriate frequency to demonstrate the waste is no longer hazardous, must be obtained. Verification that the waste meets the land disposal restrictions must also be documented. These requirements are in addition to the other standard special waste test requirements.
3. An individual waste stream permit is no longer required by the Illinois EPA for this facility. Therefore, a waste stream permit number will no longer be required on the manifest when shipping waste to this facility as authorized by this permit.
4. Special waste generated due to an emergency situation may be disposed without complete TCLP analysis if:
 - a. The permittee receives authorization from the Emergency Response Unit of the Illinois EPA at 1-217-782-3637;
 - b. The permittee ensures that the generator has received an incident number from the Illinois Emergency Management Agency at 1-800-782-7860 within Illinois, or 1-217-782-7860 outside of Illinois; and
 - c. The waste is analyzed for the chemical constituents required by the Emergency Response Unit.
5. The permittee shall conduct the following analyses for waste received in labeled containers in lab packs, including commingled wastes:
 - a. Compatibility review in accordance with the procedures identified in USEPA document EPA-600/2-80-076; and
 - b. MSDS review to determine the hazardous constituents present and appropriate USEPA hazardous waste class.
6. RCRA empty containers received as a special waste are subject to the following conditions:
 - a. Containers have a rated capacity of less than 110 gallons only.

- b. Containers which formerly held 'P' listed hazardous waste must be triple rinsed in accordance with 35 Ill. Adm. Code 721.107(b)(3)(A).
 - c. TSCA regulated quantities of PCBs or empty compressed gas cylinders are not included under this permit. Containers which formerly held TSCA regulated quantities of PCBs are subject to the TSCA requirements administered by the USEPA.
 - c. All containers must meet the definition of empty as described in 35 Ill. Adm. Code, Section 721.107(b).
 - d. Additionally, where possible, a copy of the material safety data sheets for products last present in the container shall be obtained and kept on file.
 - e. For drums, at least one end must be removed and the drums must be crushed flat.
- 7. The Special Waste Preacceptance Form shall be utilized for the special waste profile identification requirements of 35 Ill. Adm. Code, Section 811.404(a).
 - 8. The Annual Generator Special Waste Recertification for Disposal Special Waste form (enclosed along with Permit No. 2005-070-LF) shall be utilized for the special waste recertification requirements of 35 Ill. Adm. Code, Section 811.404(b).
 - 9. The operator shall retain all special waste records until the end of the post-closure period in accordance with 35 Ill. Adm. Code, Section 811.405.

B. SOLIDIFICATION OF SPECIAL WASTE

- 1. Waste solidification shall take place in liquid tight and structurally sound inspectable containers like steel drums and roll-off containers placed over an area that has both a certified liner and an operating leachate collection system that meet the standards of 35 Ill. Adm. Code 811.306, 811.307 and 811.308. The solidification area shall be at least 10-feet above the landfill floor, and at least 30-feet from the landfill sidewall liner. Berms shall be constructed around the solidification area to prevent run-off from the area.
- 2. Solidification of liquid wastes destined for disposal in CWU shall occur within the limits of CWU.

3. Solidification containers shall be adequately spaced to allow inspections and equipment access. No more than 10 drums and 10 roll-off containers shall be used at any one time.
4. All special waste generators which send liquid waste to this facility for solidification and disposal must have an Illinois EPA generator number.
5. Only non-hazardous wastes as defined in 35 Ill. Adm. Code 722.111 may be received for solidification at this facility.
6. This permit approves the use of the following reagents and absorbents in the solidification process:
 - a. Reagents
 - i. Lime
 - ii. Pozzalime
 - iii. Fly ash from coal combustion
 - iv. Bottom ash from coal combustion
 - v. Cements (only used for TSCA regulated PCB liquids to be disposed in CWU)
 - vi. Bentonite (only used for TSCA regulated PCB liquids to be disposed in CWU)
 - b. Absorbents
 - i. Soil
 - ii. Oil Dry
 - iii. Sawdust
 - iv. Corn cobs

All reagents and absorbents used must not exhibit any characteristic which would classify it as a hazardous waste. Use of other materials or wastes other than those listed above shall be subject to approval by the Illinois EPA permit process.

7. Lime, Pozzalime, Fly ash from coal combustion, Bottom ash from coal combustion, Cements, Bentonite, Soil, Oil Dry, Saw Dust and Corn cobs has been approved for use as waste solidification agents. Purchased Lime, Pozzalime, Cements, Bentonite, sawdust and Corn Cobs; uncontaminated soil; and unused oil dry are not considered waste. Any other solidification agents are considered waste and shall be managed as such, unless approval for their use as solidification agents has been obtained through one of the beneficial use determination (BUD) processes described in Sections 3.135 and 22.54 of the Act.
8. Absorbents and reagents will be stockpiled on site in accordance with the facility's Storm Water Pollution Prevention Plan. Absorbent stockpiles shall not contain more than 500 cubic yards of absorbent materials. Reagent stockpiles shall be covered to protect the reagents from precipitation and wind. Reagent stockpiles shall not contain more than 120 cubic yards of reagents. Storage of reagents and absorbents shall not contribute to a violation of Section 21(a), Section 12, or Section 9 of the Act.
9. The solidification unit must be operated so as to minimize spilling reagents/absorbents and waste. Any spilled reagents/absorbents and waste shall be removed on a daily basis.
10. The following conditions are applicable to any waste containing a liquid phase(s) (fails paint filter):
 - a. Each phase must be analyzed for total organic halogen (TOX) using the test method specified in 35 Ill. Adm. Code, Part 729. Any waste containing 10,000 ppm or greater of TOX must be analyzed to determine the specific constituents, and their concentrations, that make up TOX. These constituents and their concentration should be reported on the lab analysis report. Any liquid containing multiple phases must include individual analyses for each phase;
 - b. Wastes destined for disposal in CWU shall be analyzed for total PCBs;
 - c. The preacceptance documentation must include a description of the solidification method used at the generating site (or off-site permitted treatment facility) with test results demonstrating that the solidified waste passes the paint filter test; and
 - d. If a waste is used to solidify the liquid (i.e., two or more wastes are mixed) all required testing must be performed on the solidified waste. Otherwise, all testing (except paint filter) may be performed on the waste before solidification and a statement from the generator may be accepted

certifying that the additives used have been evaluated and there is no reason to believe they would cause the waste to become hazardous.

11. The permittee shall not perform solidification if the bench-scale reactivity test(s) determines incompatibility of the waste and reagent.
12. The following information shall be documented in the facility's operating record for each load of waste received for solidification:
 - a. Date the load was received;
 - b. Manifest number associated with the waste load;
 - c. Waste name;
 - d. Volume of waste received;
 - e. Generator name, location and Illinois EPA generator number or hauler number, if not a special waste;
 - f. Results of all analyses conducted on the waste load;
 - g. Type of reagent and/or absorbent used to solidify the waste; and
 - h. Documentation that the solidified waste does not exhibit hazardous characteristics as defined in 35 Ill. Adm. Code 721 Subpart C, e.g., result of the compatibility test done in accordance with the facility's waste analysis plan.
13. Each load of the solidified waste shall be sampled and tested by the paint filter test described in 35 Ill. Adm. Code 729.320 prior to disposal. Waste that yields fluid may not be disposed.
14. A complete TCLP analysis shall be performed on solidified waste resulting from a liquid waste with a pH <5 to demonstrate that no hazardous waste has been produced.
15. By the end of each day of the operation, all waste received for treatment shall be solidified. Solidified wastes shall be removed from the solidification unit and disposed of at the active disposal face of the landfill no later than the end of next business day.

Page 30

16. All wash water generated from the solidification unit shall be managed in the same manner as leachate.
17. The solidification unit may be operated from 6:00 a.m. to 6:00 p.m. Monday through Friday and 6:00 a.m. to 3:00 p.m. on Saturday.
18. In the event of a spill, such materials and equipment necessary must be available on site in order to prevent leachate migration from the contaminated area.

IV. RECORDKEEPING

1. Information developed by the operator but not yet forwarded to the Illinois EPA in a quarterly or annual report shall be kept at or near the facility for inspection by the Illinois EPA upon request during normal working hours.
2. Information and observations derived from load checking inspections shall be recorded in writing and retained at the facility for at least three years.
3. Every person who delivers special waste to a special waste hauler, every person who accepts special waste from a special waste hauler and every special waste hauler shall retain a copy of the special waste transportation record as a record of each special waste transaction. These copies shall be retained for three years and shall be made available at reasonable times for inspection and photocopying by the Illinois EPA pursuant to Section 4(d) of the Act.
4. The operator shall retain copies of any special waste profile identification sheets, special waste recertifications, certifications of representative samples, special waste laboratory analyses, special waste analysis plans, and any waivers of requirements, at the facility until the end of the closure period and thereafter at the site office until the end of the post-closure care period.
5. Inspections of the closed landfill shall be conducted in accordance with the approved post-closure care plan. Records of field investigations, inspections, sampling and corrective action taken are to be maintained at the site and made available to Illinois EPA personnel. During the post-closure care period, those records are to be maintained at the office of the site operator.
6. The owner or operator shall record and retain near the facility in an operating record or in some alternative location specified by the Illinois EPA, the information submitted to the Illinois EPA pursuant to 35 Ill. Adm. Code, Parts 812 and 813, as it becomes available. At a minimum, the operating record shall contain the following information, even if such information is not required by 35 Ill. Adm. Code, Part 812 or 813:

- a. Any location restriction demonstration required by 35 Ill. Adm. Code, Sections 811.302, 812.109, and 812.303;
- b. Inspection records, training procedures, and notification procedures required by 35 Ill. Adm. Code, Section 811.323;
- c. Gas monitoring results and any remediation plans required by 35 Ill. Adm. Code, Sections 811.310 and 811.311;
- d. Any MSWLF unit design documentation for placement of leachate or gas condensate in a MSWLF unit required by 35 Ill. Adm. Code, Section 811.107(m);
- e. Any demonstration, certification, monitoring results, testing, or analytical data relating to the groundwater monitoring program required by 35 Ill. Adm. Code, Sections 811.319, 811.324, 811.325, 811.326, 812.317, 813.501 and 813.502;
- f. Closure and post-closure care plans and any monitoring, testing, or analytical data required by 35 Ill. Adm. Code, Sections 811.110, 811.111, 812.114(h), 812.115 and 812.313; and
- g. Any cost estimates and financial assurance documentation required by 35 Ill. Adm. Code Part 811, Subpart G.

V. GENERAL CONDITIONS

1. This permit is issued with the expressed understanding that no process discharge to Waters of the State or to a sanitary sewer will occur from these facilities except as authorized by a permit issued by the Bureau of Water. Additionally, all stormwater discharges from the facility shall be authorized by appropriate permit issued by Bureau of Water.
2. This permit does not relieve the permittee of the responsibility of complying with the provisions of the State of Illinois Rules and Regulations, 35 Ill. Adm. Code Subtitle B, Air Pollution Control, Chapter 1. The permittee may be required to file reports and/or obtain applicable permits through the Illinois EPA's Bureau of Air (BOA) – Division of Air Pollution Control.

Based upon the information submitted in this application and consultations with BOA – Permit Section, this project requires an Air Pollution Control Construction Permit, pursuant to 35 Ill. Adm. Code 201.142, prior to the construction of the

Municipal Solid Waste Landfill. Further, this project may be subject to the New Source Performance Standards (NSPS) for new Municipal Solid Waste Landfills (61 Fed. Reg. 9905 et seq.) that USEPA promulgated on March 12, 1996, i.e., 40 CFR Part 60, Subpart WWW – Standards of Performance for Municipal Solid Waste Landfills. The Illinois EPA's BOA is implementing NSPS, for landfills classified as new Municipal Solid Waste Landfill, pursuant to a delegation agreement between Illinois EPA and USEPA.

Please contact the Illinois EPA's BOA – Division of Air Pollution Control – Permit Section at 217/782-2113, if you have any questions regarding these requirements.

3. If changes occur which modify any of the information the permittee has used in obtaining a permit for this facility, the permittee shall notify the Illinois EPA. Such changes would include but not be limited to any changes in the names or addresses of both beneficial and legal titleholders to the herein-permitted site. The notification shall be submitted to the Illinois EPA within fifteen days of the change and shall include the name or names of any parties in interest and the address of their place of abode; or, if a corporation, the name and address of its registered agent.
4. Pursuant to 35 Ill. Adm. Code, Section 813.201(a), any modifications to this permit shall be proposed in the form of a permit application and submitted to the Illinois EPA.
5. Pursuant to 35 Ill. Adm. Code, Section 813.301, an application for permit renewal shall be filed with the Illinois EPA at least ninety days prior to the expiration date of this permit.
6. Current, valid Prior Conduct Certification pursuant to 35 Ill. Adm. Code Part 745 is required for all operators of landfills that require a permit.
7. Landfill Operator Certification pursuant to 68 Ill. Adm. Code Part 870 is required for operation of a landfill.
8. The permittee(s) shall submit a 39(i) certification and supporting documentation within 30 days of any of the following events:
 - a. The owner or officer of the owner, or operator, or any employee who has control over operating decisions regarding the facility has violated federal, State, or local laws, regulations, standards, or ordinances in the operation of waste management facilities or sites; or

- b. The owner or operator or officer of the owner, or operator, or any employee who has control over operating decisions regarding the facility has been convicted in this or another State of any crime which is a felony under the laws of this State, or conviction of a felony in a federal court; or
- c. The owner or operator or officer of the owner, or operator, or any employee who has control over operating decisions regarding this facility has committed an act of gross carelessness or incompetence in handling, storing, processing, transporting, or disposing of waste; or
- d. A new person is associated with the owner or operator who can sign the application form(s) or who has control over operating decisions regarding the facility, such as corporate officer or a delegated employee.

VI. SURFACE WATER CONTROL

- 1. Runoff from disturbed areas to Waters of the State shall be permitted by the Illinois EPA in accordance with 35 Ill. Adm. Code, Part 309, and meet the requirements of 35 Ill. Adm. Code, Part 304 unless permitted otherwise.
- 2. All surface water control structures other than temporary diversions for intermediate phases shall be operated until the final cover is placed and erosional stability is provided by the final protective layer of the final cover system.
- 3. Runoff from undisturbed areas resulting from precipitation events less than or equal to the 25-year, 24-hour precipitation event shall be diverted around disturbed areas where possible and not commingled with runoff from disturbed areas.
- 4. Site surface drainage, during development, during operation and after the site is closed, shall be managed in accordance with the approved drainage control plan detailed in Permit Application Log Nos. 2005-070, 2008-054 and 2012-216. Stormwater management structures shall be constructed prior to disturbing any portion of a drainage area in accordance with the sequence shown on the phasing plans, Drawing Nos. P-PP2 through P-PP12 provided in Application Log No. 2012-216; and table of Estimated Construction dates also provided in Application Log No. 2012-216. (Modification Nos. 9 and 34).

VII. LEACHATE MANAGEMENT/MONITORING

- 1. Pursuant to 35 Ill. Adm. Code, Section 811.309(h)(3), leachate from this MSWLF landfill shall be collected and disposed beginning as soon as it is first produced and continuing for at least 30 years after closure except as otherwise provided by 35 Ill. Adm. Code, Sections 811.309(h)(4) and (h)(5). Collection and disposal of

leachate may cease only when the conditions described in 35 Ill. Adm. Code, Section 811.309(h)(2) have been achieved. Leachate removed from this landfill shall be treated at an Illinois EPA permitted facility in accordance with the leachate management plan proposed in Permit Application Log Nos. 2005-070 and 2008-054.

2. Pursuant to 35 Ill. Adm. Code, Sections 811.307(a) and (b), 811.308(a) and (h), and 811.309(a), leachate shall be pumped from the side slope riser sump(s) before the level of leachate rises above the invert of the collection pipe(s) at its lowest point(s). Leachate removal as such shall be performed throughout the period that the leachate collection/management system must be operated in accordance with Permit Application Log Nos. 2005-070 and 2008-054.
3. The following monitoring points (leachate collection sumps) are to be used in the Leachate Monitoring Program for this facility:

Leachate Monitoring Points

<u>Applicant Designation</u>	<u>Illinois EPA Designation</u>
L301	L301
L311P	L31P
L311R	L31R
@L302	@L302
L303	L303
@L304	@L304
L305	L305
@L306	@L306
@L307	@L307
@L308	@L308
@L309P	@L30P
@L309R	@L30R
@L310	@L310
@L312	@L312
@L313	@L313

@ indicates leachate monitoring points not yet placed into service
 P designates primary or upper leachate collection system for CWU
 R designates redundant or lower leachate collection system for CWU

4. Pursuant to 35 Ill. Adm. Code, Sections 811.309(g), 722.111 and 721, Subpart C, leachate monitoring (i.e., sampling, measurements and analysis) must be conducted in accordance with the permit for this facility. The concentrations or values for the parameters contained in List L1 (below) shall be determined on a semi-annual basis and the results must be submitted with the groundwater reports.

Each year, the permittee shall collect representative leachate samples from MSW Unit (MREP) and CWU (CREP). Both these samples must be tested for the parameters contained in List L2.

Leachate from the CWU shall be analyzed for List L3 parameters on a monthly basis.

Condition VII.5 presents the sampling, testing and reporting schedules in tabular form. Leachate monitoring at each monitoring point shall continue as long as groundwater monitoring at this landfill is necessary pursuant to 35 Ill. Adm. Code, Section 811.319(a)(1)(C).

LIST L1

<u>Leachate Monitoring Parameters</u>	<u>STORET</u>
pH (S.U.)	00400
Elevation Leachate Surface (ft. MSL)	71993
Bottom of Well Elevation (ft. MSL)	72020
Leachate Level from Measuring Point (ft.)	72109
Arsenic (total)	01002
Barium (total)	01007
Cadmium (total)	01027
Iron (total)	01045
Ammonia Nitrogen – N (mg/L)	00610
Bacteria (Fecal Coliform) (FCBR/100 mL)	31616
Biochemical Oxygen Demand (BOD5) (mg/L)	00310
1,1,1,2-Tetrachloroethane	77562
1,1,1-Trichloroethane	34506
1,1,2,2-Tetrachloroethane	34516
1,1,2-Trichloroethane	34511
1,1-Dichloroethane	34496
1,1-Dichloroethylene	34501
1,1-Dichloropropene	77168
1,2,3-Trichlorobenzene	77613
1,2,3-Trichloropropane	77443
1,2,4-Trichlorobenzene	34551
1,2,4-Trimethylbenzene	77222
1,2-Dibromo-3-Chloropropane	38760
1,2-Dichloroethane	34531

LIST L1

<u>Leachate Monitoring Parameters</u>	<u>STORET</u>
1,2-Dichloropropane	34541
1,3,5-Trimethylbenzene	77226
1,3-Dichloropropane	77173
1,3-Dichloropropene	34561
1,4-Dichloro-2-Butene	73547
1-Propanol	77018
2,2-Dichloropropane	77170
2,4,5-tp (Silvex)	39760
2,4,6-Trichlorophenol	34621
2,4-Dichlorophenol	34601
2,4-Dichlorophenoxyacetic Acid (2,4-D)	39730
2,4-Dimethylphenol	34606
2,4-Dinitrotoluene	34611
2,4-Dinitrophenol	34616
2,6-Dinitrotoluene	34626
2-Chloroethyl Vinyl Ether	34576
2-Chloronaphthalene	34581
2-Chlorophenol	34586
2-Hexanone	77103
2-Propanol (Isopropyl Alcohol)	81310
3,3-Dichlorobenzidine	34631
4,4-DDD	39310
4,4-DDE	39320
4,6-Dinitro-O-Cresol	34657
4-Bromophenyl Phenyl Ether	34636
4-Chlorophenyl Phenyl Ether	34641
4-Methyl-2-Pentanone	78133
4-Nitrophenol	34646
Acenaphthene	34205
Acenaphthylene	34200
Acetone	81552
Alachlor	77825
Aldicarb	39053
Aldrin	39330
Alpha – BHC	39337

LIST L1

<u>Leachate Monitoring Parameters</u>	<u>STORET</u>
Aluminum	01105
Anthracene	34220
Antimony	01097
Atrazine	39033
Benzene	34030
Benzo (a) Anthracene	34526
Benzo (a) Pyrene	34247
Benzo (b) Fluoranthene	34230
Benzo (ghi) Perylene	34521
Benzo (k) Fluoranthene	34242
Beryllium (total)	01012
Beta – BHC	39338
Bicarbonate (mg/L as CaCO ₃)	00425
Bis (2-Chloro-1-Methylethyl) Ether	73522
Bis (2-Chloroethoxy) Methane	34278
Bis (2-Chloroethyl) Ether	34273
Bis (2-Ethylhexyl) Phthalate	39100
Bis(Chloromethyl) Ether	34268
Boron	01022
Bromobenzene	81555
Bromochloromethane	77297
Bromodichloromethane	32101
Bromoform	32104
Bromomethane	34413
Butanol	45265
Butyl Benzyl Phthalate	34292
Calcium (mg/L)	00916
Carbofuran	81405
Carbon Disulfide	77041
Carbon Tetrachloride	32102
Chemical Oxygen Demand (COD) (mg/L)	00335
Chlordane	39350
Chloride (mg/L)	00940
Chlorobenzene	34301

LIST L1

<u>Leachate Monitoring Parameters</u>	<u>STORET</u>
Chloroethane	34311
Chloroform	32106
Chloromethane	34418
Chromium (total)	01034
Chrysene	34320
Cis-1,2-Dichloroethylene	77093
Cobalt (total)	01037
Copper (total)	01042
Cyanide (mg/L)	00720
DDT	39370
Delta – BHC	46323
Di-N-Butyl Phthalate	39110
Di-N-Octyl Phthalate	34596
Dibenzo (a,h) Anthracene	34556
Dibromochloromethane	32105
Dibromomethane	77596
Dichlorodifluoromethane	34668
Dichloromethane	34423
Dieldrin	39380
Diethyl Phthalate	34336
Dimethyl Phthalate	34341
Endosulfan I	34361
Endosulfan II	34356
Endosulfan Sulfate	34351
Endrin	39390
Endrin Aldehyde	34366
Ethyl Acetate	81585
Ethylbenzene	78113
Ethylene Dibromide (EDB)	77651
Fluoranthene	34376
Flourene	34381
Fluoride (mg/L)	00951
Heptachlor Epoxide	39420
Heptachlor	39410
Hexachlorobenzene	39700

LIST L1

<u>Leachate Monitoring Parameters</u>	<u>STORET</u>
Hexachlorobutadiene	39702
Hexachlorocyclopentadiene	34386
Hexachloroethane	34396
Ideno (1,2,3-cd) Pyrene	34403
Iodomethane	77424
Isopropylbenzene	77223
Lead (total)	01051
Lindane	39782
Magnesium (total) (mg/L)	00927
Manganese (total)	01055
Mercury (total)	71900
Methoxychlor	39480
Methyl Ethyl Ketone	81595
Naphthalene	34696
Nickel (total)	01067
Nitrate-Nitrogen (mg/L)	00620
Nitrobenzene	34447
Oil. Hexane Soluble (or Equivalent) (mg/L)	00550 or 00552
Parathion	39540
Pentachlorophenol	39032
Phenanthrene	34461
Phenols	32730
Phosphorous (mg/L)	00665
Polychlorinated Biphenyls	39516
Potassium (mg/L)	00937
Pyrene	34469
Selenium	01147
Silver (total)	01077
Specific Conductance (umhos/cm)	00094
Sodium (mg/L)	00929
Styrene	77128
Sulfate (mg/L)	00945
Temperature of Leachate Sample (°F)	00011
Tert-Butylbenzene	77353

LIST L1

<u>Leachate Monitoring Parameters</u>	<u>STORET</u>
Tetrachlorodibenzo-p-Dioxins	34675
Tetrachloroethylene	34475
Tetrahydrofuran	81607
Thallium	01059
Tin	01102
Toluene	34010
Total Organic Carbon (TOC) (mg/L)	00680
Total Dissolved Solids (TDS) (mg/L)	70300
Total Suspended Solids (TSS) (mg/L)	00530
Toxaphene	39400
Trans-1,2-Dichloroethylene	34546
Trans-1,3-Dichloropropene	34699
Trichloroethylene	39180
Trichlorofluoromethane	34488
Vinyl Acetate	77057
Vinyl Chloride	39175
Xylene	81551
Zinc (total)	01092
m-Dichlorobenzene	34566
m+p-Xylene	61283
n-Butylbenzene	77342
n-Nitrosodimethylamine	34438
n-Nitrosodiphenylamine	34433
n-Nitrosodipropylamine	34428
n-Propylbenzene	77224
o-Chlorotoluene	77275
o-Dichlorobenzene	34536
o-Nitrophenol	34591
o-Xylene	77135
p-Chlorotoluene	77277
p-Cresol	77146
p-Dichlorobenzene	34571
p-Isopropyltoluene	77356
sec-Butylbenzene	77350

LIST L2

RCRA Parameters for Leachate and Condensate

<u>RCRA PARAMETERS</u>	<u>STORETS</u>	
	<u>Ignitability</u>	
Flashpoint, Pensky-Martens Closed Cup (°F)	00497	
	<u>Corrosivity</u>	
pH (S.U.)	00400	
	<u>Reactivity</u>	
Reactive Cyanide	99040	
Reactive Sulfide	99042	
	<u>Toxicity</u>	
	<u>Total</u>	<u>TCLP</u>
	<u>conc.</u>	<u>conc.</u>
	<u>(ug/l)</u>	<u>(mg/L)</u>
Arsenic	01002	99012
Barium	01007	99014
Cadmium	01027	99016
Chromium	01034	99018
Lead	01051	99020
Mercury	71900	99022
Selenium	01147	99024
Silver	01077	99026
Endrin	39390	99028
Lindane	39782	99030
Methoxychlor	39480	99032
Toxaphene	39400	99034
2,4-D	39730	99036
2,4,5-TP Silvex	39760	99038
Benzene	34030	99128
Carbon tetrachloride	32102	99050
Chlordane	39350	99148

Page 42

LIST L2

RCRA Parameters for Leachate and Condensate

<u>RCRA PARAMETERS</u>		<u>STORETS</u>
Chlorobenzene	34301	99096
Chloroform	32106	99149
o-Cresol	77152	99150
m-Cresol	77151	99151
p-Cresol	77146	99152
Cresol	79778	99153
1,4-Dichlorobenzene	34571	99154
1,2-Dichloroethane	34531	99155
1,1-Dichloroethylene	34501	99156
2,4-Dinitrotoluene	34611	99157
Heptachlor (and its epoxide)	39410 and 39420	99158
Hexachlorobenzene	39700	99159
Hexachloro-1,3-Butadiene	39702	99160
Hexachloroethane	34396	99161
Methyl Ethyl Ketone	81595	99060
Nitrobenzene	34447	99062
Pentachlorophenol	39032	99064
Pyridine	77045	99066
Tetrachloroethylene	34475	99068
Trichloroethylene	39180	99076
2,4,5-Trichlorophenol	77687	99078
2,4,6-Trichlorophenol	34621	99080
Vinyl Chloride	39175	99162

LIST L3

<u>Leachate Monitoring Parameters for CWU</u>	<u>STORET</u>
Aroclor 1016	34671
Aroclor 1221	39488
Aroclor 1232	39492
Aroclor 1242	39496

EXHIBIT A

LIST L3

<u>Leachate Monitoring Parameters for CWU</u>	<u>STORET</u>
Aroclor 1248	39500
Aroclor 1254	39504
Aroclor 1260	39508
Aroclor 1262	81649
Aroclor 1268	81650
Aroclor (Total PCBs)	39516

Notes for all leachate monitoring parameters:

- a. Flashpoint shall be reported in degrees Fahrenheit. The parameters for reactivity and toxicity shall be reported in parts per million.
 - b. The permittee shall obtain metals and organics analysis. Either procedure may be utilized (i.e., total or TCLP), but any constituent whose total concentration exceeds the TCLP limit specified in 35 Ill. Adm. Code, Section 721.124 must be analyzed using the TCLP test and the results reported, unless an alternative test has been approved by the Illinois EPA. TCLP test methods must be in accordance with SW 846-1311.
 - c. The test methods for leachate monitoring shall be those approved in the USEPA's Test Methods for Evaluating Solid Waste, Physical/Chemical Methods (SW-846), Third Edition or the equivalent thereof.
 - d. All parameters shall be determined from unfiltered samples.
 - e. The monitoring results should be reported in ug/l units unless otherwise indicated.
5. The schedule for leachate sample collection and submission of monitoring data is illustrated below:

Sampling Period	Sampling Points	Lists	Report Due Date
January 2013	L31P	L3	July 15, 2013
February 2013	L31P	L3	July 15, 2013
March 2013	L31P	L3	July 15, 2013
April – May 2013	L301	L1	July 15, 2013
April – May 2013	MREP	L2	July 15, 2013

Sampling Period	Sampling Points	Lists	Report Due Date
April 2013	L31P	L3	July 15, 2013
May 2013	L31P	L3	July 15, 2013
June 2013	L31P	L3	July 15, 2013
July 2013	L31P	L3	January 15, 2014
August 2013	L31P	L3	January 15, 2014
September 2013	L31P	L3	January 15, 2014
Oct-Nov 2013	L31P and L31R	L1	January 15, 2014
Oct-Nov 2013	L305	L1	January 15, 2014
Oct-Nov 2013	CREP	L2	January 15, 2014
October 2013	L31P	L3	January 15, 2014
November 2013	L31P	L3	January 15, 2014
December 2013	L31P	L3	January 15, 2014
January 2014	L31P	L3	July 15, 2014
February 2014	L31P	L3	July 15, 2014
March 2014	L31P	L3	July 15, 2014
April – May 2014	L303	L1	July 15, 2014
April – May 2014	MREP	L2	July 15, 2014
April 2014	L31P	L3	July 15, 2014
May 2014	L31P	L3	July 15, 2014
June 2014	L31P	L3	July 15, 2014
July 2014	L31P	L3	January 15, 2015
August 2014	L31P	L3	January 15, 2015
September 2014	L31P	L3	January 15, 2015
Oct-Nov 2014	L31P and L31R	L1	January 15, 2015
Oct-Nov 2014	L301	L1	January 15, 2015
Oct-Nov 2014	CREP	L2	January 15, 2015
October 2014	L31P	L3	January 15, 2015
November 2014	L31P	L3	January 15, 2015
December 2014	L31P	L3	January 15, 2015
January 2015	L31P	L3	July 15, 2015
February 2015	L31P	L3	July 15, 2015
March 2015	L31P	L3	July 15, 2015
April – May 2015	L305	L1	July 15, 2015
April – May 2015	MREP	L2	July 15, 2015
April 2015	L31P	L3	July 15, 2015
May 2015	L31P	L3	July 15, 2015
June 2015	L31P	L3	July 15, 2015
July 2015	L31P	L3	January 15, 2016
August 2015	L31P	L3	January 15, 2016
September 2015	L31P	L3	January 15, 2016
Oct-Nov 2015	L31P and L31R	L1	January 15, 2016
Oct-Nov 2015	L303	L1	January 15, 2016

Sampling Period	Sampling Points	Lists	Report Due Date
Oct-Nov 2015	CREP	L2	January 15, 2016
October 2015	L31P	L3	January 15, 2016
November 2015	L31P	L3	January 15, 2016
December 2015	L31P	L3	January 15, 2016
January 2016	L31P	L3	July 15, 2016
February 2016	L31P	L3	July 15, 2016
March 2016	L31P	L3	July 15, 2016
April – May 2016	L301	L1	July 15, 2016
April – May 2016	MREP	L2	July 15, 2016
April 2016	L31P	L3	July 15, 2016
May 2016	L31P	L3	July 15, 2016
June 2016	L31P	L3	July 15, 2016
July 2016	L31P	L3	January 15, 2017
August 2016	L31P	L3	January 15, 2017
September 2016	L31P	L3	January 15, 2017
Oct-Nov 2016	L31P and L31R	L1	January 15, 2017
Oct-Nov 2016	L305	L1	January 15, 2017
Oct-Nov 2016	CREP	L2	January 15, 2017
October 2016	L31P	L3	January 15, 2017
November 2016	L31P	L3	January 15, 2017
December 2016	L31P	L3	January 15, 2017

L1 – Leachate Monitoring Parameters
 L2 – Annual RCRA Leachate Parameters
 LREP –Representative Leachate Sample
 L3 – Leachate Monitoring Parameters for CWU

6. The leachate monitoring data must be submitted in an electronic format. The information is to be submitted as fixed-width text files formatted as found at www.epa.state.il.us/land/waste-mgmt/groundwater-monitoring.html

7. The development of the leachate re-circulation system as proposed in application Log No. 2005-070 and revised in Log No. 2013-496 (Modification No. 44) is hereby approved. Operation of the leachate re-circulation system shall not be initiated until an acceptance report has been submitted to and approved by the Illinois EPA as a significant modification pursuant to 35 Ill. Adm. Code, Sections 811.505(d) and 813.203.

8. Modification No. 44 approved the addition of leachate recirculation wells as proposed in application Log No. 2013-496, shown on Drawing No. PLCS-9 dated February 4, 2014. Crushed CRT panel glass used as permeable material in leachate recirculation trenches and wells must meet the requirements specified in

Condition No. II.5(ab) and must have a minimum hydraulic conductivity of 3×10^{-2} cm/sec.

9. As proposed in application Log No. 2008-054, upon commencement of waste disposal operations in the CWU, leachate monitoring points L309P and L311P shall be analyzed for PCBs every month. Monitoring data for these analyses shall be submitted along with the leachate monitoring data required by Condition No. VII.5 of this permit.
10. Leachate shall not be re-circulated in the CWU.
11. Leachate from the CWU shall be:
 - a. Solidified in accordance with the approved operating plan and disposed in the Phase 1A of the CWU; or
 - b. Transported offsite to a licensed waste treatment facility for thermal destruction, recycling, chemical oxidation, or other treatment in accordance with Toxic Substance Control Act; or
 - c. Transported to Peoria Disposal Company's Industrial Wastewater Treatment Facility.
12. If and when the local siting authority for Clinton Landfill 3 grants local siting approval specifically allowing PCB waste to be disposed of in the CWU and the USEPA permits the CWU as a "chemical waste landfill" as defined in 40 CFR 761.3, leachate from the CWU must be managed in accordance with Condition No. VII.11 (a) and (b) of this permit. In the event the operator wants to transport leachate offsite for treatment and discharge under a NPDES permit, the operator shall provide written notification to the Illinois EPA, Bureau of Land, Permit Section that necessary approval has been obtained from the wastewater treatment plant to accept leachate from the CWU. The wastewater treatment facility must be made aware that PCB wastes which are allowed by 40 CFR 761 to be disposed in a "chemical waste landfill" as defined in 40 CFR 761.3 are being accepted in the CWU. This documentation shall be provided prior to commencement of shipping of leachate to the wastewater treatment plant and must include a copy of letter of approval from the wastewater treatment plant.
13. Leachate from the CWU shall be pumped to the CWU leachate storage tank and managed in accordance with Condition No. VII.11. Leachate from the CWU shall not be recirculated in the MSW unit or in any way comingled with the leachate from the MSW unit.

Page 47

14. The redundant leachate drainage layer located between the upper and lower liner systems of the CWU shall be monitored in accordance with the Leachate Monitoring and Response Action Plan provided in application Log No. 2010-146, addendum dated November 18, 2010 (Modification No. 16).

VIII. GROUNDWATER MONITORING

1. The groundwater monitoring program must be capable of determining background groundwater quality hydraulically upgradient of and unaffected by the units and to detect, from all potential sources of discharge, any releases to groundwater within the facility. The Illinois EPA reserves the right to require installation of additional monitoring wells as may be necessary to satisfy the requirements of this permit.
2. The groundwater monitoring wells shall be constructed and maintained in accordance with the requirements of 35 Ill. Adm. Code, 811.318(d) and designs approved by the Illinois EPA.
3. Groundwater monitoring wells shall be installed in the locations shown in Drawing P-GWMP, of the February 18, 2011 addendum of the permit application, Log No. 2010-268 and application Log No. 2010-316 and screened in the hydrogeologic unit(s) identified as potential contaminant pathway(s) within the zone of attenuation. All wells as listed in Condition VIII.9 must be installed so that samples may be taken prior to waste placement.
4. Within 60 days of installation of any groundwater monitoring well, boring logs compiled by a qualified geologist, well development data and as-built diagrams shall be submitted to the Illinois EPA utilizing the enclosed "Well Completion Report" form. For each well installed pursuant to this permit, one form must be completed.
5. Groundwater monitoring wells shall be easily visible, labeled with the Illinois EPA monitoring point designations and fitted with padlocked protective covers.
6. In the event that any well becomes consistently dry or unserviceable and therefore requires replacement, a replacement well shall be installed within ten (10) feet of the existing well. The Illinois EPA shall be notified in writing at least 15 days prior to the installation of all replacement wells. A replacement well that is more than ten feet from the existing well or which does not monitor the same geologic zone is considered to be a new well and must be approved via a significant modification permit.

7. All borings, wells and piezometers not used as monitoring points shall be abandoned in accordance with the standards in 35 Ill. Adm. Code 811.316, and the decommissioning and reporting procedures contained in the Illinois Department of Public Health's (IDPH) Water Well Construction Code, 77 Ill. Adm. Code, Part 920 (effective 1/1/92). In the event specific guidance is not provided by IDPH procedures, the enclosed Illinois EPA monitoring well plugging procedures shall be followed.
8. Groundwater sampling and analysis shall be performed in accordance with the requirement of 35 Ill. Adm. Code 811.318(e) and the specific procedures and methods proposed in Application Log No. 2012-484 and approved by the Illinois EPA on March 2, 2013 as Permit Modification No. 36.
9. The following monitoring points are to be used in the groundwater detection monitoring program for this facility:

UPPER RADNOR TILL SAND (URTS)

Temporary Upgradient Well

<u>Applicant Designation</u>	<u>Illinois EPA Designation</u>
EX-23S	G07S

Wells Within the Zone of Attenuation

<u>Applicant Designation</u>	<u>Illinois EPA Designation</u>
G49S	G49S
G50S	G50S

Compliance Boundary Wells

<u>Applicant Designation</u>	<u>Illinois EPA Designation</u>
G54S	G54S

Piezometers

<u>Applicant Designation</u>	<u>Illinois EPA Designation</u>
G53S	G53S
G57S	G57S

LOWER RADNOR TILL SAND WELLS

Upgradient Wells

<u>Applicant Designation</u>	<u>Illinois EPA Designation</u>
G01M	G01M
G04M	G04M
G05M	G05M
G08M	G08M

Wells Within Zone of Attenuation

<u>Applicant Designation</u>	<u>Illinois EPA Designation</u>
G16M	G16M
R17M	R17M
G18M	G18M
G19M	G19M
G20M	G20M
G40M	G40M
G47M	G47M
G48M	G48M
G49M	G49M
G58M	G58M

Compliance Boundary Wells

<u>Applicant Designation</u>	<u>Illinois EPA Designation</u>
G39M	G39M

Piezometers

<u>Applicant Designation</u>	<u>Illinois EPA Designation</u>
EX-4	EX-4
EX-5	EX-5
EX-6	EX-6

ORGANIC SOIL WELLS

Upgradient Wells

<u>Applicant Designation</u>	<u>Illinois EPA Designation</u>
G01D	G01D
G02D	G02D
G03D	G03D
G07D	G07D
G08D	G08D

Wells Within Zone of Attenuation

<u>Applicant Designation</u>	<u>Illinois EPA Designation</u>
G09D	G09D
G16D	G16D
R17D	R17D
G18D	G18D
R19D	R19D
G20D	G20D
G40D	G40D
G47D	G47D
G48D	G48D
G49D	G49D
G58D	G58D
G59D	G59D

Compliance Boundary Wells

<u>Applicant Designation</u>	<u>Illinois EPA Designation</u>
G39D	G39D

Piezometers

<u>Applicant Designation</u>	<u>Illinois EPA Designation</u>
G06D	G06D
G50D	G50D

ROXANA SILT-ROBEIN MEMBER WELLS

Upgradient Wells

<u>Applicant Designation</u>	<u>Illinois EPA Designation</u>
G02R	G02R
G04R	G04R
G07R	G07R
R17R	R17R
G58R	G58R

Wells Within Zone of Attenuation

<u>Applicant Designation</u>	<u>Illinois EPA Designation</u>
G08R	G08R
G09R	G09R
R16R	R16R
G18R	G18R
G19R	G19R
G20R	G20R
G40R	G40R
G47R	G47R
G48R	G48R
G49R	G49R
G59R	G59R

Compliance Boundary Wells

<u>Applicant Designation</u>	<u>Illinois EPA Designation</u>
G39R	G39R

Piezometers

<u>Applicant Designation</u>	<u>Illinois EPA Designation</u>
G20R	G20R
G04R	G04R

ADDITIONAL PIEZOMETERS

Applicant Designation

Illinois EPA Designation

EX-8S
EX-8D
EX-9

EX-8S
EX-8D
EX-9

*represents monitoring point(s) added to the monitoring program
#represents monitoring point(s) deleted from the monitoring program.

NOTES:

- a. Upgradient wells screened in the Roxana Silt-Robein Member shall be installed if a downgradient well screened in that zone contains sufficient water and is able to be monitored.
- b. Wells are to be phased in according to the schedule provided in Attachment 3 of Application Log No. 2012-216, and as shown on Drawing Nos. P-PP2 through P-PP12 of Application Log No. 2012-216. The following table shows this schedule:
- c. Piezometers are monitored for groundwater elevation data only. Piezometers denoted with a "G" will be incorporated into the detection monitoring program, in accordance with the permitted Phasing Plan. Piezometers denoted with an "EX" will be abandoned as site development progresses.

Phase	Operating Cell		Perimeter Monitoring Wells ³	Temporary Monitoring Wells ⁴
	MSW	CWU		
1	1		G01M ¹ , G01D ¹ , G02D ¹ , G08M ¹ , G08D ¹ , G08R, G09D, G09R	G10M, G10R, G10D, G11M, G11R, G11D, G12D
2	3A – 3B	CWU-1A	G04M ¹ , G06D ¹ , G16M, G16D, R16R, R17M, R17D, R17R, G39M ² , G39D ² , G39R ² , G54S, G03D ¹ , G05M ¹ , G07S ¹ , G07D ¹ , G07R ¹ , G40M, G40D, G40R, G47M, G47D, G47R, G48M, G48D, G48R, G49M, G49D, G49R, G49S, G50S, G58M, G58D, G58R, G59D, G59R	G18M, G18D, G18R, G19M, R19D, G19R, G20M, G20D, G20R

Phase	Operating Cell		Perimeter Monitoring Wells ³	Temporary Monitoring Wells ⁴
	MSW	CWU		
3	5A		G24M, G24D, G24R, G31M, G31D, G31R	G25M, G25D, G25R, G26M, G26D, G26R, G20M, G20D, G20R
4	3C – 5B	CWU-1B	G50D, G50R, G51M, G51D, G51R, G51S, G52S, G52M, G52D, G52R	G25M, G25D, G25R, G26M, G26D, G26R, G27M, G27D, G27R
5	7		G32M, G32D, G32R	G33M ⁶ , G33D ⁶ , G33R ⁶ , G34M ⁶ , G34D ⁶ , G34R ⁶ , G35M ⁶ , G35D ⁶ , G35R ⁶
6	2	CWU-2		G13M, G13D, G13R, G14M, G14D, G14R, G15M, G15D, G15R
7	4			G21M, G21D, G21R, G22M, G22D, G22R, G23M, G23D, G23R
8	6			G28M, G28D, G28R, G29M, G29D, G29R, G30S, G30M, G30D, G30R
9	8			G36S, G36M, G36D, G36R, G37S, G37M, G37D, G37R, G38S, G38M, G38D, G38R
10	9			G44S, G44M, G44D, G44R, G45S, G45M, G45D, G45R, G46S, G46M, G46D, G46R
11	10		G53S, G53D, G53R, G54M ² , G54D ² , G54R ² , G55S, G55M, G55D, G55R, G56S, G56M, G56D, G56R, G57S, G57D, G57R	

NOTES:

- i. Wells noted with a (1) are upgradient wells.
- ii. Wells denoted with a (2) are compliance boundary wells.
- iii. Perimeter Monitoring Wells are intended to be monitored through the end of the Post-Closure Care Period once becoming active. Active perimeter wells for each phase include the listed wells and all previously installed active perimeter wells.

- iv. Temporary wells are installed to monitor downgradient groundwater quality from the MSW Unit only and are to be abandoned during the development of the adjacent landfill cell to the south.
 - v. Upgradient Monitoring Wells apply to all cells once they become active.
 - vi. Groundwater Monitoring Wells G33M, G33D, G33R, G34M, G34D, G34R, G35M, G35D, and G35R will be installed only if MSW Unit Cell 7 is operated prior to the construction Chemical Waste Unit Cell CWU-2.
10. The monitoring program, approved by Permit No. 2008-054, shall continue for a minimum period of 30 years after closure and shall not cease until the conditions described in 35 Ill. Adm. Code, 811.319(a)(1)(C) have been achieved. The operator shall collect samples from all of the monitoring points listed in Condition VIII.9, test the samples for the parameters listed in Condition VIII.12 (Lists G1 and G2), and report the results to the Illinois EPA, all in accordance with the schedule in Condition VIII.18.
11. The applicable groundwater quality standards (AGQS) and the maximum allowable predicted concentrations (MAPC), as listed in Attachment 1, are subject to the following conditions:
- a. Temperature and the field parameters involving depth or elevation are not considered groundwater constituents and do not need AGQS.
 - b. For constituents which have not been detected in the groundwater, either the practical quantitation limit (PQL) or the method detection limit (MDL) shall be used as the AGQS.
 - c. MAPCs are only applicable to those wells within the zone of attenuation.
 - d. AGQS are only applicable to upgradient/background and compliance boundary wells.
12. AGQS and MAPC values must be determined for all of the parameters which appear in either Lists G1 or G2 (not including groundwater depth or elevations). The AGQS values shall be calculated using a minimum of four (4) consecutive quarters of groundwater monitoring data and employing the Upper 95% Tolerance Limit (95% UTL) statistical method described in the January 11, 2007 addendum to the application, Log No. 2005-070.

LIST G (Groundwater - Variable)

GROUNDWATER MONITORING PARAMETER STORETS

Elevation of Bottom of Well (ft. MSL)	72020
(Annually without dedicated pumps; every 5 years with dedicated pumps or whenever the pump is pulled)	

LIST G1 (Groundwater - Quarterly)

<u>FIELD PARAMETERS</u>	<u>STORETS</u>
-------------------------	----------------

pH	00400
Specific Conductance	00094
Temperature of Water Sample (°F)	00011
Depth to Water (ft. below land surface)	72019
Depth to Water (ft. below measuring point)	72109
Elevation of Measuring Point (Top of casing ft. MSL)	72110
Elevation of Groundwater Surface (ft. MSL)	71993

<u>INDICATOR PARAMETERS</u>	<u>STORETS</u>
-----------------------------	----------------

Ammonia (as Nitrogen; Dissolved) mg/L	00608
Arsenic (Dissolved) ug/L	01000
Boron (Dissolved) ug/L	01020
Cadmium (Dissolved) ug/L	01025
Chloride (Dissolved) mg/L	00941
Chromium (Dissolved) ug/L	01030
Cyanide (Total) mg/L	00720
Lead (Dissolved) ug/L	01049
Magnesium (Dissolved) mg/L	00925
Mercury (Dissolved) ug/L	71890
Nitrate (as Nitrogen, Dissolved) mg/L	00618
Sulfate (Dissolved) mg/L	00946
Total Dissolved Solids (TDS, 180°C; Dissolved) mg/L	70300
Zinc (Dissolved) ug/L	01090

NOTES:

- i. All parameters with the "(Dissolved)" label to the right shall be determined using groundwater samples which have been filtered through a 0.45 micron filter. All other parameters shall be determined from unfiltered samples.

Page 56

- ii. Maximum allowable predicted concentrations (MAPCs) and applicable groundwater quality standards (AGQS) are given in ug/L except as otherwise noted. Also, the monitoring results should be reported in ug/L units unless otherwise indicated.
- iii. List G1 and List G2 AGQS/MAPC values are included in Attachment 1.

LIST G2 (Groundwater - Semiannual)

<u>PARAMETERS</u> (ug/L)	<u>STORETS</u>
Acetone	81552
Acrylonitrile	34215
Benzene	34030
Bromobenzene	81555
Bromochloromethane (chlorobromomethane)	77297
Bromodichloromethane	32101
Bromoform (Tribromomethane)	32104
n-Butylbenzene	77342
sec-Butylbenzene	77350
tert-Butylbenzene	77353
Carbon Disulfide	77041
Carbon Tetrachloride	32102
Chlorobenzene	34301
Chloroethane (Ethyl Chloride)	34311
Chloroform (Trichloromethane)	32106
o-Chlorotoluene	77275
p-Chlorotoluene	77277
Dibromochloromethane	32105
1,2-Dibromo-3-Chloropropane	38760
1,2-Dibromoethane	77651
1,2-Dichlorobenzene	34536
1,3-Dichlorobenzene	34566
1,4-Dichlorobenzene	34571
trans-1,4-Dichloro-2-Butene	49263
Dichlorodifluoromethane	34668
1,1-Dichloroethane	34496
1,2-Dichloroethane	34531
1,1-Dichloroethylene	34501
cis-1,2-Dichloroethylene	77093
trans-1,2-Dichloroethylene	34546
1,2-Dichloropropane	34541
1,3-Dichloropropane	77173
2,2-Dichloropropane	77170

LIST G2 (Groundwater - Semiannual) (Cont.)

<u>PARAMETERS</u> (ug/L)	<u>STORETS</u>
1,1-Dichloropropene	77168
1,3-Dichloropropene	34561
cis-1,3-Dichloropropene	34704
trans-1,3-Dichloropropene	34699
Ethylbenzene	78113
Hexachlorobutadiene	39702
2-Hexanone (Methyl Butyl Ketone)	77103
Isopropylbenzene	77223
p-Isopropyltoluene	77356
Methyl Bromide (Bromomethane)	34413
Methyl Chloride (Chloromethane)	34418
Methylene Bromide (Dibromomethane)	77596
Dichloromethane	34423
Methyl Ethyl Ketone	81595
Methyl Iodide (Iodomethane)	77424
4-Methyl-2-Pentanone	78133
Naphthalene	34696
Oil (Hexane-Soluble) (mg/L)	00550
n-Propylbenzene	77224
Styrene	77128
1,1,1,2-Tetrachloroethane	77562
1,1,2,2-Tetrachloroethane	34516
Tetrachloroethylene	34475
Tetrahydrofuran	81607
Toluene	34010
Total Phenolics	32730
1,2,3-Trichlorobenzene	77613
1,2,4-Trichlorobenzene	34551
1,1,1-Trichloroethane	34506
1,1,2-Trichloroethane	34511
Trichloroethylene	39180
Trichlorofluoromethane	34488
1,2,3-Trichloropropane	77443
1,2,4-Trimethylbenzene	77222
1,3,5-Trimethylbenzene	77226
Vinyl Acetate	77057
Vinyl Chloride	39175
Xylenes	81551

LIST G3 (Groundwater-Semiannual)

<u>PARAMETERS (ug/L)</u>	<u>STORETS</u>
Acenaphthene	34205
Acenaphthylene	34200
Anthracene	34220
Benzene	34030
Benzo(a)anthracene	34526
Benzo(a)pyrene	34247
Benzo(b)fluoranthene	34230
Benzo(ghi)perylene	34521
Benzo(k)fluoranthene	34242
Crysene	34320
Pentachlorophenol	39032
Dibenzo(a,h)anthracene	34556
Ethylbenzene	78113
Fluoranthene	34376
Indeno(1,2,3-cd)pyrene	34403
Naphthalene	34696
PCB-Total	39516
Phenanthrene	34461
Pyrene	34469
Toluene	34010
Xylenes-Total	81551

NOTES:

- i. All parameters with the "(Dissolved)" label to the right shall be determined using groundwater samples which have been filtered through a 0.45 micron filter. All other parameters shall be determined from unfiltered samples.
- ii. Maximum allowable predicted concentrations (MAPCs) and applicable groundwater quality standards (AGQS) are given in ug/L except as otherwise noted. Also, the monitoring results should be reported in ug/L units unless otherwise indicated.
- iii. List G1 and List G2 AGQS/MAPC values are included in Attachment 1.
13. Pursuant to 35 Ill. Adm. Code, 811.319(a)(4)(A), any of the following events shall constitute an observed increase only if the concentrations of the constituents monitored can be measured at or above the practical quantitation limit (PQL):

- a. The concentration of any constituent in List G1 of Condition VIII.12 shows a progressive increase over eight (8) consecutive quarters.
 - b. The concentration of any constituent monitored in accordance with List G1, List G2, or List G3 of Condition VIII.12 exceeds the MAPC at an established monitoring point within the zone of attenuation.
 - c. The concentration of any organic constituent in List G2 or List G3, monitored in accordance with Condition VIII.12 exceeds the preceding measured concentration at any established point.
 - d. The concentration of any constituent monitored at or beyond the edge of the zone of attenuation (compliance boundary) exceeds its AGQS, or pursuant to 811.320(d) any constituent monitored at an upgradient well, exceeds its AGQS.
14. For each round of sampling described in Condition 10 of this Section, the operator must determine if an observed increase has occurred within 90 days of the date initial sampling. If an observed increase is identified, the operator must also notify the Illinois EPA in writing and follow the confirmation procedures of 35 Ill. Adm. Code, 811.319(a)(4)(B). Furthermore, the operator must complete the confirmation procedures within 180 days of the initial sampling event.
 15. Upon confirmation of a monitored increase and within 180 days of the initial sampling date, the operator shall submit a permit application for a significant modification to demonstrate an alternate source per 35 Ill. Adm. Code 811.319(a)(4)(b)(iii) or begin an assessment monitoring program in order to determine whether the solid waste disposal facility is the source of the contamination and to provide information needed to carry out a groundwater impact assessment in accordance with 35 Ill. Adm. Code 811.319(b).
 16. In the event that an alternative source demonstration is denied, pursuant to 35 Ill. Adm. Code 813.105, the operator must commence sampling for the constituents listed in 35 Ill. Adm. Code 811.319(b)(5), and submit an assessment monitoring plan as a significant permit modification, both within 30 days after the dated notification of Agency denial. The operator must sample the well or wells that exhibited the confirmed increase.

In the event that assessment monitoring is required as a result of organic detections in the G52 well nest, well nest G53 shall be installed and monitored as part of the assessment.

Should the results of the assessment monitoring plan indicate impacts due to the facility, the requirements and timelines of 35 Ill. Adm. Code 811.324, 811.325 and 811.326 must be followed and address the entirety of the Uppermost Aquifer, which includes the Mahomet Aquifer.

17. The first quarterly statistical evaluations shall be performed on groundwater samples taken during the months of July – August, 2007 and the results submitted to the Illinois EPA by October 15, 2007.
18. The schedule for sample collection and submission of quarterly monitoring results is as follows:

<u>Sampling Quarter</u>	<u>Sampling Due</u>	<u>Report Due Date</u>
Jan-Feb (1st)	List G1	April 15
April-May (2nd)	List G, G1 and G2	July 15
July-Aug (3rd)	List G1	October 15
Oct-Nov (4th)	List G1 and G2	January 15

G – Well Depth
 G1 - Routine Groundwater Parameters
 G2 - Semiannual Groundwater Parameters

In addition, all wells installed for CWU1 and CWU2 (listed in Condition No. VIII.9) shall monitor List G3 for the 2nd and 4th quarter events.

19. Elevation of stick-up is to be surveyed and reported to the Illinois EPA:
 - a. When the well is installed (with the as-built diagrams),
 - b. Every two years thereafter, or
 - c. Whenever there is reason to believe that the elevation has changed.
20. Annually, the operator shall prepare an evaluation of the groundwater flow direction and the hydraulic gradients at the facility using the groundwater surface elevations (Storet #71993) determined for each monitoring event. This assessment shall be submitted with the monitoring results due on July 15.
21. All monitoring points shall be maintained in accordance with the approved permit application such that the required samples and measurements may be obtained.

Page 61

22. Background concentrations which exhibit a statistically significant change shall be adjusted and updated in accordance with 35 Ill. Adm. Code 811.320(d)(2) and submitted to the Illinois EPA as a permit modification.
23. Information required by Conditions VIII.10 and VIII.18 must be submitted in an electronic format. The information is to be submitted, as fixed-width text files formatted as found at www.epa.state.il.us/land/waste-mgmt/groundwater-monitoring.html.
24. Note b in Condition No. VIII.9 identifies the phases in which this landfill will be developed and the groundwater monitoring wells associated with each phase. Operating authorization allowing waste disposal to begin in a new phase will not be approved unless the operator has, in a permit application, either:
 - a. Provided documentation that the groundwater monitoring wells, associated with the new phase, have been installed, or
 - b. Satisfactorily demonstrated that any wells associated with the new phase, which have not been installed, are not necessary to adequately monitor the groundwater.
25. On October 4, 2012, revisions to the existing groundwater parameter lists were adopted by the Illinois Pollution Control Board Rule Making R08-18: Amendments to Groundwater Quality Standards 35 Ill. Adm. Code 620 regulations; which can be found at <http://www.ipcb.state.il.us/documents/dsweb/Get/Document-77625>. All newly added parameters are underlined in this document. The facility shall propose to establish AGQS values for all 35 Ill. Adm. Code 620.410 a) b) and e) parameters based upon a minimum of (4) consecutive quarters of analytical data from 4th quarter 2013 through 3rd Quarter 2014, using the currently permitted statistical methodology. Only parameters which do not currently have an approved AGQS value are required to be proposed as a result of this condition. This information shall be submitted as a permit application that at a minimum includes the analytical groundwater data sheets, statistical calculations used to calculate the new AGQS values, and the proposed values presented in tabular format. The proposed AGQS values shall be submitted to the Illinois EPA in the form of a significant modification permit application no later than January 15, 2015.
26. The facility shall replace groundwater monitoring well G20R with well R20R. The applicant shall locate the replacement well within 10 feet of the existing well or shall submit to the Illinois EPA a significant modification to permit application or an addendum to an existing permit application providing justification requesting a change in location. The replacement well shall be

advanced using a continuous sampler during installation and screened at approximately the same depth as well G20R.

IX. LANDFILL GAS MANAGEMENT/MONITORING

1. The landfill gas monitoring plan described in Application Log No. 2005-070 is approved. Monitoring devices shall be put into service in accordance with the following schedule:
 - a. The gas monitoring probes within the waste boundary shall be installed and put into service within ninety days after final cover has been applied to the various areas where they are located.
 - b. Monitoring devices outside the waste boundary shall be put into service when waste has been disposed in the landfill near that monitoring location.
 - c. Monitoring devices within buildings shall be put into service when waste disposal begins and the building has been constructed.
 - d. Ambient air monitoring devices shall be put into service downwind of the disposal unit after initial receipt of waste.
 - e. Documentation that all the gas monitoring probes outside the waste boundary and the methane monitoring devices within the on-site buildings and ambient air monitoring devices have been installed shall be included with the application for a significant modification requesting authorization to place waste upon new liner.
2. The gas monitoring probes both inside and outside the waste boundary shall be monitored for the following parameters:
 - a. Methane;
 - b. Pressure;
 - c. Nitrogen*;
 - d. Oxygen; and
 - e. Carbon Dioxide

*NOTE: For routine monitoring, Nitrogen may be reported as the net remaining volume fraction after the other measured constituents have been accounted for.

3. The ambient air monitoring devices described in the Application Log No. 2005-070 shall be used to test the air downwind of the landfill for methane.

Page 63

4. All buildings within the facility boundaries shall be monitored continuously for methane.
5. Gas monitoring shall continue for at least 30 years after closure and may be discontinued only after the conditions described in 35 Ill. Adm. Code, Section 811.310(c)(4) have been achieved.
6. Except for the perimeter gas probes mentioned in Condition No. IX.13 of this permit, sampling and testing of the gas monitoring probes and ambient air monitoring shall be performed at least yearly throughout the remaining operating life and during the post-closure care period. Perimeter gas probes PGP-2, PGP-3, PGP-8, PGP-14 and PGP-16 shall continue to be monitored on a monthly basis.
7. Pursuant to 35 Ill. Adm. Code 811.311, in the event of any of the occurrences listed below, the operator must take the steps described in the last two paragraphs of this condition to ensure the protection of human health:
 - a. A methane concentration greater than 50 percent of the lower explosive limit in air is detected in any of the below ground monitoring devices outside the waste boundary;
 - b. A methane concentration greater than 50 percent of the lower explosive limit in air is detected during ambient air monitoring;
 - c. A methane concentration greater than 25 percent of the lower explosive limit in air is detected in any building on or near the facility; or
 - d. Malodors attributed to the unit are detected beyond the property boundary.

First, within two business days of the occurrence, the operator must notify the Illinois EPA in writing using the form LPC-591, pursuant to 35 Ill. Adm. Code 811.311(b)(1). The notification must identify the location of the occurrence and describe its nature (quantitatively if possible). If the gas exceedence is corrected within 30 days, a follow up LPC-591 form may be submitted to the Illinois EPA describing the correction and providing confirmation test results.

Second, if a follow up LPC-591 is not submitted, then within 180 days of the occurrence, the operator must submit to the Illinois EPA an application for a significant modification that either: 1) proposes a gas collection/management system or modifications to the existing gas collection/management system, or 2) demonstrates that the facility is not the cause of the occurrence.

8. The gas probes shall be inspected at least monthly for structural integrity and proper operation.
9. The results from gas monitoring for each calendar year shall be submitted to the Illinois EPA in the annual report required by 35 Ill. Adm. Code, Section 813.504.
10. At the end of the post-closure care period, the gas monitoring probes shall be decommissioned. The probes outside the waste boundary shall be decommissioned using the method described in the Illinois EPA monitoring well plugging procedure guidance enclosed along with Permit No. 2005-070-LF. In decommissioning the probes within the waste disposal unit, the pipes shall be cut off at least two (2) feet below the low permeability layer and plugged. Then the low permeability layer, the protective layer and the vegetation shall be restored in the excavated areas.
11. The development of the landfill gas collection and disposal system as proposed in application Log No. 2005-070 and as revised in application Log Nos. 2008-054 (Modification No. 9) and 2011-097 (Modification No. 23) is hereby approved. Upon completion of each phase of the landfill gas collection and disposal system the operator:
 - a. May temporarily operate the subject phase of the landfill gas collection and disposal system for a period not exceeding 180-days as a part of a "shakedown period". The temporary operation shall not be in violation of Condition No. V.2 of this permit and/or any condition included in the permit issued by the Illinois EPA's Bureau of Air; and
 - b. Shall submit an acceptance report to the Illinois EPA pursuant to the requirements of 35 Ill. Adm. Code, Sections 811.505(d) and 813.203. The acceptance report shall be submitted in the form of a permit application for significant modification and shall demonstrate that the construction of the subject phase of the landfill gas collection and disposal system has been completed in accordance with the approved designs. The permit application shall be submitted within 45-days of the commencement of the temporary operation referenced in item (a) above.
12. Modification No. 9 approved revision to the gas management system to exclude gas collection from within the CWU. However, if any of the conditions listed in 35 Ill. Adm. Code 811.311(a) are attributable to CWU, the operator shall notify the Illinois EPA in accordance with 35 Ill. Adm. Code 811.311(b) and submit a significant modification meeting the requirements of 35 Ill. Adm. Code 811.311(d) within 180 days of the occurrence.

Page 65

13. The Recommended Action Plan to address methane exceedences observed in perimeter gas probes PGP-2, PGP-3, PGP-8, PGP-14 and PGP-16 provided in application Log No. 2013-580 is hereby approved subject to the following conditions:
 - a. A Landfill Gas Assessment Report including results of the activities described in the above referenced plan shall be submitted to the Illinois EPA in the form of a permit application for significant modification no later than December 15, 2014. In the event methane exceedences continue to be observed the Landfill Gas Assessment Report shall propose modifications to the existing landfill gas management system or demonstrate that the Facility is not the cause of the exceedences; and
 - b. The requirements included in the last paragraph of Condition No. IX.7 of this permit does not apply to the methane exceedences observed in perimeter gas probes PGP-2, PGP-3, PGP-8, PGP-14 and PGP-16. This exemption expires December 15, 2014. All other requirements outlined in Condition No. IX.7 remain in effect. (Modification No. 46).
14. The operation of the active landfill gas extraction system as proposed in permit application Log Nos. 2012-095 and 2012-518 is hereby approved. Operation of future increments to the landfill gas collection system (beyond those documented in Log Nos. 2012-095 and 2012-518) shall be in accordance with the requirements specified in Condition No. IX.11 of this permit (Modification Nos. 31 and 35).

X. CLOSURE/POST CLOSURE CARE AND FINANCIAL ASSURANCE

1. Per 35 Ill. Adm. Code Part 813.401(a), the landfill operator shall send a notice of closure to the Illinois EPA within 30-days after the date of the final volume of waste is received. The facility shall be closed in accordance with the closure plan provided in Application Log No. 2011-505 (Modification No. 29). The closure plan includes a plan for temporary suspension of waste acceptance. Upon completion of closure activities, the operator shall notify the Illinois EPA that the site has been closed in accordance with the approved closure plan utilizing the Illinois EPA's "Affidavit for Certification of Closure of Solid Waste Landfills permitted under 35 Ill. Adm. Code Parts 813 and 814".
2. Inspections of the closed landfill shall be conducted in accordance with the approved post-closure care plan in Application Log No. 2008-054 (Modification No. 9). Records of field investigations, inspections, sampling and corrective action taken are to be maintained at the site and made available to Illinois EPA

personnel. During the post-closure care period, these records are to be maintained at the office of the site operator.

3. If necessary, the soil over the entire planting area shall be amended with lime, fertilizer and/or organic matter. On side slopes, mulch or some other form of stabilizing material is to be provided to hold seed in place and conserve moisture.
4. The minimum post-closure care period for this municipal solid waste landfill (MSWLF) is thirty years. When the post-closure care period has been completed, the operator shall notify the Illinois EPA utilizing the Illinois EPA's LPC-PA1 application form, entitled "General Application for Permit."
5. The owner or operator shall provide financial assurance for closure and post-closure care pursuant to 35 Ill. Adm. Code, Section 811.700(b). Financial assurance shall be required only for those areas for which authorization to operate has been obtained or is being requested.
6. The total cost estimate for closure and post-closure care of the MSW Unit and CWU approved by Modification No. 46 (Log No. 2014-145) is \$10,742,793.00. The total cost estimates include \$4,762,084.00 for premature closure and \$5,980,709.00 for post-closure care. Cost estimates approved in Modification No. 46 account for closure and post-closure care of Phases 1A, 1B, 1C, 3A, 3B and 5A of the MSW Unit covering an area of approximately 32.8 acres; and Phase 1A of the CWU covering an area of approximately 6.14 acres.
7. The owner or operator shall increase the total amount of financial assurance so as to equal the current cost estimate within 90 days of an increase in the current cost estimate in accordance with 35 Ill. Adm. Code, Section 811.701(b) and Condition No. X.5 of this permit.
8. The owner or operator shall adjust the cost estimates for closure, post-closure, and corrective action for inflation on an annual basis during the following time periods:
 - a. The active life of the unit for the closure cost;
 - b. The active life and post-closure care period for the post-closure cost; and
 - c. Until any corrective action program is completed in accordance with 35 Ill. Adm. Code Section 811.326, for the cost of corrective action.

Each year, no later than June 1 of that year, the owner or operator shall submit a revised cost estimate in the form of a permit application for significant

modification. This application shall provide an update to the cost estimate or a certification that there are no changes to the current cost estimates.

XI. RAIL OFF-LOADING FACILITY

1. The Rail Off-Loading Facility shall be constructed, operated and maintained in accordance with the designs, plans and specifications provided in application Log No. 2007-459 and approved in Modification No. 2.
2. The Rail Off-Loading Facility shall be located within the Clinton Landfill 3 facility boundaries as shown on Drawing P-ROF1 submitted in the original application Log No. 2007-459 and approved in Modification No. 2.
3. The Rail Off-Loading Facility consists of a Gondola Car Off-Loading Area and an Intermodal Container Off-Loading Area.
4. The Gondola Car Off-Loading Area includes an overhead structure under which gondola cars will be off-loaded and an elevated platform to support equipment that will transfer wastes from the gondola cars to dump trucks. Litter screening as shown on Drawings P-ROF4 and P-ROF5, provided in application Log No. 2007-459, addendum dated February 11, 2008, shall be installed around the Gondola Car Off-Loading Area.
5. Gondola cars shall be off-loaded only within the Gondola Car Off-Loading Area.
6. The Gondola Car Off-Loading Area and the area around it shall be cleared of litter daily. The operator shall make an effort to prevent litter from leaving the gondola car off-loading building.
7. No more than four (4) gondola cars shall remain inside the Gondola Car Off-Loading Area at the end of each working day. Gondola cars that contain waste at the end of each working day shall be securely covered to control potential odors. Wastes shall be removed from each gondola car no later than the business day following receipt. If required odor control measures described in the Operating Plan received included in application Log No. 2013-496 (Modification No. 44) shall be implemented.
8. A stable working surface shall be provided for the waste off-loading equipment as well as for the trucks used to transfer waste from the Rail Off-Loading Facility to the active face. The surficial gravel within the Gondola Car Off-Loading Area shall be inspected at least once every week. If required, the surficial gravel shall be removed and replaced with clean gravel to prevent tracking of residues out of the Gondola Car Off-Loading Area.

9. Intermodal containers shall be removed from railcars and transported to the landfill active face. Intermodal containers that cannot be emptied by the end of the operating day shall remain sealed and stored at the Intermodal Container Off-Loading Area or near the active face of Clinton Landfill 3 within the permitted waste boundary until the next working day. No more than eight (8) intermodal containers shall be stored overnight.
10. All wastes received at the Rail Off-Loading Facility (except for un-authorized wastes mentioned in Condition No. II.10) shall be disposed at Clinton Landfill 3.
11. All unauthorized waste received at the Rail Off-Loading Facility shall be managed in accordance with Condition No. II.10 of this permit.
12. Upon completion of construction of the Rail Off-Loading Facility, the operator shall:
 - a. Provide an acceptance report pursuant to 35 Ill. Adm. Code 811.505(d) on its construction to the Illinois EPA's Champaign Regional Office. Upon receipt of notification, the inspector shall be allowed fifteen working days to examine the construction. The Illinois EPA is not obligated to approve the construction or certification. The operator may start receiving waste at the Rail Off-Loading Facility if, having complied with the conditions of this section and the designs submitted in application Log No. 2007-459, the operator is not informed of a problem by the Illinois EPA or its agents; and
 - b. At the same time Illinois EPA's Champaign Regional Office is given notification that the construction of the Rail Off-Loading Facility has been completed, the Permit Section shall be provided with the information required in acceptance report pursuant to 35 Ill. Adm. Code 811.505(d) on its construction.
13. The Rail Off-Loading Facility shall be closed prior to, or concurrently with Clinton Landfill 3 final closure.
14. The Rail Off-Loading Facility shall be closed in accordance with the closure plan provided in application Log No. 2011-505 (Modification No. 29). A certification report documenting closure of the Rail Off-Loading Facility shall be submitted to the Illinois EPA in the form of an application for Significant Modification within 90-days of completion of closure.
15. Wastes shall be received at the Rail Off-Loading Facility only during the landfill operating hours specified in Condition No. II.11 of this permit.

Page 69

16. Transportation of waste from the Rail Off-Loading Facility to the Clinton Landfill 3 active face shall occur on roads that are within the Clinton Landfill 3 facility boundaries.
17. Except as provided in Condition Nos. XI. 7 and XI. 9, no waste shall remain at the Rail Off-Loading Facility when the said facility is not operating.
18. All the relevant conditions of Section II of this permit, including but not limited to control of dust, litter, odor and vectors shall be complied with during the operation of the Rail Off-Loading Facility.

XII. MANAGEMENT OF EXCESSIVELY DUSTY WASTES

1. The conditions of this section apply to the management of excessively dusty wastes within a purpose built structure referred to as Waste Processing Facility.
2. The Waste Processing Facility shall be constructed, operated and maintained in accordance with the design, plans and specifications provided in application Log No. 2007-509 (Modification No. 3) and Log No. 2011-505 (Modification No. 29).
3. The Waste Processing Facility shall be located within the waste boundaries of Clinton Landfill 3 and shall be used to process excessively dusty wastes prior disposal in Clinton Landfill 3, MSW Unit.
4. Waste Processing Facility shall not be used to manage wastes destined for disposal in CWU.
5. The Waste Processing Facility shall be of stressed membrane, metal frame construction as described in application Log No. 2007-509. The liner and leachate collection system in the Waste Processing Cell within the Waste Processing Facility shall consist of the following:
 - 3-foot thick compacted clay liner with permeability no greater than 1×10^{-7} cm/sec;
 - 60-mil textured HDPE liner;
 - 1-foot thick sand drainage layer with a permeability no less than 3×10^{-2} cm/sec;
 - 8 ounce per square yard non-woven geotextile; and
 - 6-inch thick random fill
6. The operator shall make an effort to prevent litter from leaving the Waste Processing Cell. The Waste Processing Facility and area around it shall be cleaned of litter every day.

7. A stable working surface shall be provided for trucks and mechanical mixing equipment accessing the Waste Processing Facility. The surficial aggregate within the Waste Processing Facility shall be inspected at least once every week. If required, the surficial aggregate shall be replaced with clean aggregate to prevent tracking of residues to areas outside of the Waste Processing Facility.
8. Except as allowed in Condition No. XII.9, only clean water shall be used to moisture condition the excessively dusty waste. This process shall be carried out in the Waste Processing Cell within the Waste Processing Facility using mechanical equipment to blend wastes and water together.
9. All liquids draining from the conditioning of dusty wastes shall be collected in the Liquid Collection Sump and managed as leachate. These liquids may be re-used to moisture condition subsequent batches of dusty wastes.
10. All wastes received at the Waste Processing Facility (except for unauthorized wastes mentioned in Condition No. II.10) shall be disposed at Clinton Landfill 3, MSW Unit.
11. All unauthorized wastes received at the Waste Processing Facility shall be managed in accordance with Condition No. II.10 of this permit.
12. Upon completion of construction of the Waste Processing Facility, the operator shall submit an acceptance report, pursuant to 35 Ill. Adm. Code 811.505(d), to the Illinois EPA. The acceptance report shall be submitted in the form an application for significant modification and shall demonstrate that the construction has been completed in accordance with the approved designs. The Waste Processing Facility shall be placed in service only after approval has been obtained from the Illinois EPA.
13. As noted in application Log No. 2007-509, the Waste Processing Facility is intended to be portable in that it can be located anywhere within the permitted Clinton Landfill 3 waste boundary. The operator shall comply with the requirements of Condition No. XII.12 of this permit every time the Waste Processing Facility is relocated. Additionally, information about management of wastes and waste residues at the prior location of the Waste Processing Facility has to be provided as well.
14. The Waste Processing Facility shall be closed prior to or concurrently with the Clinton Landfill 3 final closure.

15. The Waste Processing Facility shall be closed in accordance with the closure plan provided in application Log No. 2011-505 (Modification No. 29). A certification report documenting the closure of the Waste Processing Facility shall be submitted to the Illinois EPA in the form of an application for Significant Modification within 90-days of completion of closure.
16. Wastes shall be received at the Waste Processing Facility only during the landfill operating hours specified in Condition No. II.11 of this permit.
17. No liquid wastes shall be received at the Waste Processing Facility.
18. The construction of the Waste Processing Facility approved in this permit does not relieve the permittee to file reports and/or obtain applicable permit(s) from the Illinois EPA's Bureau of Air. Furthermore, the operation of the Waste Processing Facility shall not violate any conditions included in the permit(s) issued by the Illinois EPA's Bureau of Air.
19. The Waste Processing Facility and surrounding area shall be inspected each day during which wastes are processed or otherwise contained within the building. The integrity of the following features shall be inspected to ensure that they remain functional:
 - Waste Processing Cell, including unloading pad and leachate collection system;
 - Leachate storage tanks;
 - Waste Processing Facility roof and sidewalls; and
 - Surface water controls.
20. The operator shall make an effort to process dusty wastes delivered to the Waste Processing Facility prior to the end of the operating day. However, in no case shall the unprocessed waste be stored for more than 72 hours prior to disposal. The maximum volume of waste in storage at any time shall not exceed 120 cubic yards.
21. All relevant conditions of Section II of this permit, including but not limited to control of dust, litter, odor and vectors shall be complied with during the operation of the Waste Processing Facility.

XIII. REPORTING REQUIREMENTS

1. The annual certification shall be submitted to the Illinois EPA during operation and for the entire post-closure monitoring period, pursuant to 35 Ill. Adm. Code 813.501. The certification shall be signed by the operator or duly authorized agent, shall be filed each year by May 1 of the following year, and shall state:

Page 72

- a. All records required to be submitted to the Illinois EPA pursuant to 35 Ill. Adm. Code 858.207 and 858.308 have been timely and accurately submitted; and
 - b. All applicable fees required by the Act have been paid in full.
2. The annual report for each calendar year shall be submitted to the Illinois EPA by May 1 of the following year pursuant to 35 Ill. Adm. Code 813.504. The annual report shall include:
 - a. Information relating to monitoring data from the leachate collection system, groundwater monitoring network, gas monitoring system and any other monitoring data specified in this permit, including:
 - i. Summary of monitoring data for the calendar year;
 - ii. Dates of submittal of comprehensive monitoring data to the Illinois EPA during the calendar year;
 - iii. Statistical summaries and analysis of trends;
 - iv. Changes to the monitoring program; and
 - v. Discussion of error analysis, detection limits and observed trends.
 - b. Proposed activities including:
 - i. Amount of waste expected in the next year;
 - ii. Structures to be built within the next year; and
 - iii. New monitoring stations to be installed within the next year.
 - c. Any modification or significant modification affecting operation of the facility; and
 - d. The signature of the operator or duly authorized agent as specified in 35 Ill. Adm. Code 815.102.
3. The permittee shall submit a completed "Solid Waste Landfill Groundwater, Leachate, Facility and Gas Reporting Form" (LPC 591) as a cover sheet for any notices or reports required by the facility's permit for identification purposes. One

copy of the LPC 591 form must accompany each report; however, except for electronically formatted data, the permittee must submit one (1) original and a minimum of two (2) copies of each report you submit to the Illinois EPA. The form is not to be used for applications for supplemental permit or significant modification.

4. All certifications, logs, reports, plan sheets, notices and groundwater and leachate monitoring data, required to be submitted to the Illinois EPA by the permittee shall be mailed to the following address:

Illinois Environmental Protection Agency
Permit Section
Bureau of Land -- #33
1021 North Grand Avenue East
Post Office Box 19276
Springfield, Illinois 62794-9276

Except for electronic groundwater and leachate monitoring data, the operator shall provide the Illinois EPA with the original and two (2) copies of all certifications, logs, reports and plan sheets required by this permit.

The applicant may appeal this final decision to the Illinois Pollution Control Board pursuant to Section 40 of the Act by filing a petition for a hearing within 35 days after the date of issuance of the final decision. However, the 35-day period may be extended for a period of time not to exceed 90 days by written notice from the applicant and the Illinois EPA within the initial 35-day appeal period. If the owner or operator wishes to receive a 90-day extension, a written request that includes a statement of the date the final decision was received, along with a copy of this decision, must be sent to the Illinois EPA as soon as possible.

For information regarding the request for an extension, please contact:

Illinois Environmental Protection Agency
Division of Legal Counsel
1021 North Grand Avenue East
Post Office Box 19276
Springfield, IL 62794-9276
217/782-5544

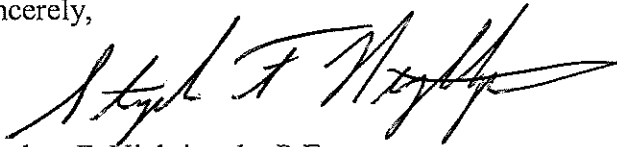
Page 74

For information regarding the filing of an appeal, please contact:

Illinois Pollution Control Board, Clerk
State of Illinois Center
100 West Randolph, Suite 11-500
Chicago, IL 60601
312/814-3620

Work required by this permit, your application or the regulations may also be subject to other laws governing professional services, such as the Illinois Professional Land Surveyor Act of 1989, the Professional Engineering Practice Act of 1989, the Professional Geologist Licensing Act, and the Structural Engineering Licensing Act of 1989. This permit does not relieve anyone from compliance with these laws and the regulations adopted pursuant to these laws. All work that falls within the scope and definitions of these laws must be performed in compliance with them. The Illinois EPA may refer any discovered violation of these laws to the appropriate regulating authority.

Sincerely,



Stephen F. Nightingale, P.E.
Manager, Permit Section
Bureau of Land

CJL

SFN:IMS:0390055036-811LF-SM47-2014359-Revised SM9.docx

IMS

Attachments: Standard Conditions
Attachment 1: AGQS/MAPC Interwell Values for Each Monitored Unit

cc: The Honorable Carolyn Peters, Mayor – The City of Clinton

STANDARD CONDITIONS FOR CONSTRUCTION/DEVELOPMENT PERMITS
ISSUED BY THE ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
BUREAU OF LAND

August 22, 2001

The Illinois Environmental Protection Act (Illinois Revised Statutes, Chapter 111-1/2, Section 1039) grants the Environmental Protection Agency authority to impose conditions on permits which it issues.

These standard conditions shall apply to all permits which the Agency issues for construction or development projects which require permits under the Bureau of Land. Special conditions may also be imposed in addition to these standard conditions.

1. Unless this permit has been extended or it has been voided by a newly issued permit, this permit will expire two years after date of issuance unless construction or development on this project has started on or prior to that date.
2. The construction or development of facilities covered by this permit shall be done in compliance with applicable provisions of Federal laws and regulations, the Illinois Environmental Protection Act, and Rules and Regulations adopted by the Illinois Pollution Control Board.
3. There shall be no deviations from the approved plans and specifications unless a written request for modification of the project, along with plans and specifications as required, shall have been submitted to the Agency and a supplemental written permit issued.
4. The permittee shall allow any agent duly authorized by the Agency upon the presentation of credentials:
 - a. to enter at reasonable times the permittee's premises where actual or potential effluent, emissions or noise sources are located or where any activity is to be conducted pursuant to this permit.
 - b. to have access to and copy at reasonable times any records required to be kept under the terms and conditions of this permit.
 - c. to inspect at reasonable times, including during any hours of operation of equipment constructed or operated under this permit, such equipment or monitoring methodology or equipment required to be kept, used, operated, calibrated and maintained under this permit.
 - d. to obtain and remove at reasonable times samples of any discharge or emission of pollutants.

- e. to enter at reasonable times and utilize any photographic, recording, testing, monitoring or other equipment for the purpose of preserving, testing, monitoring, or recording any activity, discharge, or emission authorized by this permit.
5. The issuance of this permit:
 - a. shall not be considered as in any manner affecting the title of the premises upon which the permitted facilities are to be located;
 - b. does not release the permittee from any liability for damage to person or property caused by or resulting from the construction, maintenance, or operation of the proposed facilities;
 - c. does not release the permittee from compliance with other applicable statutes and regulations of the United States, of the State of Illinois, or with applicable local laws, ordinances and regulations;
 - d. does not take into consideration or attest to the structural stability of any units or parts of the project;
 - e. in no manner implies or suggests that the Agency (or its officers, agents or employees) assumes any liability, directly or indirectly, for any loss due to damage, installation, maintenance, or operation of the proposed equipment or facility.
 6. Unless a joint construction/operation permit has been issued, a permit for operating shall be obtained from the Agency before the facility or equipment covered by this permit is placed into operation.
 7. These standard conditions shall prevail unless modified by special conditions.
 8. The Agency may file a complaint with the Board for modification, suspension or revocation of a permit:
 - a. upon discovery that the permit application contained misrepresentations, misinformation or false statements or that all relevant facts were not disclosed; or
 - b. upon finding that any standard or special conditions have been violated; or
 - c. upon any violation of the Environmental Protection Act or any Rule or Regulation effective thereunder as a result of the construction or development authorized by this permit.

SFN\STANDARD CONDITIONS

0390055036 – DeWitt County
 Clinton Landfill 3
 Permit No. 2005-070-LF
 Modification No. 47
 Log No. 2014-359

Attachment 1 AGQS/MAPC Interwell Values for Each Monitored Unit

<u>FIELD PARAMETERS</u>	<u>STORETS</u>	<u>Upper Radnor</u>	<u>Lower Radnor</u>	<u>Organic Soil</u>	<u>Roxana Silt-Robein</u>
pH	00400	6.24-7.75	5.79-7.97	5.98-8.18	6.07-8.22
Specific Conductance	00094	1108.7	1457	1383	1281
Temperature of Water Sample(° F)	00011	----	----	----	----
Depth to Water (ft. below land surface)	72019	----	----	----	----
Depth to Water(ft. below meas. point)	72109	----	----	----	----
Elev. of Meas. Pt.(Top of casing ft. MSL)	72110	----	----	----	----
Elev. of Groundwater Surface(ft. MSL)	71993	----	----	----	----
Elev. of Bottom of Well (ft. MSL)	72020	----	----	----	----
<u>INDICATOR PARAMETERS</u>	<u>STORETS</u>	<u>Upper Radnor</u>	<u>Lower Radnor</u>	<u>Organic Soil</u>	<u>Roxana Silt-Robein</u>
Ammonia (as N; Dissolved) mg/L	00608	23.5	24	25	30
Arsenic (Dissolved) ug/L	01000	125.4	273.5	170	11
Boron (Dissolved) ug/L	01020	575.5	622	530	565.5
Cadmium (Dissolved) ug/L	01025	1.0	1.0	1.0	1.0
Chloride (Dissolved) mg/L	00941	8.5	51.8	33	71
Chromium (Dissolved) ug/L	01030	4	4.6	15	4.0
Cyanide (Total) mg/L	00720	0.005	0.005	0.005	0.005
Iron (Dissolved) ug/L	01046	8278	7600.0	12759.2	21000
Lead (Dissolved) ug/L	01049	1.0	1.0	2.5	1.1
Magnesium (Dissolved) mg/L	00925	66.4	82.2	72.1	101.4
Manganese (Dissolved) ug/L	01056	241.4	105.9	272.9	1200
Mercury (Dissolved) ug/L	71890	0.2	0.2	0.20	0.2
Nitrate (as N, Dissolved) mg/L	00618	0.290	0.14	1.5	0.06
Phenols (Total Recoverable) ug/L	32730	5	5	5	14
Sulfate (Dissolved) mg/L	00946	8.4	65	76	156.6
TDS (180°C; Dissolved) mg/L	70300	692.7	870	787	946.5
TOC (Total) mg/L	00680	11.0	14.2	46.0	26.0
Zinc (Dissolved) ug/L	01090	36.52	22	16	11
<u>PARAMETERS (ug/L)</u>	<u>STORETS</u>	<u>Upper Radnor</u>	<u>Lower Radnor</u>	<u>Organic Soil</u>	<u>Roxana Silt-Robein</u>
<u>UNFILTERED (totals)</u>					
Acenaphthene	34205	2.0	2.0	2.0	2.0
Acenaphthylene	34200	2.0	2.0	2.0	2.0
Acetone	81552	10.0	10.0	10.0	10.0
Acrolein	34210	50.0	50.0	50.0	10.0
Acrylonitrile	34215	50.0	50.0	50.0	50.0
# Alachlor	77825	0.4	0.4	0.4	0.4
# Aldicarb	39053	0.4	0.4	0.4	0.4
@ Aldrin	39330	0.05	0.05	0.05	0.05
Aluminum	01105	454.413	220069	178253	24000
Ammonia (as N) (mg/L)	00610	22.0	17.0	18.0	31.0
Anthracene	34220	2.0	2.0	2.0	2.0
# Antimony	01097	3.0	3.0	3.0	3.0
# Arsenic	01002	598.4	128.7	113.4	11.0

Page 2 of 4

<u>PARAMETERS (ug/L)</u>	<u>STORETS</u>	<u>Upper Radnor</u>	<u>Lower Radnor</u>	<u>Organic Soil</u>	<u>Roxana Silt-Robein</u>
<u>UNFILTERED (totals)</u>					
Aroclor 1016	79683	0.5	0.5	0.5	0.5
Aroclor 1221	79684	0.5	0.5	0.5	1.0
Aroclor 1232	79685	0.5	0.5	0.5	0.5
Aroclor 1242	79686	0.5	0.5	0.5	0.5
Aroclor 1248	79687	0.5	0.5	0.5	0.5
Aroclor 1254	79688	0.5	0.5	0.5	1.0
Aroclor 1260	79689	0.5	0.5	0.5	1.0
# Atrazine	39033	0.2	0.2	0.2	0.2
# Barium	01007	2203.2	1050	541.1	590
# Benzene	34030	1.0	1.0	1.0	1.0
Benzo(a)anthracene	34526	0.13	0.13	0.13	1.0
# Benzo(a)Pyrene	34247	0.2	0.2	0.2	0.2
Benzo(b)fluoranthene	34230	0.18	0.18	0.18	0.18
Benzo(ghi)perylene	34521	0.2	0.2	0.2	0.2
Benzo(k)fluoranthene	34242	0.2	0.2	0.2	0.2
# Beryllium	01012	27.0	15.5	2.6	1.2
BOD (mg/L)	00310	67.0	42.6	45.4	83
# Boron	01022	1198.7	736.2	564.1	620
*Bromobenzene	81555	1.0	1.0	1.0	1.0
*Bromochloromethane	77297	1.0	1.0	1.0	1.0
*Bromodichloromethane	32101	1.0	1.0	1.0	1.0
*Bromoform	32104	1.0	1.0	1.0	1.0
*Bromomethane	34413	2.0	2.0	2.0	2.0
*n-Butylbenzene	77342	1.0	1.0	1.0	1.0
*sec-Butylbenzene	77350	1.0	1.0	1.0	1.0
*tert-Butylbenzene	77353	1.0	1.0	1.0	1.0
# Cadmium	01027	1.0	1.3	1.0	1.0
Calcium (mg/L)	00916	1516.3	774.1	256.3	210
# Carbofuran	81405	1.5	1.5	1.5	1.5
Carbon Disulfide	77041	4.0	8.0	26.0	4.0
# Carbon Tetrachloride	32102	1.0	1.0	1.0	1.0
COD (mg/L)	00335	7.0	36.3	109.5	110
# Chlordane	39350	0.5	0.5	0.5	0.5
# Chloride (mg/L)	00940	7.8	5.7	13.0	29.0
*Chlorobenzene	34301	1.0	1.0	1.0	1.0
*Chloroethane	34311	2.0	2.0	2.0	2.0
*Chloroform	32106	1.0	1.0	1.0	1.0
*Chloromethane	34418	2.0	2.0	2.0	2.0
*o-Chlorotoluene	77275	1.0	1.0	1.0	1.0
*p-Chlorotoluene	77277	1.0	1.0	1.0	1.0
# Chromium	01034	810.2	508.9	345.8	44.0
Chrysene	34320	0.2	0.2	0.2	0.2
*Chlorodibromomethane	32105	1.0	1.0	1.0	1.0
# Cobalt	01037	330.6	158.3	26.0	13.0
# Copper	01042	959.3	324.9	351.1	30.0
p-Cresol	77146	10.0	10.0	10.0	1.0
# Cyanide (mg/L)	00720	0.005	0.005	0.005	0.005
# Dalapon	38432	1.5	1.5	1.5	1.5
@ DDT	39370	0.1	0.1	0.1	0.1
Dibenzo(a,h)anthracene	34556	2.0	2.0	2.0	2.0
*Dibromomethane	77596	1.0	1.0	1.0	1.0
*m-Dichlorobenzene	34566	1.0	1.0	1.0	1.0
*o-Dichlorobenzene	34536	1.0	1.0	1.0	1.0
# p-Dichlorobenzene	34571	1.0	1.0	1.0	1.0
*Dichlorodifluoromethane	34668	2.0	2.0	2.0	2.0

EXHIBIT A

Page 3 of 4

<u>PARAMETERS</u> (ug/L)	<u>STORETS</u>	<u>Upper Radnor</u>	<u>Lower Radnor</u>	<u>Organic Soil</u>	<u>Roxana Silt-Robein</u>
<u>UNFILTERED</u> (totals)					
#*Dichloromethane	34423	7.0	7.0	7.0	7.0
@ Dieldrin	39380	0.1	0.1	0.1	0.1
Diethyl Phthalate	34336	10.0	10.0	10.0	1.0
Dimethyl Phthlate	34341	10.0	10.0	10.0	1.0
Di-N-Butyl Phthlate	39110	10.0	10.0	10.0	1.0
# Dinoseb (DNBP)	81287	0.2	0.2	0.2	0.2
# Endothall	38926	40.0	40.0	40.0	9.0
# Endrin	39390	0.1	0.1	0.1	0.1
# Di(2-Ethylhexyl)Phthalate	39100	22.0	7.6	7.4	1.0
#*Ethylbenzene	78113	1.0	1.0	1.0	1.0
#*Ethylene Dibromide (EDB)	77651	0.05	0.05	0.05	0.05
Fluoranthene	34376	0.2	0.2	0.2	0.2
# Fluoride (mg/L)	00951	0.80	0.60	0.58	0.63
# Heptachlor	39410	0.05	0.05	0.05	0.05
# Heptachlor Epoxide	39420	0.05	0.05	0.05	0.05
*Hexachlorobutadiene	39702	10.0	10.0	10.0	10.0
# Hexachlorocyclopentadiene	34386	10.0	10.0	10.0	1.0
Ideno(1,2,3-cd)pyrene	34403	2.0	2.0	2.0	2.0
Iodomethane	77424	1.0	1.0	1.0	1.0
# Iron	01045	825948	475695	110816	37000
Isophorone	34408	10.0	10.0	10.0	1.0
*Isopropylbenzene	77223	1.0	1.0	1.0	1.0
*p-Isopropyltoluene	77356	1.0	1.0	1.0	1.0
# Lead	01051	910.6	309.7	46.0	16.0
# Lindane	39782	0.05	0.05	0.05	0.05
Magnesium (mg/L)	00927	706.6	1300	125.7	120
# Manganese	01055	13939.0	7858	2013	1300
# Mercury	71900	0.2	0.2	0.2	0.22
# Methoxychlor	39480	0.5	0.5	0.5	0.5
*Naphthalene	34696	10.0	10.0	10.0	5.0
# Nickel	01067	885.6	1400	284	66.0
# Nitrate-Nitrogen (mg/L)	00620	0.02	0.02	0.4	1.4
@ Oil(Hexane-Soluble) (mg/L)	00550	5.0	25.0	19.0	6.0
@ Parathion	39540	0.2	0.2	0.2	0.2
# Pentachlorophenol	39032	0.05	0.05	0.05	0.05
# pH	00400	6.24-7.75	6.09-7.51	6.32-7.48	6.07-8.22
Phenanthrene	34461	2.0	2.0	2.0	2.0
# Phenols	32730	0.005	0.005	0.005	14
# Picloram	39720	0.2	0.2	0.2	0.2
# Polychlorinated Biphenyls	39516	0.5	0.5	0.5	0.5
Potassium (mg/L)	00937	141.7	2300.0	19.8	10.0
*n-Propylbenzene	77224	1.0	1.0	1.0	1.0
Pyrene	34469	0.2	0.2	0.2	0.2
# Selenium	01147	17.9	10.8	2.2	3.2
# Silver	01077	5.0	5.0	5.0	5.0
# Simazine	39055	0.2	0.2	0.2	0.2
Sodium (mg/L)	00929	25.0	7700.0	61.7	120
#*Styrene	77128	1.0	1.0	1.0	1.0
# Sulfate (mg/L)	00945	6.4	6.5	38.2	180.0
TOC (mg/L)	00680	11.0	14.2	46.0	26.0
#*Tetrachloroethylene	34475	1.0	1.0	1.0	1.0
Tetrahydrofuran	81607	20.0	20.0	20.0	10.0
# Thallium	01059	1.7	2.5	1.0	1.0
#*Toluene	34010	1.0	1.0	1.0	1.0
# Toxaphene	39400	1.5	1.5	1.5	0.5

EXHIBIT A

Page 4 of 4

<u>PARAMETERS</u> (ug/L)	<u>STORETS</u>	<u>Upper Radnor</u>	<u>Lower Radnor</u>	<u>Organic Soil</u>	<u>Roxana Silt-Robein</u>
<u>UNFILTERED</u> (totals)					
# Trichloroethylene	39180	1.0	1.0	1.0	1.0
*Trichlorofluoromethane	34488	1.0	1.0	1.0	1.0
Vanadium	01087	1196.74	486.4	75.0	45.0
# Vinyl Chloride	39175	2.0	2.0	2.0	2.0
Vinyl Acetate	77057	5.0	5.0	5.0	5.0
# Xylenes	81551	3.0	3.0	3.0	3.0
*m,p-Xylene	85795	1.0	1.0	1.0	1.0
*o-Xylene	77135	1.0	1.0	1.0	1.0
# Zinc	01092	1808.2	1100	188.7	86.0
*1,1,1,2-Tetrachloroethane	77562	1.0	1.0	1.0	1.0
# 1,1,1-Trichloroethane	34506	1.0	1.0	1.0	1.0
*1,1,2,2-Tetrachloroethane	34516	1.0	1.0	1.0	1.0
##1,1,2-Trichloroethane	34511	1.0	1.0	1.0	1.0
*1,1-Dichloroethane	34496	1.0	1.0	1.0	1.0
# 1,1-Dichloroethylene	34501	1.0	1.0	1.0	1.0
*1,1-Dichloropropene	77168	1.0	1.0	1.0	1.0
*1,2,3-Trichlorobenzene	77613	1.0	1.0	1.0	1.0
*1,2,3-Trichloropropane	77443	1.0	1.0	1.0	1.0
##1,2,4-Trichlorobenzene	34551	1.0	1.0	1.0	1.0
*1,2,4-Trimethylbenzene	77222	1.0	1.0	1.0	1.0
##*1,2-Dibromo-3-Chloropropane	38760	0.05	0.05	0.05	0.05
##*cis-1,2-Dichloroethylene	77093	1.0	1.0	1.0	1.0
##*trans-1,2-Dichloroethylene	34546	1.0	1.0	1.0	1.0
# 1,2-Dichloroethane	34531	1.0	1.0	1.0	1.0
##*1,2-Dichloropropane	34541	1.0	1.0	1.0	1.0
*1,3,5-Trimethylbenzene	77226	1.0	1.0	1.0	1.0
*1,3-Dichloropropane	77173	1.0	1.0	1.0	1.0
*1,3-Dichloropropene	34561	1.0	1.0	1.0	2.0
cis-1,3-Dichloropropene	34704	1.0	1.0	1.0	1.0
trans-1,3-Dichloropropene	34699	1.0	1.0	1.0	1.0
trans-1,4-Dichloro-2-Butene	49263	1.0	1.0	1.0	1.0
*2,2-Dichloropropane	77170	1.0	1.0	1.0	1.0
# 2,4,5-TP (Silvex)	39760	0.05	0.05	0.05	0.05
# 2,4-D	39730	0.1	0.1	0.1	0.1
2-Butanone	81595	5.0	5.0	5.0	5.0
2-Hexanone	77103	5.0	5.0	5.0	5.0
4-Methyl-2-Pentanone	78133	5.0	5.0	5.0	5.0

NOTE:

- i. The preceding list of parameters (G2) includes all those found in Attachment 1 to Appendix C to LPC-PA2. The 51 constituents from 40 CFR 141.40 and the parameters from 35 Ill. Adm. Code 620.410 and the parameters from 35 Ill. Adm. Code 302, designated with (*), (#) and (@) respectively are required to be monitored annually and may not be deleted.
- ii. All parameters with the "(Dissolved)" label to the right shall be determined using groundwater samples which have been filtered through a 0.45 micron filter. All other parameters shall be determined from unfiltered samples.
- iii. Maximum allowable predicted concentrations (MAPCs) and applicable groundwater quality standards (AGQS) are given in ug/L except as otherwise noted. Also, the monitoring results should be reported in ug/L units unless otherwise indicated.
- v. The intrawell AGQS value for dissolved boron at well G16M is 1287.5 ug/l.