



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276, 217-782-3397
JAMES R. THOMPSON CENTER, 100 WEST RANDOLPH, SUITE 11-300, CHICAGO, IL 60601, 312-814-6026

ROD R. BLAGOJEVICH, GOVERNOR

RENEE CIPRIANO, DIRECTOR

RECEIVED
CLERK'S OFFICE

OCT 30 2003

STATE OF ILLINOIS
Pollution Control Board

Ac 04-21

(217) 782-9817
TDD: (217) 782-9143

October 27, 2003

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

Re: Illinois Environmental Protection Agency v. RCS Inc., Jay Ross and Terry Robbins
IEPA File No. 584-03-AC; 0830250012—Jersey County

Dear Clerk Gunn:

Enclosed for filing with the Illinois Pollution Control Board, please find the original and nine true and correct copies of the Administrative Citation Package, consisting of the Administrative Citation, the inspector's Affidavit, and the inspector's Illinois Environmental Protection Agency Open Dump Inspection Checklist, issued to the above-referenced respondent(s).

On this date, a copy of the Administrative Citation Package was sent to the Respondent(s) via Certified Mail. As soon as I receive the return receipt, I will promptly file a copy with you, so that the Illinois Pollution Control Board may calculate the thirty-five (35) day appeal period for purposes of entering a default judgment in the event the Respondent(s) fails or elects not to file a petition for review contesting the Administrative Citation.

If you have any questions or concerns, please do not hesitate to contact me at the number above. Thank you for your cooperation.

Sincerely,

Michelle M. Ryan
Assistant Counsel

Enclosures

bcc: Mike Davison, Division of Land Pollution Control #24
Division of Land Pollution Control File Room #24 (Compliance File)
Jerseyville/RCS Inc., Landfill
0830250012—Jersey County
Charlie King, Collinsville Regional Office

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD
ADMINISTRATIVE CITATION

RECEIVED
CLERK'S OFFICE
OCT 30 2003

STATE OF ILLINOIS
Pollution Control Board

ILLINOIS ENVIRONMENTAL)
PROTECTION AGENCY,)
)
Complainant,)
)
v.)
)
RCS INC., JAY ROSS and)
TERRY ROBBINS)
)
Respondent.)

AC 04-21
(IEPA No.584-03-AC)

NOTICE OF FILING

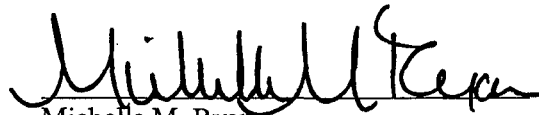
To: RCS, Inc.
12976 St. Charles Rock Road
Bridgeton, MO 64044-2418

Mr. Terry "Buck" Robbins
101 Elm Street
Chesterfield, IL 62630

Mr. Jay Ross
RCS Inc., Landfill
1336 Crystal Lake Road
Jerseyville, IL 62052

PLEASE TAKE NOTICE that on this date I mailed for filing with the Clerk of the Pollution Control Board of the State of Illinois the following instrument(s) entitled ADMINISTRATIVE CITATION, AFFIDAVIT, and OPEN DUMP INSPECTION CHECKLIST.

Respectfully submitted,


Michelle M. Ryan
Special Assistant Attorney General

Illinois Environmental Protection Agency
1021 North Grand Avenue East
P.O. Box 19276
Springfield, Illinois 62794-9276
(217) 782-5544

Dated: October 27, 2003

5. That Respondents have owned and/or operated said facility at all times pertinent hereto.

6. That on September 9, 2003, Charlie King of the Illinois Environmental Protection Agency's Springfield Regional Office inspected the above-referenced facility. A copy of his inspection report setting forth the results of said inspection is attached hereto and made a part hereof.

VIOLATIONS

Based upon direct observations made by Charlie King during the course of his September 9, 2003 inspection of the above-referenced facility, the Illinois Environmental Protection Agency has determined that Respondents violated the Illinois Environmental Protection Act (hereinafter, the "Act") as follows:

- (1) That Respondents conducted a sanitary landfill operation in a manner which resulted in uncovered refuse remaining from a previous operating day, a violation of Section 21(o)(5) of the Act, 415 ILCS 5/21(o)(5) (2002).

CIVIL PENALTY

Pursuant to Section 42(b)(4) of the Act, 415 ILCS 5/42(b)(4) (2002), Respondents are subject to a civil penalty of Five Hundred Dollars (\$500.00) for each of the violations identified above, for a total of Five Hundred Dollars (\$500.00). If Respondents elect not to petition the Illinois Pollution Control Board, the statutory civil penalty specified above shall be due and payable no later than November 30, 2003, unless otherwise provided by order of the Illinois Pollution Control Board.

If Respondents elect to contest this Administrative Citation by petitioning the Illinois Pollution Control Board in accordance with Section 31.1 of the Act, 415 ILCS 5/31.1 (2002), and if the Illinois Pollution Control Board issues a finding of violation as alleged herein, after an adjudicatory hearing, Respondents shall be assessed the associated hearing costs incurred by the Illinois Environmental

Protection Agency and the Illinois Pollution Control Board. Those hearing costs shall be assessed in addition to the statutory civil penalty.

Pursuant to Section 31.1(d)(1) of the Act, 415 ILCS 5/31.1(d)(1) (2002), if Respondents fail to petition or elect not to petition the Illinois Pollution Control Board for review of this Administrative Citation within thirty-five (35) days of the date of service, the Illinois Pollution Control Board shall adopt a final order, which shall include this Administrative Citation and a finding of violation as alleged herein, and shall impose the statutory civil penalty specified above.

When payment is made, Respondents' check shall be made payable to the Illinois Environmental Protection Trust Fund and mailed to the attention of Fiscal Services, Illinois Environmental Protection Agency, 1021 North Grand Avenue East, P.O. Box 19276, Springfield, Illinois 62794-9276. Along with payment, Respondents shall complete and return the enclosed Remittance Form to ensure proper documentation of payment.

If any civil penalty and/or hearing costs are not paid within the time prescribed by order of the Illinois Pollution Control Board, interest on said penalty and/or hearing costs shall be assessed against the Respondents from the date payment is due up to and including the date that payment is received. The Office of the Illinois Attorney General may be requested to initiate proceedings against Respondents in Circuit Court to collect said penalty and/or hearing costs, plus any interest accrued.

PROCEDURE FOR CONTESTING THIS
ADMINISTRATIVE CITATION

Respondents have the right to contest this Administrative Citation pursuant to and in accordance with Section 31.1 of the Act, 415 ILCS 5/31/1 (2002). If Respondents elect to contest this Administrative Citation, then Respondents shall file a signed Petition for Review, including a Notice of Filing, Certificate of Service, and Notice of Appearance, with the Clerk of the Illinois Pollution Control Board, State of Illinois Center, 100 West Randolph, Suite 11-500, Chicago, Illinois 60601. A copy of said Petition for Review shall be filed with the Illinois Environmental Protection Agency's Division of Legal Counsel at 1021 North Grand Avenue East, P.O. Box 19276, Springfield, Illinois 62794-9276. Section 31.1 of the Act provides that any Petition for Review shall be filed within thirty-five (35) days of the date of service of this Administrative Citation or the Illinois Pollution Control Board shall enter a default judgment against the Respondents.


Renee Cipriano, Director
Illinois Environmental Protection Agency

Date 10/27/03

Prepared by: Susan E. Konzelmann, Legal Assistant
Division of Legal Counsel
1021 North Grand Avenue East
P.O. Box 19276
Springfield, Illinois 62794-9276
(217) 782-5544

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

AFFIDAVIT

IN THE MATTER OF:)
)
Illinois Environmental)
Protection Agency)
)
vs.)
)
RCS Inc., Landfill)
)
Respondent)

IEPA DOCKET NO.

Affiant, Charles W. King, Jr., being first duly sworn, voluntarily deposes and states as follows:

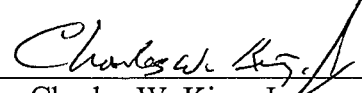
1. Affiant is a field inspector employed by the Division of Land Pollution Control of the Illinois Environmental Protection Agency and has been so employed at all times pertinent hereto.

2. On September 9, 2003 between 6:50 AM and 11:40 AM, Affiant conducted an inspection of the sanitary landfill located in Jersey County, Illinois, and known as Jerseyville/RCS Inc., Landfill by the Illinois Environmental Protection Agency. Said site has been assigned site code number LPC# 0830250012 by the Illinois Environmental Protection Agency, operating under IEPA Permit No. 1993-210-LF, and Modification No. 17 to that permit.

3. Affiant inspected said Jerseyville/RCS Inc., Landfill by an on-site inspection which included walking and photographing the site, and interviewing personnel.

4. Before and/or after said inspection of said landfill site, Affiant reviewed Illinois Environmental Protection Agency permits issued to the subject site and investigated into whether or not required documents were timely filed on behalf of the subject site.

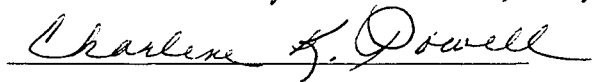
5. As a result of the activities referred to in paragraphs 3 and 4 above, Affiant completed the Inspection Report form attached hereto and made a part hereof, which, to the best of Affiant's knowledge and belief, is an accurate representation of Affiant's observations and factual conclusions with respect to said Jerseyville/RCS Inc., Landfill.



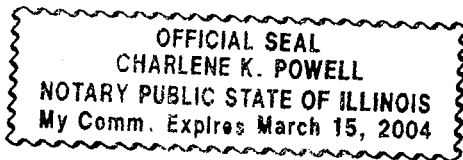
Charles W. King, Jr.

Subscribed and Sworn To before me

This 16th day of September, 2003



Charlene K. Powell



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
811 Solid Waste Landfill Inspection Checklist

County: Jersey LPC#: 0830250012 Region: 5 - Springfield
 Location/Site Name: Jerseyville/RCS Inc., Landfill
 Date: 09/03/2003 Time: From 0655 To 1140 Previous Inspection Date: 05/22/2003
 Inspector(s): Charlie King Weather: Sunny, 80 deg. F., Winds W @ 5 mph.
 No. of Photos Taken: # 23 Samples Taken: Yes # No
 Interviewed: Jay Ross and Terry "Buck" Robbins Facility Phone No.: 618/498/2024

Permitted Owner Mailing Address

RCS, Inc.
 12976 St. Charles Rock Road
 Bridgeton, MO 63044-2418

Permitted Operator Mailing Address

RCS, Inc.
 12976 St. Charles Rock Road
 Bridgeton, MO 63044-2418

RECEIVED
 OCT 08 2003

Chief Operator Mailing Address

Mr. Terry Robbins
 101 Elm Street
 Chesterfield, IL 62630

Certified Operator Mailing Address

Mr. Jay Ross
 RCS Inc., Landfill
 1336 Crystal Lake Road
 Jerseyville, IL 62052

IEPA-BOL

AUTHORIZATION: Significant Modification Permit Initial: 1993-210-LF Latest Modification 17

OPERATIONAL STATUS: Operating Closed-Not Closed-Date Certified:

TYPE OF OPERATION: Existing Landfills 814-Subpart C 814-Subpart D New Landfills: 811-Putres./Chem.

SECTION	DESCRIPTION	VIOL
ILLINOIS ENVIRONMENTAL PROTECTION ACT REQUIREMENTS		
1.	9(a) CAUSE, THREATEN OR ALLOW AIR POLLUTION IN ILLINOIS	<input type="checkbox"/>
2.	9(c) CAUSE OR ALLOW OPEN BURNING	<input type="checkbox"/>
3.	12(a) CAUSE, THREATEN OR ALLOW WATER POLLUTION IN ILLINOIS	<input type="checkbox"/>
4.	12(d) CREATE A WATER POLLUTION HAZARD	<input type="checkbox"/>
5.	12(f) CAUSE, THREATEN OR ALLOW DISCHARGE WITHOUT OR IN VIOLATION OF AN NPDES PERMIT	<input type="checkbox"/>
6.	21(a) CAUSE OR ALLOW OPEN DUMPING	<input type="checkbox"/>
7.	21(d) CONDUCT ANY WASTE-STORAGE, WASTE-TREATMENT, OR WASTE- DISPOSAL OPERATION:	
	(1) Without a Permit or in Violation of Any Conditions of a Permit (See Permit Provisions)	<input checked="" type="checkbox"/>
	(2) In Violation of Any Regulations or Standards Adopted by the Board	<input checked="" type="checkbox"/>
8.	21(e) DISPOSE, TREAT, STORE, OR ABANDON ANY WASTE, OR TRANSPORT ANY WASTE INTO THE STATE AT/TO SITES NOT MEETING REQUIREMENTS OF ACT AND REGULATIONS	<input checked="" type="checkbox"/>
9.	21(f)(1) CONDUCT ANY HAZARDOUS WASTE-STORAGE, TREATMENT OR DISPOSAL OPERATION WITHOUT A RCRA PERMIT.	<input type="checkbox"/>

LPC #: O830250012

Inspection Date: September 9, 2003

10.	21(o)	CONDUCT A SANITARY LANDFILL OPERATION WHICH RESULTS IN ANY OF THE FOLLOWING CONDITIONS:	
	(1)	Refuse in Standing or Flowing Water	<input type="checkbox"/>
	(2)	Leachate Flows Entering Waters of the State	<input type="checkbox"/>
	(3)	Leachate Flows Exiting the Landfill Confines	<input type="checkbox"/>
	(4)	Open Burning of Refuse in Violation of Section 9 of the Act	<input type="checkbox"/>
	(5)	Uncovered Refuse Remaining From Any Previous Operating Day or at the Conclusion of Any Operating Day	<input checked="" type="checkbox"/>
	(6)	Failure to Provide Final Cover Within Time Limits	<input type="checkbox"/>
	(7)	Acceptance of Wastes Without Necessary Permits	<input type="checkbox"/>
	(8)	Scavenging as Defined by Board Regulations	<input type="checkbox"/>
	(9)	Deposition of Refuse in Any Unpermitted Portion of the Landfill	<input type="checkbox"/>
	(10)	Acceptance of Special Waste Without a Required Manifest	<input type="checkbox"/>
	(11)	Failure to Submit Reports Required by Permits or Board Regulations	<input type="checkbox"/>
	(12)	Failure to Collect and Contain Litter by the End of each Operating Day	<input type="checkbox"/>
	(13)	Failure to Submit Any Cost Estimate, Performance Bond or Other Security	<input type="checkbox"/>
11.	21(t)	CAUSE OR ALLOW A LATERAL EXPANSION OF A MUNICIPAL SOLID WASTE LANDFILL (MSWLF) UNIT WITHOUT A PERMIT MODIFICATION	<input type="checkbox"/>
12.	21.6(b)	ACCEPTANCE OF LIQUID USED OIL FOR FINAL DISPOSAL (EFFECTIVE JULY 1, 1996)	<input type="checkbox"/>
13.	22.01	FAILURE TO SUBMIT ANNUAL NONHAZARDOUS SPECIAL WASTE	<input type="checkbox"/>
14.	22.17	LANDFILL POST-CLOSURE CARE	
	(a)	Failure to Monitor Gas, Water, Settling	<input type="checkbox"/>
	(b)	Failure to Take Remedial Action	<input type="checkbox"/>
15.	22.22(c)	ACCEPTANCE OF LANDSCAPE WASTE FOR FINAL DISPOSAL	<input type="checkbox"/>
16.	22.23(f)(2)	CAUSE OR ALLOW THE DISPOSAL OF ANY LEAD-ACID BATTERY	<input type="checkbox"/>
17.	22.28(b)	ACCEPTANCE OF WHITE GOODS FOR FINAL DISPOSAL	<input type="checkbox"/>
18.	55(b)(1)	ACCEPTANCE OF ANY USED OR WASTE TIRE FOR FINAL DISPOSAL (UNLESS LANDFILL MEETS EXEMPTION OF 55(b)(1))	<input type="checkbox"/>
19.	56.1(a)	CAUSE OR ALLOW THE DISPOSAL OF ANY POTENTIALLY INFECTIOUS MEDICAL WASTE	<input type="checkbox"/>
SOLID WASTE SITE OPERATOR CERTIFICATION LAW REQUIREMENTS			
20.	225 ILCS 230/1004	CAUSING OF ALLOWING OPERATION OF A LANDFILL WITHOUT PROPER COMPETENCY CERTIFICATE	<input type="checkbox"/>
35 ILLINOIS ADMINISTRATIVE CODE REQUIREMENTS SUBTITLE G			
PRIOR CONDUCT CERTIFICATION REQUIREMENTS			
	745.181	CHIEF OPERATOR REQUIREMENTS	<input type="checkbox"/>
	745.201	PRIOR CONDUCT CERTIFICATION PROHIBITIONS	<input type="checkbox"/>
SPECIAL WASTE HAULING REQUIREMENTS			
23.	809.301	REQUIREMENTS FOR DELIVERY OF SPECIAL WASTE TO HAULERS	<input type="checkbox"/>

24.	809.302(a)	REQUIREMENTS FOR ACCEPTANCE OF SPECIAL WASTE FROM HAULERS	<input type="checkbox"/>
25.	809.501	MANIFESTS, RECORDS, ACCESS TO RECORDS, REPORTING REQUIREMENTS AND FORMS	
	(a)	Delivery of Special Waste to Hauler	<input type="checkbox"/>
	(e)	Retention of Special Waste Manifests	<input type="checkbox"/>
NEW SOLID WASTE LANDFILL REQUIREMENTS			
	PART 811 SUBPART	GENERAL STANDARDS FOR ALL LANDFILLS	
26.	811.103	SURFACE WATER DRAINAGE	
	(a)	Runoff from Disturbed Areas	<input type="checkbox"/>
	(b)	Diversion of Runoff from Undisturbed Areas	<input type="checkbox"/>
27.	811.104	SURVEY CONTROL	
	(a)	Boundaries Surveyed and Marked	<input type="checkbox"/>
	(b)	Stakes and Monuments Marked	<input type="checkbox"/>
	(c)	Stakes and Monuments Inspected	<input type="checkbox"/>
	(d)	Control Monument Established and Maintained	<input type="checkbox"/>
28.	811.105	COMPACTION	<input type="checkbox"/>
29.	811.106	DAILY COVER	
	(a)	Six Inches Soil	<input checked="" type="checkbox"/>
	(b)	Alternative Daily Cover	<input type="checkbox"/>
30.	811.107	OPERATING STANDARDS	
	(a)	Phasing of Operations	<input type="checkbox"/>
	(b)	Work Face Size and Slope	<input type="checkbox"/>
	(c)	Equipment	<input type="checkbox"/>
	(d)	Utilities	<input type="checkbox"/>
	(e)	Maintenance	<input type="checkbox"/>
	(f)	Open Burning	<input type="checkbox"/>
	(g)	Dust Control	<input type="checkbox"/>
	(h)	Noise Control	<input type="checkbox"/>
	(i)	Vector Control	<input type="checkbox"/>
	(j)	Fire Protection	<input type="checkbox"/>
	(k)	Litter Control	<input type="checkbox"/>
	(l)	Mud Tracking	<input type="checkbox"/>
	(m)	Liquid Restrictions for MSWLF Units	<input type="checkbox"/>
31.	811.108	SALVAGING	
	(a)	Salvaging Interferes with Operation	<input type="checkbox"/>
	(b)	Safe and Sanitary Manner	<input type="checkbox"/>
	(c)	Management of Salvagable Materials	<input type="checkbox"/>
32.	811.109	BOUNDARY CONTROL	
	(a)	Access Restricted	<input type="checkbox"/>
	(b)	Proper Sign Posted	<input type="checkbox"/>

33.	811.110	CLOSURE AND WRITTEN CLOSURE PLAN	
	(a)	Final Slopes and Contours	<input type="checkbox"/>
	(b)	Drainage Ways and Swales	<input type="checkbox"/>
	(c)	Final Configuration	<input type="checkbox"/>
	(d)	Written Closure Plan	<input type="checkbox"/>
	(e)	Initiation of Closure Activities at MSWLF Units	<input type="checkbox"/>
	(f)	Completion of Closure Activities at MSWLF Units	<input type="checkbox"/>
	(g)	Deed Notation for MSWLF Units	<input type="checkbox"/>
34.	811.111	POST-CLOSURE MAINTENANCE	
	(a)	Procedures After Receipt of Final Volume of Waste	<input type="checkbox"/>
	(b)	Remove All Equipment of Structures	<input type="checkbox"/>
	(c)	Maintenance and Inspection of the Final Cover and Vegetation	<input type="checkbox"/>
	(d)	Planned Uses of Property at MSWLF Units	<input type="checkbox"/>
35.	811.112	RECORDKEEPING REQUIREMENTS FOR MSWLF UNITS	
	(a)	Location Restriction Demonstration	<input type="checkbox"/>
	(b)	Load Checking Requirements	<input type="checkbox"/>
	(c)	Gas Monitoring Records	<input type="checkbox"/>
	(d)	MSWLF Liquid Restriction Records	<input type="checkbox"/>
	(e)	Groundwater Monitoring Program Requirements	<input type="checkbox"/>
	(f)	Closure and Post Closure Care Requirements	<input type="checkbox"/>
	(g)	Cost Estimates and Financial Assurance Requirements	<input type="checkbox"/>
	PART 811 SUBPART C	PUTRESCIBLE AND CHEMICAL WASTE LANDFILLS	
36.	811.302	FACILITY LOCATION	
	(c)	Site Screening (Does Not Apply To Part 814-Subpart D Sites)	<input type="checkbox"/>
37.	811.309	LEACHATE TREATMENT AND DISPOSAL SYSTEM	
	(a)	General Requirements	<input type="checkbox"/>
	(c)	Standards for On-Site Treatment and Pretreatment	<input type="checkbox"/>
	(d)	Standards for Leachate Storage System	<input type="checkbox"/>
	(e)	Standards for Discharge to Off-Site Treatment	<input type="checkbox"/>
	(f)	Standards for Leachate Recycling Systems	<input type="checkbox"/>
	(g)	Standards for Leachate Monitoring Systems	<input type="checkbox"/>
38.	811.310	LANDFILL GAS MONITORING (FOR SITES ACCEPTING PUTRESCIBLE WASTE)	
	(b)	Location and Design of Gas Monitoring Wells	<input type="checkbox"/>
	(c)	Monitoring Frequency for Landfill Gas	<input type="checkbox"/>
	(d)	Monitoring Parameters	<input type="checkbox"/>
39.	811.311	LANDFILL GAS MANAGEMENT SYSTEM (FOR CHEMICAL AND PUTRESCIBLE LANDFILLS)	
	(a)	Conditions for Installation of Gas Management System	<input type="checkbox"/>
	(b)	Notification and Implementation Requirements	<input type="checkbox"/>
	(c)	Standards for Gas Venting	<input type="checkbox"/>
	(d)	Standards for Gas Collection	<input type="checkbox"/>

LPC #: 0830250012

Inspection Date: September 9, 2003

40.	811.312	LANDFILL GAS PROCESS AND DISPOSAL SYSTEM	
	(c)	No Unpermitted Gas Discharge	<input type="checkbox"/>
	(d)	Gas Flow Rate Measurements into Treatment of Combustion Device	<input type="checkbox"/>
	(e)	Standards for Gas Flares	<input type="checkbox"/>
	(f)	Standards for On-Site Combustion of Landfill Gas Using Devices Other Than	<input type="checkbox"/>
	(g)	Gas Transported Off-Site	<input type="checkbox"/>
41.	811.313	INTERMEDIATE COVER	
	(a)	Requirements for the Application for Intermediate Cover	<input type="checkbox"/>
	(b)	Runoff and Infiltration Control	<input type="checkbox"/>
	(c)	Maintenance of Intermediate Cover	<input checked="" type="checkbox"/>
42.	811.314	FINAL COVER SYSTEM (DOES NOT APPLY TO PART 814 SITES THAT HAVE CLOSED, COVERED AND VEGETATED PRIOR TO SEPTEMBER 18, 1990)	
	(a)	General Requirements	<input type="checkbox"/>
	(b)	Standards for Low Permeability Layer	<input type="checkbox"/>
	(c)	Standards for Final Protective Layer	<input type="checkbox"/>
43.	811.316	PLUGGING AND SEALING OF DRILL HOLES	<input type="checkbox"/>
44.	811.321	WASTE PLACEMENT	
	(a)	Phasing of Operations	<input type="checkbox"/>
	(b)	Initial Waste Placement	<input type="checkbox"/>
45.	811.322	FINAL SLOPE AND STABILIZATION	
	(a)	Grade Capable of Supporting Vegetation and Minimizing Erosion	<input type="checkbox"/>
	(b)	Slopes Required to Drain	<input type="checkbox"/>
	(c)	Vegetation	<input type="checkbox"/>
	(d)	Structures Built over the Unit	<input type="checkbox"/>
46.	811.323	LOAD CHECKING PROGRAM	
	(a)	Load Checking Program Implemented	<input type="checkbox"/>
	(b)	Load Checking Program for PCB's at MSWLF Units	<input type="checkbox"/>
	(c)	Load Checking Program Components	<input type="checkbox"/>
	(d)	Handling Regulated Hazardous Wastes	<input type="checkbox"/>
	PART 811 SUBPART D	MANAGEMENT OF SPECIAL WASTES AT LANDFILLS	
47.	811.402	NOTICE TO GENERATORS AND TRANSPORTERS	<input type="checkbox"/>
48.	811.403	SPECIAL WASTE MANIFESTS REQUIREMENTS	<input type="checkbox"/>
49.	811.404	IDENTIFICATION RECORD	
	(a)	Special Waste Profile Identification Sheet	<input type="checkbox"/>
	(b)	Special Waste Recertification	<input type="checkbox"/>
50.	811.405	RECORDKEEPING REQUIREMENTS	<input type="checkbox"/>
51.	811.406	PROCEDURES FOR EXCLUDING REGULATED HAZARDOUS WASTES	<input type="checkbox"/>

PART 811 SUBPART G		FINANCIAL ASSURANCE	
52.	811.700	COMPLY WITH FINANCIAL ASSURANCE REQUIREMENTS OF PART 811, SUBPART G	<input type="checkbox"/>
53.	811.701	UPGRADING FINANCIAL ASSURANCE	<input type="checkbox"/>
54.	811.704	CLOSURE AND POST-CLOSURE CARE COST ESTIMATES	<input type="checkbox"/>
55.	811.705	REVISION OF COST ESTIMATE	<input type="checkbox"/>
SOLID WASTE FEE SYSTEM REQUIREMENTS			
56.	Part 858 Subpart B	MAINTAINED, RETAINED & SUBMITTED DAILY & MONTHLY SOLID WASTE RECORDS AND QUARTERLY SOLID WASTE SUMMARIES	<input type="checkbox"/>
57.	Part 858 Subpart C	MAINTAINED, RETAINED & SUBMITTED DAILY & MONTHLY SOLID WASTE RECORDS AND QUARTERLY SOLID WASTE SUMMARIES WHERE INCOMING WASTE IS NOT WEIGHED (LIST SPECIFIC)	<input type="checkbox"/>
OTHER REQUIREMENTS			
58.	OTHER:	APPARENT VIOLATION OF: (<input type="checkbox"/>) PCB; (<input type="checkbox"/>) CIRCUIT COURT CASE NUMBER: ORDER ENTERED ON:	<input type="checkbox"/>
59.			<input type="checkbox"/>
			<input type="checkbox"/>
			<input type="checkbox"/>
			<input type="checkbox"/>
			<input type="checkbox"/>

Charles W. Berg

 Signature of Inspector(s)

Informational Notes

1. [Illinois] Environmental Protection Act: 415 ILCS 5/4.
2. Illinois Pollution Control Board: 35 Ill. Adm. Code, Subtitle G.
3. Statutory and regulatory references herein are provided for convenience only and should not be construed as legal conclusions of the Agency or as limiting the Agency's statutory or regulatory powers. Requirements of some statutes and regulations cited are in summary format. Full text of requirements can be found in references listed in 1. and 2. above.
4. The provisions of subsection (o) of Section 21 of the [Illinois] Environmental Protection Act shall be enforceable either by administrative citation under Section 31.1 of the Act or by complaint under Section 31 of the Act.
5. This inspection was conducted in accordance with Sections 4(c) and 4(d) of the [Illinois] Environmental Protection Act: 415 ILCS 5/4(c) and (d).
6. Items marked with an "NE" were not evaluated at the time of this inspection.

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

MEMORANDUM

DATE: September 15, 2003

TO: Land Division File

FROM: ^{CK} Charlie King, DLPC/FOS – Springfield Region

SUBJECT: LPC # 0830255012 – Jersey County
Jerseyville/RCS Inc., Landfill
FOS - File

RECEIVED

OCT 08 2003

IEPA-BOL

NARRATIVE INSPECTION REPORT DOCUMENT

The purpose of this memorandum is to serve as the Narrative Inspection Report Document of an inspection conducted at the subject site, RCS Inc., Landfill (RCS) on September 9, 2003 from approximately 6:50 a.m. until 11:40 a.m., by this author. I was not accompanied by anyone else from the Illinois EPA on the inspection. While at the landfill, I conducted the physical inspection, the Document Review and Exit Interview portions of the landfill inspection. Each of these main areas is discussed herein. As shown in this report, there are apparent violations being alleged as a result of this inspection.

As I approached the landfill, the gates to the landfill were closed. However, within five minutes, Terry "Buck" Robbins, the Chief Operator of the Landfill and Allied Machine Operator, arrived. After Mr. Robbins unlocked the gate, I drove directly to the maintenance shed and parked there. It should be noted that Mr. Robbins serves as the acting landfill manager whenever Jay Ross, the General Manager and Certified Operator is not present at RCS Inc., Landfill. At the shed, Mr. Robbins put a call in to Mr. Ross, to let him know that I was there. Mr. Ross told Mr. Robbins that he would come to RCS to see me. Mr. Ross was apparently working at Roxana, another landfill that is owned, managed and operated by Allied, with Mr. Ross as General Manager there as well.

Mr. Robbins stated that they had been busy with 24 to 28 semi-truck loads of underground storage tank (UST) contaminated soil arriving daily, which equated to approximately 460 – 500 tons. He also stated that they were hit hard by rain over the Labor Day weekend (August 30 – September 1, 2003). He said that six inches of rain caused heavy storm runoff from the landfill, which was especially strong at the northwest corner of Cell # 2. That is a part of that cell that has frequently shown erosion problems in the past. Mr. Robbins had placed two six-inch diameter corrugated flexible black plastic pipes down the length of the northwest sidewall (see attached Digital Photograph #s 006, 007 and 008; also note that all references herein to photographs are those Digital Photographs enclosed with this report). He pointed to a green piece of six-inch pipe,

approximately six-feet long with new couplings that he stated had just arrived so that repairs could be made to the system that removes storm water from yet to be permitted Cell # 3. That repair was made during the morning of the inspection and the pump was operating and removing storm flow to the detention pond south of the landfill, as shown in photo #s 020 and 021.

Mr. Robbins mentioned that although the landfill mound appeared to be high, they could still go 13' higher, as evidenced by elevation stakes placed by surveyors on top of Cell #s 1 and 2. Upon inquiry, he stated that work on construction and permitting of Cell # 3 should start next year. In a later conversation that day with Mr. Ross, he echoed that statement and added that they planned to have half of Cell # 3 permitted in 2004.

Observation in the machine shed, near where we were at, revealed that the large Caterpillar DH7 bulldozer was in the shed. Upon inquiry, Mr. Robbins stated that the machine had developed a slow hydraulic fluid leak that he was trying to pinpoint. He stated that he hoped to have it fixed by the end of the operating day. In the east room of that shed, a bucket front loader with back hoe, and a small tractor used to haul small amounts of fuel in an attached tank, and used for other light uses, were located there. A small, abbreviated scraper type machine used to accumulate soil was parked outside of the shed, along with the Caterpillar C75 Challenger. That machine is like a bulldozer but has tracks like a tank. However, the tracks on the Challenger are made of hard rubber. It is used to haul the small scraper and has other uses as well. A small Caterpillar D4 bulldozer was also parked outside the maintenance shed, as was a Galion road grader. The large Caterpillar 816 compactor was parked on top of the landfill near the fill area, as was a small landfill owned pick-up truck. All of the equipment, except for the road grader, is owned by Allied. The road grader is rented from a business in Jerseyville.

Upon inquiry, Mr. Robbins stated that other than the extra UST soil, most of the waste arriving daily was local waste. He stated that Whiteway Sanitation went out of business and therefore no longer hauls there. He did say that a company based out of Shipman, named Merritt Hauling, has been bringing in wastes locally. He added that although the company is operated out of Shipman, the equipment is kept at Royal Lakes.

This inspection was the 25th at this site pursuant to the Act and regulations, 35 IAC, Parts 810, 811, 812 and 813. Specifically, Part 810 refers to Solid Waste Disposal Provisions. Part 811 refers to Standards for New Solid Waste Landfills. Part 812 refers to Information to be submitted in a Permit Application. Part 813 refers to Procedural Requirements for Permitted landfills. Since RCS Inc., Landfill (RCS) is an operating putrescible/chemical waste landfill, the regulations most pertinent to this inspection report are those of Part 811. Three "governing" documents are the Act, the regulations, 35 IAC, and the operating permit, Permit No. 1993-210-LF (the permit), Modification 17 (this modification was the most recently approved Significant Modification to the Permit at the time of the inspection). Other documents and logbooks were reviewed at the landfill from the time of the previous site inspection conducted on May 22, 2003, as explored and presented in the document review portion of this report.

The landfill, permitted as a putrescible/chemical waste landfill, is limited to municipal and non-hazardous special wastes. The landfill is approximately one and one-half miles southwest of the City of Jerseyville. Specific and legal descriptions of the location and ownership of the RCS Inc., Landfill are already in the Division File, and therefore, will not be repeated here. The address of the landfill is: 1336 Crystal Lake Road, Jerseyville, IL 62052. The landfill telephone number is: 618/498-2024.

Allied Waste Industries, Inc. is the parent company of a group of landfills. The Vice President of the St. Louis Group is Steve Meyer. The Vice President of RCS Inc., Landfill is Dan Imig. The Division Manager of the St. Louis Group is Matt Kingsley, P. E. As mentioned, the General Manager and Certified Operator of RCS Inc., Landfill is Jay Ross. He is also the site manager of the Litchfield and Roxana Landfills. Terry "Buck" Robbins is the Chief Operator and Allied Machine Operator. Earl Tielpelman is another Allied Machine Operator and laborer at the landfill.

Mr. Robbins' address is: 101 Elm Street, Chesterfield, IL 62630. His telephone number is: 618/779-6321. This is provided for the Division File. The information is retained and necessary in the event of Illinois EPA issuance of an Administrative Citation (AC), since one will be sent, when warranted, to the Chief Operator at his home address, as well as to the landfill. This is the case whether the Chief Operator was at the landfill or not, during any inspection where apparent violations of the Illinois Environmental Protection Act (Act), or the regulations, Title 35, Illinois Administrative Code, Subtitle G (35 IAC) result in AC issuance.

Any correspondence to the owner or operator should be addressed to: RCS Inc., 12965 St. Charles Rock Road, Bridgeton, MO 63044-2418, Attn., Mr. Dan Imig. General Correspondence to RCS Inc., Landfill should be addressed to Ms. Matt Kingsley, P. E., Division Manager, St. Louis District Landfills, 13570 St. Charles Rock Road, Bridgeton, MO 63044, or to: Mr. Jay Ross, General Manager, RCS Inc., Landfill, 1336 Crystal Lake Rd., Jerseyville, IL 62052.

The current permit engineer assigned to this site is Jennifer Flatt, BOL/DLPC/Solid Waste Permits. She attended a previous landfill inspection at the site on September 17, 2001, and is therefore familiar with this site.

The Illinois EPA reviewer of the financial assurance conditions at this site is Blake Harris, BOL/DLPC – Solid Waste Management Section. I spoke with Mr. Harris after the September 9, 2003 inspection, on September 15, 2003. He stated that there is an insurance policy in the amount of \$2,108,993. Per the Permit, Significant Modification No. 17 dated July 18, 2003, the required amount of financial assurance is \$2,172,132 (Part VII, Closure/Post Closure, Item 5. However, per Mr. Harris, the landfill has 90 days from the date of the permit to update their funding source, in this case, their insurance policy. That update will be due on October 16, 2003, per Mr. Harris. Therefore, the insurance policy amount is currently adequate. However, since the time is approaching for the necessary increase in face value of the policy, Mr. Harris will telephone Allied and advise them of this need. This author also

notified Darlene, the Office Manager at RCS and Jay Ross via voice mail at 618/656-6912 on September 15, 2003, of the necessary increase.

The permitted operating hours at the landfill are from 6:00 a.m. until 6:00 p.m., Monday through Saturday (Sig. Mod. No. 17, Permit Condition II 10., p. 7). The landfill is closed on Sundays. The landfill instilled temporary hours of 9:00 a.m. through 5:00 p.m., Monday through Saturday, a few years ago. During the previous year, Mr. Mike Cassens, the former Chief Operator at RCS, stated that the temporary landfill hours had been again modified to 9:00 a.m. through 4:00 p.m., Monday through Friday, and closed on Saturday and Sunday. Mr. Ross notified this author via telephone in early September, 2003 that the hours of operation have temporarily changed again to 8:00 a.m. through 4:00 p.m., to allow for the extra UST soil arriving daily at the landfill. As mentioned in this author's July 31, 2000 Narrative Inspection Report Document memorandum to the Land Division File, Mr. Cassens and I had reached a verbal agreement for us to meet at the landfill for future inspections at 7:30 a.m. This has been agreeable with the Illinois EPA so long as whenever inspections were to be conducted that RCS personnel would keep to the agreement. This agreement was recently re-affirmed between this inspector, Mr. Ross and Mr. Robbins. Messrs. Ross and Robbins agreed upon this arrangement with me following the August 29, 2002 site inspection, providing that I arrived by 7:30 a.m. in lieu of any other arrangements. However, Mr. Robbins normally arrives at the landfill at 7:00 a.m. and allows me to commence the landfill inspection then, upon his arrival. It is crucial for an inspector to check the adequacy of daily cover from the previous operating day. This arrangement with these landfill officials should allow the accuracy of that part of the inspection process. I also informed them that under unique or unforeseen circumstances, Illinois EPA would enter the landfill at anytime.

On the day of the most recent inspection, September 9, 2003, Mr. Robbins advised me that soil was being used to cover the landfill active fill area. Mr. Robbins and Mr. Ross were notified on September 15, 2003, via telephone, to use clean soil or the permitted alternative daily cover tarp(s). It is not known if UST soil has been used recently for cover material or not. However, since the landfill is not permitted to use UST soil as cover material in their permit, the reminder was given as a courtesy to abide by the permit.

Upon arrival at the site on the day of the inspection, the weather was sunny with an air temperature of approximately 80° F. Winds were westerly at approximately 5 mph. Surface soil conditions were mostly dry, but damp in places.

Following my initial site conversation with Mr. Robbins and review of heavy equipment present, I photographed the permitted portion in the distance from where I was standing, just west of the maintenance shed, as shown in attached photo # 001. Mr. Robbins had started to attend to starting up the large DH7 bulldozer. I then walked the haul road past the office and second set of rumble strips (there are another set between the office and the front gate), and to where the haul road bends to the west, just north of the un-permitted Cell # 4. At that point, I checked the groundwater monitoring wells in the immediate area, starting with well # G111. I also checked the gas probes (see photo # 002). I

inspected the concrete bases, which were intact with no visible cracks. I checked the above ground portion of the casings, which were also intact. The wells and probes were properly locked and marked. Nothing out of the ordinary was observed and the surrounding vegetation had been recently mowed at many of the wells and probes. Throughout the physical inspection of the facility, all of the groundwater monitoring wells and gas probes appeared to be properly cared for as well.

I walked 50 feet or so to the south of gas probe GP306 where I had an excellent view of the north side of the permitted landfill Cell #2. I photographed the permitted portion again as shown in attached photo #s 003 and 004. Some ponded water and marshy conditions consisting of tall marsh grass in standing water could be seen in Cell # 3. This is shown in attached photo # 005. The pump, when operating, takes storm water out of the cell to the storm water detention pond to the south of Cell # 1. This was previously shown in photo #s 020 and 021. Photo # 022 shows the detention pond. The storm water then goes through an overflow pipe, under the berm shown in photo # 022 and exits the pipe into a tributary stream to Sandy Creek, as shown in photo # 023.

The permitted landfill slope at the northwest corner of Cell # 2 appeared to once again have some exposed refuse. As mentioned, this is why Mr. Robbins had placed the flexible black pipes as he had, as shown in photo #s 006, 007 and 008. However, many areas along the lower portion of the entire northern face had small areas of exposed refuse (also see photo #s 009, 010 and 011). These exposed refuse areas show evidence of inadequate intermediate cover, an apparent violation of the regulations, Title 35, Illinois Administrative Code, Subtitle G (35 IAC), Section 811.313(c). This then also shows an apparent violation of the Illinois Environmental Protection Act (Act), Section 21(o)(5), as does some exposed refuse, albeit minor, in the active fill area, as shown in photo #s 012 and 013. Associated apparent violations of the permit also exist. These are all explained in greater detail, later in this report. It is understandable that intermediate cover would be broken down by erosion when one considers the intense rainfall of the Labor Day weekend, previously discussed. However, that was over a week prior to the inspection, during which the weather was mostly sunny, or with no or minimal rain. However, additional soil cover was necessary to comply with the regulations. In addition to informing Messrs. Ross and Robbins of the apparent violations, I also recommended them to keep a daily watch over that situation at that location, the entire north face, and anywhere else in cells with buried waste.

At the fill area, the first UST soil was dumped before 9:00 a.m., as shown in photo # 014. Photo # 015 shows the dumping of demolition wastes by a local contractor. Photo #s 016 and 017 show the woods to the east of Cell # 2 and southeast of Cell # 1, respectively. As can be seen in these photos, there was no apparent litter shown out of the permitted fill area, in the woods.

Mr. Ross accompanied me on a walk to the hill at the northeast corner of the landfill. I inspected groundwater monitoring wells and gas probes along the way. From the top of that hill, which serves as a public-view block, the landfill can be seen with yet another semi-truck tipping its load of UST soil, as shown in photo # 018. We then returned to the

active fill area, because the first two Merritt Hauling local refuse hauling trucks arrived and dumped their loads. I requested Mr. Ross to call Mr. Robbins on his radio to catch the name on the trucks and to not touch those specific waste piles until I could get up there to inspect the loads. Mr. Robbins asked if he should have the driver wait, and I said no, so long as he had the trucking company identified. Once back at the active fill area, both loads were inspected and found to contain nothing unusual or unacceptable. These loads are shown in photo # 019.

Following the inspection of the Merritt Hauling loads, an inspection of the monitoring wells and gas probes at the southern end of the landfill was conducted. The storm water flow, detention pond and discharge to the tributary to Sandy Creek were observed next. This was previously addressed and the relative inspection photos were referenced.

Both leachate collection tank areas were inspected next and found to be in good operating condition. We then walked up to the maintenance shed. Other than some recommendations for improved housekeeping, things looked good there.

During the inspection, I also inspected the south face of Cell # 1, and both the east and west faces of Cell #s 1 and 2. No exposed refuse was observed on these faces. In fact, they appeared to be in good shape. Only the north face, as previously noted, was out of compliance.

Following the physical inspection of the landfill, I proceeded to the landfill office and conducted the document review portion of the inspection and the exit interview in the presence of Jay Ross. Darlene, the Office Manager, provided the landfill operation books so that I could review the information, i.e., logged data since the previous site inspection. Gas, leachate, daily operations, alternate daily cover, weekly load inspections, asbestos, asbestos placement grid map, underground storage tank (UST) soil placement, non-special waste approval and special waste generator logs were checked. The books appeared to be in order.

The groundwater logs received a cursory review by this inspector. However, as in the past, I explained to Mr. Ross that my review of the groundwater logs and report was only cursory and that a qualified Illinois EPA geologist or hydro-geologist would look at those issues in detail, and that it was possible that future violations could be alleged based on those reviews.

Following the document review, I conducted the exit interview with Mr. Ross. He stated that Mr. Robbins was disappointed that apparent violations existed, as he was. I told him that I would mention the heavy rain the week before over the Labor Day Weekend. However, since a week had passed, the exposed refuse areas should have been covered with additional soil. Mr. Ross assured me that they would do whatever was necessary to work within compliance.

During the inspection, 23 photographs were taken with a digital camera. They show the conditions at the landfill on the date of the inspection. Specific photographs were already

discussed in this report. From previous site inspections and the current inspection, and from previous site sketches, an updated sketch of the site was developed. It shows the approximate locations and directions of the inspection photos as well as the general layout of the site. On the digital camera, photographs are presented in three digit numbers, i.e., 001, 002, 003 etc. That is the way they are referred to in the narrative and on the Digital Photograph Photocopies attached to this report. However, on the site sketch, to save space, the photo numbers are presented in real numbers, i.e., 1, 2, 3 etc. Copies of the Digital Inspection Photocopies and the Site Sketch accompany this report.

As noted, some apparent violations of the Illinois Environmental Protection Act, including a 21(o) violation, which can carry a monetary penalty, were observed. Also, an apparent violation of the regulations, Title 35, Illinois Administrative Code, Subtitle G, was noted, as were some specific Permit apparent violations. An 811 Solid Waste Landfill Inspection Checklist accompanies this report, which shows the apparent violations.

OTHER COMMENTS

1. Numerous small diameter trees, some as high as 20', have started popping up on the west side of yet to be permitted Cell # 3, just to the west and at the top of the west sidewall. These will eventually need to be removed as the development of Cell # 3 is undertaken next year. Additionally, the vegetation on top of the west sidewall of the yet to be permitted cells is very dense. It would be quite helpful for inspection purposes if a north/south path could be mowed at this area
2. In addition to discussing the exposed refuse on the north face, Mr. Ross was advised that the rest of the landfill inspection was favorable, and no other apparent violations are being alleged. He stated that they are trying to do whatever necessary to keep in compliance.

CK

cc: DLPC/FOS — Springfield Region
DLC — Michelle Ryan



Illinois Environmental Protection Agency
Bureau of Land

DIGITAL PHOTOGRAPHS

LPC # 0830250012— Jersey County
Jerseyville/RCS Inc., Landfill
FOS File

Date: September 9, 2003

Time: 7:38 a.m.

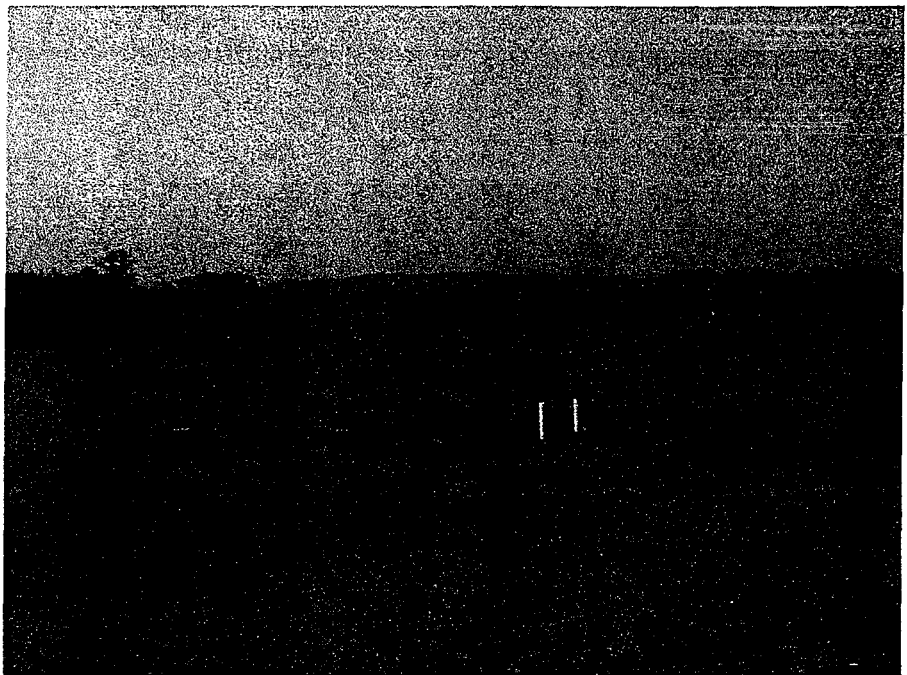
Direction: S

Photo by: Charlie King

Photo File Name:

0830250012~09092003-001

Comments: Landfill in distance
from the maintenance shed.



Date: September 9, 2003

Time: 7:42 a.m.

Direction: NE

Photo by: Charlie King

Photo File Name:

0830250012~09092003-002

Comments: Gas probe GP306 is
shown. The casing was in good
shape and the well is properly
marked. Protective steel posts
surround the well.





Illinois Environmental Protection Agency
Bureau of Land

DIGITAL PHOTOGRAPHS

**LPC # 0830250012— Jersey County
Jerseyville/RCS Inc., Landfill
FOS File**

Date: September 9, 2003

Time: 7:45 a.m.

Direction: SE

Photo by: Charlie King

Photo File Name:

0830250012~09092003-003

Comments: The landfill is shown
from an area just north of the yet to
be permitted Cell # 4.



Date: September 9, 2003

Time: 7:45 a.m.

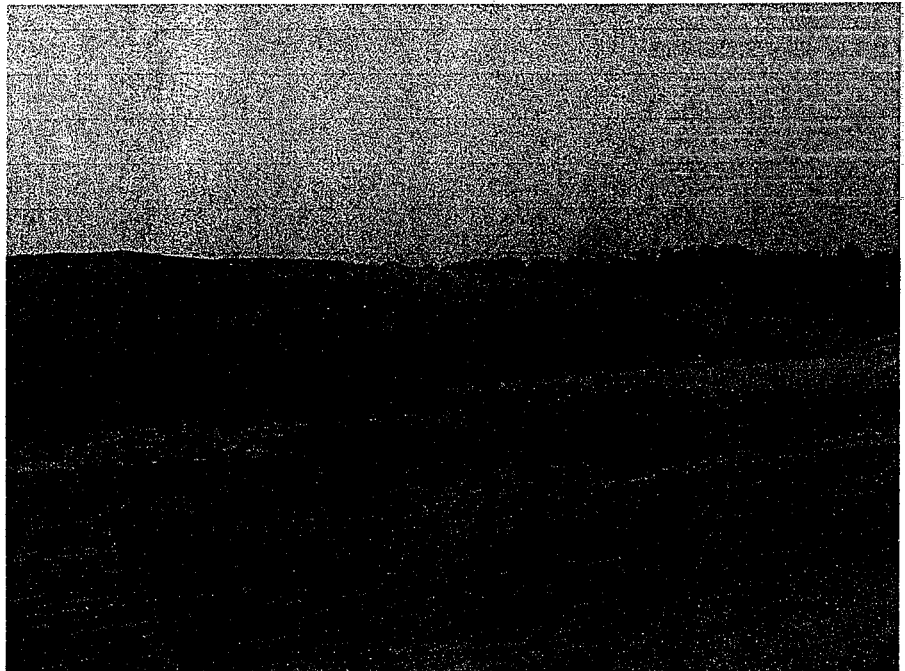
Direction: SE

Photo by: Charlie King

Photo File Name:

0830250012~09092003-004

Comments: The landfill is also
shown here from an area just north
of the yet to be permitted Cell # 4.





Illinois Environmental Protection Agency
Bureau of Land

DIGITAL PHOTOGRAPHS

LPC # 0830250012— Jersey County
Jerseyville/RCS Inc., Landfill
FOS File

Date: September 9, 2003

Time: 7:51 a.m.

Direction: E/SE

Photo by: Charlie King

Photo File Name:

0830250012~09092003-005

Comments: Yet to be permitted
Cell # 3 with ponded water.



Date: September 9, 2003

Time: 7:52 a.m.

Direction: S/SE

Photo by: Charlie King

Photo File Name:

0830250012~09092003-006

Comments: Two flexible plastic
pipes were placed at the northwest
area of Cell # 2 to help control
storm water runoff and erosion.





DIGITAL PHOTOGRAPHS

**LPC # 0830250012— Jersey County
Jerseyville/RCS Inc., Landfill
FOS File**

Date: September 9, 2003

Time: 8:02 a.m.

Direction: S/SW

Photo by: Charlie King

Photo File Name:

0830250012~09092003-007

Comments: Exposed refuse in an area measuring approximately 10' x 3', adjacent to the western most black flexible pipe in the northwestern part of Cell # 2 shown in photo # 006, is shown here.



Date: September 9, 2003

Time: 8:05 a.m.

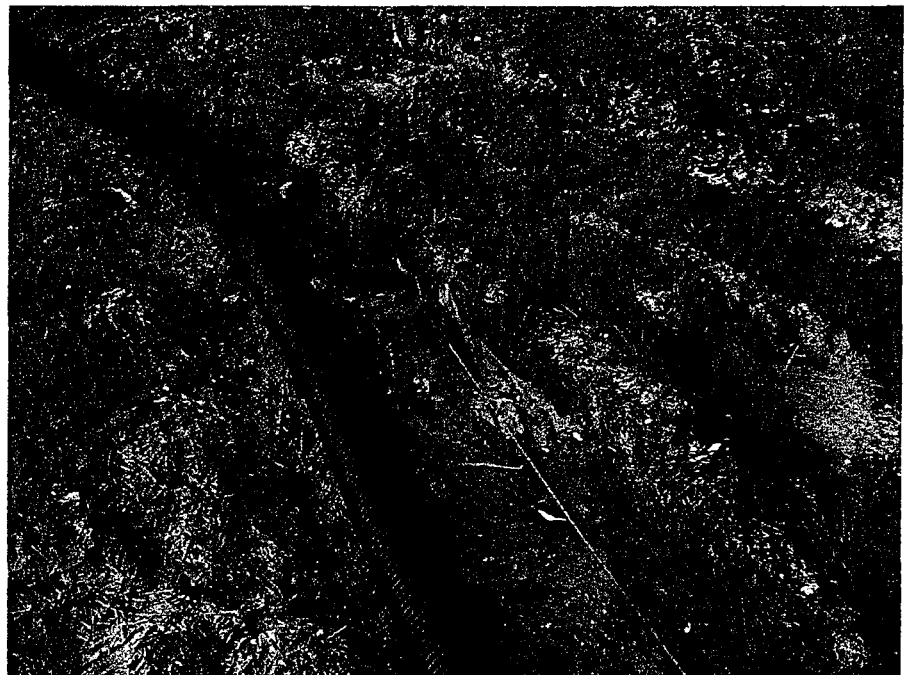
Direction: SW

Photo by: Charlie King

Photo File Name:

0830250012~09092003-008

Comments: Exposed refuse in an area measuring approximately 3' x 1', adjacent to the eastern most black flexible pipe in the northwestern part of permitted Cell # 2, is shown here.





Illinois Environmental Protection Agency
Bureau of Land

DIGITAL PHOTOGRAPHS

**LPC # 0830250012— Jersey County
Jerseyville/RCS Inc., Landfill
FOS File**

Date: September 9, 2003

Time: 8:06 a.m.

Direction: S

Photo by: Charlie King

Photo File Name:

0830250012~09092003-009

Comments: A small area of
exposed refuse is shown on the
north face of Cell # 2.



Date: September 9, 2003

Time: 8:07 a.m.

Direction: S

Photo by: Charlie King

Photo File Name:

0830250012~09092003-010

Comments: Exposed refuse in an
area measuring approximately 15'
x 2' is shown.





Illinois Environmental Protection Agency
Bureau of Land

DIGITAL PHOTOGRAPHS

LPC # 0830250012— Jersey County
Jerseyville/RCS Inc., Landfill
FOS File

Date: September 9, 2003

Time: 8:10 a.m.

Direction: S/SE

Photo by: Charlie King

Photo File Name:

0830250012~09092003-011

Comments: Exposed refuse in an area measuring approximately 20' x 2' is shown.



Date: September 9, 2003

Time: 8:20 a.m.

Direction: SE

Photo by: Charlie King

Photo File Name:

0830250012~09092003-012

Comments: A small amount of exposed refuse is shown in the soil used as daily cover.





Illinois Environmental Protection Agency
Bureau of Land

DIGITAL PHOTOGRAPHS

**LPC # 0830250012— Jersey County
Jerseyville/RCS Inc., Landfill
FOS File**

Date: September 9, 2003

Time: 8:20 a.m.

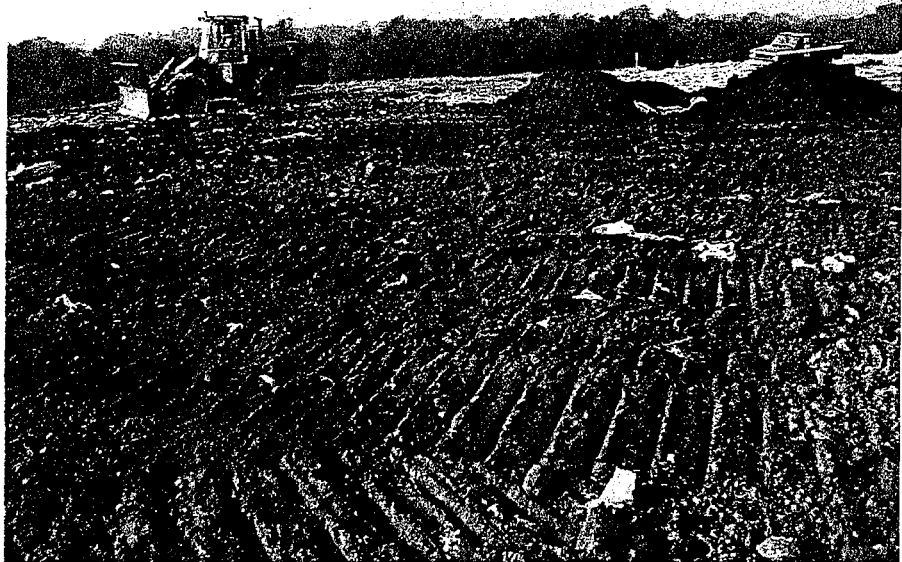
Direction: SW

Photo by: Charlie King

Photo File Name:

0830250012~09092003-013

Comments: More soil used as daily cover is shown, with a minor amount of exposed refuse.



Date: September 9, 2003

Time: 8:47 a.m.

Direction: N

Photo by: Charlie King

Photo File Name:

0830250012~09092003-014

Comments: Underground Storage Tank (UST) soil from an excavation in White Hall is shown being dumped at the active fill area.





Illinois Environmental Protection Agency
Bureau of Land

DIGITAL PHOTOGRAPHS

LPC # 0830250012— Jersey County
Jerseyville/RCS Inc., Landfill
FOS File

Date: September 9, 2003

Time: 9:04 a.m.

Direction: E/NE

Photo by: Charlie King

Photo File Name:

0830250012~09092003-015

Comments: F & F Construction is shown dumping a small load of demolished house debris



Date: September 9, 2003

Time: 9:13 a.m.

Direction: E/NE

Photo by: Charlie King

Photo File Name:

0830250012~09092003-016

Comments: Woods to the east of Cell #s 2 and 3 are shown to be clear of wastes.





Illinois Environmental Protection Agency
Bureau of Land

DIGITAL PHOTOGRAPHS

**LPC # 0830250012— Jersey County
Jerseyville/RCS Inc., Landfill
FOS File**

Date: September 9, 2003

Time: 9:13 a.m.

Direction: E/SE

Photo by: Charlie King

Photo File Name:

0830250012~09092003-017

Comments: Woods to the East/Southeast of Cell # 1 is shown to be clear of litter.



Date: September 9, 2003

Time: 9:30 a.m.

Direction: S/SE

Photo by: Charlie King

Photo File Name:

0830250012~09092003-018

Comments: The landfill, shown from the hill at the northeast corner of the landfill.





DIGITAL PHOTOGRAPHS

LPC # 0830250012— Jersey County
Jerseyville/RCS Inc., Landfill
FOS File

Date: September 9, 2003

Time: 9:48 a.m.

Direction: E

Photo by: Charlie King

Photo File Name:

0830250012~09092003-019

Comments: Waste piles from Merritt Hauling, reportedly out of Shipman, Illinois. They reportedly pick up residential refuse in Jerseyville, smaller communities and rural areas. These loads were inspected by this Inspector and found to be acceptable.



Date: September 9, 2003

Time: 10:03 a.m.

Direction: N

Photo by: Charlie King

Photo File Name:

0830250012~09092003-020

Comments: A babbling brook or stream of storm water from yet to be permitted Cell # 3 is shown flowing through a wooded area south of the south haul road, leading to the storm water detention pond.





Illinois Environmental Protection Agency
Bureau of Land

DIGITAL PHOTOGRAPHS

**LPC # 0830250012— Jersey County
Jerseyville/RCS Inc., Landfill
FOS File**

Date: September 9, 2003

Time: 10:03 a.m.

Direction: S

Photo by: Charlie King

Photo File Name:

0830250012~09092003-021

Comments: This is the same flow of water as shown in photo # 020, except the flow is moving away from this photographer.



Date: September 9, 2003

Time: 10:05 a.m.

Direction: E

Photo by: Charlie King

Photo File Name:

0830250012~09092003-022

Comments: Marsh grass and cat tails are all that can be seen in this storm water detention pond. The water flow in the previous two photograph #s, 020 and 021, had been accumulating in the pond for approximately a half-hour. A pipe under the berm that this photographer stood on, exited to a tributary stream to Sandy Creek in the next photo, # 022.





Illinois Environmental Protection Agency
Bureau of Land

DIGITAL PHOTOGRAPHS

LPC # 0830250012— Jersey County
Jerseyville/RCS Inc., Landfill
FOS File

Date: September 9, 2003

Time: 10:08 a.m.

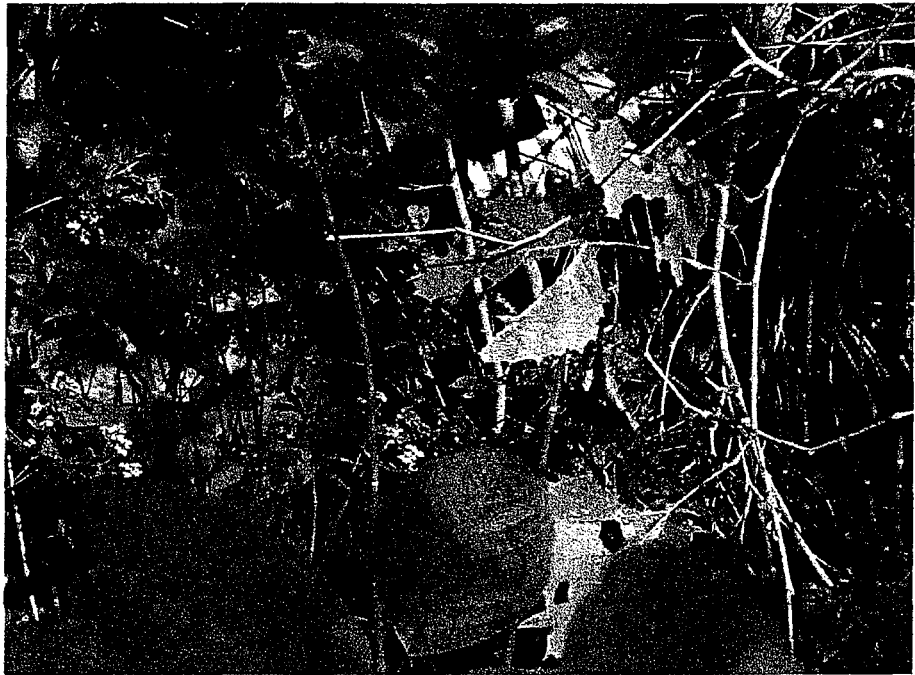
Direction: N

Photo by: Charlie King

Photo File Name:

0830250012~09092003-023

Comments: Storm water from the storm water detention pond shown in previous photo # 022, is shown exiting the under berm corrugated pipe, into a stream tributary to Sandy Creek.



PROOF OF SERVICE

I hereby certify that I did on the 27th day of October, 2003, send by Certified Mail, Return Receipt Requested, with postage thereon fully prepaid, by depositing in a United States Post Office Box the following instrument(s) entitled ADMINISTRATIVE CITATION, AFFIDAVIT, and OPEN DUMP INSPECTION CHECKLIST:

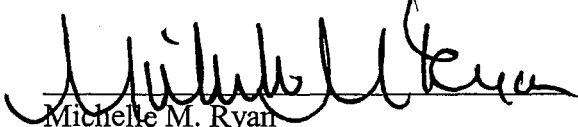
To: RCS, Inc.
12976 St. Charles Rock Road
Bridgeton, MO 64044-2418

Mr. Terry "Buck" Robbins
101 Elm Street
Chesterfield, IL 62630

Mr. Jay Ross
RCS Inc., Landfill
1336 Crystal Lake Road
Jerseyville, IL 62052

and the original and nine (9) true and correct copies of the same foregoing instruments on the same date by Certified Mail with postage thereon fully prepaid.

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


Michelle M. Ryan
Special Assistant Attorney General

Illinois Environmental Protection Agency
1021 North Grand Avenue East
P.O. Box 19276
Springfield, Illinois 62794-9276
(217) 782-5544