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STATE OF ILLINOIS
Pollution Control Board

Petto

SOLID WASTE
NORTH AMERICA

August 17, 2007

Clerk's Office Illinois Pollution Control Board 100 W. Randolph St. Suite 11-500 Chicago, IL 60601

Re: Support for Docket R07-8 - Proposed Amendments to 35 Ill. Adm Code 811 – Standards for New Solid Waste Landfills.

Dear Sir or Madame:

Veolia Environmental Services, Inc. (VES) currently owns and operates four landfills in Illinois. This letter has been prepared in support of and to request adoption of the changes developed by the Illinois Chapter of the NSWMA with concurrence of the IEPA and currently published for review by the Illinois Pollution Control Board in the Illinois Register. The proposed changes, which are based on science/scientific analysis rather than monitoring leachate and groundwater for every constituent possible, remain protective of human health while continuing to provide the ability to determine if a landfill or landfill operations have affected the environment or could be harmful to human health. Many of the constituents which were formerly analyzed in leachate and groundwater were not typical constituents that would have been present in leachate from municipal solid waste disposal and; therefore, would not be present in groundwater as a result of a release from the landfill. The leachate monitoring, from far too many monitoring points, currently conducted at landfills provides an enormous amount of analytical data with little relevance to actual constituents that would typically be present in leachate. The reduction in the number of leachate monitoring points as well as the tailored list of constituents will prove to be more manageable and be a more efficient and effective indicator of actual impacts which may occur related to landfill operations.

VES owns and operates landfills in other Midwestern states which include Missouri, Indiana, Michigan, Wisconsin and Minnesota. The proposed changes to the Illinois Code are consistent with regulations in these and other surrounding Midwest states.

We appreciate the Illinois Pollution Control Board's review and request adoption of the NSWMA proposal as outlined in the Illinois Register. Adoption of the proposed Code changes will improve the monitoring requirements of the Solid Waste Code in Illinois.

Sincerely,

Veolia Environmental Services, Inc.

Todd Watermolen, PE

Vice President - Engineering and Compliance

Anndelee J. Gregg, PG, CPG

Project Hydrogeologist