

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

RECEIVED
CLERK'S OFFICE

JUN 18 2007

STATE OF ILLINOIS
Pollution Control Board

PEOPLE OF THE STATE OF ILLINOIS, ex
rel. LISA MADIGAN, Attorney General of the
State of Illinois,

Plaintiff,

v.

COMMUNITY LANDFILL CO., an Illinois
Corporation, and the CITY OF MORRIS, an
Illinois Municipal Corporation,

Defendants.

PCB No. 03-191
(Enforcement-Land)

CITY OF MORRIS' MOTION TO FILE REPLY BRIEF

NOW COMES the Defendant, CITY OF MORRIS, an Illinois Municipal Corporation, by and through its attorneys, HINSHAW & CULBERTSON LLP, and files its Motion to File Reply Brief, and in support thereof states as follows:

1. On May 24, 2007, the City of Morris filed a Motion to Reconsider the Pollution Control Board's Order of May 17, 2007.
2. On May 30, 2007, a copy of the State's Response Brief was faxed to Mr. Helsten, however, it was not received by him until his return from a family funeral the morning of June 1, 2007. Further, the date the hard copy was received was June 1, 2007. That Response contains several misleading statements concerning the environmental condition of the facility at issue.
3. Accordingly, the City of Morris, an Illinois Municipal Corporation, requests leave to file the attached Reply Brief, instant.

WHEREFORE, the City of Morris requests leave to file the attached Reply Brief instant.

Dated: June 15, 2007

Respectfully submitted,

CITY OF MORRIS, an Illinois Municipal
Corporation, Defendant

By:  HINSHAW & CULBERTSON LLP

Charles F. Helsten
One of Its Attorneys

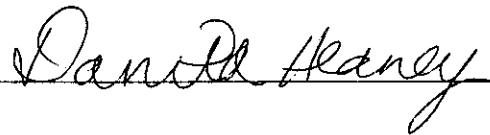
Charles F. Helsten
Hinshaw & Culbertson LLP
100 Park Avenue
P.O. Box 1389
Rockford, IL 61105-1389
Phone: 815-490-4900
Fax: 815-490-4901

AFFIDAVIT OF SERVICE

The undersigned, pursuant to the provisions of Section 1-109 of the Illinois Code of Civil Procedure, hereby under penalty of perjury under the laws of the United States of America, certifies that on June 15, 2007, she caused to be served a copy of the foregoing upon:

Mr. Christopher Grant Assistant Attorney General Environmental Bureau 100 W. Randolph St., 11th Fl. Chicago, IL 60601	Mark LaRose Clarissa Grayson LaRose & Bosco, Ltd. 200 N. LaSalle, Suite 2810 Chicago, IL 60601
Ms. Dorothy Gunn, Clerk Pollution Control Board 100 W. Randolph, Suite 11-500 Chicago, IL 60601	Bradley Halloran Hearing Officer Pollution Control Board 100 W. Randolph, Suite 11 Chicago, IL 60601
Mr. Scott Belt 105 East Main Street Suite 206 Morris, Illinois 60450	

A copy of the same was enclosed in an envelope in the United States mail at Rockford, Illinois, proper postage prepaid, before the hour of 5:00 p.m., addressed as above.



HINSHAW & CULBERTSON
100 Park Avenue
P.O. Box 1389
Rockford, IL 61105-1389
(815) 490-4900

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

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JUN 18 2007

STATE OF ILLINOIS
Pollution Control Board

PEOPLE OF THE STATE OF ILLINOIS, ex
rel. LISA MADIGAN, Attorney General of the
State of Illinois,

Plaintiff,

v.

COMMUNITY LANDFILL CO., an Illinois
Corporation, and the CITY OF MORRIS, an
Illinois Municipal Corporation,

Defendants.

PCB No. 03-191
(Enforcement-Land)

AFFIDAVIT OF ATTORNEY CHARLES F. HELSTEN

I, ATTORNEY CHARLES F. HELSTEN, the undersigned being first duly sworn on oath
depose and state as follows:

1. I am the attorney primarily responsible for representing the City of Morris, an
Illinois Municipal corporation, regarding the above referenced Illinois Pollution Control Board
action.

2. On May 30, 2007, I was out of the office attending a funeral of a relative and I did
not return to the office until June 1, 2007. June 1, 2007 is the first time that I saw a telefax from
the State of Illinois containing its Response to the Motion to Reconsider filed by the City of
Morris.

3. On that same date, June 1, 2007, I received a hard copy of the State of Illinois'
Response Brief.

4. Accordingly, the attorneys for the City of Morris have only had the Response
Brief in its possession for fourteen (14) days and it has diligently drafted its Motion to File Reply
Brief.

5. Affiant further sayeth not.

Dated: June 15, 2007

Respectfully submitted,

CITY OF MORRIS, an Illinois Municipal
Corporation, Defendant

By:  HINSHAW & CULBERTSON LLP

Charles F. Helsten
One of Its Attorneys

Charles F. Helsten
Hinshaw & Culbertson LLP
100 Park Avenue
P.O. Box 1389
Rockford, IL 61105-1389
Phone: 815-490-4900
Fax: 815-490-4901

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

PEOPLE OF THE STATE OF ILLINOIS, ex
rel. LISA MADIGAN, Attorney General of the
State of Illinois,

Plaintiff,

v.

COMMUNITY LANDFILL CO., an Illinois
Corporation, and the CITY OF MORRIS, an
Illinois Municipal Corporation,

Defendants.

RECEIVED
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JUN 18 2007

STATE OF ILLINOIS
Pollution Control Board
PCB No. 03-19
(Enforcement-Land)

CITY'S REPLY TO THE PEOPLE OF THE STATE OF ILLINOIS'
RESPONSE TO MOTION TO RECONSIDER

NOW COMES the Defendant, CITY OF MORRIS, an Illinois Municipal Corporation, by and through its attorneys, HINSHAW & CULBERTSON LLP, and files its Reply to the Response to Motion to Reconsider, and in support thereof states as follows:

1. On May 31, 2007, the State of Illinois filed its Response to the City of Morris' Motion to Reconsider and in that response made several misleading statements concerning the environmental condition at the landfill site. Specifically, the City of Morris filed a Motion to Set Matter for Hearing which was granted by the Court and a Motion to Reconsider was filed by the City of Morris.

2. It is well documented that an important necessary witness to these proceedings is unavailable due to a medical condition. Nonetheless, the State of Illinois has pushed for a hearing without the necessary witness on the grounds that the environmental condition of the facility required the matter to be heard. The State of Illinois has taken the erroneous position that the landfill gas condition at the facility is deteriorating when the evidence is to the exact contrary. Specifically, in its Response the State mentioned that a January 3, 2006 gas probe test showed an elevated methane level. The government failed to inform the Court that all of the 2007 gas probe monitoring reports have been well below the 50% lower explosive limit (LEL) for methane gas. (See studies attached hereto as Exhibits A-D).

3. Furthermore, the State references the certain surface scan testing on January 10, 2007 identified two areas of the landfill with elevated methane emissions and erroneously suggested to the Court that somehow this is a violation. However, the February 1, 2007 report, which is attached hereto as Exhibit E, explicitly provides that "in accordance with 35 Ill.Admin.Code 220.240(c)(4), Shaw personnel resampled these exceedance areas on January 19, 2007. The resampling of the two previous exceedance areas did not measure organic vapor concentrations greater than 500 parts per million (ppm)". Furthermore, the resampling on February 10, 2007 again showed levels less than 500 ppm. (Exhibit F). Accordingly, there is no violation as the exceedance was not confirmed by a repeat scan. More importantly, the most recent gas probe data shows that the landfill is actually improving as far as methane gas is concerned and there is certainly no need for an expedited hearing on this matter.

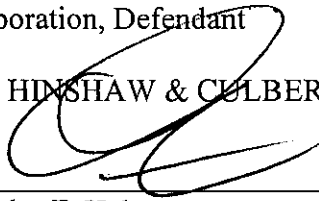
WHEREFORE, the City of Morris respectfully requests that the Board reconsider its previous order and deny the State's new motion to set matter for hearing or alternatively for severance claim.

Dated: June 15, 2007

Respectfully submitted,

CITY OF MORRIS, an Illinois Municipal
Corporation, Defendant

By: HINSHAW & CULBERTSON LLP



Charles F. Helsten
One of Its Attorneys

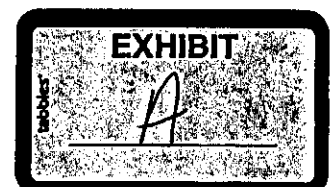
Charles F. Helsten
Hinshaw & Culbertson LLP
100 Park Avenue
P.O. Box 1389
Rockford, IL 61105-1389
Phone: 815-490-4900
Fax: 815-490-4901

**Morris Community Landfill
Gas Probe Monitoring**

Sample Date: 01/02/07

Technician: Darion Kidwell

Probe ID	Pressure	CH ₄		CO ₂ (% by vol.)	O ₂ (% by vol.)	Balance (% by vol.)	Inspection of Gas Probe
		(% by vol.)	(% LEL)				
X101	0.0	0.0	0.0	0.6	17.2	82.2	
X102	0.0	0.0	0.0	0.0	18.5	81.5	
X103	0.0	0.0	0.0	0.4	16.5	83.1	
X104	0.0	0.0	0.0	0.2	16.1	83.7	
X105	0.0	0.0	0.0	0.0	18.4	81.6	
X106	0.0	0.0	0.0	0.0	18.5	81.5	
X107	0.0	0.0	0.0	0.0	18.5	81.5	
X108	0.0	0.0	0.0	0.0	18.4	81.6	
X109	0.0	0.0	0.0	0.0	18.5	81.5	
X110	0.0	0.0	0.0	0.0	18.5	81.5	
X111	0.0	0.0	0.0	0.0	18.5	81.5	
X112	0.0	0.0	0.0	0.0	18.5	81.5	
X113	0.0	0.0	0.0	0.0	18.5	81.5	
X114	0.0	0.0	0.0	0.0	18.5	81.5	
X115	0.0	0.0	0.0	0.0	18.6	81.4	
X116	0.0	0.5	10.0	2.5	13.9	83.1	
X117	0.0	0.0	0.0	1.8	16.9	81.3	
X118	0.4	0.0	0.0	4.5	15.7	79.8	
X119	0.0	0.0	0.0	1.8	16.8	81.4	
X120	0.0	0.0	0.0	2.0	16.8	81.2	
X121	0.0	0.0	0.0	1.7	16.2	82.1	
X122	0.0	0.0	0.0	0.0	18.2	81.8	
X123	0.0	0.0	0.0	0.0	18.4	81.6	
X124	0.0	0.0	0.0	0.0	18.5	81.5	
X125	0.0	0.0	0.0	5.7	15.0	79.3	
X126	0.0	0.0	0.0	0.0	18.5	81.5	
X127	0.0	0.0	0.0	0.0	18.5	81.5	
X128	0.0	0.0	0.0	0.0	18.5	81.5	Needs weep hole



Morris Community Landfill
Gas Probe Monitoring

Amblents	CH₄	Location
1	0.0	Southeast corner of partial B by X114
2	0.0	Southwest corner of partial B by X118
3	0.0	Northwest corner of partial B by X121
4	0.0	North side of Partial B by X123
5	0.0	North side of Partial B by X127
6	0.0	Northeast corner of partial B by X112
7	0.0	Southwest corner of partial A by X101
8	0.0	Southwest corner of partial A by X103
9	0.0	Northeast corner of partial A by X108
10	0.0	Northside of Partial A by X109
11	0.0	Northside of Partial A by X110
12	0.0	Northwest corner of partial A by X111

Notes:

Gas probes are monitored monthly.

Wind 5-15 mph out of the South

Partly cloudy and 35°F

**Morris Community Landfill
Gas Probe Monitoring**

Sample Date: 02/05/07

Technician: Darion Kidwell

Probe ID	Pressure	CH ₄		CO ₂ (% by vol.)	O ₂ (% by vol.)	Balance (% by vol.)	Inspection of Gas Probe
		(% by vol.)	(% LEL)				
X101	0.0	0.0	0.0	0.2	15.4	84.4	Yes
X102	0.0	0.0	0.0	0.0	15.7	84.3	Yes
X103	0.0	0.0	0.0	0.0	15.4	84.6	Yes
X104	0.0	0.0	0.0	0.0	15.2	84.8	Yes
X105	0.0	0.0	0.0	0.0	15.6	84.4	Yes
X106	0.0	0.0	0.0	0.0	15.6	84.4	Yes
X107	0.0	0.0	0.0	0.0	15.6	84.4	Yes
X108	0.0	0.0	0.0	0.0	15.5	84.5	Yes
X109	0.0	0.0	0.0	0.0	15.7	84.3	Yes
X110	0.0	0.0	0.0	0.0	15.7	84.3	Yes
X111	0.0	0.0	0.0	0.0	15.6	84.4	Yes
X112	0.0	0.0	0.0	0.0	15.6	84.4	Yes
X113	0.0	0.0	0.0	0.0	15.7	84.3	Yes
X114	0.0	0.0	0.0	0.0	15.7	84.3	Yes
X115	0.0	0.0	0.0	0.0	15.7	84.3	Yes
X116	0.0	0.7	14.0	2.2	13.7	83.4	Yes
X117	0.0	0.0	0.0	1.2	15.4	83.4	Yes
X118	0.4	0.0	0.0	1.5	15.2	83.3	Yes
X119	0.0	0.0	0.0	0.7	15.5	83.8	Yes
X120	0.0	0.0	0.0	0.3	15.5	84.2	Yes
X121	0.0	0.0	0.0	0.3	15.6	84.1	Yes
X122	0.0	0.0	0.0	0.0	15.7	84.3	Yes
X123	0.0	0.0	0.0	0.0	15.7	84.3	Yes
X124	0.0	0.0	0.0	0.0	15.6	84.4	Yes
X125	0.0	0.0	0.0	1.0	15.0	84.0	Yes
X126	0.0	0.0	0.0	0.0	15.6	84.4	Yes
X127	0.0	0.0	0.0	0.0	15.6	84.4	Yes
X128	0.0	0.0	0.0	0.0	15.6	84.4	Needs weep hole



Morris Community Landfill
Gas Probe Monitoring

Ambients	CH ₄	Location
1	0.0	Southeast corner of partial B by X114
2	0.0	Southwest corner of partial B by X118
3	0.0	Northwest corner of partial B by X121
4	0.0	North side of Partial B by X123
5	0.0	North side of Partial B by X127
6	0.0	Northeast corner of partial B by X112
7	0.0	Southwest corner of partial A by X101
8	0.0	Southwest corner of partial A by X103
9	0.0	Northeast corner of partial A by X108
10	0.0	Northside of Partial A by X109
11	0.0	Northside of Partial A by X110
12	0.0	Northwest corner of partial A by X111

Notes:

Gas probes are monitored monthly.
Wind 5-15 mph out of the South
Partly cloudy and 35°F



Shaw® Shaw Environmental, Inc.

999 Remington Blvd., Suite A, Bolingbrook, Illinois 60440

Tel. (630) 771-9200 • Fax (630) 771-9250

TRANSMITTAL

Project/Task No 112005.00050000

TO: Ms. Pam Thomas DATE: April 24, 2007
Shaw E&I
1607 East Main Street
St. Charles, Illinois 60174

RE: Morris Community Landfill - Landfill Gas April 2007

WE ARE SENDING:

QUANTITY	DESCRIPTION
<u>1 set</u>	<u>Morris Community Landfill - Landfill Gas Report, April 2007</u>

For Your:

☐ USE
☐ APPROVAL
☐ REVIEW/COMMENTS
☐ INFORMATION
☐ OTHER

Sent By:

☒ REGULAR MAIL
☐ UPS - STD overnight
☐ UPS - Priority Overnight
☐ COURIER
☐ OTHER

COMMENTS: _____

CC:

BY: Heather M. Powell-Olson

EXHIBIT

C



Shaw® Shaw Environmental & Infrastructure, Inc.

Shaw Environmental & Infrastructure, Inc.

999 Remington Boulevard, Unit A
Bolingbrook, IL 60440
630.771.9200
Fax: 630.771.9250

April 24, 2007
Project 112005

Mayor Richard Kopczick
City of Morris
320 Wauponsee Street
Morris, Illinois 60450

Re: Morris Community Landfill
0630600001 – Grundy County
Landfill Gas Monitoring Report – April, 2007

Dear Mayor Kopczick:

Please find enclosed the April, 2007 Landfill Gas Monitoring Summary Report for the City of Morris Landfill, in Morris, Illinois. Please note that there were no gas monitoring probes that exhibited methane concentrations greater than 50 % of the lower explosive limit (LEL).

If you have any questions or comments regarding this report, please contact our office at your convenience.

Sincerely,

Shaw Environmental, Inc.

Heather M. Powell-Olson
Senior Project Manager

cc: Chuck Helsten, Hinshaw & Culbertson
Guy Christenson, Chamlin & Associates
Jim Pelnarsh, Morris Community Landfill
Pam Thomas, Shaw Environmental

**Morris Community Landfill
Gas Probe Monitoring**

Sample Date: 4/24/07

Technician: Shane Diebel

Probe ID	Pressure	CH ₄		CO ₂ (% by vol.)	O ₂ (% by vol.)	Balance (% by vol.)	Inspection of Gas Probe
		(% by vol.)	(% LEL)				
X101	0.0	0.0	0.0	0.0	20.2	79.8	Yes
X102	0.0	0.0	0.0	0.0	20.2	79.8	Yes
X103	0.0	0.0	0.0	1.9	18.1	80.0	Yes
X104	0.0	0.0	0.0	0.7	19.3	80.0	Yes
X105	0.0	0.0	0.0	0.0	20.0	80.0	Yes
X106	0.0	0.0	0.0	0.0	19.8	80.2	Yes
X107	0.0	0.0	0.0	0.0	19.9	80.1	Yes
X108	0.0	0.0	0.0	0.0	19.8	80.2	Yes
X109	0.0	0.0	0.0	0.2	18.3	81.5	Yes
X110	0.0	0.0	0.0	0.0	19.9	80.1	No Connector Port
X111	0.0	0.0	0.0	0.0	20.0	80.0	Yes
X112	0.0	0.0	0.0	0.0	20.0	80.0	Hinge is Bent
X113	0.0	0.0	0.0	1.0	17.2	81.8	Yes
X114	0.0	0.0	0.0	2.2	9.8	88.0	Yes
X115	0.0	0.0	0.0	0.0	20.0	80.0	Yes
X116	0.0	0.0	0.0	5.6	11.7	82.7	Yes
X117	0.0	0.0	0.0	0.0	19.9	80.1	Yes
X118	0.0	0.0	0.0	1.7	18.2	80.1	Yes
X119	0.0	0.0	0.0	0.2	19.6	80.2	Yes
X120	0.0	0.0	0.0	3.4	16.8	79.8	Yes
X121	0.0	0.0	0.0	3.0	15.3	81.7	Yes
X122	0.0	0.0	0.0	0.0	19.7	80.3	Yes
X123	0.0	0.0	0.0	1.4	18.4	80.2	Yes
X124	0.0	0.0	0.0	0.0	20.0	80.0	Yes
X125	0.1	0.0	0.0	5.8	14.8	79.4	Yes
X126	0.0	0.0	0.0	0.0	19.9	80.1	Yes
X127	0.0	0.0	0.0	0.0	20.0	80.0	Yes
X128	0.0	0.0	0.0	5.1	13.9	81.0	Needs weep hole

Morris Community Landfill
Gas Probe Monitoring

Ambients	CH ₄	Location
1	0.0	Northeast corner of Parcel B by X112 (upwind)
2	0.0	Southeast corner of Parcel B by X114 (upwind)
3	0.0	South face of Parcel B by X119 (downwind)
4	0.0	Southwest corner of Parcel B by X122 (downwind)
5	0.0	Northwest corner of Parcel B by X124 (downwind)
6	0.0	Northwest face of Parcel B by X126 (downwind)
7	0.0	East face of Parcel A between X105 and X106 (upwind)
8	0.0	Northeast corner of Parcel A by X108 (upwind)
9	0.0	Northwest corner of Parcel A by X111 (downwind)
10	0.0	West face of Parcel A south of X111 by red Santa House (downwind)
11	0.0	West face of Parcel A @ 150 ft south of red Santa House (downwind)
12	0.0	Southwest corner of Parcel A (downwind)

Notes:

Gas probes are monitored monthly.

Wind 0 - 5 mph out of the East

Partly cloudy and 55°F

**Morris Community Landfill
Gas Probe Monitoring**

Sample Date: 4/24/07

Technician: Shane Diebel

Probe ID	Pressure	CH ₄		CO ₂ (% by vol.)	O ₂ (% by vol.)	Balance (% by vol.)	Inspection of Gas Probe
		(% by vol.)	(% LEL)				
X101	0.0	0.0	0.0	0.0	20.2	79.8	Yes
X102	0.0	0.0	0.0	0.0	20.2	79.8	Yes
X103	0.0	0.0	0.0	1.9	18.1	80.0	Yes
X104	0.0	0.0	0.0	0.7	19.3	80.0	Yes
X105	0.0	0.0	0.0	0.0	20.0	80.0	Yes
X106	0.0	0.0	0.0	0.0	19.8	80.2	Yes
X107	0.0	0.0	0.0	0.0	19.9	80.1	Yes
X108	0.0	0.0	0.0	0.0	19.8	80.2	Yes
X109	0.0	0.0	0.0	0.2	18.3	81.5	Yes
X110	0.0	0.0	0.0	0.0	19.9	80.1	No Connector Port
X111	0.0	0.0	0.0	0.0	20.0	80.0	Yes
X112	0.0	0.0	0.0	0.0	20.0	80.0	Hinge is Bent
X113	0.0	0.0	0.0	1.0	17.2	81.8	Yes
X114	0.0	0.0	0.0	2.2	9.8	88.0	Yes
X115	0.0	0.0	0.0	0.0	20.0	80.0	Yes
X116	0.0	0.0	0.0	5.6	11.7	82.7	Yes
X117	0.0	0.0	0.0	0.0	19.9	80.1	Yes
X118	0.0	0.0	0.0	1.7	18.2	80.1	Yes
X119	0.0	0.0	0.0	0.2	19.6	80.2	Yes
X120	0.0	0.0	0.0	3.4	16.8	79.8	Yes
X121	0.0	0.0	0.0	3.0	15.3	81.7	Yes
X122	0.0	0.0	0.0	0.0	19.7	80.3	Yes
X123	0.0	0.0	0.0	1.4	18.4	80.2	Yes
X124	0.0	0.0	0.0	0.0	20.0	80.0	Yes
X125	0.1	0.0	0.0	5.8	14.8	79.4	Yes
X126	0.0	0.0	0.0	0.0	19.9	80.1	Yes
X127	0.0	0.0	0.0	0.0	20.0	80.0	Yes
X128	0.0	0.0	0.0	5.1	13.9	81.0	Needs weep hole

Morris Community Landfill
Gas Probe Monitoring

Ambients	CH ₄	Location
1	0.0	Northeast corner of Parcel B by X112 (upwind)
2	0.0	Southeast corner of Parcel B by X114 (upwind)
3	0.0	South face of Parcel B by X119 (downwind)
4	0.0	Southwest corner of Parcel B by X122 (downwind)
5	0.0	Northwest corner of Parcel B by X124 (downwind)
6	0.0	Northwest face of Parcel B by X126 (downwind)
7	0.0	East face of Parcel A between X105 and X106 (upwind)
8	0.0	Northeast corner of Parcel A by X108 (upwind)
9	0.0	Northwest corner of Parcel A by X111 (downwind)
10	0.0	West face of Parcel A south of X111 by red Santa House (downwind)
11	0.0	West face of Parcel A @ 150 ft south of red Santa House (downwind)
12	0.0	Southwest corner of Parcel A (downwind)

Notes:

Gas probes are monitored monthly.

Wind 0 - 5 mph out of the East

Partly cloudy and 55°F



Shaw Environmental & Infrastructure, Inc.

Shaw Environmental & Infrastructure, Inc.

999 Remington Boulevard, Unit A
Bolingbrook, IL 60440
630.771.9200
Fax: 630.771.9250

May 30, 2007
Project 112005

Mayor Richard Kopczick
City of Morris
320 Wauponsee Street
Morris, Illinois 60450

Re: Morris Community Landfill
0630600001 -- Grundy County
Landfill Gas Monitoring Report -- May, 2007

Dear Mayor Kopczick:

Please find enclosed the May, 2007 Landfill Gas Monitoring Summary Report for the City of Morris Landfill, in Morris, Illinois. Please note that there were no gas monitoring probes that exhibited methane concentrations greater than 50 % of the lower explosive limit (LEL).

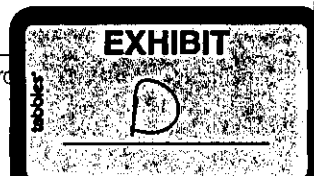
If you have any questions or comments regarding this report, please contact our office at your convenience.

Sincerely,

Shaw Environmental, Inc.

Heather M. Powell-Olson
Senior Project Manager

cc: Chuck Helsten, Hinshaw & Culbertson
Guy Christenson, Chamlin & Associates
Jim Pelnarsh, Morris Community Landfill
Pam Thomas, Shaw Environmental



Morris Community Landfill
Gas Probe Monitoring

Sample Date: 5/29/07
 Technician: D. Kidwell

Probe ID	Pressure	CH ₄		CO ₂ (% by vol.)	O ₂ (% by vol.)	Balance (% by vol.)	Inspection of Gas Probe
		(% by vol.)	(% LEL)				
X101	0.0	0.3	6.0	0.3	17.9	81.5	Yes
X102	0.0	0.0	0.0	4.9	12.5	82.6	Yes
X103	0.0	0.0	0.0	0.0	19.0	81.0	Yes
X104	0.0	0.0	0.0	2.6	15.7	81.7	Yes
X105	0.0	0.0	0.0	1.1	15.5	83.4	Yes
X106	0.0	0.0	0.0	0.0	18.6	81.4	Yes
X107	0.0	0.0	0.0	0.0	19.0	81.0	Yes
X108	0.0	0.0	0.0	0.0	19.1	80.9	Yes
X109	0.0	0.0	0.0	0.0	18.9	81.1	Yes
X110	0.0	0.0	0.0	0.0	19.1	80.9	No Connector Port
X111	0.0	0.0	0.0	0.0	19.1	80.9	Yes
X112	0.0	0.0	0.0	3.1	13.3	83.6	Hinge is Bent
X113	0.0	0.0	0.0	4.3	14.7	81.0	Yes
X114	0.0	0.0	0.0	1.2	14.5	84.3	Yes
X115	0.0	0.0	0.0	4.0	12.2	83.8	Yes
X116	0.0	0.0	0.0	9.5	8.8	81.7	Yes
X117	0.0	0.0	0.0	13.2	0.8	86.0	Yes
X118	0.0	0.0	0.0	4.0	14.6	81.4	Yes
X119	0.0	0.0	0.0	2.6	14.5	82.9	Yes
X120	0.0	0.0	0.0	8.6	11.8	79.6	Yes
X121	0.0	0.0	0.0	4.3	15.3	80.4	Yes
X122	0.0	0.0	0.0	4.4	14.8	80.8	Yes
X123	0.0	0.0	0.0	0.0	19.5	80.5	Yes
X124	0.0	0.0	0.0	8.0	10.8	81.2	Yes
X125	0.0	0.0	0.0	9.1	12.1	78.8	Yes
X126	0.0	0.0	0.0	0.0	19.3	80.7	Yes
X127	0.0	0.0	0.0	0.0	19.0	81.0	Yes
X128	0.0	0.0	0.0	7.9	10.2	81.9	Needs weep hole

Morris Community Landfill
Gas Probe Monitoring

Ambients	CH ₄	Location
1	0.0	Southeast corner of Parcel B by X114
2	0.0	Southwest corner of Parcel B by X118
3	0.0	Northwest corner of Parcel B by X121
4	0.0	North side of Parcel B by X123
5	0.0	North side of Parcel B by X127
6	0.0	Northeast corner of Parcel B by X112
7	0.0	Southwest corner of Parcel A by X101
8	0.0	Southeast corner of Parcel A by X103
9	0.0	Northeast corner of Parcel A by X108
10	0.0	North side of Parcel A by X109
11	0.0	North side of Parcel A by X 110
12	0.0	Northwest corner of Parcel A by X 111

Notes:

Gas probes are monitored monthly.
 Wind 0 - 5 mph out of the South
 Partly cloudy and 80°F

February 1, 2007

Illinois Environmental Protection Agency
Bureau of Air
10212 North Grand Avenue East
P.O. Box 19276
Springfield, IL 62794-9276

To whom it may concern,

At the request of the City of Morris, Shaw Environmental, Inc. (Shaw) has performed surface emission sampling of landfill gas (LFG) at the Community Landfill - Parcel B in accordance with 35 Ill. Adm. Code 220.240 (c) and (d). This report summarizes the results of that effect.

Shaw personnel performed the surface emission sampling on January 10, 2007. Shaw personnel utilized standard NSPS sampling techniques (in accordance with section 4.3.1 of Method 21 of Appendix a, 40 CFR 60) which included the use of a flame ionization detector (Mini-RAE Micro FID). The FID continuously collects air samples and concurrently measures for organic vapor concentration as it is moved along a transverse.

Prior to sampling at the landfill, Shaw personnel established representative background concentration by moving the FID upwind and downwind outside of the landfill a distance of 100 feet from the perimeter wells. Shaw personnel then collected continuous air samples along the entire perimeter of the landfill and along a pattern that traverses the landfill at 30-meter (approximately 100 foot) intervals as shown as a red line on Figure 1. Samples were taken within approximately 4 inches of the ground. Based on the continuous surface testing, two areas of the landfill detected organic vapor concentrations greater than 500 ppm. Please refer to Figure 1 for the location of these areas.

In accordance with 35 Ill. Adm. Code 220.240 (c)(4), Shaw personnel resampled these exceedance areas on January 19, 2007. The resampling of the two previous exceedance areas (Figure 2) did not measure organic vapor concentrations greater than 500 ppm. In accordance with the applicable regulations, Shaw personnel will resample the exceedance areas within one month of the initial sampling event.

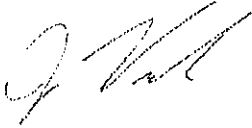
Should you have any questions on this report, please contact me at (630) 762-1400.

Bureau of Air
Illinois Environmental Protection Agency

February 1, 2007
Page 2 of 2

Sincerely,

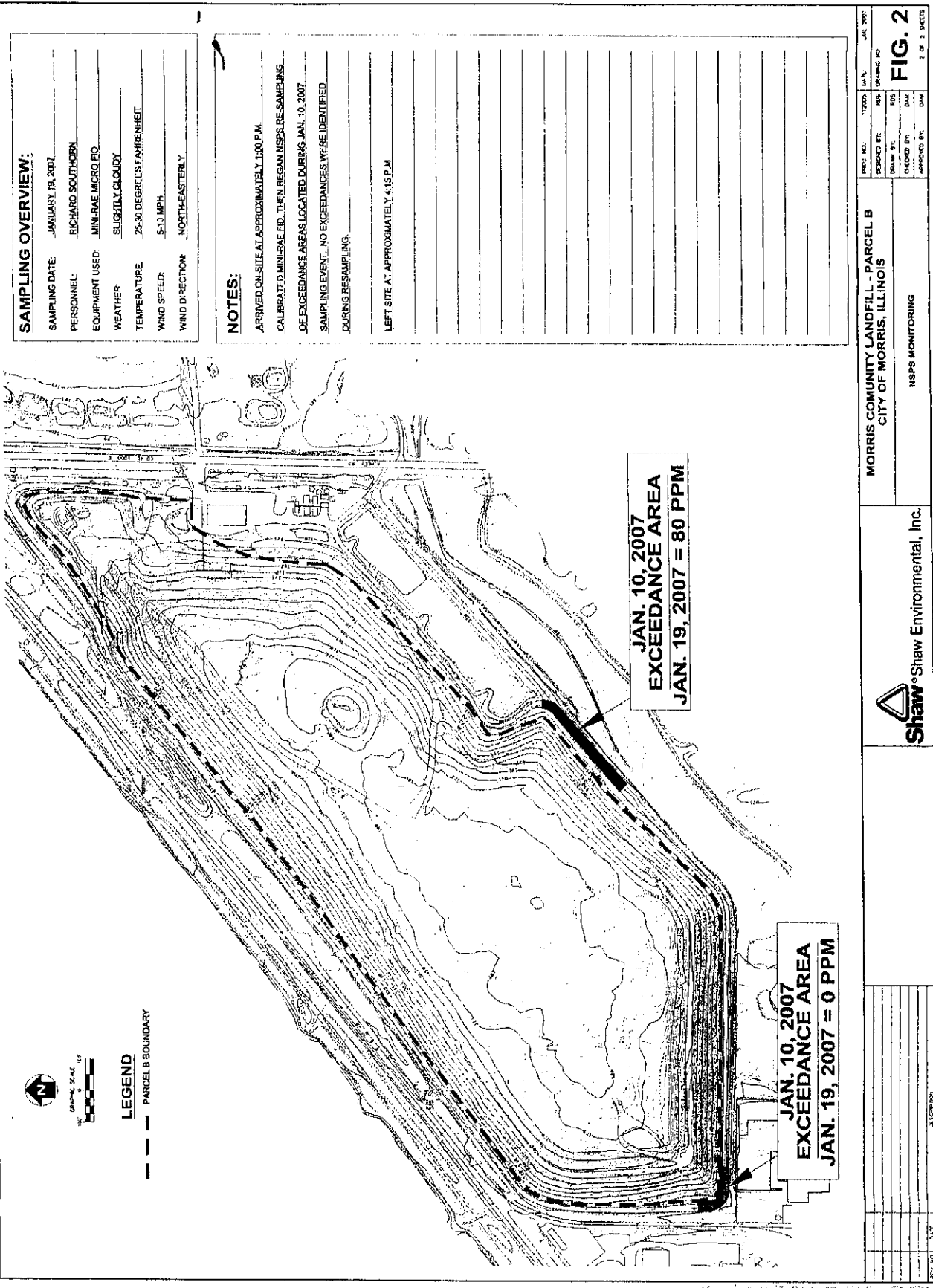
Shaw Environmental, Inc.

A handwritten signature in black ink, appearing to read 'J Varsho', is positioned above the printed name.

Jesse Varsho, P.E., P.G.
Geological Engineer

cc: Ms. Maureen Wozniak - IEPA Division of Legal Counsel
Mr. Christopher Grant - Attorney General
Mayor Richard Kopczick - City of Morris
Chuck Helsten - Hinshaw & Culberston LLP

FIGURES



SAMPLING OVERVIEW:

SAMPLING DATE: JANUARY 19, 2007
PERSONNEL: RICHARD SOUTHOORN
EQUIPMENT USED: MINI-RAE MICRO PID
WEATHER: SLIGHTLY CLOUDY
TEMPERATURE: 25-30 DEGREES FAHRENHEIT
WIND SPEED: 5-10 MPH
WIND DIRECTION: NORTH-EASTERN Y

NOTES:

ARRIVED ON-SITE AT APPROXIMATELY 1:00 P.M.
CALIBRATED MINI-RAE PID, THEN BEGAN NSPS RESAMPLING
OF EXCEEDANCE AREAS LOCATED DURING JAN. 10, 2007
SAMPLING EVENT. NO EXCEEDANCES WERE IDENTIFIED
DURING RESAMPLING.
LEFT SITE AT APPROXIMATELY 4:15 P.M.

REV. NO.		DATE	BY	FIG. 2
1		1/19/07	RS	2 OF 2 SHEETS
MORRIS COMMUNITY LANDFILL - PARCEL B CITY OF MORRIS, ILLINOIS NSPS MONITORING				
DESIGNED BY		DATE	BY	
CHECKED BY		DATE	BY	
APPROVED BY		DATE	BY	



Shaw-Shaw Environmental, Inc.

February 21, 2007

Illinois Environmental Protection Agency
Bureau of Air
10212 North Grand Avenue East
P.O. Box 19276
Springfield, IL 62794-9276

To whom it may concern,

At the request of the City of Morris, Shaw Environmental, Inc. (Shaw) has performed surface emission sampling of landfill gas (LFG) at the Community Landfill - Parcel B in accordance with 35 Ill. Adm. Code 220.240 (c) and (d). This letter is intended to supplement Shaw's previous report, dated February 1, 2007. This report summarizes the results of the resampling area of previous identified exceedance areas.

On January 10, 2007, Shaw personnel performed surface emission testing and identified two areas that had measurements greater than 500 ppm for organic vapor concentrations. On January 19, 2007, Shaw personnel resampled these exceedance areas and did not measure organic vapor concentrations above 500 ppm. In accordance with the applicable regulations, Shaw personnel performed the second resampling event on February 10, 2007 (within 1 month of the initial sampling event). The resampling of the two previous exceedance areas on February 10, 2007 (Figure 1) did not measure organic vapor concentrations greater than 500 ppm.

Should you have any questions on this report, please contact me at (630) 762-1400.

Sincerely,

Shaw Environmental, Inc.



Jesse Varsho, P.E., P.G.
Geological Engineer

cc: Ms. Maurren Wozniak - IEPA Division of Legal Counsel
Mr. Christopher Grant - Attorney General
Mayor Richard Kopczick - City of Morris
Chuck Helsten - Hinshaw & Culberston LLP

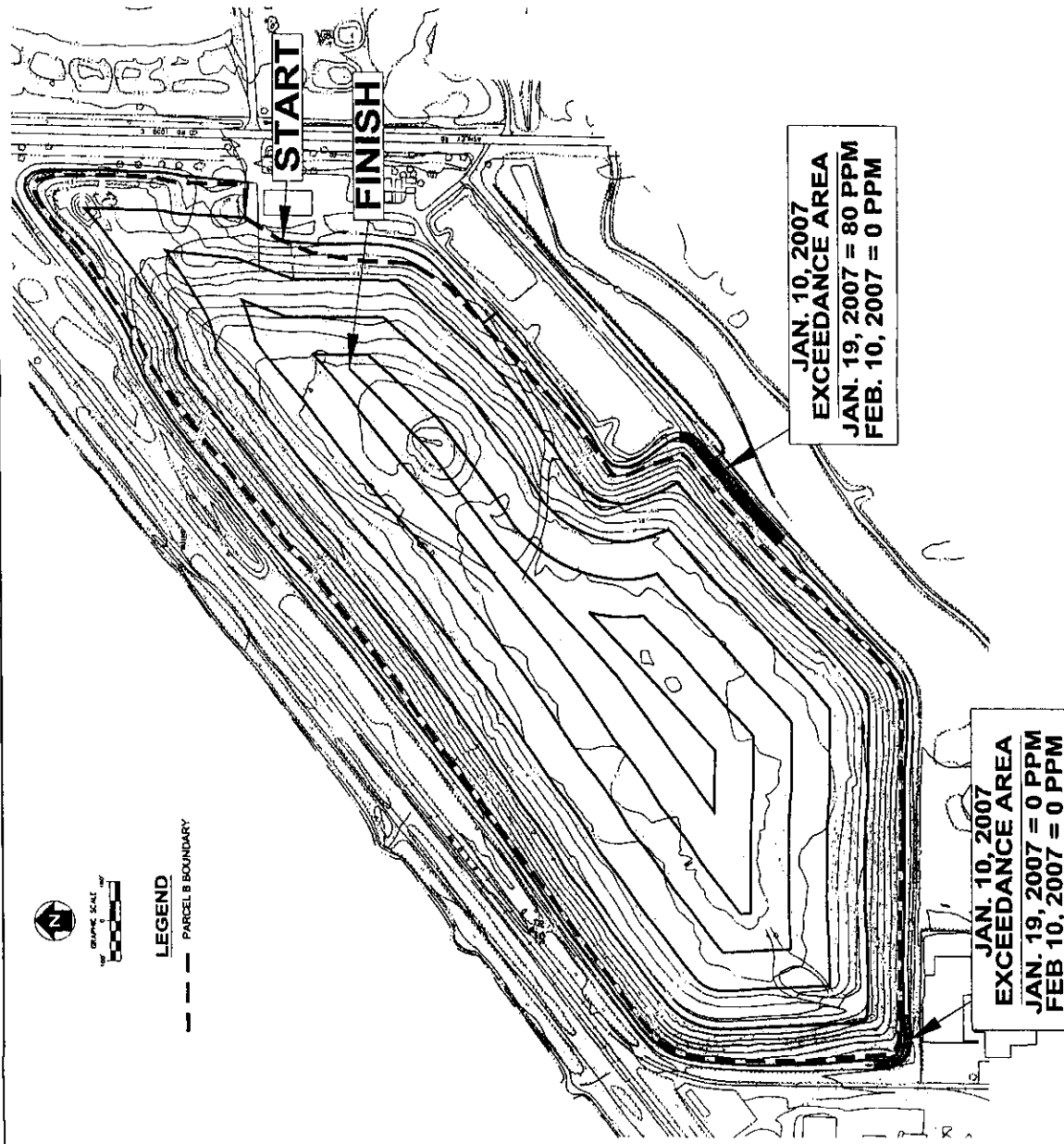
FIGURE 1

SAMPLING OVERVIEW:

SAMPLING DATE: FEBRUARY 10, 2007
 PERSONNEL: JOSH MAGARRY and DON WALSH
 EQUIPMENT USED: MINI-RAE MICRO FID
 WEATHER: SLIGHTLY CLOUDY
 TEMPERATURE: 6-12 DEGREES FAHRENHEIT
 WIND SPEED: 5 MPH
 WIND DIRECTION: NORTH-EASTERLY

NOTES:

ARRIVED ON-SITE AT APPROXIMATELY 8:30 A.M.
 CALIBRATED MINI-RAE FID. THEN BEGAN NSPS SAMPLING
 AT EXCEEDANCE AREA LOCATIONS SHOWN ON FIGURE
 PER TITLE 35, IAC SUBTITLE B, PART .220.252 (3) (D)
 ORGANIC VAPORS WERE NOT DETECTED IN EXCESS OF
 500 PPM IN THE AREAS SHOWN ON THE FIGURE.
 LEFT SITE AT APPROXIMATELY 10:00 A.M.



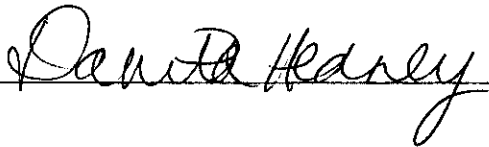
PROJ. NO. 112003 DATE FEB. 2007 OF DESIGNED BY: [blank] DRAWN BY: [blank] CHECKED BY: [blank]		MORRIS COMMUNITY LANDFILL - PARCEL B CITY OF MORRIS, ILLINOIS NSPS MONITORING	FIG. 1 1 OF 2 SHEETS
REV. NO. DATE DESCRIPTION		Shaw-Shaw Environmental, Inc.	

AFFIDAVIT OF SERVICE

The undersigned, pursuant to the provisions of Section 1-109 of the Illinois Code of Civil Procedure, hereby under penalty of perjury under the laws of the United States of America, certifies that on June 15, 2007, she caused to be served a copy of the foregoing upon:

Mr. Christopher Grant Assistant Attorney General Environmental Bureau 100 W. Randolph St., 11th Fl. Chicago, IL 60601	Mark LaRose Clarissa Grayson LaRose & Bosco, Ltd. 200 N. LaSalle, Suite 2810 Chicago, IL 60601
Ms. Dorothy Gunn, Clerk Pollution Control Board 100 W. Randolph, Suite 11-500 Chicago, IL 60601	Bradley Halloran Hearing Officer Pollution Control Board 100 W. Randolph, Suite 11 Chicago, IL 60601
Mr. Scott Belt 105 East Main Street Suite 206 Morris, Illinois 60450	

A copy of the same was enclosed in an envelope in the United States mail at Rockford, Illinois, proper postage prepaid, before the hour of 5:00 p.m., addressed as above.



HINSHAW & CULBERTSON
100 Park Avenue
P.O. Box 1389
Rockford, IL 61105-1389
(815) 490-4900