

EXHIBIT Q

Johnson, Ian

From: Johnson, Ian
Sent: Friday, May 31, 2024 10:48 AM
To: john.roop@illinois.gov
Subject: Laraway B-141R-M-181 information
Attachments: PC Cost Table I 2 May 31 2024.xls; TRP costs May 2024.xls

John --

Per our discussion this week, please find the attached cost estimate for the approved corrective actions required for the Olin Ponds at Laraway RDF. The cost estimate is labeled as Table 10-2 and can be inserted after Table 10-1 in the current application. In addition, I have increased the RCRA post-closure cost estimate for the groundwater monitoring section to include 4 events. I will be send the hard copies to your attention via UPS. Please contact me if you need anything else. Thanks and have a good weekend.

Ian

Table 10-2

ESTIMATED CORRECTIVE ACTION COSTS - OLIN PONDS SWMU

Item	Quantity	Units	Unit Cost	Approximate Cost
1. Pump and treat liquids in Olin Ponds to on-site treatment plant (east pond already dewatered)	191,261,000	gallons	\$0.015	\$ 2,868,915
2. Removal of phosphate solids to south stack (estimate 4' thick over 71 acres)	458,186	cy	\$7.20	\$ 3,298,939
3. Remove one-foot of impacted soils to south stack	114,546	cy	\$7.20	\$ 824,731
4. Removal of treatment plant piping	1500	feet	\$20.00	\$ 30,000
5. Sampling and testing of clay soils				
a. Sampling technician (2 days per report. 71 samples per report)	10	days	\$1,000.00	\$ 10,000
b. Soil analysis (5 samples per acre @ 71 acres)	355	samples	\$200.00	\$ 71,000
c. Reporting (5 separate reports over 3-4 years)	5	each	\$5,000	\$ 25,000
6. Corrective Action Observation:				
a. Inspector (1 @ 40 hrs/wk x 104 wks) ¹	4,160	hours	\$61.00	\$ 253,760
b. Senior Engineer (4 hrs/wk x 104 wks) ¹	416	hours	\$150.00	\$ 62,400
GRAND TOTAL				\$ 7,444,745
Notes:				
1. Phosphate solids and impacted soils removal assumed to take place for 26 weeks per year. Corrective action activities estimated to be completed in 3-4 years.)				

May 2024



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276 • (217) 782-3397

JB PRITZKER, GOVERNOR

JOHN J. KIM, DIRECTOR

217/524-3301

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

9589 0710 5270 0477 0573 75

JUN 12 2024

Waste Management of Illinois, Inc.
ATTN: Ian Johnson
21233 West Laraway Road
Joliet, Illinois 60436-9525

Waste Management of Illinois, Inc.
ATTN: Doug Hopkins, District Manager
21233 West Laraway Road
Joliet, Illinois 60436-9525

Re: 1970450002 – Will County
Laraway Recycling and Disposal Facility
USEPA ILD074411745
Log No. B-141R-M-181
RCRA Permit File (24A)
Notice of Deficiency

Dear Mr. Johnson and Mr. Hopkins:

The Illinois EPA has completed its first technical review of your application for a revision to the cost estimate at the above referenced facility located at 21233 West Laraway Road. The application, dated May 8, 2024, and May 31, 2024, was received by the Illinois EPA on May 10, 2024, and June 5, 2024, respectively. This permit application was assigned a Log No. of B-141R-M-181 by the Illinois EPA.

Pursuant to 35 Illinois Administrative Code (IAC) 702.122 the first technical review has determined that the application has technical deficiencies as outlined in the attachment to this letter.

Deficiencies in the permit application are identified in the attached Notice of Deficiency (NOD). Each of the deficiencies must be addressed before the Illinois EPA can continue the technical review of your application. Revisions to the application to address these deficiencies must be submitted to the Illinois EPA and be postmarked no later than August 31, 2024.

Revisions to your application should include one original and three copies and be in a format which allows incorporation of the new information into the appropriate sections of your application. To allow for a proper review of this new information, the response to this NOD should include a table that lists each comment in the NOD, the response, and the location in the application that was revised in response to the comment. Each revised page or drawing must have the revision date identified on them for tracking purposes.

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412 SW Washington Street, Suite D, Peoria, IL 61602 (309) 671-3022
4302 N. Main Street, Rockford, IL 61103 (815) 987-7760

Responses should be mailed to the following address:

Illinois Environmental Protection Agency
Bureau of Land #33
Permit Section
1021 North Grand Avenue East
Post Office Box 19276
Springfield, Illinois 62794-9276

All applications shall be signed in accordance with the requirements of 35 IAC 702.126 and be accompanied by a completed Illinois EPA Form LPC-PA23: RCRA Permit Application Instructions and Form which can be obtained from the Illinois EPA website.

Work required by this letter, submittal(s), 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 letter 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.

If you have any questions concerning this matter, please contact John Roop, P.E., by email at john.roop@illinois.gov or by phone at 217/524-3071.

Sincerely,



Jacqueline M. Cooperider, P.E.
Permit Section Manager
Bureau of Land

JMC:jjr/0971250007-RCRA-C656M27-NOD-1.docx

JDR *7/1/11*
Attachment: Notice of Deficiency

ATTACHMENT
NOTICE OF DEFICIENCY
1970450002 – Will County
Laraway Recycling and Disposal Facility
USEPA ILD074411745
Log No. B-141R-M-181

Below is a list of deficiencies identified by the Illinois EPA following a technical review of the above referenced RCRA Hazardous Waste Management Permit Application. Each of the deficiencies must be addressed before the Illinois EPA can continue the technical review of the application as required by 35 IAC 702.122.

1. For Table I-2, Post-Closure Cost Estimate, the Illinois EPA has calculated a different Total Post-Closure Cost than Waste Management of Illinois. This discrepancy appears to occur when the total cost is adjusted for inflation.
 - Please verify that the appropriate inflation factor of 1.036 has been applied.
2. For Table I-2, Post-Closure Cost Estimate, in the notes section, it states "...costs are provided through end of 2025". Therefore, the cost estimate is including two years of costs incurred.
 - Revise the number of events from one (1) occurrence to two (2) occurrences, to reflect the cost estimate covering two (2) years of costs incurred.
3. Table 13-1, Current Operating Areas Closure Cost Estimate, provided a total service costs of \$9,524,326. When the Illinois EPA sums all service costs, it finds the total to be \$9,254,328. There is a \$2 discrepancy between the totals.
 - Review the total sum of all services and verify that there is no rounding error causing a \$2 discrepancy.
4. For Table 13-1, Current Operating Areas Closure Cost Estimate, the following services have not been adjusted by an inflation factor of 1.036:
 - a. Grading Layer Soil Placement (1.032)
 - b. Construct Surface Water Diversion Ditches (1.032)
 - c. Inspectors (1.026)
 - d. Senior Engineer (1.033)
 - Adjust the unit price of each service by an inflation factor of 1.036 or provide a copy of a negotiated contract demonstrating the quote is valid for 2024.
5. For Table 13-2, Current Operational Areas Post-Closure Care Cost Estimate, using a Unit Price of \$0.14 per gallon, the Illinois EPA calculates the cost of Leachate Transportation and Disposal to be \$40,216. Waste Management of Illinois has calculated this cost to be \$39,878, a difference of \$338.
 - Please verify that the appropriate inflation factor of 1.036 has been applied.



Prairie View
29755 S Prairie View Drive
Wilmington, IL 60481

June 17, 2024

Mr. John Roop
IEPA - Bureau of Land
Permit Section
1021 North Grand Ave. East
Springfield, Illinois 62702

RE: **Laraway Recycling and Disposal Facility**
IEPA #1970450002 - Will County, Illinois
ILD074411745
Class 1* Permit Modification Logs B-141R-M-181
NOD Response

Dear Mr. Roop:

This letter and its attachments are being submitted to address the Agency's June 12, 2024 Notice of Deficiency (NOD) received regarding the above-referenced permit modification for Laraway RDF. Each deficiency as outlined in the NOD are addressed below.

NOD Items 1 and 2:

As we had discussed via our Teams call today, the total post-closure care cost must be multiplied by each of the last 14 years inflation factors to obtain the final total cost at the bottom right corner of table I-2. In addition, Table I-2 costs have also been revised to account for 2 years of costs incurred (through the end of 2025). Only the last two items on Table I-2 are one-time costs. Please remove the old Table I-2 and insert the revised Table I-2 into the application.

NOD Items 3 and 4:

The \$2 discrepancy in total cost on Table 13-1 is due to rounding error. The total cost as shown of Table 13-1 is to the nearest dollar. The unit costs for grading layer placement, surface water diversion ditches, inspectors, and senior engineer have been updated to the nearest penny and have the inflation factor of 1.036 applied. Please remove the old Table 13-1 and insert the revised Table 13-1 into the application.

NOD Item 5:

The leachate transportation and disposal cost for 2024 should be \$0.138824 as noted on the revised Table 13-2. This cost reflects the inflation factor of 1.036. Multiplying \$0.138824 by 787 gallons/day times 365 days/year gives an annual cost of \$39,877.88. The table rounds up to the nearest dollar or to a cost of \$39,878. Table 13-2 has been revised to reflect the 2024 unit price for leachate transportation and disposal. Typically it is not necessary to provide so many decimal places and the simple act of rounding up or down by a tenth or hundredth of a cent can cause a discrepancy of a few hundred dollars if accounting for 30 years of costs. Please remove the old Table 13-2 and insert the revised Table 13-2 into the application.

As required, the original and three copies of this information are enclosed. If you have any questions or require additional information, please contact me immediately at 815-280-6301.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to ensure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. [35 IAC 702.126(d)]

Sincerely,
WASTE MANAGEMENT OF ILLINOIS, INC.

A handwritten signature in black ink, appearing to read "Ian C. Johnson", with a long horizontal flourish extending to the right.

Ian C. Johnson, P.E.
Environmental Engineer

xc: Dave Hartke

**TABLE I-2
LARAWAY RECYCLING AND DISPOSAL FACILITY
POST-CLOSURE COST ESTIMATE**

ITEM DESCRIPTION	ASSUMPTIONS & COMMENTS	UNIT	UNIT RATE	NUMBER OF UNITS PER EVENT	NUMBER OF EVENTS	TOTAL
GENERAL MAINTENANCE & INSPECTIONS						
General maintenance of RCRA Unit (all O&M efforts except for specific line items below)	Utilities, labor, and materials	Per Year	\$20,000	1	2	\$40,000
Mow & fertilize vegetative cover	fertilize as needed, mow annual	Per Acre	\$40	55	2	\$4,400
Redress final cover (minor grading & vegetation)	Two acres every five years	Per Acre	\$1,800	2	2	\$7,200
Inspect cover, runoff/runoff systems	4 times/year	Per Inspection	\$500	4	2	\$4,000
Inspect Gas & Leachate Systems	4 times/year	Per Inspection	\$500	4	2	\$4,000
Inspect emergency/safety equipment	4 times/year	Per Inspection	\$250	4	2	\$2,000
Inspect Fence & Gates & Benchmark	4 times/year	Per Inspection	\$500	4	2	\$4,000
GROUNDWATER SAMPLING & ANALYSIS (2)						
Analytical Costs Observation wells	10 wells Semi-Ann. Lists	Per Sample	\$528	10	2	\$10,560
Analytical Costs GMZ wells	27 wells Semi-Ann. Lists	Per Sample	\$536	27	2	\$28,944
Sampling costs (includes elevation only wells)	40 wells for entire yearly program	Per Sample	\$431	40	2	\$34,480
LEACHATE SAMPLING, ANALYSIS & DISPOSAL						
Sampling & Analysis - every year	Full Appendix I list (4 samples/yr)	Per Event	\$1,350	4	2	\$10,800
Monthly level monitoring	DTMs and leachate wells(28 points/month)	Per Sample	\$25	28	24	\$16,800
Leachate Management - O&M	Utilities, labor, and materials	Per Year	\$35,000	1	2	\$70,000
Transportation & Disposal	260 loads/yr @ 4500 gallons/load	Per Gallon	\$0.17	1,170,000	2	\$397,800
GROUNDWATER EXTRACTION SYSTEM						
Groundwater Extraction System O&M	Utilities, labor, and materials	Per Year	\$50,000	1	2	\$100,000
REPORT SUBMITTALS/CERTIFICATIONS						
Misc. reporting	groundwater, RCRA, leachate	Per Year	\$15,000	1	2	\$30,000
Post-closure certification	at end of post-closure period	One time	\$5,000	1	1	\$5,000
Decommission Groundwater Wells (40 wells)	at end of post-closure period	One time	\$20,000	1	1	\$20,000
TOTAL POST-CLOSURE COST						\$789,984
2010 thru 2023 CPI increases of 1.2%, 2.1%, 1.8%, 1.5%, 1.4%, 1%, 1.3%, 1.7%, 2.3%, 1.8%, 1.2%, 4.13%,7%, 3.6%						\$1,082,559

NOTES:

(1) Per Permit Log No. B-141R, post -closure to continue until 9/10/2022, or 34 years. However, costs are provided through end of 2025.

(2) Includes sampling, evaluation, development of contour maps.

TABLE 13-1
LARAWAY RECYCLING AND DISPOSAL FACILITY
CURRENT OPERATING AREAS CLOSURE COST ESTIMATE

Service	Quantity	Unit	Unit Price (2023)	Inflation Factor (%)	Unit Price (2024)	Amount
1. Equipment Cleaning	10	hours	\$134.35	3.60	\$139.19	\$1,392
2. Backfill and Grading	20,000	cubic yards	\$3.36	3.60	\$3.48	\$69,619
3. Solidification Dismantlement	400	cubic yards	\$37.48	3.60	\$38.83	\$15,532
4. Final Cover (On-Site Material 129.64 acres)						
a. Grading Layer Soil Placement (1.0 ft)	209,152	cubic yards	\$4.02	3.60	\$4.16472	\$871,060
b. Protective Soil Cover (2.5 ft)	522,881	cubic yards	\$3.36	3.60	\$3.481	\$1,820,128
c. Topsoil Cover (0.5 ft)	104,576	cubic yards	\$3.36	3.60	\$3.481	\$364,025
d. Geocomposite Drainage Layer	5,647,118	square feet	\$0.501	3.60	\$0.519	\$2,931,058
e. Geomembrane	5,647,118	square feet	\$0.453	3.60	\$0.469	\$2,650,238
5. Landscaping (Seed and Mulch)	129.64	acres	\$2,207	3.60	\$2,286.45	\$296,416
6. Construct Surface Water Diversion Ditches	25,400	feet	\$4.02	3.60	\$4.16472	\$105,784
7. Install Gas Monitoring Probes ¹	4	each	\$6,694	3.60	\$6,935	\$27,740
8. Construction Observation						
a. Inspectors (2 @ 50 hrs/wk x 28 wks)	2800	hours	\$90	3.60	\$93.24	\$261,072
b. Engineer (8 hrs/wk x 28 wks)	224	hours	\$105	3.60	\$108.78	\$24,367
c. Senior Engineer (2 hrs/wk x 28 wks)	56	hours	\$142	3.60	\$147.112	\$8,238
9. Closure Certification	1	lump sum	\$66,930	3.60	\$69,339	\$69,339
10. Plat Preparation and Recording	1	lump sum	\$8,031	3.60	\$8,320	\$8,320
					Total	\$9,524,326

1. Four additional gas probes would be installed at closure. Two on west end of Phase 14 and two within the waste.

**TABLE 13-2
LARAWAY RECYCLING AND DISPOSAL FACILITY
CURRENT OPERATIONAL AREAS POST-CLOSURE CARE COST ESTIMATE**

Description	Quantity	Unit	Quantity	Unit	2023 Unit Price	Inflation (%)	2024 Unit Price	Annual Cost (2023)	30 Year Cost
1. Site Inspection and Documentation	3	hours	4	quarters	\$66.94	3.60	\$69.35	\$833	\$24,990
2. Final Cover Maintenance (0.33 acres @ 1')	550	cubic yards	-	-	\$7.36	3.60	\$7.62	\$4,194	\$125,820
3. Vegetation Maintenance/Mowing	187.54	acres	-	-	\$62.88	3.60	\$65.14	\$12,218	\$366,540
4. Vegetation Repair	0.66	acres	-	-	\$2,208.73	3.60	\$2,288.24	\$1,511	\$45,330
5. Miscellaneous Repairs	1	lump sum	-	-	\$1,338.62	3.60	\$1,386.81	\$1,387	\$41,610
6. Leachate Transportation and Disposal (4.2 gal/ac/day)	787.00	gallons/day	365	days	\$0.134	3.60	\$0.1388	\$39,878	\$1,196,340
7. Leachate Collection System Maintenance									
a. Labor	4	hours	52	weeks	\$46.86	3.60	\$48.55	\$10,098	\$302,940
b. Cleaning of leachate collection pipe	13,600	linear feet	-	-	\$0.69	3.60	\$0.71	\$9,722	\$291,660
8. Leachate Monitoring (Analysis and Sampling) ¹									
List L.1: 5 samples x 2 events ²	5	samples	2	events	\$903.44	3.60	\$935.96	\$9,360	\$280,800
List L.2: 1 samples/year ²	1	samples	1	year	\$776.38	3.60	\$804.33	\$805	\$24,150
9. Groundwater & Leachate Sampling and Level Measurements									
10. a. Groundwater Monitoring List G2 semi-annual wells	27	wells	2	events	\$143.96	3.60	\$149.14	\$8,054	\$241,620
b. Groundwater Monitoring List G1 semi-annual wells	27	wells	2	events	\$139.13	3.60	\$144.14	\$7,784	\$233,520
11. a. Groundwater Monitoring List G2 quarterly wells	14	wells	4	events	\$143.96	3.60	\$149.14	\$8,352	\$250,560
b. Groundwater Monitoring List G1 quarterly wells	14	wells	4	events	\$139.13	3.60	\$144.14	\$8,072	\$242,160
12. Groundwater Data Review	12	hours	4	events	\$66.94	3.60	\$69.35	\$3,329	\$99,870
13. Gas Monitoring/Sampling									
a. Labor	26	hours	1	year	\$46.86	3.60	\$48.55	\$1,263	\$37,890
b. Gas probe analysis	28	samples	4	year	\$46.86	3.60	\$48.55	\$5,438	\$163,140
c. Ambient air monitoring	4	samples	4	year	\$46.86	3.60	\$48.55	\$777	\$23,310
14. Preparation of Annual Reports/Certification of Completion	8	hours	4	quarters	\$107.10	3.60	\$110.96	\$3,551	\$106,530
15. Decommission Groundwater wells	41	wells	1	one time	\$563.78	3.60	\$584.08	\$23,948	\$23,948
								Total	\$4,709,258

Notes

1. Routine leachate monitoring performed on a semi-annual basis.
2. Lists L.1 and L.2 provided in Permit No. B-141R.



Prairie View
29755 S Prairie View Drive
Wilmington, IL 60481

June 24, 2024

Mr. John Roop
IEPA - Bureau of Land
Permit Section
1021 North Grand Ave. East
Springfield, Illinois 62702

**RE: Laraway Recycling and Disposal Facility
IEPA #1970450002 - Will County, Illinois
ILD074411745
Class 1* Permit Modification Logs B-141R-M-181
Additional Information**

Dear Mr. Roop:

This letter and its attachments are being submitted to address the Agency's e-mail from June 21st regarding the above-referenced permit modification for Laraway RDF.

RCRA Post Closure Cost Table I-2:

The groundwater monitoring unit costs noted on the attached Table I-2 are the total for each well per year. Therefore, that annual cost per well has been multiplied by 2 to account for the two years. Sampling and analytical unit costs have also been revised slightly to reflect current 3rd party pricing. Please remove previous versions of Table I-2 and insert the revised Table I-2 into the application.

As required, the original and three copies of this information are enclosed. If you have any questions or require additional information, please contact me immediately at 815-280-6301.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to ensure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. [35 IAC 702.126(d)]

Sincerely,
WASTE MANAGEMENT OF ILLINOIS, INC.

Ian C. Johnson, P.E.
Environmental Engineer

xc: Dave Hartke

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Mow & fertilize vegetative cover	fertilize as needed, mow annual	Per Acre	\$40	55	2	\$4,400
Redress final cover (minor grading & vegetation)	Two acres every five years	Per Acre	\$1,800	2	2	\$7,200
Inspect cover, runoff/runoff systems	4 times/year	Per Inspection	\$500	4	2	\$4,000
Inspect Gas & Leachate Systems	4 times/year	Per Inspection	\$500	4	2	\$4,000
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Inspect Fence & Gates & Benchmark	4 times/year	Per Inspection	\$500	4	2	\$4,000
GROUNDWATER SAMPLING & ANALYSIS (2)						
Analytical Costs Observation wells	10 wells Semi-Ann. Lists	Per Well/yr	\$660	10	2	\$13,200
Analytical Costs GMZ wells	27 wells Semi-Ann. Lists	Per Well/yr	\$670	27	2	\$36,180
Sampling costs (includes elevation only wells)	40 wells for entire yearly program	Per Well/yr	\$440	40	2	\$35,200
LEACHATE SAMPLING, ANALYSIS & DISPOSAL						
Sampling & Analysis - every year	Full Appendix I list (4 samples/yr)	Per Event	\$1,350	4	2	\$10,800
Monthly level monitoring	DTMs and leachate wells(28 points/month)	Per Sample	\$25	28	24	\$16,800
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GROUNDWATER EXTRACTION SYSTEM						
Groundwater Extraction System O&M	Utilities, labor, and materials	Per Year	\$50,000	1	2	\$100,000
REPORT SUBMITTALS/CERTIFICATIONS						
Misc. reporting	groundwater, RCRA, leachate	Per Year	\$15,000	1	2	\$30,000
Post-closure certification	at end of post-closure period	One time	\$5,000	1	1	\$5,000
Decommission Groundwater Wells (40 wells)	at end of post-closure period	One time	\$20,000	1	1	\$20,000
TOTAL POST-CLOSURE COST						\$800,580
2010 thru 2023 CPI increases of 1.2%, 2.1%, 1.8%, 1.5%, 1.4%, 1%, 1.3%, 1.7%, 2.3%, 1.8%, 1.2%, 4.13%, 7%, 3.6%						\$1,097,079

NOTES:

- (1) Per Permit Log No. B-141R, post -closure to continue until 9/10/2022, or 34 years. However, costs are provided through end of 2025.
(2) Includes sampling, evaluation, development of contour maps.



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276 • (217) 782-3397

JB PRITZKER, GOVERNOR

JOHN J. KIM, DIRECTOR

217/524-3301

CERTIFIED MAIL

RETURN RECEIPT REQUESTED

JUL 03 2024

9589 0710 5270 0389 7077 02

Waste Management of Illinois, Inc.
ATTN: Ian Johnson
21233 West Laraway Road
Joliet, Illinois 60436-9525

Waste Management of Illinois, Inc.
ATTN: Doug Hopkins, District Manager
21233 West Laraway Road
Joliet, Illinois 60436-9525

Re: 1970450002 – Will County
Laraway Recycling and Disposal Facility
USEPA ILD074411745
Log No. B-141R-M-181
RCRA Permit File – 24A
Notice of Deficiency

Dear Mr. Johnson and Mr. Hopkins:

The Illinois EPA has completed its second technical review of your application for a revision to the cost estimate at the above referenced facility located at 21233 West Laraway Road. The application, dated May 8, 2024, May 31, 2024, June 17, 2024, and June 24, 2024, was received by the Illinois EPA on May 10, 2024, June 5, 2024, June 20, 2024, and June 26, 2024, respectively. This permit application was assigned a Log No. of B-141R-M-181 by the Illinois EPA.

Pursuant to 35 Illinois Administrative Code (IAC) 702.122 the second technical review has determined that the application has technical deficiencies as outlined in the attachment to this letter.

Deficiencies in the permit application are identified in the attached Notice of Deficiency (NOD). Each of the deficiencies must be addressed before the Illinois EPA can continue the technical review of your application. Revisions to the application to address these deficiencies must be submitted to the Illinois EPA and be postmarked no later than August 31, 2024.

Revisions to your application should include one original and three copies and be in a format which allows incorporation of the new information into the appropriate sections of your application. To allow for a proper review of this new information, the response to this NOD should include a table that lists each comment in the NOD, the response, and the location in the application that was revised in response to the comment. Each revised page or drawing must have the revision date identified on them for tracking purposes.

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115 S. LaSalle Street, Suite 2203, Chicago, IL 60603
1101 Eastport Plaza Dr., Suite 100, Collinsville, IL 62234 (618) 346-5120
9511 Harrison Street, Des Plaines, IL 60016 (847) 294-4000

595 S. State Street, Elgin, IL 60123 (847) 608-3131
2309 W. Main Street, Suite 116, Marion, IL 62959 (618) 993-7200
412 SW Washington Street, Suite D, Peoria, IL 61602 (309) 671-3022
4302 N. Main Street, Rockford, IL 61103 (815) 987-7760

Responses should be mailed to the following address:

Illinois Environmental Protection Agency
Bureau of Land #33
Permit Section
1021 North Grand Avenue East
Post Office Box 19276
Springfield, Illinois 62794-9276

All applications shall be signed in accordance with the requirements of 35 IAC 702.126 and be accompanied by a completed Illinois EPA Form LPC-PA23: RCRA Permit Application Form which can be obtained from the Illinois EPA website.

Work required by this letter, submittal(s), 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 letter 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.

If you have any questions concerning this matter, please contact John Roop, P.E., by email at john.roop@illinois.gov or by phone at 217/524-3071.

Sincerely,

 (for JMC)

Jacqueline M. Cooperider, P.E.
Permit Section Manager
Bureau of Land

JMC:jjr/1970450002-RCRA-B141RM181-NOD-2.docx

JAR ~~JK~~ TNH SDD
Attachment: Notice of Deficiency

ATTACHMENT
 NOTICE OF DEFICIENCY
 1970450002 – Will County
 Laraway Recycling and Disposal Facility
 USEPA ILD074411745
 Log No. B-141R-M-181

Below is a list of deficiencies identified by the Illinois EPA following a technical review of the above referenced RCRA Hazardous Waste Management Permit Application. Each of the deficiencies must be addressed before the Illinois EPA can continue the technical review of the application as required by 35 IAC 702.122.

1. The Illinois EPA received the Additional Information from Laraway RDF dated June 24, 2024, on June 26, 2024. This submittal provided a revision of Table I-2 and a copy of the Master Service Agreement (MSA) from Environmental Monitoring and Technologies, Inc. There appears to be a discrepancy between Table I-2 and the MSA. In Table I-2, Groundwater Sampling and Analysis section, Analytical Costs Observation wells, it is stated that there are ten (10) wells on the semi-annual list, which cost \$660 per well, and will be sampled for two (2) years, totaling \$13,200. The MSA states that the RCRA Task 1.1 – Second Quarter Groundwater (sampling and analysis) costs \$7,295, RCRA Task 1.2 – Fourth Quarter Groundwater (sampling and analysis) costs \$7,295, and RCRA Task 2.1 and Task 2.2 – Second Quarter and Fourth Quarter RCRA Levels cost \$25 per quarter, so \$50 total. Summing all three values, \$7,295, \$7,295, and \$50, the grand total is found to be \$14,640. There is a discrepancy of \$1,440 between the Table I-2 total and MSA total.

The laboratory quote should clearly state that the quote is inclusive of two (2) years of sampling and analytical costs. The sampling and analysis cost quote, provided from the laboratory, should match the values provided in the cost estimate. Currently, one (1) quote has a discrepancy and three (3) quotes are not provided for. Please provide supporting documentation to justify the values provided in the Table I-2 cost estimate.

Item	Table I-2	MSA	Difference
Analytical Costs Observation Wells	\$660 * 10 wells * 2 years = \$13,200	\$7,295 + \$7,295 + \$50 = \$14,640	\$14,640 - \$13,200 = \$1,440
Analytical Costs GMZ Wells	\$670 * 27 wells * 2 years = \$36,180	-	-
Sampling Costs (elevation only wells)	\$440 * 40 wells * 2 years = \$35,200	-	-
Sampling & Analysis – every year	\$1,350 * 4 samples * 2 years = \$10,800	-	-



July 8, 2024

Mr. John Roop
IEPA - Bureau of Land
Permit Section
1021 North Grand Ave. East
Springfield, Illinois 62702

Prairie View
29755 S Prairie View Drive
Wilmington, IL 60481

**RE: Laraway Recycling and Disposal Facility
IEPA#1970450002 / ILD074411745 - Will County, Illinois
Class 1* Permit Modification Logs B-141R-M-181
NOD Response**

Dear Mr. Roop:

This letter and its attachments are being submitted to address the Agency's July 3, 2024 Notice of Deficiency (NOD) received regarding the above-referenced permit modification for Laraway RDF. Each deficiency as outlined in the NOD is addressed below.

NOD Items 1:

As we had discussed via our Teams call today, the groundwater sampling and analysis costs in Table I-2 are much higher than what we are actually paying for today (2024 dollars). I have attached the lab analytical costs for the E1, E2, and E3 groundwater lists. Also attached are the sampling costs for the groundwater and leachate for the year, annual lab analysis costs for the leachate, and a hand calculation showing what we are currently paying in 2024 dollars versus what is listed in Table I-2.

The post-closure care unit costs in Table I-2 must be multiplied by each of the last 14 years inflation factors to obtain the 2024 unit costs. The latest version of Table I-2 previously provided as part of the June 24, 2024 NOD submittal is still valid.

As required, the original and three copies of this information are enclosed. If you have any questions or require additional information, please contact me immediately at 815-280-6301.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to ensure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. [35 IAC 702.126(d)]

Sincerely,
WASTE MANAGEMENT OF ILLINOIS, INC.

Ian C. Johnson, P.E.
Environmental Engineer

xc: Dave Hartke

ANALYTICAL COSTS
OBSERVATION WELLS (10 WELLS)

2nd QTR - E1 & E3 LISTS = \$484/WELL x 10 = \$4840

4TH QTR - E2 LIST = \$206/WELL x 10 = \$2060

\$6900/YEAR ÷ 10 = \$690/WELL (2024 DOLLARS)

COST IN
TABLE I-2 = \$904/WELL
(2024 DOLLARS)

ANALYTICAL COSTS
GMZ WELLS (27 WELLS)

2nd QTR - E1 & E3 LISTS = \$484/WELL x 27 = \$13,068

4TH QTR - E1 LIST = \$215/WELL x 27 = \$5805

\$18,873/YEAR ÷ 27 = \$700/WELL
(2024 DOLLARS)

COST
IN TABLE I-2 = \$917/WELL
(2024 DOLLARS)

GROUNDWATER
SAMPLING COSTS

2nd QTR = \$7295 (ALL WELLS)

4TH QTR = \$7295 (ALL WELLS)

WATER LEVELS 2nd & 4TH QTR = \$50

TOTAL \$14,640/YEAR ÷ 40 = \$366/WELL (2024 DOLLARS)

COST
IN TABLE I-2 = \$602/WELL
(2024 DOLLARS)

LEACHATE SAMPLING
& ANALYSIS (ANNUAL)

APP. I LIST - \$4252 FOR 4 POINTS

SAMPLING - \$1000 FOR 4 POINTS

\$5252/YEAR ÷ 4 = \$1313/POINT (2024 DOLLARS)

COST IN TABLE
I-2 = \$1849/POINT (2024 DOLLARS)



Environment Testing

LARAWAY

RCRA LEACHATE ANALYSIS

Invoice No.	4800122946	Invoice Date	February 12, 2024
Terms	Net 75 days	Federal Tax ID	47-4895193
Remit to	Eurofins Environment Testing Northeast, LLC PO BOX 1465, Carol Stream, IL 60132-1465		
Wire	Citibank ABA: 031100209 Acct# 38996683 SWIFT Code: CITIUS33		
ACH	Citibank ABA: 031100209 Acct# 38996683 SWIFT Code: CITIUS33		

Bill to:
Waste Management - Accounts Payable Attn: lgrassl@wm.com PO Box 4745 Portland, OR 97208

Ship to:
Waste Management Prairie View RDF 29755 Prairie View Dr. Wilmington, IL 60481

P.O. Number	W.O. Number	Contract Number	Work Ordered by
13269784			Ian Johnson
Job Description	Site Name	SDG Number	Invoice Contact
See below	Laraway RDF		Waste Management Invoices

Job No.	Job Description	Receipt Date	Quantity	Unit Price	Amount
	Annual-RCRA Leachate (1)				
J216124-1	Laraway RDF	01/03/2024			
	8290A - Appendix 9 List		4.00	477.75	1,911.00
	6010C - Metals ICP		4.00	87.36	349.44
	7470A - Mercury (CVAA)		4.00	9.10	36.40
	8081B - Pesticides		4.00	72.80	291.20
	8082A - PCBs		4.00	50.96	203.84
	8151A - Herbicides		4.00	86.45	345.80
	8260C - VOA - 8260		4.00	70.07	280.28
	8270D - Semi-volatiles		4.00	154.70	618.80
	9012B - Cyanide, Total and/or Amenable		4.00	17.29	69.16
	SM 4500 S2 F - Sulfide, Total		4.00	8.19	32.76
	Contracted Discount 7%		1.00	-289.71	(289.71)
	Inflationary Surcharge 9.75%		1.00	403.52	403.52

ANALYTICAL
ANNUAL
COST

Project Number	Client Number	Project Manager	Subtotal (USD)	\$4,252.49
48002980	429373	Katelyn Proulx		
Latest Sample Receipt Date	Latest Report Date	Phone Number	Total (USD)	\$4,252.49
01/03/2024	02/07/2024	(716) 691-2600		

For proper credit, please include invoice number on all remittance.

Eurofins Buffalo - 10 Hazelwood Drive, Amherst, NY 14228-2298

This invoice falls under Eurofins Environment Testing Northeast, LLC Standard T&C's of Net 30 Days unless superseded by another valid contract vehicle in place at the time these services were rendered.

Site/Project Version: Current Lims Configuration

Calendar Year: 2024

Eurofins Project No: 48002980

Event ID: 1642

Laboratory TAT Standard = 15 Business Days

Laraway RDF

QC Reporting Level: 2

Site #	Monitoring Code	Annual RCRA - E1 List
495	200	Sampled in Months: 10

Method	Analyte	Sub-Contractor	Units	Reporting Limit	cost
8260C	1,1,1-Trichloroethane		ug/l.	1	\$77.00
8260C	1,1,2-Trichloroethane		ug/l.	1	-
8260C	1,1-Dichloroethane		ug/l.	1	-
8260C	1,1-Dichloroethylene		ug/L	1	-
8260C	1,2-Dichloroethane		ug/L	1	-
8260C	1,2-Dichloropropane		ug/L	1	-
8260C	Chloroethane		ug/L	1	-
8260C	Chloromethane		ug/l.	1	-
8260C	cis-1,2-Dichloroethylene		ug/l.	1	-
8260C	Dichlorodifluoromethane		ug/l.	1	-
8260C	Tetrachloroethylene		ug/L	1	-
8260C	trans-1,2-Dichloroethylene		ug/l.	1	-
8260C	Trichloroethylene		ug/l.	1	-
8260C	Trichlorofluoromethane		ug/L	1	-
8260C	Vinyl chloride		ug/l.	1	-
8260C	1,1,1-Trichloroethane		ug/l.	1	\$0.00
8260C	1,1,2-Trichloroethane		ug/L	1	-
8260C	1,1-Dichloroethane		ug/l.	1	-
8260C	1,1-Dichloroethylene		ug/L	1	-
8260C	1,2-Dichloroethane		ug/L	1	-
8260C	1,2-Dichloropropane		ug/l.	1	-
8260C	Chloroethane		ug/l.	1	-
8260C	Chloromethane		ug/l.	1	-
8260C	cis-1,2-Dichloroethylene		ug/l.	1	-
8260C	Dichlorodifluoromethane		ug/l.	1	-
8260C	Tetrachloroethylene		ug/L	1	-
8260C	trans-1,2-Dichloroethylene		ug/l.	1	-
8260C	Trichloroethylene		ug/l.	1	-
8260C	Trichlorofluoromethane		ug/l.	1	-
8260C	Vinyl chloride		ug/l.	1	-
8260C SIM	p-Dioxane		ug/L	1.6	\$77.00
6010C	Barium, Total		ug/L	2	\$6.00
6010C	Chromium, Total		ug/L	4	\$6.00
6010C	Arsenic, Dissolved		ug/l.	15	\$6.00
6010C	Barium, Dissolved		ug/L	2	\$6.00
6010C	Chromium, Dissolved		ug/l.	4	\$6.00
6010C	Lead, Dissolved		ug/l.	10	\$6.00
6020A	Arsenic, Total		ug/L	1	\$8.00

6020A	Lead, Total		ug/L	l		\$8.00
SM 4500 Cl- E	Chloride		mg/L	l		\$9.00
Field Sampling	pH, Field	X	SU	n/a		\$0.00
Field Sampling	Specific Conductance	X	umhos/cm	n/a		-
Field Sampling	Bottom Elevation (ft MSL)	X	ft/msl	n/a		-
Field Sampling	Temperature	X	Degrees F	n/a		-
Field Sampling	Oxidation Reduction Potential	X	millivolts	n/a		-
Field Sampling	Ground Water Elevation	X	ft/msl	n/a		-
Field Sampling	Depth to water from land surface	X	ft	n/a		-
Field Sampling	Field Turbidity	X	NTU	n/a		-
Field Sampling	Measuring Point Elevation (ft MSL)	X	ft/msl	n/a		-
Field Sampling	Depth to Water from Top of Casing	X	ft	n/a		-

total \$215.00



E1 LIST

Site/Project Version: Current Lims Configuration

Calendar Year: 2024 Eurofins Project No: 48002980

Event ID: 1643

Laboratory TAT Standard = 15 Business Days

Laraway RDF

QC Reporting Level: 2

Site #	Monitoring Code	Annual RCRA Observation Wells - IEPA E2 list
495	200	Sampled in Months: 10

Method	Analyte	Sub-Contractor	Units	Reporting Limit	Cost
8260C	1,2-Dichloropropane		ug/L	1	\$77.00
8260C	Chloroethane		ug/L	1	-
8260C	Chloromethane		ug/L	1	-
8260C	Dichlorodifluoromethane		ug/L	1	-
8260C	trans-1,2-Dichloroethylene		ug/L	1	-
8260C	Trichlorofluoromethane		ug/L	1	-
8260C	1,2-Dichloropropane		ug/L	1	\$0.00
8260C	Chloroethane		ug/L	1	-
8260C	Chloromethane		ug/L	1	-
8260C	Dichlorodifluoromethane		ug/L	1	-
8260C	trans-1,2-Dichloroethylene		ug/L	1	-
8260C	Trichlorofluoromethane		ug/L	1	-
8260C SIM	p-Dioxane		ug/L	1.6	\$77.00
6010C	Barium, Total		ug/L	2	\$6.00
6010C	Chromium, Total		ug/L	4	\$6.00
6010C	Arsenic, Dissolved		ug/L	15	\$6.00
6010C	Barium, Dissolved		ug/L	2	\$6.00
6010C	Chromium, Dissolved		ug/L	4	\$6.00
6010C	Lead, Dissolved		ug/L	10	\$6.00
6020A	Arsenic, Total		ug/L	1	\$8.00
6020A	Lead, Total		ug/L	1	\$8.00
Field Sampl	Field pH	X	SU	n/a	\$0.00
Field Sampl	Specific Conductance	X	umhos/cm	n/a	-
Field Sampl	Bottom Elevation (ft MSL)	X	ft/msl	n/a	-
Field Sampl	Temperature	X	Degrees F	n/a	-
Field Sampl	Oxidation Reduction Potential	X	millivolts	n/a	-
Field Sampl	Ground Water Elevation	X	ft/msl	n/a	-
Field Sampl	Depth to water from land surface	X	ft	n/a	-
Field Sampl	Field Turbidity	X	NTU	n/a	-
Field Sampl	Measuring Point Elevation (ft MS	X	ft/msl	n/a	-
Field Sampl	Depth to Water from Top of Casin	X	ft	n/a	-
Total					\$206.00

Laboratory TAT Standard = 15 Business Days

Laraway RDF

QC Reporting Level: 2

Site #	Monitoring Code	ANNUAL RCRA (4) IEPA E3 List
495	200	Sampled in Months: 4

Method	Analyte	Sub-Contractor	Units	Reporting Limit	cost
8260C	1,1,1-Trichloroethane		ug/L	1	\$77.00
8260C	1,1,2-Trichloroethane		ug/L	1	-
8260C	1,1-Dichloroethane		ug/L	1	-
8260C	1,1-Dichloroethylene		ug/L	1	-
8260C	1,2-Dichloroethane		ug/L	1	-
8260C	1,2-Dichloropropane		ug/L	1	-
8260C	Acetone		ug/L	10	-
8260C	Benzene		ug/L	1	-
8260C	Carbon disulfide		ug/L	1	-
8260C	Chlorobenzene		ug/L	1	-
8260C	Chloroethane		ug/L	1	-
8260C	Chloromethane		ug/L	1	-
8260C	cis-1,2-Dichloroethylene		ug/L	1	-
8260C	Dichlorodifluoromethane		ug/L	1	-
8260C	Ethylbenzene		ug/L	1	-
8260C	Isobutanol		ug/L	40	-
8260C	Methyl Ethyl Ketone		ug/L	10	-
8260C	Methylene Chloride		ug/L	1	-
8260C	o-Dichlorobenzene		ug/L	1	-
8260C	Tetrachloroethylene		ug/L	1	-
8260C	Toluene		ug/L	1	-
8260C	trans-1,2-Dichloroethylene		ug/L	1	-
8260C	Trichloroethylene		ug/L	1	-
8260C	Trichlorofluoromethane		ug/L	1	-
8260C	Vinyl chloride		ug/L	1	-
8260C	Xylenes, Total		ug/L	2	-
8260C	1,1,1-Trichloroethane		ug/L	1	\$0.00
8260C	1,1,2-Trichloroethane		ug/L	1	-
8260C	1,1-Dichloroethane		ug/L	1	-
8260C	1,1-Dichloroethylene		ug/L	1	-
8260C	1,2-Dichloroethane		ug/L	1	-
8260C	1,2-Dichloropropane		ug/L	1	-
8260C	Acetone		ug/L	10	-
8260C	Benzene		ug/L	1	-
8260C	Carbon disulfide		ug/L	1	-
8260C	Chlorobenzene		ug/L	1	-
8260C	Chloroethane		ug/L	1	-
8260C	Chloromethane		ug/L	1	-

8260C	cis-1,2-Dichloroethylene		ug/L	1	-
8260C	Dichlorodifluoromethane		ug/L	1	-
8260C	Ethylbenzene		ug/L	1	-
8260C	Isobutanol		ug/L	40	-
8260C	Methyl Ethyl Ketone		ug/L	10	-
8260C	Methylene Chloride		ug/L	1	-
8260C	o-Dichlorobenzene		ug/L	1	-
8260C	Tetrachloroethylene		ug/L	1	-
8260C	Toluene		ug/L	1	-
8260C	trans-1,2-Dichloroethylene		ug/L	1	-
8260C	Trichloroethylene		ug/L	1	-
8260C	Trichlorofluoromethane		ug/L	1	-
8260C	Vinyl chloride		ug/L	1	-
8260C	Xylenes, Total		ug/L	2	-
8270D LL	Hexachlorophene	X	ug/L	25	\$170.00
8270D LL	Hexachloropropene	X	ug/L	10	-
8270D LL	Kepona	X	ug/L	20	-
8270D LL	Pyridine	X	ug/L	5	-
6010C	Cadmium, Total		ug/L	2	\$6.00
6010C	Iron, Total		ug/L	50	\$6.00
7470A	Mercury, Total		ug/L	0.2	\$10.00
Field Sampling	Field pH	X	SU	n/a	\$0.00
Field Sampling	Bottom Elevation (ft MSL)	X	ft/msl	n/a	-
Field Sampling	Specific Conductance, Field	X	umhos/cm	n/a	-
Field Sampling	Temperature	X	Degrees F	n/a	-
Field Sampling	Oxidation Reduction Potential	X	millivolts	n/a	-
Field Sampling	Ground Water Elevation	X	ft/msl	n/a	-
Field Sampling	Depth to water from land surface	X	ft	n/a	-
Field Sampling	Field Turbidity	X	NTU	n/a	-
Field Sampling	Measuring Point Elevation (ft MSL)	X	ft/msl	n/a	-
Field Sampling	Depth to Water from Top of Casing	X	ft	n/a	-

total \$269.00



E3 LIST

