

To: Illinois Pollution Control Board
From: Tom L. Edwards
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CLERK'S OFFICE
JAN 07 2008
STATE OF ILLINOIS
Pollution Control Board

January 1, 2008

(3 pages)

Re: Addition to my Dec.31 request for time extension to appeal IEPA permit to PDC

Who I am:

I have to get the essence of my appeal (below) of the IEPA permit to PDC in the mail to meet the Jan. 1 appeal deadline date. Tomorrow I will send in more background material -- and a copy of the bulky 197-page EPA decision. Briefly, I am an environmental writer. Over the last 4 years I have researched and written 70 or 80 mostly one or two-page papers regarding PDC's hazardous waste landfill and its operation, and sent them variously to Peoria County Board, EPA, Pollution Control Board, and other officials.

99% of the public knew nothing of the landfill's existence until I wrote an expository petition (Jan., '04) and passed it out in the community to launch this campaign. Petitions with 7,100 signatures were mailed back, some kind of a record. (Will send a copy.)

Moreover, **nobody** in the Peoria County administration or county board was even aware that there was a state permit governing operation of PDC's landfill until this writer got one from the state and presented it to the board 4 years ago (January, 2004).

Re: IEPA's Revised Permit to Peoria Disposal Co.

Note: IEPA's cover letter sent out with its permit decision mistakenly states that the final date for the public to submit appeals "is January 7, 2007." **Also**, none of the forwarding letters or the decision are signed by the IEPA director, Doug Scott.

Missing from EPA's information is anything about the 1980 break at a PDC disposal cell through which toxic waste poured lava-like down a hillside and 3-feet deep over Rt. 8, and across a field down to Kickapoo Creek, said a witness. The road was closed. Federal HazMat agency came in space-age garb and earthmoving machinery to deal with it.

Grounds for Appeal:

-- All major limitations in the original permit are gone:

1 --From its 1987 beginning PDC's permit was for 2.63 million cubic yards of toxic waste to be put on its hilltop disposal site. That limitation still stands. But both PDC and IEPA are saying that limit has not yet been reached after 20 years of dumping via what was originally a 10-year permit

That is quite impossible. In tonnage 2.63 million cubic yards of toxic waste, according to an expert, is equivalent to about 900,000 tons, given the loose, even fluffy nature of much or most toxic waste. The waste comes in trucks from up to 15 states.

2 -- The much extended, now also modified permit, was to expire in 2006. EPA

summarily extended it to 2009 and says it will continue as long as the site has room.

3 -- The disposal area was original permitted for 64 acres. That has been expanded by the EPA to near 75 acres.

4 -- A height limitation is still in effect. But PDC has requested permission to go up another 45 feet (5 stories) higher than the 4 to 5 stories high it already is. That would make it the highest hill in that vicinity by far.

-- Overall, virtually all required data collection and reporting is left by the EPA for PDC to do itself, then send reports to EPA.

-- Until now collection of test samples from the present 21 monitoring wells has been, nominally, done jointly by PDC and an EPA representative on a quarterly basis. (There are 25 such well sites listed, but 4 are reported as never installed.)

However, it is PDC that tells EPA on what day to be there for drawing samples.

-- Collection of samples from test wells, formerly done quarterly, are now to be collected semi-annually, and a number only annually. (EPA staffers protested this change.) Leaks could go on for half a year without being detected under this arrangement.

-- EPA says an inspector regularly visits the site. But those visits are once, maybe twice, a month, and are only visual. This procedure is not spelled out in the permit. [During city highway-sidewalk construction, inspectors are constantly present.]

-- Despite monthly "visits," the EPA had been firm in saying there is no air pollution from the site. HOWEVER, EPA was totally unaware that PDC has vents on the site to release gaseous fumes to the air. In an unauthorized visit, I found and smelled such vents and reported their location to the EPA. (To his credit, when I told the site inspection manager he acknowledged he was unaware of them, and asked me where they were.)

Now the EPA is saying there is some dust around where the waste hauling trucks unload, that it is largely captured, and that elsewhere on the site any dust pollution is inconsequential.

BUT new research elsewhere shows gaseous toxic air pollutants from such landfills are very consequential to unborn babies and older people.

-- The EPA has the bulk of the test well samples analyzed by PDC's own laboratory, I have been advised. This seems a rather incestuous arrangement.

-- The federal EPA authorizes 843 chemicals to be put in this landfill (plus some PCBs). But checking for only 24 will be required just semi-annually, under the revised permit. And other toxic chemicals may even be present as contaminants of these 24.

The 843 chemicals allowed are preponderantly volatile, i.e., will evaporate.

-- Testing for highly toxic and very volatile mercury is not included though it is permitted in the landfill. Perhaps because it quickly evaporates off into the air.

-- The "barrel trench," i.e., toxic waste buried in metal barrels: It is highly unlikely that not one barrel isn't disintegrating from rust, leaving its 50,000 tons of toxic waste free in the soil just above the aquifer -- like the rest of the landfill -- from which the Peoria area pumps most of its water.

-- All of the 5 barrel trench monitoring wells are listed in EPA's long existing permit as "upgradient," meaning the groundwater is monitored going into the barrel trench rather than after it comes out. EPA says it now will require a "downgradient" well be installed to test groundwater traveling through the barrel trench into the city's water aquifer.

-- EPA says the flow rate of groundwater through the aquifer's sand soil is only 6 feet per year! It doesn't give the source of that statistic. A new measurement is needed.

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