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STATE OF ILLINOIS  
Pollution Control Board

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Dec. 31, 2007 JAN 04 2008

STATE OF ILLINOIS  
Pollution Control Board

Clerk of the Board  
Illinois Pollution Control Board  
100 W. Randolph  
Suite 11-500  
Chicago, IL 60601

PCB08-42

Re: Request for time extension to appeal IPCB permit to PDC

Dear Sirs:

With this letter we hereby request :

An extension of one month, January, to file appeals of the IEPA's new permit (termed "permit renewal") issued by the IEPA for the continued operation of the Peoria Disposal Co.'s hazardous waste landfill at Peoria with no terminal date.

Enclosed is an "overview" of objections and history, which will be followed with detailed objections and suggestions.

Explanation:

- 1) The period given by the IEPA to respond to its permit decision was precisely coterminous with the Christmas holiday season (Thanksgiving to New Year's Day) when people are deeply preoccupied with family and friends -- as I have been with my far-flung children and grandchildren.
- 2) This is a vital matter to the health and welfare of the people, and vitality, of the Peoria area, perhaps the most vital local issue in its history. Yet there has been no publicity about the existence of the revision of this hugely important permit.
- 3) There is no need to rush public response to this very technical document. It has been in effect, with IEPA extensions, for 20 years and has two years to go (2009) under its present extension. Its proposed replacement by the IEPA -- and first ever provision for public review -- deserves much more appropriate time for this needed review.

Thank you,

*Tom Edwards*

Tom Edwards/River Rescue  
902 W. Moss Ave.  
Peoria, IL 61606

To: Illinois Pollution Control Board:      From: Tom Edwards/River Rescue  
Dec. 31, 2007                                      902 W. Moss Ave., Peoria, IL 61606

Submitted with request for one month time extension for:  
Appeal of IEPA's Nov. 27, '07 RCRA permit renewal for PDC's Peoria landfill  
Preview of appeal follows:

**Overview: Toxic Waste Landfill Endangers Peoria Area**

Why would a government agency want to extend operation of what is now realized to be a dangerously located toxic waste landfill that puts the people of a major community in harms way? That is the situation with Peoria Disposal Co.'s hazardous waste landfill.

The daily dumping of highly toxic waste from much of the nation at PDC's Peoria landfill risks the well being of people of this area to benefit other communities -- and the landfill's owners. *It is a sacrifice* that does not have to be made, or permitted by EPA.

Instead, we need to have Illinois become a leader in safe, sane disposal of toxic, poisonous waste. But at present the state and federal EPAs permit 843 of the nation's most toxic chemicals from, so far, 15 states to either be put on a hilltop on Peoria's west edge to, later, be dirt covered and called a "landfill" -- or volatilize into the air, as much does.

1) PDC's toxic waste landfill, the only operating one in Illinois, is also the *only* one of 16 in 13 states that even sits near an aquifer from which most of a city's water is pumped. **And PDC's sits directly over Peoria's aquifer, as close as 50 feet above it.**  
2) PDC's landfill is also the only such one nationally that is immediately upwind of a municipality and the air its people breathe -- **and that also has a dense population living right up to the perimeter of such a landfill let alone near one.**

But staff of the Illinois EPA say they are **not allowed** to take into consideration the above two hugely vital matters to health and welfare. Also, neither were weighed in the issuance of PDC's toxic waste permit in 1987 by just learning government regulators. It was superimposed upon PDC's then 60-year-old general dumping site.

And now with less than two years left on PDC's present greatly extended permit -- instead of closure the IEPA is putting its efforts into "permit renewal" despite the Peoria County Board having exercised its legal right and voted "**no**" to a new permit. PDC appealed, but the county denial was upheld by the Illinois Pollution Control Board.

Recent scientific analyses of people elsewhere living near such toxic landfills have shown higher rates of birth defects, premature births, and strokes in older people. The federal EPA ranks Peoria County by far highest in Illinois for toxic chemical releases, and 16th in nation, with PDC's releases 21 times greater than the next highest in Peoria County.

While the IEPA presses to keep the PDC landfill in operation, there is no indication it is even suggesting safer, superior sites. IEPA staffers emphasize they are **not** allowed to do that, either. Yet Peoria County is surrounded by over 100,000 acres of stripmined land, including 17,000 acres of such vacant land owned by Cook County Sanitary District.

EPA's permit to PDC was originally for 10 years. But via extensions it is now in its 21st year. EPA has until now been regularly granting extensions without public hearings that it is mandated to hold. Now the IEPA has been preparing substitute permit language rather than preparing for closure of the landfill. The new permit issue has been before the county board for 4 years, the length of World War II.

**Yet IEPA is giving just this month -- the Christmas holiday period when people are most preoccupied -- for the public to digest its new 197-page highly technical permit.**

Yet, PDC has already well exceeded the EPA's original permitted waste volume, though it is titularly still in effect. And PDC has applied for a permit to triple its volume -- which would make its humongous hill of toxic waste the *highest* hill, by far, in its vicinity.

If we knew in 1987 what we know now, such a landfill in that location would certainly never have been permitted. State and federal officials need to correct that mistake. They can if they will.

**We ask that, rather than a new permit, the EPA concentrate on simply getting:**

- 1) Closure and post-closure regulations greatly strengthened;**
- 2) And stronger state laws regarding such landfills.**

(Note: Sources are available for all the above points.)

*Tom Edwards*

To: Illinois Pollution Control Board  
From: Tom L. Edwards  
902 W. Moss Ave.  
Peoria, IL 61606

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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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Tom Edwards

309-637-1979