

JUN 16 2004

STATE OF ILLINOIS
Pollution Control Board

Respondent.

Case No. PCB No. 04-48

local siting authority and, thereafter, the Illinois Environmental Protection Agency granted permits for the development and construction of the facility.

5. Clearly, these permits were erroneously overlooked in the creation of the record, as they are directly relevant to the issues presented in this case.

WHEREFORE, the Petitioners, VILLAGE OF ROBBINS and ALLIED WASTE TRANSPORTATION, INC. request this Honorable Board grant its Motion to Supplement Record to include the various permits, attached hereto.

Dated: June 15, 2004

Respectfully Submitted,

VILLAGE OF ROBBINS and ALLIED WASTE
TRANSPORTATION, INC., Petitioners

By: Hinshaw & Culbertson



Charles F. Helsten
One of Attorneys

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

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, 2004 , a copy of the foregoing was served upon:

Dorothy M. Gunn, Clerk
Illinois Pollution Control Board
James R. Thompson Center
100 West Randolph Street
Suite 11-500
Chicago, IL 60601

John J. Kim
Renee Cipriano
Special Assistant Attorney General
Division of Legal Counsel
1021 N. Grand Avenue, East
Springfield, IL 62794-9276

Mr. Brad Halloran
Hearing Officer
Illinois Pollution Control Board
100 West Randolph, 11th Floor
Chicago, Illinois 60601

Mr. William Mansker
Village of Robbins
3327 W. 137th Street
Robbins, IL 60472

Steve Smith
Allied Waste Transportation, Inc.
13701 South Kostner
Crestwood, IL 60445

By depositing a copy thereof, enclosed in an envelope in the United States Mail at Chicago, Illinois, proper postage prepaid, before the hour of 5:00 P.M., addressed as above.

_____

HINSHAW & CULBERTSON LLP
100 Park Avenue
P.O. Box 1369
Rockford, IL 61101
(815) 490-4900

This document utilized 100% recycled paper



State of Illinois

ENVIRONMENTAL PROTECTION AGENCY

Mary A. Gade, Director

2200 Churchill Road, Springfield, IL 62794-9276

217/524-3300

June 2, 1997

CERTIFIED MAIL

P 344 345 759

P 344 345 760

OWNER - Property
Village of Robbins
3327 W. 137th Street
Robbins, Illinois 60472

OWNER - Facility
Robbins Resource Recovery Partners, L.P.
Perryville Corporate Park
Clinton, New Jersey 08809-4000

OPERATOR
Foster Wheeler Illinois, Inc.
13400 South Kedzie Avenue
Robbins, Illinois 60472

Re: 0312700001 -- Cook County
Robbins Resource Recovery
Permit No. 1990-068-DE
Permit No. 1997-072-OP
Log No. 1997-072 (1994-300, 1989-189)
State Permit File

Gentlemen:

Permit is hereby granted to Village of Robbins as property owner, Robbins Resource Recovery Partners, L.P. as owner of the facility, and Foster Wheeler Illinois, Inc. as the operator, to operate a 16 acre solid waste management site to manage waste for introduction into a waste-to-energy facility all in the Village of Robbins, Cook County, Illinois. In addition, this permit allows the development and operation of a portable shredder. All plans, specifications, application and supporting documents as submitted and approved shall constitute part of this permit and are identified on the records of the Illinois Environmental Protection Agency, Division of Land Pollution Control by the permit number(s) and log number(s) designated in the heading above.

The permit is issued subject to the standard conditions attached hereto and incorporated herein by reference, and further subject to the following special conditions:

1. This permit allows for the operation of the units listed below.

<u>Unit Designation</u>	<u>Approximate Size</u>	<u>Proposed Use</u>
a. Tipping area	3000 ton capacity	storage of waste prior to processing

RRRP 015873

- | | | | |
|-------|---|-------------------------|--|
| b. | Portable shredder | .5 tons per hour. | to shred bulky waste |
| c. | Processing Lines (2) | 80 to 100 tons per hour | |
| i. | primary trommel | | screening of waste |
| ii. | shredder | | shreds wastes over 5 inches in size |
| iii. | magnets (5) | | to remove ferrous material |
| iv. | secondary trommel | | separation of waste into sizes |
| v. | air classifier | | removal of inert material |
| vi. | eddy current separator | | to remove aluminum cans |
| vii. | picking station | | to remove unacceptable material for waste removal and recovery of recyclable materials |
| viii. | glass and compost recovery system | | to separate organic material from the glass material |
| d. | Circulating fluidized bed boiler trains (2) | 600 ton per day (ave.) | |
| i. | combustion chamber | | waste to energy |
| ii. | cyclone | | to remove entrained material |

RRRP 015874

- c. Notwithstanding the above, the Permittee may accept waste for additional periods during extended curtailed facility operations caused by unusual circumstances only as approved in writing by the Illinois EPA.
3. This facility shall not accept special waste (i.e., hazardous waste, potentially infectious medical waste, pollution control waste or industrial process waste). Special waste does not include uncontaminated corrugated cardboard, wooden crates and pallets, plastics (both packaging and rigid materials), office waste (primarily paper and plastic) and cafeteria waste.
4. Special wastes (incinerator ash) generated at the site sent for disposal, storage, incineration or further treatment elsewhere shall be transported to the receiving facility utilizing the Illinois EPA's supplemental permit system and manifest system. The receiving ~~states~~ manifest if required may be used in place of an Illinois manifest.
5. A copy of all records and reports required by this permit shall be maintained in the facilities operating record. The operating record shall be made available by the Illinois EPA upon request. All information shall be maintained in the record for a period of at least three years beyond the date of the report.
6. The following information shall be included in the operating record and recorded daily:
 - a. the amount of waste delivered,
 - b. the amount of RDF produced (as calculated),
 - c. the amount of waste rejected,
 - d. the amount of unacceptable waste removed,
 - e. the amount of materials recovered (e.g., Fe, Al, glass),
 - f. the amount of bottom and fly ash removed,
 - g. where the above materials were taken to, and
 - h. the date and time any event results in the bypassing of the air pollution equipment,
 - i. an inspection certification. The operator shall certify daily that all incoming railroad ties were visually inspected.
7. On an annual basis, the Permittee shall familiarize local emergency response units with the contingency plan and document the date, time and contents of meetings held to comply with these requirements.
8. This permit is subject to review and modification by the Illinois EPA as deemed necessary to fulfill the intent and purpose of the Environmental Protection Act and all applicable environmental rules and regulations.
9. The Permittee shall notify the Illinois EPA of any changes from the information submitted to the Illinois EPA in its application for a development and operating permit for this site.

RRRP 015876

- iii. a superheater to raise steam temperature above saturation
 - iv. economizers preheat boiler feedwater
 - v. urea injection to control NO_x emissions
 - e. Spray dryer absorber baghouse system (2) size to handle approximately 85,500 SCFM each to remove acid gases and particulate
 - f. Ash storage silos (2) storage of ash prior to disposal
 - g. Ash conditioner mixes water with ash to control dust
 - h. RDF storage building 3000 ton capacity storage of RDF prior to burning
 - i. All corresponding sumps, pumps, piping, controls, loading and unloading areas and appurtenances
2. The Permittee may accept waste at the facility during periods of curtailed facility operations under the following conditions:
- a. During the first 14 days of curtailed operations waste may be accepted normally;
 - b. After fourteen days:
 - i. if one incinerator is in service, no more than 1120 tons per day (nominal) of waste may be accepted unless the excess amount can be processed or stored on site; and
 - ii. if both incinerators are out of service, no waste may be accepted until one incinerator is placed back in service.

Any modifications to the facilities shall be the subject of an application or supplement permit submitted to the Illinois EPA for those changes.

10. The incinerator ash destined for disposal shall be disposed of only in a properly permitted landfill.
11. All of the ash meets the definition of an industrial process waste and the fly ash portion is also considered a pollution control waste. The Permittee shall establish a reliable method of determining the amount of fly ash sent for disposal.
12. The Permittee shall submit a quarterly report to the Solid Waste Management Section, Division of Land Pollution Control which summarizes the amount of industrial process waste and pollution control waste for purposes of the solid waste fee system. The portion which is a pollution control waste will be exempt from fees.
13. The Permittee shall collect a weekly grab sample of the incinerator ash. The results from the analysis shall be made a part of the operating record. The weekly samples shall be composited quarterly and analyzed for the characteristics of a hazardous waste by TCLP as described in 35 Ill. Adm. Code 721.124 for the parameters; arsenic, barium, cadmium, chromium, lead, mercury, selenium and silver.
14. The following conditions are included pursuant to Section 22.16b(b):
 - a. The incinerator must be designed to provide continuous monitoring while in operation, with direct transmission of the resultant data to the Agency, until the Agency determines the best available control technology for monitoring the data. The Agency shall establish the test methods, procedures and averaging periods, as certified by the form and frequency of report containing results of the monitoring. Compliance and enforcement shall be based on such reports. Copies of the results of such monitoring shall be maintained on file at the facility concerned for one year, and copies shall be made available for inspection and copying by interested members of the public during business hours.

Also, please refer to operating permit 8812055 issued by the Illinois EPA's Bureau of Air.

- b. The facility shall comply with the emission limits adopted by the Agency under subsection (c).

Also, please refer to operating permit 8812055 issued by the Illinois EPA's Bureau of Air.

- c. The operator of the facility shall take reasonable measures to ensure that waste accepted for incineration complies with all legal requirements for incineration. The incinerator operator shall establish contractual requirements or other notification and inspection procedures sufficient to assure compliance with this subsection (b)(3) which may include, but not be limited to, routine inspections of waste, lists of acceptable and unacceptable waste provided to haulers and notification to the Agency when the facility operator reject and sends loads away. The notification shall contain at least the name of the hauler and the site from where the load was hauled.

Also, please refer to Special Condition Nos. 15, 16 and 21 herein.

- d. The operator may not accept for incineration any waste generated or collected in a municipality that has not implemented a recycling plan or is party to an implemented county plan, consistent with State goals and objectives. Such plans shall include provisions for collecting, recycling or diverting from landfills and municipal incinerators landscape waste, household hazardous waste and batteries. Such provisions may be performed at the site of the new municipal incinerator.

Also, please refer to Special Condition No. 18 and 19, herein.

- 15. Waste may be received for segregation into waste categories, one of which will be incinerated on site and the other sent off-site. The Permittee shall not accept waste which does not comply with the waste screening/analysis plan in the approved application Section 9.4 and Special Condition #3 herein. The procedures shall be modified to include screening for all unacceptable or prohibited waste and comply with the following conditions:
 - a. Upon unloading, the Permittee shall inspect each incoming load of waste to determine if the load contains waste which this facility is not permitted to receive in accordance with the procedures in the approved permit application Log 1989-189.
 - b. The Permittee shall inspect all wastes prior to placement into the incinerator feed system to remove waste which is unacceptable for incineration. If unacceptable waste is discovered, it shall be diverted from the incinerator feed and transported to a unit which is properly permitted to receive the waste.
 - c. The Permittee shall notify the Illinois EPA in writing within 48 hours of rejection of a load of unacceptable waste as described in the facilities waste inspection/analysis plan. The notification shall include at least the name of the hauler and site from where the load was hauled.
 - d. The Permittee shall visually inspect wastes which are processed to become part of the refuse derived fuel (RDF) system to remove wastes identified as prohibited waste in the Waste Management Practice Plan. Such wastes shall include but not be limited to:

1. explosives or ammunitions,
 2. combustible liquids or gas containers, bottles or cylinders or cans,
 3. batteries of any type including dry cell, wet cell, motor vehicle or marine,
 4. special wastes (i.e., industrial process waste, hazardous waste, pollution control waste or potentially infectious waste),
 5. radioactive wastes,
 6. asbestos wastes,
 7. waste regulated by the Toxic Substance Control Act,
 8. landscape waste,
 9. household hazardous waste,
 10. railroad ties treated with a material other than creosote,
 11. telephone poles, and
 12. tires.
- e. The Permittee shall provide a list of wastes which are unacceptable for receipt at this facility and list of examples of acceptable waste to each hauler before the hauler collects waste for transport to this facility.
16. The Permittee shall visually inspect used creosote-treated wood to verify that the wood is weathered and contains no surface deposits or stains. Unweathered wood, or wood which contains surface staining or deposits, is subject to the requirements of 35 Ill. Adm. Code 722.111 (by testing) to verify the wood is not characteristically hazardous.
17. Waste generated in Illinois Municipalities and Illinois counties outside of Hamilton County, Illinois as of June 2, 1997 are deemed to have complied with the requirements in Special Condition 14(d) and no further documentation is required. Provisions for collecting, recycling or diverting from landfills and municipal incinerators landscape waste, household hazardous waste and batteries may be performed at this site may be used to comply with these requirements.
18. Prior to receipt of waste from out-of-state or Hancock County, Illinois, the Permittee shall obtain a certification from the hauler that the waste was generated or collected in a municipality that has provisions for collecting, recycling or diverting household hazardous waste from landfills and municipal incinerators.
19. The facility shall perform routine housekeeping as outlined in Section 9.3.2 of the approved application Log #1989-189, to control litter. Routine housekeeping measures at a minimum shall include:
- a. inspection and maintenance of the equipment in accordance with the manufacturers recommendations;

- b. periodic sweeping and cleaning of tipping floor, RDF residue loading area, and bottom and fly ash loading area;
- c. daily janitorial cleaning of administrative office, sanitary and employee facilities, and control room;
- d. periodic sweeping and cleaning of floors in RDF production area and boiler building;
- e. periodic cleaning of turbine generator room;
- f. daily inspection and cleanup of yard area from spillage, litter, and other foreign materials;
- g. weekly cleaning and inspection of maintenance areas for orderlines and ~~safety~~ compliance with industrial standards;
- h. weekly inspection and cleaning of drainage basins, oil-water separators, sumps, etc.
- i. weekly fire and safety inspections.

The time and results date of each inspection shall be maintained in the operating record.

- 20. The facility shall be maintained and operated to prevent nuisance odors and litter outside the building by drawing air from inside the waste receiving, RDF processing and RDF storage buildings for combustion air in the combustors (or venting air through the combustors when they are not operational) and other necessary measures. Any litter present outside of the building shall be collected daily.
- 21. The load checking program shall consist of, at a minimum, the following components:
 - 1) Random inspections
 - A. An inspector designated by the facility shall examine at least three random loads of solid waste delivered to the landfill on a random day each week. The drivers randomly selected by the inspector shall be directed to discharge their loads at a separate, designated location within the facility. The facility shall conduct a detailed inspection of the discharged material for any regulated hazardous or other unacceptable wastes that may be present. Cameras or other devices may be used to record the visible contents of solid waste shipments. Where such devices are employed, their use should be designated on a sign posted near the entrance of the facility.

- B. If regulated hazardous wastes or other unacceptable wastes are suspected, the facility shall communicate with the generator, hauler or other party responsible for shipping the waste to the facility to determine the identity of the waste.

2) Recording inspection results

Information and observations derived from each random inspection shall be recorded in writing and retained at the facility for at least three years. The recorded information shall include, at a minimum the date and time of the inspection; the names of the hauling firm and the driver of the vehicle; the vehicle license plate number; the source of the waste, as stated by the driver; and observations made by the inspector during the detailed inspection. The written record shall be signed by both the inspector and the driver.

The "security wastes" are excluded from the random inspection program.

22. The permittee shall transport the compostable waste stream to a properly permitted facility. The only facilities in Illinois which may receive this waste stream for composting are mixed municipal waste composting facilities. If the compostable stream includes landscape waste that is not separated at the point of generation and collected and processed separately from the rest of the municipal waste stream, it is subject to the disposal prohibitions in Section 22.22(c) of the Environmental Protection Act.
23. The Permittee(s) shall notify the Illinois EPA's Bureau of Land in writing of its intent to close at least 45 days prior to the date closure is expected to begin. Along with this notification, the Permittee(s) shall submit the procedure and the sampling and analysis plan to be used in demonstrating the area has been properly decontaminated. This plan shall be approved by the Illinois EPA's Bureau of Land in writing prior to being implemented.
24. The operator shall notify the Illinois EPA within 30 days after receiving the final volume of waste.
25. The operator shall initiate implementation of the closure plan within 30 days after the site receives its final volume of waste.
26. The operator shall not file any application to modify the closure plan less than 180 days prior to receipt of the final volume of waste.
27. Upon completion of closure activities, the operator will 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 Completion of Closure of Non-Hazardous Waste Facilities."

27. Upon completion of closure activities, the operator will 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 Completion of Closure of Non-Hazardous Waste Facilities."
28. The Permittee is prohibited from placing white goods in the shredder unless the white goods components have been removed.
29. The Permittee may only burn waste that has been processed into RDF on site except for those wastes identified as "security waste" in the letter dated April 24 from Ross Hardees that are managed in compliance with the following conditions:

- a. The constituents in security waste must be readily identified by visual inspection notwithstanding any shredding or size reduction performed off-site;

For this purpose, a municipal waste shall be considered a security waste if it is a municipal waste and if its origin or circumstances effectively exclude the presence of undesirable components, such as household batteries; preclude recycling of the material; and generally assure that the waste is of a specific character or nature, as certified by the generator of the waste and verified by the Permittee. Examples of security wastes include garbage from international airline flights, which must be incinerated pursuant to US Department of Agriculture Rules, and bank or medical records, which must be destroyed to maintain client/patient privacy;

- b. The Permittee shall implement practices for handling of security waste at the facility that reasonably provide for identification and removal of any prohibited materials in the waste. At a minimum, these procedures shall include continuous oversight of each shipment of security waste at the facility by designated facility personnel until unloading is complete and the waste is mixed with other waste or RDF; and
- c. The Permittee shall maintain records for each source and type of security waste accepted by the facility and confirm that such waste is properly considered security waste and define the specific practices established for handling such waste at the facility, accompanied by reasonable supporting documentation and explanation. The Permittee shall also maintain records for each shipment of security waste that is received at the facility that include the date, time, waste source hauler, type and amount of waste for the shipment and that document implementation of the specified handling procedures by the facility, including the names and personnel of supervising the handling of the shipment.

Page 11

Within 35 days after the date of mailing of the Illinois EPA's final decision, the applicant may petition for a hearing before the Illinois Pollution Control Board to contest the decision of the Illinois EPA, however, the 35-day period for petitioning for a hearing may be extended for a period of time not to exceed 90 days by written notice provided to the Board from the applicant and the Illinois EPA within the 35-day initial appeal period.

Sincerely,



Edwin C. Bakowski, P.E.
Manager, Permit Section
Bureau of Land

ECB:MAS:bjh\973012S.WPD

RRRP 015883

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

July 1, 1979

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 Divisions of Water Pollution Control, Air Pollution Control, Public Water Supplies, and Land and Noise Pollution Control. Special conditions may also be imposed by the separate divisions 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, emission 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.

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- 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.

MLK:dh/17

RRRP 015885



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 North Grand Avenue East, P.O. Box 19276, Springfield, Illinois 62794-9276 Mary A. Gade, Director

217/524-3300

April 6, 1998

CERTIFIED MAIL

P 344 291 368

P 344 291 369

P 344 291 370

OWNER - Property

Village of Robbins
3327 W. 137th Street
Robbins, Illinois 60472

OWNER - Facility

Robbins Resource Recovery Partners, L.P.
Perryville Corporate Park
Clinton, New Jersey 08809-4000

OPERATOR

Foster Wheeler Illinois, Inc.
13400 South Kedzie Avenue
Robbins, Illinois 60472

Re: 0312700001 -- Cook County
Robbins Resource Recovery
Permit No. 1990-068-DE
Permit No. 1997-072-OP
Supplemental Permit 1998-030-DE
Log No. 1998-038, 1998-030, (1997-072, 1994-300, 1989-189)
State Permit File

Gentlemen:

This supplemental permit is hereby granted to Village of Robbins as property owner, Robbins Resource Recovery Partners, L.P. as owner of the facility, and Foster Wheeler Illinois, Inc. as the operator to modify the operation of the solid waste management site by (1) installing a portable conveyor to convey security and railroad wastes directly onto the shredder processing line and (2) reducing the role of the stripper coolers to a back-up role by installing two discharge hoppers (chutes) which are cooled by noozles and water sprays. The site consists of a 16 acre site in the Village of Robbins, Cook County, Illinois.

All plans, specifications, application and supporting documents as submitted and approved shall constitute part of this permit and are identified on the records of the Illinois Environmental Protection Agency, Division of Land Pollution Control by the permit number(s) and log number(s) designated in the heading above.

The permit is issued subject to the standard conditions attached hereto and incorporated herein by reference, and further subject to the following special conditions:

1. This permit allows for the operation of the units listed below.

SCREENED
M M

<u>Unit Designation</u>	<u>Approximate Size</u>	<u>Proposed Use</u>
a. Tipping area	3000 ton capacity	storage of waste prior to processing
b. Portable shredder	5 tons per hour.	to shred bulky waste
c. Processing Lines (2)	80 to 100 tons per hour	
i. primary trommel		screening of waste
ii. shredder		shreds wastes over 5 inches in size
iii. magnets (5)		to remove ferrous material
iv. secondary trommel		separation of waste into sizes
v. air classifier		removal of inert material
vi. eddy current separator		to remove aluminum cans
vii. picking station		to remove unacceptable material for waste removal and recovery of recyclable materials
viii. glass and compost recovery system		to separate organic material from the glass material
d. Circulating fluidized bed boiler trains (2)	600 ton per day (ave.)	

CE-100-02
11 11

- i. combustion chamber waste to energy
 - ii. cyclone to remove entrained material
 - iii. a superheater to raise steam temperature above saturation
 - iv. economizers preheat boiler feedwater
 - v. urea injection to control NO_x emissions
 - e. Spray dryer absorber baghouse system (2) size to handle approximately 85,500 SCFM each to remove acid gases and particulate
 - f. Ash storage silos (2) storage of ash prior to disposal
 - g. Ash conditioner mixes water with ash to control dust
 - h. RDF storage building 3000 ton capacity storage of RDF prior to burning
 - i. All corresponding sumps, pumps, piping, controls, loading and unloading areas and appurtenances
2. The Permittee may accept waste at the facility during periods of curtailed facility operations under the following conditions:
- a. During the first 14 days of curtailed operations waste may be accepted normally;
 - b. After fourteen days:

- i. if one incinerator is in service, no more than 1120 tons per day (nominal) of waste may be accepted unless the excess amount can be processed or stored on site; and
 - ii. if both incinerators are out of service, no waste may be accepted until one incinerator is placed back in service.
 - c. Notwithstanding the above, the Permittee may accept waste for additional periods during extended curtailed facility operations caused by unusual circumstances only as approved in writing by the Illinois EPA.
3. This facility shall not accept special waste (i.e., hazardous waste, potentially infectious medical waste, pollution control waste or industrial process waste). Special waste does not include uncontaminated corrugated cardboard, wooden crates and pallets, plastics (both packaging and rigid materials), office waste (primarily paper and plastic) and cafeteria waste.
 4. Special wastes (incinerator ash) generated at the site sent for disposal, storage, incineration or further treatment elsewhere shall be transported to the receiving facility utilizing the Illinois EPA's supplemental permit system and manifest system. The receiving state's manifest if required may be used in place of an Illinois manifest.
 5. A copy of all records and reports required by this permit shall be maintained in the facility's operating record. The operating record shall be made available by the Illinois EPA upon request. All information shall be maintained in the record for a period of at least three years beyond the date of the report.
 6. The following information shall be included in the operating record and recorded daily:
 - a. the amount of waste delivered,
 - b. the amount of RDF produced (as calculated),
 - c. the amount of waste rejected,
 - d. the amount of unacceptable waste removed,
 - e. the amount of materials recovered (e.g., Fe, Al, glass),
 - f. the amount of bottom and fly ash removed,
 - g. where the above materials were taken to, and
 - h. the date and time any event results in the bypassing of the air pollution equipment,
 - i. an inspection certification. The operator shall certify daily that all incoming railroad ties were visually inspected.
 7. On an annual basis, the Permittee shall familiarize local emergency response units with the contingency plan and document the date, time and contents of meetings held to comply with these requirements.

8. This permit is subject to review and modification by the Illinois EPA as deemed necessary to fulfill the intent and purpose of the Environmental Protection Act and all applicable environmental rules and regulations.
9. The Permittee shall notify the Illinois EPA of any changes from the information submitted to the Illinois EPA in its application for a development and operating permit for this site. Any modifications to the facilities shall be the subject of an application or supplement permit submitted to the Illinois EPA for those changes.
10. The incinerator ash destined for disposal shall be disposed of only in a properly permitted landfill.
11. All of the ash meets the definition of an industrial process waste and the fly ash portion is also considered a pollution control waste. The Permittee shall establish a reliable method of determining the amount of fly ash sent for disposal.
12. The Permittee shall submit a quarterly report to the Solid Waste Management Section, Division of Land Pollution Control which summarizes the amount of industrial process waste and pollution control waste for purposes of the solid waste fee system. The portion which is a pollution control waste will be exempt from fees.
13. The Permittee shall collect a weekly grab sample of the incinerator ash. The results from the analysis shall be made a part of the operating record. The weekly samples shall be composited quarterly and analyzed for the characteristics of a hazardous waste by TCLP as described in 35 Ill. Adm. Code 721.124 for the parameters; arsenic, barium, cadmium, chromium, lead, mercury, selenium and silver.
14. The following conditions are included pursuant to Section 22.16b(b):
 - a. The incinerator must be designed to provide continuous monitoring while in operation, with direct transmission of the resultant data to the Illinois EPA, until the Illinois EPA determines the best available control technology for monitoring the data. The Illinois EPA shall establish the test methods, procedures and averaging periods, as certified by the form and frequency of report containing results of the monitoring. Compliance and enforcement shall be based on such reports. Copies of the results of such monitoring shall be maintained on file at the facility concerned for one year, and copies shall be made available for inspection and copying by interested members of the public during business hours.

Also, please refer to operating permit 8812055 issued by the Illinois EPA's Bureau of Air.

- b. The facility shall comply with the emission limits adopted by the Illinois EPA under subsection (c).

Also, please refer to operating permit 8812055 issued by the Illinois EPA's Bureau of Air.

- c. The operator of the facility shall take reasonable measures to ensure that waste accepted for incineration complies with all legal requirements for incineration. The incinerator operator shall establish contractual requirements or other notification and inspection procedures sufficient to assure compliance with this subsection (b)(3) which may include, but not be limited to, routine inspections of waste, lists of acceptable and unacceptable waste provided to haulers and notification to the Agency when the facility operator reject and sends loads away. The notification shall contain at least the name of the hauler and the site from where the load was hauled.

Also, please refer to Special Condition Nos. 15, 16 and 21 herein.

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Also, please refer to Special Condition No. 18 and 19, herein.

- 15. Waste may be received for segregation into waste categories, one of which will be incinerated on site and the other sent off-site. The Permittee shall not accept waste which does not comply with the waste screening/analysis plan in the approved application Section 9.4 and Special Condition #3 herein. The procedures shall be modified to include screening for all unacceptable or prohibited waste and comply with the following conditions:
 - a. Upon unloading, the Permittee shall inspect each incoming load of waste to determine if the load contains waste which this facility is not permitted to receive in accordance with the procedures in the approved permit application Log 1989-189.
 - b. The Permittee shall inspect all wastes prior to placement into the incinerator feed system to remove waste which is unacceptable for incineration. If unacceptable waste is discovered, it shall be diverted from the incinerator feed and transported to a unit which is properly permitted to receive the waste.
 - c. The Permittee shall notify the Illinois EPA in writing within 48 hours of rejection of a load of unacceptable waste as described in the facilities waste inspection/analysis plan.

The notification shall include at least the name of the hauler and site from where the load was hauled.

- d. The Permittee shall visually inspect wastes which are processed to become part of the refuse derived fuel (RDF) system to remove wastes identified as prohibited waste in the Waste Management Practice Plan. Such wastes shall include but not be limited to:
 1. explosives or ammunitions,
 2. combustible liquids or gas containers, bottles or cylinders or cans,
 3. batteries of any type including dry cell, wet cell, motor vehicle or marine,
 4. special wastes (i.e., industrial process waste, hazardous waste, pollution control waste or potentially infectious waste),
 5. radioactive wastes,
 6. asbestos wastes,
 7. waste regulated by the Toxic Substance Control Act,
 8. landscape waste,
 9. household hazardous waste,
 10. railroad ties treated with a material other than creosote,
 11. telephone poles, and
 12. tires.
 - e. The Permittee shall provide a list of wastes which are unacceptable for receipt at this facility and list of examples of acceptable waste to each hauler before the hauler collects waste for transport to this facility.
16. The Permittee shall visually inspect used creosote-treated wood to verify that the wood is weathered and contains no surface deposits or stains. Unweathered wood, or wood which contains surface staining or deposits, is subject to the requirements of 35 Ill. Adm. Code 722.111 (by testing) to verify the wood is not characteristically hazardous.
 17. Waste generated in Illinois municipalities and Illinois counties outside of Hamilton County, Illinois as of June 2, 1997 are deemed to have complied with the requirements in Special Condition 14(d) and no further documentation is required. Provisions for collecting, recycling or diverting from landfills and municipal incinerators landscape waste, household hazardous waste and batteries may be performed at this site may be used to comply with these requirements.
 18. Prior to receipt of waste from out-of-state or Hamilton County, Illinois, the Permittee shall obtain a certification from the hauler that the waste was generated or collected in a municipality that has provisions for collecting, recycling or diverting household hazardous waste from landfills and municipal incinerators.

19. The facility shall perform routine housekeeping as outlined in Section 9.3.2 of the approved application Log #1989-189, to control litter. Routine housekeeping measures at a minimum shall include:
- a. inspection and maintenance of the equipment in accordance with the manufacturer's recommendations;
 - b. periodic sweeping and cleaning of tipping floor, RDF residue loading area, and bottom and fly ash loading area;
 - c. daily janitorial cleaning of administrative office, sanitary and employee facilities, and control room;
 - d. periodic sweeping and cleaning of floors in RDF production area and boiler building;
 - e. periodic cleaning of turbine generator room;
 - f. daily inspection and cleanup of yard area from spillage, litter, and other foreign materials;
 - g. weekly cleaning and inspection of maintenance areas for orderliness and safety compliance with industrial standards;
 - h. weekly inspection and cleaning of drainage basins, oil-water separators, sumps, etc.
 - i. weekly fire and safety inspections.

The time and results date of each inspection shall be maintained in the operating record.

20. The facility shall be maintained and operated to prevent nuisance odors and litter outside the building by drawing air from inside the waste receiving, RDF processing and RDF storage buildings for combustion air in the combustors (or venting air through the combustors when they are not operational) and other necessary measures. Any litter present outside of the building shall be collected daily.
21. The load checking program shall consist of, at a minimum, the following components:
- 1) Random inspections
 - A. An inspector designated by the facility shall examine at least three random loads of solid waste delivered to the landfill on a random day each week. The drivers randomly selected by the inspector shall be directed to discharge their loads at a

separate, designated location within the facility. The facility shall conduct a detailed inspection of the discharged material for any regulated hazardous or other unacceptable wastes that may be present. Cameras or other devices may be used to record the visible contents of solid waste shipments. Where such devices are employed, their use should be designated on a sign posted near the entrance of the facility.

- B. If regulated hazardous wastes or other unacceptable wastes are suspected, the facility shall communicate with the generator, hauler or other party responsible for shipping the waste to the facility to determine the identity of the waste.

2) Recording inspection results

Information and observations derived from each random inspection shall be recorded in writing and retained at the facility for at least three years. The recorded information shall include, at a minimum the date and time of the inspection; the names of the hauling firm and the driver of the vehicle; the vehicle license plate number; the source of the waste, as stated by the driver; and observations made by the inspector during the detailed inspection. The written record shall be signed by both the inspector and the driver.

The "security wastes" are excluded from the random inspection program.

- 22. The permittee shall transport the compostable waste stream to a properly permitted facility. The only facilities in Illinois which may receive this waste stream for composting are mixed municipal waste composting facilities. If the compostable stream includes landscape waste that is not separated at the point of generation and collected and processed separately from the rest of the municipal waste stream, it is subject to the disposal prohibitions in Section 22.22(c) of the Environmental Protection Act.
- 23. The Permittee(s) shall notify the Illinois EPA's Bureau of Land in writing of its intent to close at least 45 days prior to the date closure is expected to begin. Along with this notification, the Permittee(s) shall submit the procedure and the sampling and analysis plan to be used in demonstrating the area has been properly decontaminated. This plan shall be approved by the Illinois EPA's Bureau of Land in writing prior to being implemented.
- 24. The operator shall notify the Illinois EPA within 30 days after receiving the final volume of waste.
- 25. The operator shall initiate implementation of the closure plan within 30 days after the site receives its final volume of waste.

26. The operator shall not file any application to modify the closure plan less than 180 days prior to receipt of the final volume of waste.
27. Upon completion of closure activities, the operator will 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 Completion of Closure of Non-Hazardous Waste Facilities."
28. The Permittee is prohibited from placing white goods in the shredder unless the white goods components have been removed.
29. The Permittee may only burn waste that has been processed into RDF on site except for those wastes identified as "security waste". A security waste is defined as municipal waste where the origin or circumstances effectively exclude the presence of undesirable components, such as household batteries; preclude recycling of the material; and generally assure that the waste is of a specific character or nature, as certified by the generator of the waste and verified by the Permittee. Examples of security wastes include garbage from international airline flights, which must be incinerated pursuant to US Department of Agriculture Rules, and bank or medical records, which must be destroyed to maintain client/patient privacy. Security wastes must be managed in compliance with the following conditions:
 - a. The constituents in security waste must be readily identified by visual inspection notwithstanding any shredding or size reduction performed off-site;
 - b. The Permittee shall implement practices for handling of security waste at the facility that reasonably provide for identification and removal of any prohibited materials in the waste. At a minimum, these procedures shall include continuous oversight of each shipment of security waste at the facility by designated facility personnel until unloading is complete and the waste is mixed with other waste or RDF; and
 - c. The Permittee shall maintain records for each source and type of security waste accepted by the facility and confirm that such waste is properly considered security waste and define the specific practices established for handling such waste at the facility, accompanied by reasonable supporting documentation and explanation. The Permittee shall also maintain records for each shipment of security waste that is received at the facility that include the date, time, waste source, hauler, type and amount of waste for the shipment and that document implementation of the specified handling procedures by the facility, including the names and personnel of supervising the handling of the shipment.
30. Only "security waste" as defined in condition no. 29 and railroad ties may be placed into the portable conveyor device.

31. The modifications: 1) to use a portable conveyor to convey security and railroad wastes directly onto the shredder processing line, and (2) reduce the role of the stripper coolers to a back-up role as approved in Supplemental Permit 1998-030-DE are authorized for construction and development only. The applicant must notify the Illinois EPA in writing that development has been completed in accordance with the supplemental permit and submit an application for an operating permit before a pre-operation inspection can be conducted or an operating permit can be issued shall not be implemented until an operating permit is approved.

Within 35 days after the date of mailing of the Illinois EPA's final decision, the applicant may petition for a hearing before the Illinois Pollution Control Board to contest the decision of the Illinois EPA, however, the 35-day period for petitioning for a hearing may be extended for a period of time not to exceed 90 days by written notice provided to the Board from the applicant and the Illinois EPA within the 35-day initial appeal period.

Sincerely,



Edwin C. Bakowski, P.E.
Manager, Permit Section
Bureau of Land

ECB:MAS:bjh973012S.WPD

bcc: Bureau File
Maywood Region
DLC-Kyle Davis
Ted Dragovich
Mark Schollenberger



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 North Grand Avenue East, P.O. Box 19276, Springfield, Illinois 62794-9276

Mary A. Gade, Director

217/524-3300

June 3, 1998

CERTIFIED MAIL

P 344 291 483

P 344 291 484

P 344 291 485

OWNER - Property

Village of Robbins
3327 W. 137th Street
Robbins, Illinois 60472

OWNER - Facility

Robbins Resource Recovery Partners, L.P.
Perryville Corporate Park
Clinton, New Jersey 08809-4000

OPERATOR

Foster Wheeler Illinois, Inc.
13400 South Kedzie Avenue
Robbins, Illinois 60472

Re: 0312700001 -- Cook County
Robbins Resource Recovery
Permit No. 1990-068-DE
Permit No. 1997-072-OP
Supplemental Permit 1998-078-DE
Log No. 1998-038, 1998-030, (1997-072, 1994-300, 1989-189)
State Permit File

JUN 3 1998

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ILLIN.

Gentlemen:

This supplemental permit is hereby granted to Village of Robbins as property owner, Robbins Resource Recovery Partners, L.P. as owner of the facility, and Foster Wheeler Illinois, Inc. as the operator to modify the operation of the solid waste management site by retrofitting two conveyors with a head pulley magnet. The site consists of a 16 acre site in the Village of Robbins, Cook County, Illinois.

All plans, specifications, application and supporting documents as submitted and approved shall constitute part of this permit and are identified on the records of the Illinois Environmental Protection Agency, Division of Land Pollution Control by the permit number(s) and log number(s) designated in the heading above.

The permit is issued subject to the standard conditions attached hereto and incorporated herein by reference, and further subject to the following special conditions:

1. This permit allows for the operation of the units listed below.

<u>Unit Designation</u>	<u>Approximate Size</u>	<u>Proposed Use</u>
a. Tipping area	3000 ton capacity	storage of waste prior to processing
b. Portable shredder	5 tons per hour.	to shred bulky waste
c. Processing Lines (2)	80 to 100 tons per hour	
i. primary trommel		screening of waste
ii. shredder		shreds wastes over 5 inches in size
iii. magnets (7)		to remove ferrous material
iv. secondary trommel		separation of waste into sizes
v. air classifier		removal of inert material
vi. eddy current separator		to remove aluminum cans
vii. picking station		to remove unacceptable material for waste removal and recovery of recyclable materials
viii. glass and compost recovery system		to separate organic material from the glass material
d. Circulating fluidized bed boiler trains (2)	600 ton per day (ave.)	

- i. combustion chamber waste to energy
- ii. cyclone to remove entrained material
- iii. a superheater to raise steam temperature above saturation
- iv. economizers preheat boiler feedwater
- v. urea injection to control NO_x emissions
- e. Spray dryer absorber baghouse system (2) size to handle approximately 85,500 SCFM each to remove acid gases and particulate
- f. Ash storage silos (2) storage of ash prior to disposal
- g. Ash conditioner mixes water with ash to control dust
- h. RDF storage building 3000 ton capacity storage of RDF prior to burning
- i. All corresponding sumps, pumps, piping, controls, loading and unloading areas and appurtenances

2. The Permittee may accept waste at the facility during periods of curtailed facility operations under the following conditions:

- a. During the first 14 days of curtailed operations waste may be accepted normally;
- b. After fourteen days:

- i. if one incinerator is in service, no more than 1120 tons per day (nominal) of waste may be accepted unless the excess amount can be processed or stored on site; and
 - ii. if both incinerators are out of service, no waste may be accepted until one incinerator is placed back in service.
- c. Notwithstanding the above, the Permittee may accept waste for additional periods during extended curtailed facility operations caused by unusual circumstances only as approved in writing by the Illinois EPA.
3. This facility shall not accept special waste (i.e., hazardous waste, potentially infectious medical waste, pollution control waste or industrial process waste). Special waste does not include uncontaminated corrugated cardboard, wooden crates and pallets, plastics (both packaging and rigid materials), office waste (primarily paper and plastic) and cafeteria waste.
4. Special wastes (incinerator ash) generated at the site sent for disposal, storage, incineration or further treatment elsewhere shall be transported to the receiving facility utilizing the Illinois EPA's supplemental permit system and manifest system. The receiving state's manifest if required may be used in place of an Illinois manifest.
5. A copy of all records and reports required by this permit shall be maintained in the facility's operating record. The operating record shall be made available by the Illinois EPA upon request. All information shall be maintained in the record for a period of at least three years beyond the date of the report.
6. The following information shall be included in the operating record and recorded daily:
 - a. the amount of waste delivered,
 - b. the amount of RDF produced (as calculated),
 - c. the amount of waste rejected,
 - d. the amount of unacceptable waste removed,
 - e. the amount of materials recovered (e.g., Fe, Al, glass),
 - f. the amount of bottom and fly ash removed,
 - g. where the above materials were taken to, and
 - h. the date and time any event results in the bypassing of the air pollution equipment,
 - i. an inspection certification. The operator shall certify daily that all incoming railroad ties were visually inspected.
7. On an annual basis, the Permittee shall familiarize local emergency response units with the contingency plan and document the date, time and contents of meetings held to comply with these requirements.

8. This permit is subject to review and modification by the Illinois EPA as deemed necessary to fulfill the intent and purpose of the Environmental Protection Act and all applicable environmental rules and regulations.
9. The Permittee shall notify the Illinois EPA of any changes from the information submitted to the Illinois EPA in its application for a development and operating permit for this site. Any modifications to the facilities shall be the subject of an application or supplement permit submitted to the Illinois EPA for those changes.
10. The incinerator ash destined for disposal shall be disposed of only in a properly permitted landfill.
11. All of the ash meets the definition of an industrial process waste and the fly ash portion is also considered a pollution control waste. The Permittee shall establish a reliable method of determining the amount of fly ash sent for disposal.
12. The Permittee shall submit a quarterly report to the Solid Waste Management Section, Division of Land Pollution Control which summarizes the amount of industrial process waste and pollution control waste for purposes of the solid waste fee system. The portion which is a pollution control waste will be exempt from fees.
13. The Permittee shall collect a weekly grab sample of the incinerator ash. The results from the analysis shall be made a part of the operating record. The weekly samples shall be composited quarterly and analyzed for the characteristics of a hazardous waste by TCLP as described in 35 Ill. Adm. Code 721.124 for the parameters; arsenic, barium, cadmium, chromium, lead, mercury, selenium and silver.
14. The following conditions are included pursuant to Section 22.16b(b):
 - a. The incinerator must be designed to provide continuous monitoring while in operation, with direct transmission of the resultant data to the Illinois EPA, until the Illinois EPA determines the best available control technology for monitoring the data. The Illinois EPA shall establish the test methods, procedures and averaging periods, as certified by the form and frequency of report containing results of the monitoring. Compliance and enforcement shall be based on such reports. Copies of the results of such monitoring shall be maintained on file at the facility concerned for one year, and copies shall be made available for inspection and copying by interested members of the public during business hours.

Also, please refer to operating permit 8812055 issued by the Illinois EPA's Bureau of Air.

- b. The facility shall comply with the emission limits adopted by the Illinois EPA under subsection (c).

Also, please refer to operating permit 8812055 issued by the Illinois EPA's Bureau of Air.

- c. The operator of the facility shall take reasonable measures to ensure that waste accepted for incineration complies with all legal requirements for incineration. The incinerator operator shall establish contractual requirements or other notification and inspection procedures sufficient to assure compliance with this subsection (b)(3) which may include, but not be limited to, routine inspections of waste, lists of acceptable and unacceptable waste provided to haulers and notification to the Agency when the facility operator reject and sends loads away. The notification shall contain at least the name of the hauler and the site from where the load was hauled.

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 - 4. special wastes (i.e., industrial process waste, hazardous waste, pollution control waste or potentially infectious waste),
 - 5. radioactive wastes,
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- a. inspection and maintenance of the equipment in accordance with the manufacturer's recommendations;
 - b. periodic sweeping and cleaning of tipping floor, RDF residue loading area, and bottom and fly ash loading area;
 - c. daily janitorial cleaning of administrative office, sanitary and employee facilities, and control room;
 - d. periodic sweeping and cleaning of floors in RDF production area and boiler building;
 - e. periodic cleaning of turbine generator room;
 - f. daily inspection and cleanup of yard area from spillage, litter, and other foreign materials;
 - g. weekly cleaning and inspection of maintenance areas for orderliness and safety compliance with industrial standards;
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separate, designated location within the facility. The facility shall conduct a detailed inspection of the discharged material for any regulated hazardous or other unacceptable wastes that may be present. Cameras or other devices may be used to record the visible contents of solid waste shipments. Where such devices are employed, their use should be designated on a sign posted near the entrance of the facility.

- B. If regulated hazardous wastes or other unacceptable wastes are suspected, the facility shall communicate with the generator, hauler or other party responsible for shipping the waste to the facility to determine the identity of the waste.

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Information and observations derived from each random inspection shall be recorded in writing and retained at the facility for at least three years. The recorded information shall include, at a minimum the date and time of the inspection; the names of the hauling firm and the driver of the vehicle; the vehicle license plate number; the source of the waste, as stated by the driver; and observations made by the inspector during the detailed inspection. The written record shall be signed by both the inspector and the driver.

The "security wastes" are excluded from the random inspection program.

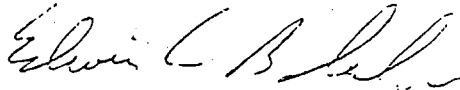
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- 23. The Permittee(s) shall notify the Illinois EPA's Bureau of Land in writing of its intent to close at least 45 days prior to the date closure is expected to begin. Along with this notification, the Permittee(s) shall submit the procedure and the sampling and analysis plan to be used in demonstrating the area has been properly decontaminated. This plan shall be approved by the Illinois EPA's Bureau of Land in writing prior to being implemented.
- 24. The operator shall notify the Illinois EPA within 30 days after receiving the final volume of waste.
- 25. The operator shall initiate implementation of the closure plan within 30 days after the site receives its final volume of waste.

26. The operator shall not file any application to modify the closure plan less than 180 days prior to receipt of the final volume of waste.
27. Upon completion of closure activities, the operator will 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 Completion of Closure of Non-Hazardous Waste Facilities."
28. The Permittee is prohibited from placing white goods in the shredder unless the white goods components have been removed.
29. The Permittee may only burn waste that has been processed into RDF on site except for those wastes identified as "security waste". A security waste is defined as municipal waste where the origin or circumstances effectively exclude the presence of undesirable components, such as household batteries; preclude recycling of the material; and generally assure that the waste is of a specific character or nature, as certified by the generator of the waste and verified by the Permittee. Examples of security wastes include garbage from international airline flights, which must be incinerated pursuant to US Department of Agriculture Rules, and bank or medical records, which must be destroyed to maintain client/patient privacy. Security wastes must be managed in compliance with the following conditions:
 - a. The constituents in security waste must be readily identified by visual inspection notwithstanding any shredding or size reduction performed off-site;
 - b. The Permittee shall implement practices for handling of security waste at the facility that reasonably provide for identification and removal of any prohibited materials in the waste. At a minimum, these procedures shall include continuous oversight of each shipment of security waste at the facility by designated facility personnel until unloading is complete and the waste is mixed with other waste or RDF; and
 - c. The Permittee shall maintain records for each source and type of security waste accepted by the facility and confirm that such waste is properly considered security waste and define the specific practices established for handling such waste at the facility, accompanied by reasonable supporting documentation and explanation. The Permittee shall also maintain records for each shipment of security waste that is received at the facility that include the date, time, waste source, hauler, type and amount of waste for the shipment and that document implementation of the specified handling procedures by the facility, including the names and personnel of supervising the handling of the shipment.
30. Only "security waste" as defined in condition no. 29 and railroad ties may be placed into the portable conveyor device.

31. The modifications: 1) to use a portable conveyor to convey security and railroad wastes directly onto the shredder processing line, and (2) reduce the role of the stripper coolers to a back-up role as approved in Supplemental Permit 1998-030-DE are authorized for construction and development only. The applicant must notify the Illinois EPA in writing that development has been completed in accordance with the supplemental permit and submit an application for an operating permit before a pre-operation inspection can be conducted or an operating permit can be issued. The modifications shall not be implemented until an operating permit is approved.
32. The modification, to retrofit the two existing conveyors (CR-354A and B) with a head pulley magnet, is authorized for construction and development only. The applicant must notify the Illinois EPA in writing that development has been completed in accordance with the supplemental permit and submit an application for an operating permit before a pre-operation inspection can be conducted or an operating permit can be issued. The modifications shall not be implemented until an operating permit is approved.

Within 35 days after the date of mailing of the Illinois EPA's final decision, the applicant may petition for a hearing before the Illinois Pollution Control Board to contest the decision of the Illinois EPA, however, the 35-day period for petitioning for a hearing may be extended for a period of time not to exceed 90 days by written notice provided to the Board from the applicant and the Illinois EPA within the 35-day initial appeal period.

Sincerely,



Edwin C. Bakowski, P.E.
Manager, Permit Section
Bureau of Land

AP
ECB:MAS:bjh\973012S.WPD

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

July 1, 1979

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 Divisions of Water Pollution Control, Air Pollution Control, Public Water Supplies, and Land and Noise Pollution Control. Special conditions may also be imposed by the separate divisions 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, emission 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.



8112

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 North Grand Avenue East, P.O. Box 19276, Springfield, Illinois 62794-9276

Mary A. Gade, Director

217/524-3300

July 31, 1998

CERTIFIED MAIL

P 344 292 513

P 344 292 514

P 344 292 515

OWNER - Property

Village of Robbins
3327 W. 137th Street
Robbins, Illinois 60472

OWNER - Facility

Robbins Resource Recovery Partners, L.P.
Perryville Corporate Park
Clinton, New Jersey 08809-4000

OPERATOR

Foster Wheeler Illinois, Inc.
13400 South Kedzie Avenue
Robbins, Illinois 60472

Re: 0312700001 -- Cook County

Robbins Resource Recovery

Permit No. 1990-068-DE

Permit No. 1997-072-OP

Supplemental Permit 1998-208-OP/SUP

Log No. 1998-208, (1998-078, 1998-038, 1998-030, 1997-072, 1994-300, 1989-189)

State Permit File

Gentlemen:

This supplemental permit is hereby granted to Village of Robbins as property owner, Robbins Resource Recovery Partners, L.P. as owner of the facility, and Foster Wheeler Illinois, Inc. as the operator to modify the operation of the solid waste management site to allow operation of a portable conveyor, two discharge hoppers and two modified conveyors which were authorized for construction in supplemental permits 1998-078-DE and 1998-030-DE. The site consists of a 16 acre site in the Village of Robbins, Cook County, Illinois.

All plans, specifications, application and supporting documents as submitted and approved shall constitute part of this permit and are identified on the records of the Illinois Environmental Protection Agency, Division of Land Pollution Control by the permit number(s) and log number(s) designated in the heading above.

The permit is issued subject to the standard conditions attached hereto and incorporated herein by reference, and further subject to the following special conditions:

1. This permit allows for the operation of the units listed below.

SCREENED
MM

<u>Unit Designation</u>	<u>Approximate Size</u>	<u>Proposed Use</u>
a. Tipping area	3000 ton capacity	storage of waste prior to processing
b. Portable shredder	5 tons per hour.	to shred bulky waste
c. Processing Lines (2)	80 to 100 tons per hour	
i. primary trommel		screening of waste
ii. shredder		shreds wastes over 5 inches in size
iii. magnets (7)		to remove ferrous material
iv. secondary trommel		separation of waste into sizes
v. air classifier		removal of inert material
vi. eddy current separator		to remove aluminum cans
vii. picking station		to remove unacceptable material for waste removal and recovery of recyclable materials
viii. glass and compost recovery system		to separate organic material from the glass material
d. Circulating fluidized bed boiler trains (2)	600 ton per day (ave.)	

- | | | | |
|------|---|---|---|
| i. | combustion chamber | | waste to energy |
| ii. | cyclone | | to remove entrained material |
| iii. | a superheater | | to raise steam temperature above saturation |
| iv. | economizers | | preheat boiler feedwater |
| v. | urea injection | | to control NO _x emissions |
| e. | Spray dryer absorber baghouse system (2) | size to handle approximately 85,500 SCFM each | to remove acid gases and particulate |
| f. | Ash storage silos (2) | | storage of ash prior to disposal |
| g. | Ash conditioner | | mixes water with ash to control dust |
| h. | RDF storage building | 3000 ton capacity | storage of RDF prior to burning |
| i. | All corresponding sumps, pumps, piping, controls, loading and unloading areas and appurtenances | | |

2. The Permittee may accept waste at the facility during periods of curtailed facility operations under the following conditions:

- a. During the first 14 days of curtailed operations waste may be accepted normally;
- b. After fourteen days:

- i. if one incinerator is in service, no more than 1120 tons per day (nominal) of waste may be accepted unless the excess amount can be processed or stored on site; and
 - ii. if both incinerators are out of service, no waste may be accepted until one incinerator is placed back in service.
- c. Notwithstanding the above, the Permittee may accept waste for additional periods during extended curtailed facility operations caused by unusual circumstances only as approved in writing by the Illinois EPA.
3. This facility shall not accept special waste (i.e., hazardous waste, potentially infectious medical waste, pollution control waste or industrial process waste). Special waste does not include uncontaminated corrugated cardboard, wooden crates and pallets, plastics (both packaging and rigid materials), office waste (primarily paper and plastic) and cafeteria waste.
4. Special wastes (incinerator ash) generated at the site sent for disposal, storage, incineration or further treatment elsewhere shall be transported to the receiving facility utilizing the Illinois EPA's supplemental permit system and manifest system. The receiving state's manifest if required may be used in place of an Illinois manifest.
5. A copy of all records and reports required by this permit shall be maintained in the facility's operating record. The operating record shall be made available by the Illinois EPA upon request. All information shall be maintained in the record for a period of at least three years beyond the date of the report.
6. The following information shall be included in the operating record and recorded daily:
 - a. the amount of waste delivered,
 - b. the amount of RDF produced (as calculated),
 - c. the amount of waste rejected,
 - d. the amount of unacceptable waste removed,
 - e. the amount of materials recovered (e.g., Fe, Al, glass),
 - f. the amount of bottom and fly ash removed,
 - g. where the above materials were taken to, and
 - h. the date and time any event results in the bypassing of the air pollution equipment,
 - i. an inspection certification. The operator shall certify daily that all incoming railroad ties were visually inspected.
7. On an annual basis, the Permittee shall familiarize local emergency response units with the contingency plan and document the date, time and contents of meetings held to comply with these requirements.

8. This permit is subject to review and modification by the Illinois EPA as deemed necessary to fulfill the intent and purpose of the Environmental Protection Act and all applicable environmental rules and regulations.
9. The Permittee shall notify the Illinois EPA of any changes from the information submitted to the Illinois EPA in its application for a development and operating permit for this site. Any modifications to the facilities shall be the subject of an application or supplement permit submitted to the Illinois EPA for those changes.
10. The incinerator ash destined for disposal shall be disposed of only in a properly permitted landfill.
11. All of the ash meets the definition of an industrial process waste and the fly ash portion is also considered a pollution control waste. The Permittee shall establish a reliable method of determining the amount of fly ash sent for disposal.
12. The Permittee shall submit a quarterly report to the Solid Waste Management Section, Division of Land Pollution Control which summarizes the amount of industrial process waste and pollution control waste for purposes of the solid waste fee system. The portion which is a pollution control waste will be exempt from fees.
13. The Permittee shall collect a weekly grab sample of the incinerator ash. The results from the analysis shall be made a part of the operating record. The weekly samples shall be composited quarterly and analyzed for the characteristics of a hazardous waste by TCLP as described in 35 Ill. Adm. Code 721.124 for the parameters; arsenic, barium, cadmium, chromium, lead, mercury, selenium and silver.
14. The following conditions are included pursuant to Section 22.16b(b):
 - a. The incinerator must be designed to provide continuous monitoring while in operation, with direct transmission of the resultant data to the Illinois EPA, until the Illinois EPA determines the best available control technology for monitoring the data. The Illinois EPA shall establish the test methods, procedures and averaging periods, as certified by the form and frequency of report containing results of the monitoring. Compliance and enforcement shall be based on such reports. Copies of the results of such monitoring shall be maintained on file at the facility concerned for one year, and copies shall be made available for inspection and copying by interested members of the public during business hours.

Also, please refer to operating permit 8812055 issued by the Illinois EPA's Bureau of Air.

- b. The facility shall comply with the emission limits adopted by the Illinois EPA under subsection (c).

Also, please refer to operating permit 8812055 issued by the Illinois EPA's Bureau of Air.

- c. The operator of the facility shall take reasonable measures to ensure that waste accepted for incineration complies with all legal requirements for incineration. The incinerator operator shall establish contractual requirements or other notification and inspection procedures sufficient to assure compliance with this subsection (b)(3) which may include, but not be limited to, routine inspections of waste, lists of acceptable and unacceptable waste provided to haulers and notification to the Agency when the facility operator reject and sends loads away. The notification shall contain at least the name of the hauler and the site from where the load was hauled.

Also, please refer to Special Condition Nos. 15, 16 and 21 herein.

- d. The operator may not accept for incineration any waste generated or collected in a municipality that has not implemented a recycling plan or is party to an implemented county plan, consistent with State goals and objectives. Such plans shall include provisions for collecting, recycling or diverting from landfills and municipal incinerators landscape waste, household hazardous waste and batteries. Such provisions may be performed at the site of the new municipal incinerator.

Also, please refer to Special Condition No. 18 and 19, herein.

- 15. Waste may be received for segregation into waste categories, one of which will be incinerated on site and the other sent off-site. The Permittee shall not accept waste which does not comply with the waste screening/analysis plan in the approved application Section 9.4 and Special Condition #3 herein. The procedures shall be modified to include screening for all unacceptable or prohibited waste and comply with the following conditions:

- a. Upon unloading, the Permittee shall inspect each incoming load of waste to determine if the load contains waste which this facility is not permitted to receive in accordance with the procedures in the approved permit application Log 1989-189.
- b. The Permittee shall inspect all wastes prior to placement into the incinerator feed system to remove waste which is unacceptable for incineration. If unacceptable waste is discovered, it shall be diverted from the incinerator feed and transported to a unit which is properly permitted to receive the waste.
- c. The Permittee shall notify the Illinois EPA in writing within 48 hours of rejection of a load of unacceptable waste as described in the facilities waste inspection/analysis plan.

The notification shall include at least the name of the hauler and site from where the load was hauled.

- d. The Permittee shall visually inspect wastes which are processed to become part of the refuse derived fuel (RDF) system to remove wastes identified as prohibited waste in the Waste Management Practice Plan. Such wastes shall include but not be limited to:
 1. explosives or ammunitions,
 2. combustible liquids or gas containers, bottles or cylinders or cans,
 3. batteries of any type including dry cell, wet cell, motor vehicle or marine,
 4. special wastes (i.e., industrial process waste, hazardous waste, pollution control waste or potentially infectious waste),
 5. radioactive wastes,
 6. asbestos wastes,
 7. waste regulated by the Toxic Substance Control Act,
 8. landscape waste,
 9. household hazardous waste,
 10. railroad ties treated with a material other than creosote,
 11. telephone poles, and
 12. tires.
 - e. The Permittee shall provide a list of wastes which are unacceptable for receipt at this facility and list of examples of acceptable waste to each hauler before the hauler collects waste for transport to this facility.
16. The Permittee shall visually inspect used creosote-treated wood to verify that the wood is weathered and contains no surface deposits or stains. Unweathered wood, or wood which contains surface staining or deposits, is subject to the requirements of 35 Ill. Adm. Code 722.111 (by testing) to verify the wood is not characteristically hazardous.
 17. Waste generated in Illinois municipalities and Illinois counties outside of Hamilton County, Illinois as of June 2, 1997 are deemed to have complied with the requirements in Special Condition 14(d) and no further documentation is required. Provisions for collecting, recycling or diverting from landfills and municipal incinerators landscape waste, household hazardous waste and batteries may be performed at this site may be used to comply with these requirements.
 18. Prior to receipt of waste from out-of-state or Hamilton County, Illinois, the Permittee shall obtain a certification from the hauler that the waste was generated or collected in a municipality that has provisions for collecting, recycling or diverting household hazardous waste from landfills and municipal incinerators.

19. The facility shall perform routine housekeeping as outlined in Section 9.3.2 of the approved application Log #1989-189, to control litter. Routine housekeeping measures at a minimum shall include:
 - a. inspection and maintenance of the equipment in accordance with the manufacturer's recommendations;
 - b. periodic sweeping and cleaning of tipping floor, RDF residue loading area, and bottom and fly ash loading area;
 - c. daily janitorial cleaning of administrative office, sanitary and employee facilities, and control room;
 - d. periodic sweeping and cleaning of floors in RDF production area and boiler building;
 - e. periodic cleaning of turbine generator room;
 - f. daily inspection and cleanup of yard area from spillage, litter, and other foreign materials;
 - g. weekly cleaning and inspection of maintenance areas for orderliness and safety compliance with industrial standards;
 - h. weekly inspection and cleaning of drainage basins, oil-water separators, sumps, etc.
 - i. weekly fire and safety inspections.

The time and results date of each inspection shall be maintained in the operating record.

20. The facility shall be maintained and operated to prevent nuisance odors and litter outside the building by drawing air from inside the waste receiving, RDF processing and RDF storage buildings for combustion air in the combustors (or venting air through the combustors when they are not operational) and other necessary measures. Any litter present outside of the building shall be collected daily.
21. The load checking program shall consist of, at a minimum, the following components:
 - 1) Random inspections
 - A. An inspector designated by the facility shall examine at least three random loads of solid waste delivered to the landfill on a random day each week. The drivers randomly selected by the inspector shall be directed to discharge their loads at a

separate, designated location within the facility. The facility shall conduct a detailed inspection of the discharged material for any regulated hazardous or other unacceptable wastes that may be present. Cameras or other devices may be used to record the visible contents of solid waste shipments. Where such devices are employed, their use should be designated on a sign posted near the entrance of the facility.

- B. If regulated hazardous wastes or other unacceptable wastes are suspected, the facility shall communicate with the generator, hauler or other party responsible for shipping the waste to the facility to determine the identity of the waste.

2) Recording inspection results

Information and observations derived from each random inspection shall be recorded in writing and retained at the facility for at least three years. The recorded information shall include, at a minimum the date and time of the inspection; the names of the hauling firm and the driver of the vehicle; the vehicle license plate number; the source of the waste, as stated by the driver; and observations made by the inspector during the detailed inspection. The written record shall be signed by both the inspector and the driver.

The "security wastes" are excluded from the random inspection program.

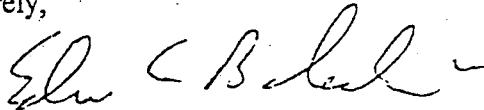
- 22. The permittee shall transport the compostable waste stream to a properly permitted facility. The only facilities in Illinois which may receive this waste stream for composting are mixed municipal waste composting facilities. If the compostable stream includes landscape waste that is not separated at the point of generation and collected and processed separately from the rest of the municipal waste stream, it is subject to the disposal prohibitions in Section 22.22(c) of the Environmental Protection Act.
- 23. The Permittee(s) shall notify the Illinois EPA's Bureau of Land in writing of its intent to close at least 45 days prior to the date closure is expected to begin. Along with this notification, the Permittee(s) shall submit the procedure and the sampling and analysis plan to be used in demonstrating the area has been properly decontaminated. This plan shall be approved by the Illinois EPA's Bureau of Land in writing prior to being implemented.
- 24. The operator shall notify the Illinois EPA within 30 days after receiving the final volume of waste.
- 25. The operator shall initiate implementation of the closure plan within 30 days after the site receives its final volume of waste.

26. The operator shall not file any application to modify the closure plan less than 180 days prior to receipt of the final volume of waste.
27. Upon completion of closure activities, the operator will 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 Completion of Closure of Non-Hazardous Waste Facilities."
28. The Permittee is prohibited from placing white goods in the shredder unless the white goods components have been removed.
29. The Permittee may only burn waste that has been processed into RDF on site except for those wastes identified as "security waste". A security waste is defined as municipal waste where the origin or circumstances effectively exclude the presence of undesirable components, such as household batteries; preclude recycling of the material; and generally assure that the waste is of a specific character or nature, as certified by the generator of the waste and verified by the Permittee. Examples of security wastes include garbage from international airline flights, which must be incinerated pursuant to US Department of Agriculture Rules, and bank or medical records, which must be destroyed to maintain client/patient privacy. Security wastes must be managed in compliance with the following conditions:
 - a. The constituents in security waste must be readily identified by visual inspection notwithstanding any shredding or size reduction performed off-site;
 - b. The Permittee shall implement practices for handling of security waste at the facility that reasonably provide for identification and removal of any prohibited materials in the waste. At a minimum, these procedures shall include continuous oversight of each shipment of security waste at the facility by designated facility personnel until unloading is complete and the waste is mixed with other waste or RDF; and
 - c. The Permittee shall maintain records for each source and type of security waste accepted by the facility and confirm that such waste is properly considered security waste and define the specific practices established for handling such waste at the facility, accompanied by reasonable supporting documentation and explanation. The Permittee shall also maintain records for each shipment of security waste that is received at the facility that include the date, time, waste source, hauler, type and amount of waste for the shipment and that document implementation of the specified handling procedures by the facility, including the names and personnel of supervising the handling of the shipment.
30. Only "security waste" as defined in condition no. 29 and railroad ties may be placed into the portable conveyor device.

Page 11

Within 35 days after the date of mailing of the Illinois EPA's final decision, the applicant may petition for a hearing before the Illinois Pollution Control Board to contest the decision of the Illinois EPA, however, the 35-day period for petitioning for a hearing may be extended for a period of time not to exceed 90 days by written notice provided to the Board from the applicant and the Illinois EPA within the 35-day initial appeal period.

Sincerely,



Edwin C. Bakowski, P.E.
Manager, Permit Section
Bureau of Land

ECB:MAS:bjh⁷⁰973012S.WPD

bcc: Bureau File
Maywood Region
DLC- Kyle Davis
Ted Dragovich
Dennis McMurray
Don Sutton
Mark Schollenberger

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

July 1, 1979

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 Divisions of Water Pollution Control, Air Pollution Control, Public Water Supplies, and Land and Noise Pollution Control. Special conditions may also be imposed by the separate divisions 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, emission 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.



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276

THOMAS V. SKINNER, DIRECTOR

217/524-3300

June 10, 1999

CERTIFIED MAIL

P 344 301 927

P 344 301 928

P 344 301 929

OWNER - Property
Village of Robbins
3327 W. 137th Street
Robbins, Illinois 60472

OWNER - Facility
Robbins Resource Recovery Partners, L.P.
Perryville Corporate Park
Clinton, New Jersey 08809-4000

OPERATOR
Foster Wheeler Illinois, Inc.
13400 South Kedzie Avenue
Robbins, Illinois 60472

Re: 0312700001 -- Cook County
Robbins Resource Recovery
Permit No. 1990-068-DE
Permit No. 1997-072-OP
Supplemental Permit 1998-314-DE/SUP
Log Nos. 1998-314, 1998-409, (1998-208, 1998-078, 1998-038, 1998-030, 1997-072, 1994-300, 1989-189)
State Permit File

Gentlemen:

This supplemental permit is hereby granted to Village of Robbins as property owner, Robbins Resource Recovery Partners, L.P. as owner of the facility, and Foster Wheeler Illinois, Inc. as the operator to modify the operation of the solid waste management site by modifying the conveyors for the trommel system (Log No. 1998-314) and installing (development only) an emergency feedwater pump (Log No. 1998-409). The site consists of a 16 acre site in the Village of Robbins, Cook County, Illinois.

All plans, specifications, application and supporting documents as submitted and approved shall constitute part of this permit and are identified on the records of the Illinois Environmental Protection Agency, Division of Land Pollution Control by the permit number(s) and log number(s) designated in the heading above.

The permit is issued subject to the standard conditions attached hereto and incorporated herein by reference, and further subject to the following special conditions:

1. This permit allows for the operation of the units listed below.

<u>Unit Designation</u>	<u>Approximate Size</u>	<u>Proposed Use</u>
a. Tipping area	3000 ton capacity	storage of waste prior to processing
b. Portable shredder	5 tons per hour.	to shred bulky waste
c. Processing Lines (2)	80 to 100 tons per hour	
i. primary trommel		screening of waste
ii. shredder		shreds wastes over 5 inches in size
iii. magnets (7)		to remove ferrous material
iv. secondary trommel		separation of waste into sizes
v. air classifier		removal of inert material
vi. eddy current separator		to remove aluminum cans
vii. picking station		to remove unacceptable material for waste removal and recovery of recyclable materials
viii. glass and compost recovery system		to separate organic material from the glass material

- | | | | |
|------|---|---|---|
| d. | Circulating fluidized bed boiler trains (2) | 600 ton per day (ave.) | |
| i. | combustion chamber | | waste to energy |
| ii. | cyclone | | to remove entrained material |
| iii. | a superheater | | to raise steam temperature above saturation |
| iv. | economizers | | preheat boiler feedwater |
| v. | urea injection | | to control NO _x emissions |
| e. | Spray dryer absorber baghouse system (2) | size to handle approximately 85,500 SCFM each | to remove acid gases and particulate |
| f. | Ash storage silos (2) | | storage of ash prior to disposal |
| g. | Ash conditioner | | mixes water with ash to control dust |
| h. | RDF storage building | 3000 ton capacity | storage of RDF prior to burning |
| i. | All corresponding sumps, pumps, piping, controls, loading and unloading areas and appurtenances | | |

2. The Permittee may only develop (install) the emergency feedwater pump. Units authorized for development only may not be placed into operation until an operating permit for these units is granted by the Bureau of Land.
3. The Permittee may accept waste at the facility during periods of curtailed facility operations under the following conditions:

- a. During the first 14 days of curtailed operations waste may be accepted normally;
 - b. After fourteen days:
 - i. if one incinerator is in service, no more than 1120 tons per day (nominal) of waste may be accepted unless the excess amount can be processed or stored on site; and
 - ii. if both incinerators are out of service, no waste may be accepted until one incinerator is placed back in service.
 - c. Notwithstanding the above, the Permittee may accept waste for additional periods during extended curtailed facility operations caused by unusual circumstances only as approved in writing by the Illinois EPA.
4. This facility shall not accept special waste (i.e., hazardous waste, potentially infectious medical waste, pollution control waste or industrial process waste). Special waste does not include uncontaminated corrugated cardboard, wooden crates and pallets, plastics (both packaging and rigid materials), office waste (primarily paper and plastic) and cafeteria waste.
 5. Special wastes (incinerator ash) generated at the site sent for disposal, storage, incineration or further treatment elsewhere shall be transported to the receiving facility utilizing the Illinois EPA's supplemental permit system and manifest system. The receiving state's manifest if required may be used in place of an Illinois manifest.
 6. A copy of all records and reports required by this permit shall be maintained in the facility's operating record. The operating record shall be made available by the Illinois EPA upon request. All information shall be maintained in the record for a period of at least three years beyond the date of the report.
 7. The following information shall be included in the operating record and recorded daily:
 - a. the amount of waste delivered,
 - b. the amount of RDF produced (as calculated),
 - c. the amount of waste rejected,
 - d. the amount of unacceptable waste removed,
 - e. the amount of materials recovered (e.g., Fe, Al, glass),
 - f. the amount of bottom and fly ash removed,
 - g. where the above materials were taken to, and
 - h. the date and time any event results in the bypassing of the air pollution equipment,
 - i. an inspection certification. The operator shall certify daily that all incoming railroad ties were visually inspected.

8. On an annual basis, the Permittee shall familiarize local emergency response units with the contingency plan and document the date, time and contents of meetings held to comply with these requirements.
9. This permit is subject to review and modification by the Illinois EPA as deemed necessary to fulfill the intent and purpose of the Environmental Protection Act and all applicable environmental rules and regulations.
10. The Permittee shall notify the Illinois EPA of any changes from the information submitted to the Illinois EPA in its application for a development and operating permit for this site. Any modifications to the facilities shall be the subject of an application or supplement permit submitted to the Illinois EPA for those changes.
11. The incinerator ash destined for disposal shall be disposed of only in a properly permitted landfill.
12. All of the ash meets the definition of an industrial process waste and the fly ash portion is also considered a pollution control waste. The Permittee shall establish a reliable method of determining the amount of fly ash sent for disposal.
13. The Permittee shall submit a quarterly report to the Solid Waste Management Section, Division of Land Pollution Control which summarizes the amount of industrial process waste and pollution control waste for purposes of the solid waste fee system. The portion which is a pollution control waste will be exempt from fees.
14. The Permittee shall collect a weekly grab sample of the incinerator ash. The results from the analysis shall be made a part of the operating record. The weekly samples shall be composited quarterly and analyzed for the characteristics of a hazardous waste by TCLP as described in 35 Ill. Adm. Code 721.124 for the parameters; arsenic, barium, cadmium, chromium, lead, mercury, selenium and silver.
15. The following conditions are included pursuant to Section 22.16b(b):
 - a. The incinerator must be designed to provide continuous monitoring while in operation, with direct transmission of the resultant data to the Illinois EPA, until the Illinois EPA determines the best available control technology for monitoring the data. The Illinois EPA shall establish the test methods, procedures and averaging periods, as certified by the form and frequency of report containing results of the monitoring. Compliance and enforcement shall be based on such reports. Copies of the results of such monitoring shall be maintained on file at the facility concerned for one year, and copies shall be made available for inspection and copying by interested members of the public during business hours.

Also, please refer to operating permit 8812055 issued by the Illinois EPA's Bureau of Air.

- b. The facility shall comply with the emission limits adopted by the Illinois EPA under subsection (c).

Also, please refer to operating permit 8812055 issued by the Illinois EPA's Bureau of Air.

- c. The operator of the facility shall take reasonable measures to ensure that waste accepted for incineration complies with all legal requirements for incineration. The incinerator operator shall establish contractual requirements or other notification and inspection procedures sufficient to assure compliance with this subsection (b)(3) which may include, but not be limited to, routine inspections of waste, lists of acceptable and unacceptable waste provided to haulers and notification to the Agency when the facility operator reject and sends loads away. The notification shall contain at least the name of the hauler and the site from where the load was hauled.

Also, please refer to Special Condition Nos. 16, 17 and 22 herein.

- d. The operator may not accept for incineration any waste generated or collected in a municipality that has not implemented a recycling plan or is party to an implemented county plan, consistent with State goals and objectives. Such plans shall include provisions for collecting, recycling or diverting from landfills and municipal incinerators landscape waste, household hazardous waste and batteries. Such provisions may be performed at the site of the new municipal incinerator.

Also, please refer to Special Condition No. 19 and 20, herein.

- 16. Waste may be received for segregation into waste categories, one of which will be incinerated on site and the other sent off-site. The Permittee shall not accept waste which does not comply with the waste screening/analysis plan in the approved application Section 9.4 and Special Condition #4 herein. The procedures shall be modified to include screening for all unacceptable or prohibited waste and comply with the following conditions:
 - a. Upon unloading, the Permittee shall inspect each incoming load of waste to determine if the load contains waste which this facility is not permitted to receive in accordance with the procedures in the approved permit application Log 1989-189.
 - b. The Permittee shall inspect all wastes prior to placement into the incinerator feed system to remove waste which is unacceptable for incineration. If unacceptable waste is discovered, it shall be diverted from the incinerator feed and transported to a unit which is properly permitted to receive the waste.

- c. The Permittee shall notify the Illinois EPA in writing within 48 hours of rejection of a load of unacceptable waste as described in the facilities waste inspection/analysis plan. The notification shall include at least the name of the hauler and site from where the load was hauled.
 - d. The Permittee shall visually inspect wastes which are processed to become part of the refuse derived fuel (RDF) system to remove wastes identified as prohibited waste in the Waste Management Practice Plan. Such wastes shall include but not be limited to:
 - 1. explosives or ammunitions,
 - 2. combustible liquids or gas containers, bottles or cylinders or cans,
 - 3. batteries of any type including dry cell, wet cell, motor vehicle or marine,
 - 4. special wastes (i.e., industrial process waste, hazardous waste, pollution control waste or potentially infectious waste),
 - 5. radioactive wastes,
 - 6. asbestos wastes,
 - 7. waste regulated by the Toxic Substance Control Act,
 - 8. landscape waste,
 - 9. household hazardous waste,
 - 10. railroad ties treated with a material other than creosote,
 - 11. telephone poles, and
 - 12. tires.
 - e. The Permittee shall provide a list of wastes which are unacceptable for receipt at this facility and list of examples of acceptable waste to each hauler before the hauler collects waste for transport to this facility.
17. The Permittee shall visually inspect used creosote-treated wood to verify that the wood is weathered and contains no surface deposits or stains. Unweathered wood, or wood which contains surface staining or deposits, is subject to the requirements of 35 Ill. Adm. Code 722.111 (by testing) to verify the wood is not characteristically hazardous.
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20. The facility shall perform routine housekeeping as outlined in Section 9.3.2 of the approved application Log #1989-189, to control litter. Routine housekeeping measures at a minimum shall include:
- a. inspection and maintenance of the equipment in accordance with the manufacturer's recommendations;
 - b. periodic sweeping and cleaning of tipping floor, RDF residue loading area, and bottom and fly ash loading area;
 - c. daily janitorial cleaning of administrative office, sanitary and employee facilities, and control room;
 - d. periodic sweeping and cleaning of floors in RDF production area and boiler building;
 - e. periodic cleaning of turbine generator room;
 - f. daily inspection and cleanup of yard area from spillage, litter, and other foreign materials;
 - g. weekly cleaning and inspection of maintenance areas for orderliness and safety compliance with industrial standards;
 - h. weekly inspection and cleaning of drainage basins, oil-water separators, sumps, etc.
 - i. weekly fire and safety inspections.

The time and results date of each inspection shall be maintained in the operating record.

21. The facility shall be maintained and operated to prevent nuisance odors and litter outside the building by drawing air from inside the waste receiving, RDF processing and RDF storage buildings for combustion air in the combustors (or venting air through the combustors when they are not operational) and other necessary measures. Any litter present outside of the building shall be collected daily.
22. The load checking program shall consist of, at a minimum, the following components:
- 1) Random inspections
 - A. An inspector designated by the facility shall examine at least three random loads of solid waste delivered to the landfill on a random day each week. The drivers randomly selected by the inspector shall be directed to discharge their loads at a

separate, designated location within the facility. The facility shall conduct a detailed inspection of the discharged material for any regulated hazardous or other unacceptable wastes that may be present. Cameras or other devices may be used to record the visible contents of solid waste shipments. Where such devices are employed, their use should be designated on a sign posted near the entrance of the facility.

- B. If regulated hazardous wastes or other unacceptable wastes are suspected, the facility shall communicate with the generator, hauler or other party responsible for shipping the waste to the facility to determine the identity of the waste.

2) Recording inspection results

Information and observations derived from each random inspection shall be recorded in writing and retained at the facility for at least three years. The recorded information shall include, at a minimum the date and time of the inspection; the names of the hauling firm and the driver of the vehicle; the vehicle license plate number; the source of the waste, as stated by the driver; and observations made by the inspector during the detailed inspection. The written record shall be signed by both the inspector and the driver.

The "security wastes" are excluded from the random inspection program.

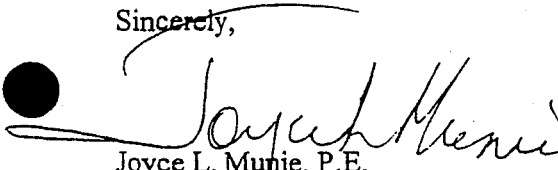
- 23. The permittee shall transport the compostable waste stream to a properly permitted facility. The only facilities in Illinois which may receive this waste stream for composting are mixed municipal waste composting facilities. If the compostable stream includes landscape waste that is not separated at the point of generation and collected and processed separately from the rest of the municipal waste stream, it is subject to the disposal prohibitions in Section 22.22(c) of the Environmental Protection Act.
- 24. The Permittee(s) shall notify the Illinois EPA's Bureau of Land in writing of its intent to close at least 45 days prior to the date closure is expected to begin. Along with this notification, the Permittee(s) shall submit the procedure and the sampling and analysis plan to be used in demonstrating the area has been properly decontaminated. This plan shall be approved by the Illinois EPA's Bureau of Land in writing prior to being implemented.
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- 26. The operator shall initiate implementation of the closure plan within 30 days after the site receives its final volume of waste.

27. The operator shall not file any application to modify the closure plan less than 180 days prior to receipt of the final volume of waste.
28. Upon completion of closure activities, the operator will 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 Completion of Closure of Non-Hazardous Waste Facilities."
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30. The Permittee may only burn waste that has been processed into RDF on site except for those wastes identified as "security waste". A security waste is defined as municipal waste where the origin or circumstances effectively exclude the presence of undesirable components, such as household batteries; preclude recycling of the material; and generally assure that the waste is of a specific character or nature, as certified by the generator of the waste and verified by the Permittee. Examples of security wastes include garbage from international airline flights, which must be incinerated pursuant to US Department of Agriculture Rules, and bank or medical records, which must be destroyed to maintain client/patient privacy. Security wastes must be managed in compliance with the following conditions:
 - a. The constituents in security waste must be readily identified by visual inspection notwithstanding any shredding or size reduction performed off-site;
 - b. The Permittee shall implement practices for handling of security waste at the facility that reasonably provide for identification and removal of any prohibited materials in the waste. At a minimum, these procedures shall include continuous oversight of each shipment of security waste at the facility by designated facility personnel until unloading is complete and the waste is mixed with other waste or RDF; and
 - c. The Permittee shall maintain records for each source and type of security waste accepted by the facility and confirm that such waste is properly considered security waste and define the specific practices established for handling such waste at the facility, accompanied by reasonable supporting documentation and explanation. The Permittee shall also maintain records for each shipment of security waste that is received at the facility that include the date, time, waste source, hauler, type and amount of waste for the shipment and that document implementation of the specified handling procedures by the facility, including the names and personnel of supervising the handling of the shipment.
31. Only "security waste" as defined in condition No. 30 and railroad ties may be placed into the portable conveyor device.

Within 35 days after the date of mailing of the Illinois EPA's final decision, the applicant may petition for a hearing before the Illinois Pollution Control Board to contest the decision of the Illinois EPA, however, the 35-day period for petitioning for a hearing may be extended for a period of time not to exceed 90 days by written notice provided to the Board from the applicant and the Illinois EPA within the 35-day initial appeal period.

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,



Joyce L. Munie, P.E.
Manager, Solid Waste Branch
Permit Section
Bureau of Land

^{ESD}
JLM:MAS:bjh\992052S.WPD

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

July 1, 1979

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 Division of Water Pollution Control, Air Pollution Control, Public Water Supplies, and Land and Noise Pollution Control. Special conditions may also be imposed by the separate divisions 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.



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276

THOMAS V. SKINNER, DIRECTOR

217/524-3300

October 14, 1999

CERTIFIED MAIL

Z 416 153 195

Z 416 153 196

Z 416 153 197

OWNER - Property

Village of Robbins
3327 W. 137th Street
Robbins, Illinois 60472

OWNER - Facility

Robbins Resource Recovery Partners, L.P.
Perryville Corporate Park
Clinton, New Jersey 08809-4000

OPERATOR

Foster Wheeler Illinois, Inc.
13400 South Kedzie Avenue
Robbins, Illinois 60472

Re: 0312700001 -- Cook County

Robbins Resource Recovery

Permit No. 1990-068-DE

Permit No. 1997-072-OP

Supplemental Permit 1998-313-DE/SUP

Log Nos. 1998-313, 1998-315, 1998-410, (1998-314, 1998-409, 1998-208, 1998-078, 1998-038, 1998-030, 1997-072, 1994-300, 1989-189)

State Permit File

Gentlemen:

This supplemental permit is hereby granted to Village of Robbins as property owner, Robbins Resource Recovery Partners, L.P. as owner of the facility, and Foster Wheeler Illinois, Inc. as the operator to modify the operation of the solid waste management site to allow the construction and operation of the boiler return recirculation conveyors (Log No. 1998-313), the dry ash loadout system (Log No. 1998-315) and four (4) new conveyors for transferring bottom ash from the boiler building to the ash loadout building (Log No. 1998-410). The site consists of a 16 acre site in the Village of Robbins, Cook County, Illinois.

All plans, specifications, application and supporting documents as submitted and approved shall constitute part of this permit and are identified on the records of the Illinois Environmental Protection Agency, Division of Land Pollution Control by the permit number(s) and log number(s) designated in the heading above.

The permit is issued subject to the standard conditions attached hereto and incorporated herein by reference, and further subject to the following special conditions:

SCREEN MED

1. This permit allows for the operation of the units listed below.

<u>Unit Designation</u>	<u>Approximate Size</u>	<u>Proposed Use</u>
a. Tipping area	3000 ton capacity	storage of waste prior to processing
b. Portable shredder	5 tons per hour.	to shred bulky waste
c. Processing Lines (2)	80 to 100 tons per hour	
i. primary trommel		screening of waste
ii. shredder		shreds wastes over 5 inches in size
iii. magnets (7)		to remove ferrous material
iv. secondary trommel		separation of waste into sizes
v. air classifier		removal of inert material
vi. eddy current separator		to remove aluminum cans
vii. picking station		to remove unacceptable material for waste removal and recovery of recyclable materials
viii. glass and compost recovery system		to separate organic material from the glass material

- | | | | |
|------|---|---|---|
| d. | Circulating fluidized bed boiler trains (2) | 600 ton per day (ave.) | |
| i. | combustion chamber | | waste to energy |
| ii. | cyclone | | to remove entrained material |
| iii. | a superheater | | to raise steam temperature above saturation |
| iv. | economizers | | preheat boiler feedwater |
| v. | urea injection | | to control NO _x emissions |
| e. | Spray dryer absorber baghouse system (2) | size to handle approximately 85,500 SCFM each | to remove acid gases and particulate |
| f. | Ash storage silos (2) | | storage of ash prior to disposal |
| g. | Ash conditioner | | mixes water with ash to control dust |
| h. | RDF storage building | 3000 ton capacity | storage of RDF prior to burning |
| i. | All corresponding sumps, pumps, piping, controls, loading and unloading areas and appurtenances | | |

2. The Permittee may develop the following units:

- a. an emergency feedwater pump

Units authorized for development only may not be placed into operation until an operating permit for these units is granted by the Bureau of Land.

3. The Permittee may accept waste at the facility during periods of curtailed facility operations under the following conditions:
 - a. During the first 14 days of curtailed operations waste may be accepted normally;
 - b. After fourteen days:
 - i. if one incinerator is in service, no more than 1120 tons per day (nominal) of waste may be accepted unless the excess amount can be processed or stored on site; and
 - ii. if both incinerators are out of service, no waste may be accepted until one incinerator is placed back in service.
 - c. Notwithstanding the above, the Permittee may accept waste for additional periods during extended curtailed facility operations caused by unusual circumstances only as approved in writing by the Illinois EPA.
4. This facility shall not accept special waste (i.e., hazardous waste, potentially infectious medical waste, pollution control waste or industrial process waste). Special waste does not include uncontaminated corrugated cardboard, wooden crates and pallets, plastics (both packaging and rigid materials), office waste (primarily paper and plastic) and cafeteria waste.
5. Special wastes (incinerator ash) generated at the site sent for disposal, storage, incineration or further treatment elsewhere shall be transported to the receiving facility utilizing the Illinois EPA's supplemental permit system and manifest system. The receiving state's manifest if required may be used in place of an Illinois manifest.
6. A copy of all records and reports required by this permit shall be maintained in the facility's operating record. The operating record shall be made available by the Illinois EPA upon request. All information shall be maintained in the record for a period of at least three years beyond the date of the report.
7. The following information shall be included in the operating record and recorded daily:
 - a. the amount of waste delivered,
 - b. the amount of RDF produced (as calculated),
 - c. the amount of waste rejected,
 - d. the amount of unacceptable waste removed,

- e. the amount of materials recovered (e.g., Fe, Al, glass),
 - f. the amount of bottom and fly ash removed,
 - g. where the above materials were taken to, and
 - h. the date and time any event results in the bypassing of the air pollution equipment,
 - i. an inspection certification. The operator shall certify daily that all incoming railroad ties were visually inspected.
8. On an annual basis, the Permittee shall familiarize local emergency response units with the contingency plan and document the date, time and contents of meetings held to comply with these requirements.
 9. This permit is subject to review and modification by the Illinois EPA as deemed necessary to fulfill the intent and purpose of the Environmental Protection Act and all applicable environmental rules and regulations.
 10. The Permittee shall notify the Illinois EPA of any changes from the information submitted to the Illinois EPA in its application for a development and operating permit for this site. Any modifications to the facilities shall be the subject of an application or supplement permit submitted to the Illinois EPA for those changes.
 11. The incinerator ash destined for disposal shall be disposed of only in a properly permitted landfill.
 12. All of the ash meets the definition of an industrial process waste and the fly ash portion is also considered a pollution control waste. The Permittee shall establish a reliable method of determining the amount of fly ash sent for disposal.
 13. The Permittee shall submit a quarterly report to the Solid Waste Management Section, Division of Land Pollution Control which summarizes the amount of industrial process waste and pollution control waste for purposes of the solid waste fee system. The portion which is a pollution control waste will be exempt from fees.
 14. The Permittee shall collect a weekly grab sample of the incinerator ash. The results from the analysis shall be made a part of the operating record. The weekly samples shall be composited quarterly and analyzed for the characteristics of a hazardous waste by TCLP as described in 35 Ill. Adm. Code 721.124 for the parameters; arsenic, barium, cadmium, chromium, lead, mercury, selenium and silver.
 15. The following conditions are included pursuant to Section 22.16b(b):
 - a. The incinerator must be designed to provide continuous monitoring while in operation, with direct transmission of the resultant data to the Illinois EPA, until the Illinois EPA

determines the best available control technology for monitoring the data. The Illinois EPA shall establish the test methods, procedures and averaging periods, as certified by the form and frequency of report containing results of the monitoring. Compliance and enforcement shall be based on such reports. Copies of the results of such monitoring shall be maintained on file at the facility concerned for one year, and copies shall be made available for inspection and copying by interested members of the public during business hours.

Also, please refer to operating permit 8812055 issued by the Illinois EPA's Bureau of Air.

- b. The facility shall comply with the emission limits adopted by the Illinois EPA under subsection (c).

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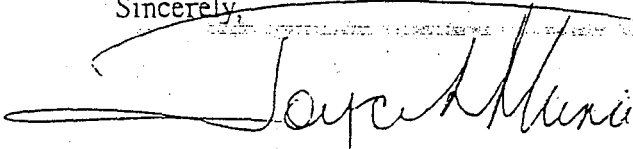
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30. The Permittee may only burn waste that has been processed into RDF on site except for those wastes identified as "security waste". A security waste is defined as municipal waste where the origin or circumstances effectively exclude the presence of undesirable components, such as household batteries; preclude recycling of the material; and generally assure that the waste is of a specific character or nature, as certified by the generator of the waste and verified by the Permittee. Examples of security wastes include garbage from international airline flights, which must be incinerated pursuant to US Department of Agriculture Rules, and bank or medical records, which must be destroyed to maintain client/patient privacy. Security wastes must be managed in compliance with the following conditions:
 - a. The constituents in security waste must be readily identified by visual inspection notwithstanding any shredding or size reduction performed off-site;
 - b. The Permittee shall implement practices for handling of security waste at the facility that reasonably provide for identification and removal of any prohibited materials in the waste. At a minimum, these procedures shall include continuous oversight of each shipment of security waste at the facility by designated facility personnel until unloading is complete and the waste is mixed with other waste or RDF; and

- c. The Permittee shall maintain records for each source and type of security waste accepted by the facility and confirm that such waste is properly considered security waste and define the specific practices established for handling such waste at the facility, accompanied by reasonable supporting documentation and explanation. The Permittee shall also maintain records for each shipment of security waste that is received at the facility that include the date, time, waste source, hauler, type and amount of waste for the shipment and that document implementation of the specified handling procedures by the facility, including the names and personnel of supervising the handling of the shipment.
31. Only "security waste" as defined in condition No. 30 and railroad ties may be placed into the portable conveyor device.
32. The permittee shall notify the Illinois EPA Maywood Field Office at 708/338-7900 upon completion of the construction activities authorized through Log Number 1998-313, 1998-315 and 1998-410 and prior to the newly constructed unit being placed into operation. If within three days after notification the permittee does not receive notice of the Illinois EPA's intent to inspect (verbal or written), prior inspection is waived and the permittee may commence operation of the unit.

Within 35 days after the date of mailing of the Illinois EPA's final decision, the applicant may petition for a hearing before the Illinois Pollution Control Board to contest the decision of the Illinois EPA, however, the 35-day period for petitioning for a hearing may be extended for a period of time not to exceed 90 days by written notice provided to the Board from the applicant and the Illinois EPA within the 35-day initial appeal period.

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,



Joyce L. Munie, P.E.
Manager, Permit Section
Bureau of Land

JLM:MAS:bjh\992052S.WPD

bcc: Bureau File
Maywood Region
DLC-Mark Gurnik, Julie Armitage
Ted Dragovich
Mark Schollenberger

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

July 1, 1979

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 Division of Water Pollution Control, Air Pollution Control, Public Water Supplies, and Land and Noise Pollution Control. Special conditions may also be imposed by the separate divisions 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.